

Understanding Fiscal Intermediaries



Key Points

- Fiscal intermediaries are **providers who distribute funding and perform administrative tasks on behalf of grantees of record.**
- **Grantees should have an up-to-date list of their providers**, even if the fiscal intermediary is responsible for managing the providers who receive funding.
- **Grantees must ensure that their providers report data accurately and on time**, with the help of their fiscal intermediary.
- Acting as a fiscal intermediary **does not make a provider responsible for or grant it access to other providers' client-level data.** They can however help grantees review other types of RSR data for submission.
- A grantee **cannot designate itself as its own fiscal intermediary.**
- A fiscal intermediary **is not considered a second-level provider to itself.**

Introduction

Grantees of record are the official Ryan White grantees that receive Federal funding directly from HRSA. Fiscal intermediaries act on behalf of grantees of record to distribute funding to second-level providers. While this type of relationship has existed before the RSR reporting requirements, it is important that both grantees and providers understand how the fiscal

intermediary relationship affects their data reporting responsibilities. This document describes how fiscal intermediaries work and what issues grantees and providers need to be aware of when collaborating in this way.

What are fiscal intermediaries?

Grantees can opt to have a certain provider offer their organization administrative and fiscal support. In particular, fiscal intermediaries typically distribute funding and help manage sub-providers. Fiscal intermediaries often come into play within Part B funding situations. A typical scenario is that a state will give a county or city Part B funding to allocate to providers in its area.

There is no official process for appointing a fiscal intermediary and these relationships can take many different forms. In some cases, the grantee is heavily involved in selecting the sub-providers who receive funding. In other cases, the fiscal intermediary has the autonomy to pick the providers who receive funding themselves. That said, a provider is not considered a fiscal intermediary simply because they aid the grantee with administrative tasks; the relationship must involve the distribution of funding.

Fiscal intermediaries and RSR reporting

Communication between grantees and fiscal intermediaries is particularly important for the reporting process to ensure that each party fulfills its respective requirements and does not breach confidentiality requirements.

Grantees need to know which providers receive their funding and understand that as the grantee of record, they are ultimately responsible for how their funding is used. A

Stories from the field...

A Part B grantee uses a city health department to distribute funding to providers in a particular area. This grantee is not involved in selecting providers and has no direct communication with them. How should this grantee go about completing the RSR?

As a first step, the grantee should request from its fiscal intermediary an up-to-date list (including contract and contract information) of their providers. With this information, the grantee can ensure all these providers are included in its Grantee Report.

As the reporting deadline approaches, both the grantee and fiscal intermediary can remind providers to submit their data. Once all the Provider and Client Reports have been submitted, the grantee and fiscal intermediary can review the confirmation reports together before the grantee approves and submits the data.

grantee cannot be its own fiscal intermediary and a fiscal intermediary provider cannot be its own second-level provider. Additionally, fiscal intermediaries cannot review other providers' client-level data and should not submit data on behalf of other providers.

That said, fiscal intermediaries can help grantees in submitting data. For example, fiscal intermediaries can review the Provider Reports and client-level data upload confirmation reports (which do not contain client-level data) and offer feedback to grantees on whether reports should be accepted.

Learn More!

Consult the Instruction Manual: http://www.careacttarget.org/library/RSR_Instruction_Manual_v1-4.pdf or send the TA team an email: RSR.TA@sphereinstitute.org