



Expense Reimbursement for Consumer Members of RWHAP Part A Planning Councils/Planning Bodies

Overview

Recruiting and retaining Ryan White HIV/AIDS Program (RWHAP) Part A consumers as active members is a continuing need for Planning Councils and Planning Bodies (PC/PBs). Reimbursement of expenses can be an important factor in determining whether a consumer can afford to serve. This brief document summarizes guidance and expectations about such reimbursements from the Health Resources and Services Administration's HIV/AIDS Bureau (HRSA HAB), and provides sample policies and procedures.

HRSA HAB Expectations

The Ryan White HIV/AIDS Program (RWHAP) *Part A Manual* and other documents encourage PC/PBs to address financial costs of participation for consumer members. The Manual notes that a major obstacle to consumer involvement in planning councils is the financial cost of participation and explains that:

"Under Ryan White Part A grants, funds are available not only for administrative costs but also for Planning Council Support. Ryan White funds can be used to cover actual expenses for PLWHA such as child or dependent care, transportation, or other meeting-related costs, as well as for costs related to committee participation, particularly for consumers serving as committee chairs. Planning councils should establish, explain, and consistently implement specific policies related to expense reimbursements for planning council members. These policies should specify what types of expenses are reimbursable, under what conditions, required documentation, and expenditure limits.

Ryan White funds cannot be used to provide cash payments such as stipends or honoraria. The payments must represent reimbursements for actual allowable expenses, backed up by documentation such as taxi receipts.

Generally, expense reimbursement is provided only for unaligned consumer members of the planning council." [p 130]

Federal guidance can be summarized as follows:

1. Who may request reimbursement:

- The PC/PB is allowed to reimburse actual expenses of participation for consumers who are PC/PB members, or serve as members of PC/PB committees (including the consumer committee), or consumers specifically invited to provide input or make a presentation before the PC/PB or a committee.
- PC/PBs may not use RWHAP funds to reimburse expenses for consumers who simply attend PC/PB-related meetings as members of the public.
- Normally, other categories of members should not receive reimbursement.

2. **What can be reimbursed:** Cash reimbursements can be provided for local travel costs, child care, or other actual expenses related to meeting attendance by unaligned consumer members.
3. **Local transportation:** Most frequent expenses involve local transportation – bus, metro, commuter train, or taxi fares, or mileage reimbursement and parking costs for consumers who drive their own cars.
4. **Other consumer expenses:** The PC/PB may reimburse other actual costs for a consumer who is a PC/PB or committee Chair or Co-Chair, such as internet fees or office supply costs, but these should be budgeted in the appropriate line item of the PC/PB budget, not as consumer meeting expenses. Similarly, the PC/PB may pay for equipment such as a hot spot or smartphone to enable consumer members to participate in remote meetings (e.g., during the COVID-19 emergency), but these costs are not considered expense reimbursements and are budgeted under a different line item such as communications.
5. **Other requirements:** Costs must be reasonable, and they must be documented.
6. **Policies and procedures:** Expense reimbursements must be based on clear PC/PB reimbursement policies and procedures, so that everyone understands what expenses are reimbursed and how they must be documented and reported; these policies and procedures must be applied equitably.
7. **Funding:** The PC/PB must provide funding for expense reimbursements and other consumer expenses in its support budget.
8. **Local requirements:** Some recipients have local laws or regulations that may affect how expense reimbursements are provided.

Expense reimbursements from administrative funds: There is sometimes confusion about whether cash reimbursements to consumer members are permitted, because of the rule that RWHAP *program* funds cannot be used to provide cash payments to clients for services such as medical transportation or child care. However, this rule *does not apply* to reimbursements to consumer members of PC/PBs for the actual expenses of participation in PC/PB meetings and other planning activities. These reimbursements are provided using administrative funds, not program funds, and are not related to a consumer's HIV care. Planning Council Support (PCS) funds may be budgeted for this purpose. For example, a consumer member who drives a car to a meeting should receive reimbursement for the real costs incurred, assuming the member can document both the expense and participation in the PC/PB activity involved.

Reimbursement using prepaid cards: Some PC/PBs reimburse mileage cost through the use of gas or other gift cards. Use of a gas card is allowable provided the consumer can use the card without undue difficulty. Cash reimbursement may be preferable if the appropriate type of gas station is not easily accessible to the consumer. Reimbursements should not be made through any method that requires the consumer to pay a fee, such as some types of debit card. Nor should a consumer receive a gift card that has limited use in place of an actual reimbursement.

Making sure costs are "reasonable": For expenses such as child care costs, the PC/PB must be able to demonstrate that the amount reimbursed is "reasonable." One way to do that is to establish a reimbursement ceiling based on an established local child care rate. For example, the local social services reimbursement rate for private child care or the maximum level allowable for child care costs funded under Part A might be used. Actual reimbursement could be lower, based on the invoiced amount, but not higher.

Challenges of implementing reimbursements: A PC/PB's expense reimbursement process needs to be fair, manageable, and efficient for both consumers and PCS staff. The process can be challenging, since it may require processing reimbursement requests for several dozen people each month. Among the issues to consider:

- **Modes of travel:** PC/PBs need to specify allowable modes of local travel. Some provide bus passes or metro cards to consumers or reimburse for the costs later. Most PC/PBs do not pay for taxis when other options are available, unless the consumer has special needs or the time required for travel and transfers is determined to be excessive.
- **Mileage requests:** Since there is no receipt available to document mileage, the PC/PB needs a consistent way to determine the number of miles traveled. For example, one PC/PB asks consumers to provide the address from which they typically travel to meetings (e.g., residence or work address), determines the driving distance online, and then easily calculates the monthly reimbursement for a round trip between that address and the location of the meeting. The reimbursement is consistent from month to month unless the consumer indicates a different address. Some jurisdictions require consumers to show their driver's license and proof of car insurance annually if they want mileage reimbursement.
- **Policies and procedures:** The PC/PB needs to clarify requirements and minimize improper reimbursement requests. For example, if two consumers come to the meeting in the same car, only one should receive mileage reimbursement.
- **Consumer certification:** Consumers should be expected to certify that the reimbursement amount requested is accurate and represents actual, allowable costs.
- **Forms:** Consumers may need help in filling out reimbursement request forms and clarity in how to obtain and submit needed receipts. For example, the PC/PB should require a receipt for parking or child care, but how does a consumer document an expenditure for metro travel using a prepaid metro card? It may be sufficient to specify the starting and destination stations and time of travel, so PCS can determine the cost.
- **Frequency of reimbursement requests:** Some PC/PBs ask that reimbursement requests be submitted monthly to cover expenses for all committee and PC/PB meetings and any special PC/PB activities events (e.g., a data presentation or annual retreat). Others allow a separate form for each meeting or event.
- **Prompt reimbursement:** Staff need to be able to review invoices and arrange reimbursements promptly; many consumers cannot afford a long delay.

Addressing these challenges requires that the PC/PB establish appropriate policies and procedures, provide clear and specific forms, and implement its policies consistently.

Sample Expense Reimbursement Bylaws Provision, Policy and Procedures

Bylaws should provide basic information about who can be reimbursed, under what conditions, for what types of expenses, and specify any limitations. Policies and procedures should be clear, sufficiently detailed to provide clear guidance, appropriate for your jurisdiction, and consistent with both federal and local requirements. The samples presented here borrow from multiple planning councils.

Sample Bylaws Provision

Compensation and Expense Reimbursement

Persons serving as members of the Planning Council or its committees shall not receive any salary or other compensation for their services. However, members of the Planning Council and of Planning Council committees who are consumers of Ryan White HIV/AIDS Program Part A services may be reimbursed for reasonable and allowable expenses incurred in connection with their duties as members. Reimbursement will be based on approved Planning Council policies and procedures that are consistent with federal and local laws and guidance, and subject to the availability of budgeted Planning Council Support funds.

Sample Expense Reimbursement Policy

The HIV Planning Council strongly supports full participation of unaligned consumers of Ryan White HIV/AIDS Program (RWHAP) Part A services as voting members of the Planning Council and its committees. Since financial barriers can prevent full participation, it is the policy of the Planning Council to reimburse consumer members of the Planning Council or its committees for actual, reasonable, direct expenses associated with attending Planning Council and committee meetings or other Council-sponsored events. Such reimbursement must be:

- Allowable under federal guidance and local laws and guidelines;
- Based upon the availability of funds in the Planning Council Support budget; and
- Provided only when reimbursement is not available from another source such as an employer.

Sample Expense Reimbursement Procedures

Member Eligibility*

The following categories of consumers are eligible for local expense reimbursements:

1. Unaligned consumer members of the Planning Council
2. Unaligned consumer members of the Planning Council's standing committees, including the Consumer Committee
3. Unaligned consumers who are specifically invited to make a presentation or provide input at a meeting of the Planning Council or one of its committees

Reimbursement of expenses cannot be provided for consumers who attend meetings as members of the public and do not have a role other than making a public comment if they choose to do so.

**Unaligned consumers* are individuals "who are receiving HIV-related services" from RWHAP Part A-funded providers, but "are not officers, employees, or consultants to any entity" with Part A funding "and do not represent any such entity." [Legislation, Section 2602(b)(5)(C)]

Allowable Expenses

Reimbursement can be provided for reasonable and necessary out-of-pocket expenses that are incurred by an eligible person in preparing for or participating in activities sponsored by the Planning Council, such as Planning Council meetings, committee meetings, special meetings, or

training sessions. This includes pre-approved participation in community events that support Planning Council goals and are related to the member's Planning Council responsibilities. The following expenses are typically reimbursable:

1. **Local Travel/Transportation:** Local travel is travel within the Part A jurisdiction. Mode of travel should be based on cost, time, and special consumer needs. Reimbursement will be provided for the following:
 - a. **For consumers who drive to meetings:**
 - 1) **Actual mileage** to and from a Planning Council or committee meeting or other Planning Council-sponsored event when a personal vehicle is used, with addresses of the starting and ending point provided on the invoice. Mileage for use of a personal vehicle is reimbursable at the federal rate, which as of January 1, 2020 is 57.5 cents per mile.
 - 2) **Tolls**, such as bridge or highway tolls, with an explanation of the toll.
 - 3) **Actual parking costs** of a personal vehicle used for transportation to a Planning Council or committee meeting or a Planning Council-sponsored activity; a dated receipt is required. Planning Council Support (PCS) will provide parking validation where feasible, so the consumer does not have to pay for parking or report parking costs.
 - b. **For consumers who take other types of transportation to meetings:**
 - 1) **Actual costs of public transportation** such as bus, metro, and/or commuter train fare, with a receipt or a valid ticket or pass, plus information on the starting and ending stops or stations.
 - 2) **Actual cost of taxi or ride share** with prior PCS approval, which will be given where less expensive methods are unavailable or would require a great deal of time in transit; a dated receipt is required.
2. **Child care expenses:** Reimbursement for the actual costs for care of a dependent child or children by a baby sitter or at a child care center, at a rate that is reasonable and customary.
 - a. Payment will be made for the period beginning up to one hour before and ending up to one hour after the meeting time unless a consumer has a longer travel time.
 - b. The maximum hourly rate will not exceed the amount paid for child care funded through Part A. If Part A is not funding child care, the maximum will be the established hourly rate paid for child care by local social service agencies.
 - c. Payment will not be made to the consumer's spouse or partner or to another family member that normally provides child care at no cost.
 - d. Reimbursement must be accompanied by a dated provider invoice and receipt that specifies who provided the care, who received the care, date and hours of care provided, cost per hour, and total cost, and either a signature or a separate receipt showing that payment was made. A sample Child Care Provider Invoice and Receipt Form is provided, but providers may use their own invoice and receipt forms if desired. *See Sample Child Care Provider Invoice and Receipt Form.*

3. **Other expenses:** The Planning Council may reimburse for other pre-approved expenses such as the following, which should be discussed individually with PCS staff. These costs must be budgeted in the appropriate PCS line item (e.g., communications).
 - a. **Communications or other office-type expenses** when they are necessary to enable a Planning Council member, especially a Planning Council or committee Chair or Co-Chair, to fulfill member responsibilities. For example, a consumer Co-Chair might be loaned a tablet or laptop or provided with a hotspot. A member might need equipment or internet access to connect to meetings that are held remotely.
 - b. **Meal costs** when the member is attending an event at the request of the Planning Council and food is not provided.
 - c. **Pre-approved long-distance travel** to an HIV-AIDS Bureau (HAB)-sponsored or -approved event, based on receipts for expenses and subject to the jurisdiction's long-distance travel policies and cost limits.

Administrative Process

1. **Confirmation of eligibility:** Consumers with a question about their eligibility for reimbursement or what activities are included should consult with the PCS manager to confirm their eligibility for expense reimbursement before the meeting or event.
2. **Requests for reimbursement:** To obtain reimbursement, an eligible consumer must complete an Expense Reimbursement Form, which can be found online, with instructions, in the Member Resources section of the Planning Council website, or obtained in hard copy from the PCS manager. Individuals must itemize expenses, attach appropriate receipts, and provide any necessary written explanation, depending on the type of expense. *See Sample Planning Council Consumer Expense Reimbursement Form*
3. **Timing of reimbursement requests:** Reimbursement forms should be submitted once a month, covering costs for the calendar month. Costs should be submitted as soon as possible and no more than 30 days after the end of the calendar month.
4. **Timing of reimbursement:** The Planning Council will provide expense reimbursement no more than 30 days after a complete and accurate invoice is submitted.
5. **Reimbursement via cash versus cards:** The Planning Council can reimburse mileage costs through either cash or a gas card with a value equal to the mileage reimbursement amount. Consumers can choose their preferred option, with the understanding that reimbursement via gas card will generally be quicker. Other local travel expenses will be reimbursed in cash.
6. **Special arrangements:** A consumer whose financial situation makes payment of expenses and the wait for reimbursement difficult should speak with the PCS manager. It may be possible for PCS to arrange and pay for transportation for the consumer, provide a bus or metro card, or provide rapid reimbursement.
7. **Monitoring of costs:** PCS staff will review reimbursement expenses with the Executive Committee, without identification of individual members, as part of the monthly financial review.
8. **Limits to reimbursements:** The Planning Council budgets funds for expense reimbursements based on the projected number of meetings and other Planning Council-sponsored activities

each year. These projections assume, for example, that consumer members of the Planning Council will typically attend the Planning Council meeting, Consumer Committee meeting, and up to one additional committee meeting each month, as well as three additional activities each year (Data Presentation, PSRA, and annual training/retreat). Different estimates are done for the Consumer Co-Chair and for Committee Co-Chairs. If expense expenditures exceed projections, the Planning Council may take action to limit these costs.

Sample Reimbursement Forms

Two sample forms have been provided that collect necessary information and can serve as models for your PC/PB's forms.

- Sample Planning Council Consumer Expense Reimbursement Form – for use by the consumer in requesting reimbursement for local travel-related costs and child care expenses
- Sample Child Care Provider Invoice and Receipt Form – for use by child care providers that do not have an invoice and receipt form on letterhead that provides needed information

If the expense reimbursement form is made available in Excel or another format that auto-calculates, this will help to minimize errors.

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