HRSA
Health Resources & Services Administration

Subrecipient Site Visit Monitoring

Division of State HIV/ AIDS Program (DSHAP)
Administrative Reverse Site Visit (ARSV)

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Vision: Healthy Communities, Healthy People

HRSA HIV/AIDS Bureau Vision and Mission

Vision

Optimal HIV care and treatment for all to end the HIV epidemic in the U.S.

Mission

Provide leadership and resources to advance HIV care and treatment to improve health outcomes and reduce health disparities for people with HIV and affected communities.

Ground Rules

- Interactive Session – Share your experiences
- Listen to others without interrupting
- Ask questions
  - Virtual participants can use the chat box or raise hand feature in zoom.

Overview

- Purpose of Monitoring
- Legislative Background
- National Monitoring Standards
- Monitoring Subrecipients
- Subrecipient Site Visits

Ice Breaker

How many years have you worked in your position?

Knowledge Check (1)

What is the purpose of subrecipient monitoring?

Purpose of Monitoring

- Federal requirement to ensure compliance with statutory requirements, regulations and policies
  - Review and test compliance with applicable laws, regulations, and policies
- Assess efficiency of operations
  - Make recommendations to enhance efficiency of agency operations, achieve program results, and lower risk
- Technical Assistance (TA) Identification and Provision
- Relationship building
  - Collaboration and Trust

Relevant Definitions

- **Federal awarding agency-** the federal agency that provides a federal award directly to a non-federal entity.
- **Recipient-** an entity, usually but not limited to non-federal entity, that receives a federal award directly from a federal awarding agency to carry out an activity under a federal program. **The term recipient does not include "subrecipient."**
- **Pass-through entities-** a non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program. **A pass-through entity may be a recipient or subrecipient.**
- **Subrecipient-** a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program.
- **Contractors-** an entity that receives a contract, which is a legal agreement by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award.

Uniform Administrative Requirements

The Uniform Administrative Requirements (UAR) clarifies the role the recipient and subrecipient regarding the following:

- 45 CFR §§ 75.326-75.340, particularly 45CFR §§ 75.326-75.329 (Procurement Standards)
  - Procuring property and/or service under a federal award must follow the same policies and procedures used for procurements from non-federal funds.
  - The state must comply with 45 CFR § 75.331 and ensure that every purchase order or other contract includes any clauses required by 45 CFR § 75.335.
  - All other non-federal entities, including subrecipients of a state, will follow 45 CFR §§ 75.327 - 75.335.

Uniform Administrative Requirements (2)

- 45 CFR §§ 75.341-75.343 – Performance and Financial Monitoring and Reporting
  - The non-federal entity is responsible for oversight of the operations of the federal award supported activities
  - The non-federal entity must monitor its activities under federal awards to assure compliance with applicable federal requirements and performance expectations are being achieved
  - Monitoring by the non-federal entity must cover each program, function or activity.

Uniform Administrative Requirements (3)

- 45 CFR § 75.351 – Distinguishing subrecipients from contractors
  - Subaward- is for the purpose of carrying out a portion of the federal award and creates a federal assistance relationship with the subrecipient
  - Contract- is for the purpose of obtaining goods and services for the non-federal entity's own use and creates a procurement relationship with the contractor
- 45 CFR § 75.352- Requirements for pass-through entities (for subrecipient monitoring)
  - Subrecipient must permit the pass-through entity to have access to records and financial statements
  - Subrecipient must evaluate risk of noncompliance with federal statutes, regulations and terms and conditions of the award

Uniform Administrative Requirements (4)

- 45 CFR § 75.364 – Access to records
  - "The Health and Human Services (HHS) awarding agency, Inspector General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts."

Monitoring Subrecipients (1)

- Recipients should use their monitoring process and legal agreement language to:
  - Establish expectations
  - Reinforce mutual obligations between the recipient and subrecipient.
  - Establish a monitoring process that designates a person or team to review:
    - ✓Fiscal and program reports
    - ✓Conduct site visits
    - ✓Communicate with subrecipient regularly and provide technical assistance (TA), as needed
    - ✓Implement a Corrective Action Plan (CAP), if necessary

Knowledge Check (2)

HRSA HAB requires subrecipients to receive an annual monitoring site visit. Which statement is false?

A. Desk audits can be conducted in place of an annual site visit
B. Client records are reviewed by random sampling
C. Site visits can include staff interviews or facility tours
D. Annual monitoring site visits are to be conducted annually

Monitoring Subrecipients (2)

- Monitoring process for subrecipients should be standardized, transparent and encompass monitoring and oversight activities to include:
  - ✓Compliance with scope of work
  - ✓Conducting desk compliance audits
  - ✓Analyzing performance reports
  - ✓Training of recipient and subrecipient staff
  - ✓Other required program and fiscal monitoring activities

Knowledge Check (3)

How often should subrecipient site visits occur?

Subrecipient Site Visit

- Develop Site Visit Procedure
  - Pre-Site Visit Activities
  - On-Site Visit Activities
  - Post-Site Visit Activities
- Develop a Site Visit Schedule
  - May use subrecipient risk assessments to guide schedule
- Develop Site Visit Tools
  - Administrative/Program
  - Fiscal
  - Use National Monitoring Standards as a guide

Monitoring Subrecipients (3)

- Recipients are required to conduct annual site visits to all subrecipients
  - Includes direct subrecipients, fiduciary agents, consortia lead agencies
  - Consider partnering with other RWHAP Parts
  - Exception: Recipients with an approved Annual Site Visit Exemption Request
- Site Visit Team
  - Administrative/Programmatic Reviewer
  - Fiscal Reviewer
  - Clinical Quality Management Reviewer (Suggested)
- Subrecipients must monitor sub-subrecipients for all the same requirements
  - This includes consortia lead agencies

Pre-Site Visit Activities

- Notify subrecipient in advance
- Review process with subrecipient prior to the visit
  - Monitoring team
  - Subrecipient participants
  - Dates and logistics of visit
  - Logistics of client interviews or feedback groups if appropriate
- Request documents to review before the on-site visit

On-Site Visit Activities

- Entrance meeting with all subrecipient participants
- Monitoring process
  - Use Administrative/Program and Fiscal review tools
  - Combine staff discussion and document review
  - Review client records or other documentation of service provision
  - Conduct client interviews or feedback groups, if appropriate
- Exit meeting
  - Inform subrecipient of compliance issues and opportunities for improvement

Post Site Visit Activities

- Site Visit Reports
  - Issue to subrecipients within a reasonable time period
  - Specify compliance issues that require correction
- Corrective Action Plans (CAPs)
  - CAPs should address compliance issues within a defined amount of time
  - Recipients should document resolution of compliance issues
- Schedule follow-up subrecipient visits as needed
- Consider a Site Visit Evaluation completed by subrecipients
  - Provides feedback to improve the monitoring process and values the subrecipient experience

Developing a Subrecipient Corrective Action Plan

- Develop a consistent format for discussion of requirements that did not meet compliance.
  - Clearly state the items that did not meet compliance.
  - List actions/ steps to correct the compliance issue.
    - ✓ Expected outcomes- use the specific, measurable, attainable, relevant, and time-bound "SMART" principles.
  - Determine who is responsible for correcting the compliance issue and timeline for completion.
- Meet with subrecipient to analyze the issues that do not meet compliance
  - Brainstorm solutions
  - Offer technical assistance

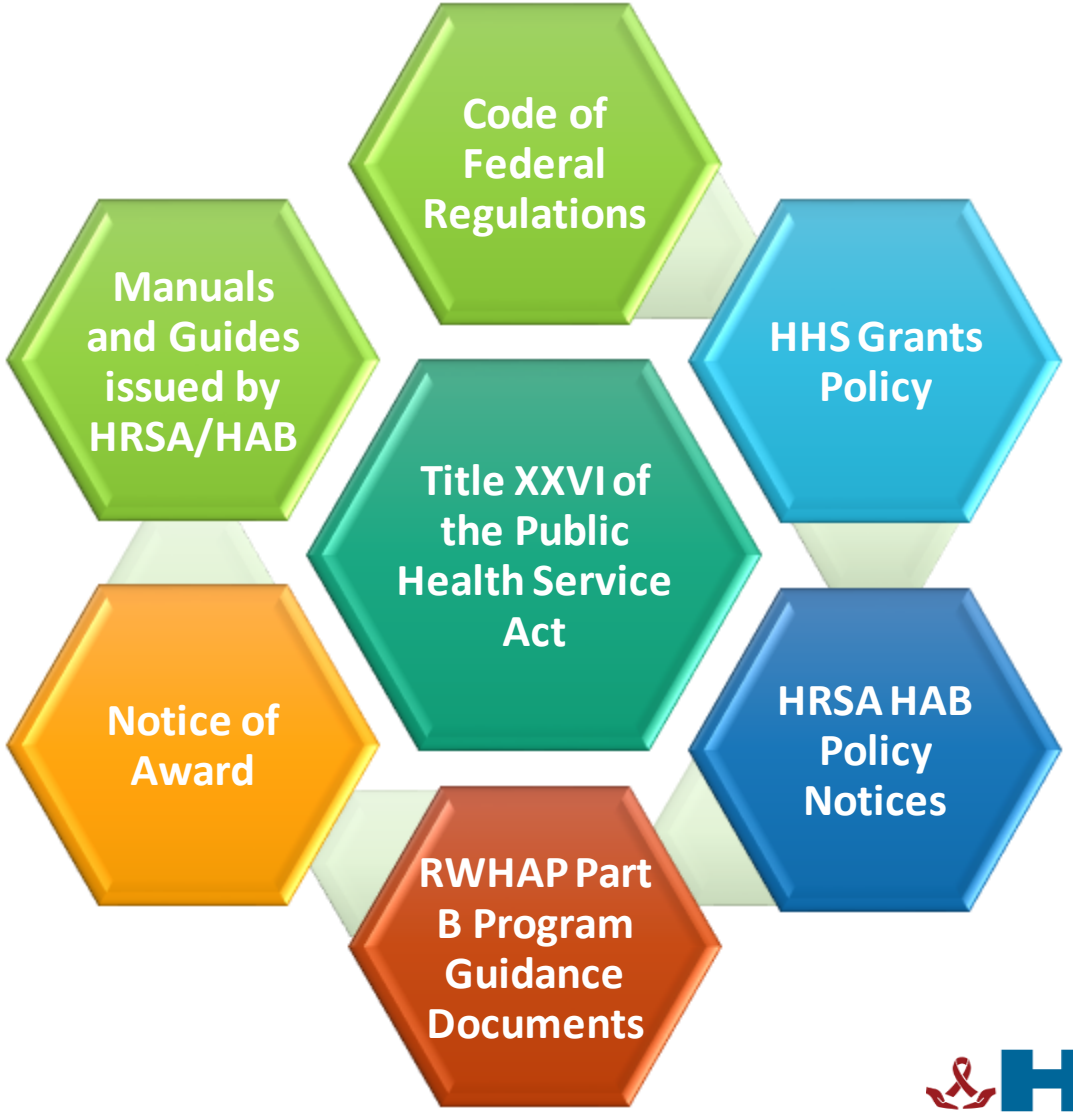
Subrecipient Corrective Action Plans (cont.)

- Reviewing the CAP before implementation to ensure all action items will be addressed.
- Follow up regularly to make sure CAP is being implemented
  - Schedule regular calls to review progress
  - Identify if additional TA, training or support is needed.
- Use of continuous quality improvement
  - This will help to identify areas for improvement.

National Monitoring Standards (NMS)

- Developed by HRSA HAB. A tool to provide guidance to recipients regarding monitoring expectations of recipients and subrecipients

- Define fiscal and program criteria to be monitored for compliance



National Monitoring Standards (cont.)

- Each requirement has the following components:
  - Suggested standard for meeting the requirement
  - Performance measures/methods guidance on how to meet the requirement
  - Recipient/ subrecipient responsibilities

- The NMS can support recipients and subrecipients in the following ways:
  - When preparing for recipient or subrecipient site visits
  - Developing subrecipient monitoring protocols and tools
  - Ensure recipients and subrecipients meet legislative, regulatory, and programmatic requirements.

Review Question 1

What area(s) are required to be reviewed during a subrecipient site visit?

Review Question 2

Who is responsible for monitoring the subrecipients of a lead agency/ consortia?

Review Question 3

What fiscal documents should be reviewed as part of the subrecipient site visit?

Review Question 4

If an Office of Inspector General (OIG) visit of a subrecipient resulted in repayment of federal funds, who is responsible for paying?

Review Question 5

What are some possible reasons a Corrective Action Plan (CAP) is developed when the subrecipient is not meeting certain compliance requirements?

Resources

- RWHAP Part B National Monitoring Standards
- RWHAP Part B Program Manual
- TargetHIV
- 45 CFR Part 75. 351- Subrecipient Monitoring and Management

Thank You! Questions

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