Allowable Uses of Funds of RWHAP Funds: A Closer Look at the Updated Service Categories

Policy Clarification Notice (PCN) #16-02 Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds

Tarsha Cavanaugh, Ph.D., MSW, LGSW, HRSA/HAB, Division of Policy and Data
Monique Hitch, MHSA, HRSA HAB, Division of Community HIV/AIDS Programs
Mark Peppler, MAHS, HRSA/HAB, Division of Metropolitan HIV/AIDS Program

2016 National Ryan Conference on HIV Care and Treatment
August 26, 2016
Disclosures

Presenter(s) has no financial interest to disclose.

This continuing education activity is managed and accredited by Professional Education Services Group in cooperation with HSRA and LRG. PESG, HSRA, LRG and all accrediting organization do not support or endorse any product or service mentioned in this activity.

PESG, HRSA, and LRG staff has no financial interest to disclose.
Vision
Optimal HIV/AIDS care and treatment for all.

Mission
Provide leadership and resources to assure access to and retention in high quality, integrated care, and treatment services for vulnerable people living with HIV/AIDS and their families.
HIV/AIDS Bureau Priorities

- **National HIV/AIDS Strategy (NHAS) 2020/President’s Emergency Plan for AIDS Relief (PEPFAR) 3.0** - Maximize HRSA HAB expertise and resources to operationalize NHAS 2020 and PEPFAR 3.0

- **Leadership** - Enhance and lead national and international HIV care and treatment through evidence-informed innovations, policy development, health workforce development, and program implementation

- **Partnerships** - Enhance and develop strategic domestic and international partnerships internally and externally

- **Integration** - Integrate HIV prevention, care, and treatment in an evolving healthcare environment

- **Data Utilization** - Use data from program reporting systems, surveillance, modeling, and other programs, as well as results from evaluation and special projects efforts to target, prioritize, and improve policies, programs, and service delivery

- **Operations** - Strengthen HAB administrative and programmatic processes through Bureau-wide knowledge management, innovation, and collaboration
Learning Objectives

At the conclusion of this activity, the participant will be able to:

• Review Policy Clarification Notice (PCN) #16-02 RWHAP Services: Eligible Individuals & Allowable Uses of Funds category definitions

• Apply the RWHAP PCN #16-02 service category clarifications in program implementation

• Describe where to find the RWHAP PCN #16-02 and supporting materials
Obtaining CME/CE Credit

If you would like to receive continuing education credit for this activity, please visit:

http://ryanwhite.cds.pesgce.com
Purpose of PCN #16-02 RWHAP Services: Eligible Individuals & Allowable Uses of Funds

• Ensure consistency of program service categories with RWHAP legislation

• Clarify service categories and program guidance related to services provided through the RWHAP

• Align service categories across HIV/AIDS Bureau documents, products, and activities

• Effective with Fiscal Year 2017 funding
Documents and Program Guidance Related to PCN #16-02

- Ryan White HIV/AIDS Program Services Report/AIDS Drug Assistance Program Data Reports (RSR/ADR)
- National Monitoring Standards
- Funding Opportunity Announcements
- RWHAP Part Manuals
- Program Terms in the Notice of Grant Awards (NoAs)
- Site Visits Modules
Background

• RWHAP legislation – Title XXVI of the Public Health Service Act

• 45 CFR Part 75—HHS Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards
  o §75.351 – 353—Subrecipient Monitoring and Management
  o Subpart E—Cost Principles
Eligible Individuals Served by the RWHAP

• The RWHAP serves low-income people living with HIV (PLWH) who are uninsured or underinsured

• Family members and affected individuals may be eligible for RWHAP services in limited situations, but these services must always be to support the health outcomes of a person living with HIV
Allowable Costs Related to PCN #16-02 – Service Categories*

- Store gift cards or vouchers
- Core medical and support services in PCN 16-02
  - Must relate to HIV diagnosis, care and support
  - Must adhere to HIV clinical practice standards and consistent with HHS treatment guidelines

*Note, these costs relate specifically to PCN #16-02, this is not an exhaustive list of unallowable costs, see 45 CFR Part 75, Subpart E—Cost
Unallowable Costs Related to PCN #16-02 – Service Categories*

- Cash payments to intended clients of RWHAP-funded services
- General-use prepaid cards (i.e. Visa, MasterCard)
- Gift cards that are cobranded with the logo of a payment network or affiliated with group of merchants
- Other unallowable costs, which include:
  - Clothing
  - Employment and Employment-Readiness Services
  - Funeral and Burial Expenses
  - Property Taxes

*Note, these costs relate specifically to PCN #16-02, this is not an exhaustive list of unallowable costs, see 45 CFR Part 75, Subpart E—Cost
PCN #16-02 Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds – Service Category Definitions

Core Medical Services
Support Services
# PCN #16-02 Service Categories Overview

| CORE MEDICAL                                                                 | SUPPORT                                                      |
|                                                                              |                                                              |
| • Outpatient/Ambulatory Health Services                                     | • Non-Medical Case Management Services                       |
| • AIDS Drug Assistance Program Treatments                                   | • Child Care Services                                        |
| • AIDS Pharmaceutical Assistance                                            | • Emergency Financial Assistance                             |
| • Oral Health Care                                                          | • Food Bank/Home Delivered Meals                             |
| • Early Intervention Services (EIS)                                          | • Health Education/Risk Reduction                            |
| • Health Insurance Premium and Cost Sharing Assistance for Low-Income Individual | • Housing                                                   |
| • Home Health Care                                                          | • Other Professional Services                                |
| • Home and Community-Based Health Services                                  | • Linguistic Services                                        |
| • Hospice Services                                                          | • Medical Transportation                                   |
| • Mental Health Services                                                    | • Outreach Services                                         |
| • Medical Nutrition Therapy                                                 | • Psychosocial Support Services                              |
| • Medical Case Management, including Treatment Adherence Services           | • Referral for Health Care and Support Services              |
| • Substance Abuse Outpatient Care                                           | • Rehabilitation Services                                   |
|                                                                              | • Respite Care                                              |
|                                                                              | • Substance Abuse Services (residential)                     |
PCN #16-02 Changes

• Service descriptions and names
  o Consistency with RWHAP statute
  o Non-medical Case Management

• Consolidation of some services
  o Pediatric Developmental Assessment
  o Treatment Adherence Services
  o Other Professional Services

• Greater detail provided for some
  • AIDS Pharmaceutical Assistance
  • Early Intervention Services
<table>
<thead>
<tr>
<th>RWHAP Core Medical Services</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Outpatient/Ambulatory Health Services</td>
<td>• AIDS Drug Assistance Program Treatments</td>
</tr>
<tr>
<td>• AIDS Pharmaceutical Assistance</td>
<td>• Oral Health Care</td>
</tr>
<tr>
<td>• Early Intervention Services (EIS)</td>
<td>• Medical Nutrition Therapy</td>
</tr>
<tr>
<td>• Home Health Care</td>
<td>• Home and Community-Based Health Services</td>
</tr>
<tr>
<td>• Hospice Services</td>
<td>• Mental Health Services</td>
</tr>
<tr>
<td>• Health Insurance Premium and Cost Sharing Assistance for Low-Income Individuals</td>
<td>• Medical Case Management, including Treatment Adherence Services</td>
</tr>
<tr>
<td>• Substance Abuse Outpatient Care</td>
<td></td>
</tr>
</tbody>
</table>
Outpatient/Ambulatory Health Services (OAHS)

Description:

- Diagnostic and therapeutic services provided directly to a client by a licensed healthcare provider in an outpatient medical setting
- Outpatient medical settings include clinics, medical offices, and mobile vans where clients do not stay overnight. Emergency room or urgent care services are not considered outpatient settings

Allowable services include:

<table>
<thead>
<tr>
<th>Service</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical history taking</td>
<td>Physical examination</td>
</tr>
<tr>
<td>Diagnostic testing, including laboratory testing</td>
<td>Prescription and management of medication therapy</td>
</tr>
<tr>
<td>Behavioral risk assessment, subsequent counseling, and referral</td>
<td>Treatment and management of physical and behavioral health conditions</td>
</tr>
<tr>
<td>Preventive care and screening</td>
<td>Pediatric developmental assessment</td>
</tr>
<tr>
<td>Treatment adherence</td>
<td>Education and counseling on health and prevention issues</td>
</tr>
<tr>
<td>Referral to and provision of specialty care related to HIV diagnosis</td>
<td></td>
</tr>
</tbody>
</table>
Early Intervention Services (EIS)

Description:

• The RWHAP legislation defines Early Intervention Services (EIS) for RWHAP Parts A, B, and C. See § 2651(e) of the Public Health Service Act

Guidance:

• Overlaps with other service category descriptions
• Combination of services, rather than stand-alone
Early Intervention Services (EIS): RWHAP Parts A and B

- RWHAP Parts A and B EIS services must include the following four components:
  - Targeted HIV testing
  - Referral services
  - Access and linkage to HIV care and treatment services
  - Outreach Services and Health Education/Risk Reduction
Early Intervention Services (EIS): RWHAP Part C EIS

- **RWHAP Part C EIS** services must include the following four components:
  - Counseling individuals with respect to HIV
  - High risk targeted HIV testing (confirmation and diagnosis of the extent of immune deficiency)
  - Referral and linkage to care of HIV-infected clients to Outpatient/Ambulatory Health Services, Medical Case Management, Substance Abuse Care, and other services as part of a comprehensive care system including a system for tracking and monitoring referrals
  - Other clinical and diagnostic services related to HIV diagnosis
Medical Case Management, Including Treatment Adherence Services

Description:

• Provision of a range of client-centered activities focused on improving health outcomes in support of the HIV care continuum

• May also provide benefits counseling by assisting eligible clients in obtaining access to other public and private programs for which they may be eligible
RWHAP AIDS Drug Assistance Program (ADAP) Treatments

Description:

• State-administered program authorized under Part B of the RWHAP to provide FDA-approved medications to low-income clients with HIV disease who have no coverage or limited coverage from private insurance, Medicaid, or Medicare

• Can be used to purchase health insurance for eligible clients and for services that enhance access to, adherence to, and monitoring of antiretroviral therapy. RWHAP ADAP recipients must conduct a cost effectiveness analysis to ensure that purchasing health insurance is cost effective compared to the cost of medications in the aggregate

• Eligible ADAP clients must be living with HIV and meet income and other eligibility criteria as established by the state
AIDS Pharmaceutical Assistance

- Divided into two categories, based on RWHAP Part funding:
  - Local Pharmaceutical Assistance Program (LPAP) is operated by a RWHAP Part A or B recipient or subrecipient
  - Community Pharmaceutical Assistance Program (CPAP) provided by a RWHAP Part C or D recipient
AIDS Pharmaceutical Assistance - LPAP

Description:

- Operated by a RWHAP Part A or B recipient or subrecipient
- A supplemental means of providing medication assistance when an RWHAP ADAP has a restricted formulary, waiting list and/or restricted financial eligibility criteria
Local Pharmaceutical Assistance Program (LPAP): Criteria for RWHAP Part A and B

• **RWHAP Part A or B recipients using the LPAP service category must establish the following:**
  - Uniform benefits for all enrolled clients throughout the service area
  - A recordkeeping system for distributed medications
  - An LPAP advisory board
  - A drug distribution system
  - A drug formulary approved by the local advisory committee/board
  - A client enrollment and eligibility determination process that includes screening for ADAP and LPAP eligibility with rescreening at minimum of every six months

• **Coordination with the state’s RWHAP Part B ADAP**
  - A statement of need should specify restrictions of the state ADAP and the need for the LPAP

• **Implementation in accordance with requirements of the 340B Drug Pricing Program and the Prime Vendor Program**
AIDS Pharmaceutical Assistance – CPAP

Description:
• Community Pharmaceutical Assistance Program is provided by a RWHAP Part C or D recipient
• The provision of long-term medication assistance to eligible clients in the absence of any other resources
• The medication assistance must be greater than 90 days
Community Pharmaceutical Assistance Program (CPAP): Criteria for RWHAP Part C and D

• RWHAP Part C or D recipients using this service category must establish the following:
  o A financial eligibility criteria and determination process for this specific service category
  o A drug formulary consisting of HIV primary care medications not otherwise available to the client
  o Implementation in accordance with the requirements of the 340B Drug Pricing Program and the Prime Vendor Program
Health Insurance Premium and Cost Sharing Assistance for Low-Income Individuals

Description:

• Provides financial assistance for eligible clients living with HIV to maintain continuity of health insurance or to receive medical and pharmacy benefits under a health care coverage program.

• The service provision consists of either or both of the following:
  o Paying health insurance premiums to provide comprehensive HIV Outpatient/Ambulatory Health Services and pharmacy benefits that provide a full range of HIV medications for eligible clients.
  o Paying cost-sharing on behalf of the client.
## RWHAP Support Services

<table>
<thead>
<tr>
<th>Non-Medical Case Management Services</th>
<th>Child Care Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Financial Assistance</td>
<td>Food Bank/Home Delivered Meals</td>
</tr>
<tr>
<td>Health Education/Risk Reduction</td>
<td>Housing</td>
</tr>
<tr>
<td>Other Professional Services</td>
<td>Linguistic Services</td>
</tr>
<tr>
<td>Medical Transportation</td>
<td>Outreach Services</td>
</tr>
<tr>
<td>Psychosocial Support Services</td>
<td>Respite Care</td>
</tr>
<tr>
<td>Rehabilitation Services</td>
<td>Substance Abuse Services (residential)</td>
</tr>
<tr>
<td>Referral for Health Care and Support Services</td>
<td></td>
</tr>
</tbody>
</table>
Non-Medical Case Management

Description:

• Provide guidance and assistance in accessing medical, social, community, legal, financial, and other needed services

• Assist eligible clients to obtain access to other public and private programs for which they may be eligible, such as Medicaid, Medicare Part D, and others
Emergency Financial Assistance

Description:

• Provides limited one-time or short-term payments to assist the RWHAP client with an emergent need for paying for essential utilities, housing, food (including groceries and food vouchers), transportation, and medication

• Can occur as a direct payment to an agency or through a voucher program
Health Education/Risk Reduction

Description:
• Includes sharing information about medical and psychosocial support services and counseling with clients to improve their health status. Topics covered may include:
  o Education on risk reduction strategies to reduce transmission such as PrEP for clients’ partners and treatment as prevention
  o Education on healthcare coverage options (e.g., qualified health plans through the Marketplace, Medicaid coverage, Medicare coverage)
  o Health literacy
  o Treatment adherence education
Outreach Services

Description:
• Provision of the following 3 activities:
  o Identification of people who do not know their HIV status and linkage into OAHS
  o Provision of additional information and education on health care coverage options
  o Reengagement of people who know their status into OAHS
Other Support Services

Other Professional Services

• Such services may include and are not limited to:
  o Legal services
  o Permanency planning
  o Income tax preparation services

Referral for health care and support services

• Directs a client to needed core medical or support services
• Includes referrals to assist eligible clients to obtain access to other public and private programs
Recap

• Policy Clarification Notice #16-02 Eligible Individuals & Allowable Uses of Funds http://hab.hrsa.gov/

• Effective with Fiscal Year 2017 funding

• Resources
  o Frequently Asked Questions
  o Contact your Project Officer
Questions/Discussion

??
THANK YOU

- Tarsha Cavanaugh, Ph.D, MSW, LGSW
  HRSA/HIV AIDS Bureau
  Division of Policy and Data
  tcavanaugh@hrsa.gov

- Mark Peppler, MAHS
  HRSA/HIV AIDS Bureau
  Division of Metropolitan HIV/AIDS Programs
  mpeppler@hrsa.gov

- Monique G. Hitch, MHSA
  HRSA/HIV AIDS Bureau
  Division of Community HIV/AIDS Programs
  mhitch@hrsa.gov