

Miami-Dade County Office of Management and Budget-Grants Coordination Ryan White Program

Comprehensive Monitoring Instrument

(Review of Fiscal, Programmatic, and Administrative Operations For Allowability, Allocability, and Reasonableness)

SECTION I: SUBRECIPIENT INFORMATION							
Subrecipient Name:							
Official Contact Pers	on:				Phone number:		
Official Contact Title:					Address:		
		SECTION II:	CONT	RACT	INFORMAT	ION	
Contract period(s) covered by monitoring visit(s):			Ryan White Service Category monitored during visit:				
Contract Number:			Service Contra				
Contract Type:		Continuation New Contract	Date(s Visit:) of M	onitoring		
		SECTION III: LC	GISTIC	S OF	MONITORIN	IG VISIT	
		Miami-	-Dade C	ounty	Monitors		
Name		Title	Name			Title	

Subrecipient Facility(s) Visited							
Facility #1		Fac	lity #2	Facility #3			
Address:	,	Address:		Address:			
Date(s):	[Date(s):		Date(s):			
Time(s):	-	Γime(s):		Time(s):			
Facility #4		Fac	lity #5	Facility #6			
Address:	,	Address:		Address:			
Date(s):		Date(s):		Date(s):			
Time(s):		Time(s):		Time(s):			
	1						
		Entrance/E	xit Interviews				
Entrance Interview Conducted? ☐ Yes ☐ No	Date:	Con	Comments:				
		Parti	cipants				
NI							
Name		7	itle	Organization			
Name		7	-itle	Organization			
Name		1	-itle	Organization			
Name		7	-itle	Organization			
Name		7	-itle	Organization			
Name		7	-itle	Organization			
Exit Interview Conducted? Yes \(\square \) No	Date:		nments:	Organization			
Exit Interview Conducted?	Date:	Cor		Organization			
Exit Interview Conducted?	Date:	Cor	nments:	Organization			
Exit Interview Conducted? Yes No	Date:	Cor	nments:				

	SECTION IV: REVIEW OF BUILDING MAINTENANCE / ACCESSI			_	NAGEMENT
is ev	subrecipient's ability to provide services in a location the valuated. [NOTE: Throughout this monitoring tool, a compliance with the specified requirements. "No" requirement is not applicable to the subrecipient.]	"Yes"	respo	nse ir	ndicates that the subrecipient
	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	Is each facility that was visited accessible by public transportation?				
2	Is each subrecipient's facility that was visited during this site visit clean, well maintained, and safe?				
3	Is each facility that was visited physically accessible to the disabled? Ramp? Elevator if multiple floors?				
4	Are all hallways, doorways, entrances, ramps, steps and corridors clear and unobstructed with adequate lighting?				
5	Does the waiting room have adequate and appropriate seating?				
6	Are the hours of operation posted in an area to which clients have free access?				
7	Did listed hours of operations include the required four (4) hours outside of regular business hours?				
8	Does the Subrecipient have Grievance Procedures posted in an area to which clients have free access?				
9	Does the Subrecipient have the Client Rights and Responsibilities posted in an area to which clients have free access?				
10	Has subrecipient posted a notice informing clients and employees of their right to file any complaints of ADA Title II or Title III violations directly with the U.S. Department of Justice via email, fax, or phone within 180 days of the date of alleged discrimination?				
11	Does the subrecipient identify, in the case of an				

conditions, etc.), an alternative location for each

Are facility inspection reports free from any areas of concern or non- compliance? (e.g., fire, health, elevator, etc.) Is a written procedure in place to ensure timely reporting and tracking of all potential onsite risks or incidents (both medical and non-medical) which could exposure the subrecipient to risk of liability and/or loss? Does the Subrecipient have a current Local Business Taxes (formerly known as Occupational License); or documentation of exemption from Local Business Taxes – for non-profit education or charitable non-profit entities? Does the Subrecipient have a current Life Safety Operating Permit [annual review by the Miami-Dade County Fire Rescue Department of fire standards such as occupancy limit, fire alarm systems, fire extinguishers, sprinkler systems, elevator system (if applicable), and other life safety factors such as ingress and egress requirements]? Does the Subrecipient maintain an incident, Injury, and Hazard Management Tracking and Reporting Policy and incident log? Does the Subrecipient have a Continuity of Operations Plan (COOP) or Emergency Preparedness Plan?		SECTION V: REVIEW OF SUBRECIPIENT'S BILLING PRACTICES								
Checked annually for fire and safety risks?										
Are facility inspection reports free from any areas of concern or non- compliance? (e.g., fire, health, elevator, etc.) Is a written procedure in place to ensure timely reporting and tracking of all potential onsite risks or incidents (both medical and non-medical) which could exposure the subrecipient to risk of liability and/or loss? Does the Subrecipient have a current Local Business Taxes (formerly known as Occupational License); or documentation of exemption from Local Business Taxes (formerly known as Occupational License); or documentation of exemption from Local Business Taxes – for non-profit education or charitable non-profit entities? Does the Subrecipient have a current Life Safety Operating Permit [annual review by the Miami-Dade County Fire Rescue Department of fire standards such as occupancy limit, fire alarm systems, fire extinguishers, sprinkler systems, elevator system (if applicable), and other life safety factors such as ingress and egress requirements]? Does the Subrecipient maintain an incident, Injury, and Hazard Management Tracking and Reporting Policy and incident log? 18 Does the Subrecipient have a Continuity of Operations Plan (COOP) or Emergency Preparedness Plan? Outpatient/Ambulatory Health Services, Medical Case Management, and Oral Health Care, and Pharmaceutical Services Subrecipients ONLY	21	access after regular business hours and on weekends								
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Checked annually for fire and safety risks?		Outpatient/Ambulatory Health Services, Medical Case Management, and Oral Health Care, and								
Checked annually for fire and safety risks?	18									
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	13	concern or non- compliance? (e.g., fire, health, elevator,								
Is there decumentation that subrecipient facilities are	12	Is there documentation that subrecipient facilities are checked annually for fire and safety risks?								
facility within the area, where they have the ability to initiate, maintain, and sustain operations for at least 30 days?		initiate, maintain, and sustain operations for at least 30								

In this section, the subrecipient's compliance with billing requirements is evaluated to ensure that the Ryan White Program is the payer of last resort. OMB-RWP monitoring staff reviewed billing policies (including Medicaid and Medicare, where applicable), reimbursement billing, supporting documentation (including progress notes). In addition, OMB-RWP monitoring staff reviewed Subrecipient's records to identify if any client or potential client was refused services. All items were found to be in compliance except as noted below, if applicable.

	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	Are the services billed to the Ryan White Program consistent with the subrecipient's contracted Scope of Services for the contract period being monitored?				
2	Does the subrecipient maintain proper supporting documentation for all units billed to the Ryan White Program? (see Billing Audit Chart Review and Summary sections)				
3	Are the dates that the progress notes are entered in Provide Enterprise Miami consistently done on the same day as the provision of service, or within two (2) business days of the service date, excluding holidays and weekends? [If NO, indicate in billing review observations table]				
4	Does the subrecipient's Financial Accounting Policies and Procedures include a section addressing Billing and Collection? [If YES, request a copy of the section]				
5	Does the subrecipient have a Third Party Payer policy regarding billing? (see Section XII - Fiscal Management)				
6	Does the subrecipient have written procedures for follow-up on denied third party payment claims?				
7	Is the Ryan White Program always used as payer of last resort?				
8	Does the subrecipient consistently and systematically screen Ryan White Program clients for other payer sources (such as private insurance, Medicaid, Medicare, other benefit programs, etc.)?				
9	Does the subrecipient offer Medicaid reimbursable services? [If YES, specify the services.]				
10	Is the subrecipient eligible and authorized to bill Medicaid? [If YES, indicate the Subrecipient's Medicaid Provider Number.]				
11	Does the subrecipient offer Medicare reimbursable services? [If YES, specify the services.]				

12	Medicare ⁶	brecipient eligib ? [If YES, i Provider Numl	ndicate sub							
13	White F covered s	ursement reques Program exclusions rouservices if the clarific results of the clarific requirements of	de Medicaio ient is determ	l/Medicare-]				
14	regarding	e subrecipient the pursuit of reimbursement?	retroactive M]				
15	document billing? [If	#14 above, does Medicaid and YES, specify hedicare billings	or Medicare www.retroactive	retroactive • Medicaid]				
16	reconcile	orecipient have a with the Ryan e claims have a copy]	White Part A	/MAI once]				
17		subrecipient hav s to clients?	e written policy	on refusal]				
18	limited to possession	#17, are the reas verbal abuse, the on of illegal sub ent's property? [I	reatened physostances or w	sical abuse, eapons on]				
19		Subrecipient ma sed services?	intain a file of	clients who]				
20	ensures t	 Subrecipient hat clients with with VA benefits 	a pre-existing	conditions]				
		Λ	ledical Case	Managemen	ıt Su	bre	cipien	its ONL	.Y	
21	Is there proof that the subrecipient regularly conducts Medifax or Medicaid Eligibility Verification System (MEVS) queries to determine if clients are currently enrolled in Medicaid?]				
	Summary of Billing Review Findings									
	Based on Appendix A of the Comprehensive Monitoring Instrument									
	(Verification of Documentation of Service Units Billed to Ryan White Program)									
Billin visit)		of Review (indicate	ate Month and	Year of Reim	burs	eme	nt Red	quests r	eviewed during	this monitoring
	Α	В	С	D			E		F	G

Ryan White Program Service Category	am Units Billed Revice		Percentage Reviewed Out of Total Units Billed During Month Sampled (column C ÷ column B)	Number of Questionable Units from Billing Review (Supporting documentation not found in client chart)	Total Dollar Value of Questionable Units	Percentage of Questionable Units Out of Total Number of Units Reviewed (column E ÷ column C)
			Grand Total:			

Summary of Billing Review Observations Based on Appendix A of the Comprehensive Monitoring Instrument					

SECTION VI: REVIEW OF DOCUMENTATION OF CLIENT ELIGIBILITY FOR RYAN WHITE PART A/MAI PROGRAM-FUNDED SERVICES Client charts are reviewed to determine the subrecipient's compliance with Ryan White Program client eligibility

requirements as detailed in the corresponding Professional Services Agreement, Scope of Services, and local Ryan White Program Service Delivery Guidelines.

SAMPLE SIZE	
Total number of client charts reviewed during this site visit	
Total number of unduplicated clients served by Subrecipient during the review period	
Sample size percentage (%) (Item 1. ÷ 2.)	

Notes from Client Eligibility Review

Based on Appendix B of the Comprehensive Monitoring Instrument

CIS#	Comments	Eligibility Assessment Dates	Agency Completing Assessment
-			

SECTION VII: REVIEW OF SUBRECIPIENT'S OPERATING POLICIES A review of the subrecipient's policies is conducted to ensure that proper operating procedures are in place. Comments/Findings/ Area of Evaluation Yes No N/A **Observations** Does the subrecipient have a written Operational 1 Policies and Procedures? [If YES, specify the date of the last update.] Does the subrecipient have a written Drug-Free 2 Workplace Policy? Does the subrecipient have a written Equal 3 Employment Opportunity and/or Affirmative Action Policy? Does the subrecipient have a written Sexual & 4 Unlawful Harassment Policy? Does the subrecipient have a written Code of Ethics and/or other policy that addresses: a. Anti-kickback Statute 5 b. Fraud, Waste, and Mismanagement c. Conflict of Interest and Nepotism d. Client Confidentiality Procedures Did the subrecipient have no violations of any policies 6 listed in #5 above reported? Does the subrecipient have written policies and procedures in compliance with Health Insurance 7 Portability and Accountability Act of 1996 (HIPAA) rules and regulations? Does the subrecipient have written policies addressing

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access to public records?

9	Can the subrecipient show proof that they are incorporating the required disclaimer to any statement, press releases, or any other publication supported wholly or partially by HRSA funding? [If YES, Request a copy]			
	Does the subrecipient have a written Policy and Procedures for informal complaints and formal grievances that includes, at a minimum the following:			
	a. Non-binding procedure for resolving conflicts			
	 Separate processes for informal complaints and formal grievances 			
	 Reasonable timeline for addressing complaints and grievances 			
10	 d. Description of the types of grievances and individuals covered 			
	 e. Meeting between the grievant and the Executive Director, or a Board 			
	 f. Written subrecipient response to the grievant or the grievant's care 			
	g. That instances of a client being denied services, regardless of whether the client had a grievance, both verbal or written, are documented in writing to include, reason and final outcome, and forwarded to the Recipient (Miami-Dade County Ryan White Program)			
11	Do the Grievance Policies and Procedures specifically address client grievances or complaints?			
12	How many <u>client</u> informal complaints and formal grievances were logged during the grant fiscal year? How many resolved?			
13	Do the Grievance Policies and Procedures specifically address <u>staff</u> grievances or complaints?			
14	How many <u>staff</u> informal complaints and formal grievances were logged during the grant fiscal year? How many resolved?			
15	Does documentation exist regard each complaint/grievance?			
16	Does documentation exist showing resolution of each complaint/grievance?			
17	Does documentation exist showing clients were given a copy of the grievance procedures, and they have been explained to them and they acknowledge their understanding?			

18	Does the subrecipient have a written policy regarding general outreach for client recruitment and to inform clients of available services?								
19	Does the subrecipient have a written policy regarding workplace violence?								
20	Does the subrecipient have a written whistle-blower policy?								
21	If the subrecipient is a Medicaid or Medicare provider, does it have a Corporate Compliance Plan?								
22	Can the subrecipient show documentation that written referral relationships exist between their Ryan White Part A program and key points of entry as defined in the HRSA Monitoring Standards and the local Ryan White Program Service Delivery Guidelines referenced in the corresponding contract for:								
	a. Emergency rooms								
	 Substance abuse and mental health treatment programs 								
	c. Detoxification centers								
	d. Adult and juvenile detention facilities								
	e. Sexually Transmitted Disease Clinics								
	f. Homeless shelters								
	g. HIV disease counseling and testing sites								
	Part A or MAI-funded Outreach S	ervice	Subre	cipient	s ONLY				
23	Can the subrecipient show documentation that written referral relationships exist between their Ryan White Part A program and key points of entry as defined in the HRSA Monitoring Standards and the local Ryan White Program Service Delivery Guidelines referenced in the corresponding contract for:								
	a. Hospital discharge clinics/departments								
	 Jail and/or correctional facilities, including, but not limited to, re-entry programs Federally Qualified Health Centers (FQHCs) 								
	For Food Bank and Residential Substance Abuse Treatment Subrecipients ONLY								

24	Do the subrecipient's policies and procedures address Miami-Dade County Resolution No. R-478-12, that prohibits Miami-Dade County from contracting with any food program that uses meat products that contain "pink slime" (low-grade beef trimmings commonly added to ground beef).	t V]								
	SECTION VIII: REVIEW OF CLIENT PARTICIPATION IN THE SUBRECIPIENT'S OPERATIONS										
	view is conducted of the subrecipient's efforts to involubrecipient and in the decisions made regarding services.				populat	ions served in the operations of					
	Area of Evaluation	Yes	N	Ю	N/A	Comments/Findings/ Observations					
1	Does the subrecipient perform any internal needs assessment activities? What type of activity is conducted and what is the frequency of the activity?										
2	Does the subrecipient have a mechanism in place to monitor and respond to clients' level of satisfaction with services provided by the organization (i.e., client satisfaction survey, comment cards, suggestion box, focus group, etc.)?		[
	Does the subrecipient have written procedures to involve the client in the decision-making process										
	Consumer representatives in the Board of Directors										
3	b. Client Advisory Board										
	c. Client Satisfaction Survey		[
	d. Specify other										
4	Is there documentation that an analysis has been conducted and program enhancements have been implemented as a result of client needs assessments?										
5	Is there documentation that results of the analyses above are reported to the Board of Directors? [Request Board Meeting minutes]										
	SECTION IX: REVIEW OF SUBRECIPIENT'S BOARD OF DIRECTORS' ACTIVITIES										
	A review is conducted of the subrecipient's Board an active Board functioning in the best inte	l of Di	recto	ors' a	activities						
	Area of Evaluation	Yes	No	N/A	A	Comments/Findings/ Observations					

1	Does the subrecipient have a list of its current Board of Directors? [If YES, request and attach a copy]		
2	If YES to #1, does the list include a breakdown of gender, race, and ethnicity? [If NO, request a demographic breakdown]		
3	Is the demographic breakdown of the Board of Directors representative of the subrecipient's client population?		
4	Is the subrecipient's Board of Directors comprised of the required number of members per the subrecipient's By-laws? Obtain a copy of the By-laws page that addresses number of members.		
5	Does the subrecipient's Board of Directors meet regularly? [Request and attach a copy of the last three (3) meeting minutes.]		
6	Do the Board of Directors' By-laws reference Ethics and Standards of Conduct?		
7	Do the Board of Directors' By-laws reference transparency in financial transactions between Board members, their businesses, and the non-profit organization?		

SECTION X: REVIEW OF SUBRECIPIENT'S ADHERENCE TO NATIONAL CULTURALLY AND LINGUISTICALLY APPROPRIATE SERVICES STANDARDS

A review of the subrecipient's ability to adhere to the 15 enhanced national standards for culturally and linguistically appropriate services (CLAS), indicated below, as set forth by the U.S. Department of Health and Human Services, Office of Minority Health (OMH) aimed at developing culturally appropriate systems of care. This section also evaluates how well the organization meets the CLAS standards. [For each standard below, Reviewers will view each organization's response in the most recent Ryan White Program Annual Progress Report and request documentation or review example(s) of each YES response.]

	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
	PRINCIPAL STA	NDAR	D		
1	Does the subrecipient provide effective, equitable, understandable, and respectful quality care and services that are responsive to diverse cultural health beliefs and practices, preferred languages, health literacy, and other communication needs?				
	GOVERNANCE, LEADERSHIP AND	WORK	FORC	E STA	ANDARDS
2	Does the subrecipient advance and sustain organizational governance and leadership that promotes CLAS and health equity through policy, practices, and allocated resources?				
3	Does the subrecipient recruit, promote, and support a culturally and linguistically diverse governance, leadership, and workforce that are responsive to the population in the service area?				
4	Does the subrecipient educate and train governance, leadership, and workforce in culturally and linguistically appropriate policies and practices on an ongoing basis?				
	COMMUNICATION AND LANGUAGE	ASSIS	STANC	CE ST	ANDARDS
5	Does the subrecipient offer language assistance to individuals who have limited English proficiency and/or other communication needs, at no cost to them, to facilitate timely access to all health care and services?				
6	Inform all individuals of the availability of language assistance services clearly and in their preferred language, verbally and in writing?				
7	Does the subrecipient ensure the competence of individuals providing language assistance, recognizing that the use of untrained individuals and/or minors as interpreters should be avoided?				
8	Are the interpreters that the subrecipient uses:				

	a. Family or friends of the client?				
	b. Bilingual staff?				
	c. Face-to-Face Volunteers?				
	d. Face-to-Face Professional Interpreter?				
	e. Telephone language assistance?				
9	Can the subrecipient show evidence that all interpreters have been appropriately trained to provide such service? [If YES, request a copy of the proof]				
10	Does the subrecipient provide easy-to-understand print and multimedia materials and signage in the languages commonly used by the populations in the service area?				
	ENGAGEMENT, CONTINUOUS IMPROVEMENT,	, AND	ACCC	UNTA	BILITY STANDARDS
11	Does the subrecipient have established culturally and linguistically appropriate goals, policies, and management accountability, and infuse them throughout the organization's planning and operations?				
12	Does the subrecipient conduct ongoing assessments of the organization's CLAS-related activities and integrate CLAS-related measures into measurement and continuous quality improvement activities?				
13	Does the subrecipient collect and maintain accurate and reliable demographic data to monitor and evaluate the impact of CLAS on health equity and outcomes and to inform service delivery?				
14	Does the subrecipient conduct regular assessments of community health assets and needs and use the results to plan and implement services that respond to the cultural and linguistic diversity of populations in the service area?				
15	Does the subrecipient partner with the community to design, implement, and evaluate policies, practices, and services to ensure cultural and linguistic appropriateness?				
16	Does the subrecipient create conflict and grievance resolution processes that are culturally and linguistically appropriate to identify, prevent, and resolve conflicts or complaints?				
17	Does the subrecipient communicate the organization's progress in implementing and sustaining CLAS to all stakeholders, constituents, and the general public?				

SECTION XI: REVIEW OF SUBRECIPIENT'S PERSONNEL POLICIES AND PROCEDURES

A review of the subrecipient's capabilities to manage human resources and compliance with its own personnel policies and procedures is conducted as part of this monitoring visit. This review also determines the subrecipient's documentation of required employee testing, qualifications, licenses, and training.

	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	Does the subrecipient have a written Personnel Policies and Procedures? [If YES, specify the date of the last update.]				
2	Does the subrecipient have a written policy to prohibit lobbying by staff whose salaries are covered in whole or in part by Federal funds?				
3	Does the subrecipient have a written policy to discourage hiring staff who have been convicted of a felony?				
4	Does the subrecipient have a written policy to avoid hiring persons who are under investigation by Medicaid or Medicare?				
5	Does the subrecipient have a written policy to discourage large signing bonuses?				
6	Does the subrecipient have established job descriptions for all Ryan White Part A Programfunded staff?				
7	Are the job descriptions in compliance with Ryan White Program qualification requirements for direct service personnel (where applicable)? [Review a sample of the job descriptions against the Ryan White Service Delivery Manual for the corresponding fiscal year.]				
8	Are Equal Employment Opportunity, Workers' Compensation, Family Leave Act, and other mandated or relevant information conspicuously displayed by the subrecipient?				
9	Are professional licenses for Ryan White Program- funded staff current and appropriate for the services provided by the organization (as applicable)?				
10	Does the subrecipient have excessive or significant staff turnover? [If YES, explain how the subrecipient has addressed this issue?]				
11	Does the subrecipient have written policy for screening staff who are wholly or partially funded under Federal grants to assure they are not on the Exclusion Lists at https://www.sam.gov and www.exclusions.oig.hhs.gov ?				

12		recipient enforce and follow the personnel policies and procedures?							
	License Sampling Audit								
Sa	Sample up to 6 staff; more if needed depending on the size of the subrecipient's organization and number of funded services or concerns.								
	License #:	Expiration Date:	Comments/Findings/ Observations	Corrective Action/ Recommendation					
		Notes from Personnel Red Based on Appendix C of the Comprehens		ent					
5	Staff Person	Finding	Corre	ective Action					

SECTION XII: REVIEW OF SUBRECIPIENT'S FISCAL MANAGEMENT

A review of the subrecipient's fiscal management practices is conducted to determine the organization's fiscal stability and its compliance with HHS 45 CFR 75 requirements based on the federal Uniform Guidance codified in 2 CFR 200, Generally Accepted Accounting Principles (GAAP), approved Ryan White Part A budget(s), and internal policies and procedures. This review also determines if the subrecipient has procedures in place to protect its assets from fraud, waste, abuse, unnecessary expenditures, duplicate payments, etc.

GENERAL						
	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations	
1	Are the subrecipient's financial books, accounting records and supporting documentation maintained in accordance with Generally Accepted Accounting Principles (GAAP)?					
2	Does the subrecipient have Fiscal Accounting Policies and Procedures? [If YES, specify the date of the last update.]					
	If YES to #2 directly above, do the Fiscal Accounting Policies and Procedures cover: (check all that apply)					
3	a. applicable Uniform Guidance cost principles					
3	allowable, allocable and reasonable costs					
	b. Third Party Payers					
	c. purchasing and procurement					
	d. fixed assets					
	e. accounts receivable					
	f. accounts payable					
	g. check signing protocol					
	h. imposition of client charges and program income					
4	Is the distribution of fiscal duties adequate to safeguard the subrecipient's assets (i.e., are there separate staff members responsible for opening the mail, approving the expense, recording the expense, cutting the check for payment, mailing the payment, making deposits, etc.)? [Request a copy of the subrecipient's current organizational chart and trace a sample check, matching the staff to each function.]					
5	What accounting system does the subrecipient use?					
6	When was it implemented?					
	Does the accounting system identify in its accounts:					
7	a. Federal Award Identification Number (FAIN)					
•	b. Award Year					
	c. Federal Awarding Entity					

	d. Pass Through Entity		
	e. CFDA Number and Title		
8	Where are they identified? [Request a sample copy]		
9	Is a cost basis or accrual method of accounting used? (CHECK ONE)		
	☐ Cost Basis ☐ Accrual		
10	Does the subrecipient have the general ledger and balance sheets for the month(s) OMB is sampling? [Request a copy of each]		
11	Do the interim financial reports indicate expenses such as professional fees, legal fees, interest, penalties, and loans to employees?		
12	Does the agency have a chart of accounts? [Request a copy]		
13	Does the chart of accounts support proper allocation of revenue and expense categories properly identified by program (funding source)?		
14	Is there an account established for the Ryan White Part A (and MAI, if applicable) Program funding? [If YES, what is the corresponding Ryan White Program account code(s)]		
15	Does the chart of accounts have an unallowable or undistributed expense cost code to properly identify unallowable costs or other costs not covered by the subrecipient's funder (such as late fees, interest, penalties, loans to employees and bank charges)? [Review fiscal reports requested above to verify compliance]		
16	If YES to #15 directly above, were no unallowable costs expenses booked (allocated) to the Ryan White Program?		
17	Does the subrecipient have a cost allocation methodology in writing and is it representative of the allocation used? [Request a copy of the cost allocation plan and test several different expenses to determine compliance with the approved cost allocation plan (allocations, supporting documentation, etc.).]		
18	Does the subrecipient charge the appropriate indirect costs to each program (funding source) in relation to the size of the funded program? [See the cost allocation plan or other related subrecipient documentation.]		
19	Does the subrecipient have a system in place to monitor expenses versus client utilization to determine reasonable costs (fair share) charged to the Ryan White		

	Part A/MAI Program?							
20	What process does the subrecipient follow to address situations where actual expenditures exceed or fall short of the approved Ryan White Part A budget?							
21	Does the subrecipient adhere to the funding limits set in the approved Ryan White Part A service categories?							
	NON-PROFIT and TAX-EXEM	IPT ST	ATUS					
22	Is the agency a non-profit organization?							
23	If YES to #22 directly above, does the subrecipient have documentation as proof? [e.g., 501(c)3 letter, etc.] [If NO, skip to the Bank section]							
24	What documentation was provided?							
	For the following questions, Reviewers must access the Internal Revenue Service's (IRS) Tax Exempt Organization Search (formerly Select Check; EO Select Check) at https://www.irs.gov/charities-non-profits/tax-exempt-organization-search							
25	Is the subrecipient eligible to receive tax-deductible charitable contributions?							
26	Does the subrecipient do a review of the Auto Revocation list, to confirm that the subrecipient has not had its federal tax exemption automatically revoked for not filing an annual Form 990-series return or notice for three consecutive years?							
27	If applicable, has the subrecipient filed a Form 990-N (e-Postcard) annual electronic notice? (Note: most small organizations whose annual gross receipts are normally \$50,000 or less are only required to electronically submit Form 990-N, unless they choose instead to file a completed Form 990 or Form 990- EZ.)							
	BANKING PRACTIC	ES						
28	Are bank statements reconciled in a timely manner (i.e., within 30 days)? [Indicate the statement months reviewed for this "Bank" section] How long after the monthly bank statement is a reconciliation done?							
29	Are bank reconciliations signed by the preparer and his/her immediate supervisor?							
30	Are adjustments properly documented and explained?							
31	Are checks pre-numbered and used in consecutive order as indicated on bank statements?							
32	Do bank statements reflect a positive balance at the end of the month?							
33	Are bank statements free of returned checks or overdraft fees due to insufficient funds?							
34	If NO to #33 directly above, were none of these fees							

	and/or charges allocated to the Ryan White Program?						
35	Are there no transfers to accounts, personal in particular, other than for payroll on all of the bank statements? [Reviewers, visually confirm this on the bank statements for the months sampled.]						
36	Does the subrecipient have a written policy for signing checks?						
	Reviewers:						
Sele	ct a sampling of outstanding checks for this section. A bank statements and corresponding						
37	Do checks require two (2) signatures as required by County Administrative Order 3-15, Uniform Standards for Evaluation and Performance of Community Based Organizations?						
38	If a facsimile signature, such as a stamp, is used, is there written policy safeguarding from fraudulent use of check signatures that specifies who has access to the signature.						
39	Are checks marked "Void after" a time period no greater than one (1) year"? [Indicate period of time printed on the checks.] [NOTE: Any check not cleared within the year requires an explanation from the subrecipient's Chief Financial Officer.]						
	•						
	For Health Insurance Assistanc	e Servi	ices Or	าเง			
40	Is there a written procedure for addressing insurance payments that were made on behalf of clients enrolled in Part A health insurance assistance program where the related check payments to the carriers or medical providers have been outstanding more than 60 days?						
	[If YES, request a copy of the procedure]						
	PETTY CASH OR PURCHASING	CARD	(P-CAF	RD)			
43	Does the subrecipient use a petty cash fund or P-card process for any program expenses even those expenses not funded by the Ryan White Part A/MAI Program? [If YES, complete #44 through #49 below. If NO, skip to "Procurement, Payments, and Accounts Payable.]						
44	Does the subrecipient have a written Petty Cash or P-card process Policy available for review? If the policy is general for the entire organization, Reviewers must test the petty cash process and fund						

	balance or the P-card process.		
	If the policy specifically excludes the Ryan White Program, make a related notation, mark this item "N/A" and skip to next section.		
45	Does the subrecipient's written policy include a policy on regularly balancing the petty cash fund or reviewing P-card purchases?		
	[If YES, how often and by whom?]		
46	Does the subrecipient's written policy limit the use of petty cash funds or P-card expenses for small purchases only?		
	[If YES, what is the threshold for petty cash or P-card purchases?]		
47	Do petty cash or P-card purchase records only show purchases under the established threshold?		
48	How is the petty cash fund replenished?		
49	Are the petty cash funds or P-card securely stored under lock and key?		
	[If YES how, where, by whom, and how many people have access to it?]		

	PROCUREMENT, PURCHASING	, AND	ACCO	UNTS	PAYABLE
50	Does the subrecipient have written Purchasing/Procurement Policy and Procedures that address:				
	 A code of conduct and other policies regarding acceptable practice, conflicts-of-interest, or expected standards of ethical and moral behavior for making procurements. 				
	 Purchase Order System used for most if not all purchasing 				
	c. All procurement decisions must include some form of cost analysis (review and evaluation of each element of cost to determine reasonableness, allocability, and allowability) and/or price analysis (comparison of price quotations submitted, market prices and similar criteria) to determine the most economical approach.				
	d. Avoidance of real or apparent organizational conflicts of interests and non-competitive practices among contractors with procurement				
	e. Procedure exists to avoid unnecessary or duplicative purchases				
	f. That no employee, officer, or agent of the subrecipient participate in the selection award and administration of contracts supported by federal funds where the possibility of a conflict of interest is real or apparent.				
	g. States that no officers, employees, may solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors or parties to any subagreement.				
	h. Procurement in excess of \$5,000 should have documentation sufficient to detail the history of the procurement to include method of procurement, selection of contract type, contractor selection or rejection, and basis for the contract price.				
	i. Maintenance of records sufficient to detail the history of a procurement which include at a				

	minimum, rationale for the method of procurement, selection of procurement vehicle (sole source, competitive bid, competitive proposal, noncompetitive proposal), method of contractor selection or rejection, and the basis for the price?			
	i. Standards of Conduct covering conflicts of interests in the selection, award and administration of contracts that include disciplinary actions to be applied for violations by officers, employees, and agents of the subrecipient?			
	j. Use of Federal excess and surplus property in lieu of purchasing new whenever such use is feasible and reduces project costs?			
	k. Description of and criteria for Procurement: 1) Micropurchases, 2) small purchases, and 3) purchases above the Simplified Acquisition Threshold including documentation required for each procurement type?			
	m. Equitable distribution of purchasing amongst qualified suppliers that offer a similar price?			
	n. Training in federal procurement requirements for key staff involved in procurement?			
	p. Limited use of Time and Material contracts?			
51	Are payments to vendors generated by an original invoice?			
52	If YES to #51 directly above, are the original invoices detailed (e.g., date, quantity, price, description of goods, etc.)			
53	Is payment to a vendor approved by authorized staff/management?			
54	Are invoices effectively cancelled to avoid duplicate payments (i.e., marked "Paid")?			
55	Do check and invoice amounts agree?			
56	Are canceled checks (facsimiles or copies) available as per the check register to support the amount paid?			
57	If NO to #56 directly above, is there an explanation of the variance?			
58	Do the dates on the checks match the "paid" dates on the invoices?			
59	Does the subrecipient have a process in place to	П	П	

	ensure that it is not paying sales taxes unnecessarily (applies to tax-exempt agencies only)?				
60	If NO to #59 directly above, is subrecipient filing for sales tax refunds from the State Department of Revenue? (applies to tax-exempt agencies only)?				
	IMPOSITION OF CHARGES AN	ND PRO	OGRA	M INCO	OME
61	Does the subrecipient provide Local Pharmaceutical Assistance Services (LPAP) as a 340B covered entity? [If NO, skip to #64 of this section.]				
62	If YES to #61 directly above in this section, did the subrecipient impose and collect any client charges (e.g., copayments, etc.; NOT 340B drug rebates) related to 340B-priced medications? [NOTE: Per HRSA Policy Clarification Notice #15-04, only ADAPs are eligible for 340B rebates.]				
63	Does the subrecipient track client charges for services other than LPAP? [If YES, specify which service categories.]				
64	Does the subrecipient have a sliding fee scale? [If YES, request a copy.]				
65	Does the subrecipient have established policies and procedures for handling program income generated by services rendered in the Ryan White Program. [If YES, have subrecipient staff show the OMB-GC monitoring staff this process of handling program income-related revenues.]				
66	Was there proof of a system in place to show initial billing or imposition of client charges, then receipt of such payment or collection of other funding, documentation of any client's inability to pay the imposed charges, and then reporting out of program income?				
67	Did the subrecipient report program income in the local Ryan White Program's Final Line Item Expenditure Report (FLIER) for the previous year?				
68	If YES, did the amount of program income reported in the FLIER match the amount identified in the subrecipient's program income tracking system?				
69	Was subrecipient able to show how this revenue (e.g., program income) is used to further the objectives of its Ryan White Program-funded services and cover program-related costs?				
70	If YES to #69 directly above, describe how the program income was used:				

71	In the case of individuals with income between 100% and 400% of the Federal Poverty Level (FPL), does the subrecipient ensure that client payments do not exceed the chargeable percentage of annual income set forth in Ryan White Treatment Extension Act of 2009 (Public Service Act (42 U.S.C. 201, 300ff(e))?			
72	Has a client ever reached their payment cap?			
73	If YES to #72 directly above, is there documentation that payments are no longer imposed on or charged to the clients who have reached the payment cap?			
	Does the subrecipient collect program revenues (program income) by from clients with HIV/AIDS diagnoses, such as:			
	 a. Third party charges and collections (Medicaid, Medicare, and private insurance)? 			
74	 b. Client fees based on the subrecipient's sliding fee scale 			
	 c. Charges or collections for practitioners whose salaries are paid in whole or in part with Ryan White Program funds? 			
	d. Interest payments			
75	If YES to #74 above, does the subrecipient have a specific account designated to record/track Ryan White Program Income? [If YES, specify which account.]			
76	If YES to #75 directly above, is program revenue recorded in the accounting system by program or activity that generated it?			
77	If YES to #76 above, are the program revenues deposited in the account where Ryan White Program funds are deposited?			
78	Does the agency prepare and review reports on program income? [If YES, request a copy of the program income reports]			
79	Do fiscal policies specify how program income is tracked by the activity that generated it?			
80	Are the revenues used for related program services and do fiscal policies specify how the program income is to be used?			
For	this section reviewers will test operational and add and percent	minist		ses for accuracy of total amounts
81	Does the subrecipient maintain an agency-wide budget by funding source and expenditure category (i.e., cost allocation plan for all funding received showing all expenditure line items)? [If YES, request a copy]			

82	If YES to #82 directly above, do the program budgets tie to the figures in the agency-wide budget?			
83	Do documented expenditures follow the most current budget approved by the Ryan White Program?			
	Does the subrecipient regularly track expenditures versus budgeted amounts and reconcile (compare and adjust) budgeted and invoiced amounts to actual expenditures and conduct a comparison to service utilization cost versus reimbursement?			
84	a. What staff position(s) does this identify using position title?			
	 b. How often is this done? [NOTE: as a best practice, the ideal frequency would be quarterly] 			
	c. How is the information used?			
85	Does the subrecipient have a process to address situations where actual expenditures are well below or above budgeted amounts? [Reviewer: this should include regular review of budgeted vs. actual, internal budget revisions, etc., then ultimately a repayment to the funding when applicable]			
	AU	IDIT		
86	Does the subrecipient expend over \$750,000 in all federal funds inclusive of Ryan White funds and therefore is required to conduct an annual Single Audit? Date of most current audit? [If YES, proceed to #88]			
	[If NO, proceed to #87]			
87	Does the subrecipient have audited financial statements or conduct an annual audit anyway?			
	[If YES, proceed to #88]			
88	Does the subrecipient have a written policy regarding the selection of an independent auditor?			
89	Does the subrecipient have a copy of the auditor's peer review?			
00	Is the subrecipient required to have a Single Audit?]		
90	[Specify FY End date and date of most current audit.]			

91	Did the independent auditor find the subrecipient to have a sound and stable financial status (i.e., no significant findings, material weaknesses, reportable conditions, or lack of internal controls)?				
92	Did the independent audit report (Schedule of Federal Awards) properly identify prior year Ryan White Program funding, if applicable? (NOTE: Ryan White Part A and related MAI funding is listed as CFDA 93.914)				
93	Has subrecipient tested the Ryan White Program as a major program in the last two years? [If YES, request a copy of the page that shows the Ryan White Program was tested as a major program]				
94	If YES to #93 above, were there any findings?				
95	Did the subrecipient submit the audit within 9 months of the subrecipient's Fiscal Year End date or within 30 days of the completion of the audit report, whichever comes first, to the Audit Clearinghouse and OMB?				
96	Is there documentation that the subrecipient's Finance or Audit Committee and/or Board of Directors received all audit reports and took action towards the correction of any deficiencies noted? [Request a copy of meeting minutes and plan to cure deficiencies]				
	SECTION XIII: REVIEW O			PIENT'	'S
payı	eview of the subrecipient's payroll records is condi- roll costs is maintained and to confirm that these ag- recipient's Ryan White Program and/or Minority AIDS I	gree w	ith co	sts app	proved by the County under the
	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	Are staff members' work hours documented through a time sheet, electronic time clock, or sign in/out log? [If yes, specify.]				
2	Are time records signed by both the employee and the supervisor?				
3	Do payroll journals include staff name, gross/net pay amounts or salary, hours worked, payroll period, and payroll deductions?				
4	Does the subrecipient maintain time distribution records and/or Time and Effort reports for all employees whose salary is paid in whole or in part with				

federal funds or is used to meet a match or cost-share

	(%) (%)	irement of a grant that indicate or amount of time dedicated and or amount of time charged to rams or funding sources?	the percentage					
5	shee	payroll expenses/reporting be tracts to time and effort reports, to pact statements?						
6	prac	s the subrecipient use reports of titioners to assess reasonablene t charged to Ryan White Program	ess of time and					
		E	mployee Reco	rds Rev	view			
Sample employee records and confirm that positions, salar approved by the County. Monitoring staff must be able to tra time and effort reports, to the payroll register, to bank statements					yroll (expenses		
		Faylon F	Register Reviev	v a rec	Onch	iauon		
Ry Wh Prog Serv Cate	nite gram vice	Employee Name and Title	Gross Amount Recorded on Payroll Register for Month(s) Sampled	Annua Amo (Estima	unt	Amoun Projecte on Budg	ed Amount	Comments/ Findings/ Observations
		Name:	Сатро					
		Name: Title:	-					
	,	Title:						
		Title: Salary						
		Title: Salary Fringe						
		Title: Salary Fringe Name:						
		Title: Salary Fringe Name: Title:						
		Title: Salary Fringe Name: Title: Salary						
		Title: Salary Fringe Name: Title: Salary Fringe						
		Title: Salary Fringe Name: Title: Salary Fringe Name:						

Name: Title:

Salary Fringe

Name:			
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Salary			
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	Time and	d Effort Review & Reconciliation								
Ryan White Program Service Category	Employee Name and Title	Employee % Projected on budget for fiscal year reviewed for mosamp			Variance between % reconciled and % in report for month sampled	Comments/ Findings/ Observations				
	Name:		_							
	Title:									
	Percentage									
	Name:									
	Title:									
	Percentage									
	Name:									
	Title:		_							
	Percentage									
	Name:									
	Title:		_							
	Percentage									
	Name:									
	Title:									
	Percentage									
	Name:									

Title:			
Percentage			

SECTION XIV: REVIEW OF SUBRECIPIENT'S PAYROLL TAX RECORDS AND PAYMENT OF FRINGE BENEFITS

A review of the subrecipient's payroll tax records is conducted to ensure that the subrecipient is calculating and remitting all payroll taxes, including unemployment compensation, to the appropriate authorities in a timely manner.

	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	Are withholding, FICA and MICA (e.g., social security and Medicare) taxes deposited in a timely manner and in accordance with payroll register data? (payment of taxes must be documented in bank statements)				
	[Indicate time period reviewed] Is the quarterly IRS Form #941 (Employer's				
	QUARTERLY Federal Tax Return) properly completed, submitted/filed, and paid on time (payment must be documented in bank statements)?				
2	(NOTE: due last day of month following end of calendar quarter. For example, Quarter 1 ends March 31, form due April 30; Quarter 2 ends June 30, form due July 31; Quarter 3 ends September 30, form due October 31; and Quarter 4 ends December 31, form due January 31.)				
3	Is the yearly IRS Form #990 (Return of Organization Exempt from Income Tax) and Schedule A [Organization Exempt Under Section 501(c)3 Supplementary Information] submitted/filed on time? (Due 15 days after the 5 th month after the subrecipient's fiscal year end; automatic 3-month extension available through Form 8868)				
	Is the quarterly RT-6 for State unemployment submitted/filed by the due date and was the tax liability paid on time? (must be documented in bank statements)				
4	(NOTE: due last day of month following end of calendar quarter. For example, Quarter 1 ends March 31, form due April 30; Quarter 2 ends June 30, form due July 31; Quarter 3 ends September 30, form due October 31; and Quarter 4 ends December 31, form due January 31.)				

	(See quarterly form RT-6 for State unemployment and annual form 940 for Federal unemployment)					
5	Has the subrecipient had no penalties or interest payments charged due to late tax or insurance payments?					
6	Are IRS W-2 Forms (Report of Wage Statement to employees) distributed to current and prior employees by the January 31st deadline?					
7	Does the subrecipient keep a copy of W-2s?					
8	If the subrecipient has subcontractors under this Agreement, were the IRS 1099 forms (report of amounts paid to <u>independent contractors</u>) distributed to all subcontracted parties by the February 16th deadline?					
9	Is the Social Security transmittal filing (W-3) by the due date, by mail February 28/29th, or e-filing by March 31st, of each year?					
	PAYMENT OF FF	RINGI	E BEN	IEFITS	6	
10	Are payments to the health insurance provider made in a timely manner?					
11	Are payments to the life insurance company made in a timely manner?					
12	If the subrecipient offers a retirement plan (e.g., 401K Plan), are employee contributions and employer match deposited/submitted in a timely manner?					
13	If the subrecipient has more than 20 employees and is subject to COBRA insurance continuation policies, has the subrecipient established appropriate policies and procedures for notifying employees at termination that they are eligible for such benefits? (See subrecipient's personnel policies for COBRA.)					
	,			11	I	
	SECTION XV: REVIEW PROTECTION				ENT'S	
	view of the subrecipient's policies and procedures peducted to ensure that the subrecipient is complying v					
	Area of Evaluation	,	Yes	No	N/A	Comments/Findings/ Observations
	Does the subrecipient have a written Recor	rd				
1	 Specifies the subrecipient's obligation maintain and store documentation as require by Florida Statue and HHS Grants Poli 					
	Miami-Dade County Office of Management and E	Budae	et-Gra	nts Co	ordinat	ion Page 31 of 39

		Area of Evaluation	Yes	No	N/A		Comments/Findings/ Observations
(fixe	d asse	f the subrecipient's policies and procedures per ets) purchased with Ryan White Program fur with federal, state, and local regulations.					
	SECTION XVI: REVIEW OF SUBRECIPIENT'S PROTECTION OF PROPERTY						
		S, how often are the records backed-up and e are back-ups kept?]					
4							
		omputer-based records and documents backed to a medium that is stored in a fire-resistant					
	and w	ES, where are hard copy client files located who has access to them?]	l				
3		lock and key?					
	If YES	6 to #2 directly above, are the hard copy files kept			. L		
2	Does	counsel? the subrecipient maintain hard copy files?] [7	
	i.	Requires tracking requests for review of clien records from authorized persons or lega] [
	h.	Addresses access to hard copy or electronic records by Federal, State, and County granted staff as required in funding contracts?] [
	g.	Requires that computer-based records and documents are password protected?	d				
	f.	Has protocols to maintain and protect computer based documents and records?					
	e.	Restricts access to client records only to authorized staff?	0				
	d.	Requires that hard copy files are kept under loc and key?	k] [
	C.	States the subrecipient's HIPAA policy for the protection of identifiable health information and specifies that client must receive a copy of policiat intake?	$d _{\;\; \sqcap}$				
	b.	Addresses how subrecipient will safeguard clien confidentiality, including requiring employees to sign a confidentiality statement at time of hiring.	o 🗆				
		Statement?					

1	Has the subrecipient purchased non-expendable personal property or exempt property valued at \$1,000 or greater with Ryan White Part A funds? [If NO, skip to Section XVIII] [If YES, proceed to #2]		
	Is there a Property Management Policy that addresses:		
	 a. Criteria for records of fixed assets purchased with the Ryan White Program funding 		
	b. Acquisition date		
2	c. Disposal date and method [If YES, specify]		
	d. Funding Source		
	e. Use/Condition		
	f. Location		
	Does the fixed asset register (inventory log) include the following information:		
	a. Item description		
	b. Acquisition date		
	c. Cost		
3	d. Titleholder		
	e. Percentage of Federal participation		
	f. Disposal date and method [If YES, specify]		
	g. Funding Source		
	h. Use/Condition		
	i. Location		
	j. Serial or other ID number		
	k. Asset tag number		
	I. FAIN Number		
4	Is a physical inventory taken and recorded on an annual or biennial basis?		
5	Are property records reconciled to the General Ledger at least once annually?		
6	Are fixed assets being used in accordance with funding intent?		

7	Does the subrecipient have a maintenance procedure in place to keep property in good condition?				
8	Has full payment been made for fixed assets paid for by the Ryan White Program, and are assets free from liens?				
9	Does the subrecipient have adequate controls to safeguard against or prevent loss, damage, theft?				
10	Has the subrecipient obtained prior approval from the County to dispose of any fixed asset purchased with Ryan White Program funds (assets with dollar value greater than or equal to \$1,000)?				
11	Were fixed assets purchased within the contract period in which they were approved/funded?				
12	Were fixed assets funded by the Ryan White Program purchased through competitive procurement (at least 3 written bids)?				
13	Were the assets disposed of following the requirements in the environmental regulations? (Certificate of Disposal)				
	SECTION XVII: REVIEW OF SUBRI RELATED TO THE PROVISION OF RYAN V				
sub sub		is co ogram	PROG nducte require	RAM-F d to e ements	ensure that work performed by . This review also ensures that
sub sub	RELATED TO THE PROVISION OF RYAN Veriew of the subrecipient's subcontracting policies contractors is in compliance with Ryan White Provecipient payments to subcontractors are properly documents.	is co ogram	PROG nducte require	RAM-F d to e ements	ensure that work performed by . This review also ensures that
sub sub	RELATED TO THE PROVISION OF RYAN Veriew of the subrecipient's subcontracting policies contractors is in compliance with Ryan White Provecipient payments to subcontractors are properly document from the County.	is co ogram umente	PROG nducte require d and s	RAM-F d to e ements support	ensure that work performed by This review also ensures that ted by executed subcontracts with Comments/Findings/
subr subr cons	RELATED TO THE PROVISION OF RYAN Veriew of the subrecipient's subcontracting policies contractors is in compliance with Ryan White Provecipient payments to subcontractors are properly doctors and the County. Area of Evaluation Did the subrecipient subcontract any of its Ryan White Program-funded services? [If NO, skip to	is considerate is considerate is considerate is considerate is considerate in the considerate in the	nducte require d and s	RAM-F ed to e ements support	ensure that work performed by This review also ensures that ted by executed subcontracts with Comments/Findings/
subo subi cons	RELATED TO THE PROVISION OF RYAN V eview of the subrecipient's subcontracting policies contractors is in compliance with Ryan White Pro- recipient payments to subcontractors are properly doct- sent from the County. Area of Evaluation Did the subrecipient subcontract any of its Ryan White Program-funded services? [If NO, skip to Section XVII] Was the subcontract(s) submitted to the County for consent prior to implementation of services by the	is configuration of the config	nducte require d and s	RAM-F ed to e ements support	ensure that work performed by This review also ensures that ted by executed subcontracts with Comments/Findings/
subo subo cons	RELATED TO THE PROVISION OF RYAN V eview of the subrecipient's subcontracting policies contractors is in compliance with Ryan White Pro- recipient payments to subcontractors are properly doct- sent from the County. Area of Evaluation Did the subrecipient subcontract any of its Ryan White Program-funded services? [If NO, skip to Section XVII] Was the subcontract(s) submitted to the County for consent prior to implementation of services by the subcontractor? Does the subrecipient maintain documentation to	is configuration of the second	nducte required and s	RAM-F d to e ements support N/A	ensure that work performed by This review also ensures that ted by executed subcontracts with Comments/Findings/

	a.	Term of the agreement with annual renewal requirement		
	b.	Language that requires the subcontractor to comply with the terms and conditions of the prime contract (subrecipient's Ryan White Part A/MAI contract with Miami Dade County) including, but not limited to, applicable policies, procedures, and requirements of the Ryan White Program		
	C.	Scope of work detailing services to be performed		
	d.	Language regarding client confidentiality and HIPAA regulations, if applicable.		
	e.	Requirements regarding the maintenance and retention of records		
	f.	Assurances that the subcontract is not an employee of the subrecipient or Miami Dade County		
	g.	Language pertaining to the payment structure (i.e. hours of service, rate of pay per hour or per service unit, and method of payment)		
	h.	Language to allow the suspension of the subcontract before its expiration, what is the cause of the suspension is and what remedies the subcontractor may take remove suspension and/or avoid termination		
	i.	Language to allow the termination of the subcontract before its expiration due to lack of performance, noncompliance with term and conditions, or lack of funding etc.		
	j.	Clause permitting Miami-Dade County to relinquish the subcontractor of its obligations under the subcontract due to breach of contract; and in the event the County finds the subrecipient in breach of contract, the option of the County to pay the subcontractor directly for the performance of such subcontract. Additionally clause must assert that the foregoing shall neither convey nor imply any obligation or liability on the part of the County to any subcontractor		
6	carry	the subrecipient require that subcontractors liability insurance and monitor maintenance of rage during the entire term of the agreement?		

7	Can the subrecipient show evidence of monitoring its subcontractors for compliance with programmatic, documentation, and billing requirements?				
8	Does the subrecipient pay subcontractors within 30 to 45 days of receipt of a complete and accurate invoice)?				
	SECTION XVIII: REVIEW O				NT'S
	view of the subrecipient's licenses and accreditations is one local Ryan White Program and complies with local, sta	condu	cted t	o ens	
	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	If the service(s) offered require special operational licenses, are they current and appropriate?				
2	Is the agency a Federally Qualified Health Center?				
3	Is the agency currently accredited by the Joint Commission (formerly known as the Joint Commission on Accreditation of Healthcare Organizations (JCAHO)]?				
	SECTION XIX: REVIEW O INSURANCE CO			IPIEN	T'S
expo Artic age		over/ cted to cal, st eemer entract	AGE to enstate, a ate, a at for s are	sure tand fe Ryan exen	hat the subrecipient is free of risk deral statutes. (NOTE: Pursuant to White Program- funded services, npt from the insurance requirement.
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	Worker's Compensation				
	Expiration Date:				
	Coverage Amount:				
	Automobile Liability				
	Expiration Date:				
	Coverage Amount:				
	FQHCs or	nly			
	Federal Tort Claims Act (FTCA) Deeming Notification Letter				
2	Expiration Date:				
	Coverage Amount:				
	SECTION XX: REVIEW OF COMPLIANCE WITH PROGRAM RE				
	eview of the subrecipient's report submissions is conductive requirements and the due dates.				
	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	Was the subrecipient's most recent Annual Progress Report submitted by the deadline established by the County?				
2	Has the subrecipient submitted all required assurances for appropriate use of Ryan White Program funds, signed annually, with the Annual Progress Report?				
3	Was the subrecipient's most recent Final Line Item Expenditures Report (FLIER) submitted by the deadline established by the County?				
4	Does the subrecipient have the capacity to manage and report required administrative and clinical data for the				
	RSR?				
5					

7	Was the most recent Corrective Action Plan submitted in a timely manner?		
8	Has the subrecipient had all cures to finding in their most recent Corrective Action Plan approved by OMB staff?		
9	Are reimbursement requests consistently submitted on time (by the 20 th day of the month following the month in which services were provided), unless specifically granted an extension in writing from OMB-GC/RW management?		

SECTION XXI: REVIEW OF SUBRECIPIENT'S QUALITY IMPROVEMENT PROGRAM AND COMPLIANCE WITH RYAN WHITE CLINICAL QUALITY MANAGEMENT PROGRAM

This review is related to the subrecipient's incorporation of internal quality management best practices and/or compliance with internal and Ryan White Program-related continuous quality improvement reviews conducted by Behavioral Science Research Corporation (BSR) and/or the local AIDS Education and Training Center (AETC). [Review should focus on subrecipients funded for Outpatient/Ambulatory Health Services, Oral Health Care, and Mental Health Services.]

	Area of Evaluation	Yes	No	N/A	Comments/Findings/ Observations
1	Does the subrecipient have a Quality Management Program? [If YES, request a copy and indicate when it was last updated]				
2	Are staff and clinicians involved in the Clinical Quality Management (CQM) program, including key (senior) staff?				
3	Are CQM meetings held on a consistent basis with documentation of the meetings and activities?				
4	Are CQM activities, including data collection, utilized in strategic planning, modifying policies and procedures, and development of ongoing work plans?				
5	Are CQM results reported to HIV program staff, consumers, and governing bodies (as applicable)?				
6	Are quality goals measurable and reasonable?				
7	Is there a tracking mechanism for outcomes and process improvements?				
8	Are the tracked performance measures based on clinical guidelines or other relevant processes that contribute to improved clinical care, including oral health care?				

9	Is there a tracking mechanism in place that is monitored closely to identify clients who miss medical appointments or have not had a visit for longer than six months?						
10	Did the subrecipient receive an external quality management review or follow-up review by BSR and/or the local AIDS Education and Training Center (AETC) during this monitoring period?						
	If YES to #10 directly above, indicate the service category reviewed, scoring threshold, and subrecipient's overall score.	9	Established Scoring Threshold (%)		Subrecipient's Overall Score	Find	dings?
11	Service Category: Date of Record Review:						Yes No
	Service Category: Date of Record Review:						Yes No
	Service Category: Date of Record Review:						Yes No

Miami-Dade County Office of Management and Budget-Grants Coordination Ryan White Program – Comprehensive Monitoring Instrument SECTION V: REVIEW OF SUBRECIPIENT'S BILLING PRACTICES

Billing Audit (Client Chart Review)

(Verification of Documentation of Service Units Billed to Ryan White Program -List services that lack documentation or have variances only)

Service Category:

CIS#	Date of Service	Type of Service, Billing Code, & # of Units Reviewed	Variance (indicate # of units and dollar value)	Comment / Finding

Duplicate page as necessary

Appendix B

Miami-Dade County Office of Management and Budget-Grants Coordination Ryan White Program – Comprehensive Monitoring Instrument

SECTION VI: REVIEW OF DOCUMENTATION OF CLIENT ELIGIBILITY FOR RYAN WHITE PART A/MAI PROGRAM-FUNDED SERVICES

CLIENT ELIGIBILITY REVIEW WORKBOOK

(**NOTE**: Reviewers must complete a <u>separate</u> Client Eligibility Review Workbook for <u>each</u> client in review sample.

All sections should be completed as applicable to each client.)

SECTION 1 – Client a	nd Household Information
Subrecipient Assigned Client ID#:	CIS #:
Gross Household Income:	Household Size:
Client's Medicaid # (if applicable):	Client's ADAP # (if available):
SUBSECTION 1A - En	rollments and Certifications
Client's Original Enrollment Date in Ryan White Program (if available):	(Medical) Case Management Agency:
Name of (Medical) Case Manager:	RW Medical Case Manager? ☐ Yes ☐ No
Date of last eligibility assessment: MCM Agency completing eligibility assessment:	Were the client's re-assessments consistently completed? (Every 6 months through November 1, 2022, every 366 days thereafter)
	☐ Yes ☐ No
Was the client referred by an agency outside of Miami-Dade County Part A/MAI using NOE?	Is NOE included in client's record? (Beginning June 1, 2023)
□ Yes □ No	Yes
If yes, which agency?	No, eligibility documentation updated (complete Section 2 for review of updated documentation)
If yes, was proof of Miami-Dade County residency included?	documentation
□ Yes □ No	
For assessments conducted 366 days after first 6 November 1, 2023:	eligibility certification period that occurred after
Self-Attestation Form included in client's record? Yes	
□ No (complete Section 2 for review of updated	d documentation)

Miami-Dade County Office of Management and Budget-Grants Coordination
Ryan White Program – Comprehensive Monitoring Instrument
SECTION VI: REVIEW OF DOCUMENTATION OF CLIENT ELIGIBILITY

FOR RYAN WHITE PART A/MAI PROGRAM-FUNDED SERVICES

SECTION 2 – Minimum Eligibility and Payer of Last Resort							
	Eligibility Requirement	Yes	No	N/A	Comments		
1	Verification of HIV+ Status located in the client record						
2	Verification of Miami-Dade County Residency <u>located in the client record</u>						
3	Verification of Gross Household Income <u>located in the client record</u>						
4	Is there a picture ID of the client $\underline{\text{located in the client}}$ $\underline{\text{record}}$?						
5	Is the client employed? [If YES, check one] □ Full-time □ Part-time						
6	If YES to #5 directly above, is the client eligible for and enrolled in private health insurance? (NOTE: if client is working, check last 2 paystubs to identify if any health insurance deductions were made)?						
7	If YES to #6 directly above, did the subrecipient ensure that no services available to the client through private insurance reimbursement were charged to the Ryan White Program?						
8	Are other payer sources noted in the Financial Assessment?						
9	Medicaid Verification: Is there documentation from Florida Medicaid Management Information System (FMMIS) - Medifax or MEVSNET queries regarding the client's Medicaid eligibility showing that client status was inactive, ineligible, or not found? [NOTE: Medicaid verification printout has the hyperlink http://mymedicaid-florida.com/ at the bottom of the page indicating "Eligibility Verification Request" and "Recipient Information" (Subrecipients get this from AHCA website under "Secure Information for Subrecipients).						
10	Is there documentation from the Social Security Administration (SSA) of client's eligibility status annually (as appropriate), with a notation of "no change" at each annual reassessment (if applicable)?						

Miami-Dade County Office of Management and Budget-Grants Coordination Ryan White Program – Comprehensive Monitoring Instrument SECTION VI: REVIEW OF DOCUMENTATION OF CLIENT ELIGIBILITY

FOR RYAN WHITE PART A/MAI PROGRAM-FUNDED SERVICES

11	of client's ineligibility for other funding sources (e.g., benefit program denial letter from Medicaid, Medicare, Social Security, etc.)?				
12	Is other required documentation that is pertinent to each service category utilized by the client on file such as Letters of Medical Necessity, Ryan White In Network or Out of Network Referrals, etc.? (this varies for each service category)				
13	Was the client determined to be eligible for ACA? [If YES, proceed to #14; if NO, skip to Section 3]				
14	Is a signed Decline Affordable Care Act Marketplace Enrollment Acknowledgement / Certification located in the client record? If client did not sign up for insurance? [Answer YES if client declined and signed form is there, then skip to section labeled "Consents/Acknowledgments"; answer NO if client declined but no signed form.]				
15	Is a completed Miami-Dade County Affordable Care Act (ACA) Client Acknowledgment Form in the client record?				
16	Is there an appropriate referral to the contracted Ryan White Part A health insurance assistance service provider who will coordinate the ACA enrollment process and make appropriate payments on behalf of ACA-eligible/enrolled clients?				
	SECTION 2 Concents / Askn	ouloda	am o nte	-	
	SECTION 3 – Consents / Ackno Signed once, unless revoked			5	
	Area of Evaluation	Yes	No	N/A	Comments
1	Is there a current, complete, signed and dated Miami-Dade County Ryan White Program Integrated Consent (Combined Consent) form scanned into Provide Enterprise Miami form?				
1a	In the Combined Consent, is the Outreach Consent section signed and dated by both the medical case manager and the client?				
1b	If NO to #1a directly above, did the client receive outreach services after the date the Combined Consent was signed?				

Is there documentation in progress note for reassessment

Appendix B

Miami-Dade County Office of Management and Budget-Grants Coordination Ryan White Program – Comprehensive Monitoring Instrument SECTION VI: REVIEW OF DOCUMENTATION OF CLIENT ELIGIBILITY

FOR RYAN WHITE PART A/MAI PROGRAM-FUNDED SERVICES

2	Is there a signed and dated acknowledgement from the client noting receipt of the agency's Client Grievance Policy?						
		_					
SECTION 4 – Confirmation of Client's Medical Case Management Services (Complete this section only for clients enrolled in the local Ryan White Part A/MAI Program. See Section 1 of this monitoring instrument.)							
	Area of Evaluation	Yes	No	N/A	Comments		
1	Date of Last Comprehensive Health Assessment:						
2	Date of Last Financial Assessment:						
3	Dates of Last Two Plans of Care Entries:						
4	Is there a detailed progress note dated to coincide with the completion of the two most current comprehensive health assessments, financial assessments, and plans of care?						
E	Do the Plans of Care consistently include the medical case						

5

management supervisor's signature?

Miami-Dade County Office of Management and Budget-Grants Coordination Ryan White Program – Comprehensive Monitoring Instrument SECTION XI: REVIEW OF SUBRECIPIENT'S

PERSONNEL POLICIES AND PROCEDURES

	Perso	nnel Re	cord Rev	riew
Staff Person:				
Documentation Requirement	Documentation Found?			Comments/Findings/ Observations
	Yes	No	N/A	
Signed job application				
Proof of education (copies of degrees and/or transcripts)?				
Current licenses required for position, if applicable (nonexpired)				
Level II Background screening, if applicable?				
Job descriptions describing functions, duties, and performance standards adequate to the position(s) funded under the Ryan White Program?				
Annual performance/employee evaluation?				
Federal I-9 Form (Employment Eligibility Verification Form)?				
Federal W-4 Form (Employee's Withholding Allowance Certification; at least one on file)?				
Proof of completion of required hours of training?				
Proof of knowledge of the subrecipient's policies and procedures?				
Signed Confidentiality statement?				
Signed confirmation of receipt of 41 U.S.C. 4712 whistleblower rights and protections?				
Documentation that staff member is not on OIG and SAM.gov exclusion lists (annually)				

Duplicate table as necessary. One table per staff member file reviewed.