

RWP Section: ADMINISTRATIVE-Programmatic
 RWP Procedure Number: 1b.9
 Effective Date: 11/12/2025 (rev. 11/12/2025)

Client Grievance Policy and Procedures

REQUIRED LANGUAGE FOR CONTRACTS & SITE VISIT MONITORING TOOL

Note:

This appendix includes the required contract language and monitoring tool references related to **client grievance procedures** for services funded through the **Ryan White Program (Part A, MAI, and EHE)**. The goal is to ensure these requirements are applied **consistently** across all funded contracts.

Disclaimer:

The term “minority” in this document is used as defined by the federal **Minority AIDS Initiative (MAI)** to describe populations identified in federal program guidance. The term appears here only to maintain consistency with federal program requirements and terminology.

FOR PART A/MAI CONTRACTS:

Article II, Section 2.1 B, Article VI, Section 6.10 D, and Article VII, Sections 7.1 A (8) and C, of the corresponding Professional Services Agreement (contract) with Miami-Dade County for Ryan White Part A/MAI Program Services, as follows (bolded herein for emphasis only) and as may be amended:

Article II, Section 2.1B:

2.1 The SUBRECIPIENT, by and through its agents, assigned representatives and Subcontractors agrees:

- B. Where applicable throughout this Agreement and its corresponding exhibits, services designated as Part A services shall be provided to low-income, program-eligible people with HIV who reside in Miami-Dade County as further defined in Article VII, Section 7.1, Exhibit A, and Exhibit B of this Agreement. In addition to the before-mentioned residency requirement, services designated as MAI services shall only be provided to program-eligible minority people with HIV as further defined in Exhibits A and B of this Agreement. Part A services and expenditures must be tracked separately from MAI services and expenditures.

The goal of MAI-funded activities is to reduce differences in health outcomes and achieve viral load suppression for clients who self-identify as a member of a HRSA-defined heritage group. MAI-funded subrecipients will provide services under this Agreement to improve HIV-related health outcomes for minority communities disproportionately impacted by HIV in Miami-Dade County, such as people with HIV who are from Black/African American, Haitian, Spanish, or Latin American heritage communities. MAI strategies will improve health outcomes by addressing the needs, geographic impact, or social and economic conditions of these minority communities. MAI funds must be tracked and reported separately.

Article VI, Section 6.10:

6.10 The SUBRECIPIENT shall:

- E. Establish internal grievance procedures that address complaints by client, staff, or other service providers, as well as support implementation of the COUNTY Ryan White Program's Client Grievance Policy and Procedures, as may be amended, including the following steps:
 - (1) Inform clients at initial enrollment, during annual recertification encounters, and at initial service visit about the availability of the policy and related procedures, and how to notify SUBRECIPIENT of an informal complaint or file a formal grievance.
 - (2) Post the Ryan White Program's Client Grievance Policy and Procedures in a prominent, easily noticeable location. A COUNTY-approved flyer will suffice for providing awareness to clients on how to access details of these Client Grievance Policy and Procedures.
 - (3) Address all informal complaints or formal grievances identified by clients, staff, or other care providers promptly. Coordinate with the COUNTY to address concerns that are escalated to them.
 - (4) Track and report documentation of informal complaints and formal grievances from clients, program staff, or other care providers to the COUNTY in the Annual Progress Report, as referenced in Article VII, Section 7.1 (C) of this Agreement, or upon request during the annual comprehensive site visit monitoring process.

Article VII, Section 7.1:

7.1 The SUBRECIPIENT shall keep adequate, legible records of services provided under this Agreement as required by the COUNTY and by the U.S. Department of Health and Human Services...

- A. At a minimum, the following records shall be kept, and uploaded in the Provide® Enterprise Miami data management system under the appropriate placeholder under the View\Scanned Documents link:
 - (8) In accordance with HRSA Policy Notice No. 16-01 (<https://ryanwhite.hrsa.gov/grants/policy-notice>), Ryan White HIV/AIDS Program recipients and subrecipients may not deny services, including prescription drugs, to a veteran who is eligible to receive Ryan White HIV/AIDS Program services. Ryan White HIV/AIDS Program recipients and subrecipients may not cite "payer of last resort" language to compel HIV-infected veterans to obtain services from the Veterans Administration health care system or refuse to provide services. Ryan White HIV/AIDS Program recipients and subrecipients may refer eligible veterans to the Veterans Administration for services, when appropriate and available. However, Ryan White HIV/AIDS recipients and subrecipients may not require eligible veterans to access medical or supportive services in the

Veterans Administration health care system nor deny them access to health care and support services funded by the Ryan White HIV/AIDS Program. In addition, this payer of last resort requirement does not apply to clients who are eligible for services covered by Indian Health Services; such clients may choose to access the Ryan White Program first.

- C. Based on client-level and service utilization data entered in the Provide® Enterprise Miami data management system, the SUBRECIPIENT shall submit an Annual Progress Report, a qualitative report based on fiscal year billing and service provision data, to the COUNTY on a form to be provided by the COUNTY, at a date to be determined by the COUNTY, within sixty (60) calendar days after the end of the contract period, unless an extension is granted by the COUNTY. Unless otherwise reduced by the COUNTY in writing, this reporting requirement will include a narrative of accomplishments, challenges, and technical assistance needs encountered during the fiscal year; as well as a reporting of progress made in relation to the National CLAS Standards, the Ryan White Program System-wide Standards of Care, the Medical Case Management Standards of Service, and Affordable Care Act enrollment and tax reconciliation, where applicable, as defined in the most current, local Ryan White Program Service Delivery Manual, incorporated herein by reference, as may be amended. A reporting of informal complaints and/or formal grievances received and responded to by the SUBRECIPIENT may also be included as part of the Annual Progress Report. As a component of this report, if the data are not readily available in the Provide® Enterprise data management system, the SUBRECIPIENT may also be required to collect and report to the COUNTY, in a format to be provided by the COUNTY, information on specific client-level outcome measures as established by the COUNTY and the Miami-Dade HIV/AIDS Partnership, and included herewith in Exhibit A as part of the Scope of Service(s).

The SUBRECIPIENT will also submit annually a signed assurance to accompany the Annual Progress Report, in a format provided by the COUNTY for this reporting requirement. This assurance form shall be initialed and appropriately signed by the SUBRECIPIENT's Board President and its Chief Executive Officer, and properly notarized or stamped with a corporate seal. This assurance will indicate that Ryan White Program grant funds were used in accordance with the Uniform Guidance, HRSA policies, and the most current, local Ryan White Program Service Delivery Manual, incorporated herein by reference, and do not include unallowable costs as detailed in Article VI, Section 6.9, of this Agreement.

The MAI-funded SUBRECIPIENT shall enter all client-level and service utilization data in the Provide® Enterprise Miami data management system for eligible minority people with HIV (minority clients) to assist with the reporting of the Annual Progress Report for MAI-funded services.

The COUNTY will be responsible for preparing a summary report to submit to HRSA, based on the client and service data entered in the Provide® Enterprise Miami data management system. This COUNTY generated report will include information on client demographics, service utilization, and specific client-level outcome measures as established by the COUNTY and the Miami-Dade HIV/AIDS Partnership, and included herewith in Exhibit A as part of the Scope of Service(s).

FOR EHE CONTRACTS:

Article II, Section 2.1 B, Article VI, Section 6.10 D, and Article VII, Sections 7.1 A (8) and C, of the corresponding Professional Services Agreement (contract) with Miami-Dade County for Ryan White EHE Program Services, as follows (bolded herein for emphasis only) and as may be amended:

2.1 The SUBRECIPIENT, by and through its agents, assigned representatives and Subcontractors agrees:

- B. Where applicable throughout this Agreement and its corresponding exhibits, services designated as EHE services shall be provided to program-eligible people with HIV [with priority to those] who reside in Miami-Dade County as further defined in Article VII, Section 7.1, Exhibit A, and Exhibit B of this Agreement.

The goal of EHE-funded activities in this Agreement is to treat people with HIV rapidly and effectively to reach sustained viral suppression.

Article VI, Section 6.10:

6.10 The SUBRECIPIENT shall:

- E. Establish internal grievance procedures that address complaints by client, staff, or other service providers, as well as support implementation of the COUNTY Ryan White Program's Client Grievance Policy and Procedures, as may be amended, including the following steps:
 - (1) Inform clients at initial enrollment, during annual recertification encounters, and at initial service visit about the availability of the policy and related procedures, and how to notify SUBRECIPIENT of an informal complaint or file a formal grievance.
 - (2) Post the Ryan White Program's Client Grievance Policy and Procedures in a prominent, easily noticeable location. A COUNTY-approved flyer will suffice for providing awareness to clients on how to access details of these Client Grievance Policy and Procedures.
 - (3) Address all informal complaints or formal grievances identified by clients, staff, or other care providers promptly. Coordinate with the COUNTY to address concerns that are escalated to them.
 - (4) Track and report documentation of informal complaints and formal grievances from clients, program staff, or other care providers to the COUNTY in the Annual Progress Report, as referenced in Article VII, Section 7.1 (C) of this Agreement, or upon request during the annual comprehensive site visit monitoring process.

Article VII, Section 7.1 A (8) and C:

The SUBRECIPIENT shall keep adequate, legible records of services provided under this Agreement as required by the COUNTY and by the U.S. Department of Health and Human Services...

- A. At a minimum, the following records shall be kept, and uploaded in the Provide® Enterprise Miami data management system under the appropriate placeholder under the View\Scanned Documents link:
 - (8) In accordance with HRSA Policy Notice No. 16-01 (<https://ryanwhite.hrsa.gov/grants/policy-notice>), Ryan White HIV/AIDS Program recipients and subrecipients may not deny services, including prescription drugs, to a veteran who is eligible to receive Ryan White HIV/AIDS Program services. Ryan White HIV/AIDS Program recipients and subrecipients may not cite “payer of last resort” language to compel HIV-infected veterans to obtain services from the Veterans Administration health care system or refuse to provide services. Ryan White HIV/AIDS Program recipients and subrecipients may refer eligible veterans to the Veterans Administration for services, when appropriate and available. However, Ryan White HIV/AIDS recipients and subrecipients may not require eligible veterans to access medical or supportive services in the Veterans Administration health care system nor deny them access to health care and support services funded by the Ryan White HIV/AIDS Program. In addition, this payer of last resort requirement does not apply to clients who are eligible for services covered by Indian Health Services; such clients may choose to access the Ryan White Program first.
- C. Based on client-level and service utilization data entered in the Provide® Enterprise Miami data management system, the SUBRECIPIENT shall submit Bi-annual Progress Reports, a qualitative report based on billing and service provision data, to the COUNTY on a form to be provided by the COUNTY, at dates to be determined by the COUNTY. Unless otherwise reduced by the COUNTY in writing, this reporting requirement will include a narrative of accomplishments, challenges, and technical assistance needs encountered during the fiscal year; as well as a reporting of progress made in relation to the National CLAS Standards. A reporting of informal complaints and/or formal grievances received and responded to by the SUBRECIPIENT may also be included as part of the Bi-annual Progress Reports. As a component of this report, if the data are not readily available in the Provide® Enterprise data management system, the SUBRECIPIENT may also be required to collect and report to the COUNTY, in a format to be provided by the COUNTY, information on specific client-level outcome measures as established by the COUNTY, and included herewith in Exhibit A as part of the Scope of Service(s).

The SUBRECIPIENT will also submit annually a signed assurance to accompany the second and final of the Bi-annual Progress Reports, in a format provided by the COUNTY for this reporting requirement. This assurance form shall be initialed and appropriately signed by the SUBRECIPIENT’s Board President and its Chief Executive Officer, and properly notarized or stamped with a corporate seal. This assurance will indicate that EHE cooperative agreement funds were used in

accordance with Uniform Guidance, HRSA policies, and Exhibit A, scope of services, of this Agreement, and do not include unallowable costs as detailed in Article VI, Section 6.9, of this Agreement.

CLIENT GRIEVANCE PROVISIONS REVIEWED DURING MONITORING SITE VISITS

During site visits, the Recipient reviews how each Subrecipient follows the Ryan White Program Client Grievance Policy and Procedures. The review ensures that Subrecipients have proper grievance processes in place and are meeting program requirements.

Key review areas include:

- Posting grievance information in visible and accessible areas for clients.
- Providing clients with a copy of the grievance policy and obtaining signed acknowledgment.
- Maintaining written procedures for managing complaints and formal grievances.
- Keeping an accurate and up-to-date complaint and grievance log.
- Documenting and resolving grievances within a reasonable timeframe.
- Training staff on client rights and the grievance procedures.

For more details, refer to the Miami-Dade County Ryan White Program Site Visit Monitoring Instrument, available at:

<https://www.miamidade.gov/global/management/ryan-white-program.page>

From the homepage, select **Provider Resources**, then click **Monitoring and Evaluation** to access the document.