



April 30, 2019

Dear Ryan White HIV/AIDS Program Parts A and B Recipients:

This letter provides an update to the process used and timing related to a request for an exemption to the annual subrecipient site visit monitoring requirement. The National Monitoring Standards (NMS) for the Ryan White HIV/AIDS Program (RWHAP) Parts A and B originally released in 2011 set the expectation that recipients conduct annual comprehensive monitoring site visits of all subrecipients. Subsequently, this expectation was incorporated as program guidance in the respective Part A and B Manuals.

On October 4, 2012, the Health Resources and Services Administration's (HRSA) HIV/AIDS Bureau (HAB) issued its initial guidelines for requesting an exemption from the annual site visit requirement. A subsequent letter dated October 10, 2017, further revised those guidelines by the following:

1. allowing multi-year exemptions from the annual site visit requirement based on an alternative comprehensive monitoring process for the jurisdiction;
2. detailing the process recipients must use to submit a request for a one-year or multi-year exemption; and
3. describing the process for implementation of a multi-year exemption if approved.

These revisions were made in response to feedback from recipients to help address implementation challenges and reduce burden on recipients. These revisions will be included within the National Monitoring Standards as they are revised.

#### Submission Deadline

To date, RWHAP Parts A and B recipients were required to request an exemption to the annual subrecipient site visit monitoring requirement prior to the start of the budget period for which they were seeking an exemption. This letter changes that timeframe.

Recipients may now submit an exemption request at any time up to six (6) months into the budget period for which they propose to implement an alternative comprehensive monitoring process. The corresponding dates would be no later than September 1<sup>st</sup> for RWHAP Part A and no later than October 1<sup>st</sup> for RWHAP Part B. Exemption requests submitted after these dates will not be considered. Recipients who do not submit an exemption request, or submit a late exemption request, will be required to meet the annual subrecipient site visit monitoring requirement for that budget period.

### Submission Process

To submit a request for an exemption from the annual site visit requirement, recipients must notify their project officer (PO) of their intention to request an exemption. The PO will initiate a Request for Information in the Electronic Handbooks (EHBs). The recipient must respond to the EHB task by the established due date with an exemption request that addresses the following:

- How many subrecipients does the program fund and monitor?
- What are the barriers and challenges to conducting annual site visits?
- If the program is unable to conduct annual site visits, what is the frequency and/or schedule of visits that the program can conduct?
- How many years are needed to conduct a full cycle of visits to all subrecipients?
- Does the state, eligible metropolitan areas, or transitional grant areas have a site visit protocol? If so, please attach in the EHB.
- What is the program's monitoring plan during the years that sub-recipients are not receiving a site visit?
- What is the program's process for issuing and monitoring corrective action plans?

If submitting a multi-year exemption, recipients must submit a site visit timeline and comprehensive monitoring plan that is appropriate for the scope and complexity of the jurisdiction's system of HIV care, and aligns with the grant budget period. The corresponding grant budget periods are March 1<sup>st</sup> through February 28<sup>th</sup> for RWHAP Part A and April 1<sup>st</sup> through March 31<sup>st</sup> for RWHAP Part B.

### Review Process

Upon receipt of the exemption request, the PO will initiate an internal review process within their respective division. The recipient will be notified of the outcome of the review within 30 days. The PO may request additional information from the recipient if needed to make a final determination. The timeline for review may increase due to the need for additional information.

### *Request Approval*

If the exemption request is approved, the duration of the exemption and other requirements will depend on the approved plan and will be detailed in an approval notification letter. Recipients will also receive notification of approval on their final Notice of Award (NoA) or revised NoA if a final has already been issued.

The exemption will remain in effect for the duration of the approved plan. For example, if the approved plan includes a three (3) year timeline for conducting site visits to all subrecipients and implementing an alternate comprehensive monitoring approach, then the exemption would be in effect for three (3) years. The PO will monitor adherence to the approved site visit timeline and comprehensive monitoring plan through monthly

monitoring calls and comprehensive site visits. Recipients also must provide updates on their subrecipient monitoring activities as part of their annual progress report submission.

Throughout the duration of the approved plan, exemption approvals are dependent upon satisfactory reporting on plan implementation during monthly monitoring calls and annual progress reports; and confirmed compliance with the approved plan during a HRSA HAB site visit. Recipients must obtain prior approval on any changes to their approved plan. When an approved exemption expires or is terminated due to non-compliance, recipients must submit a new exemption request for the subsequent year(s).

*Request Disapproval*

If the exemption request is denied, the PO will notify the recipient through EHB, and detail the reasons for the denial. If the initial exemption request is denied, the recipient may modify the request by addressing the reasons provided by HRSA HAB. HRSA HAB will follow the process outlined above when considering the re-submitted request.

If you have any questions regarding exemptions to the annual subrecipient site visit monitoring requirement, please contact your PO. Technical assistance is available for recipients who wish to improve or modify their comprehensive monitoring systems.

Sincerely,

/Steven R. Young, MSPH/  
Director  
Division of Metropolitan HIV/AIDS Programs

/Susan Robilotto, DO/  
Director  
Division of State HIV/AIDS Programs