

# DSHS HIV Care Services Parts A and B Meeting

April 23-24, 2015  
Holiday Inn Midtown in Austin, Texas

## **Treatment of Costs under the 10% Administrative Cap for Ryan White HIV/AIDS Program Parts A, B, C, and D**

A briefing on the Health Resources and Services Administration's (HRSA) *Policy Clarification Notice (PCN) #15-01 March 2015*

1. This PCN revises and clarifies the HRSA guidelines for the treatment of costs under the statutory 10% administrative cap for Parts A, B, C, and D.
2. In an effort to provide increased flexibility for recipients, HRSA re-examined the classification of costs subject to the 10% administrative cost cap.
3. This additional flexibility will better enable recipients (AA's) and subrecipients (providers) to provide core medical and support services to eligible clients while ensuring that Ryan White (RW) is the payer of last resort.
4. Some items previously admin-only can now be allocated to services if they can be directly tied to RW clients, such as:
  - rent, facilities maintenance, utilities, etc. related to core/support services to RW clients
  - malpractice insurance related to RW clinical care
  - Electronic Medical Records (EMRs) – maintenance, licensure, annual updates, data entry related to RW clinical care
  - Receptionist's time providing direct RW client services
  - 3<sup>rd</sup> party billing (Medicare, Medicaid, insurance, etc.)
  - Medical waste removal
  - ACA outreach & enrollment
  - Activities related to the bi-annual RW client recertification
  - Supervisor time devoted to professional oversight and direction regarding RW-funded core and support services/activities
  - RW clinical quality management (CQM). However, expenses which are clearly administrative in nature cannot be included as CQM costs.
5. Changes are effective for all grants awarded on/after January 1, 2015 but changes cannot be made retroactive to earlier grants.
6. Texas Department of State Health Services will implement this guideline for Ryan White Part B/State Services on September 1, 2015