



POLICY AND PROCEDURE NOTICE: PPPN-021 TECHNICAL ASSISTANCE

Summary and Purpose of PPN:

To guide the administration of the Ryan White Part A Program in supporting subrecipient compliance with regulations and in the provision of quality services to clients.

Authority:

- Fulton County Ryan White Part A Program Manual

Policy and Procedure:

Due to various needs that will arise for subrecipients and due to periodic updates of policies, procedures, rules, regulations, and guidance, the Department for HIV Elimination will provide technical assistance to subrecipients.

- A. In-depth technical assistance at the start of a contract for newly funded subrecipients and on an as-needed basis throughout the contract period.
 - Within one (1) month of the date that an agency commences services, the recipient will schedule an Orientation Site Visit or conference call. The recipient may choose to waive this requirement in specific situations, for example, if a previously funded program and its staff remain intact but fiscal and oversight responsibility move to a different umbrella organization.
 - The recipient will work with the newly funded agency on developing a plan and timeline for creating new policies and processes as necessary and may also schedule multiple technical assistance conference calls, meetings, and/or desktop monitoring or follow-up visits as necessary. The level of technical assistance and oversight required for a new agency is dependent on the capacity and infrastructure already in place and will be determined at the sole discretion of the Department for HIV Elimination.
 - The Ryan White Part A Data Manager will provide initial training on e2Fulton to the staff responsible for data entry and oversight. This will be done in a reasonable timeframe as established by the Recipient and Subrecipient.
 - The Ryan White Part A Quality Manager will provide initial training on quality management/improvement requirements to the staff responsible for quality management and oversight. This will be done in a reasonable timeframe as established by the Recipient and Subrecipient.
 - Fulton County's Fiscal Team will provide initial training on fiscal requirements to the staff responsible for fiscal management/fiscal integrity.

- B. Previously funded subrecipients will receive technical assistance regarding contract changes and revisions to Policies and Procedures on an as-needed basis throughout the contract period.
- C. Subrecipients may request additional technical assistance after the initiation of a contract.
 - Technical assistance needs that are minor and can be addressed quickly should be completed by email to the designated Project Officer when appropriate.
 - The recipient has three (3) business days to attempt contact with the subrecipient regarding the request. This timeframe may be extended if the appropriate staff is unavailable.
 - When contact is made, the Project Officer will assess the request and determine the most appropriate response with the agency.
 - Whenever possible, technical assistance will be documented in writing via email, either as the original source of the assistance provided or as a follow up to a verbal discussion.
- D. Further technical assistance:
 - As the recipient becomes aware of significant changes in of policies, procedures, rules, regulations, and guidance, the recipient may schedule a subrecipient meeting as necessary and as funding allows. Project Officers may also send out information via e-mail or coordinate conference calls for technical assistance. If changes are minor, Project Officers may provide technical assistance by e-mail.
- E. Technical assistance will also be provided in conjunction with site visits.
- F. The recipient may also initiate technical assistance if a need is identified.
 - Technical assistance will be provided mainly through e-mails, phone calls, meetings, and through the Fulton County Ryan White Part A website: www.ryanwhiteatl.org. Program staff will first attempt to resolve technical issues by phone or email. If TA is provided by phone, the appropriate staff will send a follow-up e-mail so both parties have the information in writing. Site visits will also be conducted as warranted by program needs.
- G. Technical assistance will include periodic Provider Meetings and/or webinars.
- H. Technical assistance will be provided after the release of Request for Proposals.
- I. The recipient will provide technical assistance to all subrecipients who are found to be out of compliance for contract provisions. Technical assistance will be provided by the Fulton County Government Grants Administration Division whenever possible to prevent imposing a sanction.

- Identifying the Need for Technical Assistance
 - The recipient will conduct informal reviews of each subrecipient on a monthly basis to ensure compliance with contract requirements, including reporting, fiscal, data, and program requirements.
 - The recipient will also conduct desktop audits and an on-site monitoring visit with each subrecipient on an annual basis to review the program for contract compliance and program performance.
 - The Ryan White Part A Data Manager will monitor each subrecipient monthly via CAREWare, and quarterly through agency RDR and RSR submissions to ensure compliance with the program.

- Implementing Technical Assistance
 - The subrecipient will be notified in writing immediately when found to be out of compliance with a contract requirement or policy.
 - The written notice can be delivered either by e-mail or mailed letter detailing the noncompliance, what action needs to be taken to correct the problem, and a timeline for correcting the problem.
 - If the problem can be corrected by the subrecipient without assistance, the subrecipient will be required to submit evidence that the problem has been corrected.
 - If the subrecipient requires additional technical assistance in order to correct the problem, the recipient will arrange a meeting, either via conference call or in person, to discuss steps that need to be taken and ways the Ryan White Part A Program can assist the subrecipient in correcting the problem.
 - The recipient will send the subrecipient written notification of compliance with the requirement once the Ryan White Part A Program receives sufficient evidence that the problem is corrected.

- Imposing Sanctions
 - The recipient will impose one or more sanctions when one of the following occurs:
 - The subrecipient fails to cooperate with the recipient or respond to the recipient regarding noncompliance with contract requirements.
 - The subrecipient fails to respond to adverse findings resulting from a site visit or a complaint filed against the subrecipient.
 - The subrecipient's actions or inactions adversely affect the provision of client services.
 - Any other situation in which the recipient determines that a finding of noncompliance warrants such action.

- The decision to impose a sanction depends on the severity of the finding or if similar or recurring problems have been found in the past.
- The recipient will work with subrecipients as much as possible to avoid the imposition of sanctions.

Approved: June 2016

Reviewed: June 2020