



**Nevada Office of HIV/AIDS
Ryan White Part B Program
Administrative Site Visit Survey**

Operating Policies	Yes	No	N/A	OoH Requirement	Comments
Does the subrecipient have a written Operational Policies and Procedures? <ul style="list-style-type: none"> • If YES, what was the last date of the update: • If NO, end site visit, note the finding and implement a corrective action plan 					
<ul style="list-style-type: none"> • Employee Code of Ethics or Standards of Conduct (Personnel Policies) including: 					
<ul style="list-style-type: none"> • Conflict of Interest 					
<ul style="list-style-type: none"> • Policy that prohibits signing bonuses, kickbacks, and referral bonuses 					
<ul style="list-style-type: none"> • Client Confidentiality 					
<ul style="list-style-type: none"> • Fraud, waste, and mismanagement 					
Does the subrecipient have a written Drug Free Workplace Policy?					
Does the subrecipient have a written Equal Employment Opportunity and/or Affirmative Action Policy?					
Does the subrecipient have a written Sexual & Unlawful Harassment Policy?					
Does the subrecipient have a written HIPAA Policy?					
Does the subrecipient have a written Policy and Procedure for informal complaints and formal grievances that includes, at a minimum the following:					
Non-binding procedure for resolving conflicts					
Separate processes for informal complaints and formal grievances					
Reasonable timeline for addressing complaints and grievances					
Description of the types of grievances and individuals covered					



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Meeting between the grievant and the Executive Director, or a Board					
Written subrecipient response to the grievant or the grievant's care					
Operating Policies cont'd	Yes	No	N/A	OoH Requirement	Comments
Do the Grievance Policies and Procedures specifically address client grievances or complaints?					
Do the Grievance Policies and Procedures specifically address staff grievances or complaints?					
Does the subrecipient have a written policy regarding workplace violence?					
Does the subrecipient have a written whistle-blower policy?					
Personnel Policies & Procedures	Yes	No	N/A	OoH Requirement	Comments
Does the subrecipient have a written Personnel Policies and Procedures?					
<ul style="list-style-type: none"> If so, when were the Personnel Policies and Procedures last updated? (Request a copy) 					
Does the subrecipient have a written policy to prohibit lobbying by staff whose salaries are covered in whole or in part by Federal funds?					
Does the subrecipient have a written policy to discourage large signing bonuses?					
Does the subrecipient have established job descriptions for all Ryan White Part B Program-funded staff? (Review a sample of the job descriptions)					
Are Equal Employment Opportunity, Workers' Compensation, Family Leave Act, and other mandated or relevant information conspicuously displayed by the subrecipient?					



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Are fraud, waste, and mismanagement and other relevant information conspicuously displayed by the subrecipient?					
Personnel Policies & Procedures cont'd	Yes	No	N/A	OoH Requirement	Comments
Are professional licenses for Ryan White Program-funded staff current and appropriate for the services provided by the organization (as applicable)?					
Does the subrecipient have excessive or significant staff turnover? If yes, explain how the subrecipient has addressed this issue?					
Access to Care	Yes	No	N/A	Page of NMS 2022	Comments
Structured and ongoing efforts to obtain input from people with HIV in the design and delivery of services					
<ul style="list-style-type: none"> Maintain file of materials documenting the consumer committee's membership and meeting attendance, including minutes 				132	
<ul style="list-style-type: none"> Regularly implement client satisfaction survey tools, focus groups, and/or public meetings, with analysis and use of results documents 				132	
<ul style="list-style-type: none"> Implement appropriate mechanism for obtaining client input 				132	
Provision of services regardless of an individual's ability to pay for the service					
<ul style="list-style-type: none"> Ensure that billing, collections, copays, and schedule of charges and limitation of charges policies do not act as a barrier to receiving services, regardless of the client's ability to pay 				132-133	
<ul style="list-style-type: none"> Implement an appeals/grievance process and maintain a file of individuals who refused services with reasons for 				132-133	



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refusal specified; include in the file any complaints from the client, with documentation of complaint review and decision reached and/or response given if any					
Provision of services regardless of the current or past health condition of the individual to be served					
<ul style="list-style-type: none"> Maintain files of eligibility determination and clinical policies 				133	
<ul style="list-style-type: none"> Implement an appeals/grievance process and maintain a file of individuals who refused services with reasons for refusal specified; include in the file any complaints from the client, with documentation of complaint review and decision reached and/or response given if any 				133	
Provision of services in a setting accessible to individuals with HIV who are low-income and comply with the Americans with Disabilities Act (ADA) Barrier-Free Health Care Initiative.	Yes	No	N/A	Page of NMS 2022	Comments
<ul style="list-style-type: none"> Ensure that the facility is accessible by public transportation or provide transportation assistance 				134	
<ul style="list-style-type: none"> Ensure that the facility is compliant with the ADA Barrier-Free Health Care Initiative requirements 				134	
Dissemination of information to low-income individuals regarding the availability of HIV-related services and how to access them					
<ul style="list-style-type: none"> Maintain a file documenting subrecipient activities for the promotion of HIV services to low-income individuals, including copies of HIV program materials promoting services and explaining eligibility requirements 				135	
Eligibility Determination	Yes	No	N/A	Page of NMS 2022	Comments
Eligibility determination of clients as specified by the jurisdiction or AIDS Drug Assistant Program (ADAP)					



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<ul style="list-style-type: none"> Develop and maintain client records that contain documentation about eligibility determination including Initial proof of diagnosis, low-income, proof of residence, proof of compliance 				135-136	
<ul style="list-style-type: none"> Conduct periodic reviews based upon recipient policies and procedures 				135-136	
<ul style="list-style-type: none"> Document compliance with eligibility determination as defined by the jurisdiction or ADAP 				135-136	
<ul style="list-style-type: none"> Document that all staff involved in eligibility determination and confirmation have participated in required training 				135-136	
Payor of Last Resort					
<ul style="list-style-type: none"> Maintain policies and document their efforts to ensure they assist clients in enrollment of health care coverage outside of ADAP where eligible 				137	
<ul style="list-style-type: none"> Conduct periodic checks to identify any potential changes to eligibility and require clients to report changes 				137	
<ul style="list-style-type: none"> Document that staff have participated in third-party payment training 				137	
<ul style="list-style-type: none"> Ensure subrecipient client data reports are consistent with requirements specified by funder that clients are receiving allowable services 				237	
Ensure military veterans with Department of Veteran's Affairs (VA) benefits are deemed eligible for RWHAP services	Yes	No	N/A	Page of NMS 2022	Comments
<ul style="list-style-type: none"> Ensure that policies and procedures classify those eligible for VA benefits are exempt from the Payor of Last Resort (PoLR) requirement 				137-138	
Ensure American Indians (AI) and Alaska Natives (AN) are provided with access to RWHAP Services					



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<ul style="list-style-type: none"> Ensure policies and procedures classify those eligible for Indian Health Services benefits are exempt from PoLR requirement 				138	
Anti-Kickback Statute (AKS)	Yes	No	N/A	Page of NMS 2022	Comments
<ul style="list-style-type: none"> Corporate Compliance plan, if a Medicare and/or Medicare provider, that provides for a Compliance Officer, compliance committee, how to report non-compliance, auditing, corrective action plan 				138-140	
<ul style="list-style-type: none"> Anti-kickback policy that prohibits the solicitation of cash or in-kind payments for contracts, referring clients, purchasing goods and/or services, and submitting fraudulent billing 				138-140	
<ul style="list-style-type: none"> Uses and application of safe harbor laws 				138-140	
<ul style="list-style-type: none"> Written bylaws and board policies if non-profit, including conflict of interest, prohibitions on use of organization assets for personal use, procedures for open communication 				138-140	
<ul style="list-style-type: none"> Code of Ethics or Standard of Conduct including conflict of interest, prohibition on use of agency property, fair and open competition, confidentiality, use of company assets, timely and truthful disclosure of accounting, and penalties and disclosure procedures for conduct deemed to be felonies 				138-140	
<ul style="list-style-type: none"> Written personnel policies that discourage large signing bonuses 				138-140	
<ul style="list-style-type: none"> Written personnel policies that discourage hiring person with criminal record relating to, or who are currently being investigated for healthcare fraud 				138-140	
<ul style="list-style-type: none"> Maintain documentation of service contracts, key employee background checks, recruitment policies, and audits and finding 				138-140	



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Recipient Accountability	Yes	No	N/A	Page of NMS 2022	Comments
Proper Stewardship of all grant funds, including compliance with programmatic requirements					
<ul style="list-style-type: none"> • Develop/maintain policies and procedures manual that meets federal and Ryan White HIV/AIDS Program (RWHAP) fiscal and programmatic requirements 				140-141	
<ul style="list-style-type: none"> • Documenting policies and procedures are being followed 				140-141	
Demonstrate structured and ongoing efforts to avoid fraud, waste, and abuse in any federally funded program					
<ul style="list-style-type: none"> • Personnel policies 				143	
<ul style="list-style-type: none"> • Corporate Compliance (if providing Medicare or Medicaid-reimbursable services) 				143	
<ul style="list-style-type: none"> • Code of Ethics or Standard of Ethics 				143	
<ul style="list-style-type: none"> • Bylaws and board policies 				143	
<ul style="list-style-type: none"> • File documentation of any employee or board member violating Ethics and Conduct Standards 				143	
<ul style="list-style-type: none"> • Documentation of any complaint of a violation of Ethics and Conduct standards and its resolution 				43	
<ul style="list-style-type: none"> • Not-for-profit subrecipient organizations, ensure documentation of board bylaws, Code of Ethics, business conduct practices 				143	
Business management systems that meet the requirements of 45 Code of Federal Regulations (CFR) Part 75	Yes	No	N/A	Page of NMS 2022	Comments
<ul style="list-style-type: none"> • Documented policies and procedures for 45 CFR Part 75 				143-144	
<ul style="list-style-type: none"> • Fiscal/programmatic reports that provide effective control over and accountability for all funds in accordance with federal and RWHAP requirements 				143-144	



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Reporting	Yes	No	N/A	Page of NMS 2022	Comments
Submission of standard reports as required in 45 CFR Part 75, as well as program specific reports as outlined in the Notice of Award					
<ul style="list-style-type: none"> Submission of timely subrecipient reports 				144-145	
<ul style="list-style-type: none"> File documentation or data containing an analysis of required reporting to determine the accuracy and reconciliation with existing financial or programmatic data. Ex: Federal Financial Report 				144-145	
<ul style="list-style-type: none"> Submission of periodic financial reports that document the expenditures of RWHAP funds, positive and negative spending variances, and how funds have been reallocated to other line items or service categories 				144-145	
Monitoring	Yes	No	N/A	Page of NMS 2022	Comments
Grant subrecipient receiving federal funding is required to monitor for compliance with federal requirements and programmatic expectations					
<ul style="list-style-type: none"> Participate in and provide all material necessary to carry out monitoring activities 				146	
<ul style="list-style-type: none"> Monitoring activities expected to include annual site visits for all subrecipients 				146	
<ul style="list-style-type: none"> Establish policies and procedures to ensure compliance with federal and programmatic requirements 				146	
<ul style="list-style-type: none"> Submit audit reports 				146	
Provide Ryan White Part B with access to financial documentation, client charts, and other documents needed for monitoring				146	



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<ul style="list-style-type: none">• Monitor staff salaries to determine whether salary rate limitation is being exceeded				146	
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