

# MEMORANDUM

## Nevada Ryan White Parts ABCD



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TO: Ryan White Recipient and Subrecipient Agencies

FROM: **Heather Shoop, Assistant Manager**  
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SUBJECT: Update to Eligibility Dates and Recertification Policy

DATE: March 25, 2026

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Effective **April 1, 2026**, the Nevada Ryan White Program adopts **annual eligibility recertification** for all Ryan White clients. Mandatory 6-month recertifications are discontinued. This policy supersedes any mandatory 6-month eligibility recertification

This policy establishes a **12-month (annual) eligibility determination and recertification standard** for Ryan White HIV/AIDS Program (RWHAP) clients served within the **State of Nevada**, while maintaining program integrity through **event-based interim assessments** consistent with Health Resources and Services Administration (HRSA) and HIV/AIDS Bureau (HAB) requirements.

Eligibility periods will continue to be based on birthday months. All initial and annual certifications will be aligned to end in the client's birthday month.

### I. Regulatory Authority

- HRSA/HAB PCN 21-02
- HRSA/HAB PCN 16-02
- 2 CFR §200.302

### II. Policy Statement

Eligibility shall be established for a **12-month eligibility period**, provided that required eligibility criteria are met and documented in accordance with HRSA/HAB guidance and Nevada Ryan White Universal Eligibility service standards. Initial eligibility will be established for new and returning clients to be the number of months needed to reach the client's next birthday month. If a client would have to return after one month for renewal, they will instead be granted 13 months of eligibility.

### III. Annual Eligibility Recertification (12-Month Standard)

#### A. Timing

- Full eligibility recertification is required **once every 12 months**
- The eligibility period begins on the **date of eligibility determination**
- Services may continue uninterrupted during the eligibility period

#### B. Required Annual Elements

At annual recertification, subrecipients must verify and document the following. Clients will receive a  
Update to Eligibility Dates and Recertification Policy March 2X, 2026

reprieve on their first recertification if they attend a recertification on their half-birthday month and do not bring in required documentation. This reprieve will only be extended once and only between 04/01/2026 and 03/31/2027:

### 1. Income Eligibility

Clients must have household income **at or below 400% of the Federal Poverty Level (FPL)**, as adopted by Nevada Ryan White Universal Eligibility Service Manual.

- Income calculations must follow **gross household income**
- Household size must be documented
- Acceptable documentation must align with Nevada Ryan White Universal Eligibility Manual.

### 2. Residency Requirement

Clients must reside within the identified **Nevada service area** and acceptable documentation must align with Nevada Ryan White Universal Eligibility Manual.

### 3. HIV Status

Clients must have documented HIV diagnosis consistent with HRSA/HAB minimum standards. Once verified, **HIV status does not require re-verification annually** unless documentation is missing or invalid.

### 4. Insurance Status

Insurance status must be reviewed and documented at:

- Initial eligibility
- Annual recertification
- Interim reassessment when insurance changes are reported

## IV. Interim (Event-Based) Eligibility Reassessment

### A. Nevada Universal Definition

An interim reassessment is a **limited eligibility review** triggered by a **material change** and is **not a full recertification**. Proof of changes to information will be uploaded into RWISE and a referral sent to ADAP/NMAP to ensure clients' ADAP/NMAP services are not interrupted.

### B. Triggering Events

Interim reassessments may occur when:

- Client reports income change
- Client moves within or outside the identified service area
- Insurance status changes
- Staff become aware of other eligibility-affecting changes

### C. Documentation Standards

- Only the **changed eligibility element** must be reassessed
- Use the proper documentation to identify the change.
- Self-attestation may be used when permitted by Nevada Ryan White Universal Eligibility Manual
- Interim reassessments **DO NOT reset the annual eligibility clock**

## V. Continuity of Services & Grace Periods

- Clients remain eligible throughout the 12-month period unless found ineligible.
- Subrecipients must provide **reasonable notice and assistance** prior to eligibility expiration.
- Temporary administrative delays may not be used as grounds for service denial.
- Clients who fail to renew eligibility in a timely manner, meaning before the end of their birthday month, will be required to establish eligibility as though they were a new or returning client.

## VI. Subrecipient Responsibilities

Subrecipients must:

- Align internal eligibility procedures with this policy.
- Ensure that eligibility staff understand **annual vs. interim** distinctions
- Maintain eligibility documentation in the client file.
- Make files available for **desk reviews and onsite monitoring by the recipient(s) office(s)**.
- Prohibit staff-created local requirements that exceed Recipient policy.

If you have any questions, please feel welcome to contact either Heather Shoop ([Heather.Shoop@ClarkCountyNV.gov](mailto:Heather.Shoop@ClarkCountyNV.gov)) or Tory Johnson ([ToJohnsonHealth.NV.Gov](mailto:ToJohnsonHealth.NV.Gov)).