

THE EFFI BARRY
TRAINING INSTITUTE

**WRITING
POLICIES
&
PROCEDURES
FOR RYAN WHITE
EARLY INTERVENTION SERVICES**

WRITING POLICIES AND PROCEDURES FOR RYAN WHITE EARLY INTERVENTION SERVICES

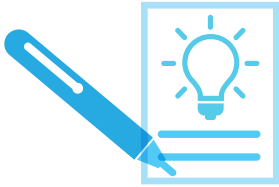
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WRITING POLICIES AND PROCEDURES FOR RYAN WHITE EARLY INTERVENTION SERVICES

INTRODUCTION



This toolkit serves as a guide for Ryan White HIV/AIDS Programs in the development of Administrative, Clinical, and Fiscal Policies and Procedures. Program managers can use this resource, in addition to the support provided by your HRSA/HAB project officer, to write, update, and develop effective standard operating procedures.

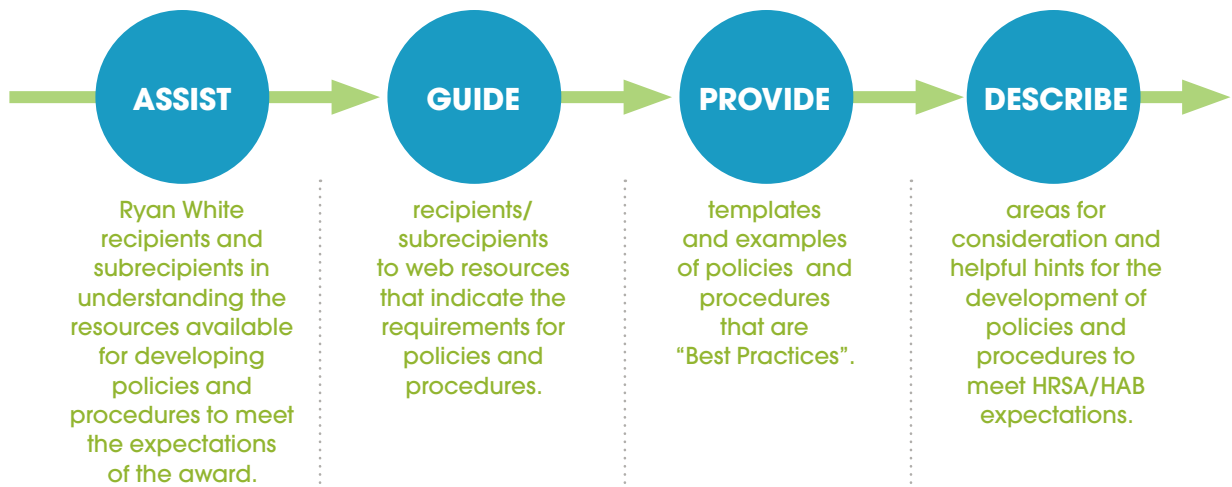
WHY POLICIES & PROCEDURES?



Policies and procedures are reviewed for compliance and consistency during a HRSA/HAB site visit, but they are also important for maintaining day-to-day operations. Policies and procedures ensure that organizations are functioning within the program's national standards or program expectations, and that the entire program and staff are working toward the same goals and objectives. Policies and procedures also provide a plan for sustainability during employee or leadership transitions.

OBJECTIVES

This toolkit will:



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WHERE TO START

When developing policies and procedures, a new recipient/subrecipient must first identify a team of agency staff that will review all current HRSA/HAB regulations and policy notifications that are appropriate for the Ryan White award. A thorough understanding of the expectations will ensure appropriate policies and procedures are created. Be sure to review any questions with your HRSA/HAB Project Officer.

Ryan White Part A and B Programs have Program Manuals and Administrative and Fiscal Monitoring Standards available that must be taken into consideration when developing policies and procedures. If the agency receiving the HRSA/HAB grant is part of a larger entity, such as a state or local government, there are many departments that will have standardized policies and procedures for Administrative and Fiscal operations. The agency's Project Director must review all existing policies and determine where there is need to modify the current policies and procedures to be compliant with the HRSA/HAB.

While Ryan White Parts C and D do not have HRSA/HAB-developed Program Manuals or Administrative and Fiscal Monitoring Standards, many agencies have developed Administrative, Fiscal, and Clinical Policies and Procedures for agency use or other federal programs. If these are available, they should be reviewed for compliance with the HRSA/HAB Ryan White funding rules and regulations.



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STAFF RESPONSIBILITIES



Staff that are responsible for implementing particular procedures should be included in the development of those procedures. This provides an understanding of what is required and how it will be accomplished. Sharing the responsibility of writing and updating policies and procedures with staff of varying expertise leads to increased engagement and improved outcomes following implementation.

Once policies and procedures are developed, newly released HRSA/HAB Policy Clarification Notices and Program Letters or updates must be carefully reviewed to determine any impact to Policies and Procedures, or the need to develop new ones.

For example: Upon the release of **18-02 The Use of Ryan White HIV/AIDS Program Funds for Core Medical Services and Support Services for People Living with HIV Who Are Incarcerated and Justice Involved is released**. Upon receipt, the agency's Policy Notice should be reviewed, and existing recipient policies regarding the use of HRSA/HAB funding for services for incarcerated persons living with HIV should be updated. New procedures should be written to address any changes needed, no later than the date of any new RSA/HAB award after November 30, 2018. If your agency is awarded a Ryan White Part B grant, the 2019 grant award starts on April 1, 2019. If any part of your grant award is used for incarcerated individuals, revised and/or new policies and procedures need to be developed. Your service providers need to be prepared to implement these revised/new policies no later than April 1, 2019.



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HRSA/HAB RYAN WHITE RECIPIENT POLICIES GUIDE

This guide is to be used as a supplement to the information and guidelines provided to HRSA/HAB recipients. All policies and procedures are living documents that should be reviewed at least annually and updated as needed. Each time HRSA/HAB releases a Policy Clarification Notice or Program Letter, the respective policy or procedure area addressed must be reviewed and updated as soon as possible, and no later than the effective date of the new policy. All Policies and Procedures must, at a minimum, meet the requirements of HRSA/HAB as set forth in the Legislation and the HRSA Monitoring Standards.

Using a standard policy structure makes your policy document clear and organized. This will ensure your document is easy to understand and navigate in a pinch. The more organized these manuals are, the better prepared your agency will be when HRSA/HAB staff are auditing the program.



Adhering to a template or structure will also streamline the writing process and save time for you. In addition to organizing your policies and procedures clearly, your agency should determine what sections and information you will cover in each policy.

Ideas: **Sample Policy Document Inclusions:**

1. Document Header:

Information about the policy including title, effective/revision dates, approver's signature, and department.

2. Introduction/Purpose Statement:

What is the policy about and the reason for having the policy? This will often be the HRSA/HAB requirement that is being addressed.

3. Policy Statement:

What is the stance that your agency will assure the HRSA/HAB requirement is met?

4. Definitions:

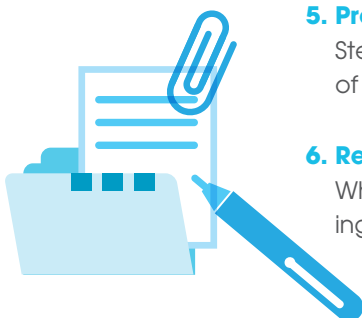
It's important to define terms throughout your policy document, especially for words and phrases with multiple meanings. This will make policies clear and easy to follow for all staff involved.

5. Procedures:

Step-by-step instructions for routine tasks and operations to ensure the implementation of the policy requirements.

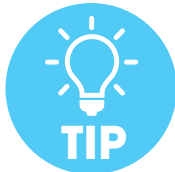
6. Reporting Requirements:

What data and documentation employees need to keep and report when implementing this requirement.



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HRSA/HAB RYAN WHITE RECIPIENT POLICIES GUIDE



Policy and Procedure Writing Tips

1. Form a policy management team

Developing a team to write your policies and procedures is a great way to ensure you include everything necessary. Because your policies cast a wide net across your organization, consider drawing people from different departments for input.

2. Prioritize a policy list

You can't tackle every policy at once. Meet with your policy team to create a list of new policies that need to be written and existing policies that need revisions or updates. The best way to stay on track is to keep your end goal in mind throughout the process.

3. Write an initial draft of your Policy and Procedure

After determining what you need to cover, begin your first draft. You will want to make your policy and procedure manual as clear as possible. Having someone other than the policy owner write the initial draft helps facilitate an outsider's perspective, making your procedures more transferable to daily operations. This also helps to simplify the language and remove technical jargon that clutters your document.

4. Validate the procedures included

To ensure your procedures make sense, you need to see them in action. A best practice would be to have the employees who do the daily work perform the procedures. This validation only applies to the process and procedures portion, not the policy/prohibited actions aspect.



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CLINICAL POLICIES AND PROCEDURES

There are several resources available for developing clinical policies and procedures. The U.S. Department of Health and Human Services (HHS) issues a series of guidelines to help clinicians provide care and treatment to people living with HIV in the United States. A Ryan White HIV/AIDS Program recipient must follow the [HHS Clinical Guidelines for the Treatment of HIV/AIDS](#). These guidelines and recommendations are intended for clinicians, public health professionals, Ryan White HIV/AIDS Program recipients, program managers in clinical and non-clinical settings, people living with HIV, and the general public. These [Clinical Guidelines for the Treatment of HIV/AIDS](#) are frequently updated.

The following HIV-related protocols and clinical practices have been developed by various panels of HRSA experts and other leaders in the field of HIV care and treatment. These guidelines are updated on an ongoing basis.



Resources

[Guide for HIV/AIDS Clinical Care, 2014](#) (PDF - 6 MB)

[A Guide to the Clinical Care of Women with HIV, 2013](#) (PDF - 4.7 MB)

[A Guide for Evaluation and Treatment of Hepatitis C in Adults Coinfected with HIV, 2011](#) (PDF - 381 MB) HIV-related protocol

The AIDS Education and Training Centers website at: <https://aidsetc.org/> has a wealth of resources for clinical recipients.

HRSA/HAB has very specific requirements for client eligibility and recertification that can be found at: [Clarifications on Client Eligibility Assessment and Recertification Requirements for Grant Recipients of the Ryan White HIV/AIDS Program](#). Policies and procedures need to be developed and followed for the initial and ongoing review of Ryan White client eligibility.

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FISCAL MANAGEMENT POLICIES AND PROCEDURES



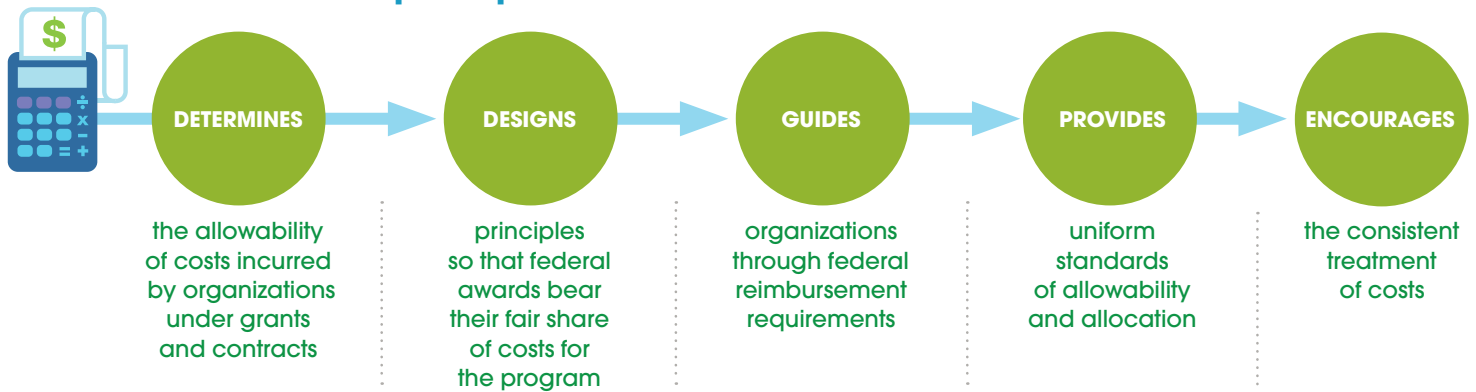
Every organization should have a separate financial/accounting manual for policies and procedures to provide clear instructions on how financial transactions will be carried out in a consistent, timely, and accurate manner. The purpose of a detailed financial manual is to ensure the safeguarding of assets, the prudent management of those assets, and to make certain that financial statements are prepared in conformity with Generally Accepted Accounting Principles.

The policies and procedures of an organization should take into consideration the internal controls necessary to properly protect the assets entrusted to the organization for the benefit of its programs and services to Ryan White clients. All personnel are expected to be aware of and adhere to the policies in the manual. As policies and procedures are created, they should be formulated to consider proper segregation of duties. There should also be consideration given to training and communication of the policies so staff is informed and knowledgeable.

Review the [Fiscal Monitoring Standards: Part A and Part B](#).

Within these Fiscal Monitoring Standards, a large portion of the “Provider/Subgrantee Responsibility” information applies to Parts C and D, as well as other client service providers. When the information is generic and applies to the funds being awarded from HRSA/HAB, the requirements are applicable to all funding streams, and are not specific to Parts A, B, C, or D. Identify areas that relate to the overall funding restrictions that also apply to your grant award.

Cost principles:



Cost principles also examine the factors behind what makes a cost allowable. Carefully review and follow the Office of Management and Budget (OMB) Circular applicable to your organization and establish written policies and procedures to address the allowability of costs for your federal grant. The allowability of costs is important for all staff to understand. This is not the sole responsibility of the fiscal department.

FISCAL MANAGEMENT POLICIES AND PROCEDURES

All parts provide services to clients, and various parts of the Ryan White HIV/AIDS programs require policies to address limitations, primarily the prohibition of cash payments directly to clients. One example to address this restriction can be found in the Fiscal Monitoring Standards for Part B on page 10 under “Provider/Subgrantee Responsibility”. These standards state that an agency must “maintain documentation of policies that prohibit use of Ryan White funds for cash payments to service recipients. Please note that this can be a singular policy addressing this one prohibited use of funds, or it can be a blanket policy that contains a full listing of when HRSA/HAB funds cannot be used. The policy should have the heading of “Prohibited use of funds.” The written procedures should also indicate a specified, regular interval review of case notes and expenditures to ensure that no cash payments were made to individuals.

The Imposition of Charges: Glossary of Terms and Webinar was hosted by HRSA/HAB in January 2019. The Imposition of Charges requirement is a term used to describe all activities, policies, and procedures related to assessing Ryan White patient charges as outlined in the Ryan White legislation.



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WEB-BASED RESOURCES

Below you will find web-based resources to assist your agency in drafting policies and procedures. Ensure that the information in your policies is up-to-date and meet the requirements of your HRSA/HAB award.



1. Policies and Procedures Handbook

<https://www.nationalservice.gov/sites/default/files/resources>

There are limited sample forms included for your reference, but this handbook will guide you through the process.

2. Medical Clinic Policy and Procedures Manual (Updated)

www.cpsa.ca/wp-content/uploads/2017/04/Sample-Policy-Procedure-Manual.pdf

3. POLICIES AND PROCEDURES MANUAL

www.pbhsi.com/wp-content/uploads/2015/12/Policy-Procedures-Manual.pdf

4. Accounting Procedures Manuals Templates for Internal Control

https://www.copedia.biz/Accounting_Policies_Procedures_Manual_s/1.htm

These policies, procedures, and accounting controls work together to form an ideal manual for smaller businesses and non-profits.

5. Writing Effective Healthcare Policies And Procedures

<https://www.policymedical.com/how-to-write-effective-healthcare...>

This resource contains tips and guidelines for writing effective healthcare policies and procedures.

6. How to Structure Compliance Policy Documents

<https://www.complianceresource.com/publications/how-to-structure-compliance-policy-documents>

7. Clinic Policy and Procedures Manual

https://cdn.dal.ca/content/dam/dalhousie/pdf/dentistry/DENT_Clinic%20Policy%20and%20Procedure%20Manual%202016-2017%20Sept%202016%20.pdf

8. Policies and Procedures Writing - Easy to Use Methods and ...

www.companymanuals.com/index.htm

Best-selling policies and procedures books by Stephen Page. Discover methods, business processes, and templates to use to write effective, successful, consistent, logical, and reliable policies and procedures.

9. Financial Management | National Council of Nonprofits

<https://www.councilofnonprofits.org/tools-resources/financial-management>

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THE EFFI BARRY TRAINING INSTITUTE

The Effi Barry Training Institute provides trainings and technical assistance to support current and prospective HAHSTA grantees and community-based organizations in the Fee-for-Service business process; basic HIV service competencies; advanced skills in health care systems, data and health informatics; high-impact prevention programs, including biomedical; and emerging evidence-based or informed approaches through a series of group-level trainings, boot camps, community forums, and individual consultation.

Rooted in the idea of holistic, integrated, patient-centered care, HealthHIV capacity building efforts help develop an organization's ability to improve patient outcomes and increase efficiencies, while remaining organizationally sustainable. The agency's unique approach involves structuring sustainable systems and services that span the HIV care continuum. HealthHIV's ability to diagnose and address multisystem challenges is enhanced by a comprehensive team of expert consultants and focuses on achieving measurable outcomes. By remaining data and outcomes driven, HealthHIV employs state-of-the-art, and state-of-the-sciences approaches to improve health care delivery.

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