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To: Ryan White Part B Service Providers

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**Ryan White Part B and Life Care Services
Emergency Financial Assistance Policy in Response to COVID-19**

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Background

On March 12, 2020, Governor Evers proclaimed a public health emergency for the state of Wisconsin in response to COVID-19. The Wisconsin HIV Program is making additional funding available to all subrecipients currently receiving Ryan White funds for the purposes of providing emergency financial assistance (EFA) to people living with HIV (PLWH) who are eligible for Ryan White services in Wisconsin for the duration of this public health emergency.

This guidance will be re-evaluated 60 days from issuance or when the public health emergency in the state of Wisconsin is lifted, whichever comes first.

Definition

EFA provides limited assistance to a Ryan White Part B client with an urgent need for essential items or services necessary to improve health outcomes. The goal of EFA during the public health emergency is to ensure people living with HIV retain access to essential items in a time of scarcity and thinning of the social safety net, maintain best-practice social distancing, and protect vulnerable populations from exposure to COVID-19.

The allowable categories of EFA during the COVID-19 public health emergency are:

1. Housing
2. Utilities
3. Food
4. Medication not covered by the Wisconsin AIDS Drug Assistance Program or another payer
5. Personal hygiene items and cleaning supplies
6. Child care during medical or HIV-related appointments
7. Medical supplies such as thermometers, gloves, and face masks

Federal guidance states that EFA provides limited one-time or short-term payments to assist a client with urgent needs. The Wisconsin HIV Program has determined that, in the best interest of preserving the health of PLWH and the public, the “short-term” of the EFA definition can be equivalent to the duration of the public health emergency in the state of Wisconsin.

Eligibility

The client’s eligibility for Ryan White Part B services must be determined or be in the process of being determined before EFA services are initiated. Client eligibility for Ryan White services must be documented in the client’s files.

Normal expectations for documenting the following eligibility requirements apply to clients receiving EFA during this period:

- Proof of HIV status (during initial eligibility determination only)
- Proof of income below 500% FPL
- Proof of Wisconsin residency
- Proof of insurance

Provider of Last Resort

Ryan White funds are intended to be used as a last resort after all other potential sources of funding have been exhausted. However, a client’s urgent financial need may arise in a situation that does not allow a subrecipient organization to exhaustively search for alternative sources of funding. Subrecipient organizations are expected:

- To use their discretion in balancing the best interest of the client and the limited nature of Ryan White funding.
- To develop procedures to prevent mismanagement of these funds.
- To thoroughly document uses of EFA funding.

Required Documentation

The client’s record must contain documentation of the following:

- The client’s eligibility for Ryan White services
- The need for EFA
- Dates when EFA funds were requested and provided
- The purpose of the EFA funds
- The amount of assistance given to the client
- The method of providing EFA (i.e., voucher, direct payment to agency, direct payment to landlord, etc.)
- The frequency and duration of EFA, to the best of the documenter’s ability. For example, “Client is receiving EFA to help with utility payments once a month for the duration of COVID-19 state of emergency” is acceptable.

Allowable Uses of EFA Funds

EFA funds can be used to make payments in the following categories:

1. Housing costs

EFA can be used to provide temporary housing assistance to PLWH who are experiencing housing instability or loss of wages due to COVID-19.

For the duration of the Wisconsin Public Health State of Emergency, limits on how many times clients can receive EFA for housing assistance are lifted. If clients continue to need assistance with housing after the state of emergency is lifted, the client should then be enrolled in a housing program and have an individualized housing plan in place in accordance with the Wisconsin HIV Program Ryan White Part B and Life Care Services Housing Policy (effective July 15, 2019).

When providing EFA for housing assistance, please check whether the county or municipality has issued a moratorium on evictions.

2. Utilities

EFA can be used to pay for electricity, heat, internet, and telephone (landline or mobile). These payments must be made directly to the utility company or through the purchase of gift cards or vouchers to utility companies.

For the duration of the Wisconsin Public Health State of Emergency, limits on how many times clients can receive EFA for utility assistance are lifted.

When providing utility EFA, please check whether the client's county or municipality has issued a moratorium on utility shutoffs.

3. Food

EFA can be used to provide food through gift cards or vouchers to grocery stores, by paying for groceries using grocery delivery services, or by providing vouchers for prepared meals. This category of EFA can also be used to pay for nutritional supplements.

If EFA is provided using grocery delivery services, any associated delivery charges are an allowable EFA cost.

4. Medication Not Otherwise Covered by ADAP or Another Payer

EFA can be used to pay for medications not otherwise covered by ADAP or another payer. This EFA category includes over-the-counter (OTC) medications and medications not covered by the ADAP formulary.

5. Personal hygiene items

EFA can be used to pay for personal hygiene items and household cleaning supplies essential to preventing the spread of COVID-19. This category includes items such as soap, hand sanitizer, household cleaning sprays and soaps, trash bags, facial tissues, toilet paper, and menstrual products.

6. *Child Care*

EFA funds can be used to provide child care while clients attend medical appointments or other appointments related to their HIV care.

Subrecipients must pay for child care through checks issued directly to the provider or through a voucher system. Direct payments to clients and reimbursements are not allowable under any Ryan White funds.

7. *Medical Supplies*

EFA can be used to purchase medical supplies essential to preventing the spread of COVID-19, including thermometers, gloves, and masks. Subrecipients should use their discretion when determining whether a medical supply item is an allowable expense under this category and to consider the item's relevance to either preventing the spread of COVID-19 or to improving the client's health outcomes.

Restrictions on the Use of EFA Funds

EFA can be used by a client as many times as needed until the public health emergency is lifted or until guidance from the Wisconsin HIV Program states otherwise. Subrecipient organizations can use their discretion to limit EFA, but the Wisconsin HIV Program is not currently instituting any monetary caps, time limits, or maximum dollar limits on EFA during the COVID-19 public health emergency. The Wisconsin HIV Program reserves the right to revise this guidance or add caps at a later date, with proper notice to all subrecipients.

The following restrictions on the use of EFA funds apply:

- Direct cash payments to clients, including reimbursement for purchases, are not permitted. EFA must occur as a direct payment to an agency or through a voucher program.
- Cash-equivalent gift cards that can be used like a credit or debit card are not an allowable Ryan White expense.
- Subrecipients can use their discretion in instituting limitations on client use of EFA funds.
- EFA cannot be used to pay for wage replacements or stipends.

The following items are not allowable uses of EFA funds:

- Security or rental deposits for housing
- Mortgage payments
- Pre-Exposure Prophylaxis (PrEP)
- Storage of a client's possessions
- Medications or medical treatments not approved by the Federal Drug Administration
- Alcohol

EFA funds provided due to the public health emergency cannot be used for staff salaries. These funds should be used to provide needed supplies and assistance to clients and to cover any operational costs of providing those supplies (such as mileage). Subrecipient organizations can claim 10% of EFA funds provided due to the public health emergency for administrative costs.

Subrecipient Requirements

1. General Provisions

Subrecipient organizations are expected:

- To use their discretion in balancing the best interest of the client and the limited nature of Ryan White funding.
- To develop procedures to prevent mismanagement of these funds.
- To thoroughly document uses of EFA funding.

2. Documentation

EFA funds must be tracked and reported to the Wisconsin HIV Program by category of assistance (for example, utility bills, rent payments, medication costs). EFA must be tracked as a separate service category and reported as a separate service category on the RSR.

Subrecipient organizations must maintain receipts and evidence of payments made using EFA funds to verify that no direct cash payment was provided to the client.

Within 90 days after the public health emergency in Wisconsin is lifted, subrecipients must provide the following information to the Wisconsin HIV Program for EFA expenditures during the public health emergency:

- Total number of clients who receive each category of EFA, where “category” means one of the seven cost categories described previously.
- Total amount expended for each category of EFA for the duration of the public health emergency.
- Methods used to provide EFA (e.g., payments to agencies, vouchers).

Subrecipients who receive EFA funding as part of their usual Ryan White base grant are asked to track services provided with this funding separately to the extent possible. The Wisconsin HIV Program recognizes that this may not be possible. This could be accomplished by choosing to use the “new” EFA funds first until these are expended or the public health emergency ends.

3. Ensuring Allowable Use of Funds

Subrecipient organizations must train staff on what costs are allowable under EFA and have sufficient oversight to ensure EFA is not used for purposes not allowed under the service category.

4. Preventing Duplication

Linkage to Care Specialists and Peer Navigators, who see clients who receive medical care at many locations, are asked to refer clients to their medical provider for EFA if the client’s medical provider is one of the following Ryan White subrecipients:

- Medical College of Wisconsin
- Milwaukee Health Services, Inc.
- Primary Care Support Network at Medical College of Wisconsin
- Sixteenth Street Community Health Centers
- UW Hospitals and Clinics HIV Clinic
- Vivent Health