

AUSTIN TRANSITIONAL GRANT AREA (TGA)

HIV PLANNING COUNCIL REALLOCATIONS POLICY

Adopted August 24, 2020

Reallocation Policy Overview

Making decisions on what service categories are to be funded by Part A/MAI funds is a core responsibility of the HIV Planning Council during its annual Priority Setting & Resource Allocation (PSRA) process. This process is completed in advance of the submission of the annual grant application, eight to nine months before a Notice of Award (NoA) is issued by [the Health Resources and Services Administration \(HRSA\)](#). When the actual NoA is received by the Grantee, the Administrative Agent allocates funds in proportion to the Service Category Allocation Plan approved by the Planning Council. (In other words, if 8.2% of the Part A direct services funding request was allocated to mental health services, 8.2% of actual awarded Part A direct services funds are allocated to Mental Health Services.) Reallocation recommendations do not affect or preempt the PSRA process; reallocation only occurs after a grant award, based on the results of the PSRA process has been made and the grant period has started.

It is imperative that as much as possible of the Part A/MAI grant award be spent during the grant year. This has the dual effect of providing as many services as possible during the grant year as well as reducing the possibility that unspent funding will create a mistaken impression that the full amount of the grant award is not needed by the TGA.

Reallocation is defined as an adjustment of the Planning Council's current Service Category Allocation Plan. Ongoing evaluation of subrecipient performance and other factors determine areas in which expenditures and/or service utilization is likely to exceed or fall below awards and service goals, as well as identified areas of unmet need not known or realized at the time the current Service Category Allocation Plan was adopted.

The City of Austin's contracting process is long and complex, which makes timely shifts in funding between service categories and/or subrecipient contracts challenging. The purpose of this policy is to define the Planning Council's reallocations process and, when necessary and possible, reduce the amount of time between a conclusion by the Administrative Agent that a funding reallocation recommendation is advisable/necessary and the redeployment of funds to service categories and subrecipient contracts in which the funding can be spent within the grant year.

By adopting this Reallocations Policy, the Planning Council specifies procedures to be followed and certain authorizations that are granted to the Finance/Allocations Committee and the Administrative Agent.

Reallocation Factors

The Planning Council holds the authority to approve reallocations policies and procedures, as well as reallocations themselves. The following factors guide all reallocations:

1. Consideration of service category and other prioritization by the HIV Planning Council ([Minority AIDS Initiative A](#) or [Early Identification of Individuals with HIV/AIDS](#) populations or other priorities addressed through Directives or Letters of Support) or other factors within the application for the grant year.
2. Determination of needs that did not exist or that have increased/decreased since the Service Category Allocation Plan was adopted.
3. Cost-effectiveness of service categories (for example, the cost benefit of paying for Health Insurance and Cost Sharing Assistance where payment of premiums provides a third-party payor for medical services rather than such services being funded directly by Ryan White funds).
4. The ability of subrecipients to spend funds in their contract or in a service category relative to the portion of the grant year remaining when an anticipated contract amendment can be completed.
5. Effect on Care Continuum outcomes.

The reallocation process is based on the date a recommendation is first proposed by the Administrative Agent. Regardless of the process followed, the HIV Planning Council will be informed of all reallocations that occur, even when notifications of last-minute Rapid Reallocation must come after the end of the grant year.

Reallocation Processes

Period 1	Period 2	Period 3
<u>March 1 -August 31</u>	<u>September 1 -October 31</u>	<u>November 1 -February 28/29</u>
Full Reallocation Process	Expedited Reallocation Process	Rapid Reallocation Process
The Administrative Agent recommends reallocations between service categories to the Finance/Allocations Committee using a standard Reallocation Recommendation Form. Recommendations are placed on the next Finance/Allocations Committee and Business Meeting agendas for consideration and approval. The Administrative Agent moves funds from/to the new service categories and executes contract amendments as necessary after approval.	The Administrative Agent recommends reallocations between service categories to the Finance/Allocations Committee Chair using a standard Reallocation Recommendation Form. The committee Chair request that PC Staff facilitate consultation, due to walking quorum, with the PC Chair and members of the Finance & Allocations Committee to seek consensus on the recommendation. A response is provided to the Administrative Agent within ten business days. If consensus cannot be achieved, the Finance/Allocations Chair requests that the Administrative Agent submit a substitute recommendation that addresses any identified concerns. If/when approved, the Finance/Allocations and PC Chairs sign the recommendation form. The Administrative Agent moves funds from/to the new service categories and executes contract amendments as necessary. The reallocation is reported to the full Council at the next regularly scheduled Business Meeting.	The Administrative Agent determines that reallocations are needed between service categories in order to more fully expend grant funds or meet an unanticipated need. Without preapproval, the Administrative Agent may reallocate up to 10% of the total direct services grant award between service categories without advance approval. Rapid Reallocations made by the Administrative Agent are reported to the Finance/Allocations Committee Chair at the time the reallocation is made and to the full Council at the next regularly scheduled Business Meeting using an Administrative/Rapid Reallocation Report Form.
<p>The Administrative Agent is authorized to reallocate Administration or Quality Management funding to currently funded service categories without Planning Council approval at any time during the year based upon reallocation factors. Administration or Quality Management reallocations made by the Administrative Agent are reported to the Finance/Allocations Committee Chair at the time the reallocation is made and to the full Council at the next scheduled Business Meeting using an Administrative/Rapid Reallocation Report Form.</p> <p>Only the Planning Council may approve a move of funding to a Service Category that was not funded as part of the Service Category Allocation Plan in the grant application. Funding a previously unfunded Service Category is not within the prerogative of the Administrative Agent at any time without prior Planning Council approval.</p>		
Per HRSA regulations, no more than a cumulative 25% of direct service funds may be reallocated between service categories at any point during the grant year.		