

POLICY The Poverello Center, Inc. currently does not generate program income from Ryan White Part A or Ending the HIV Epidemic (EHE) funds. Should program income ever be generated from federally supported activities, it will be used to reduce (offset) federal award expenditures before additional federal funds are requested, in full compliance with 2 CFR §200.307 and HRSA Policy Clarification Notice 15-03.

PROCEDURE

I. Identification and Tracking

A. Program income is defined as gross income earned by the agency that is directly generated by a federally supported activity or earned because of the federal award during the period of performance (examples: client fees, insurance rebates, or revenue from services supported by RWHAP).

B. The Finance Department will review all revenue streams at least annually (and whenever a new contract is signed) to determine if any income meets the definition of program income.

C. Any identified program income will be coded in QuickBooks using the appropriate Class (Ryan White Part A or EHE) and Customer:Job/Project and tracked in a Program Income Log maintained by the Fiscal Department.

II. Use of Program Income

A. Program income must be deducted from total allowable costs when requesting reimbursement or drawdowns from the Payment Management System (deduction/offset method).

B. Program income may only be used for allowable costs under the Ryan White award and must be fully expended before additional federal funds are drawn.

C. Poverello will continue to serve as payer of last resort; no client fees or cost-sharing will be imposed and that would violate this requirement.

III. Reporting

A. All program income (including \$0 when none is generated) will be accurately reported in the annual Ryan White Services Report (RSR), the FFR (SF-425), and any other required HRSA submissions.

B. Documentation supporting program income calculations and offsets will be retained for at least three years after grant closeout.

IV. Review This policy will be reviewed annually or as HRSA issues new program income guidance.

Approvals

Signature: _____ Date: _____ Thomas S. Pietrogallo,
MS/LCSW/MBA Chief Executive Officer

BOD Approved Date: Pending Review; Date Established: 08/15/2024; Date Revised: 11/28/2025