

# Draft Health Center Program Compliance Manual

August 2016

**Bureau of Primary Health Care (BPHC)  
Health Resources and Services Administration (HRSA)**



# Overview



The Health Center Program (HCP) Compliance Manual will be a consolidated program policy resource that:

- Outlines many of the statutory and regulatory requirements for the HCP;
- Provides guidance on how health centers can demonstrate compliance with these requirements; and
- Guides HRSA oversight of health centers.

# Eligible Health Centers

The Compliance Manual will apply to all Health Center Program awardees, look-alikes, and sub-recipients.

## All Health Centers

|   |   |
|---|---|
| Community Health Centers                                    | ✓ |
| Healthcare for the Homeless                                 | ✓ |
| Migrant Health Centers (including migrant voucher programs) | ✓ |
| Public Housing Primary Care                                 | ✓ |
| Public Agencies   | ✓ |

# Authority

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ONCE FINALIZED, the Compliance Manual will supersede previous HCP policy issuances (such as PINs and PALs) related to compliance and eligibility.

The *Introduction* section contains a list of impacted policy issuances. *Appendix A* contains a list of non-impacted policy issuances.



# Compliance Manual Structure

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- Introduction
- Chapters 1-21
- Appendix
- Glossary



# Chapters 1 and 2: Health Center Program (HCP) Eligibility and Oversight

## Chapter 1 and 2 Topics:

- **Eligibility Requirements** – How to demonstrate non-profit or public agency status and satisfy additional eligibility requirements for look-alikes.
- **Oversight** – HRSA's process for assessing HCP compliance, including when and how HRSA may take enforcement actions.

# Chapters 3-21: HCP Requirements

Chapters 3-21 address HCP compliance and are structured using four sections:

- **Authority** – Lists applicable statutory and regulatory citations for the chapter.
- **Requirements** – Identifies statutory and regulatory requirements.
- **Demonstrating Compliance** – Describes how health centers would demonstrate their compliance with requirements by fulfilling all elements in this section.
- **Related Considerations** – Provides examples of areas where health centers have discretion and gives useful information for health centers to consider when implementing a requirement.

# Chapter 21: Federal Tort Claims Act (FTCA) Deeming Requirements

FTCA will utilize the same HCP criteria for demonstrating compliance with Quality Improvement (QI)/Quality Assurance (QA) and Credentialing and Privileging.



Outlines the additional unique FTCA requirements for Risk Management and Claims Management.

# Comment Period

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The Compliance Manual is currently in DRAFT form and is open for public review and comments.

The comment period will be open for 90 calendar days.

The Compliance Manual is posted on the HCP Compliance Manual webpage for public review:

<http://bphc.hrsa.gov/programrequirements/draftcompliancemanual/index.html>



# Comment Process and Instructions

Please use the new online form to submit your comments.  
The form categorizes comments by chapter and section.

To access the form:

Go to the HCP  
Compliance Manual  
webpage

<http://bphc.hrsa.gov/program/requirements/draftcompliance/manual/index.html>



Click on the  
“Submit Feedback”  
section found on the  
right side of each  
chapter

# Feedback and Questions

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HRSA will not respond to each individual comment, but all comments are read, analyzed and considered.

HRSA will post a summary of the comments received and responses when the final version of the Compliance Manual is released.

For additional information and/or technical assistance regarding use of the online Feedback/Comment Submission form, please contact:  
[HCPComplianceManual@hrsa.gov](mailto:HCPComplianceManual@hrsa.gov)

