



PROGRAM ASSISTANCE LETTER

DATE: November 14, 2014

DOCUMENT NUMBER: 2014-11

DOCUMENT TITLE: Applicability of PAL 2014-08: Health Center Program Requirements Oversight to Look-Alikes

TO: Health Center Program Look-Alikes
Primary Care Associations
Primary Care Organizations
National Cooperative Agreements

I. Purpose

The purpose of this Program Assistance Letter (PAL) is to clarify that the Progressive Action process and associated enforcement actions described in PAL 2014-08: Health Center Program Requirements Oversight¹ issued on June 11, 2014 also apply to organizations designated by HRSA as Health Center Program look-alikes, as defined in section 1861(aa)(4)(B) and section 1905(l)(2)(B) of the Social Security Act. PAL 2014-08 provides policy clarification and updated program guidance regarding the Health Resources and Services Administration (HRSA), Bureau of Primary Health Care (BPHC) Progressive Action process.

II. Applicability

This PAL applies to all organizations designated as look-alikes under HRSA's Health Center Program. Health Center Program look-alikes must comply with all applicable statutory, regulatory, and other policy requirements (including those stated in assurances, applications, or Notices of Look-Alike Designation (NLD)) and it is HRSA's goal to ensure oversight of compliance with these requirements through consistent application of the progressive action process.

III. Progressive Action Process for Look-Alikes

The Progressive Action process described in PAL 2014-08 was developed to support the review and oversight of Health Center Program requirements² and assist health centers in their efforts to

¹ PAL 2014-08: Health Center Program Requirements Oversight is available at <http://bphc.hrsa.gov/policiesregulations/policies/pal201408.html>.

² Health Center Program requirements are available at <http://bphc.hrsa.gov/about/requirements>.

achieve Health Center Program objectives. The following clarifications and/or exceptions to the process described in PAL 2014-08 apply to look-alikes:

- Until further enhancements to the EHB module are made, look-alikes will be notified of Progressive Action conditions and condition response deadlines via an Electronic Handbook (EHB) email and will submit their responses to these conditions via email, which HRSA will manually upload to the appropriate folder in EHB. Once EHB enhancements are completed, look-alikes will be notified of Progressive Action conditions and condition response deadlines via a Notice of Look-Alike Designation (NLD), and responses to such conditions will be submitted via EHB.
- HRSA will notify look-alikes by EHB email as to whether their response adequately addresses the area of non-compliance of each Progressive Action condition and whether further action is needed.
- HRSA will determine look-alike non-compliance with Health Center Program requirements primarily via review of a look-alike application or an Operational Site Visit and through other means as described in PAL 2014-08.
- HRSA may terminate the designation period before the current designation period ends or may not award the look-alike designation if a look-alike materially fails to comply with Health Center Program requirements as specified in the terms and conditions of designation.
- HRSA will not renew the organization's look-alike designation if a look-alike organization receives two consecutive one-year designation periods and the review of the Renewal of Designation (RD) would result in a third consecutive one-year designation period. Designation period length criteria will be outlined in the RD guidance.
- Organizations, including those for which HRSA has terminated their designation period or has not renewed a look-alike designation, may re-apply for look-alike designation through the initial designation application process at any time.

IV. Effective Date

The Progressive Action process for look-alike conditions will become effective on the date of issuance of this PAL. As such, HRSA will apply new and existing look-alike conditions using the Progressive Action process, beginning with the initial 90-day condition phase.

V. Contact Information

If you have questions about this PAL, please contact BPHC at lookalike@hrsa.gov.