ELIGIBILITY REQUIREMENTS FOR LOOK-ALIKE INITIAL DESIGNATION APPLICANTS

**Primary Reviewer:** Governance/Administrative Expert  
**Secondary Reviewer:** N/A

*Authority:* Sections 1861(aa)(4)(b) and 1905(l)(2)(B) of the Social Security Act.
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Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Most recent Audit or Audited Financial Statements
☐ Health center organization chart(s) with names of key management staff
☐ Corporate organization chart(s) (only applicable for public agencies or for organizations with a parent or subsidiary)
☐ Agreements with parent corporation, affiliate, subsidiary or any other controlling organization, if applicable

Documents Provided at the Start of the Site Visit:

☐ Health center selection of three to five health center patient records (e.g., using live navigation of the EHR, screenshots from the EHR, or actual records if the records are not electronic/EHR records) that document the provision of various Required and Additional Services
☐ Sample of up to three Medicare or Medicaid claims or other billing documents that demonstrate under what organizational entity or unit billing is conducted
☐ Contracts for substantive programmatic work
☐ PD/CEO employment contract or related agreement (for the purposes of provisions regarding CEO selection, evaluation, and dismissal or termination)

SUMMARY OF FINDINGS

Site Visit Team Methodology

- Confirm that applicant is currently delivering primary care services through tour of service delivery sites (one or more sites as listed on Form 5B); and
- Review selection of three to five health center patient records (either using live navigation of the EHR, screenshots from EHR, actual records if the records are not electronic/EHR records) that document the provision of various primary care services.

1 For the purposes of the Health Center Program, contracting for substantive programmatic work applies to contracting for the: Project Director/CEO; entire key management team; majority of health care providers with a single entity. Substantive programmatic work does not include the acquisition of supplies, material, equipment, or general support services.
Site Visit Findings

1. Is the applicant currently delivering primary health care services to patients within the proposed service area?
   □ YES □ NO

   If No, an explanation is required:

Site Visit Team Methodology

- Interview CFO/fiscal staff of the applicant organization and board members (e.g., board chair, board treasurer) regarding ownership and operation of the applicant organization.
- Review audit or financial statements of the applicant organization.
- Review Medicare or Medicaid claims or other billing documents that demonstrate under what organizational entity or unit billing is conducted.
- Review bylaws of applicant organization, and if applicable, the co-applicant agreement for public agency applicants with a co-applicant governing board.
- If applicable, review any documents related to the applicant's parent company, affiliate, subsidiary organization(s), or any other organization that has a substantial role in the operations of the applicant organization.

Site Visit Findings

2. Was the applicant (i.e., the organization applying for look-alike designation) able to document that it currently owns and controls the organization's assets and liabilities (for example, the applicant organization does not have a sole corporate member, is not a subsidiary of another organization)?
   □ YES □ NO

   If No, an explanation is required:

3. Does the applicant have safeguards in place to ensure the benefits that accrue through look-alike designation as a Federally Qualified Health Center (FQHC) (for example, FQHC payment rates, 340B Drug Pricing) will only be distributed to the Health Center Program project?
   □ YES □ NO

   If No, an explanation is required:

Site Visit Team Methodology

- Review applicant’s current organization chart(s).
- Review job descriptions or contracts for the Project Director (PD)/Chief Executive Officer (CEO) and interview PD/CEO.
- Review bylaws of applicant organization.
- If applicable, review co-applicant agreement (for public agency applicants with a co-applicant governing board).
- If applicable, review contracts for substantive programmatic\(^2\) work under the proposed health center project.

**Site Visit Findings**

4. Was the applicant (i.e., the organization applying for look-alike designation) able to document that it operates the Health Center Program project (i.e., the services and activities included in the look-alike application)?
   - YES □
   - NO □

   If No, an explanation is required:
   ________________________________________________________________

5. Does the look-alike applicant organization have a Project Director/CEO in place who carries out independent, day-to-day oversight of health center activities (i.e., the services and activities included in the look-alike application), solely on behalf of the governing board of the applicant organization?
   - YES □
   - NO □

   If No, an explanation is required:
   ________________________________________________________________

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\(^2\) For the purposes of the Health Center Program, contracting for substantive programmatic work applies to contracting for the: Project Director/CEO; entire key management team; majority of health care providers with a single entity. Substantive programmatic work does not include the acquisition of supplies, material, equipment, or general support services.