Health Center Program
Site Visit Protocol

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INTRODUCTION

Purpose

The purpose of Health Resources and Services Administration (HRSA) site visits1 is to support the effective oversight of the Health Center Program. Operational Site Visits (OSVs) provide an objective assessment and verification of the status of each Health Center Program awardee or look-alike's compliance with the statutory and regulatory requirements of the Health Center Program. In addition, HRSA conducts site visits to assess and verify look-alike initial designation applicants for compliance with Health Center Program requirements to inform initial designation determinations. For the purposes of this document, the term “health center” refers to entities that apply for or receive a federal award under section 330 of the Public Health Service (PHS) Act (including section 330 (e), (g), (h) and (i)), section 330 subrecipients, and organizations designated as look-alikes.

HRSA uses the Health Center Program Compliance Manual (the “Compliance Manual”) as the basis for determining whether health centers have demonstrated compliance with the statutory and regulatory requirements of the Health Center Program. The Health Center Program Site Visit Protocol (SVP) is the tool for assessing compliance with Health Center Program requirements during OSVs. The SVP is designed to provide HRSA the information necessary to perform its oversight responsibilities using a standard and transparent methodology that aligns with the Compliance Manual. In addition to assessing compliance with all Health Center Program requirements, the OSV also includes sections for the following:

- An analysis of one or more performance measure(s)
- Identification, as applicable, of promising practices
- A review of 340B requirements for those health centers that participate in the HRSA Office of Pharmacy Affairs 340B Drug Pricing Program.2

During the OSV, at the health center's request, consultants may choose to share recommendations or limited technical assistance on various areas of health center operations that fall outside the scope of the compliance review. Such recommendations/technical assistance information will not be included in the final site visit report.

1 The U.S. Department of Health and Human Services (HHS) Uniform Administrative Requirements (45 CFR 75.342) permit HRSA to “make site visits, as warranted by program needs.” In addition, 45 CFR 75.364 states that, “The HHS awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-federal entity which are pertinent to the federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-federal entity's personnel for the purpose of interview and discussion related to such documents.”

HRSA typically conducts OSVs during the first 10-14 months of a newly-funded/newly-designated health center’s project/designation period. After the first project/designation period, HRSA conducts OSVs at least once per project/designation period, generally around 18 months. HRSA strongly encourages all health centers to review and utilize both the Compliance Manual and the SVP to prepare for site visits and to help regularly assess and assure ongoing compliance with the Health Center Program.

Site Visit Report and Compliance Determinations

HRSA will develop and share a site visit report with the health center within 45 days after the site visit. The report will convey the site visit findings and final compliance determinations. In circumstances where HRSA has determined that a health center has failed to demonstrate compliance with one or more of the Health Center Program requirements, HRSA will place a condition(s) on the award/designation.3

The Federal Tort Claims Act (FTCA) Program will also use the site visit report to support FTCA deeming decisions, and to identify technical assistance needs for FTCA-deemed health centers.4,5 In circumstances where the site visit report contains FTCA risk and claims management findings that require follow-up, the FTCA Program will develop and share a Corrective Action Plan with the health center. The health center is expected to respond to the Corrective Action Plan and address findings before the next FTCA deeming cycle.

Health centers and look-alike initial designation applicants should use the site visit report and the Compliance Manual to understand the compliance findings and to obtain guidance for resolving non-compliance findings.6 Health centers may also contact the HRSA Health Center Program staff primary point-of-contact for additional information regarding compliance findings and submissions in response to conditions.

Site Visit Protocol Structure

Each Compliance Manual chapter that addresses Health Center Program requirements has a corresponding section in the SVP. Similar to the Compliance Manual, the SVP also contains a section on the FTCA Program risk management and claims management requirements.

3 For additional information on how HRSA pursues remedies for non-compliance, including progressive action, see Health Center Program Compliance Manual, Chapter 2: Health Center Program Oversight.
4 Unresolved Health Center Program conditions related to clinical staffing and/or quality improvement/assurance, requirements that apply to both Health Center Program and FTCA deeming, may impact FTCA deeming if they are not resolved by the time that HRSA makes annual FTCA deeming decisions.
5 Health centers that have question regarding the FTCA Program or FTCA deeming requirements may contact the FTCA Help Line: 1-877-974-2742 or http://www.hrsa.gov/about/contact/bphc.aspx
6 Look-alike initial designation applicants must be compliant with all Health Center Program requirements at the time of application and should refer to the Look-Alike Initial Designation application for further guidance on how HRSA will address findings of non-compliance at a pre-designation OSV.
The following components are contained within each SVP section that assesses whether a health center has demonstrated compliance with Health Center Program requirements:

- **Statute and Regulations**: The supporting statute and regulations for the associated program requirements.
- **Primary and Secondary Reviewers**: The member of the site visit team who will serve as the primary reviewer for that section, based on expertise (governance/administrative, fiscal, or clinical), and an optional or suggested secondary reviewer who may add expertise and assistance as needed.
- **Documents Checklist for Health Center Staff**: A list of the documents that health centers will provide to the consultant team prior to the site visit or onsite.⁷
  - In cases where a sample (e.g., sample of patient records) is referenced in the list of documents to be provided by the health center, the health center is expected to provide (or “pull”) the sample and have it ready for the site visit team at the start of the site visit.
  - When the SVP allows for a range in the sample size, the health center should take into account its size and complexity when determining sample size. If the sample size does not allow a consultant to assess the program requirement, the consultant may complete additional sampling in coordination with the health center.
- **Demonstrating Compliance Elements**: The elements from the Health Center Program Compliance Manual that describe how health centers would demonstrate their compliance with the applicable Health Center Program requirements. A small subset of elements are not assessed during a site visit because an assessment is conducted via other means by HRSA (e.g., competitive application review, look-alike renewal designation application review, HRSA’s Division of Grants Management Office (DGMO) review). The SVP clearly indicates where this is the case.
- **Site Visit Team Methodology**: The methods site visit teams will use to assess compliance with the corresponding demonstrating compliance elements. Methods include but are not limited to reviews of policies and procedures, samples of files and records, site tours, and interviews.
- **Site Visit Findings**: The site visit team’s responses to the series of questions based on the related methodologies. These findings are included in the health center’s site visit report and form the basis for determining whether a health center has demonstrated compliance with Health Center Program requirements.

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⁷ Site visit teams, including consultants, are authorized representatives of HRSA and thus may review a health center’s policies and procedures, financial or clinical records, and other relevant documents, in order to assess and verify compliance with Health Center Program and FTCA deeming requirements. Site visit teams are also subject to confidentiality standards. Consultants who violate such standards are in violation of their contract, and could be subject to Title 18, United States Code, Section 641. While it is permissible for health centers to request that HRSA staff and/or consultants sign additional confidentiality statements, this should be communicated prior to or at the beginning of the site visit to avoid any disruption or delay in the site visit process.
NEEDS ASSESSMENT

Primary Reviewer: Governance/Administrative Expert
Secondary Reviewer: Clinical Expert

Authority: Section 330(k)(2) and Section 330(k)(3)(J) of the PHS Act; and 42 CFR 51c.104(b)(2-3), 42 CFR 51c.303(k), 42 CFR 56.104(b)(2), 42 CFR 56.104(b)(4), and 42 CFR 56.303(k)

Document Checklist for Health Center Staff

Documents Provided at the Start of the Site Visit:

☐ Service area reports or analysis documentation
☐ Needs Assessment(s) or related studies or resources

Demonstrating Compliance

Element a: Service Area Identification and Annual Review

The health center identifies and annually reviews its service area\(^8\) based on where current or proposed patient populations reside as documented by the ZIP codes reported on the health center’s Form 5B: Service Sites. *In addition, these service area ZIP codes are consistent with patient origin data reported by ZIP code in its annual Uniform Data System (UDS) report (for example, the ZIP codes reported on the health center’s Form 5B: Service Sites would include the ZIP codes in which at least 75 percent of current health center patients reside, as identified in the most recent UDS report).*

*Note: HRSA assesses whether the health center has demonstrated compliance with this portion of element “a” through its internal review of the competing continuation application (Service Area Competition (SAC) or Renewal of Designation (RD)). No onsite review of this portion of element “a” related to determining the consistency of service area zip codes and patient origin data is required.

Site Visit Team Methodology

- Interview Project Director/CEO and other key management staff regarding service area analysis process.
- Review health center’s Form 5B: Service Sites.

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\(^8\) Also referred to as “catchment area” in the Health Center Program implementing regulation in 42 CFR 51c.102.
Site Visit Findings

1. Does the health center utilize patient origin data to define and review its service area (as reflected by the zip codes included in the Form 5B site entries)?
   ☐ YES ☐ NO

   If No, an explanation is required:

   _______________________________________________________________________

2. Is this service area review process completed at least annually?

   Note: The annual review of a health center’s service area may be conducted in a number of ways (for example, as part of submission of a competitive application or as a “stand-alone” activity during the year, such as review of annual UDS patient origin data or other data on where patients reside).
   ☐ YES ☐ NO

   If No, an explanation is required:

   _______________________________________________________________________

Element b: Update of Needs Assessment

The health center completes or updates a needs assessment of the current or proposed population at least once every three years,\(^9\) for the purposes of informing and improving the delivery of health center services. *The needs assessment utilizes the most recently available data\(^{10}\) for the service area and, if applicable, special populations and addresses the following:

- Factors associated with access to care and health care utilization (for example, geography, transportation, occupation, transience, unemployment, income level, educational attainment);
- The most significant causes of morbidity and mortality (for example, diabetes, cardiovascular disease, cancer, low birth weight, behavioral health) as well as any associated health disparities; and

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\(^9\) Compliance may be demonstrated based on the information included in a Service Area Competition (SAC) or a Renewal of Designation (RD) application. Note that in the case of a Notice of Funding Opportunity for a New Access Point or Expanded Services grant, HRSA may specify application-specific requirements for demonstrating an applicant has consulted with the appropriate agencies and providers consistent with Section 330(k)(2)(D) of the Public Health Service Act. Such application-specific requirements may require a completed or updated needs assessment more recent than that which was provided in an applicant’s SAC or RD application.

\(^{10}\) In cases where data are not available for the specific service area or special population, health centers may use extrapolation techniques to make valid estimates using data available for related areas and population groups. Extrapolation is the process of using data that describes one population to estimate data for a comparable population, based on one or more common differentiating demographic characteristics. Where data are not directly available and extrapolation is not feasible, health centers should use the best available data describing the area or population to be served.
• Any other unique health care needs or characteristics that impact health status or access to, or utilization of, primary care (for example, social factors, the physical environment, cultural/ethnic factors, language needs, housing status).

*Note: HRSA assesses whether the health center has demonstrated compliance with this remaining portion of element “b” through its internal review of the competing continuation application (SAC or RD), which occurs at least once every three years. Therefore, no onsite review of this portion of element “b” is required. Rather, onsite assessment focuses only on how the health center utilizes the results of its needs assessment for the purposes of informing and improving delivery of health center services.

Site Visit Team Methodology

- Review documentation (e.g., studies, resources, reports) used to develop the need-related information included in the health center’s most recent SAC/RD or New Access Point (NAP)/Initial Designation (ID) application in order to inform the interview regarding the utilization of needs assessment data.
- Interview Project Director/CEO and other key management staff regarding utilization of needs assessment(s).

Site Visit Findings

3. Was the health center able to provide at least one example of how it utilized the results of its needs assessment(s) to inform and improve the delivery of health center services?

Note: If the health center is part of a larger organization (for example, a health department, mental health or social service agency), consider whether the needs assessment(s) provide data that are relevant and specific enough to inform the delivery of health center services.

☐ YES ☐ NO

If No, an explanation is required:
REQUIRED AND ADDITIONAL HEALTH SERVICES

Primary Reviewer: Clinical Expert
Secondary Reviewer: N/A

Authority: Section 330(a)-(b), Section 330(h)(2), and Section 330(k)(3)(K) of the PHS Act; and 42 CFR 51c.102(h) and (j), 42 CFR 56.102(l) and (o), and 42 CFR 51c.303(l)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

- For health centers with Column III services, operating procedures for tracking and managing referred services (as applicable for health centers that do not manage referrals electronically)

Documents Provided at the Start of the Site Visit:

- For services in Column I of the health center’s current Form 5A:
  - Provide a schedule and plan to tour at least one to two health center sites where the majority of services are provided directly by the health center
  - If a service(s) cannot be observed during the site tours, provide documentation of service(s) provision in a current patient record
- For services in Column II of the health center’s current Form 5A (if applicable):
  - Sample of up to three written contracts/agreements for EACH Required and EACH Additional service provided via Column II but NOT provided via Column I
  - One written contract/agreement for EACH Required and EACH Additional service provided via Column I AND Column II
  - Health center selection of three to five health center patient records (e.g., using live navigation of the Electronic Health Records (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 provided ONLY via formal written contracts/agreements
- For services in Column III of the health center’s current Form 5A (if applicable):
  - Sample of up to three written referral arrangements for EACH Required and EACH Additional service provided via Column III but NOT provided via Column I
  - One written referral arrangement for EACH Required and EACH Additional service provided via Column I AND Column III
  - Log or list of patients referred for one or more Required service(s) in the past 12-24 months and, if time permits, a list of patients referred for one or more Additional service(s) (provided ONLY via Form 5A, Column III) in the past 12-24 months. Using log/list(s), the clinical expert will select three to five records to review and the health center will provide these as 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) to assess the referral process. **Note:** This excludes follow-up from hospital admissions or hospital visits that will be reviewed in Continuity of Care and Hospital Admitting

☐ Sample of key health center documents (for example, materials/application used to assess eligibility for the health center’s sliding fee discount program, intake forms for clinical services, instructions for accessing after-hours services) translated for patients with limited English proficiency

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**Demonstrating Compliance**

**Element a: Providing and Documenting Services within Scope of Project**

The health center provides access to all services included in its HRSA-approved scope of project\(^\text{11}\) (Form 5A: Services Provided) through one or more service delivery methods,\(^\text{12}\) as described below:\(^\text{13}\)

- **Direct:** If a required or additional service is provided directly by health center employees\(^\text{14}\) or volunteers, this service is accurately recorded in Column I on Form 5A: Services Provided, reflecting that the health center pays for and bills for direct care.

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\(^{11}\) In accordance with 45 CFR 75.308 (Uniform Administrative Requirements: Revision of Budget and Program Plans), health centers must request prior approval from HRSA for a change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval). This prior approval requirement applies, among other things, to the addition or deletion of a service within the scope of project. These changes require prior approval from HRSA and must be submitted by the health center as a formal change in scope request. See [http://www.bphc.hrsa.gov/programrequirements/scope.html](http://www.bphc.hrsa.gov/programrequirements/scope.html) for further details on scope of project, including descriptions of the services listed on Form 5A: Services Provided available at: [https://www.bphc.hrsa.gov/programrequirements/scope/form5aservicedescriptors.pdf](https://www.bphc.hrsa.gov/programrequirements/scope/form5aservicedescriptors.pdf).

\(^{12}\) The Health Center Program statute states that health centers may provide services “either through the staff and supporting resources of the center or through contracts or cooperative arrangements.” (42 U.S.C. 254b(a)(1)) The Health Center Program Compliance Manual utilizes the terms “Formal Written Contract/Agreement” and “Formal Written Referral Arrangement” to refer to such “contracts or cooperative arrangements.” For more information on documenting service delivery methods within the HRSA-approved scope of project on Form 5A: Services Provided, see: [http://bphc.hrsa.gov/programrequirements/scope/form5acolumnndescriptors.pdf](http://bphc.hrsa.gov/programrequirements/scope/form5acolumnndescriptors.pdf).

Other Health Center Program requirements apply when providing services through contractual agreements and formal referral arrangements. Such requirements are addressed in other chapters of the Manual where applicable.

\(^{13}\) See the Health Center Program Compliance Manual, Chapter 9: Sliding Fee Discount Program for more information on sliding fee discount program requirements and how they apply to the various service delivery methods.

\(^{14}\) For purposes of the HRSA-approved scope of project (Form 5A: Services Provided), HRSA/BPHC utilizes Internal Revenue Service (IRS) definitions to differentiate contractors and employees. Typically, an employee receives a salary on a regular basis and a W-2 from the health center with applicable taxes and benefit contributions withheld.
• **Formal Written Contract/Agreement.** If a required or additional service is provided on behalf of the health center via a formal contract/agreement between the health center and a third party (including a subrecipient), this service is accurately recorded in Column II on Form 5A: Services Provided, reflecting that the health center pays for the care provided by the third party via the agreement. In addition, the health center ensures that such contractual agreements for services include:
  ◦ How the service will be documented in the patient’s health center record; and
  ◦ How the health center will pay for the service.

• **Formal Written Referral Arrangement:** If access to a required or additional service is provided and billed for by a third party with which the health center has a formal referral arrangement, this service is accurately recorded in Column III on Form 5A: Services Provided, reflecting that the health center is responsible for the act of referral for health center patients and any follow-up care for these patients provided by the health center subsequent to the referral. In addition, the health center ensures that such formal referral arrangements for services, at a minimum, address:
  ◦ The manner by which referrals will be made and managed; and
  ◦ The process for tracking and referring patients back to the health center for appropriate follow-up care (for example, exchange of patient record information, receipt of lab results).

**Site Visit Team Methodology**

- Interview CMO and/or other clinical staff responsible for service delivery, including contracted or referred services.
- Interview health center clinical leadership and providers regarding patient language needs (e.g., most common primary languages spoken by the patient population) and the role of cultural competency in the delivery of health center services (e.g., training of front desk and clinical staff in cultural knowledge, attitudes, and beliefs of patient population).
- Review health center’s Form 5A: Services Provided.

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15 See the Health Center Program Compliance Manual, Chapter 12: Contracts and Subawards for more information on program requirements around contracting.

16 For purposes of the HRSA-approved scope of project (Form 5A: Services Provided), services provided via “contract/formal agreement” are those provided by practitioners who are not employed by or volunteers of the health center (for example, an individual provider with whom the health center has a contract; a group practice with which the health center has a contract; a locum tenens staffing agency with which the health center contracts; a subrecipient organization). Typically, a health center will issue an Internal Revenue Service (IRS) Form 1099 to report payments to an individual contractor. Please see the Federal Tort Claims Act (FTCA) Health Center Policy Manual for information about eligibility for FTCA coverage for covered activities by covered individuals, which extends liability protections for eligible “covered individuals,” including governing board members and officers, employees, and qualified individual contractors.

17 For purposes of the HRSA-approved scope of project (Form 5A: Services Provided), access to services provided via “formal referral arrangements” are those referred by the health center but provided and billed for by a third party. Although the service itself is not included within the HRSA-approved scope of project, the act of referral and any follow-up care provided by the health center subsequent to the referral are considered to be part of the health center’s HRSA-approved scope of project. For more information on documenting service delivery methods within the HRSA-approved scope of project on Form 5A: Services Provided, see: [http://bphc.hrsa.gov/programrequirements/scope/form5acolumnndescriptors.pdf](http://bphc.hrsa.gov/programrequirements/scope/form5acolumnndescriptors.pdf).
- Review services in Column I of the health center’s current Form 5A:
  ◦ Based on the Required and Additional services listed in Column I of the health center’s Form 5A, confirm via a tour of one or more health center sites that all such services are currently being provided by the health center directly OR if certain services cannot be observed at various sites due to time/distance constraints, confirm delivery of the service via documentation in a current patient record.
- Review services in Column II of the health center’s current Form 5A (if applicable):
  ◦ Sample of up to three written contracts/agreements for EACH Required and EACH Additional service provided via Column II but NOT provided via Column I.
  ◦ One written contract/agreement for EACH Required and EACH Additional service provided via Column I AND Column II.
  ◦ 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 provided ONLY via formal written contracts/agreements (Form 5A, Column II).
- Review services in Column III of the health center’s current Form 5A (if applicable):
  ◦ Log or list of patients referred for one or more Required service(s) in the past 12-24 months and, if time permits, a list of patients referred for one or more Additional service(s) (provided ONLY via Form 5A, Column III) in the past 12-24 months. Using log/list(s), the clinical expert will select three to five records to review and the health center will provide these as 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) to assess the referral process. Note: This excludes follow-up from hospital admissions or hospital visits that will be reviewed in Continuity of Care and Hospital Admitting.

Note: Please devote no more than 2 hours to assessing accuracy of scope of project as documented on Form 5A. The primary focus of this portion of the site visit is on validating the actual provision of the various required and additional services. When reviewing the provision of enabling services provided via Column II or III (e.g., transportation, translation, outreach), it is acceptable that the related “formal written” contracts or referral arrangements may not contain the level of detail that would need to be demonstrated for clinical services provided via contracts or referral arrangements.

Site Visit Findings

In responding to the questions below, please note:

Any findings regarding the structure or availability of a health center’s SLIDING FEE DISCOUNT PROGRAM as it relates to the SERVICES listed on Form 5A (e.g., health center is providing an additional service directly, but the service is NOT discounted through the health center’s sliding fee discount program) will be assessed and documented under the Sliding Fee Discount Program section.
1. **Form 5A, Column I:**

   - Are all services listed in Column I on the health center’s current Form 5A being provided by the health center directly?
     - YES ☐  NO ☐  NOT APPLICABLE ☐

   **Note:** Select “Not Applicable” if the health center does not offer any services via Column I.

   If No, an explanation is required, including specifying any missing services:

   ______________________________________________________________________

2. **Form 5A, Column II:**

   - Does the health center maintain formal written contracts/agreements for services listed in Column II on its current Form 5A?
     - YES ☐  NO ☐  NOT APPLICABLE ☐

   - Do these contracts/agreements document how the health center will pay for the service(s) and how the service will be documented in the patient’s health center record?
     - YES ☐  NO ☐  NOT APPLICABLE ☐

   - Was the health center able to produce patient records from the past 12-24 months that document receipt of specific contracted services?
     - YES ☐  NO ☐  NOT APPLICABLE ☐

   **Note:** Select “Not Applicable” for each of the above questions if the health center does not offer any services via Column II.

   If No was selected for any of the above, an explanation is required:

   ______________________________________________________________________

3. **Form 5A, Column III:**

   - Does the health center maintain formal written referral arrangements for services listed in Column III on its current Form 5A?
     - YES ☐  NO ☐  NOT APPLICABLE ☐

   - Does the health center have a process for making, tracking and managing referrals for these services with the referral provider(s) (e.g., process for tracking whether patient presented at the referral provider or the outcomes of the referral visit)?
     - YES ☐  NO ☐  NOT APPLICABLE ☐

   - Is there documentation in the patient record of appropriate follow-up care and information that resulted from these referrals (e.g., exchange of patient record information, receipt of lab results)?
     - YES ☐  NO ☐  NOT APPLICABLE ☐

   **Note:** Select “Not Applicable” for each of the above questions if the health center does not offer any services via Column III.
4. Considering the overall scope of project (i.e., all services on Form 5A across the various Columns), were services recorded on Form 5A consistent with how they were offered by the health center at the time of the site visit?
   ☐ YES    ☐ NO
   If No, an explanation is required, including specifying any discrepancies observed:

Element b: Ensuring Access for Limited English Proficient Patients

Health center patients with limited English proficiency are provided with interpretation and translation (for example, through bilingual providers, on-site interpreters, high quality video or telephone remote interpreting services) that enable them to have reasonable access to health center services.

Site Visit Team Methodology

- Review UDS patient demographic data.
- Review sample of translated health center documents.
- Review access to interpretation services (e.g., on-site interpreter(s), contract(s) for interpretation services).
- Interview health center clinical leadership and providers regarding patient language needs (e.g., most common primary languages spoken by the patient population) and the role of cultural competency in the delivery of health center services (e.g., training of front desk and clinical staff in cultural knowledge, attitudes, and beliefs of patient population).

Site Visit Findings

5. Does the health center provide access to interpretation for health center patients with limited English proficiency?
   ☐ YES    ☐ NO
   If No, an explanation is required:

6. Was the health center able to provide an example of a key document (i.e., documents that enable patients to access health center services) translated into different languages for its patient population?
   ☐ YES    ☐ NO
   If No, an explanation is required:
Element c: Providing Culturally Appropriate Care

The health center makes arrangements and/or provides resources (for example, training) that enable its staff to deliver services in a manner that is culturally sensitive and bridges linguistic and cultural differences.

Site Visit Team Methodology

- Review UDS patient demographic data.
- Review sample of translated health center documents.
- Review access to interpretation services (e.g., on-site interpreter(s), contract(s) for interpretation services).
- Interview health center clinical leadership and providers regarding patient language needs (e.g., most common primary languages spoken by the patient population) and the role of cultural competency in the delivery of health center services (e.g., training of front desk and clinical staff in cultural knowledge, attitudes, and beliefs of patient population).

Site Visit Findings

7. Was the health center able to provide an example of how it delivers services in a manner that is culturally appropriate for its patient population (e.g., culturally appropriate health promotion tools)?
   □ YES    □ NO

If No, an explanation is required:

______________________________________________________________________
CLINICAL STAFFING

Primary Reviewer: Clinical Expert  
Secondary Reviewer: Governance/Administrative Expert (as needed)

Authority: Sections 330(a)(1), (b)(1)-(2), and (k)(3)(I)(ii)(II)-(III) of the PHS Act; and 42 CFR 51c.303(a), 42 CFR 51c.303(p), 42 CFR 56.303(a), and 42 CFR 56.303(p)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Credentialing and privileging procedures (including Human Resource procedures, if applicable)
☐ Website URL (if applicable)
☐ Current staffing profile (name, position, FTE, hire date). Indicate staff with interpretation/translation capabilities (i.e., bilingual, multilingual)

Documents Provided at the Start of the Site Visit:

☐ Needs Assessment(s) or related studies or resources
☐ Provider contracts, agreements and subrecipient arrangements (if applicable, based on service delivery methods indicated on Form 5A)
☐ Sample of files that contain credentialing and privileging information: four to five licensed independent practitioners (LIP) files; four to five other licensed or certified practitioners (OLCPs) files; and, only if applicable, two to three files for other clinical staff. The selected files should include:
   ◦ Representation from different disciplines and sites
   ◦ Directly employed and contracted providers in addition to volunteers (if applicable)
   ◦ Providers who do procedures beyond core privileges for their discipline(s)
   ◦ Newest provider (to assess timeliness of process and whether clinician was credentialed and privileged prior to delivering patient care)
   ◦ Re-credentialed/re-privileged provider
☐ Contract or agreement with Credentialing Verification Organization (CVO) or other entity used to perform credentialing functions (such as primary source verification) on behalf of the health center (if applicable)
☐ Recruitment and retention plan or related documents for clinical staff
**Element a: Staffing to Provide Scope of Services**

The health center ensures that it has clinical staff\(^{18}\) and/or has contracts or formal referral arrangements in place with other providers or provider organizations to carry out all required and additional services included in the HRSA-approved scope of project.\(^{19}\)

**Site Visit Team Methodology**

- Interview CMO/Clinical Director and/or equivalent leadership (e.g., Dental Director, Pharmacist).
- Tour at least one to two health center site(s) where the majority of required services are delivered.
- Review current staffing profile.
- Review health center’s Form 5A for background and alignment of services with staffing, including those services provided via contracts or referral arrangements.

**Site Visit Findings**

1. Does the health center’s current clinical staffing makeup (employees, volunteers) — including, if applicable, contracted or referral providers — enable it to carry out the approved scope of project (i.e., the list of Required and Additional services on Form 5A)\(^{19}\)?
   - [ ] YES
   - [ ] NO

   If No, an explanation is required specifying what staffing is lacking and for which services:
   

**Element b: Staffing to Ensure Reasonable Patient Access**

The health center has considered the size, demographics, and health needs (for example, large number of children served, high prevalence of diabetes) of its patient population in determining the number and mix of clinical staff necessary to ensure reasonable patient access to health center services.

**Site Visit Team Methodology**

\(^{18}\) Clinical staff includes licensed independent practitioners (for example, Physician, Dentist, Physician Assistant, Nurse Practitioner), other licensed or certified practitioners (for example, Registered Nurse, Licensed Practical Nurse, Registered Dietitian, Certified Medical Assistant), and other clinical staff providing services on behalf of the health center (for example, Medical Assistants or Community Health Workers in states, territories or jurisdictions that do not require licensure or certification).

\(^{19}\) Health centers seeking coverage for themselves and their providers under the Health Center Federal Tort Claims Act (FTCA) Medical Malpractice Program should review the statutory and policy requirements for coverage, as discussed in the [FTCA Health Center Policy Manual](https://www.hrsa.gov/health-center-health-care-organisations/health-center-federal-tort-claims-act-ftca-health-center-policy-manual).
- Interview CMO/Clinical Director and/or equivalent leadership (e.g., Dental Director, Pharmacist).
- Review health center’s needs assessment documentation and Uniform Data System (UDS) Summary report (number of patients served annually, patient demographics, primary diagnosis and clinical quality and outcome measures).
- Assess the type and range of services provided through review of the health center’s Form 5A and other resources as appropriate (e.g., website, health center presentation during the Entrance Conference, observation during site visit tour(s), and interviews with clinical leadership).

**Site Visit Findings**

2. Was the health center able to provide one to two examples of how the mix (e.g., pediatric and adult providers) and number (e.g., full or part time staff, use of contracted providers) of clinical staff is responsive to the size, demographics and needs of its patient population?

☐ YES  ☐ NO

If No, an explanation is required specifying why the example(s) did not show how the mix and number of clinical staff are responsive to the health center’s patient population:

______________________________________________________________________

3. Given the number of patients served annually (based on most recent UDS), is the number and mix of current staff (considering the overall scope of project—i.e., all sites and all service delivery methods) sufficient to ensure reasonable patient access to health center services?

☐ YES  ☐ NO

If No, an explanation is required:

______________________________________________________________________

**Element c: Procedures for Review of Credentials**

The health center has operating procedures for the initial and recurring review (for example, every two years) of credentials for all clinical staff members (LIPs, OLCPs, and other clinical staff providing services on behalf of the health center) who are health center employees, individual contractors, or volunteers. These credentialing procedures would ensure verification of the following, as applicable:

- Current licensure, registration, or certification using a primary source;
- Education and training for initial credentialing, using:
  - Primary sources for LIPs

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20 In states in which the licensing agency, specialty board or registry conducts primary source verification of education and training, the health center would not be required to duplicate primary source verification when completing the credentialing process.
Primary or other sources (as determined by the health center) for OLCPs and any other clinical staff

- Completion of a query through the National Practitioner Data Bank (NPDB)\textsuperscript{21}
- Clinical staff member’s identity for initial credentialing using a government-issued picture identification;
- Drug Enforcement Administration (DEA) registration; and
- Current documentation of basic life support training.

Site Visit Team Methodology

- Review the health center’s credentialing procedures (including Human Resource procedures, if applicable) for LIPs and OLCPs.
- If the health center utilizes other clinical staff (i.e., clinical staff who do not require licensure or certification to provide services on behalf of the health center), review the health center’s credentialing procedures for those other clinical staff.
- Review any contracts the health center has with CVOs (if applicable).
- Interview the individual(s) that conduct or have responsibility for the credentialing of clinical staff to determine:
  - Whether education and training for LIPs is confirmed through primary source verification obtained by the health center or whether the health center relies on the state licensing body.
  - What the health center’s method(s) is for tracking timelines for the recurring review of credentials of existing providers as well as tracking of date-sensitive credentials (such as professional licenses, DEA registration) to ensure currency.

Site Visit Findings

\textit{In responding to the questions below, please note:}

- \textit{The health center determines whether to have separate credentialing processes for LIPs versus other provider types. For example, the health center determines what specific aspects of the credentialing process (such as verification of current licensure, registration, or certification) might not apply to “other clinical staff.”}
- For OLCPs and any other clinical staff, the health center determines the sources used for verification of education and/or training.
- For LIPs, if verification is not obtained through primary source(s) by the health center, state whether the health center has confirmed that the state licensing body utilizes primary source verification of education and training for LIPs and state whether the state licensing body already has reviewed the primary source(s).

4. \textbf{Initial Credentialing Only:} Do the health center’s credentialing procedures require verification of the following for all clinical staff (LIPs, OLCPs, and other clinical staff), as applicable, upon hire:

  - Clinical staff member’s identity using a government issued picture identification?
    - ☐ YES
    - ☐ NO

\textsuperscript{21} The NPDB is an electronic information repository authorized by Congress. It contains information on medical malpractice payments and certain adverse actions related to health care practitioners, entities, providers, and suppliers. For more information, please visit \url{http://www.npdb.hrsa.gov}.
• Verification of the education and training of LIPs using a primary source?
  ☐ YES ☐ NO

• Verification of the education and/or training of OLCPs and, as applicable, other clinical staff using a primary or secondary source, as determined by the health center?
  ☐ YES ☐ NO

If No was selected for any of the above, an explanation is required:
______________________________________________________________________

5. **Initial and Recurring Credentialing Procedures**: Do the health center’s credentialing procedures require verification of the following for all clinical staff (LIPs, OLCPs, and other clinical staff), as applicable, upon hire AND on a recurring basis:

  • Verification of current licensure, registration, or certification using a primary source for LIPs and OLCPs?
    ☐ YES ☐ NO

  • Completion of a query through the NPDB for NPDB-reportable provider types?
    ☐ YES ☐ NO

  • DEA registration (as applicable)?
    ☐ YES ☐ NO

  • Current documentation of basic life support training (or comparable/advanced training, based on provider licensure or certification standards)?
    ☐ YES ☐ NO

If No was selected for any of the above, an explanation is required:
______________________________________________________________________

**Element d: Procedures for Review of Privileges**

The health center has operating procedures for the initial granting and renewal (for example, every two years) of privileges for clinical staff members (LIPs, OLCPs, and other clinical staff providing services on behalf of the health center) who are health center employees, individual contractors, or volunteers. These privileging procedures would address the following:

  • Verification of fitness for duty, immunization, and communicable disease status;
  
  • For initial privileging, verification of current clinical competence via training, education, and, as available, reference reviews;

The CDC has published recommendations and many states have their own recommendations or standards for provider immunization and communicable disease screening. For more information about CDC recommendations, see [http://www.cdc.gov/vaccines/adults/rec-vac/hcw.html](http://www.cdc.gov/vaccines/adults/rec-vac/hcw.html).
• For renewal of privileges, verification of current clinical competence via peer review or other comparable methods (for example, supervisory performance reviews); and
• Process for denying, modifying or removing privileges based on assessments of clinical competence and/or fitness for duty.

Site Visit Team Methodology

- Review the health center’s privileging procedures (including Human Resource procedures, if applicable) for LIPs, OLCPs and other clinical staff providing services on behalf of the health center to assess procedures for: verification of fitness for duty and immunization and communicable disease status; clinical competence; and modification or removal of privileges.
- Interview individual(s) or committee that completes or has approval authority for privileging of clinical staff to determine:
  ◦ How fitness for duty and immunization and communicable disease status are verified
  ◦ How clinical competence is assessed for initial granting of privileges
  ◦ How clinical competence is assessed for renewal of clinical privileges
  ◦ What the health center’s processes are for modifying or removing privileges

Site Visit Findings

**In responding to the questions below, please note:**
If a health center does not have “other clinical staff,” the health center does not have to include such staff in its operating procedures.

6. Do the health center’s operating procedures address both the initial granting and renewal of privileges for clinical staff who are health center employees, individual contractors or volunteers?

☐ YES    ☐ NO

If No, an explanation is required:
______________________________________________________________________

7. Do the health center’s privileging procedures require verification of the following for providers upon hire and on a recurring basis:

  ◦ Fitness for duty?
    ☐ YES    ☐ NO
  ◦ Immunization and communicable disease status?
    ☐ YES    ☐ NO
  ◦ Current clinical competence?
    ☐ YES    ☐ NO

If No was selected for any of the above, an explanation is required:
______________________________________________________________________
8. Does the health center have criteria and processes for modifying or removing privileges based on the outcomes of clinical competence assessments?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

Element e: Credentialing and Privileging Records

The health center maintains files or records for its clinical staff (for example, employees, individual contractors, and volunteers) that contain documentation of licensure, credentialing verification, and applicable privileges, consistent with operating procedures.

Site Visit Team Methodology

- Review sample of files that contain credentialing and privileging information: four to five LIP files; four to five OLCP files; and, only if applicable, two to three files for other clinical staff.
- If possible, conduct the review of the file sample together with the health center individual(s) responsible for maintaining credentialing and privileging documentation.

Note: Please utilize the Credentialing and Privileging File Review Resource to assist in this review and for examples of documentation methods and sources.

Site Visit Findings

9. Based on the review of the sample of provider files, did the files contain up-to-date (as defined by the health center in its operating procedures) documentation of licensure and credentialing of these clinical staff (employees, individual contractors, and volunteers)?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

10. Based on the review of the sample of provider files, did the files contain up-to-date (as defined by the health center in its operating procedures) documentation of privileging decisions (e.g., an up-to-date privileging list for each provider) for these clinical staff (employees, individual contractors, and volunteers)?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________
Element f: Credentialing and Privileging of Contracted or Referral Providers

If the health center has contracts with provider organizations (for example, group practices, locum tenens staffing agencies, training programs) or formal, written referral agreements with other provider organizations that provide services within its scope of project, the health center ensures that such providers are:

- Licensed, certified, or registered as verified through a credentialing process, in accordance with applicable federal, state, and local laws; and
- Competent and fit to perform the contracted or referred services, as assessed through a privileging process.

Site Visit Team Methodology

- If possible, conduct the review of the contract(s)/agreement(s), referral arrangement(s), or related documentation together with health center staff involved in overseeing and managing services provided via contracts and/or referral arrangements:
  - Review a total of two to three samples of contract(s)/agreement(s) or related documentation for services offered via Column II. Prioritize the review of any services that are offered only via Column II.
  - Review a total of two to three samples of formal written referral arrangement(s) or related documentation for services offered via Column III. Prioritize the review of any services that are offered only via Column III.

  **Note:** For the review of Column II and III services, you may draw from the same sample of contracts and/or referral arrangements that would be pulled for the review of Required and Additional Health Services.

Site Visit Findings

11. Was the health center able to ensure, either through provisions in the contract(s) or through other means, that contracted services (Form 5A, Column II) are provided by organizations or providers that:

  - Verify provider licensure, certification or registration through a defined credentialing process?
    - ☐ YES
    - ☐ NO
    - ☐ NOT APPLICABLE

  - Complete a privileging process relevant to the contracted service(s)?
    - ☐ YES
    - ☐ NO
    - ☐ NOT APPLICABLE

  **Notes:**
  - Select “Not Applicable” if the health center does not offer any services via Column II.

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23 This may be done, for example, through provisions in such contracts and cooperative arrangements with such organizations or health center review of such organizations’ credentialing and privileging processes.
• **In some cases for Column II services (e.g., contracts with group practices), the credentialing and privileging process for providers may be external (e.g., conducted by the group practice and not by the health center).**

If No was selected for any of the above, an explanation is required:

12. Was the health center able to ensure, either through provisions in the referral arrangement or through other means, that referred services (Form 5A, Column III) are provided by organizations that:

- Verify provider licensure, certification or registration through a defined credentialing process?
  - ☐ YES ☐ NO ☐ NOT APPLICABLE

- Complete a privileging process relevant to the referred service(s)?
  - ☐ YES ☐ NO ☐ NOT APPLICABLE

**Notes:**
- Select “Not Applicable” if the health center does not offer any services via Column III.
- **In all cases for Column III services, the credentialing and privileging process for providers is external (i.e., conducted by the referral provider/organization).**

If No was selected for any of the above, an explanation is required:
ACCESSIBLE LOCATIONS AND HOURS OF OPERATION

Primary Reviewer: Governance/Administrative Expert
Secondary Reviewer: Clinical Expert

Authority: Section 330(k)(3)(A) of the PHS Act; and 42 CFR 51c.303(a) and 42 CFR 56.303(a)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ List of health center sites, including site addresses, hours of operation by site, and information on what general services (e.g., medical, oral health, behavioral health) are offered at each service site. Note: these may be presented in separate documents or as references to health center websites

☐ Uniform Data System (UDS) Mapper Service Area Map (if updated since last application submission to HRSA/BPHC)

Documents Provided at the Start of the Site Visit:

☐ Patient satisfaction surveys or other forms of patient input

☐ Needs Assessment(s) or related studies or resources

Demonstrating Compliance

Element a: Accessible Service Sites

The health center’s service site(s) are accessible to the patient population relative to where this population lives or works (for example, at migrant camps for health centers targeting agricultural workers, in areas immediately accessible to public housing for health centers targeting public housing residents, or in shelters for health centers targeting individuals experiencing homelessness). Specifically, the health center considers the following factors to ensure the accessibility of its sites:

- Access barriers (for example, barriers resulting from the area’s physical characteristics, residential patterns, or economic and social groupings); and
- Distance and time taken for patients to travel to or between service sites in order to access the health center’s full range of in-scope services.
Site Visit Team Methodology

- Review Service Area Map.
- Review needs assessment(s) or related studies or resources.
- Review status of any special populations funding or designation.
- Interview health center staff and board members, walking through considerations either for a) one to two sites already in scope OR b) a site added to scope within the past year.

Site Visit Findings

1. Does the health center take the following factors, including those specific to special population(s) (if applicable), into consideration in determining where to locate its sites:

   ◦ Access barriers (For example, the health center has considered the ways patients access health center sites?):
     □ YES □ NO

   ◦ Distance and time taken for patients to travel to or between service sites in order to access the health center’s full range of in-scope services (For example, if some in-scope services are located only at certain sites, the health center facilitates access to these services for the entire patient population?):
     □ YES □ NO

   If No was selected for any of the above, an explanation is required:

Element b: Accessible Hours of Operation

The health center’s total number and scheduled hours of operation across its service sites are responsive to patient needs by facilitating the ability to schedule appointments and access the health center’s full range of services within the HRSA-approved scope of project24 (for example, a health center service site might offer extended evening hours 3 days a week based on input or feedback from patients who cannot miss work for appointments during normal business hours).

Site Visit Team Methodology

- Review health center’s Form 5B to assess overall range of hours of operation and addresses of sites.
- Review needs assessment(s) or related studies or resources.
- Review patient satisfaction surveys or other forms of patient input.

24 Services provided by a health center are defined at the awardee/designee level, not by individual site. Thus, not all services must be available at every health center service site; rather, health center patients must have reasonable access to the full complement of services offered by the center as a whole, either directly or through formal written established arrangements. For further details on scope of project, including Form 5A services and column descriptors, please see http://www.bphc.hrsa.gov/programrequirements/scope.html.
- Interview relevant health center staff and board members to have them provide one to two examples of how hours are responsive to patient need.

Site Visit Findings

2. Has the health center taken patient needs into consideration in setting the hours of operation of its sites (e.g., within available resources, the hours correspond to most requested appointment times or align with the most in-demand services)?
   - YES
   - NO

   If No, an explanation is required:

Element c: Accurate Documentation of Sites within Scope of Project

The health center accurately records the sites in its HRSA-approved scope of project on its Form 5B: Service Sites in HRSA’s Electronic Handbooks (EHB).

Site Visit Team Methodology

- Review health center’s Form 5B.
- Review latest list of site addresses provided by health center and compare to those sites listed on the most current Form 5B in EHB.
- Interview relevant health center staff.

Site Visit Findings

3. Was the health center able to attest that its Form 5B is an accurate reflection of all active sites in scope?
   - YES
   - NO

   If No, an explanation is required, including specifying whether the health center can document that any necessary change in scope requests have been submitted to HRSA (e.g., request to delete an inactive site has been submitted via EHB):

25 In accordance with 45 CFR 75.308(c)(1)(i), health centers must request prior approval from HRSA for a “Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval).” This prior approval requirement applies to the addition, deletion, or replacement of a service site. These changes require prior approval from HRSA and must be submitted by the health center as a formal change in scope request. For further details on scope of project, please see http://www.bphc.hrsa.gov/programrequirements/scope.html.
COVERAGE FOR MEDICAL EMERGENCIES DURING AND AFTER HOURS

Primary Reviewer: Clinical Expert
Secondary Reviewer: TBD

Authority: Section 330(b)(1)(A)(IV) and Section 330(k)(3)(A) of the PHS Act; and 42 CFR 51c.102(h)(4), 42 CFR 56.102(l)(4), 42 CFR 51c.303(a), and 42 CFR 56.303(a)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Operating procedures for addressing medical emergencies during health center’s hours of operation
☐ Operating procedures for responding to patient medical emergencies after hours

Documents Provided at the Start of the Site Visit:

☐ Provider on-call schedules and answering service contract (if applicable; for health centers whose own providers cover after-hours calls)
☐ Written arrangements with non-health center providers/entities (e.g., formal agreements with other community providers, “nurse call” lines) for after-hours coverage (if applicable; for health centers that utilize non-health center providers)
☐ List of service delivery sites with names of at least one individual (clinical or non-clinical staff member) at each site trained and certified in basic life support, including a copy of that individual’s current certification (e.g., credentialing file for licensed independent practitioner (LIP) or other licensed or certified practitioner (OLCP), certification of training if non-clinical staff)
☐ Instructions or information provided to patients for accessing after-hours coverage
☐ Three samples of after-hours clinical advice documentation in the patient record (e.g., screenshots selected by the health center)
☐ Documentation demonstrating systems/methods of tracking, recording and storing of after-hours coverage interactions (e.g., log of patient calls) and, if applicable, related follow-up
Element a: Clinical Capacity for Responding to Emergencies During Hours of Operation

The health center has at least one staff member trained and certified in basic life support present at each HRSA-approved service site (as documented on Form 5B: Service Sites) to ensure the health center has the clinical capacity to respond to patient medical emergencies\(^\text{26}\) during the health center’s regularly scheduled hours of operation.\(^\text{27}\)

Site Visit Team Methodology

- Interview health center clinical leadership.
- Review list of service delivery sites that identifies at least one individual per site with current certification in basic life support.

Site Visit Findings

1. Was there documentation that at least one staff member (clinical or non-clinical) trained and certified in basic life support is present at each HRSA-approved service delivery site?
   - YES
   - NO

   If No, an explanation is required, including stating what, if any, provisions the health center has in place to respond to patient medical emergencies during regularly scheduled hours of operation at those site(s):

Element b: Procedures for Responding to Emergencies During Hours of Operation

The health center has and follows its applicable operating procedures when responding to patient medical emergencies during regularly scheduled hours of operation.

Site Visit Team Methodology

- Review health center’s operating procedures for responding to medical emergencies.
- Interview CMO, Clinical Director and/or equivalent regarding how the health center HAS or WOULD follow its operating procedure when responding to a patient emergency.

\(^\text{26}\) Medical emergencies may, for example, include those related to physical, oral, behavioral, or other emergent health needs.

\(^\text{27}\) See Health Center Program Compliance Manual, Chapter 6: Accessible Location and Hours of Operation for more information on hours of operation.
Site Visit Findings

2. Were you able to confirm that the health center has operating procedures for responding to patient medical emergencies during the health center’s regularly scheduled hours of operation?
   ☐ YES       ☐ NO

   If No, an explanation is required:

  ______________________________________________________________________

3. Was the health center able to describe how it either has responded to or is prepared to respond to (e.g., staff training or drills on use of procedures) patient medical emergencies during regularly scheduled hours of operation?
   ☐ YES       ☐ NO

   If No, an explanation is required:

  ______________________________________________________________________

Element c: Procedures or Arrangements for After Hours Coverage

The health center has after-hours coverage operating procedures, which may include formal arrangements\(^\text{28}\) with non-health center providers/entities that ensure:

- Coverage is provided via telephone or face-to-face by an individual with the qualification and training necessary to exercise professional judgment in assessing a health center patient's need for emergency medical care;
- Coverage includes the ability to refer patients either to a licensed independent practitioner for further consultation or to locations such as emergency rooms or urgent care facilities for further assessment or immediate care as needed; and
- Patients, including those with limited English proficiency,\(^\text{29}\) are informed of and are able to access after-hours coverage, including being provided information and instructions in the language(s), literacy levels, and formats accessible to the health center’s patient population.

Site Visit Team Methodology

- Review the health center’s operating procedures or, if applicable, other documentation of arrangements for responding to patient medical emergencies after hours.
- Review provider on-call schedules and answering service contract (if applicable).

\(^\text{28}\) See Health Center Program Compliance Manual, Chapter 12: Contracts and Subawards for more information on oversight over such arrangements.
\(^\text{29}\) Under Section 602 of Title VI of the Civil Rights Act and the Department of Health and Human Services implementing regulations (45 C.F.R. Section 80.3(b)(2)), recipients of Federal financial assistance, including health centers, must take reasonable steps to ensure meaningful access to their programs, services, and activities by eligible Limited English Proficient (LEP) persons. See http://www.hhs.gov/ocr/civilrights/resources/laws/summaryguidance.html for further guidance on translating vital documents for LEP persons.
- Review instructions or information provided to patients for accessing after-hours coverage.
- Interview CMO, Clinical Director and/or equivalent and, if applicable, outreach or front desk staff regarding methods of informing patients of after-hours coverage.
- Using contact information for after-hours coverage (e.g., phone number provided by front desk staff), call the health center once the health center is closed. Identify yourself as the site visit reviewer.

**Site Visit Findings**

4. Does the health center have written operating procedures or other documented arrangements for responding to patient medical emergencies after hours?
   - ☐ YES  ☐ NO
   If No, an explanation is required:
   [Blank line]

5. Based on the interview with clinical leadership and/or front desk staff, is information provided to patients at all health center service sites (as listed on Form 5B) on how to access after-hours coverage?
   - ☐ YES  ☐ NO
   If No, an explanation is required:
   [Blank line]

6. Has the health center addressed barriers that patients might face in attempting to utilize the health center’s after-hours coverage? This would include barriers due to limited English proficiency or literacy levels.
   - ☐ YES  ☐ NO
   If No, an explanation is required:
   [Blank line]

7. Did the results from the call made to the health center after hours confirm the following:
   - You were connected to an individual with the qualification and training necessary to exercise professional judgment to address an after-hours call?
     - ☐ YES  ☐ NO
   - This individual would have the ability (if appropriate) to refer patients to a covering licensed independent practitioner for further consultation or to locations such as emergency rooms or urgent care facilities for further assessment or immediate care?
     - ☐ YES  ☐ NO
   - Provisions are in place for calls received from patients with LEP?
     - ☐ YES  ☐ NO
   If No was selected for any of the above, an explanation is required:
   [Blank line]
Element d: After Hours Call Documentation

The health center has documentation of after-hours calls and any necessary follow-up resulting from such calls for the purposes of continuity of care.\textsuperscript{30}

Site Visit Team Methodology

- Interview CMO, Clinical Director and/or equivalent.
- Review the health center’s operating procedures or, if applicable, other documentation of arrangements (e.g., contract with nurse call line) for responding to patient medical emergencies after hours.
- Review three samples of after-hours documentation within the patient record (a screenshot of the record is also acceptable) provided by the health center.
- Request to view documentation or systems/methods for tracking, recording and storing after-hours call coverage interactions and, if applicable, related follow-up.

Site Visit Findings

8. Does the health center document after-hours calls or, if no such calls have been received, does the health center have the capacity to document such calls?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

9. Does the health center (based on review of systems or the sample of records) provide the necessary follow-up, based on the nature of after-hours calls (e.g., health center contacts the patient within a prescribed number of days to check in on the patient’s condition, schedule an appointment)?

\textit{Note}: For health centers that had no after-hours calls that required follow-up (e.g., a newly-funded health center that has just started its operations), a review of operating procedures and results of the interview(s) with health center staff can be used when responding to this question.

☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

\textsuperscript{30} See Health Center Program Compliance Manual, \textit{Chapter 8: Continuity of Care and Hospital Admitting} for more information on continuity of care.
CONTINUITY OF CARE AND HOSPITAL ADMITTING

Primary Reviewer: Clinical Expert
Secondary Reviewer: N/A

Authority: Section 330(k)(3)(A) and 330(k)(3)(L) of the PHS Act; and 42 CFR 51.c.303(a) and 42 CFR 56.303(a)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Health center’s internal operating procedures and/or documentation from arrangements with non-health center provider(s) for tracking of patient hospitalization and continuity of care

Documents Provided at the Start of the Site Visit:

☐ Documentation of EITHER:
  ◦ Provider hospital admitting privileges (e.g., hospital staff membership, provider employee contracts) that address delivery of care in a hospital setting to health center patients by health center providers; OR
  ◦ Formal arrangements with provider(s) or entity(ies) that address health center patient hospital admissions

☐ Sample of 5-10 health center patient records (e.g., using live navigation of the Electronic Health Records (EHR), screenshots from the EHR, or actual records if the records are not electronic/EHR records) who have been hospitalized or had Emergency Department (ED) visits within the past 12 months

Demonstrating Compliance

Element a: Documentation of Hospital Admitting Privileges or Arrangements

The health center has documentation of:

- Health center provider\(^{31}\) hospital admitting privileges (for example, provider employment contracts or other files indicating the provider(s) has admitting privileges at one or more hospitals); and/or

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\(^{31}\) In addition to physicians, various provider types may have admitting privileges, if applicable, based on scope of practice in their State (for example, Nurse Practitioners, Certified Nurse Midwives).
- Formal arrangements between the health center and one or more hospitals or entities (for example, hospitalists, obstetrics hospitalist practices) for the purposes of hospital admission of health center patients.

Site Visit Team Methodology

- Interview health center clinical management (e.g., CMO, Clinical Director) on processes for ensuring continuity of care for patients that require inpatient hospitalization.
- Review documentation of EITHER:
  - Provider hospital admitting privileges that address delivery of care in a hospital setting to health center patients by health center providers; OR
  - Formal arrangements with non-health center provider(s) or entity(ies) (e.g., hospitalists) that address hospital admissions of health center patients.

Site Visit Findings

1. Does the health center have:
   - Documentation of hospital admitting privileges (if select health center providers assume responsibility for admitting and following hospitalized patients); and/or
   - Formal arrangements with non-health center provider(s) or entity(ies) (such as a hospital, hospitalist group or obstetrics practice) that address health center patient hospital admissions?
     ☐ YES  ☐ NO

   If Yes OR No, an explanation is required specifying the health center’s arrangement(s) for hospital admissions:

   __________________________________________________________

Element b: Procedures for Hospitalized Patients

The health center has internal operating procedures and, if applicable, related provisions in its formal arrangements with non-health center provider(s) or entity(ies) that address the following areas for patients who are hospitalized as inpatients or who visit a hospital’s ED:\(^{32}\)

- Receipt and recording of medical information related to the hospital or ED visit, such as discharge follow-up instructions and laboratory, radiology, or other results; and
- Follow-up actions by health center staff, when appropriate.

Site Visit Team Methodology

- Review health center internal operating procedures and/or documentation from arrangements with non-health center provider(s) or entity(ies) to assess continuity of care provisions.

\(^{32}\) Health center patients may be admitted to a hospital setting through a variety of means (for example, a visit to the ED may lead to an inpatient hospital admission, or a health center patient may be directly admitted to a unit of the hospital, such as labor and delivery).
Site Visit Findings

2. Did the health center’s internal operating procedures and/or arrangements with non-health center provider(s) or entity(ies), if applicable, address the following:

- How the health center will obtain or receive medical information related to patient hospital or ED visits and record such information (e.g., discharge follow-up instructions and laboratory, radiology, or other results)?
  - YES ☐ NO ☐

- Follow-up by the health center staff, when appropriate?
  - YES ☐ NO ☐

If No was selected for any of the above, an explanation is required:
______________________________________________________________________

Element c: Post-Hospitalization Tracking and Follow-up

The health center follows its operating procedures and formal arrangements as documented by:

- Receipt and recording of medical information related to the hospital or ED visit, such as discharge follow-up instructions and laboratory, radiology, or other results; and
- Evidence of follow-up actions taken by health center staff based on the information received, when appropriate.

Site Visit Team Methodology

- In conjunction with a health center clinical staff member, have staff member navigate the reviewer through 5-10 health records.

Site Visit Findings

3. Based on the review of sampled records, was there documentation of:

- Medical information related to the hospital or ED visit, such as discharge follow-up instructions and laboratory, radiology, or other results?
  - YES ☐ NO ☐

- Follow-up actions taken by health center staff based on the information received, when appropriate?
  - YES ☐ NO ☐

Note: For a health center that has had no patients who have been hospitalized in the past 12 months (e.g., a newly-funded health center that has just started its operations), a review of operating procedures and results of the interview with health center staff can be used to respond to these questions.

If No was selected for any of the above, an explanation is required:
______________________________________________________________________
SLIDING FEE DISCOUNT PROGRAM

Primary Reviewer: Fiscal Expert  
Secondary Reviewer: Governance/Administrative Expert

Authority: Section 330(k)(3)(G) of the PHS Act; and 42 CFR 51c.303(f), 42 CFR 51c.303(g), 42 CFR 51c.303(u), 42 CFR 56.303(f), 42 CFR 56.303(g), and 42 CFR 56.303(u)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Sliding Fee Discount Program (SFDP) policy(ies)  
☐ SFDP procedure(s)  
☐ Sliding Fee Discount Schedule (SFDS), including SFDSs that differ by service or service delivery method (if applicable)  
☐ Any related policies, procedures, forms and materials that support the SFDP (e.g., registration and scheduling, financial eligibility, screening, enrollment, patient notifications, billing and collections)

Documents Provided at the Start of the Site Visit:

☐ Sample of 5-10 records, files or other forms of documentation of patient income and family size (e.g., completed SFDS application or eligibility screening records). Ensure that the sample includes uninsured and insured patient categories  
☐ For services in Column II of the health center’s current Form 5A (if applicable):  
  ◦ Sample of up to three written contracts/agreements for EACH Required and EACH Additional service provided via Column II but NOT provided via Column I  
  ◦ One written contract/agreement for EACH Required and EACH Additional service provided via Column I AND Column II  
☐ For services in Column III of the health center’s current Form 5A (if applicable):  
  ◦ Sample of up to three written referral arrangements for EACH Required and EACH Additional service provided via Column III but NOT provided via Column I  
  ◦ One written referral arrangement for EACH Required and EACH Additional service provided via Column I AND Column III  
☐ Data, reports, or any other relevant materials used to evaluate the SFDP
Element a: Applicability to In-Scope Services

The health center has a sliding fee discount program\(^{33}\) that applies to all required and additional services\(^{34}\) within the HRSA-approved scope of project for which there are distinct fees.\(^{35}\)

Site Visit Team Methodology

- Interview health center staff involved in implementing sliding fee discount program (SFDP) policies (e.g., key management staff, eligibility and outreach staff, front desk staff, billing staff, office manager, case managers) including, time permitting, a walk-through of the SFDS screening and enrollment process.
- Review the health center’s SFDP policy(ies), procedures, schedule(s) (single or multiple SFDSs, if applicable), and any related policies, procedures, forms and materials.
- Review health center’s Form 5A: Services Provided.

Site Visit Findings

1. Are ALL services within the approved scope of project offered on a sliding fee discount schedule (for Columns I & II) or offered under any other type of discount (for Column III)? “Services” refers to all Required and Additional services across all applicable service delivery methods listed on the health center’s Form 5A for which there is a distinct fee.

*Note: Please include any findings regarding the specific STRUCTURE of the SFDS for services in Columns I, II, and III within applicable elements “c,” “i,” and “j.”*

☐ YES ☐ NO

If No, an explanation is required, including specifying which in-scope services are excluded from sliding fee discounts or any other type of discount:

Element b: Sliding Fee Discount Program Policies

The health center has board-approved policy(ies) for its sliding fee discount program that apply uniformly to all patients and address the following areas:

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\(^{33}\) A health center’s SFDP consists of a schedule of discounts applied to the fee schedule and adjusts fees based on the patient’s ability to pay. A health center’s SFDP also includes the related policies and procedures for determining sliding fee eligibility and applying sliding fee discounts.

\(^{34}\) See Health Center Program Compliance Manual, Chapter 4: Required and Additional Health Services for more information on requirements for services within the scope of the project.

\(^{35}\) A distinct fee is a fee for a specific service or set of services, which is typically billed for separately within the local health care market.
• Definitions of income\textsuperscript{36} and family;
• Assessment of all patients for sliding fee discount eligibility based only on income and family size, including methods for making such assessments;
• The manner in which the health center’s SFDS(s) will be structured in order to ensure that patient charges are adjusted based on ability to pay; and
• Only applicable to health centers that choose to have a nominal charge for patients at or below 100 percent of the Federal Poverty Guidelines (FPG): The setting of a flat nominal charge(s) at a level that would be nominal from the perspective of the patient (for example, based on input from patient board members, patient surveys, advisory committees, or a review of co-pay amount(s) associated with Medicare and Medicaid for patients with comparable incomes) and would not reflect the actual cost of the service being provided.\textsuperscript{37}

Site Visit Team Methodology

- Interview board member(s) and key management staff.  
  \textit{Note:} Interviews may be conducted in collaboration with the governance/administrative expert.
- Review the health center’s SFDP policy(ies).  
  \textit{Note:} This may be combined with the policy review conducted for element “a.”
- Review any other related policies, procedures and documents provided by the health center, if applicable.
- Documentation of board involvement in setting the amount of nominal charge(s) (e.g., board minutes, reports) (applicable if the health center’s SFDP policy does not state a specific amount for nominal charge(s)).

Site Visit Findings

2. Does the health center’s sliding fee discount policy include language or provisions that address all of the following:
   
   ◦ Uniform applicability to all patients?
     □ YES        □ NO
   
   ◦ Income and family (or “household”) (e.g., any inclusions or exclusions in how they are defined)?
     □ YES        □ NO
   
   ◦ Methods for assessing patient eligibility based only on income and family size?
     □ YES        □ NO
   
   ◦ The manner in which SFDS(s) are structured to ensure charges are adjusted based on ability to pay (e.g., flat fee amounts differ across discount pay classes, a

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\textsuperscript{36} Income is defined as earnings over a given period of time used to support an individual/household unit based on a set of criteria of inclusions and exclusions. Income is distinguished from assets, as assets are a fixed economic resource while income is comprised of earnings.

\textsuperscript{37} Nominal charges are not “minimum fees,” “minimum charges,” or “co-pays.”
graduated percent of charges for patients with incomes above 100% and at or below 200% of FPG)?
☐ YES   ☐ NO

• The setting of a nominal charge(s) for patients at or below 100% FPG?
  *Note:* Select “Not Applicable” if the health center does not charge patients at or below 100% FPG.
  ☐ YES   ☐ NO   ☐ NOT APPLICABLE

If No was selected for any of the above, an explanation is required:
______________________________________________________________________

3. Does the health center’s policy ensure that any/all charge(s) for patients at or below 100% of the FPG will be:

  • A flat fee?
    ☐ YES   ☐ NO   ☐ NOT APPLICABLE
  
  • Nominal from a patient’s perspective?
    ☐ YES   ☐ NO   ☐ NOT APPLICABLE
  
  • Not based on the actual cost of the service?
    ☐ YES   ☐ NO   ☐ NOT APPLICABLE

  *Note:* The health center’s SFD policy may state how the nominal charge will be determined AND/OR the amount of the nominal charge(s).

If No was selected for any of the above, an explanation is required:
______________________________________________________________________

Element c: Sliding Fee for Column I Services

For services provided directly by the health center (Form 5A: Services Provided, Column I), the health center’s SFDS(s) is structured consistent with its policy and provides discounts as follows:

- A full discount is provided for individuals and families with annual incomes at or below 100 percent of the current FPG, unless a health center elects to have a nominal charge, which would be less than the fee paid by a patient in the first sliding fee discount pay class above 100 percent of the FPG.
- Partial discounts are provided for individuals and families with incomes above 100 percent of the current FPG and at or below 200 percent of the current FPG, and those discounts adjust based on gradations in income levels and include at least three discount pay classes.38

38 For example, a SFDS with discount pay classes of 101 percent to 125 percent of the FPG, 126 percent to 150 percent of the FPG, 151 percent to 175 percent of the FPG, 176 percent to 200 percent of the
• No discounts are provided to individuals and families with annual incomes above 200 percent of the current FPG.\textsuperscript{39}

Site Visit Team Methodology

- Review the structure of the health center’s SFDS(s) for Column I services. \textit{Note: For health centers that utilize multiple SFDSs, the structure of each SFDS must be reviewed, including, if applicable, any nominal charges.}

Site Visit Findings

\textit{In responding to the questions below, please note:}
\textit{The questions relate to services provided directly by the health center (Form 5A: Services Provided, Column I).}

4. For patients with incomes at or below 100\% of FPG, does the SFDS(s):

   ◦ Provide a full discount (100\% discount)?
     ☐ YES ☐ NO

   ◦ Require only a nominal charge(s) ("fee")?
     ☐ YES ☐ NO

   If No was selected for BOTH of the above, an explanation is required:

   \hline
   5. If the health center has a nominal charge(s), is the nominal charge(s) less than the fee that would be paid by patients in the first sliding fee discount pay class above 100\% of FPG?
     ☐ YES ☐ NO ☐ NOT APPLICABLE

   If No, an explanation is required:

   \hline
   6. For patients with incomes above 100\% and at or below 200\% of the FPG, does the SFDS(s) provide partial discounts in accordance with gradations in income levels and consist of at least three discount pay classes?
     ☐ YES ☐ NO

   If No, an explanation is required:

   \hline
   7. For patients with incomes above 200\% of the FPG, is the SFDS(s) structured so that such patients are not eligible for a sliding fee discount under the Health Center Program?

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\textsuperscript{39} Please see Health Center Program Compliance Manual, Chapter 16: Billing and Collections, if the health center has access to other grants or subsidies that support patient care.
Note: Health centers that provide sliding fee discounts to patients with incomes above 200% of the FPG may do so as long as such discounts are supported through other funding sources (e.g., Ryan White Part C award).

☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

Element d: Multiple Sliding Fee Discount Schedules

For health centers that choose to have more than one SFDS, these SFDSs would be based on services (for example, having separate SFDSs for broad service types, such as medical and dental, or distinct subcategories of service types, such as preventive dental and additional dental services) and/or on service delivery methods (for example, having separate SFDSs for services provided directly by the health center and for in-scope services provided via formal written contract) and no other factors.

Site Visit Team Methodology
-  Review each different SFDS in use and the basis for the separate discount schedule(s) (if applicable).

Site Visit Findings

8. Does the health center have more than one SFDS?
   ☐ YES  ☐ NO

9. If Yes: Is each SFDS based either on service or service delivery method and no other factors (e.g., patient insurance status, location of site, other demographic or patient characteristics)?
   ☐ YES  ☐ NO  ☐ NOT APPLICABLE

If No, an explanation is required:
______________________________________________________________________

Element e: Incorporation of Current Federal Poverty Guidelines

The health center's SFDS(s) has incorporated the most recent FPG.

Site Visit Team Methodology
-  Review the SFDS(s) for the income ranges and family size.
Site Visit Findings

10. Based on the review of the health center’s current SFDS(s), has the health center incorporated the current FPG in the calculations for all of the discount pay classes?
☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

Element f: Procedures for Assessing Income and Family Size

The health center has operating procedures for assessing/re-assessing all patients for income and family size consistent with board-approved sliding fee discount program policies.

Site Visit Team Methodology

- See methodologies for elements “a” and “b” above.
- Interview additional health center staff (e.g., eligibility and outreach staff, front desk staff, billing staff, office manager, case managers).

Site Visit Findings

11. Does the health center have operating procedures for assessing/re-assessing all patients (regardless of insurance status) for income and family size?
☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

12. Are these procedures consistent with the board-approved policy for the sliding fee discount program?
☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

Element g: Assessing and Documenting Income and Family Size

The health center has records of assessing/re-assessing patient income and family size except in situations where a patient has declined or refused to provide such information.

Site Visit Team Methodology

- Review a sample of 5-10 records, files or other forms of documentation of patient income and family size. Ensure the sample includes uninsured and insured patient categories.
Site Visit Findings

13. Did the review of the sample indicate that the health center is consistently assessing and re-assessing patient income and family size?
   ☐ YES ☐ NO

   If No, an explanation is required. If information on patient income and family size is missing, state whether the health center documented that the patient declined or refused to provide income and family size information:

______________________________________________________________________

Element h: Informing Patients of Sliding Fee Discounts

The health center has mechanisms for informing patients of the availability of sliding fee discounts (for example, distributing materials in language(s) and literacy levels appropriate for the patient population, including information in the intake process, and publishing information on the health center’s website).

Site Visit Team Methodology

- Site tour(s), interviews with health center staff (e.g., eligibility and outreach staff, front desk staff, billing staff, office manager, case managers) and review of mechanisms for informing patients.

Site Visit Findings

14. Based on site tours, interviews, and review of related materials, does the health center have mechanisms for informing patients of the availability of sliding fee discounts and how to apply for such discounts?
   ☐ YES ☐ NO

   If No, an explanation is required:

______________________________________________________________________

Element i: Sliding Fee for Column II Services

For in-scope services provided via contracts (Form 5A: Services Provided, Column II, Formal Written Contract/Agreement), the health center ensures that fees for such services are discounted as follows:

- A full discount is provided for individuals and families with annual incomes at or below 100 percent of the current FPG, unless a health center elects to have a nominal charge, which would be less than the fee paid by a patient in the first sliding fee discount pay class above 100 percent of the FPG.
- Partial discounts are provided for individuals and families with incomes above 100 percent of the current FPG and at or below 200 percent of the current FPG, and those discounts adjust based on gradations in income levels and include at least three discount pay classes.
• No discounts are provided to individuals and families with annual incomes above 200 percent of the current FPG.\(^{40}\)

**Site Visit Team Methodology**

- Interview health center staff involved in administering contracts for services.
- Review services in Column II of the health center's current Form 5A (if applicable):
  - Sample of **up to** three written contracts/agreements for EACH Required and EACH Additional service provided via Column II but NOT provided via Column I.
  - One written contract/agreement for EACH Required and EACH Additional service provided via Column I AND Column II.

*Note:* The fiscal expert may wish to collaborate on the review of contracts/agreements with the clinical expert.

**Site Visit Findings**

*In responding to the questions below, please note:*

The questions relate to services provided via contracts (Form 5A: Services Provided, Column II).

15. For patients receiving service(s) through these contracts/agreements, has the health center ensured that sliding fee discounts are provided in a manner that meets all Health Center Program requirements (e.g., health center applies its own SFDS to amounts owed by eligible patients; contract contains specific sliding fee provisions; contracted services are provided by another health center which applies an SFDS that meets structural requirements)?
   - [ ] YES  [ ] NO

   If No, an explanation is required:

______________________________________________________________________

16. For patients with incomes at or below 100% of FPG, has the health center ensured that such patients are:

   ◦ Provided a full discount (100% discount)?
     [ ] YES  [ ] NO

   ◦ Assessed a nominal charge(s) (“fee”)?
     [ ] YES  [ ] NO

   If No was selected for BOTH of the above, an explanation is required:

______________________________________________________________________

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\(^{40}\) Please see Health Center Program Compliance Manual, *Chapter 16: Billing and Collections*, if the health center has access to other grants or subsidies that support patient care.
17. If there is a nominal charge, is the nominal charge less than the fee that would be paid by patients in the first sliding fee discount pay class above 100% of FPG?

☐ YES  ☐ NO  ☐ NOT APPLICABLE

If No, an explanation is required:
______________________________________________________________________

18. For patients with incomes above 100% and at or below 200% of the FPG, does the SFDS(s) provide partial discounts in accordance with gradations in income levels and consist of at least three discount pay classes?

☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

19. For patients with incomes above 200% of the FPG, is the SFDS(s) structured so that such patients are not eligible for a sliding fee discount under the Health Center Program?

**Note:** Health centers that provide sliding fee discounts to patients with incomes above 200% of the FPG may do so as long as such discounts are supported through other funding sources (e.g., Ryan White Part C award).

☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

**Element j: Sliding Fee for Column III Services**

For services provided via formal referral arrangements (Form 5A: Services Provided, Column III), the health center ensures that fees for such services are either discounted as described in element “c” above or discounted in a manner such that:

- Individuals and families with incomes above 100 percent of the current FPG and at or below 200 percent of the FPG receive an equal or greater discount for these services than if the health center’s SFDS were applied to the referral provider’s fee schedule; and
- Individuals and families at or below 100 percent of the FPG receive a full discount or a nominal charge for these services.

**Site Visit Team Methodology**

- Interview health center staff involved in administering referral arrangements for services.
- For services in Column III of the health center’s current Form 5A, review the following:
  - Sample of up to three written referral arrangements for EACH Required and EACH Additional service provided via Column III but NOT provided via Column I.
  - One written referral arrangement for EACH Required and EACH Additional service provided via Column I AND Column III.

**Note:** The fiscal expert may wish to collaborate on the review of referral arrangements with the clinical expert.
Site Visit Findings

In responding to the questions below, please note:
The questions relate to services provided via formal referral arrangements (Form 5A: Services Provided, Column III).

20. For patients receiving service through these referral arrangements, has the health center ensured that sliding fee discounts are EITHER provided in a manner that meets the structural requirements noted in Element “c” OR discounted in a manner such that:

- Individuals and families with incomes above 100% of the current FPG and at or below 200% of the FPG receive an equal or greater discount for these services than if the health center’s SFDS were applied to the referral provider’s fee schedule (e.g., health center has a referral arrangement with organizations that charge no fee at all for patients at or below 200% of the FPG); and
- Individuals and families at or below 100% of the FPG receive a full discount or a nominal charge for these services?

☐ YES  ☐ NO

If No, an explanation is required, including describing the format and type of any discount(s) provided:

Element k: Applicability to Patients with Third Party Coverage

Health center patients who are eligible for sliding fee discounts and have third-party coverage are charged no more for any out-of-pocket costs than they would have paid under the applicable SFDS discount pay class. Such discounts are subject to potential legal and contractual restrictions. Such limitations may be specified by applicable federal or state programs, or private payor contracts.

Site Visit Team Methodology

- See methodology for elements “a,” “b,” and “f” above.

Note: A review of third-party coverage contracts is not necessary.

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41 For example, an insured patient receives a health center service for which the health center has established a fee of $80, per its fee schedule. Based on the patient’s insurance plan, the co-pay would be $60 for this service. The health center also has determined, through an assessment of income and family size, that the patient’s income is 150 percent of the FPG and thus qualifies for the health center’s SFDS. Under the SFDS, a patient with an income at 150 percent of the FPG would receive a 50 percent discount of the $80 fee, resulting in a charge of $40 for this service. Rather than the $60 co-pay, the health center would charge the patient no more than $40 out-of-pocket, consistent with its SFDS, as long as this is not precluded or prohibited by the applicable insurance contract.

42 Such limitations may be specified by applicable federal or state programs, or private payor contracts.
Site Visit Findings

21. Based on interviews and a review of related documents, does the health center ensure that patients who are eligible for sliding fee discounts and who have third-party coverage are charged no more for any out-of-pocket costs (e.g., deductibles, co-pays, and services not covered by the plan) than they would have paid under the applicable SFDS discount pay class?
☐ YES  ☐ NO

If No, an explanation is required. If the health center states that it is unable to provide discounts to such patients due to legal or contractual restrictions, please note this in the response:
____________________________________________________________________

Element I: Evaluation of the Sliding Fee Discount Program

The health center evaluates, at least once every three years, its sliding fee discount program. At a minimum, the health center:

- Collects utilization data that allows it to assess the rate at which patients within each of its discount pay classes, as well as those at or below 100 percent of the FPG, are accessing health center services;
- Utilizes this and, if applicable, other data (for example, results of patient satisfaction surveys or focus groups, surveys of patients at various income levels) to evaluate the effectiveness of its sliding fee discount program in reducing financial barriers to care; and
- Identifies and implements changes as needed.

Site Visit Team Methodology

- See methodology for elements “a,” “b,” and “f” above.
- Review data, reports or any other relevant materials used to evaluate the SFDP.

Site Visit Findings

22. For the purposes of assessing the effectiveness of the SFDP in reducing financial barriers to care, does the health center collect data that allow it to assess whether patients within each of its discount pay classes are accessing health center services?
☐ YES  ☐ NO

If No, an explanation is required:
____________________________________________________________________

23. Does the health center utilize these data and, if applicable, any other data, to evaluate the effectiveness of its sliding fee discount program at least once every three years?
☐ YES  ☐ NO

If No, an explanation is required:
____________________________________________________________________
24. Has the health center implemented any follow-up actions based on evaluation results (e.g., changes to sliding fee discount program policy by board, implementation of improved eligibility screening processes or notification methods for sliding fee discounts)?
☐ YES  ☐ NO

If No, an explanation is required:
QUALITY IMPROVEMENT/ASSURANCE

Primary Reviewer: Clinical Expert
Secondary Reviewer: N/A

Authority: Section 330(k)(3)(C) of the PHS Act; and 42 CFR 51c.110, 42 CFR 51c.303(b), 42 CFR 51c.303(c), 42 CFR 51c.304(d)(3)(iv-vi), 42 CFR 56.111, 42 CFR 56.303(b), 42 CFR 56.303(c), and 42 CFR 56.304(d)(4)(v-vii)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Policy(ies) that establish the Quality Improvement/Quality Assurance (QI/QA) program
☐ QI/QA-related operating procedures or processes that address:
  ◦ clinical guidelines, standards of care, and/or standards of practice
  ◦ patient safety and adverse events, including implementation of follow-up actions
  ◦ patient satisfaction
  ◦ patient grievances
  ◦ periodic QI/QA assessments
  ◦ QI/QA report generation and oversight
☐ Systems and/or procedures for maintaining and monitoring the confidentiality, privacy and security of patient records

Documents Provided at the Start of the Site Visit:

☐ Sample of patient satisfaction results
☐ Sample of two QI/QA assessments from the past year and/or the related reports resulting from these assessments
☐ Job or position description(s) of individual(s) who oversee the QI/QA program
☐ Sample of 5-10 health center patient records (e.g., using live navigation of the Electronic Health Records (EHR), screenshots from the EHR, or actual records if the records are not electronic/EHR records) that include clinic visit note(s) and/or summary of care.  
  Note: The same sample of patient records utilized for reviewing other program requirement areas may also be used for this sample
☐ Documentation for related systems that support QI/QA (if applicable) (e.g., event reporting system, tracking resolutions & grievances, dashboards)
☐ Schedule of QI/QA assessments
Demonstrating Compliance

Element a: QI/QA Program Policies

The health center has a board-approved policy(ies) that establishes a QI/QA program. This QI/QA program addresses the following:

- The quality and utilization of health center services;
- Patient satisfaction and patient grievance processes; and
- Patient safety, including adverse events.

Site Visit Team Methodology

- Review the health center’s policy(ies) that establish the QI/QA program.
- Interview individual(s) designated to oversee the QI/QA program and related staff that support QI/QA.

Site Visit Findings

1. Does the health center have a QI/QA program that addresses the following areas:
   - The quality and utilization of health center services? □ YES □ NO
   - Patient satisfaction and patient grievance processes? □ YES □ NO
   - Patient safety, including adverse events? □ YES □ NO

   **Note:** If board approval of QI/QA policy(ies) is lacking, address this under Board Authority.

   If No was selected for any of the above, an explanation is required, specifying which areas were not addressed:

   ________________________________________________________________

Element b: Designee to Oversee QI/QA Program

The health center designates an individual(s) to oversee the QI/QA program established by board-approved policy(ies). This individual’s responsibilities would include, but would not be limited to, ensuring the implementation of QI/QA operating procedures and related assessments, monitoring QI/QA outcomes, and updating QI/QA operating procedures.

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43 For more information on the health center governing board’s role in approving policies, please see Health Center Program Compliance Manual, Chapter 19: Board Authority.
Site Visit Team Methodology

- Review job/position description(s) or other documents for background on the responsibilities of the individual(s) overseeing the QI/QA program.
- Interview individual(s) designated to oversee the QI/QA program to further understand their role(s) and responsibilities.

Site Visit Findings

2. Does the health center have a designated individual(s) to oversee the QI/QA program?
   ☐ YES       ☐ NO
   
   If No, an explanation is required:
   ______________________________________________________________________

3. Based on the interview(s) and review of the job/position description(s) or other documentation, do the responsibilities of this individual(s) include:
   
   ◦ Ensuring the implementation of QI/QA operating procedures?
     ☐ YES       ☐ NO
   
   ◦ Ensuring QI/QA assessments are conducted?
     ☐ YES       ☐ NO
   
   ◦ Monitoring QI/QA outcomes?
     ☐ YES       ☐ NO
   
   ◦ Updating QI/QA operating procedures, as needed?
     ☐ YES       ☐ NO
   
   If No was selected for any of the above, an explanation is required:
   ______________________________________________________________________

Element c: QI/QA Procedures or Processes

The health center has operating procedures or processes that address all of the following:

- Adhering to current evidence-based clinical guidelines, standards of care, and standards of practice in the provision of health center services, as applicable;
- Identifying, analyzing, and addressing patient safety and adverse events and implementing follow-up actions, as necessary;
- Assessing patient satisfaction;
- Hearing and resolving patient grievances;
- Completing periodic QI/QA assessments on at least a quarterly basis to inform the modification of the provision of health center services, as appropriate; and
- Producing and sharing reports on QI/QA to support decision-making and oversight by key management staff and by the governing board regarding the provision of health center services.
Site Visit Team Methodology

- Interview individual(s) responsible for the QI/QA program.
- Review the health center’s QI/QA-related operating procedures or processes that address:
  ◦ clinical guidelines, standards of care, and/or standards of practice
  ◦ patient safety and adverse events, including implementation of follow-up actions
  ◦ patient satisfaction
  ◦ patient grievances
  ◦ periodic QI/QA assessments
  ◦ QI/QA report generation and oversight
- Review sample of patient satisfaction results.
- Review related systems and/or documentation that support QI/QA.
- Review schedule of QI/QA assessments.
- Review sample of two QI/QA assessments from the past year and/or the related reports resulting from these assessments.

Site Visit Findings

4. Does the health center have operating procedures and/or related systems that address:
   ◦ Adherence to current, applicable evidence-based clinical guidelines, standards of care, and standards of practice (e.g., provider access to EHR clinical decision making support, job aids, protocols and/or other sources of evidence-based care)?
     □ YES □ NO
   ◦ A process for health center staff to follow for identifying, analyzing, and addressing overall patient safety, including adverse events?
     □ YES □ NO
   ◦ A process for implementing follow-up actions related to patient safety and adverse events, as necessary?
     □ YES □ NO
   ◦ A process for the health center to assess patient satisfaction (e.g., fielding patient satisfaction surveys, conducting periodic patient focus groups)?
     □ YES □ NO
   ◦ A process for hearing and resolving patient grievances?
     □ YES □ NO
   ◦ Completion of periodic QI/QA assessments on at least a quarterly basis?
     □ YES □ NO

If No was selected for any of the above, an explanation is required, including specifying which areas were not addressed:
5. Does the health center share reports on QI/QA, including data on patient satisfaction and patient safety with key management staff and the governing board?

☐ YES  ☐ NO

If No, an explanation is required:

______________________________________________________________________

6. Was the health center able to share an example(s) of how these reports support decision-making and oversight by key management staff and the governing board regarding the provision of health center services and responses to patient satisfaction and patient safety issues?

☐ YES  ☐ NO

If No, an explanation is required:

______________________________________________________________________

Element d: Quarterly Assessments of Clinician Care

The health center’s physicians or other licensed health care professionals conduct QI/QA assessments on at least a quarterly basis, using data systematically collected from patient records, to ensure:

- Provider adheres to current evidence-based clinical guidelines, standards of care, and standards of practice in the provision of health center services, as applicable; and
- The identification of any patient safety and adverse events and the implementation of related follow-up actions, as necessary.

Site Visit Team Methodology

- Interview individual(s) responsible for the QI/QA program.
- Review the health center’s operating procedures or processes that address periodic QI/QA assessments.
- Review related systems and/or documentation that support QI/QA.
- Review schedule of QI/QA assessments.
- Review sample of two QI/QA assessments from the past year and/or the related reports resulting from these assessments.

Site Visit Findings

7. Are the health center’s QI/QA assessments conducted by physicians or other licensed health care professionals (such as nurse practitioner, registered nurse or other qualified individual)?

☐ YES  ☐ NO

If No, an explanation is required:

______________________________________________________________________
8. Are these QI/QA assessments based on data systematically collected from patient records?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

9. Do these assessments demonstrate that the health center is tracking and, as necessary, addressing issues related to the quality and safety of the care provided to health center patients (e.g., use of appropriate medications for asthma, early entry into prenatal care, HIV linkages to care, response initiated as a result of a recent adverse event)?
☐ YES ☐ NO

If No, an explanation is required, including specifying which areas the health center is not tracking and/or addressing:
______________________________________________________________________

Element e: Retrievable Health Records

The health center maintains a retrievable health record (for example, the health center has implemented a certified EHR)\(^{44}\) for each patient, the format and content of which is consistent with both federal and state laws and requirements.

Site Visit Team Methodology

- In conjunction with a health center’s clinical staff member(s), review the sample of 5-10 health center patient records.

Site Visit Findings

In responding to the questions below, please note:

Issues related to timeliness, accuracy and completeness of data retrieval used for Uniform Data System (UDS) reporting are covered under Program Monitoring and Data Reporting Systems.

10. Does the health center maintain an individual health record that is in a structured format and easily retrievable?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

\(^{44}\) CMS and the Office of the National Coordinator for Health Information Technology (ONC) have established standards and other criteria for structured data that EHRs must use in order to qualify for CMS incentive programs. For health centers that participate in these CMS Incentive Programs, further information is available at [https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Certification.html](https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Certification.html).
11. Does the health center have a process for ensuring that the format and content of its health records are consistent with applicable federal and state laws and requirements (for example, the health center has implemented a certified EHR)?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

Element f: Confidentiality of Patient Information

The health center has implemented systems (for example, certified EHRs and corresponding standard operating procedures) for protecting the confidentiality of patient information and safeguarding this information against loss, destruction, or unauthorized use, consistent with federal and state requirements.

Site Visit Team Methodology

- Review health information technology (medical record) systems and procedures for maintaining and monitoring the confidentiality, privacy and security of protected health information (PHI).
- Interview applicable staff (such as CMO, health information technology personnel, Compliance or Security Officer) on how they maintain up-to-date knowledge about federal and state requirements related to confidentiality, privacy and security and actions taken by the health center to comply with these provisions across all sites (e.g., staff training).

Site Visit Findings

12. Do the health center’s health information technology or other record keeping procedures address current federal and state requirements related to confidentiality, privacy and security of protected health information (PHI) including safeguards against loss, destruction, or unauthorized use?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

13. Does the health center ensure its staff are trained in confidentiality, privacy, and security?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________
KEY MANAGEMENT STAFF

**Primary Reviewer:** Governance/Administrative Expert  
**Secondary Reviewer:** Fiscal and Clinical Expert (as needed)

**Authority:** Section 330(k)(3)(H)(ii), and 330(k)(3)(I)(i) of the PHS Act; 42 CFR 51c.104(b)(4), 42 CFR 51c.303(p), 42 CFR 56.104(b)(5), and 42 CFR 56.303(p); and 45 CFR 75.308(c)(1)(ii)(iii)

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**Document Checklist for Health Center Staff**

**Documents Provided Prior to Site Visit:**

- Health center organization chart(s) with names of key management staff (if updated since last submission to HRSA/BPHC)
- Position descriptions of key management staff (if updated since last submission to HRSA/BPHC)
- Bios or resumes for key management staff (if updated since last application submission to HRSA/BPHC)
- Co-applicant agreement (if applicable) (if updated since last application submission to HRSA/BPHC)
- HR procedures relevant to recruiting and hiring of key management staff (if applicable, for health centers with key management staff vacancies)

**Documents Provided at the Start of the Site Visit:**

- Project Director/CEO employment agreement
- Project Director’s/CEO’s Form W-2 or, if a Form W-2 has not yet been issued, documentation of receipt of salary directly from the health center (e.g., pay stub)
- Contracts for key management staff (if applicable)
- Documentation associated with filling key management staff vacancies (if applicable) (e.g., job advertisements, revised position descriptions)

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**Demonstrating Compliance**

**Element a: Composition and Functions of Key Management Staff**

The health center has determined the makeup and distribution of functions among its key management staff and the percentage of time dedicated to the health center project for each position, as necessary, to carry out the HRSA-approved scope of project.

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45 Examples of key management staff may include Project Director/CEO, Clinical Director/Chief Medical Officer, Chief Financial Officer, Chief Operating Officer, Nursing/Health Services Director, or Chief Information Officer.
Site Visit Team Methodology

- Review Form 2: Staffing Profile and review the position descriptions or contracts for key management staff from the most recent Service Area Competition (SAC)/Renewal of Designation (RD) application, and if applicable, review any new job descriptions.
- Review the health center organization chart(s).
- Interview various members of the health center’s key management staff to determine how key functions are distributed and carried out.

Site Visit Findings

1. Was the health center able to justify how the distribution of functions and allocation of time for each key management position is sufficient to carry out the approved scope of the health center project (e.g., Is there a clear justification for a part-time Project Director/CEO or for the lack of a dedicated CFO position)?
   - YES
   - NO

If No, an explanation is required, including describing why the distribution of functions and allocation of time for each key management position is insufficient to carry out the scope of project:

Element b: Documentation for Key Management Staff Positions

The health center has documented the training and experience qualifications, as well as the duties or functions, for each key management staff position (for example, in position descriptions).

Site Visit Team Methodology

N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (SAC or RD). No onsite review of this element is required.

Site Visit Findings

N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (SAC or RD). No onsite review of this element is required.

Element c: Process for Filling Key Management Vacancies

The health center has implemented, as necessary, a process for filling open key management staff positions (for example, vacancy announcements have been published and reflect the identified qualifications).
Site Visit Team Methodology

- Review health center organization chart(s) and compare to current key management staff. Note if there are any vacancies.
- If key management staff vacancy is noted, review HR procedures relevant to recruiting and hiring of key management staff and interview person(s) responsible for health center hiring/HR functions and documentation associated with filling the vacancy.

Site Visit Findings

2. Does the health center have any vacant key management positions?
   ☐ YES ☐ NO

3. **If Yes:** Will or has the health center implement(ed) a process for filling this position?
   ☐ YES ☐ NO ☐ NOT APPLICABLE

   If No, an explanation is required, including specifying which position(s) are vacant:

   __________________________________________

Element d: CEO Responsibilities

The health center’s Project Director/CEO is directly employed by the health center, reports to the health center’s governing board and is responsible for overseeing other key management staff in carrying out the day-to-day activities necessary to fulfill the HRSA-approved scope of project.

Site Visit Team Methodology

- Review health center organization chart(s).
- Review position descriptions or contracts for key management staff and, if necessary, any other documentation of key management reporting structures.

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46 While the position title of the key person specified in the award/designation may vary, for the purposes of the Health Center Program, utilize the term “Project Director/CEO” when referring to this key person. Under 45 CFR 75.2, the term “Principal Investigator/Program Director (PI/PD)” means the individual(s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. For the purposes of the Health Center Program, “Project Director/CEO” is synonymous with the term “PI/PD.”

47 Public agency health centers utilizing a co-applicant structure would demonstrate compliance with the statutory requirement for direct employment of the Project Director/CEO by demonstrating that the public agency, as the Health Center Program awardee/designee of record, directly employs the Project Director/CEO. Refer to related requirements in Chapter 19: Board Authority regarding public agencies with co-applicants.

48 Please refer to Health Center Program Compliance Manual, Chapter 19: Board Authority regarding the selection and dismissal of the Project Director/CEO by the health center board as part of its oversight responsibilities for the Health Center Program project.
- Review the Project Director’s/CEO’s Form W-2 or, if a Form W-2 has not yet been issued by the health center, documentation of receipt of salary directly from the health center.
- For public agencies with a co-applicant board, review the co-applicant agreement.
- Interview Project Director/CEO.

Site Visit Findings

4. Is the Project Director/CEO directly employed by the health center as confirmed by a Form W-2 (or, if a Form W-2 has not yet been issued by the health center, documentation of receipt of salary directly from the health center such as a pay stub)?
   - YES
   - NO

If No, an explanation is required:
______________________________________________________________________

5. Does the Project Director/CEO report to the health center board?

   Note: In a public center with a co-applicant board where the public center employs the Project Director/CEO, the Project Director/CEO may report both to the co-applicant board and to another board or individual within the public agency.

   - YES
   - NO

If No, an explanation is required:
______________________________________________________________________

6. Does the Project Director/CEO oversee other key management staff in carrying out the day-to-day activities of the health center project?

   - YES
   - NO

If No, an explanation is required:
______________________________________________________________________

Element e: HRSA Approval for Project Director/CEO Changes

If there has been a post-award change in the Project Director/CEO position,49 the health center requests and receives prior approval from HRSA.

Site Visit Team Methodology

- Determine whether there has been a change in the Project Director/CEO since the start of the current project or designation period.
  - If yes, review prior approval documentation submitted to HRSA.

______________________________________________________________________

49 Such changes include situations in which the current health center Project Director/CEO will be disengaged from involvement in the project for any continuous period for more than 3 months or will reduce time devoted to the project by 25 percent or more from the level that was approved at the time of award [see: 45 CFR 75.308(c)(1)(ii) and (iii)].
Site Visit Findings

7. Has there been a change in the Project Director/CEO position since the start of the current project or designation period?

   Note: This ONLY includes situations in which the Project Director/CEO was disengaged from involvement in the project for any continuous period for more than 3 months or reduced time devoted to the project by 25% or more from the level that was approved at the time of award.

   ☐ YES ☐ NO

8. If Yes: Was the health center able to produce documentation of its request for prior approval and the related approval from HRSA (unless still under review by HRSA) for this change?

   ☐ YES ☐ NO ☐ NOT APPLICABLE

   If No, an explanation is required:

______________________________________________________________________
CONTRACTS AND SUBAWARDS

Primary Reviewer: Fiscal Expert
Secondary Reviewer: Governance/Administrative Expert

Authority: Section 330(k)(3)(I) and Section 330(q) of the PHS Act; 42 CFR 51c.113, 42 CFR 56.114, 42 CFR 51c.303(t), and 42 CFR 56.303(t); 45 CFR Part 75 Subpart D; and Section 1861(aa)(4)(A)(ii) and Section 1905(l)(2)(B)(ii) of the Social Security Act

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Procedures for purchasing and procurement, including, if applicable or separate, procedures for contracting and contract management
☐ Most recent annual audit and management letters
☐ All subrecipient agreements (if updated since last application submission to HRSA/BPHC) (not applicable to look-alikes and as applicable for awardees)

Documents Provided at the Start of the Site Visit:

☐ Complete list of all contracts for goods or services for procurement actions that were $25,000 or more and include costs directly attributable to the federal Health Center Program award (not applicable to look-alikes and as applicable for awardees)
☐ From the above list of all contracts, a sample of half or five (whichever sample size is smaller) current contracts AND related supporting procurement documentation (not applicable to look-alikes and as applicable for awardees)
☐ Sample of up to five final contracts that support the HRSA-approved scope of project, including Column II service contracts, regardless of whether the costs of such contracts are directly attributable to the federal award (if applicable). Note: The same sample of contracts utilized for reviewing other program requirement areas may also be used for this sample
☐ Sample of two to three reports or records from contractors selected for the sample above (e.g., monthly invoices or billing reports, data run of patients served, visits provided)
☐ Documentation of subrecipient monitoring methods (not applicable to look-alikes and as applicable for awardees)
☐ Sample of financial and performance reports from the subrecipient (not applicable to look-alikes and as applicable for awardees)
☐ Documentation of prior approval for contracts for the performance of substantive work (i.e., contracting with a single entity for the majority of health care providers) under the federal award (if applicable)
☐ Documentation of prior approval of subrecipient arrangement(s) (not applicable to look-alikes and as applicable for awardees)
Contracts: Procurement and Monitoring

Element a: Procurement Procedures

The health center has written procurement procedures that comply with federal procurement standards, including a process for ensuring that all procurement costs directly attributable to the federal award are allowable, consistent with Federal Cost Principles.\(^{50}\)

Site Visit Team Methodology

- Review health center’s procedures for purchasing and procurement, including any related to contracting and contract management.

Site Visit Findings

1. Does the health center have written procedures for procurement?
   - YES
   - NO

   If No, an explanation is required:

______________________________________________________________________

2. Do these procedures, at a minimum, ensure that all procurements directly attributable to the federal award will be conducted in a manner providing full and open competition and will only include costs allowable, consistent with Federal Cost Principles (e.g., do the procedures contain relevant references or citations to 45 CFR Part 75 Subpart E: Cost Principles)\(^{50}\)?

   Note: Select “Not Applicable” if the health center is a look-alike.
   - YES
   - NO
   - NOT APPLICABLE

   If No, an explanation is required:

______________________________________________________________________

Element b: Records of Procurement Actions

NOT APPLICABLE FOR LOOK-ALIKES\(^{51}\)

The health center has records for procurement actions paid for in whole or in part under the Federal award that include the rationale for method of procurement, selection of contract type,

\(^{50}\) See 45 CFR 75 Subpart E: Cost Principles.

\(^{51}\) Because look-alikes do not receive federal funding under section 330 of the Public Health Service (PHS) Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.
contractor selection or rejection, and the basis for the contract price. This would include documentation related to noncompetitive procurements.

Site Visit Team Methodology

- Review sample of half or five (whichever sample size is smaller) current contracts that include costs directly attributable to the federal Health Center Program award AND related supporting procurement documentation for actions that were $25,000 or more (not applicable to look-alikes and as applicable for awardees).

Site Visit Findings

3. Based on the review of the sample of contracts, was there supporting documentation of the procurement process that addressed the following:

   ◦ Rationale for the procurement method?
     □ YES   □ NO   □ NOT APPLICABLE
   
   ◦ Selection of contract type?
     □ YES   □ NO   □ NOT APPLICABLE
   
   ◦ Contractor selection or rejection?
     □ YES   □ NO   □ NOT APPLICABLE
   
   ◦ Basis for the contract price?
     □ YES   □ NO   □ NOT APPLICABLE

   **Note:** Select “Not Applicable” if the health center:
   - Does not have any active contracts paid for in whole or in part utilizing Federal award funds.
   - Had contracts paid for in whole or in part with Federal funds but the period of performance for such contracts ended more than three years ago.

   If No OR Not Applicable was selected for any of the above, an explanation is required:

   ____________________________________________________________________

Element c: Retention of Final Contracts

**NOT APPLICABLE FOR LOOK-ALIKES**

The health center retains final contracts and related procurement records, consistent with federal document maintenance requirements, for procurement actions paid for in whole or in part under the Federal award.

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**Footnotes:**

52 Because look-alikes do not receive federal funding under section 330 of the PHS Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.

53 See 45 CFR 75.361 for HHS retention requirements for records.
Site Visit Team Methodology

- Review sample of half or five (whichever sample size is smaller) current contracts that include costs directly attributable to the federal Health Center Program award AND related supporting procurement documentation for actions that were $25,000 or more (not applicable to look-alikes and as applicable for awardees).

Site Visit Findings

4. Was the health center able to produce final contracts that have been awarded within the past three years?

☐ YES  ☐ NO  ☐ NOT APPLICABLE

Note: Select “Not Applicable” if the health center:
- Does not have any active contracts paid for in whole or in part utilizing Federal award funds.
- Had contracts paid for in whole or in part with Federal funds but the period of performance for such contracts ended more than three years ago.

If No OR Not Applicable, an explanation is required:
______________________________________________________________________

Element d: Contractor Reporting

The health center has access to contractor records and reports related to health center activities in order to ensure that all activities and reporting requirements are being carried out in accordance with the provisions and timelines of the related contract (for example, performance goals are achieved, Uniform Data System (UDS) data are submitted by appropriate deadlines, funds are used for authorized purposes).

Site Visit Team Methodology

- Review sample of two to three reports or records from contractors, in particular those related to contracts for health center clinical services.

Site Visit Findings

5. Based on the review of the sample, does the health center have access to records and reports as necessary to oversee contractor performance?

☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________
Element e: HRSA Approval for Contracting Substantive Programmatic Work

If the health center has arrangements with a contractor to perform substantive programmatic work, the health center requested and received prior approval from HRSA as documented by:

- An approved competing continuation/renewal of designation application or other competitive application, which included such an arrangement; or
- An approved post-award request for such arrangements submitted within the project period (for example, change in scope).

Site Visit Team Methodology

- Interview key management or other health center staff involved in procurement or contract oversight.
- Review the documentation identified by the health center that includes HRSA’s approval of the contracting arrangement for substantive programmatic work.
- Review complete list of all contracts for goods or services for procurement actions that were $25,000 or more and include costs directly attributable to the federal Health Center Program award (not applicable to look-alikes and as applicable for awardees).

Site Visit Findings

6. Based on the list of contracts reviewed and interview(s) with health center staff, does this health center currently contract with a single entity for the majority of health care providers (i.e., substantive programmatic work)?
   □ YES □ NO

7. If Yes: Was the health center able to produce documentation of prior approval by HRSA (i.e., arrangement was included in the last approved Service Area Competition (SAC) application or was approved through a separate post-award request)?
   □ YES □ NO □ NOT APPLICABLE

If No, an explanation is required:

______________________________________________________________________

54 For the purposes of the Health Center Program, contracting for substantive programmatic work applies to contracting with a single entity for the majority of health care providers. The acquisition of supplies, material, equipment, or general support services is not considered programmatic work.
Element f: Required Contract Provisions

The health center’s contracts that support the HRSA-approved scope of project include provisions that address the following:

- The specific activities or services to be performed or goods to be provided;
- Mechanisms for the health center to monitor contractor performance; and
- Requirements for the contractor to provide data necessary to meet the recipient’s applicable federal financial and programmatic reporting requirements, as well as provisions addressing record retention and access, audit, and property management.55

Site Visit Team Methodology

- Review health center’s Form 5A: Services.
- Review a sample of up to five final contracts, including Column II service contracts, that support the HRSA-approved scope of project, regardless of whether the costs of such contracts are directly attributable to the federal award (if applicable). Note: The same sample of contracts utilized for reviewing other program requirement areas may also be used for this sample.

Site Visit Findings

8. Does the health center provide one or more Required or Additional Services via Column II: Formal Written Contracts/Agreements?
   ☐ YES ☐ NO

9. If Yes: Based on the sample of contracts reviewed, do these contracts contain provisions that address the following areas:

   ◦ Specific activities or services to be performed or goods to be provided by the contractor?
     ☐ YES ☐ NO ☐ NOT APPLICABLE

   ◦ How the health center will monitor contract performance?
     ☐ YES ☐ NO ☐ NOT APPLICABLE

   ◦ Data reporting expectations and intervals for such reporting?
     ☐ YES ☐ NO ☐ NOT APPLICABLE

   ◦ Provisions for record retention and access, audit, and property management?
     ☐ YES ☐ NO ☐ NOT APPLICABLE

If No was selected for any of the above, an explanation is required:

55 For further guidance on these requirements, please see the HHS Grants Policy Statement, at http://www.hrsa.gov/grants/hhsgrantspolicy.pdf.
Subawards: Monitoring and Management

Element g: HRSA Approval to Subaward

*NOT APPLICABLE FOR LOOK-ALIKES*56

If the health center has made a subaward, the health center requested and received prior approval from HRSA as documented by:

- An approved competing continuation/renewal of designation application or other competitive application, which included the subrecipient arrangement; or
- An approved post-award request for such subrecipient arrangements submitted within the project period (for example, change in scope).

Site Visit Team Methodology

- Review Form 8: Health Center Agreements.
- Review most recent annual audit and management letters to determine if subrecipients were identified in the audit report, including the amount of the subawards.
- Review all subrecipient agreements.
- Review the documentation identified by the health center that includes HRSA’s approval of the subrecipient arrangement.

Site Visit Findings

10. Has the health center made any subawards (new or continuing) during the current Project Period?
   □ YES □ NO

11. Was the health center able to produce documentation of prior approval by HRSA of the subrecipient arrangement (i.e., arrangement was included in the last approved SAC application or was approved through a separate post-award request)?
   □ YES □ NO □ NOT APPLICABLE

   If No, an explanation is required:

   ________________________________________________________________________________________________

56 Because look-alikes do not receive federal funding under section 330 of the PHS Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.
Element h: Subaward Agreement

**NOT APPLICABLE FOR LOOK-ALIKES**

The health center’s subaward(s) that supports the HRSA-approved scope of project include provisions that address the following:

- The specific portion of the HRSA-approved scope of project to be performed by the subrecipient;
- The applicability of all Health Center Program requirements to the subrecipient;
- The applicability to the subrecipient of any distinct statutory, regulatory, and policy requirements of other Federal programs associated with their HRSA-approved scope of project;
- Mechanisms for the health center to monitor subrecipient compliance and performance;
- Requirements for the subrecipient to provide data necessary to meet the health center’s applicable federal financial and programmatic reporting requirements, as well as provisions addressing record retention and access, audit, and property management;
- Requirements that all costs paid for by the federal subaward are allowable consistent with Federal Cost Principles.

**Site Visit Team Methodology**

- Review all subrecipient agreements.

**Site Visit Findings**

12. Does the health center’s subrecipient agreement(s) include provisions that address the following:

- The portion of the health center project that will be carried out by the subrecipient (i.e., sites, services provided) and how?
  - [ ] YES  [ ] NO  [ ] NOT APPLICABLE

- All Health Center Program requirements applying to the subrecipient?
  - [ ] YES  [ ] NO  [ ] NOT APPLICABLE

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57 Because look-alikes do not receive federal funding under section 330 of the PHS Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.

58 Subrecipients are generally eligible to receive Federally Qualified Health Center reimbursement under Medicaid and Medicare, 340B Drug Pricing, and Federal Tort Claims Act coverage. However, such benefits are not automatically conferred and may require additional actions and approvals (e.g., submission and approval of a subrecipient deeming application).


60 See 45 CFR 75 Subpart E: Cost Principles.
The applicability of any other distinct statutory, regulatory and policy requirements of associated programs and benefits (e.g., requirements that will apply if the subrecipient participates in the 340B Drug Pricing Program)?
☐ YES ☐ NO ☐ NOT APPLICABLE

Mechanisms for the health center to monitor subrecipient compliance and performance?
☐ YES ☐ NO ☐ NOT APPLICABLE

The data the subrecipient must collect and report back to the awardee (e.g., UDS data)?
☐ YES ☐ NO ☐ NOT APPLICABLE

Record retention and access, audit, and property management (if applicable); and
☐ YES ☐ NO ☐ NOT APPLICABLE

Requirements that all costs paid for under the subaward are consistent with Federal Cost Principles?
☐ YES ☐ NO ☐ NOT APPLICABLE

If No was selected for any of the above, an explanation is required:
______________________________________________________________________

Element i: Subrecipient Monitoring

**NOT APPLICABLE FOR LOOK-ALIKES**

The health center monitors the activities of its subrecipient to ensure that the subaward is used for authorized purposes and that the subrecipient maintains compliance with all applicable requirements specified in the Federal award (including those found in section 330 of the Public Health Service (PHS) Act, implementing program regulations and grants regulations in 45 CFR Part 75). Specifically, the health center’s monitoring of the subrecipient includes:

- Reviewing financial and performance reports required by the health center in order to ensure performance goals are achieved, UDS data are submitted by appropriate deadlines, and funds are used for authorized purposes;
- Ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the health center subaward that may be identified through audits, on-site reviews, and other means; and
- Issuing a management decision for audit findings pertaining to the subaward.

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**NOT APPLICABLE FOR LOOK-ALIKES**

Because look-alikes do not receive federal funding under section 330 of the PHS Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.

**Per 45 CFR 75.521**, the management decision [issued by the health center to the subrecipient] must clearly state whether or not the audit finding is sustained, the reasons for the decision, and the expected auditee action to repay disallowed costs, make financial adjustments, or take other action.
Site Visit Team Methodology

- Review all subrecipient agreements.
- Review documentation of subrecipient monitoring.
- Review sample of financial and performance reports received from the subrecipient.
- Interview health center staff that provide oversight of subrecipient activities.

Site Visit Findings

13. Does the health center monitor the activities of the subrecipient to ensure the subrecipient maintains compliance with all Health Center Program requirements and all other applicable requirements specified in the Federal award?
   ☐ YES ☐ NO ☐ NOT APPLICABLE
   If No, an explanation is required:
   ____________________________________________________________

14. Does the health center receive and review financial and performance reports in order to ensure:
   ◦ Performance goals are achieved?
     ☐ YES ☐ NO ☐ NOT APPLICABLE
   ◦ UDS data are submitted by appropriate deadlines?
     ☐ YES ☐ NO ☐ NOT APPLICABLE
   ◦ Funds are used for authorized purposes?
     ☐ YES ☐ NO ☐ NOT APPLICABLE
   If No was selected for any of the above, an explanation is required:
   ____________________________________________________________

15. Does the health center have a process for ensuring that the subrecipient takes timely and appropriate action on deficiencies that may be identified through audits, on-site reviews, or other means (including issuing a management decision for audit findings pertaining to the subaward)?
   ☐ YES ☐ NO ☐ NOT APPLICABLE
   If No, an explanation is required:
   ____________________________________________________________
Element j: Retention of Subaward Agreements and Records

*NOT APPLICABLE FOR LOOK-ALIKES*\(^{63}\)

The health center retains final subrecipient agreements and related records, consistent with federal document maintenance requirements.\(^{64}\)

**Site Visit Team Methodology**

- Review all subrecipient agreements.
- Review documentation of subrecipient monitoring.
- Review sample of financial and performance reports received from the subrecipient.

**Site Visit Team Findings**

16. Was the health center able to produce final (executed) subrecipient agreements that have been awarded within the past three years and related financial and other performance records?

  ☐ YES ☐ NO ☐ NOT APPLICABLE

If No, an explanation is required:

____________________________________________________________________

\(^{63}\) Because look-alikes do not receive federal funding under section 330 of the PHS Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.

\(^{64}\) See 45 CFR 75.361 for HHS retention requirements for records.
CONFLICT OF INTEREST

**Primary Reviewer:** Fiscal Expert  
**Secondary Reviewer:** Governance/Administrative Expert

**Authority:** Section 330(a)(1) and 330(k)(3)(D) of the PHS Act; 42 CFR 51c.113 and 42 CFR 56.114; and 45 CFR 75.327

### Document Checklist for Health Center Staff

**Documents Provided Prior to Site Visit:**

- Procedures for purchasing and procurement, including, if applicable or separate, procedures for contracting and contract management
- Two most recent annual audits and management letters

**Documents Provided at the Start of the Site Visit:**

- Documentation containing the health center’s standards of conduct (e.g., articles of incorporation, bylaws, board manual, employee manual, policies and procedures, disclosure forms)
- Sample of written disclosures with respect to real or apparent conflicts of interest completed by officers, employees, board members and agents of the health centers (e.g., forms, signed statements, employment contracts)
- Sample of supporting documentation for one to two procurements supported with federal funds from the past 3 years (can be same sample as used for Contracts and Subawards)
- Agreements with parent corporation, affiliate, subsidiary, or subrecipient organization (if applicable)

### Demonstrating Compliance

**Element a: Standards of Conduct**

**NOT APPLICABLE FOR LOOK-ALIKES**

The health center has and implements written standards of conduct that apply, at a minimum, to its procurements paid for in whole or in part by the Federal award. Such standards:

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65 Because look-alikes do not receive federal funding under section 330 of the PHS Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.
• Apply to all health center employees, officers, board members and agents\(^{66}\) involved in the selection, award, or administration of such contracts;
• Require written disclosure of real or apparent conflicts of interest;
• Prohibit individuals with real or apparent conflicts of interest with a given contract from participating in the selection, award, or administration of such contract\(^{67}\);
• Restrict health center employees, officers, board members and agents involved in the selection, award, or administration of contracts from soliciting or accepting gratuities, favors, or anything of monetary value for private financial gain from such contractors or parties to sub-agreements (including subrecipients or affiliate organizations);\(^{68}\) and
• Enforce disciplinary actions on health center employees, officers, board members, and agents for violating these standards.

Site Visit Team Methodology

- Review relevant documents where standards of conduct relative to procurement are contained.
- Review sample of written disclosures with respect to real or apparent conflicts of interest completed by officers, employees, board members and agents of the health center.

Site Visit Findings

1. Was the health center able to provide document(s) that contain its written standards of conduct for the selection, award and administration of contracts that, at a minimum, apply to its procurements paid for in whole or in part by the Federal award?
   ☐ YES ☐ NO

   If No, an explanation is required:
   __________________________________________________________________

2. Do these written standards of conduct:
   ◦ Apply to all health center employees, officers, board members and agents?
     ☐ YES ☐ NO ☐ NOT APPLICABLE
   ◦ Require disclosure of any real or apparent conflicts of interest?
     ☐ YES ☐ NO ☐ NOT APPLICABLE
   ◦ Prohibit individuals with a real or apparent conflict of interest with a given contract from participating in the selection, award, or administration of such contract?
     ☐ YES ☐ NO ☐ NOT APPLICABLE

\(^{66}\) An agent of the health center includes, but is not limited to, a governing board member, an employee, officer, or contractor acting on behalf of the health center.
\(^{67}\) This includes, but is not limited to, prohibiting board members that are employees or contractors of a subrecipient of the health center from participating in the selection, award, or administration of that subaward. This also includes prohibiting board members who are employees of an organization that contracts with the health center from participating in the selection, award, or administration of that contract.
\(^{68}\) Health centers may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.
Element b: Standards for Organizational Conflicts of Interest

If the health center has a parent, affiliate, or subsidiary that is not a State, local government, or Indian tribe, the health center has and implements written standards of conduct covering organizational conflicts of interest⁶⁹ that might arise when conducting a procurement action involving a related organization. These standards of conduct require:

- Written disclosure of conflicts of interest that arise in procurements from a related organization; and
- Avoidance and mitigation of any identified actual or apparent conflicts during the procurement process.

Site Visit Team Methodology

- Review agreements with parent corporation, affiliates, subsidiaries, and subrecipients (if applicable).
- Review two most recent annual audits and management letters for any references to related party transactions.

Site Visit Findings

4. Does the health center have a parent, affiliate or subsidiary that is not a State, local government, or Indian tribe?
   ☐ YES ☐ NO

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⁶⁹ Organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, the health center is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. See: 45 CFR 75.327(c)(2).
5. **If Yes:** Was the health center able to provide document(s) that contain its written standards of conduct for the selection, award and administration of contracts that involve the related party or organization?

   ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   If No, an explanation is required:

   ___________________________________________________________________

6. Do the health center’s organizational conflict of interest standards prevent or mitigate any identified or apparent conflicts of interest?

   ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   If No, an explanation is required:

   ___________________________________________________________________

**Element c: Dissemination of Standards of Conduct**

The health center has mechanisms or procedures for informing its employees, officers, board members, and agents of the health center’s standards of conduct covering conflicts of interest, including organizational conflicts of interest, and for governing its actions with respect to the selection, award and administration of contracts.

**Site Visit Team Methodology**

- Review documentation containing the health center’s standards of conduct, including, if applicable, those covering organizational conflict of interest.
- Review sample of written disclosures with respect to real or apparent conflicts of interest completed by officers, employees, board members and agents of the health centers.
- Interview health center Project Director/CEO, board member(s) and other relevant staff involved in procurement and/or HR regarding mechanisms or procedures for informing employees, officers, board members, and agents of the health center’s standards of conduct.

**Site Visit Findings**

*In responding to the question below, please note:*

For look-alikes, the question(s) under this element are applicable ONLY for those look-alikes that have a parent, affiliate, or subsidiary that is not a State, local government, or Indian tribe as identified in the assessment of element “b.” If a look-alike has a parent, affiliate, or subsidiary that is a State, local government, or Indian tribe as identified in the assessment of element “b,” select “Not Applicable” in answer to the question(s) under this element.

7. Does the health center inform employees, officers, board members, and agents of its conflict of interest standards of conduct?

   ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   If No, an explanation is required:

   ___________________________________________________________________
Element d: Adherence to Standards of Conduct

In cases where a conflict of interest was identified, the health center’s procurement records document adherence to its standards of conduct (for example, an employee whose family member was competing for a health center contract was not permitted to participate in the selection, award, or administration of that contract).

Site Visit Team Methodology

- Review sample of supporting documentation for one to two procurement actions supported by federal funds in the past 3 years.
- Review audits and management letters for any findings related to conflicts of interest.

Site Visit Findings

In responding to the questions below, please note:

For look-alikes, the question(s) under this element are applicable ONLY for those look-alikes that have a parent, affiliate, or subsidiary that is not a State, local government, or Indian tribe as identified in the assessment of element “b”. If a look-alike has a parent, affiliate, or subsidiary that is a State, local government, or Indian tribe as identified in the assessment of element “b,” select “Not Applicable” in answer to the question(s) under this element.

8. Were any conflicts of interest (real or apparent), including organizational conflicts of interest, identified in the past 3 years that were associated with procurement involving Federal funds?
   ☐ YES ☐ NO ☐ NOT APPLICABLE

9. If Yes: Was the health center able to produce documentation that it adhered to its standards of conduct related to the identified conflict(s) of interest?
   ☐ YES ☐ NO ☐ NOT APPLICABLE

If No, an explanation is required:
COLLABORATIVE RELATIONSHIPS

Primary Reviewer: Governance/Administrative Expert
Secondary Reviewer: Clinical Expert

Authority: Section 330(k)(3)(B) of the PHS Act; and 42 CFR 51c.303(n), 42 CFR 56.303(n), and 42 CFR 51c.305(h)

Document Checklist for Health Center Staff

Documents Provided at the Start of the Site Visit:

☐ Documentation (e.g., memoranda of agreement (MOAs) or memoranda of understanding (MOUs), letters, monthly collaboration meeting agendas with health center leaders, cross-referral of patients between health centers, evidence of membership on a city-wide community health planning council) of established collaboration with other providers and organizations in the health center’s service area, including local hospitals, specialty providers, and social service organizations, to provide access to services not available through the health center

☐ Documentation of coordination efforts with other federally-funded, state, and local health services delivery projects and programs serving similar patient populations in the service area. At a minimum, this includes documentation of efforts to establish coordination with one or more health centers in the service area (e.g., email or other correspondence of requests and responses for coordination)

Demonstrating Compliance

Element a: Coordination and Integration of Activities

The health center documents its efforts to collaborate with other providers or programs in the service area, including local hospitals, specialty providers, and social service organizations (including those that serve special populations), to provide access to services not available through the health center in order to support:

- Reductions in the non-urgent use of hospital emergency departments;
- Continuity of care across community providers; and
- Access to other health or community services that impact the patient population.

Site Visit Team Methodology

- Interview Project Director/CEO regarding collaboration activities, including example(s) of how the health center’s collaborative relationship(s) supports each of the following:
  - Reductions in the non-urgent use of hospital emergency departments;
  - Continuity of care across community providers; and
- Access to other health or community services that impact the patient population.
- Review Collaboration section and any relevant attachments from most recent Service Area Competition (SAC) and other awards (e.g., New Access Point).
- Review sample of MOUs, MOAs and any other documentation of collaboration with other community providers or organizations, including local hospitals, specialty providers, and social service organizations (including those that serve special populations).

Site Visit Findings

1. Does the health center make efforts to collaborate with other providers or programs in the service area, specifically local hospitals, specialty providers, and social service organizations (including those that serve special populations), to provide access to services not available through the health center?  
☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

2. Was the health center able to provide at least one example of how its collaborative relationship(s) supports each of the following:
   - Reductions in the non-urgent use of hospital emergency departments;
   - Continuity of care across community providers; and
   - Access to other health or community services that impact the patient population?
☐ YES  ☐ NO

If No, an explanation is required:
______________________________________________________________________

Element b: Collaboration with Other Primary Care Providers

The health center documents its efforts to coordinate and integrate activities with other federally-funded, as well as State and local, health services delivery projects and programs serving similar patient populations in the service area (at a minimum, this would include establishing and maintaining relationships with other health centers in the service area).

Site Visit Team Methodology

- Review Uniform Data System (UDS) Mapper to identify other health centers with sites in the service area.
- Interview health center Project Director/CEO regarding coordination with other federally-funded, state, and local health services delivery projects and programs serving similar patient populations in the service area (at a minimum, other health centers in the service area).
- Review relevant documentation of efforts to coordinate or documentation of established coordination.
Site Visit Findings

3. Does the health center make efforts to coordinate and integrate with other federally-funded, state, and local health services delivery projects and programs serving similar patient populations in the service area?
   □ YES    □ NO

   If No, an explanation is required, including stating if there are no other health centers or primary care providers in the service area:

______________________________________________________________________

4. Was the health center able to describe established relationships with at least one health center in the service area?
   □ YES    □ NO

   If No, an explanation is required, including stating if there are no other health centers or primary care providers in the service area:

______________________________________________________________________

Element c: Expansion of HRSA-Approved Scope of Project

If the health center expands\textsuperscript{70,71} its HRSA-approved scope of project:

- The health center obtains letters or other appropriate documents specific to the request or application that describe areas of coordination or collaboration with health care providers serving similar patient populations in the service area (health centers, rural health clinics, local hospitals including critical access hospitals, health departments, other providers including specialty providers, as applicable); or
- If such letters or documents cannot be obtained from these providers, the health center documents its attempts to coordinate or collaborate with these health care providers (health centers, rural health clinics, local hospitals including critical access hospitals, health departments, other providers including specialty providers, as applicable) on the specific request or application proposal.

Site Visit Team Methodology

\textbf{N/A} – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of change in scope requests and/or competing applications. No onsite review of this element is required.

\textsuperscript{70} Expanding the HRSA-approved scope of project may occur by adding sites or services through change in scope requests, New Access Point competitive applications, or other supplemental funding applications.

\textsuperscript{71} Additional requirements for documented collaboration may apply based on specific Notices of Funding Opportunity (NOFOs), Notices of Award (NOAs), look-alike designation instructions, or other federal statutes, regulations, or policies.
Site Visit Findings

**N/A** – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of change in scope requests and/or competing applications. No onsite review of this element is required.
FINANCIAL MANAGEMENT AND ACCOUNTING SYSTEMS

Primary Reviewer: Fiscal Expert
Secondary Reviewer: Governance/Administrative Expert

Authority: Sections 330(e)(5)(D), 330(k)(3)(D), 330(k)(3)(N), and 330(q) of the PHS Act; 42 CFR 51c.113, 42 CFR 56.114, 42 CFR 51c.303(d), and 42 CFR 56.303(d); and 45 CFR Part 75 Subparts D, E and F

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

- Financial management and internal control procedures (may also be in the form of financial/accounting policies, manuals or other related documents)
- Procedures for drawdown, disbursement and expenditure of federal award funds (may be included in the financial management and internal control procedures or may be separate)
- Policies and/or procedures that govern and track the use of non-grant funds (if applicable)
- Two most recent annual audits and management letters

Documents Provided at the Start of the Site Visit:

- Manuals or documentation of the financial management system(s) used by the health center (e.g., financial accounting software, practice management system). Note: Some or all of the financial management system(s) may be contracted out or carried out via a Health Center Controlled Network
- Sample of periodic financial reports provided to the board and key management staff (selected from the past 6 months) including the most recent interim financial statements
- Sample of source documentation (e.g., financial records, receipts, invoices) to support expenditures made under the federal Health Center Program award for the last quarter
- Aged Accounts Receivable (as of most recent interim financial statements)
- Aged Accounts Payable (as of most recent interim financial statements)

Demonstrating Compliance

Element a: Financial Management and Internal Control Systems

The health center has and utilizes a financial management and internal control system that reflects Generally Accepted Accounting Principles (GAAP) for private non-profit health centers
or Government Accounting Standards Board (GASB) principles for public agency health centers\textsuperscript{72} and that ensures at a minimum:

- Health center expenditures are consistent with the HRSA-approved total budget\textsuperscript{73} and with any additional applicable HRSA approvals that have been requested and received;\textsuperscript{74}
- Effective control over, and accountability for, all funds, property, and other assets associated with the Health Center Program project;
- The safeguarding of all assets to assure they are used solely for authorized purposes in accordance with the terms and conditions of the Health Center Program award/designation;\textsuperscript{75} and
- The capacity to track the financial performance of the health center, including identification of trends or conditions that may warrant action by the organization to maintain financial stability.

**Site Visit Team Methodology**

- Interview health center’s CFO and/or other relevant staff and, if applicable, contractors who have responsibility for the health center’s financial management systems.
- Review the two most recent audits and management letters.
- Review financial management, accounting, and internal control procedures and systems.
- Review sample of periodic financial reports provided to the board and key management staff including the most recent interim financial statements.
- Review Aged Accounts Receivable and Aged Accounts Payable.

**Site Visit Findings**

1. Does the health center’s financial management and internal control system reflect GAAP or GASB principles?
   - [ ] YES
   - [ ] NO

   If No, an explanation is required:

   ____________________________

\textsuperscript{72} GAAP and GASB are used as defined in 45 CFR Part 75.

\textsuperscript{73} A health center’s “total budget” includes the Health Center Program federal award funds and all other sources of revenue in support of the HRSA-approved health center scope of project. For additional detail, please see Health Center Program Compliance Manual, Chapter 17: Budget.

\textsuperscript{74} Per 45 CFR 75.308, post-award, federal award recipients are required to report significant deviations from budget or project scope or objective, and are required to request prior approvals from HHS awarding agencies for budget and program plan revisions (re-budgeting). “Re-budgeting, or moving funds between direct cost budget categories in an approved budget, is considered significant when cumulative transfers for a single budget period exceeds 25 percent of the total approved budget (inclusive of direct and indirect costs and federal funds and required matching or cost sharing). The base used for determining significant re-budgeting excludes carryover balances but includes any amounts awarded as supplements.”

\textsuperscript{75} The requirement to safeguard federal assets as described in this bullet substantially reflects the requirement to have written policies and procedures in place to ensure the appropriate use of federal funds in compliance with applicable federal statutes, regulations, and the terms and conditions of the federal award. See Section 330(k)(3)(N) of the Public Health Service Act.
2. Is the health center able to track actual expenditures in comparison to the Health Center Program project budget?

☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

3. Do the health center’s financial management and internal control systems have the capacity to account for the expenditure of Health Center Program project funds (e.g., segregation of duties) and safeguard the use of associated assets and property (e.g., procedures for inventory management, maintaining property records)?

☐ YES ☐ NO

If No, an explanation is required regarding the health center’s inability to account for expenditures and/or safeguard assets:
______________________________________________________________________

4. Was the health center able to demonstrate a capacity to track its financial performance for the purposes of monitoring financial stability?

☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

Element b: Documenting Use of Federal Funds

**NOT APPLICABLE FOR LOOK-ALIKES**

The health center’s financial management system is able to account for all Federal award(s) (including the Federal award made under the Health Center Program) in order to identify the source (receipt) and application (expenditure) of funds for federally-funded activities. Specifically, the health center’s financial records contain information and related source documentation pertaining to authorizations, obligations, unobligated balances, assets, expenditures, income, and interest under the Federal award(s).

**Site Visit Team Methodology**

- Have CFO or other financial staff walk through the health center’s use of the last quarter of federal Health Center Program award funds, starting from drawdown through obligation and payment of such funds for authorized expenditure.

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76 Because look-alikes do not receive federal funding under section 330 of the Public Health Service (PHS) Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.

77 Federal program and federal award identification would include, as applicable, the Catalog of Federal Domestic Assistance (CFDA) title and number, federal award identification number and year, name of the HHS awarding agency, and name of the pass-through entity, if any.
- Review sample of source documentation to support expenditures made under the federal Health Center Program award for the last quarter.

Site Visit Findings

5. Based on the sample, does the health center have a financial management system that is able to account for the Health Center Program Federal award and related expenditures (e.g., in chart of accounts) made under the award? Specifically, do the health center’s financial records contain relevant information and related source documentation?

☐ YES ☐ NO

If No, an explanation is required:

__________________________________________________________

Element c: Drawdown, Disbursement and Expenditure Procedures

NOT APPLICABLE FOR LOOK-ALIKES

The health center has written procedures for:

- Drawing down Federal award funds in a manner that minimizes the time elapsing between the transfer of the Federal award funds from HRSA and the disbursement of these funds by the health center; and
- Assuring that expenditures of Federal award funds are allowable in accordance with the terms and conditions of the Federal award and with the Federal Cost Principles in 45 CFR Part 75 Subpart E.

Site Visit Team Methodology

- Review health center’s procedures for drawdown, disbursement and expenditure of federal award funds utilizing the federal Payment Management System (PMS).
- Interview CFO or other health center individuals authorized to draw down and expend federal award funds.

Site Visit Findings

6. Does the health center have written procedures for utilizing the Federal PMS that, at a minimum, require that the drawdown of funds is completed in a manner that minimizes the time elapsed between the transfer of the Federal award funds from HRSA and the disbursement of these funds?

☐ YES ☐ NO

__________________________________________________________

78 Because look-alikes do not receive federal funding under section 330 of the PHS Act, any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.

79 The cost principles are set forth in 45 CFR Part 75, Subpart E.
If No, an explanation is required:
______________________________________________________________________

7. Do the health center’s written procedures contain provisions for ensuring that all expenditures of Federal award funds are allowable in accordance with:
   - The terms and conditions of the Federal award, including those that limit the use of Federal award funds?
     ☐ YES ☐ NO
   - The Federal Cost Principles in 45 CFR Part 75 Subpart E?
     ☐ YES ☐ NO

If No was selected for any of the above, an explanation is required:
______________________________________________________________________

Element d: Submitting Audits and Responding to Findings

If a health center expends $750,000 or more in award funds from all federal sources during its fiscal year, the health center ensures a single or program-specific audit is conducted and submitted for that year in accordance with the provisions of 45 CFR Part 75, Subpart F: Audit Requirements and ensures that subsequent audits demonstrate corrective actions have been taken to address all findings, questioned costs, reportable conditions, and material weaknesses cited in the previous audit report, if applicable.

Site Visit Team Methodology

- Review most recent audit and management letter.
- If there are any audit findings, questioned or unallowable costs, reportable conditions, material weaknesses or significant deficiencies noted, interview the health center’s CFO and/or other relevant health center individuals regarding status of corrective actions.

Site Visit Findings

8. Did the health center expend $750,000 or more in Federal award funds during its last complete fiscal year?
   ☐ YES ☐ NO

9. If Yes: Has (i.e., audit is complete at the time of site visit) or will (i.e., audit is in progress at the time of site visit) the health center ensure an audit is conducted in accordance with Federal audit requirements?
   ☐ YES ☐ NO ☐ NOT APPLICABLE

If No, an explanation is required:
______________________________________________________________________
10. Based on review of the most recent audit and management letter, were there any findings, questioned or unallowable costs, reportable conditions, material weaknesses or significant deficiencies, including any cited in the previous audit report?
☐ YES  ☐ NO

11. If Yes: Has the health center either completed corrective actions to address the finding(s) or was the health center able to document steps it is currently taking to address the finding(s)?
☐ YES  ☐ NO  ☐ NOT APPLICABLE

If No, an explanation is required:
____________________________________________________________________

Element e: Documenting Use of Non-Grant Funds

The health center can document that any non-grant funds generated from health center activities, in excess of what is necessary to support the HRSA-approved total health center project budget, were utilized to further the objectives of the project by benefiting the current or proposed patient population and were not utilized for purposes that are specifically prohibited by the Health Center Program.

Site Visit Team Methodology

- Interview the health center’s CFO and/or Project Director/CEO or other relevant health center individuals.
- Review policies, procedures or systems that govern and track the use of non-grant funds (if applicable).

Site Visit Findings

12. In the last complete fiscal year, did the health center generate revenue from health center activities that was then utilized for activities outside the scope of the project?
☐ YES  ☐ NO

13. If Yes: Was the health center able to document that these funds were used:

- To support activities that benefit the current patient population?
  ☐ YES  ☐ NO  ☐ NOT APPLICABLE

- For purposes that are not specifically prohibited by the Health Center Program?
  ☐ YES  ☐ NO  ☐ NOT APPLICABLE

If No was selected for any of the above, an explanation is required:
____________________________________________________________________
BILLING AND COLLECTIONS

Primary Reviewer: Fiscal Expert
Secondary Reviewer: Governance/Administrative Expert (as needed)

Authority: Section 330(k)(3)(E), (F), and (G) of the PHS Act; and 42 CFR 51c.303(e), (f), and (g) and 42 CFR 56.303(e), (f), and (g)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Registration, Eligibility, Outreach and Enrollment Procedures
☐ Current Fee Schedule for each service area (medical, dental, behavioral health, etc.)
☐ Billing and Collections policies or procedures and systems including:
  ◦ provision(s) to waive or reduce fees owed by patients;
  ◦ third-party payor billing procedures and/or contracts;
  ◦ “refusal to pay” policy (if applicable); and
  ◦ procedures for notifying patients of additional costs for supplies and equipment related to, but not included in the service (if applicable)
☐ List of provider and program/site billing numbers for Medicare, Medicaid and CHIP or any other documentation of participation (e.g., individual provider NPIs)

Documents Provided at the Start of the Site Visit:

☐ Current data on the following metrics: collection ratios, bad debt write off as a percentage of total billing, collections per visit, charges per visit, percentage of A/R less than 120 days, days in A/R (for context on billing and collections efforts)
☐ Collection rate by payor source (Medicaid, CHIP, Medicare, and, as applicable, other public and private insurance) gathered from billing records for the past 1-2 years
☐ Sample of billing and payment records for charges requested from patients. For the sample, randomly choose 5 records for patient visits from across at least 3 unique services (e.g., routine primary care, preventive dental, behavioral health, OB) for a total of at least 15 total records reviewed:
  ◦ Ensure the sample includes patients that are eligible for the health center’s sliding fee discount program (i.e., incomes at or below 200 percent of the Federal Poverty Guidelines (FPG))
  ◦ If applicable, include records for patients that are not eligible for the sliding fee discount program (i.e., incomes above 200 percent FPG)
☐ Sample of two to three billing records where patient fees were waived or reduced
☐ Documentation of methods for notifying patients of additional costs for supplies and equipment related to, but not included in the service (if applicable)
☐ Documentation of cases where the health center has applied its refusal-to-pay policy within the past 2 years (if applicable)
Element a: Fee Schedule for In-Scope Services

The health center has a fee schedule for services that are within the HRSA-approved scope of project and are typically billed for in the local health care market.

Site Visit Team Methodology
- Review fee schedule(s).
- Compare the health center fee schedule to Form 5A required and additional services.
- Interview CFO/financial or billing staff.
- Review most recent data and documentation of analysis used for determining and setting fees.

Site Visit Findings

1. Does the fee schedule include fees for all in-scope services typically billed for in the local health care market?

   Note: Services on Form 5A that are not billed for in the local health care market may be excluded from the health center’s fee schedule (e.g., transportation, translation, other non-clinical services).

   □ YES  □ NO

   If No, an explanation is required:

Element b: Basis for Fee Schedule

The health center uses data on locally prevailing rates and actual health center costs to develop and update its fee schedule.

Site Visit Team Methodology
- Review fee schedule(s).
- Compare the health center fee schedule to Form 5A required and additional services.
- Interview CFO/financial or billing staff.
- Review most recent data and documentation of analysis used for determining and setting fees.

Site Visit Findings

2. Did the health center use data on locally prevailing rates and actual health center costs to develop its current fee schedule(s)?
   - YES  - NO
   If No, an explanation is required:

Element c: Participation in Insurance Programs

The health center participates in Medicaid, CHIP, Medicare, and, as appropriate, other public or private assistance programs or health insurance.

Site Visit Team Methodology

- Review list of provider and program/site billing numbers or any other documentation of participation in Medicare, Medicaid and CHIP.
- Review documentation (if applicable) of participation in other public or private program or health insurance plans.
- Interview CFO/financial or billing staff.

Site Visit Findings

3. Does the health center have documentation of its participation in Medicaid, CHIP, and Medicare?
   - YES  - NO
   If No, an explanation is required:

4. Does the health center participate in other public or private assistance programs or health insurance?
   - YES  - NO
   If No, an explanation is required, including the justification that the health center provided as to why it does not participate in any other programs or insurance plans:

Element d: Systems and Procedures

The health center has systems, which may include operating procedures, for billing and collections that address:
• Educating patients on insurance and related third-party coverage options available to them (if applicable);
• Billing Medicare, Medicaid, CHIP, and other public and private assistance programs or insurance in a timely manner, as applicable;\textsuperscript{80} and
• Requesting applicable payments from patients, while ensuring that no patient is denied service based on inability to pay.

Site Visit Team Methodology

- Interview staff involved in the billing and collections process as well as staff involved in educating patients on insurance options (e.g., front desk staff, billing office staff, outreach and enrollment staff).
- Review billing and collections systems including third-party payor billing procedures and/or contracts.
- Review contracts with outside organizations that conduct billing or collections on behalf of the health center (if applicable).
- Review eligibility, education and, if applicable, enrollment procedures (e.g., new patient registration and screening procedures).

Site Visit Findings

5. Was the health center able to provide at least one example of how it educates patients on the availability of insurance coverage options?
   \(\square\) YES \(\square\) NO
   
   If No, an explanation is required:

6. Does the health center have systems in place for billing Medicare, Medicaid, CHIP and other public and private assistance programs or insurance?
   \(\square\) YES \(\square\) NO
   
   If No, an explanation is required:

7. Does the health center have a system(s) in place for collecting balances owed by patients?
   \(\square\) YES \(\square\) NO
   
   If No, an explanation is required:

\textsuperscript{80} For information on Federal Tort Claims Act (FTCA) coverage in cases where health centers are using alternate billing arrangements in which the covered provider is billing directly for services provided to covered entity patients, please refer to the \textit{FTCA Health Center Policy Manual}, Section I: E. Coverage Under Alternate Billing Arrangements.
8. When requesting payment(s) from patients, do the health center’s billing and collections systems/procedures ensure that no patient is denied service based on inability to pay?
☐ YES  ☐ NO

If Yes OR No, an explanation is required, including describing the systems or procedures:
______________________________________________________________________

Element e: Procedures for Additional Billing or Payment Options

If a health center elects to offer additional billing options or payment methods (for example, payment plans, grace periods, prompt or cash payment incentives), the health center has operating procedures for implementing these options or methods and for ensuring they are accessible to all patients regardless of income level or sliding fee discount pay class.

Site Visit Team Methodology
- Review billing and collections systems and any related procedures for additional billing options or payment methods (if applicable).

Site Visit Findings

9. Does the health center offer additional billing options or payment methods (for example, payment plans, grace periods, prompt or cash payment incentives)?
☐ YES  ☐ NO

If Yes, an explanation is required specifying what additional billing options or payment methods are offered by the health center:
______________________________________________________________________

10. If Yes: Does the health center have operating procedures for implementing these options or methods?
☐ YES  ☐ NO  ☐ NOT APPLICABLE

If No, an explanation is required:
______________________________________________________________________

11. Does the health center ensure these options or methods are accessible to all patients regardless of income level or sliding fee discount pay class?
☐ YES  ☐ NO  ☐ NOT APPLICABLE

If No, an explanation is required:
______________________________________________________________________

Element f: Timely and Accurate Third Party Billing

The health center has billing records that show claims are submitted in a timely and accurate manner to the third party payor sources with which it participates (Medicaid, CHIP, Medicare,
and other public and private insurance) in order to collect reimbursement for its costs in providing health services\(^{81}\) consistent with the terms of such contracts and other arrangements.

**Site Visit Team Methodology**

- Review collection rate by payor source (Medicaid, CHIP, Medicare, and, as applicable, other public and private insurance) gathered from billing records for the past 1-2 years.
- Review third-party payor billing procedures.
- Interview CFO and staff involved in the billing and collections process.

**Site Visit Findings**

12. Do collection rates indicate that claims are submitted within 30 days of the service(s) provided?
   - [ ] YES
   - [ ] NO

   If No, an explanation is required:
   __________________________________________________________

13. Was the health center able to document that it corrects and resubmits claims that have been rejected due to accuracy?
   - [ ] YES
   - [ ] NO

   If No, an explanation is required, including specifying any cases in which Medicare, Medicaid or any other third party payor has suspended payments to the health center and why:
   __________________________________________________________

**Element g: Accurate Patient Billing**

The health center has billing records or other forms of documentation that reflect that the health center:

- Charges patients in accordance with its fee schedule and the sliding fee discount schedule (if applicable),\(^{82}\) and
- Makes reasonable efforts to collect such amounts owed from patients.

**Site Visit Team Methodology**

- Review fee schedule and the appropriate corresponding sliding fee discount schedule, including sliding fee schedules that differ by service (if applicable) (e.g., Dental Sliding Fee Discount Schedule).
- Review sample of billing and payment records for charges requested from patients.

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\(^{81}\) This includes services that the health center provides directly (Form 5A, Column I) or provides through a formal written contract/agreement (Form 5A, Column II).

\(^{82}\) See Health Center Program Compliance Manual, Chapter 9: Sliding Fee Discount Program for more information on the sliding fee discount schedule.
- Review billing and collections systems and any related procedures and interview staff involved in collections.

Site Visit Findings

14. Are patients billed for services in accordance with the health center’s fee schedule and are the correct discounts applied to these charges (if applicable)?
   □ YES    □ NO

   If No, an explanation is required:

   ________________________________________________________________

15. Does the health center attempt to collect amounts owed for charges, co-pays, nominal charges, or discounted fees (e.g., health center sends statements for outstanding balances, makes phone calls)?
   □ YES    □ NO

   If No, an explanation is required:

   ________________________________________________________________

Element h: Policies or Procedures for Waiving or Reducing Fees

The health center has and utilizes board-approved policies and operating procedures that include the specific circumstances when the health center will waive or reduce fees or payments required by the center due to any patient’s inability to pay.

Site Visit Team Methodology

- Review policies and procedures that contain provision(s) to waive or reduce fees owed by patients.
- Review a sample of two to three billing records where patient fees were waived or reduced.

Site Visit Findings

16. Does the health center have a provision(s) in policy and procedure that addresses circumstances or criteria related to a patient’s inability to pay (regardless of patient income level) to ensure that fees or payments will be waived or reduced?
   □ YES    □ NO

   If Yes OR No, an explanation is required, including specifying whether the health center waives or reduces fees or payments:

   ________________________________________________________________

17. Does the health center follow the provision(s) in its policies and procedures for waiving or reducing fees or payments?
   □ YES    □ NO    □ NOT APPLICABLE

   If No, an explanation is required:
Element i: Billing for Supplies or Equipment

If a health center provides supplies or equipment that are related to, but not included in, the service itself as part of prevailing standards of care\(^{83}\) (for example, eyeglasses, prescription drugs, dentures) and charges patients for these items, the health center informs patients of such charges ("out-of-pocket costs") prior to the time of service.\(^{84}\)

Site Visit Team Methodology

- Interview staff involved in billing.
- Review billing procedures and methods for notifying patients of additional costs for supplies and equipment related to but not included in the service (if applicable).

Site Visit Findings

18. Does the health center provide and charge patients for supplies and equipment related to but not included in the service itself (e.g., eyeglasses, dentures)?
   ☐ YES ☐ NO

19. If Yes: Does the health center have a method for notifying patients about "out of pocket" costs for such supplies and equipment, in advance of service provision?
   ☐ YES ☐ NO ☐ NOT APPLICABLE

   If No, an explanation is required:

Element j: Refusal to Pay Policy

If a health center elects to limit or deny services based on a patient’s refusal to pay, the health center has a board-approved policy that distinguishes between refusal to pay and inability to pay and notifies patients of:

- Amounts owed and the time permitted to make such payments;
- Collection efforts that will be taken when these situations occur (for example, meeting with a financial counselor, establishing payment plans); and
- How services will be limited or denied when it is determined that the patient has refused to pay.

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\(^{83}\) These items differ from supplies and equipment that are included in a service as part of prevailing standards of care and are reflected in the fee schedule (e.g., casting materials, bandages).

\(^{84}\) For related information on revenue generated from such charges, please see Health Center Program Compliance Manual, Chapter 15: Financial Management and Accounting Systems.
Site Visit Team Methodology

- Interview staff responsible for billing and collections.
- Review billing and collection policies and procedures.
- Review of refusal-to-pay policy (if applicable).
- Review documentation of cases where the health center has applied its refusal-to-pay policy within the past 2 years (if applicable).

Site Visit Findings

20. Does the health center limit or deny services to patients who refuse to pay?
   - ☐ YES  ☐ NO

21. **If Yes:** Does the health center have a refusal to pay policy?
   - ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   If No, an explanation is required:

______________________________________________________________________

22. Does the health center:

   ◦ Distinguish between refusal to pay and inability to pay?
     - ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   ◦ Notify patients of amounts owed and the time permitted to make such payments?
     - ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   ◦ Notify patients of collection efforts that will be taken when these situations occur (for example, meeting with a financial counselor, establishing payment plans)?
     - ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   ◦ Notify patients how services will be limited or denied when it is determined that the patient has refused to pay?
     - ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   If Yes OR No, an explanation is required, including specifying whether the health center has a policy or procedure that addresses these areas:

______________________________________________________________________

23. In cases where the health center has limited or denied services to a patient(s) due to refusal to pay, was the determination consistent with health center policy or procedure?
   - ☐ YES  ☐ NO  ☐ NOT APPLICABLE

   If Yes OR No, an explanation is required, including how the determination was made:

______________________________________________________________________
BUDGET

Primary Reviewer: Fiscal Expert
Secondary Reviewer: N/A

Authority: Section 330(e)(5)(A) and Section 330(k)(3)(I)(i) of the PHS Act; and 45 CFR 75.308(a) and 45 CFR 75 Subpart E

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Updated Annual Budget for the health center project (if updated since last application submission to HRSA/BPHC)
☐ Financial Management Procedures (for context and background on budget development process)
☐ Most recent annual audit and management letters or audited financial statements (as reference for any other lines of business)

Documents Provided at the Start of the Site Visit:

☐ Budget to Actual Comparison Reports for the current fiscal year and the prior fiscal year
☐ Separate organizational budget(s) (if applicable) (in situations where the health center has an organizational budget that is separate from the budget for the health center project)

Demonstrating Compliance

Element a: Annual Budgeting for Scope of Project

The health center develops and submits to HRSA (for new or continued funding or designation from HRSA) an annual operating budget, also referred to as a “total budget,” that reflects projected costs and revenues necessary to support the health center’s proposed or HRSA-approved scope of project.

Site Visit Team Methodology

- Review health center’s most current annual budget for the health center project.

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85 A health center’s “total budget” includes the Health Center Program federal award funds and all other sources of revenue in support of the HRSA-approved health center scope of project.
86 Any aspects of the requirement that relate to the use of Health Center Program federal award funds are not applicable to look-alikes.
- Review Budget to Actual Comparison Reports for the current fiscal year and the prior fiscal year.
- Review health center’s approved scope of project (Form 5A and 5B), including any special populations funding or designation. Determine if there has been any change in the scope of project since the last Health Center Program application which impacts the current budget.
- Interview health center Project Director/CEO, CFO/financial staff to understand budget formulation process (e.g., budget assumptions), including any variances or questions raised by the review of budget to the actual comparison reports.

Site Visit Findings

1. Has the health center developed an annual operating budget that is reflective of the projected costs and revenues necessary to support the health center’s HRSA-approved scope of project (i.e., reflects revenue and expenses for all sites, services, and activities within the scope of project)?

☐ YES ☐ NO
If No, an explanation is required:

________________________________________

Element b: Revenue Sources

In addition to the Federal Health Center Program award, the health center’s annual operating budget includes all other projected revenue sources that will support the health center project, specifically:

- Fees, premiums, and third-party reimbursements and payments that are generated from the delivery of services;
- Revenues from state, local, or other federal grants (for example, Ryan White, Healthy Start) or contracts;
- Private support or income generated from contributions; and
- Any other funding expected to be received for purposes of supporting the health center project.

Site Visit Team Methodology

N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (Service Area Competition (SAC) or Renewal of Designation (RD)). No onsite review of this element is required.

Site Visit Findings

N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (SAC or RD). No onsite review of this element is required.
Element c: Allocation of Federal and Non-Federal Funds

The health center’s annual operating budget identifies the portion of projected costs to be supported by the federal Health Center Program award. Any proposed costs supported by the federal award are consistent with the Federal Cost Principles\(^{87}\) and the terms and conditions\(^{88}\) of the award.

Site Visit Team Methodology

\textbf{N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (SAC or RD). No onsite review of this element is required.}

Site Visit Findings

\textbf{N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (SAC or RD). No onsite review of this element is required.}

Element d: Other Lines of Business

If the health center organization operates or conducts other lines of business (i.e., activities that are not part of the HRSA-approved scope of project), the costs of these other activities are not included in the annual operating budget for the health center project.\(^{89}\)

Site Visit Team Methodology

- Interview health center Project Director/CEO, CFO/financial staff to determine whether the health center operates other lines of business.
- Review any separate organizational budget(s) (if applicable).
- Review health center’s approved scope of project (Form 5A and 5B).
- Review most recent audit or audited financial statements to determine if there are other lines of business.

Site Visit Findings

\textit{In responding to the questions below, please note:}

\textit{Net revenue from other lines of business may be included in the health center project’s operating budget.}

\(^{87}\) Please see 45 CFR Part 75 Subpart E: Cost Principles.
\(^{88}\) For example, health centers may not use HHS federal award funds to support salary levels above the salary limitations on federal awards.
\(^{89}\) As these other lines of business are not included in the health center’s total budget, they are not subject to Health Center Program requirements and not eligible for related Health Center Program benefits (for example, reimbursement as a Federally Qualified Health Center under Medicare/Medicaid/CHIP, 340B Drug Pricing Program eligibility, Federal Tort Claims Act coverage).
2. Does the health center engage in any other lines of business (i.e., the health center serves other populations or operates sites, services, or activities that are NOT within the HRSA-approved scope of project)?
☐ YES ☐ NO

3. If Yes:
   ◦ Can the health center document that these other lines of business are fully supported by non-health center project revenues?
     ☐ YES ☐ NO ☐ NOT APPLICABLE
   ◦ Can the health center document that all expenses from such other lines of business are excluded from the annual operating budget for the health center project?
     ☐ YES ☐ NO ☐ NOT APPLICABLE

If No was selected for any of the above, an explanation is required:
______________________________________________________________________
PROGRAM MONITORING AND DATA REPORTING SYSTEMS

Primary Reviewer: Fiscal or Governance/Administrative Expert  
Secondary Reviewer: Governance/Administrative or Fiscal Expert

Authority: Section 330(k)(3)(I)(ii) of the PHS Act; 42 CFR 51c.303(j) and 42 CFR 56.303(j); and 45 CFR 75.342(a) and (b)

Document Checklist for Health Center Staff

Documents Provided at the Start of the Site Visit:

☐ Sample of program reports generated by the health center for the governing board or key management staff (e.g., board packets from the past few months, reports provided to the Finance or Quality Improvement Committee, routine reports generated by the health center for key management staff) that include information on:
  ◦ Patient service utilization
  ◦ Trends and patterns in the patient population
  ◦ Overall health center clinical, financial, or operational performance

Element a: Collecting and Organizing Data

The health center has a system in place for overseeing the operations of the Federal award-supported activities to ensure compliance with applicable Federal requirements and for monitoring program performance. Specifically:

- The health center has a system in place to collect and organize data related to the HRSA-approved scope of project, as required to meet HHS reporting requirements, including those data elements for Uniform Data System (UDS) reporting; and
- *The health center submits timely, accurate, and complete UDS reports in accordance with HRSA instructions and submits any other required HHS and Health Center Program reports.*

*Note: HRSA will assess whether the health center has demonstrated compliance in terms of submitting timely, accurate and complete UDS reports based on internal HRSA UDS reporting information. No onsite review of this portion of the element is required.
Site Visit Team Methodology

- Interview health center Project Director/CEO and, if applicable, CIO or other staff (including IT staff) tasked with data management, collection, or reporting.
- Review health center’s Electronic Health Records (EHR), practice management system or other data collections systems or methods, which may include participation in a Health Center Controlled Network. This may include a navigation of the systems or methods, if helpful.
- Confer with Operational Site Visit team members for input on related data systems (e.g., systems used to support Quality Improvement/Quality Assurance, Financial Management and Accounting, Billing and Collections).

Site Visit Findings

In responding to the question below, please note:

Findings related to financial management and accounting systems capacity or quarterly Quality Improvement/Quality Assurance assessments are to be assessed and documented within the Financial Management and Accounting Systems requirement and Quality Improvement/Assurance requirement, respectively, and do NOT need to be repeated here.

1. Does the health center have systems or methods in place to collect and organize data, including ensuring the integrity of such data, for the purposes of overseeing the health center project and for monitoring and reporting on program performance?
   - YES  
   - NO

   If No, an explanation is required, including specifying any deficiencies in the health center’s methods or safeguards for ensuring the integrity of data:

Element b: Data-Based Reports

The health center produces data-based reports on patient service utilization; trends and patterns in the patient population; and overall health center performance, as necessary to inform and support internal decision-making and oversight by the health center’s key management staff and by the governing board.

Site Visit Team Methodology

- Review one to two samples of internal health center data reports (e.g., monthly board reports, dashboards, presentations).
- Interview health center key management staff and board members regarding the receipt and relevance of health center data-based reports.

Site Visit Findings

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90 Examples of data health centers may analyze as part of such reports may include patient access to and satisfaction with health center services, patient demographics, quality of care indicators, and health outcomes.
2. Do the health center’s program data reporting systems or methods result in the production of relevant reports that can inform and support internal decision-making and oversight by key management staff and the governing board? This would include, but is not limited to, the production of reports regarding:

   - Patient service utilization?
     - □ YES  □ NO

   - Trends and patterns in the patient population?
     - □ YES  □ NO

   - Overall health center clinical, financial, or operational performance?
     - □ YES  □ NO

If No was selected for any of the above, an explanation is required:

______________________________________________________________________
BOARD AUTHORITY

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

Authority: Section 330(k)(3)(H) of the PHS Act; 42 CFR 51c.303(i), 42 CFR 56.303(i), 42 CFR 51c.304(d), and 42 CFR 56.304(d); and 45 CFR 75.507(b)(2)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ 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)
☐ Articles of Incorporation (if updated since last application submission to HRSA/BPHC)
☐ Bylaws (if updated since last application submission to HRSA/BPHC)
☐ Co-applicant agreement (if applicable) (if updated since last application submission to HRSA/BPHC)
☐ Position description for the Project Director/CEO

Documents Provided at the Start of the Site Visit:

☐ Board minutes [health center to research and provide relevant minutes] for:
  ◦ most recent 12 months
  ◦ any prior meetings in the past 3 years to demonstrate that board authorities were explicitly exercised, including approving key policies on:
    ▪ Sliding Fee Discount Program
    ▪ Quality Improvement/Assurance Program
    ▪ Billing and Collections (policy for waiving or reducing patient fees and if applicable, refusal to pay)
    ▪ Financial Management and Accounting Systems
    ▪ Personnel
☐ Board committee minutes OR committee documents from the past 12 months
☐ Sample board packets from two board meetings within the past 12 months
☐ Board calendar or work plan
☐ Strategic plan or long term planning documents within the past 3 years
☐ Most recent evaluation of Project Director/CEO
☐ Project Director/CEO employment agreement (for the purposes of provisions regarding Project Director/CEO selection, evaluation, and dismissal or termination)
☐ Agreements with parent corporation, affiliate, subsidiary, or subrecipient organization (if applicable)
☐ Collaborative or contractual agreements with outside entities that may impact the health center board’s authorities or functions
Demonstrating Compliance

1. Is the health center operated by an Indian tribe, tribal group, or Indian organization under the Indian Self-Determination Act or an Urban Indian Organization under the Indian Health Care Improvement Act?
   ☐ YES ☐ NO

   NOTE: IF “YES” WAS SELECTED, NONE OF THE QUESTIONS FOR ANY OF THE ELEMENTS IN THE BOARD AUTHORITY SECTION ARE APPLICABLE.

Element a: Maintenance of Board Authority Over Health Center Project

The health center's organizational structure, articles of incorporation, bylaws, and other relevant documents ensure the health center governing board maintains the authority for oversight of the health center project, specifically:

- The organizational structure and documents do not allow for any other individual, entity or committee (including, but not limited to, an executive committee authorized by the board) to reserve approval authority or have veto power over the health center board with regard to the required authorities and functions; 91
- In cases where a health center collaborates with other entities in fulfilling the health center’s HRSA-approved scope of project, such collaboration or agreements with the other entities do not restrict or infringe upon the health center board’s required authorities and functions; and
- For public agencies with a co-applicant board, 92 the health center has a co-applicant agreement that delegates the required authorities and functions to the co-applicant board and delineates the roles and responsibilities of the public agency and the co-applicant in carrying out the health center project.

Site Visit Team Methodology

- Review organizational chart(s) (health center project and, if applicable, corporate), articles of incorporation, bylaws, and other relevant documents.
- Review health center’s current Forms 5A and 5B to determine current HRSA-approved scope of project.
- Review any collaborative or contractual agreements with outside entities that may impact the health center board’s authorities or functions.
- Review co-applicant agreement (if applicable).

91 This does not preclude an executive committee from taking actions on behalf of the board in emergencies, on which the full board will subsequently vote.
92 Public agencies are permitted to utilize a co-applicant governance structure for the purposes of meeting Health Center Program governance requirements. Public centers may be structured in one of two ways to meet the program requirements: 1) the public agency independently meets all the Health Center Program governance requirements based on the existing structure and vested authorities of the public agency’s governing board; or 2) together, the public agency and the co-applicant meet all Health Center Program requirements.
- Review agreements with parent corporation, affiliate, subsidiary, or subrecipient organization (if applicable).

**Site Visit Findings**

*In responding to the questions below, please note:*

*In a public agency/co-applicant health center arrangement, the public agency is not considered to be an outside entity as it is the award recipient.*

2. Do health center documents and agreements contain language or provisions that allow:

   ◦ Any other individual, entity or committee (including, but not limited to, an executive committee authorized by the board) to reserve or have approval/veto power over the health center board with regard to the required authorities and functions?
     ☐ YES ☐ NO

   ◦ Any of the health center’s collaborations or agreements with other entities to restrict or infringe upon the health center board’s required authorities and functions?
     ☐ YES ☐ NO

If Yes was selected for any of the above, an explanation is required:
______________________________________________________________________

3. **For public agencies with a co-applicant board:** Does the health center have a co-applicant agreement that delegates the required authorities and functions to the co-applicant board and that delineates the roles and responsibilities of the public agency and the co-applicant in carrying out the health center project?

   ☐ YES ☐ NO ☐ NOT APPLICABLE

If No, an explanation is required:
______________________________________________________________________

**Element b: Required Authorities and Responsibilities**

The health center’s articles of incorporation, bylaws, or other relevant documents outline the following required authorities and responsibilities of the governing board:

- Holding monthly meetings;
- Approving the selection (and termination or dismissal, as appropriate) of the health center’s Project Director/CEO;
- Approving the annual Health Center Program project budget and applications;
- Approving health center services and the location and hours of operation of health center sites;
- Evaluating the performance of the health center;
• Establishing or adopting policy93 related to the operations of the health center; and
• Assuring the health center operates in compliance with applicable Federal, State, and local laws and regulations.

Site Visit Team Methodology

- Review the health center’s articles of incorporation, bylaws, and other relevant documents.
- Review co-applicant agreement (if applicable).

Site Visit Findings

4. Do the health center’s articles of incorporation, bylaws (either for the health center board or, if applicable, the co-applicant health center board) or other corporate documents (e.g., co-applicant agreement) outline the following required authorities and responsibilities:

  ◦ Holding monthly meetings?
    □ YES □ NO
  
  ◦ Approving the selection (and termination or dismissal, as appropriate) of the health center’s Project Director/CEO?
    □ YES □ NO
  
  ◦ Approving the health center’s annual budget and applications?
    □ YES □ NO
  
  ◦ Approving health center services and the location and hours of operation of health center sites?
    □ YES □ NO
  
  ◦ Evaluating the performance of the health center?
    □ YES □ NO
  
  ◦ Establishing or adopting policy related to the operations of the health center?
    □ YES □ NO
  
  ◦ Assuring the health center operates in compliance with applicable Federal, State, and local laws and regulations?
    □ YES □ NO

If No was selected for any of the above, an explanation is required, including specifying which authorities/responsibilities are not addressed in such documents:

_____________________________________________________________________

93 The governing board of a health center is generally responsible for establishing and/or approving policies that govern health center operations, while the health center’s staff is generally responsible for implementing and ensuring adherence to these policies (including through operating procedures).
Element c: Exercising Required Authorities and Responsibilities

The health center’s board minutes and other relevant documents confirm that the board exercises, without restriction, the following authorities and functions:

- Holding monthly meetings where a quorum is present to ensure the board has the ability to exercise its required authorities and functions;
- Approving the selection, evaluation and, if necessary, the dismissal or termination of the Project Director/CEO from the health center project;
- Approving applications related to the health center project, including approving the annual budget, which outlines the proposed uses of both Health Center Program award and non-Federal resources and revenue;
- Approving the health center project’s sites, hours of operation and services, including decisions to subaward or contract for a substantial portion of the health center’s services;
- Monitoring the financial status of the health center, including reviewing the results of the annual audit, and ensuring appropriate follow-up actions are taken;
- Conducting long-range/strategic planning at least once every three years, which at a minimum addresses financial management and capital expenditure needs; and
- Evaluating the performance of the health center based on quality assurance/quality improvement assessments and other information received from health center management, and ensuring appropriate follow-up actions are taken regarding:
  ◦ Achievement of project objectives;
  ◦ Service utilization patterns;
  ◦ Quality of care;
  ◦ Efficiency and effectiveness of the center; and
  ◦ Patient satisfaction, including addressing any patient grievances.

Site Visit Team Methodology

- Interview Project Director/CEO regarding how board carries out its functions.
- Interview board (co-applicant board in the case of a public agency-co-applicant model) regarding how it carries out board functions, specifically how:
  ◦ Project Director/CEO reports to the board
  ◦ Board carries out its functions
- Goal is to interview a majority of board members as a group. If this is not possible, interview officers and at least one patient member. If group interview is not possible, interview individually.
- If conducting a review for a public agency health center, interview relevant public agency staff (e.g., leadership, staff within the unit of the public agency related to the health center project) about their various roles and responsibilities.
- Review board calendar or other related scheduling or planning documents.

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94 For more information related to the production of reports associated with these topics, see Health Center Program Compliance Manual, Chapter 18: Program Monitoring and Data Reporting Systems, Chapter 15: Financial Management and Accounting Systems, and Chapter 10: Quality Improvement/Accurance.
- Review board minutes [health center to research and provide relevant minutes] for most recent 12 months and minutes for any prior meetings in the past 3 years to demonstrate that board authorities were explicitly exercised.
- Review any relevant board committee minutes OR committee documents from within the past 12 months that support board functions and activities.
- Review sample of board packets from within the past 12 months.
- Review strategic planning or related documents from within the past 3 years.
- Review most recent Project Director/CEO evaluation documentation.
- Review the position description and employment agreement for the Project Director/CEO.

Site Visit Findings

5. Do board minutes document that the board met monthly for the past 12 months and had a quorum (quorum is determined by the health center) present that enabled the board to carry out its required authorities and functions?
   ☐ YES ☐ NO

   If No, an explanation is required:

6. Based on your review of board minutes and other relevant documents as well as interviews conducted with the CEO and board members, were there examples of how the board exercises the following authorities and functions:

   ◦ Approving the selection of, evaluating and, if necessary, approving the dismissal or termination of the Project Director/CEO from the health center project?
     ☐ YES ☐ NO

   ◦ Approving applications related to the health center project, including approving the annual budget, which outlines the proposed uses of both Federal Health Center Program award and non-Federal resources and revenue?
     ☐ YES ☐ NO

   ◦ Approving health center project’s sites, hours of operation and services, including (if applicable) subawarding or contracting for a substantial portion of the health center’s services?
     ☐ YES ☐ NO

   ◦ Monitoring the financial status of the health center, including reviewing the results of the annual audit and ensuring appropriate follow-up actions are taken?
     ☐ YES ☐ NO

   ◦ Conducting long-range/strategic planning at least once every three years, which at a minimum addresses financial management and capital expenditure needs?
     ☐ YES ☐ NO
• Evaluating the performance of the health center based on quality assurance/quality improvement assessments and other information received from health center management?\textsuperscript{95}
  \begin{itemize}
    \item YES
    \item NO
  \end{itemize}

If No was selected for any of the above, an explanation is required, including specifying any restrictions on the board in carrying out these authorities and functions:
______________________________________________________________________

7. Have follow-up actions been planned or taken and reported back to the board regarding:

• Achievement of project objectives?
  \begin{itemize}
    \item YES
    \item NO
    \item NOT APPLICABLE
  \end{itemize}

• Service utilization patterns?
  \begin{itemize}
    \item YES
    \item NO
    \item NOT APPLICABLE
  \end{itemize}

• Quality of care?
  \begin{itemize}
    \item YES
    \item NO
    \item NOT APPLICABLE
  \end{itemize}

• Efficiency and effectiveness of the center?
  \begin{itemize}
    \item YES
    \item NO
    \item NOT APPLICABLE
  \end{itemize}

• Patient satisfaction, including addressing any patient grievances?
  \begin{itemize}
    \item YES
    \item NO
    \item NOT APPLICABLE
  \end{itemize}

If No OR Not Applicable was selected for any of the above, an explanation is required:
______________________________________________________________________

Element d: Adopting, Evaluating, and Updating Health Center Policies

The health center board has adopted, evaluated at least once every three years, and, as needed, approved updates to policies in the following areas: Sliding Fee Discount Program, Quality Improvement/Assurance Program, and Billing and Collections.\textsuperscript{96}

Site Visit Team Methodology

- Review board minutes [health center to research and provide relevant minutes] from previous 3 years to confirm that the board has reviewed and, if needed, approved updates to the following policies:
  \begin{itemize}
    \item Sliding Fee Discount Program
  \end{itemize}

\textsuperscript{95} For more information related to the production of reports associated with these topics, please see Health Center Program Compliance Manual, Chapter 18: Program Monitoring and Data Reporting Systems, Chapter 15: Financial Management and Accounting Systems, and Chapter 10: Quality Improvement/Assurance.

\textsuperscript{96} Policies related to billing and collections that require board approval include those that address the waiving or reducing of amounts owed by patients due to inability to pay, and, if applicable, those that limit or deny services due to refusal to pay.
Site Visit Findings

8. Within the last three years, has the board adopted or evaluated health center policies in the following areas:

   ◦ Sliding Fee Discount Program?
     □ YES □ NO

   ◦ Quality Improvement/Assurance Program?
     □ YES □ NO

   ◦ Billing and Collections (policy for waiving or reducing patient fees and if applicable, refusal to pay)?
     □ YES □ NO

   If No was selected for any of the above, an explanation is required:

   __________________________________________________________

9. Was the health center able to provide one to two examples, if applicable, of actions taken as a result of these evaluations (e.g., updating a particular policy, making recommendations to key management)?

   □ YES □ NO □ NOT APPLICABLE

   If No or Not Applicable, an explanation is required:

   __________________________________________________________

Element e: Adopting, Evaluating, and Updating Financial and Personnel Policies

The health center board has adopted, evaluated at least once every three years, and, as needed, approved updates to policies that support financial management and accounting systems and personnel policies. However, in cases where a public agency is the recipient of the Health Center Program Federal award or designation and has established a co-applicant structure, the public agency may establish and retain the authority to adopt and approve policies that support financial management and accounting systems and personnel policies.

Site Visit Team Methodology

- Review board minutes [health center to research and provide relevant minutes] from previous 3 years to confirm that the board has reviewed and, if needed, approved updates to the following policies:
  - Financial Management and Accounting Systems
  - Personnel
- Interview same board members as previously identified regarding their process for evaluating financial management and accounting systems and personnel policies.
- Review the co-applicant agreement to determine if the public agency retains authority for adopting and approving personnel and financial management policies (if applicable; ONLY if conducting a site visit for a public agency health center with a co-applicant board).

Site Visit Findings

In responding to the question below, please note:
The content and extent of a health center’s financial management and personnel policies may vary. For example, some financial management policies may address procurement, but the lack thereof does not indicate non-compliance. Assessing compliance with respect to procurement procedures is addressed in Contracts and Subawards.

10. Within the last three years, has the board evaluated health center policies that support the following areas:

- Financial management and accounting systems?
  - YES
  - NO
  - NOT APPLICABLE

- Personnel?
  - YES
  - NO
  - NOT APPLICABLE

Note: For health centers where the public agency retains the authority to adopt and approve the policies listed, select “Not Applicable” for the above questions.

If No was selected for any of the above, an explanation is required:
BOARD COMPOSITION

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

Authority: Section 330(k)(3)(H) of the PHS Act; and 42 CFR 51c.304 and 42 CFR 56.304

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ 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)
☐ Form 6A or Board Roster (if updated since last application submission to HRSA/BPHC)
☐ Articles of Incorporation (if updated since last application submission to HRSA/BPHC)
☐ Bylaws (if updated since last application submission to HRSA/BPHC)
☐ Co-applicant agreement (if applicable) (if updated since last application submission to HRSA/BPHC)

Documents Provided at the Start of the Site Visit:

☐ Documentation regarding board member representation (e.g., applications, bios, disclosure forms)
☐ Clinical or billing records within the past 24 months to verify board member patient status
☐ For health centers with approved waivers, examples of the use of special populations input (e.g., board minutes, board meeting handouts, board packets)

Demonstrating Compliance

1. Is the health center operated by an Indian tribe, tribal group, or Indian organization under the Indian Self-Determination Act or an Urban Indian Organization under the Indian Health Care Improvement Act?
   ☐ YES ☐ NO

   NOTE: IF “YES” WAS SELECTED, NONE OF THE QUESTIONS FOR ANY OF THE ELEMENTS IN THE BOARD COMPOSITION SECTION ARE APPLICABLE.

Element a: Board Member Selection and Removal Process

The health center has bylaws or other relevant documents that specify the process for ongoing selection and removal of board members. This board member selection and removal process does not permit any other entity, committee or individual (other than the board) to select either
the board chair or the majority of health center board members,\(^\text{97}\) including a majority of the non-patient board members.\(^\text{98}\)

**Site Visit Team Methodology**

- Review organizational chart(s) (health center project and, if applicable, corporate), articles of incorporation, bylaws, or other relevant documents and co-applicant agreement (if applicable).

  **Note:** Bylaw provisions regarding composition are to be assessed for compliance with Health Center Program requirements as noted in the Health Center Program Compliance Manual and are not to be assessed beyond those requirements.

**Site Visit Findings**

2. Do the bylaws or other documentation specify an ongoing selection and removal process for board members?
   - □ YES  □ NO
   
   If No, an explanation is required:
   
   

3. Do the bylaws or other documentation in any way limit the health center’s ability to select or remove its own board members, specifically the ability to select any of the following:

   - The board chair?
     - □ YES  □ NO
   
   - The majority of health center board members?
     - □ YES  □ NO
   
   - The majority of the non-patient board members?
     - □ YES  □ NO
   
   If Yes was selected for any of the above, an explanation is required describing how the health center board is limited in its board member selection or removal process:
   
   

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\(^{97}\) An outside entity may only remove a board member who has been selected by that entity as an organizational representative to the governing board.

\(^{98}\) For example, if the health center has an agreement with another organization, the agreement does not permit that organization to select either the chair or a majority of the health center board.
Element b: Required Board Composition

The health center has bylaws or other relevant documents that require the board to be composed as follows:

- Board size is at least 9 and no more than 25 members,\textsuperscript{99} with either a specific number or a range of board members prescribed;
- At least 51 percent of board members are patients served by the health center. For the purposes of board composition, a patient is an individual who has received at least one service in the past 24 months that generated a health center visit, where both the service and the site where the service was received are within the HRSA-approved scope of project;
- Patient members of the board, as a group, reasonably represent the individuals who are served by the health center in terms of demographic factors, such as race, ethnicity, and gender;
- Non-patient members are representative of the community served by the health center or the health center’s service area;
- Non-patient members are selected to provide relevant expertise and skills such as:
  - Community affairs;
  - Local government;
  - Finance and banking;
  - Legal affairs;
  - Trade unions and other commercial and industrial concerns; and
  - Social services;
- No more than one-half of non-patient board members derive more than 10 percent of their annual income from the health care industry; and
- Health center employees\textsuperscript{100,101} and immediate family members of employees (i.e., spouses, children, parents, or siblings through blood, adoption, or marriage) may not be health center board members.

Site Visit Team Methodology

- Review the health center articles of incorporation, bylaws, or other relevant documents and co-applicant agreement (if applicable).

Site Visit Findings

4. Do the bylaws or other documentation include provisions that ensure:

\textsuperscript{99} For the purposes of the Health Center Program, the term “board member” refers only to voting members of the board.
\textsuperscript{100} For the purposes of health center board composition, an employee of the health center would include an individual who would be considered a “common-law employee” or “statutory employee” according to the Internal Revenue Service criteria, as well as an individual who would be considered an employee for state or local law purposes.
\textsuperscript{101} In the case of public agencies with co-applicant boards, this includes employees or immediate family members of both the co-applicant organization and the public agency component (for example, department, division, or sub-agency) in which the health center project is located.
Board size is at least 9 and no more than 25 members, with either a specific number or a range of board members prescribed?
☐ YES  ☐ NO

At least 51% of board members are patients served by the health center (Note: Select “Not Applicable” only if the health center has an approved waiver)?
☐ YES  ☐ NO  ☐ NOT APPLICABLE

Patient members of the board, as a group, reasonably represent the individuals who are served by the health center in terms of demographic factors, such as race, ethnicity, and gender?
☐ YES  ☐ NO

Non-patient members are representative of the community served by the health center or the health center’s service area?
☐ YES  ☐ NO

Non-patient members are selected to provide relevant expertise and skills such as community affairs, local government, finance and banking, legal affairs, trade unions and other commercial and industrial concerns, and social services?
☐ YES  ☐ NO

No more than one-half of non-patient board members derive more than 10% of their annual income from the health care industry?102
☐ YES  ☐ NO

Health center employees103,104 and immediate family members (i.e., spouses, children, parents, or siblings through blood, adoption, or marriage) of employees may not be health center board members?
☐ YES  ☐ NO

If No was selected for any of the above, an explanation is required:
__________________________________________________________________

102 Per the regulations in 42 CFR 56.304, for health centers funded and look-alikes designated solely under section 330(g) of the Public Health Service (PHS) Act, no more than two-thirds of the non-patient board members may derive more than 10% of their annual income from the health care industry.
103 For the purposes of health center board composition, an employee of the health center would include an individual who would be considered a common-law employee” or “statutory employee” according to the Internal Revenue Service criteria, as well as an individual who would be considered an employee for state or local law purposes.
104 In the case of public agencies with co-applicant boards, this includes employees or immediate family members of both the co-applicant organization and the public agency component (for example, department, division, or sub-agency) in which the health center project is located.
Element c: Current Board Composition

The health center has documentation that the board is composed of:

- At least 9 and no more than 25 members;
- A patient\textsuperscript{105} majority (at least 51 percent);
- Patient members of the board, as a group, reasonably represent the individuals who are served by the health center in terms of demographic factors – such as race, ethnicity, and gender – consistent with the demographics reported in the health center’s Uniform Data System (UDS) report;\textsuperscript{106}
- Representative(s) from or for each of the funded/designated special population(s)\textsuperscript{107} for those health centers that receive any funding/look-alike designation under one or more of the special populations section 330 subparts, 330(g), (h), and/or (i); and
- As applicable, non-patient board members:
  - Who are representative of the community in which the health center is located, either by living or working in the community, or by having a demonstrable connection to the community;
  - With relevant skills and expertise in areas such as community affairs, local government, finance and banking, legal affairs, trade unions, other commercial and industrial concerns, or social services within the community; and
  - Of whom no more than 50 percent earn more than 10 percent of their annual income from the health care industry.\textsuperscript{108}

Site Visit Team Methodology

- Interview board members (concurrent with interviews for Board Authority requirements).
- Review current board roster or Form 6A.
- Review documentation regarding board member representation.
- Review clinical or billing records to confirm the patient status of board members.
- Review UDS data for an overview of patient population demographic factors (race, ethnicity and gender).
- Review background information on health center to confirm special populations funding or designation (if applicable).

\textsuperscript{105} A legal guardian of a patient who is a dependent child or adult, a person who has legal authority to make health care decisions on behalf of a patient, or a legal sponsor of an immigrant patient may also be considered a patient of the health center for purposes of board representation. Students who are health center patients may participate as board members subject to state laws applicable to such non-profit board members.

\textsuperscript{106} For health centers that have not yet made a UDS report, this would be assessed based on demographic data included in the health center’s application.

\textsuperscript{107} Representation could include advocates for the health center’s 330 (g), (h), or (i) patient population (for example, those who have personally experienced being a member of, have expertise about, or work closely with the current special population). Such advocate board members would count as “patient” board members only if they meet the patient definition set forth in the Health Center Program Compliance Manual.

\textsuperscript{108} For example, in a 9 member board with 5 patient board members, there could be 4 non-patient board members. In this case, no more than 2 non-patient board members could earn more than 10% of their income from the health care industry.
Site Visit Findings

5. Is the health center board composed of at least 9 and no more than 25 members?
   ☐ YES ☐ NO
   
   If No, an explanation is required, including specifying the number of total board members:

6. Are at least 51% of health center board members classified by the health center as patients?
   
   Note: Select “Not Applicable” only if the health center has an approved waiver.
   ☐ YES ☐ NO ☐ NOT APPLICABLE
   
   If No, an explanation is required, including specifying the number of total board members and how many (if any) are current patients of the health center:

7. Were you able to confirm that individuals classified by the health center as patient board members have actually received at least one in-scope service at an in-scope site within the past 24 months that generated a health center visit?
   ☐ YES ☐ NO
   
   If No, an explanation is required:

8. For health centers with special populations funding/designation: Was the health center able to identify one or more board member(s) who serves as a representative from or for each of the health center’s funded/designated special population(s) (individuals experiencing homelessness, migratory and seasonal agricultural workers, residents of public housing)?
   ☐ YES ☐ NO ☐ NOT APPLICABLE
   
   If No, an explanation is required:

9. Has the health center ensured that patient board members as a group are representative of the health center’s patient population in terms race, ethnicity, and gender?
   
   Note: Select “Not Applicable” only if the health center has an approved waiver.
   ☐ YES ☐ NO ☐ NOT APPLICABLE
   
   If No, an explanation is required:

10. For the health center’s non-patient board members, do all such board members either live or work in the community?
    ☐ YES ☐ NO
If No, an explanation is required describing whether/how board members who do not live or work in the community have a demonstrable connection to the community:

______________________________________________________________________

11. Do the non-patient board members have relevant skills and expertise in a variety of areas that support the board’s governance and oversight role (e.g., community affairs, local government, finance, banking, legal affairs, trade unions, major local employers or businesses, social services)?
☐ YES ☐ NO

If No, an explanation is required:
______________________________________________________________________

12. Do any non-patient board members earn more than 10% of their annual income from the health care industry?109

Note: The health center determines within its policies how to define “health care industry” and how to determine the percentage of annual income of each non-patient board member derived from the health care industry.

☐ YES ☐ NO

If Yes, an explanation is required that includes the number of non-patient board members who earn more than 10% of their annual income from the health care industry and the total number of non-patient board members:
______________________________________________________________________

Element d: Prohibited Board Members

The health center verifies periodically (for example, annually or during the selection or renewal of board member terms) that the governing board does not include members who are current employees of the health center, or immediate family members of current health center employees (i.e., spouses, children, parents, or siblings through blood, adoption, or marriage).

Site Visit Team Methodology

- Interview board members (concurrent with interviews for Board Authority requirements).
- Review current board roster or Form 6A.
- Review documentation regarding board member representation.

Site Visit Findings

13. Has the health center verified that the current board does not include any members who are:

______________________________________________________________________

109 Per the regulations in 42 CFR 56.304, for health centers funded and look-alikes designated solely under section 330(g) of the PHS Act, no more than two-thirds of the non-patient board members may derive more than 10% of their annual income from the health care industry.
Element e: Waiver Requests

Health centers requesting a waiver of the patient majority board composition requirements for health centers receiving Health Center Program funding only for special populations (sections 330(g), (h), and/or (i)) present to HRSA for review and approval:

- “Good cause” that justifies the need for the waiver by documenting:
  - The unique characteristics of the population (homeless, migratory or seasonal agricultural worker, and/or public housing patient population) or service area that create an undue hardship in recruiting a patient majority; and
  - Its attempt(s) to recruit a majority of special population board members within the past three years; and

- Strategies that will ensure patient participation and input in the direction and ongoing governance of the organization by addressing the following elements:
  - Collection and documentation of input from the special population(s);
  - Communication of special population input directly to the health center governing board; and
  - Incorporation of special population input into key areas, including but not limited to: selecting health center services;\(^{112}\) setting hours of operation of health center

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110 For the purposes of health center board composition, an employee of the health center would include an individual who would be considered a “common-law employee” or “statutory employee” according to the Internal Revenue Service criteria, as well as an individual who would be considered an employee for state or local law purposes.

111 In the case of public agencies with co-applicant boards, this includes employees or immediate family members of both the co-applicant organization and the public agency component (for example, department, division, or sub-agency) in which the health center project is located.

112 See Health Center Program Compliance Manual, Chapter 4: Required and Additional Health Services for more information on providing services within the HRSA-approved scope of project.
defining budget priorities;\textsuperscript{114} evaluating the organization’s progress in meeting goals, including patient satisfaction;\textsuperscript{115} and assessing the effectiveness of the sliding fee discount program.\textsuperscript{116}

\textbf{Site Visit Team Methodology}

\textit{N/A} – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (Service Area Competition (SAC) or Renewal of Designation (RD)). No onsite review of this element is required.

\textbf{Site Visit Findings}

\textit{N/A} – HRSA assesses whether the health center has demonstrated compliance with this element through its internal review of the competing continuation application (SAC or RD). No onsite review of this element is required.

\textbf{Element f: Utilization of Special Population Input}

For health centers with approved waivers, the health center has board minutes or other documentation that demonstrates how special population patient input is utilized in making governing board decisions in key areas.

\textbf{Site Visit Team Methodology}

\begin{itemize}
  \item \textbf{For health centers with an approved waiver:} Review the health center’s HRSA-approved waiver Form 6B.
  \item Review documented examples from the health center on the use of special populations input.
  \item Interview board members (concurrent with interviews for Board Authority requirements).
\end{itemize}

\textbf{Site Visit Findings}

14. \textbf{For health centers with approved waivers only:} Does the health center collect and document input from the special population(s)?

\textit{Note: Select “Not Applicable” only if the health center does not have an approved waiver.}

☐ YES ☐ NO ☐ NOT APPLICABLE

\textsuperscript{113} See Health Center Program Compliance Manual, Chapter 6: Accessible Locations and Hours of Operation for more information on health center service sites and hours of operation.
\textsuperscript{114} See Health Center Program Compliance Manual, Chapter 17: Budget for more information on the Health Center Program project budget.
\textsuperscript{115} See Health Center Program Compliance Manual, Chapter 19: Board Authority for more information on the health center board’s required authorities.
\textsuperscript{116} See Health Center Program Compliance Manual, Chapter 9: Sliding Fee Discount Program for more information on requirements for health center sliding fee discount programs.
If No, an explanation is required:
______________________________________________________________________

15. Was the health center able to provide at least one example of how special population input has impacted board decision-making (e.g., selecting health center services; setting hours of operation of health center sites; defining budget priorities; evaluating the organization's progress in meeting goals, including patient satisfaction; or assessing the effectiveness of the sliding fee discount program)?
☐ YES   ☐ NO   ☐ NOT APPLICABLE

If No, an explanation is required:
______________________________________________________________________
FEDERAL TORT CLAIMS ACT (FTCA) DEEMING REQUIREMENTS

ONLY TO BE COMPLETED FOR HEALTH CENTERS THAT ARE CURRENTLY FTCA DEEMED

Primary Reviewer: Clinical Expert
Secondary Reviewer: N/A

Note that FTCA may consider the observations documented in this section of the site visit report during the annual application deeming/redeeming process. However, these observations will not be used for the purposes of assessing compliance with Health Center Program requirements.

Authority: Section 224(g)-(n) of the PHS Act (42 U.S.C. 233(g)-(n)); and 42 CFR Part 6

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Risk management policy(ies) and related operating procedures or protocols (including but not limited to procedures for tracking referrals, diagnostics, and hospital admissions ordered by health center providers, incident reporting for clinically-related complaints and “near misses”). Note: Health centers may have distinct “risk management” operating procedures OR these may be included or integrated within other health center operating procedures or protocols (e.g., HR, Quality Improvement/Quality Assurance, Admin, Clinical, Infection Control)
☐ Claims management process policy(ies)/procedures

Documents Provided at the Start of the Site Visit:

☐ Most recent HRSA-approved FTCA deeming application
☐ Risk management training plan and related tracking of training completion
☐ Documentation (e.g., board/committee minutes, supporting data, reports) of the last two quarterly risk management assessments of health center activities designed to reduce the risk of adverse outcomes (e.g., environment of care, incident tracking, infection control, patient safety) that could result in medical malpractice or other health or health-related litigation
☐ Board meeting minutes and/or most recent report(s) (within past 12 months) to the board that include the status of risk management activities
☐ Example(s) of methods used to inform patients of the health center’s deemed status (e.g., website, promotional materials, statements posted within an area(s) of the health center visible to patients)
☐ For health centers with closed claims from within the past 5 years under the FTCA: For each closed claim, documentation of steps implemented to mitigate the risk of such claims in the future (e.g., targeted staff training, improved records management, implementation of new clinical protocols)
Demonstrating Compliance

Is the health center currently deemed under the Federal Tort Claims Act (FTCA)?
☐ YES ☐ NO

NOTE: IF “NO” WAS SELECTED, NONE OF THE QUESTIONS FOR ANY OF THE ELEMENTS IN THIS FTCA SECTION ARE APPLICABLE.

Risk Management

Element a: Risk Management Program

The health center has and currently implements an ongoing health care risk management program to reduce the risk of adverse outcomes that could result in medical malpractice or other health or health-related litigation and that requires the following:

- Risk management across the full range of health center health care activities;
- Health care risk management training for health center staff;
- Completion of quarterly risk management assessments by the health center; and
- Annual reporting to the health center board which includes: completed risk management activities; status of the health center’s performance relative to established risk management goals; and proposed risk management activities that relate and/or respond to identified areas of high organizational risk.

Element b: Risk Management Procedures

The health center has risk management procedures that address the following areas for health center services and operations:

- Identifying and mitigating the health care areas/activities of highest risk within the health center’s HRSA-approved scope of project, including but not limited to tracking referrals, diagnostics, and hospital admissions ordered by health center providers;
- Documenting, analyzing, and addressing clinically-related complaints and “near misses” reported by health center employees, patients, and other individuals;
- Setting and tracking progress related to annual risk management goals;
- Developing and implementing an annual health care risk management training plan for all staff members based on identified areas/activities of highest clinical risk for the health center (including, but not limited to, obstetrical procedures and infection control) and any non-clinical trainings appropriate for health center staff (including HIPAA medical record confidentiality requirements); and
- Completing an annual risk management report for the board and key management staff.
Element c: Reports on Risk Management Activities

The health center provides reports to the board and key management staff on health care risk management activities and progress in meeting goals at least annually, and provides documentation to the board and key management staff showing that any related follow-up actions have been implemented.

Element d: Risk Management Training Plan

The health center has a health care risk management training plan for all staff members and documentation showing that such trainings have been completed by the appropriate staff, including all clinical staff, at least annually.

Element e: Individual who Oversees Risk Management

The health center designates an individual(s) (for example, a risk manager) who oversees and coordinates the health center’s health care risk management activities and completes risk management training annually.

Site Visit Team Methodology

- Review risk management policy(ies), procedure(s) and/or protocols.
- Review health care risk management training plan.
- Review training records to verify appropriate staff, including all clinical staff, completed risk management training at least annually.
- Review documentation of last two quarterly risk management assessments that address one or more areas of risk.
- Review relevant board meeting minutes and/or most recent report(s) (within past 12 months) to the board on the status of risk management activities.
- Interview the health center individual(s) (e.g., health center risk manager) who oversees and coordinates the health center’s risk management activities on implementation of related policies, procedures, training, assessment, reporting and follow-up actions.
- Interview other clinical leadership and health center individuals as necessary.

Site Visit Findings

1. Does the health center currently have an individual(s) who oversees and coordinates the health center’s risk management activities?  
☐ YES ☐ NO

If No, an explanation is required:

______________________________________________________________________

2. Do the health center’s risk management policies or procedures apply to all services and sites within the health center’s scope of project?  
☐ YES ☐ NO
If No, an explanation is required:

______________________________________________________________________

3. How does the health center identify and mitigate areas/activities of highest patient safety risk? Describe if and how this informs or aligns with the health center’s overall risk management program (e.g., staff training, establishment of risk management goals, changes in clinical safety practices).

An explanation is required, including one to two examples:

______________________________________________________________________

4. Was the health center able to provide examples of how it documents, analyzes and addresses clinically-related complaints and “near misses” reported by health center employees, patients, and other individuals?

☐ YES ☐ NO

If Yes OR No, an explanation is required, including describing the examples:

______________________________________________________________________

5. Was the health center able to produce documentation of its last two quarterly risk management assessments?

☐ YES ☐ NO

If No, an explanation is required:

______________________________________________________________________

6. Was the health center able to document that a report on the status of risk management activities and progress in meeting risk management goals was presented to the board and key management staff at least once in the past 12 months?

☐ YES ☐ NO

If No, an explanation is required:

______________________________________________________________________

7. What follow-up actions has the health center implemented based on its risk management assessments and its reporting to the board and key management staff?

An explanation is required, including explaining the health center’s reasoning if no related follow-up actions have been implemented:

______________________________________________________________________

8. Does the health center’s training plan require risk management training for relevant clinical staff on obstetrical procedures and infection control? Does the health center’s training plan also require training for all relevant staff on HIPAA medical record confidentiality requirements?

☐ YES ☐ NO

If No, an explanation is required specifying which trainings are not included in the training plan:

______________________________________________________________________
9. Is the health center tracking the progress of staff completion of training in accordance with its annual risk management training plan?

☐ YES ☐ NO

If No, an explanation is required:

______________________________________________________________________

Claims Management

Element a: Claims Management Process

The health center has a claims management process for addressing any potential or actual health or health-related claims, including medical malpractice claims, that may be eligible for FTCA coverage. In addition, this process ensures:

- The preservation of all health center documentation related to any actual or potential claim or complaint (for example, medical records and associated laboratory and x-ray results, billing records, employment records of all involved clinical providers, clinic operating procedures); and
- Any service-of-process/summons that the health center or its provider(s) receives relating to any alleged claim or complaint is promptly sent to the HHS, Office of the General Counsel, General Law Division, per the process prescribed by HHS and as further described in the FTCA Health Center Policy Manual.

Element b: Claims Activities Point-of-Contact

The health center has a designated individual(s) who is responsible for the management and processing of claims-related activities and serves as the claims point of contact.

Element c: Informing Patients of FTCA Deemed Status

The health center informs patients using plain language that it is a deemed federal Public Health Service (PHS) employee\(^{117}\) via its website, promotional materials, and/or within an area(s) of the health center that is visible to patients.

Element d: History of Claims: Cooperation and Mitigation

If a history of claims under the FTCA exists, the health center can document that it:

- Cooperated with the Attorney General, as further described in the FTCA Health Center Policy Manual; and
- Implemented steps to mitigate the risk of such claims in the future.

\(^{117}\) For example: “This health center receives HHS funding and has federal Public Health Service (PHS) deemed status with respect to certain health or health-related claims, including medical malpractice claims, for itself and its covered individuals.” For more information, please see [http://www.bphc.hrsa.gov/ftca/](http://www.bphc.hrsa.gov/ftca/).
Site Visit Team Methodology

- Interview designated individual(s) responsible for claims management.
- Review claims management process policy(ies)/procedures.
- Review claims management and claims history section of the FTCA application.
- Review example(s) of language used to inform patients that the health center is a deemed federal PHS employee.
- For health centers with closed claims from within the past 5 years under the FTCA: Review for each closed claim, documentation of steps implemented to mitigate the risk of such claims in the future.

Site Visit Findings

1. Does the health center currently have an individual(s) who is responsible for the management and processing of claims-related activities and who serves as the claims point of contact?
   ☐ YES ☐ NO
   If No, an explanation is required:

2. Was the health center able to describe how it has (if health center has a history of claims under FTCA) or would (if no claims history) manage health or health-related claims? Specifically, was the health center able to demonstrate how it has or would:
   - Preserve claims-related documentation (e.g., medical records and associated laboratory and x-ray results, billing records, employment records of all involved clinical providers, clinic operating procedures); and
   - Promptly communicate with HHS, Office of the General Counsel, General Law Division, regarding any actual or potential claim or complaint?
     ☐ YES ☐ NO
   If No, an explanation is required:

3. Does the health center inform patients (using plain language) that it is a deemed federal PHS employee via its website, promotional materials, and/or within an area(s) of the health center that is visible to patients?
   ☐ YES ☐ NO
   If No, an explanation is required:

4. For health centers with a history of closed claims under the FTCA within the past five years: For each closed claim, what steps has the health center implemented to mitigate the risk of such claim in the future?
   ☐ NOT APPLICABLE

   An explanation is required:
PERFORMANCE ANALYSIS

Primary Reviewer: Governance/Administrative or Clinical Expert
Secondary Reviewer: Fiscal Expert

Authority: 45 CFR 75.301

Document Checklist

Documents Provided Prior to Site Visit by BPHC Staff:

☐ Uniform Data System (UDS) Summary Report
☐ UDS Health Center Trend Report
☐ UDS Health Center Performance Comparison Report
☐ Clinical Performance Measure Form from most recent Service Area Competition (SAC) or Renewal of Designation (RD) application
☐ Progress update on clinical measure performance from most recent Budget Period Progress Report (BPR) or Annual Certification (AC) submission

Documents Provided at the Start of the Site Visit by Health Center:

☐ Examples of health center performance improvement activities related to diabetes control (e.g., staff training, patient interventions, collaborative participation)
☐ Quality Improvement/Quality Assurance (QI/QA) reports or other internal clinical performance measure data or data analysis on diabetes control (e.g., PDSA cycle data, diabetes control data more recent or more detailed than that reported in UDS)
☐ List of technical assistance and/or training needs that may support health center performance on diabetes control (self-identified by the health center, if applicable)

Performance Analysis

Health Center Participants

- Project Director/CEO
- CMO/Clinical and/or QI/QA Director
- Other QI/QA staff (if applicable)
- Providers and other key management staff (if available)

NOTES:

- The Diabetes Control measure must be selected for review.
- While this performance analysis process will focus on the diabetes control measure, the health center can subsequently replicate and apply this process to any area in which it desires improvement (e.g., clinical, governance, fiscal).
Site Visit Team Methodology

- Review the health center’s stated goal for the measure (included in most recent SAC or RD application) and review UDS trend and performance data (and any more recent health center performance data, if available) for the measure together with the health center staff.

- Lead the health center in a root cause analysis of its performance on the UDS Diabetes Control measure, including a review of the contributing and restricting factors the health center self-identified in its most recent application, as well as a discussion of other applicable factors the health center may not have identified.
  - Ask the health center to list the factors in order of priority. Specifically list the factors that have the strongest influence on the trend line first.
  - Ask the health center to include factors that are internal and external, as well as factors that are current and anticipated.
  - Consider how the health center’s goal for the measure might be impacted by these factors and/or how these factors might impact future actions the health center should commit to in order to reach its goal.

- Review and update, as appropriate, the top three action steps the health center will or is taking to address the identified root causes necessary to improve performance on the measure’s outcome.
  - These action steps must directly address and align with the factors identified in the root cause analysis.
  - This may include encouraging the health center to revise or disregard existing action steps or interventions that are not effective and do not address the root cause of the restricting or contributing factor(s).
  - For health centers that are already top quartile performers for the measure, identify root causes of the contributing factors that will be important to focus on in order to maintain the positive performance.
  - Encourage the health center to engage in continued root cause analysis to improve performance on other measures and areas.

Site Visit Findings

1. **Select a clinical performance measure for review.**

1.1 **Document Data for the Clinical Measure:** Complete this table by entering the three most recent years of UDS data for the selected measure. Please enter the data in ascending order by year (e.g., Diabetes Control measure data for Calendar Years: 2014-2015-2016). Data for Adjusted Quartile Ranking and data for National and State Averages are for the most recent calendar year. If data are not available for a particular year, please enter "0."

<table>
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<tr>
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<th>Adjusted Quartile Ranking (20XX)</th>
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</table>
1.2 Factors Contributing Performance: List up to five (5) factors most likely to be contributing to the health center’s performance for the selected measure. Contributing factors are those that push the trend in the desired direction. These should be factors that have the greatest influence on the trend line for the measure.

______________________________________________________________________  
______________________________________________________________________  
______________________________________________________________________  
______________________________________________________________________  
______________________________________________________________________

1.3 Factors Restricting Performance: List up to five (5) factors most likely to be restricting the health center’s performance for the selected measure. Restricting factors are those that create barriers to improved performance. When documenting these factors, also identify the related root cause.

______________________________________________________________________  
______________________________________________________________________  
______________________________________________________________________  
______________________________________________________________________  
______________________________________________________________________

1.4 Recommended Activities: Document the three (3) recommended activities or action steps the health center will commit to doing or that the health center is currently doing to improve performance on the measure. When responding, ensure all activities or action steps address and align with factors identified in the root cause analysis and will support the health center to improve or maintain performance on the measure.

______________________________________________________________________  
______________________________________________________________________  
______________________________________________________________________
PROMISING PRACTICES

Primary Reviewer: TBD based on Promising Practice identified
Secondary Reviewer: Optional

Authority: 45 CFR 75.301

Overview

A promising practice refers to an activity, procedure, approach, or policy that leads to, or is likely to lead to, improved outcomes or increased efficiency for health centers. Time permitting, the site visit team will use this section of the report to document any promising practices observed during the course of the site visit. **No more than two promising practices can be listed for each visit and the site visit team should be highly selective in determining whether anything rises to the level of a promising practice.**

Promising Practices may be identified in one or more of the following:
- Health Center Program requirement areas
- Health center clinical performance
- Medical, oral, and behavioral health care and/or enabling service or the integration of these services to meet the needs of the health center’s target population

Site Visit Team Methodology

- If a promising practice is identified, assign the Promising Practice to one of three major categories: 1) Clinical Services 2) Governance 3) Management and Finance
  - If applicable, select a subcategory to classify the Promising Practice type further.
  - More than one subcategory and item may be linked to the Promising Practice.
  Examples of subcategories include:
    - Behavioral Health - Mental Health
    - Preventive Health - Cancer Screening
    - Business Operations - Patient Cycle Time

- **Context section:** Clearly define the challenge or issue faced by the health center.

- **Description section:** Describe the practice that the health center implemented in seeking a solution to the challenge or issue.

- **Outcome section:** Describe the result, including the quantitative and/or qualitative measures that the health center used in determining the effectiveness of their practice.

- **Replicability section:** State whether this practice can be implemented in other health centers with the goal of having a positive impact on improving outcomes and/or increasing efficiencies. Please list any special needs or costs associated with this activity.

- Complete the “Permission to Share” and “Point of Contact” sections:
  - Ask the health center to confirm whether they will allow this practice to be shared outside of BPHC (e.g., on a public facing website) to help promote health center innovation and to encourage the peer-to-peer sharing of practices.
  - Ask the health center to identify an individual who is knowledgeable about the promising practice and list their contact information.
  - Attach any relevant documentation related to the Promising Practice that the health center is willing to share (e.g., policies, forms, patient education materials).
Site Visit Findings

1. Were any Promising Practices Identified as part of this Operational Site Visit?
   ☐ YES   ☐ NO

2. If yes, select the most appropriate category for this Promising Practice: Clinical Services, Governance or Management and Finance. Then select all subcategory elements that apply.
   ______________________________________________________________________

3. **Context:** Clearly define the challenge or issue faced by the health center:
   ______________________________________________________________________

4. **Description:** In detail, describe the practice that the health center implemented in seeking a solution to the challenge or issue:
   ______________________________________________________________________

5. **Outcome:** Describe the result, including the quantitative and/or qualitative measures that the health center used in determining the effectiveness of their practice:
   ______________________________________________________________________

6. **Replicability:** Could this practice be implemented in other health centers with the goal of having a positive impact on improving outcomes and/or increasing efficiencies? If there are special needs or costs associated with this activity, please list:
   ☐ YES   ☐ NO   ☐ NOT SURE
   Please explain:
   ______________________________________________________________________

7. Did the health center consent to allowing this practice to be shared outside of BPHC (e.g., on a public facing website)?
   ☐ YES   ☐ NO

8. Who is the best contact for further information?
   ______________________________________________________________________

9. Describe any relevant documentation related to the Promising Practice (e.g., policy, forms, patient education handout, etc.).
   ______________________________________________________________________
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.

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Most recent annual audit and management letters or audited financial statements (if audits are not available)
☐ 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 other controlling organization (if applicable)
☐ Co-applicant agreement (if applicable) (if updated since last application submission to HRSA/BPHC)
☐ Position description for the Project Director/CEO

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 Electronic Health Records (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\(^{118}\) (i.e., contracting with a single entity for the majority of health care providers)
☐ Project Director/CEO employment agreement

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

\(^{118}\) For the purposes of the Health Center Program, contracting for substantive programmatic work applies to contracting with a single entity for the majority of health care providers. The acquisition of supplies, material, equipment, or general support services is not considered programmatic work.
- Review selection of three to five health center patient records (either using live navigation of the EHR, screenshots from EHR, or actual records if the records are not electronic/EHR records) that document the provision of various Required and Additional Health 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/financial staff of the applicant organization and board members (e.g., board chair, board treasurer) regarding ownership and operation of the applicant organization.
- Review most recent annual audit and management letters or audited 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.
- Review any documents related to the applicant’s parent company, affiliate, subsidiary or other controlling organization that has a substantial role in the operations of the applicant organization (if applicable).

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 Program eligibility) 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 Project Director/CEO position description and employment agreement.
- Interview Project Director/CEO.
- Review bylaws of applicant organization.
- Review co-applicant agreement (if applicable).
- Review contracts for substantive programmatic work under the proposed health center project (if applicable).

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:
______________________________________________________________________