DATE: August 22, 2012

TO: Free Clinics
    Free Clinic Associations
    Primary Care Associations
    Primary Care Offices
    National Cooperative Agreements

I. PURPOSE

This Program Assistance Letter (PAL) provides information on the Health Resources and Services Administration’s (HRSA) alignment and consolidation of specific services listed on Form 5A: Services Provided (Form 5A). These changes are being made to align the categorization of health services on Form 5A with existing expectations regarding required and additional services and to simplify the form’s structure. These changes will become effective the week of August 27, 2012.

II. APPLICABILITY

This PAL applies to all HRSA health service delivery grants awarded under section 330(e), (g), (h), and (i) of the Public Health Service (PHS) Act and to Federally Qualified Health Center (FQHC) Look-Alike entities, collectively referred to in this document as “health centers.”

III. BACKGROUND

As described in Policy Information Notice (PIN) 2008-01: Defining Scope of Project and Policy for Requesting Changes, health centers are required to provide, either directly or through an established arrangement, a set of primary health care services. These are defined in section 330 of the PHS Act as health services related to family medicine, internal medicine, pediatrics, obstetrics and gynecology, diagnostic laboratory and radiological services, pharmaceutical services as appropriate, and defined preventive health services,
including screenings for communicable diseases. For the complete list of required services, see section 330(b)(1)(A) of the PHS Act.

Health centers may also provide “additional health services” defined as “services that are not included as required primary health services and that are appropriate to meet the needs of the population served by the health center...” (Section 330(b)(2) of the PHS Act). The specific amount and level of required and additional services will vary by health center based on a number of factors including, among others, the population served, demonstrated unmet need in the community, provider staffing, collaborative arrangements and/or licensing requirements.

Further, both required and additional services provided by a health center and the service delivery method by which they are provided must be documented on the health center’s Form 5 A: Services Provided. The list of required and additional services and their service delivery methods currently in the approved scope of project of the health center should be reviewed for accuracy and completeness at least annually, ideally during the health center’s annual application or progress report submission, and should be updated as needed via the Change in Scope module in the HRSA Electronic Handbooks (EHB) system. The health center may “self-update” certain changes to a health center’s scope and certain changes require HRSA’s prior review and approval before the health center’s scope can be changed. The process for making these changes is further described once the health center accesses the Change in Scope module in EHB; refer to the “CIS II Submission User Guide” in the “Help” section of the module.

IV. OVERVIEW OF CHANGES TO FORM 5A: SERVICES PROVIDED

Per section 330(b)(1)(A), all health centers are required to provide screenings for communicable diseases either directly or through established arrangements. In order to align the listing of services on Form 5A with this requirement and remove any instances of duplication, HRSA is consolidating relevant service categories on Form 5A for all health centers. Specifically, under “Required Services,” the category of “Screenings – Communicable Disease” will now encompass communicable disease-specific screenings previously indicated as “Additional Services.” The disease-specific screenings that are being removed from “Additional Services” and consolidated under “Screenings – Communicable Diseases” are “HIV Testing” and “Hepatitis C Screening”.

Health centers do not need to take any action regarding this change. HRSA has reviewed the Form 5A presentation for all health centers and will systematically update each form as appropriate (i.e., if a health center had previously noted the provision of “HIV Testing” and/or “Hepatitis C Screening” via one or more modes of service delivery, those modes will be correspondingly updated under “Screenings – Communicable Diseases”). HRSA will complete this systematic update for all health centers by the week of August 27, 2012. Each health center will receive an EHB notification once HRSA completes the update to the health center’s form.
Each health center is encouraged to review the updated Form 5A after receiving notification in EHB. If a health center determines it is necessary to request a change in the scope of the project as it relates to these services, it should contact its Project Officer to discuss the change.

This adjustment does not change the requirement to provide communicable disease screenings, including screenings for HIV and Hepatitis C as well as any other types of necessary communicable disease screenings appropriate for the health center’s patient or target population, either directly or through an established arrangement.

V. CONTACT INFORMATION

If you have any questions on the process outlined in this PAL, please contact the Office of Policy and Program Development at 301-594-4300 or OPPDGeneral@hrsa.gov.

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