



PROGRAM ASSISTANCE LETTER

DOCUMENT NUMBER: PAL 2013-03

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DOCUMENT TITLE: Alignment of EHB Change in Scope Module with Change in Scope Policy

TO: Health Centers
Primary Care Associations
Primary Care Offices
National Cooperative Agreements

I. PURPOSE

This Program Assistance Letter (PAL) provides information regarding updates and enhancements to the Health Center Program Change in Scope (CIS) module of the Health Resources and Services Administration's (HRSA) Electronic Handbooks (EHB) system. The CIS module in EHB facilitates a health center's request for a change to its approved scope of project and the HRSA CIS prior approval review process. These updates communicated in this PAL are intended to better align the CIS submission and review processes with existing Health Center Program scope of project policies. These changes will become effective January 31, 2013. Please see *Section V: CIS Requests Currently in Progress* below for information on additional important dates.

II. APPLICABILITY

This PAL applies to all organizations under HRSA's Health Center Program, which includes those with health service delivery grants awarded under section 330(e), (g), (h), and (i) of the Public Health Service (PHS) Act and designated Look-Alike entities, collectively referred to in this document as "health centers."

III. BACKGROUND

The following Policy Information Notices (PINs) outline policy requirements, based in the Health Center Program's authorizing statute and program and grant regulations¹, related to a health center's scope of project:

- PIN 2008-01: Defining Scope of Project and Policy for Requesting Changes

¹ Section 330 of the Public Health Service Act (42 U.S.C. §254b); 42 CFR Part 51c and 42 CFR Parts 56.201-56.604; 45 CFR Part 74.

- PIN 2009-02: Specialty Services and Health Centers' Scope of Project
- PIN 2009-05: Policy for Special Populations-Only Grantees Requesting a Change in Scope to Add a New Target Population

As stated in PIN 2008-01, a health center's scope of project defines the activities that the health center's approved project budget supports. Specifically, the scope of project defines the approved service sites, services, providers, service area(s) and target population(s) which are wholly or in part section 330 grant funds. Some changes in the approved scope of project (a "Change in Scope" or CIS) require prior approval from HRSA before being initiated; others may be implemented by the health center without prior approval. In all cases, any changes proposed and/or implemented by a health center to the approved scope of project must be documented through the EHB CIS Module, and must assure continued compliance with the applicable statutory, regulatory, and policy requirements.

The existing CIS module became effective prior to final issuance of the PINs listed above, and HRSA has received feedback from health centers, partners and HRSA staff on how to better align the CIS module. As a result, HRSA has reviewed, revised and streamlined the module – specifically the sets of questions, or "checklists," for each type of CIS request – to align more fully with current CIS policy guidance and criteria and to provide further clarification on what is required as part of the health center's CIS request submission. In implementing the enhancements presented in this PAL, HRSA will continue to follow the criteria outlined in the PINs listed above in reviewing a request to change the approved scope of project that requires prior approval.

IV. OVERVIEW OF REVISIONS AND ENHANCEMENTS TO CIS MODULE

The following key revisions and enhancements, which do not constitute a change in Health Center Program policy, have been made to the CIS module to better align it with existing scope policy guidance and criteria. HRSA has:

- Revised checklist questions to clarify the criteria health centers are required to respond to based on each type of CIS request, as well as the analysis tool HRSA staff use to review each CIS request. These clarifications should reduce the need for a project officer to request a resubmission of the original CIS request and/or additional information and will facilitate more timely review of CIS requests.
- Revised language to ensure CIS process and all accompanying documents are applicable to all health centers (grantees and look-alikes).
- Improved CIS module workflow to ensure the appropriateness and completeness of the CIS request prior to submission.
- Consolidated the requirements for the CIS Financial Impact Analysis.
- Updated information and considerations related to programs affected by CIS actions, e.g., National Health Service Corps, 340B Drug Pricing Program, Medicaid/Medicare, Federal Tort Claims Act, etc.

HRSA will continue to evaluate the benefit of additional revisions and enhancements to other components of the CIS module, including forms and processes. HRSA will communicate additional updates to health centers as decisions are made and improvements are implemented.

V. CIS REQUESTS CURRENTLY IN PROGRESS

HRSA will utilize the existing CIS system to continue the review of any CIS requests that have been submitted within that module. On January 22, 2013, HRSA will move any CIS requests that have been initiated but not submitted to HRSA to inactive status and these requests will have to be resubmitted in full within the updated CIS module to be considered by HRSA. In order to accommodate the system changes and to ensure the timely and accurate transition to the enhanced CIS module in EHB, the EHB CIS module will not be available for use by health centers between January 23, 2013, and January 30, 2013. Health centers will have the opportunity to work on new CIS requests when the enhanced CIS module goes into full effect on January 31, 2013.

VI. TECHNICAL ASSISTANCE AND CONTACT INFORMATION

HRSA will support health centers in utilizing the enhanced CIS module. Technical assistance and training information, including the updated CIS question checklists and User Guides, will be provided on the HRSA Bureau of Primary Health Care website. Targeted resources and navigational tips will also be available within the EHB CIS module.

If you have any questions on the specific revisions outlined in this PAL, please contact the Bureau of Primary Health Care (BPHC) Help Line at 1-877-974-2742 or bphchelp@hrsa.gov. If you have questions or require additional assistance regarding an individual CIS request, please contact your Project Officer.