



Guidance for Completing a Change in Scope Request to Add Transitional Care in Carceral Setting (TCCS) to Your Scope of Project

- Refer to [PIN 2024-05: Health Center Program Policy Guidance Regarding Services to Support Transitions in Care for Justice-Involved Individuals Reentering the Community](#) (PDF) and the [Scope of Project Resources](#) for further policy and process guidance.
- Contact us with any questions about your TCCS Change in Scope request through the [BPHC Contact Form](#) , in *Policy*, select:
 1. *Program Monitoring H80*
 2. *Change in Scope*
- The location of the carceral setting and the services you are proposing to provide in the carceral setting must be consistent with the criteria in [PIN 2024-05](#) (PDF) for us to approve your request. The table below explains what information we need to assess your TCCS Change in Scope request and where you can document that information.
- If we cannot adequately assess your TCCS Change in Scope request using the information you provide, we will **not** approve your request.
- **If relevant facts (including contracts, billing, and medical records) indicate that your health center is acting on behalf of the carceral authority and not on behalf of your health center, HRSA will not approve your TCCS Change in Scope request.**

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Information Needed to Assess Your TCCS Change in Scope Request	Where to Document
<p>Identify what type of carceral authority (for example, is it operated by state or local government) operates the carceral setting where you will provide in-scope transitional care services.</p> <ul style="list-style-type: none"> <i>An allowable carceral setting is the prison, jail, correctional facility, juvenile justice facility, or other facility where a JI-R individual is incarcerated or detained by state or local government.</i> <i>An allowable carceral authority is a local or state government that is responsible for the care and custody of the JI-R individual. You must have a MOA/MOU with an allowable carceral authority.</i> <p>Note: Health centers may not provide in-scope health center services to JI-R individuals in the care and custody of the Federal Government, even if they are in the same carceral setting as those in the care and custody of a state or local government</p>	<p>Within the attached MOA/MOU with the carceral authority.</p> <p>Clearly mark or highlight where in the MOA/MOU this is documented.</p> <p>You may attach additional supporting documentation identifying the carceral authority.</p>
<p>Confirm that the physical address for the carceral setting is located in your HRSA-approved service area or adjacent areas.</p> <p>Notes:</p> <ul style="list-style-type: none"> The TCCS location’s physical address must be in your health center’s service area or in an area adjacent to your health center’s service area. You will not be able to add zip codes to your health center’s service area through this TCCS Change in Scope (CIS) request. 	<p>Can be documented in written response.</p> <p>Note: HRSA will review the zip code of the carceral setting and compare it to service area zip code data reported across your current Form 5B: Service Sites.</p>

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<p>Confirm that you will only provide transitional care services to JI-R individuals:</p> <ul style="list-style-type: none"> • During the 90-day period prior to their scheduled or expected release. • Without an official expected or scheduled release date for a period no longer than 90 days, where the health center has a reasonable understanding that the individual will likely be released within 90 days. <p>This includes individuals in pretrial detention during a 90-day time period notwithstanding the absence of an official expected or scheduled release date.</p> <p>Note: Health centers may not provide in-scope health center services to JI-R individuals in the care and custody of the Federal Government, even if they are in the same carceral setting as those in the care and custody of a state or local government.</p>	<p>Within the attached MOA/MOU with the carceral authority.</p> <p>Clearly mark or highlight the language that documents the transitional care timeframe for services.</p>
<p>Discuss how providing transitional care in a carceral setting will benefit your target population.</p>	<p>Can be documented in written response.</p>
<p>Document that your governing board has approved the location(s) and the service(s) offered by your health center for JI-R individuals in a carceral setting.</p> <p>Specifically address how your governing board:</p> <ul style="list-style-type: none"> • Retains authority over the provision of all health center services at any location where in-scope transitional care services are provided to JI-R individuals; and • Determines which services will be provided at the carceral setting (services must be within the list of allowable services in Section VII. Allowable In-Scope Services to Support Transitions to Care for Justice-Involved Individuals Reentering the Community (PDF)). 	<p>Can be documented in written response.</p> <p>You may also attach board minutes to support your response.</p>

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<p>Discuss what specific services will be provided in the carceral setting. Confirm that they are within the list of the allowable services in Section VII. Allowable In-Scope Services to Support Transitions to Care for Justice-Involved Individuals Reentering the Community (PDF).</p> <p>Note: If you will add any new services as part of providing transitional care in carceral settings, you must submit a Change in Scope request to add these new services to your scope of project (as documented on Form 5A: Services). All services provided to JI-R individuals must also be available to all residents of your service area.</p>	<p>Within the attached MOA/MOU with the carceral authority.</p> <p>Clearly mark or highlight the language that documents what specific services will be provided by your health center in the carceral setting to JI-R individuals.</p>
<p>Discuss how you will deliver in-scope transitional care services at the carceral setting.</p> <ul style="list-style-type: none"> • Specifically address how these services will be delivered by health center staff in accordance with your health center’s policies and procedures. • If you will provide services through contracts or formal written referral arrangements with other organizations, discuss how your governing board approves these contracts or formal written referral arrangements to provide services at the carceral setting. 	<p>Can be documented in written response.</p>
<p>Discuss, if applicable, how you will bill for services provided at the carceral setting (for example, your state has a Medicaid demonstration waiver for JI populations).</p>	<p>Can be documented in written response.</p>

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<p>Discuss how you will apply your board-approved sliding fee discount scale or board-approved policy for waiving charges to individuals served in the carceral setting.</p> <p>Notes:</p> <ul style="list-style-type: none"> • As with all in-scope services, health centers must ensure they are providing services to all patients regardless of insurance status or ability to pay. • It is acceptable for a health center’s patient fee and payment waiver policy to include, as a specific circumstance for waiving fees, those patients who are JI-R individuals scheduled for release from incarceration or detention up to 90 days from the date of health center service, and for those JI-R individuals without an official expected or scheduled release date, for a time period of no longer than 90 days, where the health center has a reasonable understanding that the individual will likely be released within 90 days. • A health center must assess each individual for income and family size—even when a fee and payment waiver apply and must seek reimbursement from third-party payors (such as Medicaid or private insurance) when such reimbursement is available. Refer to Health Center Program Compliance Manual Chapter 16: Billing and Collections. 	<p>Can be documented in written response.</p>

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<p>Document how you will establish and maintain your own health records related to the in-scope transitional care services provided to JI-R individuals served at the carceral setting.</p> <p>Highlight specific terms in the MOA/MOU where the exchange of appropriate patient medical information with the carceral authority is addressed in order to ensure continuity of care.</p> <p>Highlight specific terms in the MOA/MOU related to patient care coordination between your health center and the carceral authority. For example, mechanisms for distribution of health center-prescribed medications during hours in which the health center provider is not on site at the carceral setting.</p>	<p>Within the attached MOA/MOU with the carceral authority.</p> <p>Clearly mark or highlight the language that documents how you will maintain your own health records for JI-R individuals served in the carceral setting and how you will engage in care coordination with the carceral authority as needed.</p>
<p>Discuss how you will ensure that the JI-R individuals you serve in the carceral setting will have access to all of your in-scope services upon release and for as long as the individuals continue to reside in the community served by your health center.</p>	<p>Can be documented in written response.</p>
<p>Discuss how you connect JI-R individuals who will not reside in your service area after release, to other primary care providers in the community where the individuals will reside.</p>	<p>Can be documented in written response.</p>