

# **Program Assistance Letter**

**DOCUMENT NUMBER: 2020-06** 

**DOCUMENT TITLE:** Calendar Year 2021 Federal Tort Claims Act (FTCA) Deeming Sponsorship Application for Free Clinics

**TO:** Free Clinics

DATE: August 3, 2020

Free Clinic Associations Primary Care Associations Primary Care Offices

National Cooperative Agreements

# I. PURPOSE

This Program Assistance Letter (PAL) supersedes PAL 2019-04 and provides guidance on the Calendar Year (CY) 2021 Free Clinics Federal Tort Claims Act (FTCA) Program deeming sponsorship application process for liability protections pursuant to section 224(o) of the Public Health Service (PHS) Act, 42 U.S.C. § 233(o), including FTCA coverage for the performance of medical, surgical, dental, or related functions. This PAL contains instructions for free clinics on how to apply for deemed PHS employment ("FTCA deemed status") for CY 2021 on behalf of their free clinic volunteer health care professionals, board members, officers, employees, and individual contractors.

To obtain such protections for these individuals, free clinics that meet the statutory standards in section 224(o) must submit an annual FTCA deeming sponsorship application on their behalf to the Health Resources and Services Administration (HRSA), which administers the Free Clinics FTCA Program. HRSA documents its deeming determination through a written notice of deeming action (NDA). FTCA coverage does not extend to other alleged negligent acts or to the acts or omissions of the free clinic entities, which are not eligible for coverage, and is subject to all of the requirements set forth in section 224. Please see the <a href="Free Clinics FTCA Program Policy Guide">Free Clinics FTCA Program Policy Guide</a> for further information.

HRSA's Electronic Handbooks (EHBs) system will be available to begin receiving CY 2021 redeeming sponsorship applications on August 14, 2020. Redeeming sponsorship applications for CY 2021 coverage are due no later than October 9, 2020. Initial and supplemental deeming sponsorship applications (to add new personnel) may be submitted through the EHBs throughout the calendar year.

# II. DEEMING SPONSORSHIP APPLICATION PROCEDURES AND THE FREE CLINIC ELECTRONIC HANDBOOK SYSTEM

FTCA coverage under the Free Clinics FTCA Program does not occur automatically and is not retroactive. FTCA coverage is effective for a specifically named eligible individual and for a specified time period only after HRSA approves a deeming application submitted by a sponsoring free clinic on behalf of such individual (*See* 42 U.S.C. 233(o); <u>Free Clinics FTCA Program Policy Guide</u>). HRSA requires that all deeming sponsorship applications be submitted using HRSA's EHBs.

Free clinics must submit a complete deeming sponsorship application through HRSA's EHB's in order to sponsor eligible individuals for deemed Public Health Service employment (See 42 U.S.C. 233(o); Free Clinics FTCA Program Policy Guide.). Applications require that the appropriate free clinic representative(s) electronically sign by typing his or her name in the appropriate field and upload all required documentation, including the sponsoring free clinic's nonprofit status, quality improvement/quality assurance (QI/QA) plan, risk management documentation, primary source verification of licensure and/or certification as applicable, and an explanation of any medical malpractice claims or any disciplinary actions taken against an eligible individual during a specified time period. Further details are found in Appendix A. The required information must be uploaded as attachment files within the online deeming sponsorship application form.

### A. INITIAL DEEMING SPONSORSHIP APPLICATIONS

Free clinics that apply to the Free Clinics FTCA Program must have a Data Universal Numbering System (DUNS) number<sup>1</sup> and be registered within the System for Award Management (SAM).

If your free clinic does not have a DUNS number, you may apply for a DUNS number online at <a href="https://fedgov.dnb.com/webform">https://fedgov.dnb.com/webform</a>. There are no fees associated with obtaining a DUNS number from Dun and Bradstreet. There are no fees associated with the SAM registration process. These steps must be completed in order to create an account and submit an initial deeming sponsorship application via the EHBs.

Technical assistance for obtaining a DUNS number and registering with SAM can be found at the following:

- Dun & Bradstreet, 800-234-3867; and
- SAM.gov, 866-606-8220.

Initial deeming sponsorship applications may be submitted through EHBs throughout the calendar year. The initial deeming sponsorship application must be submitted through the EHBs at: <a href="https://grants.hrsa.gov/webexternal/">https://grants.hrsa.gov/webexternal/</a>.

The initial deeming sponsorship application requires a free clinic to provide information to demonstrate that it has fulfilled all applicable requirements, including:

<sup>&</sup>lt;sup>1</sup> A DUNS number is a unique nine-digit identification number for each physical location of your business. DUNS Number assignment is free for all businesses required to register with the federal government for contracts or grants.

- 1) Contact information for the sponsoring free clinic;
- 2) Location and manager(s) of free clinic's sites (i.e., sites owned/operated by the free clinic where qualifying health services are provided);
- 3) Assurance that the sponsoring free clinic and individuals sponsored for deeming status meet the statutory eligibility criteria;
- 4) Description of the free clinic's credentialing and privileging systems;
- 5) Description of the free clinic's risk management systems;
- 6) List of all individuals (i.e., volunteer health care professionals, board members, officers, employees, and individual contractors) who the free clinic is sponsoring for FTCA deemed status;
- 7) Evidence that each licensed or certified individual was credentialed and privileged by the sponsoring free clinic on an initial and/or recurring basis (for example, every two years), including the specific dates such actions were taken and primary source verification of licensure/certification<sup>2</sup>; and
- 8) Assurance that all volunteer health professionals are licensed or certified to provide health care services.

In addition to addressing the requirements noted above, an initial deeming sponsorship application must include the following attachments:

- a. Documentation of non-profit status;
- b. QI/QA plan with either a signature of an authorized board representative that notes the date of board approval or a dated copy of board minutes, with appropriate signature(s), documenting approval (either method of submission must evidence that approval was undertaken on a recurring basis, for example, every three (3) years);
- c. Description of any and all (1) state board disciplinary actions and (2) filed state or federal court (and including any FTCA) malpractice claims against the free clinic and/or its sponsored eligible individuals within ten (10) years prior to the submission of the application (including pending claims), and a brief statement of whether the clinic implemented risk management activities as needed in response to allegations, and to prevent further claims from occurring in the future; and
- d. Affirmation signature (entered as an electronic signatures) by the Executive Director of the sponsoring free clinic that all statements and assertions made by the application are true under penalty of perjury.

# **B.** REDEEMING SPONSORSHIP APPLICATIONS

Free clinics that currently sponsor deemed individuals must reapply annually for continued FTCA coverage. The annual redeeming sponsorship application must be submitted through the EHBs at https://grants.hrsa.gov/webExternal/.

The redeeming sponsorship application requires a free clinic to provide the same core information as required in the initial deeming sponsorship application in order to demonstrate that it has fulfilled all statutory requirements (please see attached application for detailed program requirements), including:

<sup>&</sup>lt;sup>2</sup> All volunteer health professionals must be currently licensed or certified to provide qualifying health care services at the free clinic. All state licensed or certified health professionals, including employees, contractors, and volunteers, need to be credentialed and privileged.

- 1) Documentation of non-profit status;
- 2) Contact information for the sponsoring free clinic;
- 3) Location and manager(s) of free clinic sites;
- 4) Assurance that the sponsoring free clinic and individuals for whom deeming is sought meet the statutory eligibility criteria;
- 5) Description of the free clinic's credentialing and privileging systems;
- 6) Description of the free clinic's risk management systems;
- 7) List of all individuals (i.e., volunteer health care professionals, board members, officers, employees, and individual contractors) whom the free clinic is sponsoring for FTCA deemed status;
- 8) Evidence that each licensed or certified individual was credentialed and privileged by the sponsoring free clinic on an initial and/or recurring basis (for example, every two years), including the specific dates such actions were taken and primary source verification of licensure/certification<sup>3</sup>; and
- 9) Assurance that all volunteer health professionals are licensed or certified to provide health care services.

In addition to addressing the requirements noted above, a redeeming sponsorship application must include the following attachments:

- a. QI/QA plan with either a signature of an authorized board representative that notes the date of board approval or a dated copy of board minutes, with appropriate signature(s), documenting approval (either method of submission must evidence that approval was undertaken on a recurring basis, for example, every three (3) years);
- b. Description of any and all (1) state board disciplinary actions and (2) filed state or federal court (and including any FTCA) malpractice claims against the free clinic and/or its sponsored eligible individuals within five (5) years prior to the submission of this application (including pending claims), and a brief statement of whether the clinic implemented risk management activities as needed in response to allegations, and to prevent further claims from occurring in the future; and
- c. Affirmation signature (entered as an electronic signature) by the Executive Director of the sponsoring free clinic that all statements and assertions made by the application are true under penalty of perjury.

Redeeming sponsorship applications for CY 2021 coverage are due by October 9, 2020. Failure to meet the deadline for submission of a redeeming sponsorship application will result in a requirement to submit an initial deeming sponsorship application.

### C. SUPPLEMENTAL DEEMING SPONSORSHIP APPLICATIONS

During the course of the calendar year, sponsoring free clinics may wish to add additional eligible individuals as deemed PHS employees for purposes of FTCA coverage. In order to request coverage for eligible individuals, a supplemental deeming sponsorship application must be completed, submitted, and approved by HRSA. We strongly encourage sponsoring free clinics to include multiple individuals on a supplemental deeming sponsorship application to expedite the review and approval process. The supplemental deeming sponsorship application must be submitted through the EHBs at:

-

<sup>&</sup>lt;sup>3</sup> See footnote #2.

# https://grants.hrsa.gov/webExternal/.

A supplemental deeming sponsorship application form requires:

- 1) Contact information for the sponsoring free clinic;
- 2) Assurance that the sponsoring free clinic and individuals for whom deeming is sought meet the statutory eligibility criteria;
- 3) Assurance that the free clinic has maintained its credentialing, privileging, and risk management systems, or a description as to how the system(s) has been modified;
- 4) List of all additional individuals (i.e., volunteer health care professionals, board members, officers, employees, and individual contractors) whom the free clinic is sponsoring for deemed employment status;
- 5) Evidence that each licensed or certified individual was credentialed and privileged by the sponsoring free clinic on an initial and/or recurring basis (for example, every two years), including the specific dates such actions were taken and primary source verification of licensure/certification<sup>4</sup>; and
- 6) Assurance that all volunteer health professionals are licensed or certified to provide healthcare services.

In addition to addressing the requirements noted above, a supplemental deeming sponsorship application must include the following:

- a. An uploaded copy of the new QI/QA plan (**only** if it has changed since the most recent original or redeeming deeming application);
- b. Description of any and all (1) state board disciplinary actions and (2) filed state or federal court (and including any FTCA) malpractice claims against the new sponsored eligible individuals within ten (10) years prior to the submission of this application (including pending claims), and a brief statement of whether the clinic implemented risk management activities as needed in response to allegations, and to prevent further claims from occurring in the future; and
- c. Affirmation signatures (entered as an electronic signature) by the Executive Director of the sponsoring free clinic that all statements and assertions made by the application are true under penalty of perjury.

# III. CALENDAR YEAR DATA COLLECTION

Free clinics participating in the Free Clinics FTCA Program are required to submit an annual data report as part of their annual redeeming sponsorship application within the EHBs. Redeeming sponsorship applications will not be considered complete if the annual data report section is not completed. As in previous years, for the recently closed calendar year, free clinics are required to report (1) the total number of FTCA-deemed individuals (including practitioners, board members, and officers); (2) the total number of FTCA-deemed providers; and (3) the total number of presumptively "FTCA-covered" patient visits conducted by FTCA-deemed providers. For reporting purposes, patient visits must be:

- 1) Face-to-face contacts between a patient and a deemed provider;
- 2) Documented in a medical record maintained by the free clinic; and
- 3) Compliant with all applicable Free Clinics FTCA Program requirements.

\_

<sup>&</sup>lt;sup>4</sup> See footnote #2.

The annual data report must be submitted with the redeeming sponsorship application by October 9, 2020.

### IV. GENERAL APPLICATION SUBMISSION INSTRUCTIONS

To streamline the FTCA deeming sponsorship application submission and processing, free clinics must submit the deeming sponsorship application within the EHBs. Please do not submit a printed and scanned version of the application form. Supplemental deeming sponsorship applications must contain names of new individuals requested to be added to the listing of deemed individuals by a sponsoring free clinic and only have currently deemed individuals if the relationship between the free clinic and those individuals is being updated, such as with a change in role or specialty.

All initial, redeeming, and supplemental deeming sponsorship applications require an uploaded attachment explaining disciplinary actions and claims related to the performance of medical, surgical, dental, and related functions alleged against the eligible individuals applying for deeming and a brief statement of whether the clinic implemented appropriate risk management activities in response. Documentation related to a medical malpractice claim must include: an explanation of the suit or allegation, medical specialty involved, and a brief statement of whether the clinic implemented appropriate risk management actions as needed in response to such allegations to reduce the risk of future malpractice and future such claims. Documentation related to a disciplinary action must include: nature and reason for the disciplinary action; timeframe (where applicable); documentation from the appropriate professional board that states the individual is in good standing and/or a description of any practice restrictions on the licensee. This information is required for the past ten (10) years for initial and supplemental sponsorship applicants and five (5) years for redeeming sponsorship applicants. Do not upload a report from the National Practitioner Data Bank (NPDB), as these reports do not describe the actions taken by the sponsoring free clinic in response to the claims and may disclose other information not required for this purpose.

If the deeming sponsorship application is incomplete or additional verification of information is required, the Executive Director and FTCA Contact listed on the application will both be contacted via email. The sponsoring free clinic will have ten (10) business days from the date of notification to submit the requested information to complete its application. If the requested information is not received within the 10 day time period, individuals sponsored by the free clinic may not be deemed and those sponsored on a redeeming sponsorship application may not be deemed by January 1, 2021, and therefore may experience a gap in coverage.

# V. CONTACT INFORMATION

For programmatic support regarding the Free Clinics FTCA Program, application requirements, and technical/EHBs support, please contact:

Health Center Program Support Phone: 1-877-464-4772, Option 1 Web form: <a href="https://bphccommunications.secure.force.com/ContactBPHC/BPHC">https://bphccommunications.secure.force.com/ContactBPHC/BPHC</a> Contact Form 8:00 a.m. to 5:30 p.m. ET, Monday through Friday (except Federal holidays)

/James Macrae/

James Macrae Associate Administrator Bureau of Primary Health Care

# APPENDIX A FREE CLINICS FTCA PROGRAM APPLICATION

The following tables provide the information that will be collected in the initial, redeeming, and supplemental deeming sponsorship applications through the EHBs:

Section I. Contact Information*	
<b>Executive Director</b>	
• First Name:	
• Last Name:	
• E-mail:	
• Phone Number:	
<ul><li>Fax Number:</li></ul>	
Medical Director	
• First Name:	
• Last Name:	
• E-mail:	
• Phone Number:	
<ul><li>Fax Number:</li></ul>	
Risk Management	
Coordinator	
• First Name:	
• Last Name:	
• E-mail:	
• Phone Number:	
<ul><li>Fax Number:</li></ul>	
FTCA Contact	
• First Name:	
• Last Name:	
• E-mail:	
• Phone Number:	
• Fax Number:	
*Upload state documentation	indicating legal name change if legal name change
occurred since last deeming sp	onsorship application.

Section II. Site Information	
• Name:	
<ul><li>Address:</li></ul>	
• Phone Number:	
• Fax Number:	
• E-mail:	
• Site Type:	
<ul> <li>Days/Hours of Operations:</li> </ul>	
*All free clinic sites must be listed. Each site must be appropriately identified as the main site or as an additional site.	

Section III. Sponsoring Free Clinic Eligibility
1. The sponsoring free clinic is a registered nonprofit organization. (Please attach
documentation if an initial applicant.)
[]Yes
LJ
2. The sponsoring free clinic and its sponsored individuals comply with the definitions
relative to covered individuals (employees, contractors, volunteer health
professionals, and board member and officers) as set forth in section III, "Covered Individuals", of the Free Clinics FTCA Program Policy Guide.
Yes
3. The free clinic does not accept reimbursement from any third-party payor (including
but not limited to reimbursement from an insurance policy, health plan, or other
Federal or State health benefits program).
[] Yes
4. The free clinic does not impose charges on patients either based on service provided
or the ability to pay. (The free clinic may accept only volunteer donations from patients
and other third parties.)
[] Yes
5. The free clinic is licensed or certified in accordance with applicable law regarding
the provision of health services.
[] Yes
No (If no, then explain)
6. The free clinic and/or individual health care professional provides each patient with
a written notification explaining that the legal liability of the deemed individual is
limited pursuant to section 224(o) of the Public Health Service Act, 42 U.S.C. 233(o).
[] Yes
[]
Section IV. Credentialing and Privileging Systems*
1. The free clinic verifies licensure, certification, and/or registration of each
licensed and/or certified individual according to the instructions in the Free Clinics
FTCA Program Policy Guide. (Please remember all volunteer health professionals
must be licensed or certified to be eligible for deeming.)
[] Yes
2. The free clinic has a copy of the current license, certification, and/or registration on
file at the free clinic for each licensed and/or certified individual. (Please remember all
volunteer health professionals must be licensed or certified to be eligible for deeming.)
[] Yes
3. If the free clinic contracts with a Credentialing Verification Organization (CVO) for
CVO services, there is a written contractual agreement stating the specifics of these
services.
[] Yes
[] N/A
4. The free clinic utilizes peer review activities when it privileges each licensed and/or
certified individual according to the instructions in the Free Clinics FTCA Program
Policy Guide.
[]Yes
[]

Section IV. Credentialing and Privileging Systems*
5. The free clinic annually reviews any history of prior and current medical malpractice
claims for each individual for whom deeming is sought.
[] Yes
6. A National Practitioner Data Bank (NPDB) query is obtained and evaluated on a
recurring basis (for example, every two years) for each licensed and/or certified
individual according to the instructions in the Free Clinics FTCA Program Policy Guide.
Note: do NOT submit a copy of the NPDB report for any individual to HRSA.
[] Yes
7. Name and contact information of the person and organization conducting
credentialing/privileging.
Enter the name and contact information in the Comments section of this question.
*Required for initial deeming and redeeming sponsorship applications. Required for
supplemental deeming sponsorship applications if the free clinic has changed its
credentialing and privileging system since the annual deeming sponsorship application.

	Section V. Risk Management Systems*
1. The	free clinic maintains and implements policies and procedures for the provision
of app	ropriate supervision and back-up of clinical staff.
[] Yes	
[] No (	(If no, then explain)
2. The	free clinic maintains a medical record for each patient receiving care
from it	s organization.
[] Yes	
	(If no, then explain)
3. The	free clinic has policies and procedures that address:
a. Tr	iage [] Yes [] No
	alk-in patients [] Yes [] No
c. Te	lephone triage [ ] Yes [ ] No
If No fo	or any of the above, then explain.
4. The	free clinic has protocols that identify appropriate treatment and diagnostic
	ures based on current standards of care.
[]Yes	
[] No (	(If no, then explain)
	free clinic has a tracking system for patients who miss appointments or require
follow-	up of referrals, hospitalization, diagnostics (for example, x-rays), or laboratory
results	
[]Yes	
[] No (	(If no, then explain)
6. The	free clinic periodically reviews patients' medical records to verify quality,
comple	eteness, and legibility of written entries.
[]Yes	
[] No (	(If no, then explain)
7. The	free clinic has a written, current QI/QA plan that clearly addresses the clinic's
	tialing and privileging process and has been signed by a board authorized
repres	entative on a recurring basis (for example, every three (3) years) (please attach a
_	f the plan with documentation of hoard approval including date of approval)

[] Yes		
[] No (If no, then	n explain)	
8. The free clini	8. The free clinic has regular, periodic meetings to review and assess quality assurance	
issues.		
[] Yes (If yes, bi	riefly describe the structure (e.g., frequency of meetings, individuals required	
to attend, etc.) of	The committee that meets periodically to review and assess quality assurance	
issues.)		
[] No (If no, then	n explain)	
9. The free clinic	c considers findings from its peer review activities when reviewing	
and/or revising		
	xplain what information and process is utilized by the clinic when updating and	
revising the QI/Q		
[] No (If no, then	n explain)	
10. The free clin	nic utilizes quality assurance findings to modify policies to improve	
patient care.		
[] Yes		
[] No (If no, then	1 /	
11. The free clin	nic's FTCA-deemed individuals annually participate in risk	
	ntinuing education activities.	
	riefly describe the annual risk management educational activities that are	
available to healt	1	
[] No (If no, then		
	nic has assured that each individual sponsored for FTCA deemed status	
	e Free Clinics FTCA Program Policy Guide, and that his/her questions	
regarding FTC	A medical malpractice coverage have been addressed.	
[] Yes		
[] No (If no, then	n explain)	
	nitial deeming and redeeming sponsorship applications. Required	
	al deeming sponsorship applications if the free clinic has changed	
its QI/QA Plan	since the annual redeeming sponsorship application.	

Section VI. Free Clinic Volunteer Health Care Professionals, Board Members, Officers,	
Employees, and Individual Contractors*	
Add Individual Details	
• Prefix:	
• First Name:	
Middle Name:	
• Last Name:	
• Professional Designation:	
Contact Information	
• Email Address:	
• Phone Number:	
• Fax Number:	
<ul><li>Mailing Address:</li></ul>	

Roles and Specialty	
• Role(s) in Free Clinic:	
Specialty:	
• Others:	
Individual Type (select one):	
New Applicant	
Renewal Applicant	
Service Type	
Clinical Work activities	
(Individuals that provide clinical	
care or participate in the	
supervision and oversight of	
clinical care)	
Non-Clinical Activities	
(Individuals who conduct purely	
non-clinical or administrative	
activities)	
Both Clinical and Non-Clinical	
(Individuals who conduct both	
clinical and non-	
clinical/administrative activities)	
,	
Please select the status of the	
individual from the options below:	
• Employee	
Individual contractor	
Officer/Governing Board	
Member	
Licensed or Certified Health	
Professional Volunteer	
Credentialing and Privileging	
Date of Licensure/Certification	
Expiration	
Is Licensure/Certification	
Currently Active? Yes/No. If No,	
please stop here. Select N/A if	
this individual is not licensed or	
certified.	
• Date of Last Credentialing:	
Date of Last Privileging: [Please]	
remember that all state licensed	
and/or certified health	
professionals need to be	
credentialed and privileged on a	
recurring basis (for example,	

every two years). Not mandatory for 'Board Members' and 'Executive' role.]	
Upload primary source verification of current licensure and/or certification. (Upload attachment.)	
Medical Malpractice Claims or Disciplinary Actions (against the individual): [ ] Yes [ ] No [ ] N/A	
Enter Your Comments  Comments: (Comments and an attachment with an explanation of each medical malpractice claim or disciplinary action are required for individuals where medical malpractice claims or disciplinary actions are indicated. Do NOT submit an NPDB report for any individual.)	

- Provide a list of ALL free clinic volunteer health professionals, board members, officers, employees, and individual contractors on whose behalf the free clinic is submitting an application for FTCA deemed status. Please note that free clinic volunteer health professionals must be licensed and/or certified by state or federal law to perform the services that are requested.
- Provide a physical address for ALL individuals on whose behalf the free clinic is submitting an application for FTCA deemed status. Physical addresses and phone numbers provided for individuals must be personal mailing addresses that are different than that of the clinic.
- Specify the role in the free clinic for any individual the free clinic is sponsoring for FTCA deemed status. For each individual sponsored for deeming, disclose past medical malpractice claims or disciplinary actions for the past ten (10) years if submitting an initial or supplemental deeming sponsorship application or for the past five (5) years for redeeming sponsorship applications.
- List the professional designation (for example: MD, NP, LPN) for all licensed and/or certified individuals for any individual the free clinic is sponsoring for FTCA deemed status. If the individual is not licensed and/or certified and does not have a professional designation, then enter "N/A" for "not applicable."
- Attach an explanation of each medical malpractice claim or disciplinary action (to include probationary actions) including explanations of the suit or allegation, medical specialty

involved, and a brief statement of whether the clinic implemented appropriate risk management actions as needed in response to allegations to reduce the risk of future malpractice and future such claims. Documentation related to a disciplinary action must include: nature and reason for the disciplinary action; timeframe (where applicable); documentation from the appropriate professional board that states the individual is in good standing and/or a description of any practice restrictions on the licensee. Do NOT submit an NPDB report for any individual.

Section VII. Patient Visit Data*	
1. Total number of Free Clinics FTCA Program deemed	
individuals, in the recently closed calendar year:	
2. Total number of Free Clinics FTCA Program deemed	
providers, in the recently closed calendar year:	
3. Total number of patient visits conducted by Free	
Clinics FTCA Program deemed providers, in the	
recently closed calendar year:	
*Only required for the annual redeeming sponsorship application	n.

#### **Section VIII. Attachments**

# **Attachment A. Non-Profit Documentation (Maximum 5)**

Required for initial and redeeming sponsorship

# Attachment B. Copy of Clinic's QI/QA Plan (Maximum 5)

Attach the free clinic's QI/QA Plan that has been approved, signed, and dated by a board authorized representative on a recurring basis (for example, every three (3) years):

- Required for initial deeming and redeeming sponsorship applications.
- Required for supplemental deeming sponsorship applications if the free clinic has changed its QI/QA Plan since the annual redeeming sponsorship application.

# **Attachment C. Medical Malpractice Claims and Disciplinary Actions**

Attach an explanation of each medical malpractice claim or disciplinary action (to include probationary actions) including explanations of the suit or allegation, medical specialty involved, and a brief statement of whether the clinic implemented appropriate risk management actions as needed in response to allegations to reduce the risk of future malpractice and future such claims. Documentation related to a disciplinary action must include: nature and reason for the disciplinary action; timeframe (where applicable); and documentation from the appropriate professional board that states the individual is in good standing and/or a description of any practice restrictions on the licensee. Do not submit an NPDB report for any individual.

# **Attachment D. Other supporting Documentation (Maximum 5)**

Please attach any other supporting documentation.

Section IX. Remarks	
Are you interested in receiving FREE access to the Clinical Risk Management	
website? Registration provides you with continuing medical education training	
opportunities, sample policies and tools, e-newsletters covering current topics in	
patient safety and risk management, and more!	
*You may opt out of receiving email notifications at any time by contacting:	
<u>freeclinicsftca@hrsa.gov.</u>	
[] Yes	
[ ] No	

Section X. Signatures
Certification and Signature
I,(Executive Director)*, certify that this sponsoring free clinic
meets the definition of a free clinic found in Section III of the HRSA/BPHC Free
Clinics FTCA Program Policy Guide and that the information in this application and
the related attachments is complete and accurate.
*The application must be signed by the Executive Director, as indicated Section I.
Contact Information.