

Health Center Designation Changes and Impacts on Uniform Data System (UDS) Reporting

All health centers under the Health Center Program must report all in-scope activities for the entire calendar year (January 1 – December 31) in the UDS Report, if funded or designated for the full year or any time before October 1 of the calendar year. The following provides UDS reporting definitions and guidance through a series of frequently asked questions (FAQ).

KEY DEFINITIONS

Health Center Program Award Recipients: Health centers that receive federal award funds under the Health Center Program (HCP) authorized by section 330 of the Public Health Service (PHS) Act (42 U.S.C. 254b)

Health Center Program Look-Alikes: Health centers that do not receive federal grant funding under section 330 of the PHS Act, but meet the Health Center Program requirements for look-alike designation under the HCP (authorized by 42 U.S.C. 1395x(aa)(4)(A)(ii) and 42 U.S.C. 1396d(l)(2)(B)(ii))

In-Scope: Reflects all approved activities in the HRSA health center scope of project, as defined in approved applications shown in the Notice of Award/Designation

New Access Point (NAP): A newly approved, full-time, permanent service delivery site

New Service Site: Any location where a health center, either directly or through a subrecipient or other established arrangement (i.e., contract), provides primary health care services to a defined service area or target population as specified in [Form 5B: Service Sites](#)

New Services: Services that are newly added to a health center's scope of project and reflected on the Notice of Award/Designation and [Form 5A: Services Provided](#)

New Start: An organization that received competitive funding as a health center for the first time during the calendar year for the provision of comprehensive primary health care services to underserved populations

Scope of Project: Service sites, services, providers, service area, and special medically underserved populations served by a health center

FREQUENTLY ASKED QUESTIONS (FAQ)

This FAQ outlines common questions and answers pertaining to several scenarios that may affect UDS reporting related to:

- [New Health Center Award or Designation](#)
- [New Services or Sites](#)
- [Health Center Organizational Changes](#)

New Health Center Award or Designation

Q: My health center was recently awarded 330 funding or designated as a look-alike for the first time. Do we need to report data for the full calendar year, even though we received this award/designation after the start of the performance year?

A: Review the health center's Notice of Award/Designation to identify the exact start date of federal award or designation. If your health center was awarded funding (regardless if grant funds were used) or designated before October 1 of the calendar year, the health center will report on all approved in-scope activities for the entire calendar year (January 1 – December 31) in the UDS.

If your health center was awarded funding or designated for the first time on or after October 1, a UDS Report will not be filed by the health center, and the health center will not have access to the UDS Report in the Electronic Handbooks (EHBs) for that calendar year.

Q: We were previously designated as a look-alike, but recently awarded section 330 funding, changing our status to a health center recipient. Do our UDS reporting requirements change?

A: The UDS reporting requirements are the same for look-alikes and health center recipients. What type of UDS Report the health center completes will depend on when the look-alike converted to health center recipient status and the type(s) of funding received. If the conversion took place prior to October 1, the health center will submit the UDS Universal Report as a recipient, along with UDS Grant Report(s) if the health center received multiple section 330 funding types, for the full calendar year (January 1 – December 31). If the conversion takes place on or after October 1, the health center will submit a UDS Report as a look-alike for the full calendar year and will submit a UDS Report as a 330 recipient the following year. The EHBs will automatically update to show the correct UDS Report that the health center needs to complete. The date of conversion will be indicated in the Grant Folder in EHBs.

New Services or Sites

Q: How should we report on new services added to our scope in the calendar year?

A: If the health center received scope of project approval to provide new services (documented on [Form 5A: Services Provided](#)) the health center will need to report data for the new services for the full calendar year (January 1–December 31) on the UDS Report.

Q: We added a new site to our scope of project, but this site was formerly a private practice and we are not able to retrieve data for the full calendar year. What should we do?

A: All health centers must submit data for new service delivery sites listed on [Form 5B: Service Sites](#), added into their approved scope of project, and shown in the Notice of Award/Designation. Submit data for approved in-scope activities for the new service delivery site beginning on the date of the scope change or the additional site award start date. If the health center is unable to include the new site data as of the date of scope change or site award site start date, note the limitation in the EHBs UDS Report Comment field. Failure to provide the required data may result in the UDS Report being rated as questionable.

Q: We have service delivery sites that were closed during the calendar year or sites or services that were removed from our scope of project. Do we still report data for these sites or services in the UDS Report?

A: If services or service delivery sites are removed from your scope of project during the calendar year, report on all activities (patients, services, visits, clinical care, personnel, revenue, and costs) that were provided up until the date HRSA officially acknowledged the removal from your approved scope of project.

Health Center Organizational Changes

Q: My health center merged with or was acquired by another Health Center Program recipient this year, resulting in a HRSA-approved Successor-in-Interest (SII). Do we both need to complete separate UDS Reports? What steps are needed to comply with the reporting requirements?

A: The responsibility for UDS reporting is dependent on the date of acquisition or merger. Instructions are provided for recipients below.

Transfer Type	Prior to October 1	On or After October 1
Recipient SII	- Transferors who are purchased and acquired by another health center (the transferee) to complete a merger will not submit a UDS Report for that calendar year if the official date of the merger or acquisition occurs before October 1. - The transferee (acquiring health center) will be responsible for completing a combined UDS Report, which must accurately capture all the acquired	When a health center merges with another health center on or after October 1, both the transferor and transferee are responsible for submitting separate UDS Reports, each reflecting their separate in-scope calendar year activities.

	health center's UDS data for in-scope activities provided up until the acquisition completion date.	
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Q: What do we do if the health center we acquired used a different Electronic Health Record (EHR) system and we are not able to migrate their data into our EHR?

A: The successor or acquiring health center is required to report a combined UDS Report with full calendar year (January 1–December 31) data. To complete the UDS Report as accurately as possible, the successor health center personnel will need to be able to access and report on data housed in the acquired health center's EHR system. The successor health center is to establish a process to pull and transfer data from the acquired health center's EHR system during the merger process.

When combining data between two or more EHR systems to complete a UDS Report that represents all entities' data, implement validation steps to ensure that patient counts, activities, and other required data are fully accounted for and unduplicated (e.g., ensure that patients are only counted in the denominator once for applicable clinical quality measures).

If it is not possible to pull and transfer data from the acquired health center's EHR system, please complete the UDS Report to the best of your ability with the data you have. Clearly explain missing data and its impact on any affected tables using the EHBs UDS Report and/or Table Comment field.

Q: What steps should we take if my health center relinquishes its grant? Are we still required to submit a UDS Report?

A: Health centers that cease operations or whose designation or funding ends (such as grant relinquishment, closure, bankruptcy, award termination, etc.) during the calendar year, must still complete the UDS Report to fulfill reporting requirements for the applicable calendar year. Health centers should ensure that patient-, service-, and financial-related data are accurately recorded and maintained in electronic health records and practice management systems through the final day of providing services to patients.

To accommodate these unique situations, additional processes, such as the use of the Preliminary Reporting Environment (PRE), have been established. This process ensures compliance with federal requirements while addressing the logistical challenges faced by non-operational health centers (e.g., absence of an active workforce, limited ad hoc personnel). This practice is essential to support the accurate and complete submission of the UDS Report, even if the health center ceases operations prior to the opening of the UDS reporting module in the EHBs in January. Health centers will be able to enter their data into the PRE beginning in the fall and should plan to submit their calendar year UDS Report starting January 1. Data that is entered into the PRE will be automatically pushed into the live environment as of January 1 of the reporting year.

Use the [BPHC Contact Form](#) (UDS Reporting/UDS Reporting/Completing and Submitting Performance Reports in EHBs) to notify HRSA:

- Of health center relinquishment of grant or designation.
- If health center personnel will have departed and/or there are no remaining employees on-site with the appropriate credentials to access and finalize the UDS Report beginning January 1 to be provided submission guidance.
- If the health center either cannot or does not choose to report their performance calendar year UDS data in EHBs, such as when the PRE isn't open yet on the last day of serving patients or their EHBs access has been revoked. In these cases, health centers must complete the report before February 15 of the reporting year using the [UDS Tables in Excel](#) file and submit the UDS Report through the [BPHC Contact Form](#). Data submitted in this format will not be included in the final UDS dataset for the calendar year.