



Service Area Competition (SAC) Fiscal Year (FY) 2025 Applicant Webinar: Compliance Review

April 2024

Office of Policy and Program Development

Health Resources & Services Administration (HRSA)/Bureau of Primary Health Care (BPHC)

Vision: Healthy Communities, Healthy People



Agenda

SAC Compliance Assessment Overview

SAC Elements Commonly Out of Compliance

Compliance Assessment Review Correspondence Request (CR) Process

Period of Performance

Compliance Resources



SAC Compliance Assessment Overview

- HRSA assesses health centers for Health Center Program compliance on a regular basis, including during the SAC application review.
- SAC applicants are required to provide information related to Health Program Requirements through the Project Narrative questions, attachments, and forms.
- Refer to the SAC Compliance Assessment Guide (located at the SAC technical assistance webpage) for the Compliance Manual chapters and elements that correspond to application components described in Appendix A.



- [NOFO](#)
- [Health Center Program Compliance Manual](#)



Health Center Program Requirements



SAC Elements Commonly Out of Compliance

- Billing and Collections h. Policies or Procedures for Waiving or Reducing Fees
- Sliding Fee Discount Program e. Incorporation of Current Federal Poverty Guidelines (FPG)
- Sliding Fee Discount Program c. Sliding Fee for Column I Services
- Sliding Fee Discount Program b. Policies
- Board Composition c. Current Board Composition
- Budget a. Budgeting for Scope of Project



Common SAC Compliance Issues (1/3)

Compliance Manual Requirement	Compliance Issue	NOFO Compliance Reference(s)
<p><i>Billing and Collections h. Policies or Procedures for Waiving or Reducing Fees</i></p>	<ul style="list-style-type: none"> - Documentation describing health center policies or procedures for waiving or reducing fees due to a patient's inability to pay are missing 	<p>Appendix A: Health Center Program Compliance – Billing and Collections</p>
<p><i>Sliding Fee Discount Program e. Incorporation of Current Federal Poverty Guidelines (FPG)</i></p>	<ul style="list-style-type: none"> - Attachment 10: Sliding Fee Discount Schedule(s) is missing - Attachment 10 does not reflect the current FPG (as of application submission date) or does not include family income breakdown 	<p>Appendix A: Health Center Program Compliance – Sliding Fee Discount Program</p>



Common SAC Compliance Issues (2/3)

Compliance Manual Requirement	Compliance Issue	NOFO Compliance Reference(s)
<p><i>Sliding Fee Discount Program c. Sliding Fee for Column I Services</i></p>	<ul style="list-style-type: none"> - Missing Attachment 10: Sliding Fee Discount Program(s) - Attachment 10 was submitted without indicating that there are “no discounts” for families with annual incomes above 200% of current FPG 	<p>Appendix A: Health Center Program Compliance – Sliding Fee Discount Program</p>
<p><i>Sliding Fee Discount Program b. Policies</i></p>	<ul style="list-style-type: none"> - Board-approved definition of family size and income is not included 	<p>Appendix A: Health Center Program Compliance – Sliding Fee Discount Program</p>



Common SAC Compliance Issues (3/3)

Compliance Manual Requirement	Compliance Issue	NOFO Compliance Reference(s)
<i>Board Composition c. Current Board Composition</i>	<ul style="list-style-type: none"> - Form 6A: Board Characteristics is not completed as instructed or does not reflect current board member information 	<ul style="list-style-type: none"> - Appendix A: Health Center Program Compliance – Governance: Board Composition - Form 6A: Board Characteristics (PDF)
<i>Budget a. Budgeting for Scope of Project</i>	<ul style="list-style-type: none"> - Missing Personnel Justification Table - For Continuing Competition ONLY: SF-424A is missing projected budgets for Year 2 and Year 3 	<ul style="list-style-type: none"> - NOFO Section iii: Budget - SF-424A: Budget Information Form (PDF) - Budget Narrative Sample



Compliance Assessment Review Correspondence Request (CR)



Compliance Assessment Review Correspondence Request (CR)

- In circumstances where a competitive continuation or competing supplement is found to be non-compliant with one or more elements of Health Center Program requirements, you will be given 14 calendar days to submit documentation demonstrating compliance with program requirements prior to final award decisions.
- The goal of the SAC Correspondence Request (CR) process is to provide applicants with an opportunity to correct identified program compliance elements prior to SAC award while ensuring objectivity and neutrality of interactions with applicants.



Compliance Assessment Review Correspondence Request (CR) Process

- I. The HRSA Reviewer will contact your health center's Authorizing Official (AO)*** through the HRSA Electronic Handbooks (EHBs) using a feature called "Correspondence Request (CR)" that enables the HRSA Reviewer to request additional information on any areas of non-compliance.
- II. The CR requests will appear in the AO's EHBs Pending Tasks list as "Urgent Application Correspondence" tasks and the AO will also be notified through an EHBs-generated email.*** As indicated in the CR, you will have up to 14 calendar days to respond with additional information demonstrating compliance. There are no extensions or exceptions.
- III. HRSA Reviewers will also contact your AO by phone when a CR is sent.*** The purpose of this phone contact is to ensure the AO has received and reviewed the request, specify the reason for the compliance finding(s) based on the content of the application, and answer questions the AO may have related to the request.
- IV. When your AO receives a CR, respond to this task via EHBs as soon as possible, prior to the due date since no deadline extension will be provided.*** Information shared via methods other than the EHBs CR submission (e.g., phone calls, emails) will NOT be considered in HRSA's final compliance assessment.



Period of Performance Determination

The SAC Correspondence Request (CR) process is necessary to determine the organization's eligibility for a SAC award and provides applicants with an opportunity to correct identified compliance elements prior to award.

- ***A 3-year period of performance will be awarded to:***
 - Competing continuation applicants with no conditions at SAC award decision time
 - Competing supplement applicants with no conditions at SAC award decision time
- ***A 1-year period of performance will be awarded to:***
 - New applicants
 - Competing continuation applicants with conditions at SAC award decision time
- HRSA will ***not*** make a SAC award to a competing continuation applicant that was awarded a 1-year period of performance in FY 2023 and FY 2024, and meets the criteria for a third 1-year period of performance in FY 2025



SAC Compliance Resources

Resource	URL
Health Center Program Compliance Manual	Health Center Program Compliance Manual
FY 2025 SAC Notice of Funding Opportunity	FY 2025 SAC Notice of Funding Opportunity
FY 2025 SAC Compliance Assessment Guide	FY 2025 SAC Compliance Assessment Guide
FY 2025 SAC Applicant Compliance Webinar	<i>Recording:</i> SAC FY 2025 Applicant Webinar: Compliance Review
Compliance Questions	BPHC Contact Form



Thank You!

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Compliance Evaluation and Support (CES)
Bureau of Primary Health Care (BPHC)
Health Resources and Services Administration (HRSA)



[BPHC Contact Form](#)



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