

# **Health Center Program Site Visit Protocol:**

## **Key Management Staff**

*Last updated: February 27, 2020*

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# KEY MANAGEMENT STAFF

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**Primary Reviewer:** Governance/Administrative Expert  
**Secondary Reviewer:** Fiscal and Clinical Expert (as needed)

**Authority:** Section 330(k)(3)(H)(ii), and 330(k)(3)(I)(i) of the Public Health Service (PHS) Act; 42 CFR 51c.104(b)(4), 42 CFR 51c.303(p), 42 CFR 56.104(b)(5), and 42 CFR 56.303(p); and 45 CFR 75.308(c)(1)(ii)(iii)

## Document Checklist for Health Center Staff

### Documents Provided Prior to Site Visit:

- Health center organization chart(s) with names and titles of key management staff (if updated since last submission to HRSA)
- Position descriptions of key management staff (if updated since last submission to HRSA)
- Bios or resumes for key management staff (if updated since last application submission to HRSA)
- Co-applicant agreement (if applicable) (if updated since last application submission to HRSA)
- Human Resources procedures relevant to recruiting and hiring of key management staff (if applicable, for health centers with key management staff vacancies)

### Documents Provided at the Start of the Site Visit:

- Project Director/CEO employment agreement
- Project Director/CEO's Form W-2 or, if a Form W-2 has not yet been issued, documentation of receipt of salary directly from the health center (for example, pay stub)
- Contracts for key management staff (if applicable)
- Documentation associated with filling key management staff vacancies (if applicable) (for example, job advertisements, revised position descriptions)

## Demonstrating Compliance

### Element a: Composition and Functions of Key Management Staff

The health center has determined the makeup of and distribution of functions among its key management staff<sup>1</sup> and the percentage of time dedicated to the Health Center Program project for each position, as necessary to carry out the HRSA-approved [scope of project](#).

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<sup>1</sup> Examples of key management staff may include Project Director/CEO, Clinical Director/Chief Medical Officer, Chief Financial Officer, Chief Operating Officer, Nursing/Health Services Director, or Chief Information Officer.

## Site Visit Team Methodology

- Review Form 2: Staffing Profile and review the position descriptions or contracts for key management staff from the most recent Service Area Competition (SAC)/Renewal of Designation (RD) application, and if applicable, review any new job descriptions.
- Review the health center organization chart(s).
- Interview various members of the health center's key management staff to determine how key functions are distributed and carried out.

## Site Visit Findings

1. Was the health center able to justify how the distribution of functions and allocation of time for each key management position is sufficient to carry out the approved scope of the health center project (for example, Is there a clear justification for a part-time Project Director/CEO or for the lack of a dedicated CFO position)?

YES       NO

If No, an explanation is required, including describing why the distribution of functions and allocation of time for each key management position is insufficient to carry out the scope of project:

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## Element b: Documentation for Key Management Staff Positions

*The health center has documented the training and experience qualifications, as well as the duties or functions, for each key management staff position (for example, in position descriptions).*

## Site Visit Team Methodology

*N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its review of the competing continuation application (SAC or RD). No onsite review of this element is required.*

## Site Visit Findings

*N/A – HRSA assesses whether the health center has demonstrated compliance with this element through its review of the competing continuation application (SAC or RD). No onsite review of this element is required.*

## Element c: Process for Filling Key Management Vacancies

The health center has implemented, as necessary, a process for filling vacant key management staff positions (for example, vacancy announcements have been published and reflect the identified qualifications).

## Site Visit Team Methodology

- Review health center organization chart(s) and compare to current key management staff. Note if there are any vacancies.
- If a key management staff vacancy is noted, review Human Resources procedures relevant to recruiting and hiring of key management staff and interview person(s) responsible for health center hiring/Human Resources functions and documentation associated with filling the vacancy.

## Site Visit Findings

2. Does the health center have any vacant key management positions?  
 YES       NO
3. **If Yes:** Will or has the health center implement(ed) a process for filling this position?  
 YES       NO       NOT APPLICABLE

If No, an explanation is required, including specifying which position(s) are vacant:

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## Element d: CEO Responsibilities

The health center's Project Director/CEO<sup>2</sup> is directly employed by the health center,<sup>3</sup> reports to the health center's governing board<sup>4</sup> and is responsible for overseeing other key management staff in carrying out the day-to-day activities necessary to fulfill the HRSA-approved scope of project.

## Site Visit Team Methodology

- Review health center organization chart(s).
  - Review position descriptions or contracts for key management staff and, if necessary, any other documentation of key management reporting structures.
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<sup>2</sup> While the position title of the key person who is specified in the award/designation may vary, for the purposes of the Health Center Program, [the Health Center Program Compliance Manual [Chapter 11: Key Management Staff](#) utilizes] the term "Project Director/CEO" when referring to this key person. Under 45 CFR 75.2, the term "Principal Investigator/Program Director (PI/PD)" means the individual(s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. For the purposes of the Health Center Program, "Project Director/CEO" is synonymous with the term "PI/PD."

<sup>3</sup> Public agency health centers utilizing a co-applicant structure would demonstrate compliance with the statutory requirement for direct employment of the Project Director/CEO by demonstrating that the public agency, as the Health Center Program awardee/designee of record, directly employs the Project Director/CEO. Refer to related requirements in [Health Center Program Compliance Manual] [Chapter 19: Board Authority](#) regarding public agencies with co-applicants.

<sup>4</sup> Refer to related requirements in [Health Center Program Compliance Manual] [Chapter 19: Board Authority](#) regarding the selection and dismissal of the Project Director/CEO by the health center board as part of its oversight responsibilities for the Health Center Program project.

- Review the Project Director/CEO's Form W-2 or, if a Form W-2 has not yet been issued by the health center, documentation of receipt of salary directly from the health center.
- For public agencies with a co-applicant board, review the co-applicant agreement.
- Interview Project Director/CEO.

## Site Visit Findings

4. Is the Project Director/CEO directly employed by the health center as confirmed by a Form W-2 (or, if a Form W-2 has not yet been issued by the health center, documentation of receipt of salary directly from the health center such as a pay stub)?

**Note:** *The Project Director/CEO is directly employed by the health center if the Project Director/CEO: (1) receives a salary directly from the health center; (2) is issued a W-2 that lists only the health center as the Project Director/CEO's employer; and (3) has an employment agreement entered into with the health center that outlines the activities required to be performed by the Project Director/CEO.*

YES       NO

If No, an explanation is required:

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5. Does the Project Director/CEO report to the health center board?

**Note:** *In a public center with a co-applicant board where the public center employs the Project Director/CEO, the Project Director/CEO may report both to the co-applicant board and to another board or individual within the public agency.*

YES       NO

If No, an explanation is required:

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6. Does the Project Director/CEO oversee other key management staff in carrying out the day-to-day activities of the health center project?

YES       NO

If No, an explanation is required:

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## Element e: HRSA Approval for Project Director/CEO Changes

If there has been a post-award change in the Project Director/CEO position,<sup>5</sup> the health center requests and receives prior approval from HRSA.

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<sup>5</sup> Such changes include situations in which the current Project Director/CEO will be disengaged from involvement in the Health Center Program project for any continuous period for more than 3 months or will reduce time devoted to the project by 25 percent or more from the level that was approved at the time of award [see: 45 CFR 75.308(c)(1)(ii) and (iii)].

## Site Visit Team Methodology

- Determine whether there has been a change in the Project Director/CEO since the start of the current project or designation period.
  - o If yes, review prior approval documentation submitted to HRSA.

## Site Visit Findings

7. Has there been a change in the Project Director/CEO position since the start of the current project or designation period?

**Note:** *This ONLY includes situations in which the Project Director/CEO was disengaged from involvement in the project for any continuous period for more than 3 months or reduced time devoted to the project by 25 percent or more from the level that was approved at the time of award.*

YES       NO

8. **If Yes:** Was the health center able to produce documentation of its request for prior approval and the related approval from HRSA (unless still under review by HRSA) for this change?

YES       NO       NOT APPLICABLE

If No, an explanation is required:

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