

Health Center Program Site Visit Protocol:

Eligibility Requirements for Look- Alike Initial Designation Applicants

Last updated: August 20, 2018

Table of Contents:

ELIGIBILITY REQUIREMENTS FOR LOOK-ALIKE INITIAL DESIGNATION APPLICANTS	131
Document Checklist for Health Center Staff.....	131

ELIGIBILITY REQUIREMENTS FOR LOOK-ALIKE INITIAL DESIGNATION APPLICANTS

Primary Reviewer: Governance/Administrative Expert

Secondary Reviewer: N/A

Authority: Sections 1861(aa)(4)(b) and 1905(l)(2)(B) of the Social Security Act.

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

- Most recent annual audit and management letters or audited financial statements (if audits are not available)
- Health center organization chart(s) with names of key management staff
- Corporate organization chart(s) (only applicable for public agencies or for organizations with a parent or subsidiary)
- Agreements with parent corporation, affiliate, subsidiary or other controlling organization (if applicable)
- Co-applicant agreement (if applicable) (if updated since last application submission to HRSA/BPHC)
- Position description for the Project Director/CEO

Documents Provided at the Start of the Site Visit:

- Health center selection of three to five health center patient records (e.g., using live navigation of the Electronic Health Records (EHR), screenshots from the EHR, or actual records if the records are not electronic/EHR records) that document the provision of various Required and Additional Services
- Sample of up to three Medicare or Medicaid claims or other billing documents that demonstrate under what organizational entity or unit billing is conducted
- Contracts for substantive programmatic work¹¹⁸ (i.e., contracting with a single entity for the majority of health care providers)
- Project Director/CEO employment agreement

Site Visit Team Methodology

- Confirm that applicant is currently delivering primary care services through tour of service delivery sites (one or more sites as listed on Form 5B); and

¹¹⁸ For the purposes of the Health Center Program, contracting for substantive programmatic work applies to contracting with a single entity for the majority of health care providers. The acquisition of supplies, material, equipment, or general support services is not considered programmatic work.

- Review selection of three to five health center patient records (either using live navigation of the EHR, screenshots from EHR, or actual records if the records are not electronic/EHR records) that document the provision of various Required and Additional Health Services.

Site Visit Findings

1. Is the applicant **currently delivering primary health care services** to patients within the proposed service area?
 YES NO

If No, an explanation is required:

Site Visit Team Methodology

- Interview CFO/financial staff of the applicant organization and board members (e.g., board chair, board treasurer) regarding ownership and operation of the applicant organization.
- Review most recent annual audit and management letters or audited financial statements of the applicant organization.
- Review Medicare or Medicaid claims or other billing documents that demonstrate under what organizational entity or unit billing is conducted.
- Review bylaws of applicant organization, and if applicable, the co-applicant agreement for public agency applicants with a co-applicant governing board.
- Review any documents related to the applicant's parent company, affiliate, subsidiary or other controlling organization that has a substantial role in the operations of the applicant organization (if applicable).

Site Visit Findings

2. Was the applicant (i.e., the organization applying for look-alike designation) able to document that it currently **owns and controls the organization's assets and liabilities** (for example, the applicant organization does not have a sole corporate member, is not a subsidiary of another organization)?
 YES NO

If No, an explanation is required:

3. Does the applicant have safeguards in place to ensure the benefits that accrue through look-alike designation as a Federally Qualified Health Center (FQHC) (for example, FQHC payment rates, 340B Drug Pricing Program eligibility) will only be distributed to the Health Center Program project?
 YES NO

If No, an explanation is required:

Site Visit Team Methodology

- Review applicant's current organization chart(s).
- Review Project Director/CEO position description and employment agreement.
- Interview Project Director/CEO.
- Review bylaws of applicant organization.
- Review co-applicant agreement (if applicable).
- Review contracts for substantive programmatic work under the proposed health center project (if applicable).

Site Visit Findings

4. Was the applicant (i.e., the organization applying for look-alike designation) able to document that it operates the Health Center Program project (i.e., the services and activities included in the look-alike application)?

YES NO

If No, an explanation is required:

5. Does the look-alike applicant organization have a Project Director/CEO in place who carries out independent, day-to-day oversight of health center activities (i.e., the services and activities included in the look-alike application), solely on behalf of the governing board of the applicant organization?

YES NO

If No, an explanation is required:
