

Recording Suites, Floors or Buildings on Form 5B to document Scope of Project

Health centers must accurately document service sites on Form 5B: *Service Sites*, if the location(s) meets the definition of a service site as further defined in PIN 2008-01: *Defining Scope of Project and Policy for Requesting Changes*. This includes all health center sites which are operated directly by the health center, or on behalf of a health center via a subrecipient or contractor. The purpose of this resource is to clarify when and how health centers need to identify a suite/floor/building as part of the Form 5B physical site address.

In instances where a health center is the sole occupant of a building and where it provides only services that are in its approved scope of project, the building's physical site address should be recorded on Form 5B. If the health center expands its capacity in the building in the future but still meets these criteria, and the listed physical site address remains accurate as previously listed, then no further Form 5B listings, or changes are needed.

In instances where a health center operates a service site within a larger building or campus where some areas are not owned or operated by the health center and/or where some services being provided by the health center are not within the HRSA approved scope of project, the health center must record each part(s) of the building, facility and/or campus as a separate Form 5B service site.

Examples of when Separate Form 5B Listings are required:

- A health center provides in-scope pediatric services in one suite of a building and provides in-scope adult services in another suite in the same building. There are two entry points for patients, and there are out of scope activities and non-health center providers and organizations operating out of the building. The health center would record both suites on its Form 5B as separate sites. For example: "1 Main St., Suite 100" and "1 Main St., Suite 205."
 - If the building does not assign suite numbers, the health center would provide an appropriate distinguishing clarification in the physical street addresses on each Form 5B listing. For example: "4 Main St., Pediatric Suite" and "4 Main St., Adult Suite."
- A health center provides services in separate buildings that are part of a larger campus. There are activities on the campus that are not part of the health center's scope of project. The health center would record the separate buildings on its Form 5B as separate sites. For example: "2 Main St., Building #5" and "2 Main St., Building #10."

Examples of when Separate Form 5B Listings are NOT required:

- A health center provides services in a building that has one main entrance but then separate areas for conducting in-scope behavioral health, primary care, and oral health services. The health center is the only occupant of the building. The health center would only record the site once on its Form 5B, as "3 Main St."

- A health center provides services in a building that has one floor. The health center then builds a second floor on the building where it will also provide in-scope services. The health center remains the only occupant of the building. The health center would only record the site once on its Form 5B, as “4 Main St.”
- A health center provides in-scope services in several suites on the first floor of a building; all of the suites are physically connected and there is one single entry point. The health center would only record the site once on its Form 5B, as “5 Main St, First Floor.”

CIS requests to record separate suites, floors or buildings

Instructions for adding a site within the same building or complex/campus that meets the definition of a service site are described in scope of project resources and information at:

<http://bphc.hrsa.gov/about/requirements/scope/index.html>

As described in the criteria above, if the health center is creating a new physical site address, it must submit a change in scope request. If corrections that would not result in the addition of a new physical site address are necessary for an existing Form 5B listing, please consult your BPHC Project Officer.

This guidance is intended to assist with the accurate recording of service sites on Form 5B for the purpose of documenting the health center’s scope of project. Resources on recording services on Form 5A are available at: <http://bphc.hrsa.gov/about/requirements/scope/index.html>.

For questions related to any billing or licensing requirements, health centers are responsible for contacting their state Medicaid Agencies, Primary Care Associations and/or Medicare Administrative Contractors, as appropriate.