



# Bureau of Primary Health Care Change In Scope Overview

February 20, 2014

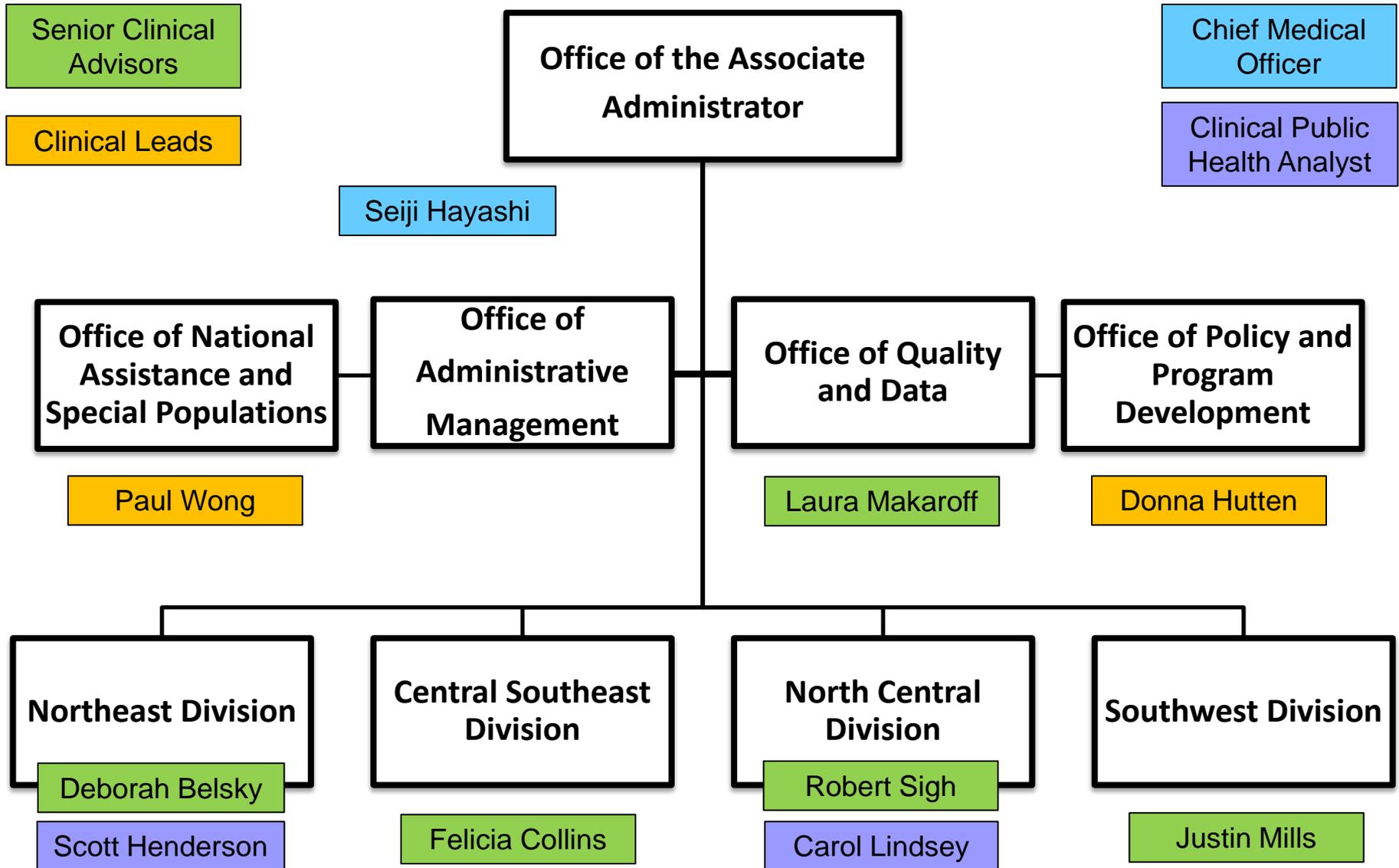
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U.S. Department of Health and Human Services  
Health Resources and Services Administration  
Bureau of Primary Health Care



# Bureau of Primary Health Care (BPHC) Organizational Structure





# Session Overview



- What is a Scope of Project?
- How does a health center change the Scope of Project?

**Q. Have you ever been involved a CIS request at your health center?**



# What is Scope of Project?



Defines the activities that the project budget supports.

- Service Sites
- Services
- Providers
- Service Areas
- Target Populations



# Why is Scope of Project Important?



- Defines the services, sites, providers, target population, and service area for which grant funds have been approved.
- Scope of project is connected to:
  - FTCA program (medical malpractice)
  - 340B Drug Pricing Program
  - State Medicaid payment rates (PPS/APM)
  - FQHC Medicare all-inclusive rate



# CIS Considerations/Criteria



- ✓ No additional 330 funding needed
- ✓ Does not shift resources away from required services
- ✓ Furthers health center mission
- ✓ Fully consistent with Health Center Program policies
- ✓ Provides for appropriate credentialing and privileging of providers
- ✓ Continues to serve MUA/MUP
- ✓ Does not result in diminution of the current total level of service or quality
- ✓ Has Board approval
- ✓ Does not significantly affect neighboring health centers
- ✓ Occurs in a setting of stable staff, financial position and operations consistent with program requirements



# Approval Levels for Change in Scope Requests



No HRSA Approval or Update Needed	Self-update to Scope of Project	Formal Request to Change Scope of Project
<p>Example:</p> <ul style="list-style-type: none"><li>• Change providers</li><li>• Add a service (that is already in scope) to an existing site</li></ul>	<p>Example:</p> <ul style="list-style-type: none"><li>• Change hours of operation</li><li>• Change the number of intermittent sites</li></ul>	<p>Example:</p> <ul style="list-style-type: none"><li>• Add a new service</li><li>• Delete a service</li></ul>



# Formal CIS Requests to Add New Services



1. Know your scope of project – be familiar with what is on your Form 5A
2. Determine whether a formal CIS is appropriate (per criteria on slide 6- including cost analysis)
3. Determine the type of service
  - Required
  - Additional
  - Specialty
4. Determine service delivery method
  - By the Health Center directly
  - By others through formal arrangements
5. Consult with your Project Officer
6. Submit a CIS request (if necessary)



# Form 5A Snapshot

## (Required Services)



Clinical Services: Service Type	Service provided directly by applicant	Service provided by formal written contract/agreement (Applicant pays for service)	Service provided by formal written referral arrangement/agreement (Applicant DOES NOT pay)
General Primary Medical Care			
Diagnostic Laboratory			
Diagnostic X-Ray			
Screenings - Cancer			
Screenings - Communicable Diseases			
Screenings - Cholesterol			
Screenings - Blood Lead Test for Elevated Blood Lead Level			
Screenings - Pediatric Vision, Hearing, and Dental			
Emergency Medical Services			
Voluntary Family Planning			
Immunizations			
Well Child Services			
Gynecological Care			
Obstetrical Care			
Prenatal and Perinatal Services			
Preventive Dental			
Referral to Behavioral Health <sup>1</sup>			



# Form 5A Snapshot

## (Additional Services)



Clinical Services: Service Type	Service provided directly by applicant	Service provided by formal written contract/agreement (Applicant pays for service)	Service provided by formal written referral arrangement/agreement (Applicant DOES NOT pay)
Urgent Medical Care			
Dental Services - Restorative			
Dental Services - Emergency			
Behavioral Health - Treatment/Counseling			
Behavioral Health - Developmental Screening			
Behavioral Health - 24-Hour Crisis			
Substance Abuse Services			
Comprehensive Eye Exams and Vision Services			
Recuperative Care			
Environmental Health Services			
Occupational Health - Screening for Infectious Diseases <sup>2</sup>			
Occupational Health - Injury Prevention Programs <sup>2</sup>			
Occupational Therapy			
Physical Therapy			



# Service Delivery Methods



## 1. By Health Center Directly (HC Pays)

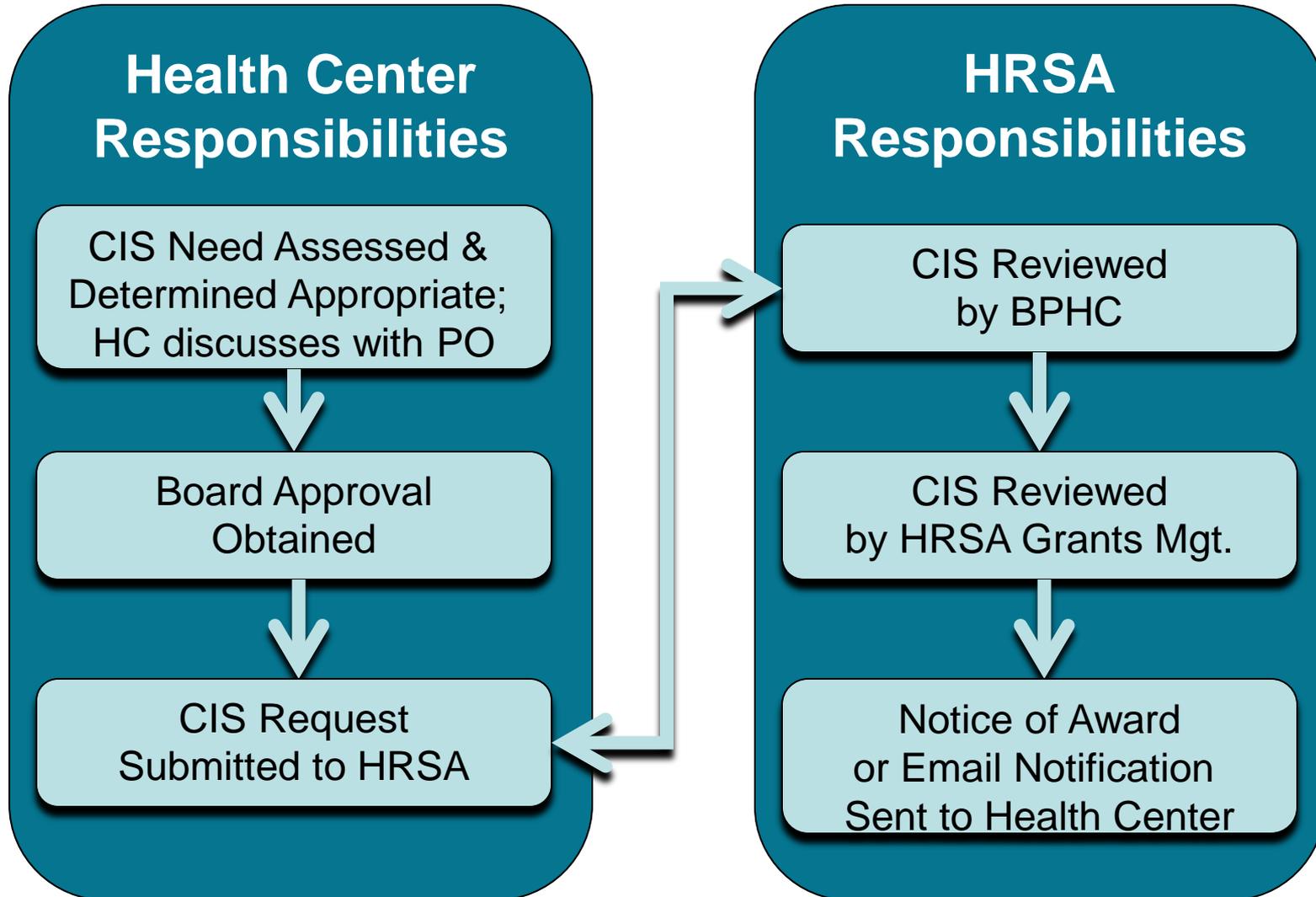
e.g. Patient seen by health center employee at health center site

## 2. By Contract (HC Pays)

e.g. Patient seen by an independent ophthalmologist that is contracted by the health center to see health center patients at a non-health center site

## 3. By Formal Referral (HC does not pay)

e.g. Patient referred by health center to a community mental health center with its own funding, insurance, or other payment sources. (Patients still offered sliding fee scale if uninsured)





# A Case Study: CMO's Role in the CIS Request Process



# ACME Health Center



- Sites in Scope: 4 (2 CHCs, 1 HCH, 1 SBHC)
- Current Clinical Services in Scope: Family Medicine, Pediatrics, Internal Medicine, Ob/Gyn, Dental, Substance Abuse
- Employees: 125 (14 PCPs, 1 Ob/Gyn, 3 Dentists, 1 PsyD, 1 Lic. Counselor, )
- Patients:
  - 16,000: <200%FPL (93%), R/E Minority (62%), Homeless (1,255)
  - HTN (25%), DM (14%), Obesity (32%), Tobacco (28%), Asthma/COPD (4%), Depression (24%)



## CIS Specialty Service Request to Add Cardiology Services

- Need: High burden of cardiovascular disease. Long wait times for referral consultations.
- Service: General cardiology services. No invasive procedures that require special equipment and staff (e.g. Cath/EP/TEE/Stress echo).
- Location: At existing site already in scope



# Summary



- Scope of project definition
- CIS considerations/criteria
- Importance of scope of project
- Types of CIS requests
- CIS request process



# Resources



1. Specialty Services & Health Centers' Scope of Project, Policy Information Notice 2009-02:  
<http://www.bphc.hrsa.gov/policiesregulations/policies/pin200902purpose.html>
2. Defining Scope of Project & Policy for Requesting Changes, Policy Information Notice 2008-01:  
<http://bphc.hrsa.gov/policiesregulations/policies/pin200801change.html>
3. Checklist for Adding a New Service to Scope:  
<http://www.bphc.hrsa.gov/policiesregulations/policies/addnewservice.pdf>
4. Clarification of Credentialing & Privileging Policy Outlined in PIN 2001-16:  
<http://bphc.hrsa.gov/policiesregulations/policies/pin200222.html>
5. Federal Tort Claims Act (FTCA) Health Center Policy Manual, Policy Information Notice 2011-01:  
<http://www.bphc.hrsa.gov/policiesregulations/policies/pin201101.html>
6. Health Center Program Governance, Policy Information Notice 2014-01:  
<http://bphc.hrsa.gov/policiesregulations/policies/pin201401.html>
7. Health Center Program Policies About PINs & PALs:  
<http://bphc.hrsa.gov/policiesregulations/policies/index.html>



# Questions?



# Thank you!



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