



Look-Alike Initial Designation (LAL-ID) Overview and Application Process

December 2024

What is a Health Center Program Look-Alike (LAL)?

Health Resources and Services Administration (HRSA), Bureau of Primary Health Care (BPHC)

Vision: Healthy Communities, Healthy People



Before You View This Presentation

- Read the <u>Instructions</u> (PDF)
 - Pay special attention to the Eligibility section
- Watch <u>At the Heart of a Health Center</u> video (4 minutes)
- Explore how to <u>Become a Health Center</u>





Presentation Agenda

- Health Center Program Overview
- Look-Alike Overview
- What's Involved in Applying
- Application Process, Components, and Timeline
- Eligibility Requirements
- Health Center Program Requirements
- Changes from Previous Instructions
- Tips and Resources





Health Center Program Overview





Overview: The Health Center Program



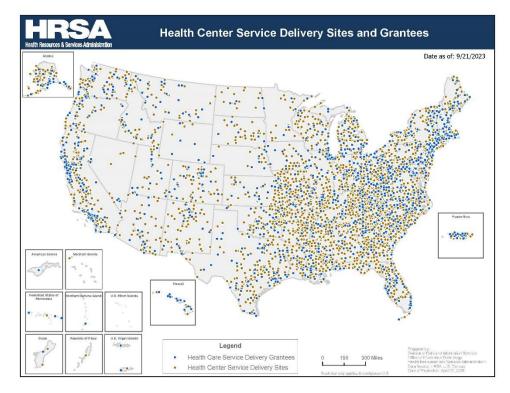
Improve the health of the nation's underserved communities and vulnerable populations by assuring access to comprehensive, culturally competent, quality primary health care services





Health Center Program Fast Facts

- Nearly 1,400 health centers and more than 100 Health Center Program look-alike (LAL) organizations operate more than 15,000 service delivery sites
- More than 31 million patients
- Health centers provide patient-centered,
 comprehensive, integrated care by offering a range of services:
 - Primary medical, oral, and mental health services
 - Substance use disorder and Medications for Opioid Use Disorder (MOUD)
 - Enabling services such as outreach, case management, health education, interpretation services, and transportation





Health Center Program Special Populations

Section 330 of the Public Health Service Act:

- Community Health Centers: Section 330(e)
- Migratory and Seasonal Agricultural Workers: Section 330(g)
- Health Care for the Homeless: Section 330(h)
- Public Housing Primary Care: Section 330(i)





Health Center Program Fundamentals



Serve High Need Areas

 Serve a high need community or population (for example, a HPSA, MUA/P)



Patient Directed

 Private non-profit or public agency that is governed by a patientmajority community board



Comprehensive

 Provide comprehensive primary care and enabling services (e.g., education, outreach, and transportation services)



No One is Turned Away

• Services are **available to all** with fees adjusted based upon ability to pay



Collaborative

 Collaborate with other community providers to maximize resources and efficiencies in service delivery



Accountable

 Meet performance and accountability requirements regarding administrative, clinical, and financial operations



The Health Center Program is authorized under Section 330 of the Public Health Service (PHS) Act.



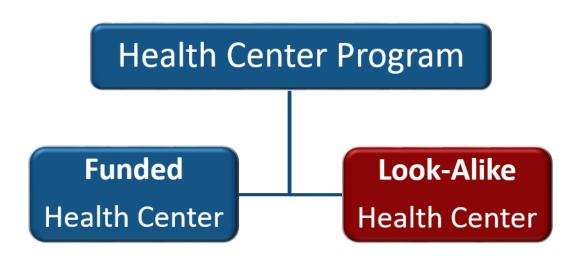
Look-Alike Overview





What is a Look-Alike?

- Health center that receives look-alike designation from HRSA but does not receive Health Center Program funding
- Public or nonprofit private entity
- Cannot be owned, controlled, or operated by another entity
- Adhere to Health Center Program fundaments and requirements
- At the time of application, must be:
 - Operational providing comprehensive primary care services 40 hrs/wk
 - Compliant with all Health Center Program requirements



100% Compliant, 100% of the Time





Health Center Program Benefits

Benefit/Program Access	Funded	Look-Alike
FQHC Prospective Payment System (PPS) reimbursement for services provided to Medicaid and Medicare patients	Υ	Υ
340B Drug Pricing Program	Υ	Υ
Vaccines for Children Program	Υ	Υ
National Health Service Corps providers	Υ	Υ
HRSA-supported training and technical assistance	Υ	Υ
Health Center Program funding	Υ	N
Federal Tort Claims Act (FTCA) medical malpractice insurance	Υ	N
Federal loan guarantees for capital improvements	Υ	N





How to Apply





Before Starting an Application

- You must already be operational:
 - Comprehensive primary care (see list of required services)
 - 40 hours per week at a permanent service delivery site
- Review <u>Apply for Look-Alike Initial Designation (LAL ID)</u>
- You must already comply with program requirements (see <u>Health Center Program Compliance Manual</u>)
- Read the <u>Look-alike Initial Designation Application Instructions</u>
 (PDF) and <u>Health Center Program Site Visit Protocol</u>
- Review how to remain a look-alike
 - Report on your progress every year
 - Renew your designation every three years







Before Submitting your Application

- ✓ Assess unmet need in the service area
- ✓ Collaborate with community partners to address unmet need
- ✓ Ensure that your organization is eligible to apply
- ✓ Ensure the board is compliant and meeting monthly
- ✓ Ensure you have operational policies and procedures for providing comprehensive primary care
- ✓ Register with <u>SAM.gov</u> and with <u>HRSA Electronic Handbooks</u> (EHBs)





Application Process and Timelines





Application review process: approximate timeframes

Responsible Entity	Process	# of Days
Applicant	Develop and submit application in EHBs	90
HRSA	Perform preliminary review to assess eligibility and completeness*	60-75
HRSA and Applicant	Schedule and prepare for site visit	60-120
HRSA	Conduct site visit for compliance and eligibility. Communicate findings to applicant*	45-60
Applicant	Respond to additional information if requested by HRSA	30
HRSA	Final compliance and eligibility determination	7 5



HRSA
Health Center Program

^{*} Denotes **determination points** for disapproval *or* progressing to next stage of review

Initial Designation Application Components





Application components

Project Abstract

Project Narrative

- Need
- Response
- Collaboration
- Impact/Evaluative Measures
- Capacity
- Governance

Attachments

Program Specific Forms





Attachments

- 1. Patient origin and utilization information
- 2. Service area map and table*
- 3. Medicare and Medicaid documentation
- 4. Bylaws*
- 5. Governing board meeting minutes
- 6. Co-Applicant Agreement for Public Entities*
- 7. Contracts and Referral Arrangements
- 8. Articles of incorporation
- 9. Evidence of Nonprofit or Public Center Status*

- 10. Financial Statements
- 11. Organizational Chart
- 12. Position Descriptions of Key Personnel
- 13. Biographical Sketches of Key Personnel
- 14. Sliding Fee Discount Schedule
- 15. Collaboration Documentation*
- 16. Floor Plans
- 17: Budget Narrative
- 18. Other Relevant Documents*



*Not counted toward 90-page limit



Program Specific Forms

Form 1A: General information worksheet

Form 1C: Documents on file

Form 2: Staffing profile

Form 3: Income analysis

Form 3A: Budget information

Form 4: Community characteristics

Form 5A: Services provided

Form 5B: Service sites

Form 5C: Other activities/locations

Form 6A: Current board member

characteristics

Form 6B: Request for waiver of board member

requirements

Form 8: Health center agreements

Form 12: Organization contacts



Forms are not counted toward 90-page limit



Eligibility Requirements





Demonstrating Eligibility (1/4)

Eligibility Requirement	What We Check
1. Must be a nonprofit organization OR public entity.	 Attachment 8: Articles of Incorporation Attachment 9: Evidence of Nonprofit or Public Agency Status
2. Must not be owned, controlled, or operated by another entity.	 Project Narrative Form 8: Health Center Agreements Attachment 3: Medicaid and Medicare Documentation Attachment 4: Bylaws Attachment 5: Governing Board Meeting Minutes Attachment 7: Contracts and Referral Arrangements Attachment 8: Articles of Incorporation Attachment 9: Evidence of Nonprofit or Public Agency Status Attachment 10: Financial Statements





Demonstrating Eligibility (2/4)

Eligibility Requirement	What We Check
3. Must be operational and currently providing all required primary health services.	 Project Narrative Form 1A: General Information Worksheet Attachment 1: Patient Origin and Utilization Information Attachment 3: Medicaid and Medicare Documentation Attachment 5: Governing Board Meeting Minutes Attachment 7: Contracts and Referral Arrangements Attachment 10: Financial Statements
4. Must currently provide comprehensive primary care as your main purpose.	 Project Narrative Form 1A: General Information Worksheet Form 5A: Services Provided
5. Must comply with all requirements in the <u>Health Center Program Compliance Manual</u> .	Project NarrativeAll Forms and Attachments





Demonstrating Eligibility (3/4)

Eligibility Requirement	Demonstrating Eligibility (Appendix A)
6. Must make primary health care services accessible to all individuals in the service area, regardless of ability to pay.	 Project Narrative Attachment 14: Sliding Fee Discount Schedule
7. Must request initial designation for at least one permanent service delivery site that provides comprehensive primary medical care as its main purpose and operates for a minimum of 40 hours per week.	 Project Narrative Form 5B: Service Sites Health Center Program scope of project: Visit <u>Find a</u> <u>Health Center</u> to see the addresses for current Health Center Program service sites
8. Your look-alike service site(s) must be located in a building that does not include any current Health Center Program award recipient or look-alike sites.	• Form 5B: Service Sites





Demonstrating Eligibility (4/4)

Eligibility Requirement	Demonstrating Eligibility (Appendix A)
9. Must serve in whole or part the a Medically Underserved Area or Population (MUA/P). Note: Applicants requesting look-alike designation only for special populations (MHC, HCH, and/or PHPC) are not required to have MUA/MUP designation.	 Form 1A: General Information Worksheet Form 5B: Service Sites Attachment 1: Patient Origin and Utilization Information Attachment 2: Service Area Map and Table
10. Public Housing Primary Care applicants only: You must demonstrate that you have consulted with public housing residents in the preparation of the ID application and ensure ongoing consultation with public housing residents.	 Project Narrative Form 6B: Waiver of Board Member Requirement (as applicable)





Remember: Applicants must meet all eligibility requirements at the time of application



Health Center Program Requirements





Program Requirements

- 1. Needs Assessment
- Required and Additional Health Services*
- 3. Clinical Staffing*
- 4. Accessible Locations and Hours of Operation
- Coverage for Medical EmergenciesDuring and After hours
- Continuity of Care and Hospital Admitting
- 7. Sliding Fee Discount Program*
- 8. Quality Improvement/Assurance

- 9. Key Management Staff
- 10. Contracts and Subawards
- 11. Conflict of Interest
- 12. Collaborative Relationships
- 13. Financial Management and Accounting Systems
- 14. Billing and Collections
- 15. Budget
- 16. Program Monitoring and Data Reporting Systems
- 17. Board Authority*
- 18. Board Composition



*Frequent areas of look-alike applicant noncompliance



Compliance Manual

- Assists health centers in understanding and demonstrating compliance with Health Center Program requirements
- Available at <u>Health Center Program</u>
 <u>Compliance Manual</u>
- Applicants must demonstrate compliance with all program requirements at the time of application.







Required Services

Clinical Services

- General primary medical care
- Diagnostic laboratory and radiology
- Screenings
- Coverage for emergencies after hours
- Voluntary family planning
- Immunizations
- Well-child care
- Gynecology and obstetrical care
- Preventive dental
- Pharmaceutical services

Enabling Services

- Case management
- Eligibility assistance
- Health education
- Outreach
- Transportation services
- Translation services





Changes from the Previous Instructions





Key Changes (1/3)

See the Instructions for all changes

- Clarified what factors HRSA considers to determine if your organization is independently owned, controlled, and operated. (For example, whether most of your clinical and administrative functions are provided through direct employment, contractors, or a single affiliated or related organization.)
- Added a request for information on how you provided your local community with notice of your application to become a look-alike.
- Updated Attachment 18: Other Relevant Documents. You must submit more information in the attachment and HRSA may not approve your application if:
 - You propose a look-alike site within 1 mile of a current Health Center Program award recipient or look-alike site.
 - You propose a service area that has a Health Center Program penetration level of the low-income population that is 50 percent or greater, per the <u>Health Center Program (HCP) GeoCare Navigator</u>. You must include both Health Center Program award recipients and LALs in your GeoCare Navigator service area map.
 - You select "urban" on Form 1A, and your proposed look-alike site is more than 15 miles from your closest proposed look-alike site, if proposing multiple sites.
 - You select "rural" on Form 1A, and your proposed look-alike site is more than 30 miles from your closest proposed look-alike site, if proposing multiple sites.





Key Changes (2/3)

See the Instructions for all changes

- Updated Attachment 18: Other Relevant Documents to add that HRSA will further evaluate applications with proposed service areas that overlap with other health centers or LALs. This review will consider whether letters of support were submitted in Attachment 15: Collaboration Documentation, as well as the potential impact of a new look-alike on both the unmet need in the community and the financial stability of existing Health Center Program award recipients, LALs, other Medicaid providers, and other providers serving the uninsured in the proposed service area.
- Explained how to include indirect costs in your budget.
- Added that HRSA may prioritize application review and technical assistance if at least one of your service delivery sites is in a zip code with an Unmet Need Score (UNS) of 75 or greater according to the <u>Unmet Need Score Map</u>
 Tool or is located in an area currently served by the Health Center Program and at risk for losing access to care.
- Updated <u>Form 1A</u>: <u>General Information Worksheet</u> (PDF) to include your UNS score.
- Removed the Clinical and Financial Performance Measures form.





Key Changes (3/3)

- Updated our review process time frames.
- The page limit is reduced to 90 pages. This does not include required forms or the following attachments:
 - Attachment 2: Service Area Map and Table
 - Attachment 4: Bylaws
 - Attachment 6: Co-Applicant Agreement for Public Agencies
 - Attachment 9: Evidence of Nonprofit or Public Agency Status
 - Attachment 15: Collaboration Documentation
 - Attachment 18: Other Relevant Documents





Tips and Resources





Preparing a Successful Application

- ✓ Read and follow the Instructions on <u>Apply for Look-Alike Initial Designation (LAL ID)</u>.
- ✓ Refer to the EHBs Look-Alike Initial Designation User Guide on <u>Apply for Look-Alike Initial</u> <u>Designation (LAL ID)</u> for assistance completing forms and submitting in EHBs
- ✓ Clearly demonstrate the organization is:
 - Independently owned, controlled, and operated with a board that is engaged, informed, and providing oversight
 - Currently operational providing comprehensive primary care for 40 hrs/wk
- ✓ Conduct a self-assessment using the Compliance Manual and demonstrate how the organization currently meets all Health Center Program requirements
- ✓ Use tools on <u>Scope of Project</u>, including:
 - Form 5A Service Descriptors and Form 5A Column Descriptors
 - Health Center Self-Assessment Worksheet for Form 5A: Services Provided
 - Ensure information is consistent across forms, attachments, and the Project Narrative



Preparing for the Operational Site Visit (OSV)

- ✓ Review the <u>Health Center Program Site Visit Protocol</u> and perform a self-assessment to ensure your organization is compliant
- ✓ Use the <u>Operational Site Visit Documents Provided by HRSA</u> to ensure all documents are available for the onsite review
- ✓ Ensure your records demonstrate your organization is following established policies and procedures
- ✓ Confirm all referral arrangements and contracts are in place and compliant.
- ✓ Prepare your board and staff for the upcoming OSV





Technical Assistance (TA) Resources (1/2)

Topic	Contact
Guidance on Requirements and Application Components	Apply for Look-Alike Initial Designation (LAL ID)
Application Questions	Look-alike Initial Designation TA Team: Submit a request using the <u>BPHC Contact Form</u> Under Look-Alike Designation, select <i>Initial Designation</i> (LAL-ID)



Technical Assistance (TA) Resources (2/2)

Topic	Contact
EHBs Submission Issues	Health Center Program Support: 877-464-4772 Submit a request using the BPHC Contact Form Under Technical Support, select: 1. EHBs Tasks/EHBs Technical Issues 2. LAL Applications Technical Question
Primary Care Associations and National Training and TA Partners	Strategic Partnerships





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