

2001-13

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DOCUMENT TITLE: Clarification of Program
Requirements and Benefits for Bureau of Primary Health
Care Supported School-Based Health Center Programs

TO: All Bureau of Primary Health Care Supported Programs
Federally Qualified Health Center Look-Alikes

The Bureau of Primary Health Care (BPHC) provides funding to health centers that has led to the development and operation of 512 school-based health center programs through the Consolidated Health Centers Programs. In accordance with language included in congressional appropriations reports, 130 of these school-based health centers (SBHCs) are funded through the Healthy School, Healthy Communities Program (HSHC) under the Consolidated Health Centers appropriation.

The BPHC-supported SBHC programs are subject to the same requirements and expectations of other health centers funded under the authority of section 330 of the Public Health Service Act. They are also eligible for the same benefits.

This Policy Information Notice (PIN) clarifies the applicability of legislative requirements and Bureau expectations for HSHC grantees and other BPHC-supported SBHC programs. It also clarifies requirements and benefits to assist these SBHC programs in maximizing reimbursement, reducing costs, and strengthening and expanding their role in the health care safety net.

If you have any questions regarding information included in this PIN, please contact Darryl Burnett, Deputy Chief, Center for School-Based Health at (301) 594-4449 or email dburnett@hrsa.gov.

/s/

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Attachment

**Clarification of Program Requirements and Benefits for
BPHC-Supported School-Based Health Center Programs**

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BPHC-SUPPORTED SCHOOL-BASED HEALTH CENTER PROGRAMS

I. BACKGROUND

Since the late 1960s, community-based health care providers have collaborated with school systems to establish and implement school-based health centers (SBHCs) that provide comprehensive primary and preventive health services. The SBHCs have grown rapidly over the past decade, from 200 in 1990 to 1,380 in 2000 - an increase of almost 600 percent.

A SBHC is defined as a health center located in a school or on school grounds that provides on-site comprehensive preventive and primary health services including mental health, oral health, ancillary and enabling services. These services are culturally sensitive, appropriate, family-oriented and tailored to meet the health care needs of youth, adolescents and the community. The array of services provided on-site is locally determined by school principals, school boards, parents, and providers, and referral arrangements are provided for services not available on-site. No SBHC services are provided without fully informed parental consent. By supporting educational efforts by making sure that children are “ready to learn,” SBHCs are 1) part of an integrated system of care and provide continuity of care to assure after hours and year round coverage and 2) proven to provide access to confidential and comprehensive preventive and primary health services.

In 1993, the Bureau of Primary Health Care (BPHC) had 64 grantees that operated 132 SBHCs in conjunction with other health center activities. In 1994, the Healthy Schools, Healthy Communities Program (HSHC), the only source of direct SBHC funding from the BPHC, was started with 22 grantees and has grown to a program with 76 grantees. Most have 3 year project periods and are part of the operation of Federally Qualified Health Centers (FQHC). The BPHC has 213 grantees including the HSHC grantees that operate the 512 BPHC-supported SBHC programs.

The BPHC wants to clarify the status, benefits, and expectations for these grantees and will do so in this Policy Information Notice (PIN). It is our intent to see strong and stable SBHCs thrive. They have and will continue to be essential community-based providers in the health care safety net. For additional information on SBHCs, go to www.bphc.hrsa/HSHC/ and the Center for Health and Health Care in Schools web site at www.healthinschools.org.

II. FEDERAL STATUS

Requirements for funding are specified under section 330 of the Public Health Service (PHS) Act, as amended by the Health Centers Consolidation Act of 1996. In 1998, the BPHC released “Health Center Program Expectations” in PIN 98-23. This PIN provides additional guidance to organizations funded under section 330. This PIN also states that “the expectations also apply to school-based health centers funded through the Healthy Schools, Healthy Communities Program.”

Healthy Schools, Healthy Communities Programs are recipients of funding under the section 330 health center appropriation. Organizations receiving HSHC grants must meet all of the requirements of section 330 and are also subject to expectations outlined in PIN 98-23. This PIN applies to all SBHCs operated in the scope of project for section 330 health centers.

Because HSHC grantees are awarded grants under section 330 and provide primary health care to medically underserved populations, they are FQHCs. Therefore, they are eligible for benefits extended to all FQHCs (i.e., the Medicaid Prospective Payment System (PPS), Federal Tort Claims Act (FTCA) coverage, the Drug Pricing Program, and the Vaccines for Children Program).

III. EXPECTATIONS

All SBHCs are expected to be familiar with and use the following resources:

- **Health Center Program Expectations** - describes expectations of entities funded by the BPHC under section 330 of the PHS Act, as amended by the Health Centers Consolidation Act of 1996. In addition to requirements for health centers that are specified in law and regulation (requirements emphasized by “must”), these expectations also reflect Bureau priorities and preferences for program funding or aspects (denoted by “should”) associated with success. [reference PIN 98-23]

- **Automated Single Grant Applications** - a package that allows existing grantees to fill out suggested and required forms, attach narrative portions of the application and then transmit electronically through the Internet to the BPHC Grants Management Office. The HSHC programs should start using this process in 2002 and will be required to submit applications through this process beginning with the application for fiscal year (FY) 2002 funding. [reference www.bphc.hrsa.gov/asga/ PIN 2001-12 and Program Assistance Letter (PAL) 2001-22]

- **Uniform Data System** - the integrated reporting system used by all Consolidated Health Center grantees of the BPHC. Proposed reporting requirements for HSHC programs are scheduled as “optional” in calendar year (CY) 2001 and “mandatory” in CY 2002. [reference PAL 2000-16]

- **Healthy Schools Healthy Communities Primary Care Effectiveness Review** - a comprehensive review tool to support continuous quality improvement of SBHCs funded through the HSHC program. The primary purpose of the HSHC Primary Care Effectiveness Review (PCER) is to assess SBHCs compliance with law, regulation and program expectations and identify areas requiring improvement. The HSHC programs are required to have a HSHC PCER at least once during their competing funding cycle (project period) if they are not included in the PCER or Joint Commission on Accreditation of Healthcare Organization (JCAHO) review of their BPHC-funded parent organization.

- **Accreditation Initiative** - in conjunction with the JCAHO, this initiative promotes accreditation of health centers while reducing duplication with the Bureau's own PCER. This process merges the PCER and the JCAHO survey into one integrated procedure. The HSHC programs should consider this option. [reference PIN 2000-14]

- **Medically Underserved Area/Health Professional Shortage Areas** - are federally designated areas of the country. The Federal Government has developed criteria for these areas, medically underserved area/health professional shortage areas to identify areas that need additional clinicians (physicians, dentists, nurses, mental health workers). All SBHC sites need to be in health professional shortage areas to be eligible to receive National Health Service Corps (NHSC) recruitment and placement assistance [reference the Health Resources and Services Administration (HRSA) Field Office or use BPHC ACCESS at <http://www.bphc.hrsa.dhhs.gov> to obtain "NHSC Site Development and Professional Placement Policies and Strategy" PIN 2000-12]

- **Scope of Project Policy** - is intended to clarify scope of project issues, improve consistency, and provide guidance concerning change in scope requests. A health center's scope of project should be consistent with program expectations (PIN 98-23) as well as the missions of the health center and BPHC. For organizations that operate BPHC-supported SBHCs and have other lines of business not funded by BPHC, only those activities that are included in the grant scope of project are subject to the requirements of health centers or eligible for FQHC benefits. [reference PIN 2000-04]

- **Functional Requirements for Clinical Practice Management Information Systems** - is a comprehensive tool for health centers 1) to provide reliable information to health center staff on Clinical Practice Management Information Systems (CPMIS) software vendors and their experience level with underserved communities; 2) to assist health centers in defining their own CPMIS requirements, developing Requests for Proposals and subsequently evaluating vendor proposals; etc. [reference PIN 2000-12]

- **Cultural & Linguistic Competence in Primary Health Care** - is a series of policy briefs that are developed by the National Center for Cultural Competence under contract with the BPHC component. The goal of the policy brief series is to facilitate policy making that supports

culturally and linguistically competent primary care services. [reference PIN 2000-10; PIN 2001-05]

- **School-Based Outreach for State Children's Health Insurance** - encourages participation in a nationwide effort to enroll uninsured children in the State Children's Health Insurance Program and to ensure their access to health care. [reference State Primary Care Association and Primary Care Offices: PAL 2000-08]

- **Section 330 Management and Finance Requirements** - describes the management team, systems and infrastructure. The financial system for health centers need to provide for internal controls, safeguard assets, ensure stewardship of Federal funds, maintain adequate cash flow to support operations, assure access to care, and maximize revenue from non-Federal sources including billing Medicaid and the Children's Health Insurance Program. [reference PIN 98-23]

- **Department of Health & Human Services Fiscal Year 2001 Appropriations, Other Legislation, & Regulation Issuances** - provides information regarding FY 2001 appropriations for programs funded by BPHC, as well as other legislation that is relevant to BPHC programs, including the new PPS for FQHCs and Rural Health Clinics: the Children's Health Act of 2000; and new regulations on Medical Records Privacy issued under the Health Insurance Portability and Accountability Act of 1996. [reference PAL 2001-09]

- **Section 330 Governance Requirements*** - are addressed in law, regulation and policies. Requirements in the law apply to all health centers. The governing body has the full authority and oversight responsibility of the health center. [reference PIN 98-12; PIN 98-23]

* HSHC grantees are required to follow section 330 Governance Requirements and may fulfill these requirements two ways: 1) by having a SBHC board that meets all the section 330 requirements, or 2) by having a school health consumer or representative included on the governing board of the "parent" FQHC.

IV. HEALTH CENTER ENTITLEMENTS

Healthy Schools, Healthy Communities grantees and other BPHC-supported SBHCs are also eligible as health centers for the following entitlements by virtue of being funded under section 330: [note the references for additional information]

- **Federal Tort Claims Act** (a.k.a., Federally Supported Health Centers Assistance Act of 1992) a law that provides malpractice liability insurance relief to FQHCs [reference PIN 99-08 - questions concerning FTCA should be directed to the FTCA Coordinator in the Field Office listed in PIN 99-08, reference PIN 2000-11]

- **Public Health Service Drug Pricing Program** (section 340B of the PHS Act) - allows FQHCs to purchase covered outpatient drugs for their patients at discounted prices [reference PAL 2000-07; for further information regarding this program, please call the Office of Pharmacy Affairs at 1-800-628-6297 or 301-594-4353]

- **Vaccines for Children/Improving Vaccination Coverage in Children** - the “Vaccines for Children (VFC) Program” is a federally-funded vaccine supply program authorized under the Omnibus Budget Reconciliation Act of 1993. Four groups of children (age 0-18) are eligible to receive VFC-purchased vaccines: Medicaid-enrolled children; uninsured children; American Indian and Alaskan Native children; and underinsured children (those who have insurance that does not cover immunizations) when the vaccine is administered by an FQHC or Rural Health Clinic- (VFC web-site - www.cdc.gov/nip/vfc/ or call the VFC toll-free number: 1-800-232-2522). Reference the following PAL for BPHC-support. [reference PAL 99-27]

As a part of the health care safety net, SBHC programs are supported 1) by the HRSA BPHC infrastructure that includes the HRSA Field Offices, Primary Care Associations and Primary Care Offices, 2) by the National Clearinghouse for Primary Care Information (1-800-400-2742), and 3) special Bureau initiatives (e.g., National Health Center Practice Improvement Initiative*) to add stability and growth to direct-funded SBHC programs.

* A collaborative project of the National Association of Community Health Centers, Medical Group Management Association’s Center for Research, and the BPHC. This partnership initiative trains health centers in use of the Physician Services Practice Analysis software package to generate relative value units for services and procedures. [reference PAL 99-17]

V. PLANS EFFECTIVE JULY 1, 2001

The Center for School-Based Health is implementing the following activities to support the stability and growth of SBHCs.

- **Assigning HSHC Project Officers in the Field** - experienced staff in HRSA's five field offices are preparing to assist HSHC programs in complying with Federal regulations and maximizing the efficacy of SBHCs. These project officers will be named in the notice of grant award for each HSHC grantee with budget start dates of July 1, 2001.

- **Collaborations with the Maternal and Child Health Bureau** - are implemented to maximize the Federal support for SBHCs. Several noted activities include:

- developing and coordinating "HRSA's Project for Promoting School-Based Health Centers' Ability to Maximize Financial Reimbursement for Clinical and Health Education Services,"
- supporting "Design of the User/Visit Sample Survey for the HSHC Program,"
- coordinating the HRSA Technical Advisory Group for School-Based Health and Managed Care and,
- functioning in mutual support of the National Coordinating Committee on School Health.

- **National Conference on School-Based Health Care** - is a joint annual meeting of the National Assembly on School-Based Health Care and BPHC's Center for School-Based Health to provide technical assistance and knowledge/skill development support for staff of school-based health center programs. More information about the National Assembly is available at www.nasbhc.org.

- **Continuous Quality Improvement Tool for SBHCs** - is a tool for sentinel conditions to be core measures of quality in SBHCs. More information about the Continuous Quality Improvement tool and the Center for Health and Health Care in Schools are available at www.healthinschools.org.

- **HSHC web site [www.bphc.hrsa/HSHC/]** - is a tool for school-based health center programs to locate information on Federal activities related to school health as well as other non-Federal resources/opportunities.

VI. SOURCE

BPHC Policy Information Notice 2001-13

This PIN was developed by the Center for School-Based Health within the Division of Programs for Special Populations in collaboration with the Office of Program and Policy Development, the Division of Community and Migrant Health, and other BPHC Divisions and Offices.

The BPHC also has a web-site at www.bphc.hrsa.gov to access PINs and PALs referenced in this document. Note that future policy and programming issues pertaining to BPHC-supported SBHC programs will be issues via PINs and PALs. For additional information, please contact Darryl Burnett, Deputy Chief of the Center for School-Based Health at (301) 594-4449 or email at dburnett@hrsa.gov.