Health Center Changes and Uniform Data System (UDS) Reporting: Frequently Asked Questions (FAQ)

All health centers funded or designated in whole or in part before October 1 of the reporting year, including New Access Points (NAPs), must report on in-scope activities for the full calendar year (January 1 – December 31). Health centers are required to report on in-scope activities even if no grants were drawn down for programs during the year.

This FAQ outlines some common questions and answers pertaining to several scenarios that may affect UDS reporting requirements:

- New Health Center Award or Designation
- New Services or Sites
- Health Center Organizational Changes

Key Definitions

- **Health Center Program Awardees:** Health centers that receives federal award funds under the Health Center Program authorized by section 330 of the Public Health Service (PHS) Act (42 U.S.C. 254b)
- **Health Center Program Look-Alikes:** Health centers that do not receive regular federal funding under section 330 of the PHS Act, but meet the Health Center Program requirements for designation under the program (42 U.S.C. 1395x(aa)(4)(A)(ii) and 42 U.S.C. 1396d(l)(2)(B)(ii))
- **New Start:** A new health center awardee or designee that was not previously a part of the Health Center Program
- **New Services:** Services that are newly added to a health center's scope of activity and reflected on the Notice of Award/Designation
- **New Access Point (NAP):** A new, full-time, permanent service delivery site for the provision of comprehensive primary health care services to underserved populations

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New Health Center Award/Designation

Q: My health center was recently awarded 330 funding or designated as a look-alike for the first time. Do we need to report data for the full calendar year, even though we received this award/designation after the start of the year?

A: If your health center received funding or designation before October 1st of the calendar year, you will need to report on in-scope activities for the full calendar year (January 1 – December 31) that you received your award or designation.

If your health center was awarded funding or designated for the first time on or after October 1, you will not be required to submit a UDS Report and will not have access to the reporting in the EHBs for that calendar year.

Q: We were previously designated as a look-alike but recently awarded 330 funding and are now considered a health center awardee. Do our reporting requirements change?

A: The UDS reporting requirements as outlined in the UDS manual are the same for look-alikes and health center awardees. What type of UDS Report you complete (Awardee or Look-Alike) will depend on the timing of when your conversion to a health center awardee took place. If your conversion took place prior to October 1st, you will submit an Awardee UDS Report for the full calendar year (January 1 – December 31). If your conversion took place on or after October 1st, you will continue to submit a Look-Alike UDS Report for the full calendar year and will submit an Awardee UDS Report the following year. The electronic handbooks (EHBs) will automatically update to show you the correct UDS Report you will need to complete.

New Services and Sites

Q: We added new services to our scope in the calendar year. How should we report these new services?

A: If you received approval to deliver new services, such as a grant to add a dental program to your scope, you will need to report data for the new services for the full calendar year (January 1 – December 31).

Q: We added a new site to the scope of project, but this site was formerly a private practice and we are not able to retrieve data for the full calendar year. What should we do?

A: All health centers must submit data for all in-scope activities as reflected in the official Notice of Award/Designation when a new site is added. If your health center added a new site either through a Change in Scope request or through a New Access Point award, you will be required to submit data for in-scope activities based on your Change in Scope approval date and/or New Access Point site implementation date.

Health Center Organizational Changes

Q: My health center merged with another health center this year. Do we both need to complete UDS Reports?

A: If your health center merges with another health center, during the calendar year, and this resulted in a HRSA approved Successor in-Interest, the new health center awardee would be responsible for completing a combined UDS Report. The report must accurately capture all of the acquired health center's data for in-scope activities for the full calendar year (January 1 – December 31). The acquired health center would not submit a UDS Report.

Q: What do we do if the health center we acquired used a different Electronic Health Record (EHR) system and we are not able to migrate their data into our EHR?

A: The new health center will still be required to report on the full calendar year (January 1 – December 31). To complete the UDS Report as accurately as possible, your health centers will need to be able to access and report on data housed in the acquired health center's EHR system. Your health center should work to establish a process to pull and transfer data from the acquired health center's EHR system during the merger process.

When combining data between two or more EHR systems to complete a UDS Report that represents all entities' data, you must take steps to ensure that you are reporting unduplicated patient counts and activity and other required data (e.g., ensure that patients are only counted in the denominator once for each of the clinical measures).

If it is not possible to pull and transfer data from the acquired health center's EHR system, please complete the UDS Report to the best of your ability with the data you do have and be sure to utilize the Table Comment feature in the EHBs to document and help explain or contextualize the presence of missing data and its impact on any affected tables.

UDS+ Reporting

Q: Can health centers that were recently awarded or designated, added new services or sites, or changed their organizational structure (i.e., merger) participate in de-identified patient-level data (UDS+) submission for calendar year 2023?

A: For 2023 UDS reporting, all health centers are required to submit the full UDS Report within the electronic handbooks (EHBs) by February 15, 2024. Health centers may voluntarily choose to also submit de-identified patient-level (UDS+) data using Health Level Seven (HL7®) Fast Healthcare Interoperability Resources (FHIR®) R4 standards. Health centers will not be penalized for partial or inaccurate 2023 UDS+ data submitted using HL7 FHIR R4 standards, and the EHBs submission will be the final record of data for 2023 UDS reporting. UDS+ is limited to the following tables:

- Patients by ZIP Code Table
- Table 3A: Patients by Age and by Sex Assigned at Birth
- Table 3B: Demographic Characteristics
- Table 4: Selected Patient Characteristics
- Table 6A: Selected Diagnoses and Services Rendered

- Table 6B: Quality of Care Measures
- Table 7: Health Outcomes and Disparities

Health centers choosing to participate in this voluntary reporting will submit through (bulk) FHIR R4 APIs, using the UDS+ FHIR R4 Implementation Guide (IG), as described in Appendix G of the [2023 UDS Manual](#).