



# HRSA Post OSV Action Response

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# Programmatic Areas Reviewed

1. Program Eligibility
2. Oversight
3. Needs Assessment
4. Required and Additional Services
5. Clinical Staffing
6. Accessible Locations and Hours of Operation
7. Coverage for Medical Emergencies During and After Hours
8. Continuity of Care and Hospital Admitting
9. Sliding Fee Discount Program
10. Quality Improvement
11. Key Management Staff
12. Contracts and Subawards
13. Conflict of Interest
14. Collaborative Relationships
15. Financial Management and Accounting Systems
16. Billing and Collections
17. Budget
18. Program Monitoring and Data Reporting Systems
19. Board Authority
20. Board Composition
21. Federal Tort Claims Act Deeming Requirements

# Required Additional Services

## HRSA finding...

- **Case Management**  
Referral services currently not provided for case management at this time.

## Our response...

- A scope change was approved by Governing Council on 8/10/2021.

# Clinical Staffing

## HRSA finding...

- **Procedures for Review of Privileges**

It was noted our written policies did not address verification of fitness for duty upon hire and on a recurring basis.

## Our response...

- **This requirement has been added to our policies, which will be reviewed by the Governing Council through standard process.**

# Sliding Fee Discount Program

## HRSA finding...

- **Multiple Sliding Fee Discount Schedules**

All health center sliding fee discount schedules are based on services and/or service delivery methods and no other factors.

It was noted the school-based health center was based on the location of service rather than on the type of service or delivery.

## Our response...

- **School-based Health Center sliding fee discount schedules now match what is provided at all other LCHDCHC FQHC locations.**
- **This was approved by the Governing Council on 8/10/2021.**

# Conflict of Interest

## HRSA finding...

- **Standards of Conduct**  
It was noted that our policy was not an “absolute” prohibition for individuals with a real or apparent conflict of interest with a given contract from participating in the selection, award, or administration of such contract.

## Our response...

- **Amendment to the Purchasing Policies and Procedures will be presented to the Governing Council on 9/14/2021 and presented to and approved by the Board of Health on 9/22/2021.**

# Board Authority - Budget

## HRSA finding...

- **Exercising Required Authorities and Responsibilities**

The annual budget needs to be reviewed for proposed uses of both the federal health center program award and non-federal resources and revenue.

## Our response...

- **The budget with the delineation of projected costs and revenue by federal and non-federal sources was submitted to the Governing Council on 8/10/2021 and approved.**

# Board Authority - Policies

## HRSA finding...

- **Adopting, Evaluating, and Updating Health Center Policies**

It was noted that there was no documentation of the **full** Governing Council's (it was reviewed and approved by GC Executive Committee) adoption, evaluation, or approval of the Billing and Collections policy during the last 36 months.

## Our response...

- **The Billing and Collections policy was presented 8/10/2021 for review and approval by the full Governing Council.**
- **Review and approval will be added as a standing Governing Council agenda item every 36 months or as needed.**

# Next Steps

- **Responses and additional supportive documents have been submitted to HRSA electronically.**
- **Final approval may take up to 60 days.**



# LakeCounty

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