



## CONCEPTUAL PROPOSAL:

### Change of Scope Definition for Federally Qualified Health Centers

*The Department of Health (DOH) is exploring a potential update to the state's definition of a change in scope of services for Federally Qualified Health Centers (FQHCs). In discussions with the Alaska Primary Care Association (APCA), the Department determined that establishing a non-exhaustive list of examples of changes in scope of services would be helpful in providing guidance to FQHCs interested in requesting a change in scope.*

*This document presents a **conceptual proposal** outlining a revised definition and proposed examples of changes in scope of services. It is intended **solely for discussion purposes** and does not represent a final policy or determination. Any formal changes, including a State Plan Amendment (SPA) as necessary, will follow the applicable standard rulemaking process, including opportunities for public comment and stakeholder engagement.*

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For FQHCs, a change in the scope of services may be defined as a change in the type, intensity, duration and/or amount of services. A change in the cost of a service is not considered in and of itself a change of the scope of services.

The following examples are offered as guidance to help FQHCs understand the types of changes that may be recognized as part of the definition of a change of scope of services, however, any change would be subject to approval by the Department. Examples include, but are not limited to, the following:

- a) The addition or deletion of a new FQHC or RHC service (such as adding or deleting dental services, another health professional service, or other Medicaid covered services that do not require a face-to-face visit with an FQHC or RHC provider, for example, laboratory, x-rays, care management, or outreach) that is not included in the existing prospective payment system reimbursement rate.
- b) A change in the type, intensity, duration and/or amount of service due to amended regulatory requirements or rules. Examples include but are not limited to:
  - The State amends the State Plan to remove a Medicaid covered service that is included in some FQHCs' existing prospective payment system reimbursement rate.
  - Changes in laws or regulations related to patient privacy.
- c) A change in types of services due to a change in applicable technology and medical practice utilized by the center or clinic. Examples include but are not limited to the implementation of new electronic health record or practice management systems; the implementation of integrated primary care-behavioral health or patient-centered medical home models; and the integration of specialist services into primary care or behavioral health visits.
- d) An increase in the intensity of a service attributable to significant changes in the types of patients served, including, but not limited to, a significant increase in the populations with HIV or AIDS, other chronic diseases, homeless, elderly populations, seasonal workforce, or other special populations.
- e) A change in the scope of a project approved by the Health Resources and Services Administration (HRSA) where the change impacts a covered Medicaid service included within the FQHC PPS.

*Examples of items that are NOT considered changes in scope of services include:*

- A change of scope of services does not mean the addition or reduction of staff to or from an existing service.
- A change in the cost of a service is not considered in and of itself a change of the scope of services. This includes, but is not limited to, increases or decreases not directly related to a change of scope of services for:
  - Salaries, benefits, and supplies.
  - Facility overhead or administrative expenses.
  - Assets.
- A change in office hours.
- A change in office location or office space.
- A change in the number of patients served or the number of encounters provided.
- A change in reimbursement methodology (i.e. a provider changing billing services from fee for service to under the FQHC benefit or from the FQHC benefit to under fee for service).