



June 24, 2021

TO: Honorable Members of the Board of Supervisors  
Jeffrey V. Smith, County Executive

FROM: Paul E. Lorenz, Chief Executive Officer, SCVMC  
Selene Ho, Health Center Manager, VHHP

SUBJECT: Health Resource and Services Administration (HRSA) Operational Site Visit for the Valley Homeless Healthcare Program

DS  
PL  
SK

Health Resource and Services Administration (HRSA) has concluded its Operational Site Visit (OSV) for the Valley Homeless Healthcare Program (VHHP) which was conducted from June 22, 2021 through June 24, 2021. The purpose of the OSV is to provide an objective assessment and verification of the status of the Health Center Program and to determine whether the Program has demonstrated compliance with the statutory and regulatory requirements related to three core areas: governance/administration, clinical, and fiscal review.

The HRSA auditors concluded that this was a “successful audit” and were “very impressed” with VHHP and the breadth of services it provides. Moreover, the clinical consultant noted that it was “very rare for an organization to come away with no deficiencies” for the clinical review area.

Overall, the HRSA auditors identified only 4 out of 93 Compliance Elements that are recommended for non-compliance. The four non-compliance elements with the corrective action are as follows:

- Sliding Fee Discount Program - Add language to existing Sliding Fee Discount Program Policy regarding the tiers of Federal Poverty Levels (FPLs) and the copay amount within each FPL tier
- Sliding Fee Discount Program - Evaluate the Sliding Fee Discount Program through an assessment of patient utilization data
- Financial Management and Accounting Systems – Add specific language on drawdown of grant funding to existing written procedures
- Billing and Collections – Evaluate the fee schedule using data on actual health care cost to the organization in addition to data on prevailing wages



### Next Steps

HRSA has a process called the Compliance Resolution Opportunity (CRO) to support the timely resolution of areas of non-compliance cited during a site visit. The CRO provides the health center with an opportunity to address non-compliance findings PRIOR to the health center's receipt of the final site visit report.

With the conclusion of the OSV, HRSA will process the draft site visit report. VHHP will have 14 calendar days from the time of receiving HRSA's first request for additional information to address areas of program non-compliance identified in the draft site visit report. VHHP will submit the required information and supporting documents to address the non-compliance elements. If HRSA determines that the health center has demonstrated compliance with the submission, then the final site visit report will conclude the elements as compliant, and no corresponding condition will be placed on the grant award. Given that the non-compliant elements are relatively minor corrections, VHHP is confident that it will be able to submit the required documentation to demonstrate compliance within the 14 calendar days window.

I would like to thank the Board of Supervisors for participating in the Operational Site Visit and continued support of the Valley Homeless Healthcare Program. Please do not hesitate to contact me should you have questions (408-885-4010).

Cc: Chief Board Aides  
Miguel Marquez, Chief Operating Officer  
James Williams, County Counsel  
Rene Santiago, Director, County of Santa Clara Health System  
Megan Doyle, Clerk of the Board