



PENNSYLVANIA ASSOCIATION OF COMMUNITY HEALTH CENTERS

FQHC/RHC/Free Clinic Requirement Comparisons

Requirement	Federally Qualified Health Center (FQHC)	Rural Health Clinic (RHC)	Free Clinic
Status	Must be 501 (c) (3) not-for-profit or public	Either for-profit or Not-for-profit	Must be a 501 (c) (3) not-for-profit or have a 501(c) (3) affiliation
Board of directors	Community majority	Not required to have a Board	Per by-laws established by each free clinic
Patients served	Care for all ages	May be limited to specific type of primary care practice	Care for all ages provided that patient is uninsured/underinsured
Geography	Must be in or serve HPSA, MUA; can be rural or urban	In MUA or HPSA and non-urbanized area	No requirement
Range of services	Primary health center, maternity and prenatal, preventive care for infants, children and adults; mental/behavioral health, dental and pharmaceutical services	No minimum service requirements	No minimum service requirements
Quality Assessment and Quality Improvement (QI/QA) program	Required	Not required	Required
Minimum operational hours	32 hours per week	Not required	Not required

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Payment methodology	Prospective Payment System (PPS)	PPS	Primarily private sector (donations, contributions or grants)
Independent financial audit	Required	Not required	Not required
Medical liability	Federal Tort Claims Act (FTCA) (except FQHC Look-Alikes)	Private liability insurance	Federal Tort Claims Act (FTCA)
Case management	On site or through arrangement	Not required	Not required
Data submission	National Uniform Data System (UDS) annually	Not required	Not required
Recertification	U.S. Health Resources & Services Administration (HRSA)	Centers for Medicare & Medicaid Services (CMS) certification through PA Department of Health survey process	U.S. Health Resources & Services Administration (HRSA)
Staffing	PA DPW holds to productivity standards	Federally required to use a non-physician provider a minimum of ½ of operating hours	Volunteer basis
Ability to pay	Required to be open to all residents in service area and offer sliding fee	No requirement to see low-income or offer sliding fees	Limited acceptance of 3 rd party payment