FTCA Coverage for Health Center Providers
Responding to Emergency Situations
Sept. 5, 2017

At present, the only health centers who can receive FTCA coverage for services provided in or near disaster areas, or for persons displaced by a disaster, are:

- Health centers whose service area was directly impacted by the disaster.
- Health centers whose service area is located in an area (county, parish, or other political subdivision) that is adjacent to an area that was directly impacted.

Also, health centers whose target population was directly impacted by the disaster may receive FTCA coverage for caring for these patients (and others impacted by the disaster) at locations that are neither in nor adjacent to their service area. For example, a health center from Houston may receive FTCA coverage for providing services in a shelter in Austin for persons displaced by Hurricane Harvey if members of its target population are housed in that shelter.

The requirements for each arrangement are slightly different, and it is necessary to inform BPHC of any temporary sites within 15 days of starting services; for more information, please refer to the attached flowchart, which refers to the relevant section of the FTCA Manual and PAL 2014-05.

Finally, note that coverage for providers who are volunteering with a health center is not effective until October 1, 2017, and until a deeming application for the individual provider has been approved by BPHC. This is true even for health centers located in, or adjacent to, disaster areas.

For more information contact regulatoryaffairs@nachc.org
FTCA Coverage of Health Center Providers in Temporary Sites Responding to Emergency Situations

Based on FTCA Policy Manual and PAL 2014-05
See the Manual and PAL for more information

As of 9/5/17

Are the individuals who would serve at the temporary site employees or qualified contractors of your health center?

NO

YES

Are the patients to be served at the temporary site primarily members of your health center’s target population (e.g., who have been displaced there) and other medically underserved populations who have been displaced by the disaster?

NO

YES

Is the temporary site in an area (county, parish, or other political sub-division) that is adjacent to your existing service area?

NO

Is the temporary site within your health center’s existing service area?

YES

NO

Volunteers are not eligible for FTCA coverage until Oct 1, 2017, and health centers must apply to HRSA to have each volunteer deemed individually. See PAL 2017-06 for more info.

FTCA coverage should apply. Health center must inform BPHC about temporary site within 15 days of starting to provide services, and must submit a formal CIS request if the site will still be operating after 90 days. See F.2.1 in the FTCA Policy Manual and page 5 of PAL 2014-05 for other requirements (e.g., services provided must be within the health center’s approved scope, providers must be acting on behalf of the health center.)

Is the temporary site within your general geographic region (as defined by BPHC)?

NO

YES

There is currently no process for obtaining FTCA coverage for health center providers at these temporary sites.

1 See FTCA Manual for definition of a qualifying “emergency.”
2 Note that PIN 2007-16 has been superseded by the FTCA Manual and PAL 2014-02.
3 “Temporary sites” could include, but are not limited to, an existing site operated by another health center, a local hospital, or a place that provides shelter to evacuees or victims of the emergency. See the FTCA Manual and PAL for more information.
4 It is possible that the volunteer would qualify for immunity or limited liability under State or Federal charitable immunity/limited liability statutes (such as the Federal Volunteer Protection Act of 1997) or under Federal provisions related to the National Disaster Medical System (section 2811 of the PHS Act).