

Letter of Support Policy

The mission of the Kentucky Primary Care Association (KPCA) is to improve Kentucky's capacity to care through advocacy, training and technical assistance, collective impact, and connection. KPCA promotes the development of primary health care services that are comprehensive, accessible, community based, and integrated, regardless of an individual's ability to pay. KPCA supports its members and community partners as they strategically expand services and develop new sites to improve access to quality health care in communities of need across the Commonwealth. KPCA works collaboratively with Kentucky health centers to strengthen and grow the existing safety net delivery system and to support sustainable, community driven growth. This policy establishes principles and procedures governing KPCA's issuance of Letters of Support related to federal Health Center Program funding under Section 330 of the Public Health Service Act, including but not limited to New Access Point applications, Look Alike applications, and Service Area Competition applications. KPCA will continue to collaborate with national and federal partners to remain informed about health center growth opportunities and requirements.

1. Principles of Growth and Expansion

- a) Transparency and collaboration: It is in the interest of KPCA, its members, and the patients they serve to encourage transparency regarding proposed service expansion for the purpose of identifying opportunities for collaboration and minimizing confusion, misunderstanding, or conflict, subject to applicable confidentiality policies.
- b) Respect for autonomy and competition: KPCA respects the autonomy of its members and communities to make independent business and governance decisions regarding growth and expansion. KPCA does not restrain competition, allocate markets, or engage in conduct that would violate federal or state antitrust laws, while encouraging collaboration to the fullest extent permitted by law.
- c) Protection of existing safety net capacity: KPCA is willing and eager to support grant applications that expand access to care and services. However, KPCA will not support proposals that appear to be in direct competition with, or likely to destabilize, existing federally qualified health centers where community needs are already being met and where substantial federal investment has been made.

2. KPCA's Role in Facilitating Collaboration

- a) Neutrality: The KPCA Board of Directors affirms that KPCA staff must remain neutral in discussions among health centers regarding growth or expansion that may involve service area overlap or potential competition.
- b) Decision making authority: KPCA recognizes that decisions regarding expansion are made by individual health center Boards of Directors and that all final funding decisions rest solely with the Health Resources and Services Administration.
- c) Limitations on KPCA involvement: KPCA will not engage in activities that could constitute illegal resource determination, including attempting to influence federal funding decisions, allocating markets, or favoring one applicant over another.

3. Technical Assistance and Convening

- a) Provision of technical assistance: KPCA provides training and technical assistance to existing federally qualified health centers considering expansion and to entities seeking to establish new health centers. The provision of such assistance does not constitute an endorsement of any specific application.
- b) Facilitation upon request: When KPCA becomes aware of potential overlap or competition among applicants, KPCA may, at the request of the parties involved, facilitate introductions or discussions.
- c) Permissible support activities: In furtherance of its mission, KPCA may offer to participate in or facilitate collaborative discussions at the request of involved parties, assist with data collection and analysis, and identify relevant resources, expertise, or guidance.

4. KPCA Letters of Support – General Principles

- a) HRSA requirements: Letters of Support from state primary care associations are not required by HRSA and are not a factor in HRSA funding decisions.
- b) Purpose of letters: KPCA may issue Letters of Support to health centers and partners to strengthen Kentucky's health care system and promote access to primary care services, consistent with this policy.
- c) No endorsement implied: A KPCA Letter of Support does not constitute an endorsement of a specific funding outcome or a determination regarding service area need.

5. Information Required for Letter Requests

Organizations requesting a Letter of Support must provide, at a minimum, the application type, the proposed location of the new site or health center, a brief description of the application's focus, whether the proposed service area is currently served by an existing federally qualified health center defined as the area in which the majority of patients reside, and, if applicable, documentation indicating whether an existing federally qualified health center serving the same area has agreed to support the application.

6. Criteria for Issuance of Letters of Support

KPCA may issue a Letter of Support when the applicant is an active KPCA member in good standing, the proposed site is not currently served by an existing federally qualified health center or KPCA has received documentation demonstrating the incumbent organization's support, and all required request information has been submitted.

7. Competing Applications

- a) Consultation and review: When more than one applicant seeks funding for the same or overlapping service areas, the KPCA Chief Executive Officer may consult with the KPCA Executive Committee and legal counsel to determine an appropriate course of action.
- b) Right to decline: KPCA reserves the right to decline requests for Letters of Support from organizations engaged in competitive application cycles involving overlapping service areas.

8. Adoption and Distribution

These Principles of Growth and Expansion and Letter of Support Policy are adopted by the KPCA Board of Directors. KPCA will provide a copy of this policy with each applicable Letter of Support request.