FQHC & FQHC Look-Alikes – Modernizing Healthcare Technology and Interoperability

Frequently Asked Questions

Updated: 7/22/2026

These FAQs apply only to the FQHC & FQHC Look-Alikes – Modernizing Healthcare Technology and Interoperability program payment.

1. **What are the eligibility requirements for qualified entities?**

Entities must complete all eligibility certification sections in full either by submitting the online form or by filling out the form and submitting it via email. Prior to submission, entities should verify that they have accurately completed all the sections of the eligibility certification and have emailed all documents requested in those sections.

If any portion of the eligibility certification is incomplete, the entity will not be eligible for payment. If any attachment is not included or is incomplete, the entity will not be eligible for payment.

For this program payment, a "qualified entity" is a Medicaid-enrolled provider that is an FQHC or FQHC look-alike that meet Federal qualifications under Section 330 of the Public Health Service Act (42 U.S.C. § 254b).

The entity must certify that:

- The entity meets Federal qualifications under Section 330 of the Public Health Service Act (42 U.S.C. § 254b).
- The entity is an enrolled provider in Pennsylvania's Medical Assistance Program.
- The entity currently operates in the Commonwealth of Pennsylvania. Current operation means that the entity provides health care services, has at least one physical location in Pennsylvania, and has been in operation since at least December 29, 2025.
- The entity will be in full operation in the Commonwealth of Pennsylvania on the date funding is received and is not at risk of closure.
- The entity operates in one or more of the Pennsylvania RHTP regions.
- The entity is located in RHTP-eligible rural counties classes 2A-8.
- The entity provides services to residents of RHTP-eligible rural counties classes 4-8 or in a HRSA rural health area in RHTP-eligible rural counties classes 2A and 3.
- The entity shall use the funding for the qualified activities.

- The entity has reviewed the ongoing financial commitments for the quoted CEHRT system and attests they have the financial means to maintain needed software maintenance and user fees.
- The entity is compliant with applicable federal and state requirements.
- The requested funds are allowable under the CMS Rural Health Transformation Program Notice of Funding Opportunity.
- All public statements, press releases, and publications the entity makes to announce funding or advertise the EHR update and HIO onboarding must include the following statement in accordance with federal requirements: *This project is supported by the Centers for Medicare & Medicaid Services (CMS) of the U.S. Department of Health and Human Services (HHS) as part of a financial assistance award totaling $XX with XX percentage funded by CMS/HHS and $XX amount and XX percentage funded by non-government source(s). The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by CMS/HHS, or the U.S. Government.*
- The entity shall use funding in accordance with federal and state law and the Department's federally-approved RHTP application.
- The entity shall not use funds for purposes outside authorized RHTP activities detailed in the form.
- The entity has disclosed all public funding related to the supported activity.
- This program payment will not supplant any other allocation, stabilization award, federal or state funding, or insurance reimbursement.
- The Department may monitor, inspect, and audit records related to this payment. The entity shall cooperate with the Department's monitoring, inspection, and audit requests.
- The entity shall submit documentation supporting use of the full amount of the program payment to the Department within 30 days after incurring a cost attributed to this funding. Acceptable documentation includes an itemized receipt or invoice.
- The entity shall maintain documentation sufficient for audit through February 27, 2031, and provide that documentation, unredacted, to the Commonwealth, federal government, and their representatives upon request.
- The entity's failure to comply with program requirements, including, but not limited to, those related to monitoring, inspection, and audit, may result in withholding, reduction, or recovery of payments.
- If some or all funding is unspent on June 30, 2027, the entity shall return any unused funds to the Department by July 31, 2027.

The entity also must provide all applicable attachments listed in Section X of the eligibility certification form. These attachments are linked on the funding opportunities page under the heading “FQHC & FQHC Look-Alikes – Modernizing Healthcare Technology and Interoperability”.

2. **Is eligibility limited to entities located in counties included in Attachment E of the Rural Health Transformation Plan?**

There are many eligibility criteria (listed in question 1) and entity location is one eligibility category. Attachment E of the RHTP identifies the rural-eligible counties class sizes 2A-8.

3. **Will eligibility be determined by the zip codes per the HRSA-defined rural census tracts?**

The entity must certify that it provides services to residents of RHTP-eligible rural counties classes 4-8 or residents in a HRSA rural health area for RHTP-eligible rural counties classes 2A and 3.

4. **If eligibility requires a physical location in an RHTP-eligible rural county, must that specific location have been in operation since the lookback date (December 29, 2025), or does the entity's overall Pennsylvania operation history satisfy that requirement for a more recently established rural service location?**

If the FQHC or FQHC look-alike has at least one location that has been in operation in an RHTP-eligible rural area since December 29, 2025, the entity can be eligible for a program payment.

5. **How should an entity with multiple locations submit an eligibility certification and attachments?**

An entity with multiple locations should submit only one eligibility certification and will be eligible for only one program payment not to exceed $300,000. **Note that this is different from other RHTP funding opportunities.**

The entity must identify all locations using the Entity Location List attachment.

6. **If an entity has locations in both rural and urban areas, is the entity still eligible for a payment?**

Yes, the entity is still eligible for a program payment if all locations operate on the same instance of the EHR system and at least one location is located in an RHTP-eligible rural county class 2A-8. For example, an FQHC in the Southwest region that has 13 locations in rural counties and two locations in Allegheny County would be eligible for a program payment even though two of the locations are in Allegheny County. Those two Allegheny County locations should be included on the Entity Location List attachment if they will benefit from the payment.

7. **Are FQHCs and FQHC look-alikes eligible for funding if they already have a CEHRT system?**

Yes. FQHCs and FQHC look-alikes are eligible for funding if they already have a CEHRT system. This funding can be used for purchasing and implementing a CEHRT system in accordance with 45 CFR § 170.315; and becoming a participant in one of the Commonwealth's five certified health information organizations ("HIOs") and fully onboarding to the statewide health information exchange ("HIE"), the Pennsylvania Patient and Provider Network ("P3N").

8. **Can an FQHC or FQHC look-alike use this funding for upgrades, expansions, or interoperability-related enhancements to an existing CEHRT system?**

No, this funding may not be used for upgrades, expansions, or interoperability-related enhancements to an existing CEHRT system. However, if an FQHC or FQHC look-alike is transitioning its CEHRT system to a system specifically designed for FQHCs and FQHC look-alikes, that is not considered an upgrade, expansion, or enhancement to an existing CEHRT system. If the FQHC or FQHC look-alike is transitioning from a generalized CEHRT system to a system tailored to FQHCs or FQHC look-alikes, that is considered purchasing or implementing a CEHRT system and is an allowable use of funds.

9. **Are FQHC and FQHC look-alikes eligible for a payment if they are already onboarded to an HIO but want to change their CEHRT to a new system?**

Yes. FQHCs and FQHC look-alikes are eligible for funding if they already have a CEHRT system. This funding can be used for purchasing and implementing a CEHRT system in accordance with 45 CFR § 170.315; and becoming a participant in one of the Commonwealth's five certified HIOs and fully onboarding to the statewide HIE, the P3N.

10. **Must the physical location of the FQHC or FQHC look-alike have been in operation in an RHTP-eligible rural area since December 29, 2025?**

If the FQHC or FQHC look-alike has at least one location that has been in operation in an RHTP-eligible rural area since December 29, 2025, the entity can be eligible for a program payment.

11. **What can funding be used for?**

This funding can be used for purchasing and implementing a CEHRT system in accordance with 45 CFR § 170.315; and becoming a participant in one of the Commonwealth's five certified HIOs and fully onboarding to the statewide HIE, the P3N.

12. **If an FQHC or FQHC look-alike has a CEHRT, but is not connected directly to one of the 5 HIOS are they eligible for funding and reimbursement?**

Yes. Funding can be used solely for becoming a participant in one of the Commonwealth's five certified HIOs and fully onboarding to the statewide HIE, the P3N.

13. **Can an FQHC or FQHC look-alike use this funding to pay a third-party consultant to guide the transition and implementation of the CEHRT system and P3N HIO onboarding?**

Yes, payment to a third-party consultant to guide the transition and implementation of the CEHRT system and P3N HIO onboarding is an allowable cost.

14. **What are the Commonwealth's five certified HIOs?**

A list of the five P3N certified HIOs is available here: 2025-05-06-choose-your-hio.pdf

15. **What constitutes becoming a participant in one of the Commonwealth's five certified HIOs and fully onboarding to the statewide HIE, the P3N?**

Becoming a participant in one of the Commonwealth's **five certified HIOs** and fully onboarding to the statewide health information exchange (HIE), the Pennsylvania Patient and Provider Network ("P3N") means that the entity's EHR has functionality to share HL7 Admission, Discharge, and Transfer message documents (ADTs) and discharge summary/continuity of care documents (CCDs) as well as have the ability to query and retrieve Historical Lists (medications, allergies, etc.) and Longitudinal Medical Records. The standards for the document types listed above must meet CMS Meaningful Use standards which currently follow the United States Core Data for Interoperability (USCDI) - July 2022 - Version 3.

16. **Can a connection to a National E-Health Exchange satisfy the activity requirement to become a participant in one of the Commonwealth's five certified HIOs?**

No.

17. **Where can I learn about additional funding opportunities and the requirements for those opportunities?**

All funding opportunities will be listed here: https://www.pa.gov/agencies/dhs/programs-services/healthcare/rural-health/rhtp-funding-opportunities

Funding opportunities will also be shared with the RHTP listserv.