



December 20, 2024

Information Collection Request Title: Health Resources and Services Administration (HRSA) Uniform Data System (UDS), OMB No. 0915-0193 – Revision.

In compliance with the requirement for opportunity for public comment on proposed data collection projects of the Paperwork Reduction Act of 1995, HRSA announces plans to submit an Information Collection Request (ICR), to the Office of Management and Budget (OMB). Prior to submitting the ICR to OMB, HRSA seeks comments from the public regarding the burden estimate, below, or any other aspect of the ICR.

HRSA specifically requests comments on:

- (1) the necessity and utility of the proposed information collection for the proper performance of the agency's functions;
- (2) the accuracy of the estimated burden;
- (3) ways to enhance the quality, utility, and clarity of the information to be collected; and
- (4) the use of automated collection techniques or other forms of information technology to minimize the information collection burden.

Waimānalo Health Center is offering brief comments as it relates to (3) ways to enhance the quality, utility, and clarity of the information to be collected:

Currently, Hawaii State Medicaid allows Behavioral Health providers to provide telehealth services from a site other than a FQHC, as their home for example. Primary care providers do not have this opportunity under Medicaid, thereby, decreasing access to care.

Given other states are able to provide primary care from home allowing for increased access, Waimānalo Health Center would be interested in **adding metrics on how telehealth improves access to the underserved and whether or not requiring the provider to be in the FQHC matters for health outcomes.**

Thank you for the opportunity to provide comment.

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