

Advanced Bay Area Medical Associates (ABAMA)

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Date: September 10, 2025

Health Resources and Services Administration (HRSA)
Attn: Information Collection Request – STD Entity Documentation
U.S. Department of Health and Human Services

Subject: Comments on Proposed Changes to STD Entity Documentation and Shipping Address Requirements

Dear HRSA,

On behalf of Advanced Bay Area Medical Associates (ABAMA), I appreciate the opportunity to provide comments on the proposed revisions published on August 7, 2025, regarding data collection requirements for STD clinic enrollment, recertification, and shipping address registration.

1. Documentation Requirements for STD Entities

We fully support HRSA's commitment to ensuring program integrity and appropriate eligibility verification. However, we are concerned that the proposed documentation requirements—particularly for subgrantees—create unintended burdens that may limit access to the 340B program for eligible STD clinics.

- Many STD subgrantee clinics, including ours, do not have direct access to the CDC notice of award issued to state or local governments.
- Subrecipient agreements vary widely by state and locality and often do not include the level of detail HRSA is now requiring (e.g., grant numbers, notice of opportunity numbers, and terms and conditions).
- Amending state or local agreements may not be feasible, as local governments are often unwilling to renegotiate or reissue award documents for compliance purposes.

We urge HRSA to consider alternative forms of documentation for subgrantees, such as:

- Acceptance of official award letters from state or local governments that confirm funding source and eligibility.
- Allowing subgrantees to provide attestations or certifications when award documents do not include the newly required fields.

2. Shipping Address Information

We understand the importance of accurate shipping address documentation. However, requiring clinics to designate ownership and classify each shipping site at registration, recertification, or for every change request adds a significant administrative burden.

We request that HRSA:

- Provide clear definitions of shipping site categories (e.g., what qualifies as a “health care delivery site” vs. “pharmacy”).
- Consider simplifying reporting requirements to avoid duplicative submissions at registration and recertification.
- Allow flexibility for covered entities to provide explanations when ownership structures are complex.

3. Impact on Patient Care

The proposed requirements, while intended to protect program integrity, could unintentionally strain small and community-based STD clinics with limited administrative staff and funding. Increased documentation burdens may slow registration, risk lapses in eligibility, and ultimately reduce patient access to affordable medications and services.

Conclusion

We respectfully request that HRSA refine these proposed requirements to ensure they achieve program integrity without creating unnecessary barriers for eligible STD clinics. We encourage HRSA to engage further with covered entities, subgrantees, and local health departments to develop feasible documentation standards that reflect real-world practices.

Thank you for considering our comments.

Sincerely,

LaChauna Stalks
Practice Manager
Advanced Bay Area Medical Associates