



Area Designation Issues & Problems

Designation of health services areas will be an important, initial step in the implementation of the Health Resources Planning (HRP) program. Several major issues and problems have been identified in our planning and preliminary implementation efforts to date relative to area designation (AD). Those efforts have been based largely upon H.R. 16204 and the draft House Committee report.

1. Only two objective AD requirements are legislatively mandated. They relate to population and SMSAs, and compliance can be readily determined. To what extent do we want to effectively limit the AD requirements to these and allow governs wide latitude within the dynamics at work within their own States, in waking designations?
2. Waivers to both the minimum population and SMSA requirements, are permitted. It is assumed that relatively few waivers should be granted. To what extent, however, do we want to try to "influence" the designations to be made by Governors through the criteria employed in reviewing waiver requests, granting or denying them? (For example, we probably want to discourage governors from chipping up existing areas that now have reasonably effective functioning CHP or other agencies and meet the mandated requirements.)
3. Approval (or disapproval) of proposed designations, including waiver requests, is reserved to the Secretary. Who should exercise on his behalf the official as opposed to the effective approval authority? (It is assumed that regional offices will work the principal responsibility for reviewing proposed designations, and that their recommendations will be tantamount to approval in the great majority of instances.)
4. A small ad hoc review panel consisting of both regional (RO) and central office (CO) Staff, has been suggested to handle exceptions. What should constitute an exception? For example, all requested waivers, or only those where RO staff and CO staff disagree; any designation that meets the population and SMSA requirements but which, for whatever reasons a RO recommends disapproval?
5. Governors are required to submit their AD plans within 90 days after the initial notice in the Federal Register (FR); and the Secretary in turn must publish approved designations in the FR within 150 days of that notice. Within those 60 days review must take place. Little time will remain after review to (1) negotiate substantive revisions required as a result of waiver requests denied or other non-approval actions or (2) for the Secretary to

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designate acceptable areas in lieu thereof. Should a minimum grace period of 30 or 60 days be permitted? With or without such a grace period, who at the Federal level should be responsible for designating areas when negotiations have failed; and how should this be done?