

From: [Eric Davies](#)
To: [HRSA Paperwork](#)
Subject: [EXTERNAL] Public Comment: Health Center Program Forms-OMB No. 0915-0285-Revision
Date: Friday, February 13, 2026 10:06:38 AM

I am providing the following comment, as a health center consultant, related to the simplification of the BPHC's Health Center Program Forms.

Form 5B: the format for listing zip codes on Form 5B, which designates the formal service area, is very confusing to track and manage. The alignment of sites and service area zip codes is often not a 1:1 correlation. For many health centers, one zip code may be served by several health center sites, which results in the same zip code showing up on multiple site listings on Form 5B. When analyzing and/or looking to add or delete zip codes, it is challenging to do so when the same zip codes show up across several sites and the “ordering” of zip codes aligned with each site seems random.

“Sites” - and – “Service Area” are two separate interlinked components of scope of project. I suggest a separate form be developed to delineate “Service Area Zip Codes.” Perhaps rather than retiring Form 5C, consider redesigning it to be the form to designate the service area boundaries. The form could list each designated zip code only once. Ideally the service area form directly links to Form 5B, and on Form 5B the designated zip code(s) served by a site are checked off as the zip codes would be prepopulated on Form 5B from the Zip code/service area form (new Form 5C?). Adding or deleting zip codes would occur on the zip code form, and then should auto-update to the Form 5B.

CIS: When sites are added or deleted on Form 5B, if there are service area implications, then the CIS form should enable changes to the zip code/service area form as well as on 5B. The CIS module could ask, e.g., if the site being added:

- a. Is to be located within an existing service area zip code
- b. Will it primarily serve other currently designated to zip codes;
- c. Will a new zip code or multiple zip codes be added through the addition of this site. If so, then the zip codes would be added to the zip code form (new 5C?), and correlated with the zip codes served by the site on 5B. The same process could apply to deleting sites and zip codes if applicable.

It should be noted that on the UDS Report, zip codes are not broken out by site – only by patient origin. Sites are components within a service area and a service area is a critical component of the scope of project. It seems appropriate to have a more defined and simpler way to identify the service area boundaries.

As an example, I have extracted the zip codes for five sites of an Ohio health center where there is significant overlap (I color-coded the zip codes across sites to show the duplication). The amount of duplication of the same zip codes under different sites makes analyzing, tracking and managing “the service area” very challenging

Malabar Care Connect

Saved Service Area Zip Code(s) 44907, 44906, 44903, 44904, 44905, 44902, 44901

Shelby Health & Wellness Center

Saved Service Area Zip Code(s) 44887, 44878, 44875

Mansfield Family Health 2

Saved Service Area Zip Code(s) 44875, 44906, 44905, 44907

Third Street Community Clinic, Inc.

Saved Service Area Zip Code(s) 44907, 44906, 44902, 44901, 44905, 44904, 44903

Five Points Primary Care

Saved Service Area Zip Code(s) 44902, 44906, 44904, 44903

Cornerstone OB/GYN

Saved Service Area Zip Code(s) 44906, 44901, 44905, 44904, 44902, 44903

Thank you for your consideration. Please contact me if you have any questions regarding my comments.



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