

COCHS' Submitted Comments: HRSA PIN 2024-05

Summary of the JI-R Individuals PIN Comments:

Chapter	Comments
II. PURPOSE OF THIS POLICY INFORMATION NOTICE	I am writing to express concerns regarding the new policy initiative from HRSA that permits federally qualified health centers (FQHCs) and look-alikes to extend healthcare services to incarcerated individuals 90 days prior to their release. While this policy is a step forward in bridging healthcare gaps for some incarcerated populations, it notably excludes pretrial detainees, who represent a significant portion of the jail population. The exclusion of pretrial detainees from this policy is particularly concerning given that the majority of individuals in jails are held for short durations while awaiting trial. During this critical period, detainees often experience abrupt discontinuation of ongoing treatments, including essential medications and substance use disorder support. This break in continuity of care can lead to severe health repercussions. Incorporating FQHCs in the initial screening and ongoing care of incarcerated individuals, including pretrial detainees, could substantially mitigate health risks by maintaining continuity of care. This approach would ensure that detainees continue to receive their community-based healthcare services, thereby preventing the deterioration of their health during an already vulnerable time. As it currently stands, the policy's benefits are only accessible post-sentencing, thus failing to address the immediate healthcare needs of a large fraction of the incarcerated population. By extending FQHC services to include pretrial detainees, HRSA can significantly enhance the effectiveness of healthcare delivery within the correctional system, ensuring that all incarcerated individuals, regardless of their trial status, have access to necessary medical care. This policy adjustment is not only a matter of public health but also of justice and equity. Ensuring that all individuals within the correctional system receive adequate healthcare is imperative to improving outcomes and reducing recidivism. I urge HRSA to reconsider the scope of this policy to include pretrial detainees, thereby fostering a more comprehensive and effective healthcare system that truly addresses the needs of all incarcerated individuals.