**Title X Subrecipient Onboarding Work Plan: Phase 2**

**Purpose:** The purpose of this tool is to help Title X grantees plan, communicate, and implement an onboarding process for new Title X subrecipients.

**How to use:** Insert grantee and subrecipient information where indicated. As needed, customize the suggested Phase 2 goals, action steps, and tasks to meet your and/or your subrecipient’s unique needs. For each task, determine the timeline for completing the task, who is responsible for completing it, and how you will know whether the task has been completed. For an overview of onboarding, refer to [Onboarding New Title X-Funded Agencies: A Toolkit for Grantees](https://www.fpntc.org/resources/onboarding-new-title-x-funded-agencies-toolkit-grantees).

*[Insert* ***Grantee Name/Logo****]*

*[Insert* ***Grantee Contact Name and Contact Information****]*

*[Insert* ***Subrecipient Agency Name****]*

*[Insert* ***Subrecipient Contact’s Name and Contact Information****]*

| Phase 2 Goal: During the second phase of onboarding, the grantee provides training and technical assistance; supports the subrecipient in finalizing policies, procedures, and clinical protocols; and works collaboratively to help the subrecipient provide quality family planning services in compliance with Title X program requirements, Quality Family Planning Recommendations (QFP), and other guidance. To enhance collaboration, the grantee should avoid using punitive language with the subrecipient and present any concerns as opportunities for improvement.  |
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**Action Step 1: Organize Phase 2 onboarding work.**

| Timeline | Task | Responsible | Indication of Completion  |
| --- | --- | --- | --- |
|  | Fill in Subrecipient Onboarding Phase 2 Work Plan tasks, timelines, responsible individuals, and indications of completion. |  | Filled in Phase 2 Work Plan  |
|  | Ensure the onboarding process is progressing according to timelines outlined in the Title X Subrecipient Policy, Administrative, Clinical, and Fiscal Onboarding Assessments and Checklists.  |  | Updated Title X Subrecipient Policy, Administrative, Clinical, and Fiscal Onboarding Assessments and Checklists. |

**Action Step 2: Support the subrecipient in understanding and implementing Title X-compliant policies, procedures, and clinical protocols.**

| Timeline | Task | Responsible | Indication of Completion  |
| --- | --- | --- | --- |
|  | Using the [Putting the QFP into Practice Toolkit](https://www.fpntc.org/resources/putting-qfp-practice-series-toolkit), provide technical assistance to ensure the subrecipient understands how to implement clinical requirements and quality family planning services.  |  | Meeting minutes, technical assistance reports |
|  | Ensure the subrecipient has the [Title X Policy Templates](https://www.fpntc.org/resources/title-x-policy-templates) and [National Family Planning & Reproductive Health Association Clinical Protocols Checklist](https://www.fpntc.org/resources/national-family-planning-reproductive-health-association-clinical-protocols-checklist), and support them in developing all required Title X policies and clinical protocols. |  | Policies and protocols approved by the grantee |
|  | Provide technical assistance to ensure the subrecipient understands and implements fiscal requirements, including the:* Total program concept, described in [Understanding the Total Program Concept](https://www.fpntc.org/resources/understanding-total-program-concept)
* Confidential billing approach, outlined in the [Challenges to Patient Confidentiality](https://www.fpntc.org/resources/challenges-patient-confidentiality-potential-breaches-outside-health-center-infographic)
* Cost analysis requirements
* Title X sliding fee schedule, illustrated in the [Integrating Title X with Primary Care: Developing and Implementing Compliant Sliding Fee Discount Schedules](https://www.fpntc.org/resources/integrating-title-x-primary-care-developing-and-implementing-compliant-sliding-fee)
* Grantee policy on income verification
* Grantee fiscal reporting requirements and fiscal review tool
 |  | Meeting minutes, technical assistance reports |
|  | Give the subrecipient an overview of the grantee’s quality improvement and/or quality assurance program, including guidance for required activities and reporting.  |  | Meeting minutes, guidance report |

**Action Step 3: Provide technical assistance to support the subrecipient in readying their** **electronic health record (EHR) for alignment with Title X- specific documentation requirements and FPAR data submission.**

| Timeline | Task | Responsible | Indication of Completion  |
| --- | --- | --- | --- |
|  | Using the [Title X Family Planning Annual Report Forms and Instructions](https://www.hhs.gov/opa/sites/default/files/fpar-forms-instructions-reissued-oct-2016.pdf) and [Preparing Your EHR for FPAR](https://www.fpntc.org/resources/preparing-your-ehr-fpar) guidance, provide instructions and technical assistance for the network’s FPAR data submission procedures.  |  | Meeting minutes, technical assistance reports |
|  | Before the official FPAR data submission, have the subrecipient share test or actual FPAR data and any additional grantee-required data. |  | Test or actual FPAR data, other grantee-required data  |
|  | Promptly review the data and provide timely feedback and technical assistance to address any concerns.  |  | Feedback documented, technical assistance report |
|  | Confirm that Title X-required documentation fields are “live.” |  | Screenshots  |

**Action Step 4: Support the subrecipient in ensuring that Information and & Education (I&E) materials and Community Participation, Education, and Program Promotion (CPEP) plans are in place and meet requirements.**

| Timeline | Task | Responsible | Indication of Completion  |
| --- | --- | --- | --- |
|  | Determine if the grantee or the subrecipient will assume responsibility for I&E requirements. |  | Meeting minutes, confirmation of evaluation plan |
|  | Orient the subrecipient to the I&E process that will be implemented. |  | Meeting notes or documentation of orientation |
|  | If the subrecipient assumes responsibility for I&E: Give the subrecipient the [I&E Toolkit](https://www.fpntc.org/resources/information-and-education-materials-review-toolkit) and confirm that the subrecipient has a plan to meet I&E requirements.  |  | I&E tools provided to subrecipient, confirmation of I&E plan |
|  | If the grantee assumes responsibility for I&E: Use the [I&E Toolkit](https://www.fpntc.org/resources/ie-toolkit) to complete the review of I&E materials, communicate results to the subrecipient, and confirm that the subrecipient has a plan to meet I&E requirements. |  | Subrecipient notified of which materials were approved and which did not meet the standard  |
|  | Review CPEP requirements with the subrecipient.  |  | Meeting minutes |
|  | Confirm that the subrecipient has a CPEP plan that follows the [CPEP Plan Template](https://www.fpntc.org/resources/community-participation-education-and-program-promotion-cpep-plan-template). |  | CPEP Plan |

**Action Step 5: Evaluate the subrecipient’s compliance with Title X requirements and grantee policies.**

| Timeline | Task | Responsible | Indication of Completion  |
| --- | --- | --- | --- |
|  | Use the [Privacy Audit Form](https://www.fpntc.org/sites/default/files/resources/fpntc_peit_priv_audit_form.pdf) and the [Challenges to Patient Confidentiality–Potential Breaches Outside the Health Center Infographic](https://www.fpntc.org/resources/challenges-patient-confidentiality-potential-breaches-outside-health-center-infographic) to evaluate the subrecipient’s adherence to Title X confidentiality standards, and then provide recommendations as needed.  |  | Completed Privacy Audit Form, documentation of recommendations |
|  | Conduct clinical observations at subrecipient service sites.* Identify a clinical member of the grantee staff to conduct observations.
* Ensure the observer gets verbal consent from any clients they observe.
* Complete the [Family Planning and Related Preventive Health Services Checklist](https://www.fpntc.org/resources/family-planning-and-related-preventive-health-services-checklists-women-and-men) and the [Observational Contraceptive Counseling Checklist.](https://www.fpntc.org/resources/observational-contraceptive-counseling-checklist)
* Provide feedback and additional training to the subrecipient, as needed.
 |  | Completed Observational Contraceptive Counseling Checklists or other observation review tool, additional training plans |
|  | After providers have received Title X training and had an opportunity to practice their skills, use the [Clinical Chart Review Tool](https://www.fpntc.org/resources/clinical-chart-review-tool) to conduct chart reviews. |  | Meeting minutes, summary of chart review findings |
|  | Meet with the subrecipient’s front desk and billing staff to ensure they implement a Title X-compliant sliding fee scale and charge clients appropriately, in line with the [Defining Family Income for Title X Charges, Billing, and Collections Job Aid](https://www.fpntc.org/resources/defining-family-income-title-x-charges-billing-and-collections-job-aid) and [Collecting Co-Pays and Applying Sliding Fee Scales: A Job Aid for Front Desk Staff](https://www.fpntc.org/resources/collecting-co-pays-and-applying-sliding-fee-scales-job-aid-front-desk-staff). |  | Meeting minutes, subrecipient’s sliding fee scale, subrecipient’s billing records that demonstrate appropriate charges |
|  | Meet with subrecipient’s financial staff to ensure they have adequate processes for collecting third party payments. Review the four [Best Practices in the Financial Management Change Package](https://www.fpntc.org/resources/financial-management-change-package) and provide technical assistance as needed.  |  | Meeting minutes and documentation of technical assistance as indicated |