# Title X Subrecipient Administrative Assessment and Onboarding Checklist

**Purpose:** This checklist is designed to help grantees assess whether subrecipient clinical services align with [Title X Statutes, Regulations, and Legislative Mandates](https://opa.hhs.gov/grant-programs/title-x-service-grants/title-x-statutes-regulations-and-legislative-mandates), [Quality Family Planning Recommendations (QFP)](https://www.cdc.gov/reproductivehealth/contraception/qfp.htm), and other guidance. Grantees can use this checklist in conjunction with the other checklists in the Onboarding Toolkit to identify which requirements a subrecipient has in place and which they still need to implement. This checklist can also be used to record grantee approval of their subrecipients meeting the required protocols and procedures.

**How to use:** Conduct this assessment for each subrecipient or clinical site. Gather information to complete this assessment by interviewing subrecipient or service site staff and, if helpful, by conducting site visits, document reviews, and electronic health record (EHR) reviews.

Step 1: Insert the grantee’s name and logo, subrecipient information, and other details where indicated. This checklist outlines key protocols and procedures necessary for Title X compliance, but it is not an exhaustive list of all protocols and procedures that a grantee may require. The grantee can add other items to this checklist or delete unnecessary ones.

Step 2: Save the modified checklist and use it throughout the onboarding process to document review of subrecipient protocols and procedures. Grantees may find it beneficial to review the checklist with subrecipients periodically or prefer to encourage subrecipients to use the checklist for their own tracking purposes. If so, grantees may consider saving the checklist in a format, such as Google Docs, that is easily shareable.

Step 3: At the onset of the onboarding process, the grantee should review the subrecipient’s existing protocols and procedures and approve any that meet Title X expectations immediately.

Step 4: Assign due dates for any protocols and procedures that the subrecipient will need to develop and/or implement. Grantees may want to assign a certain number of protocols and procedures to be reviewed in monthly or quarterly batches to provide manageable goals. Incorporate outstanding activities into the Title X Subrecipient Onboarding Work Plans. Remember that this will be an iterative process between grantee and subrecipient staff.

Step 5: Establish a process to ensure that the grantee approves new Title X-specific protocols before the protocols are sent through the subrecipient agency’s approval process.

Step 6: Once all protocols and procedures have been approved, notify the subrecipient and grantee staff who participated in this task. Acknowledge everybody’s contribution, recognizing the team work involved, and celebrate!

## Title X Subrecipient Administrative Assessment and Onboarding Checklist

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

*[Insert* ***Subrecipient or Clinical Site Name***]

*[Insert* ***Date of Assessment***]

*[Insert* ***Grantee Contact Information and Assessment Participants***]

*[Insert* ***Subrecipient Contact Information and Assessment Participants***]

The numbers listed in the first column of the table below correspond to the numbering system used in the federal [Title X Program Review Tool](https://www.fpntc.org/resources/title-x-program-review-tool) (PRT). The assessment components relate to the subrecipient or clinical site’s compliance with the applicable statutes, regulations, and policy. Evidence of adherence may include, but is not limited to: policies, procedures, protocols, documentation of training, review of medical records, direct visual confirmation to ensure that what is contained in written policy or instructions is actually being carried out, or any other form of documentation that substantiates operation in accordance with the applicable   
Title X Program requirement and/or policy.

| **REQUIRED DOCUMENTS**  Subrecipients must have documentation and evidence, such as the items listed below, that support and demonstrate compliance with Title X Program requirements. These documents ensure that what is contained in written policy or instructions is actually being carried out and substantiate that the project is operating in accordance with Title X Program expectations. The [Title X Program Review Tool](https://www.fpntc.org/resources/title-x-program-review-tool) contains additional information. | **DUE DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Project Administration | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1, 2, 9: Consent form informs clients that services are offered on a voluntary basis, may not be a prerequisite to other services, and note any limitations to confidentiality. |  |  |  |  |
| 4: Posted patient bill of rights or other signage demonstrating non-discrimination in services. |  |  |  |  |
| 9: Notification made to clients of any potential for disclosure of their confidential health information to policyholders when the policyholder is someone other than the client. |  |  |  |  |
| 9: HIPAA privacy forms are provided to clients, and signed forms are collected as required. |  |  |  |  |
| 11: Notification of availability of interpreter services are posted in the waiting area. |  |  |  |  |
| Provision of High-Quality Family Planning Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3: Copies of materials translated into other languages are available to clients. |  |  |  |  |
| Adolescent Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3, 4: Ensure that the medical record allows for clear documentation that family participation was encouraged during minors’ decision to seek family planning services. |  |  |  |  |
| 5: Ensure that the medical record allows for clear documentation that minors were counseled on how  to resist attempts to being coerced into engaging in sexual activities. |  |  |  |  |
| 6: Mandated reporting directions and/or forms are readily available. |  |  |  |  |
| Referral for Social and Medical Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3: Referral list is available and recently reviewed for accuracy. |  |  |  |  |
| 3: Memoranda of understanding (MOUs) and/or referral agreements are available with: |  |  |  |  |
| * Emergency care agencies |  |  |  |  |
| * HIV/AIDS care and treatment providers |  |  |  |  |
| Referral for Social and Medical Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| * Infertility specialists |  |  |  |  |
| * Primary and chronic care management providers |  |  |  |  |
| Community Education, Participation, and Engagement | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1, 2: Written community education, community engagement, and service promotion plan is complete. |  |  |  |  |
| Information and Education (I&E) | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1, 4: Meeting minutes or other documentation of action taken on I&E materials are available. |  |  |  |  |
| Quality Improvement and Quality Assurance (QI/QA) | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1, 2: QI/QA work plan is in place and active. |  |  |  |  |
| Prohibition of Abortion | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: Signed staff assurances (acknowledgement) document(s) |  |  |  |  |

| **STAFF TRAININGS**  Title X staff must receive appropriate and adequate training. These [required trainings](https://www.fpntc.org/sites/default/files/resources/fpntc_fed_training_reqs_2019-07-11.pdf) support staff in operating in accordance with Title X Program requirements and the QFP. The [Training Essentials for Title X Grantees Toolkit](https://www.fpntc.org/resources/grantee-training-essentials) provides a summary of training resources. | **DUE DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Project Administration | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: Voluntary and non-coercive services |  |  |  |  |
| 2: Services not a prerequisite for eligibility or services |  |  |  |  |
| 3: Cannot coerce to undergo abortion or sterilization |  |  |  |  |
| 4: Non-discrimination in services |  |  |  |  |
| 9: Client confidentiality and privacy |  |  |  |  |
| Provision of High-Quality Family Planning Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3: Cultural competency |  |  |  |  |
| 7: Advancing health equity |  |  |  |  |
| Adolescent Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3: Family participation |  |  |  |  |
| 5: Sexual coercion |  |  |  |  |
| Staff Training | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: Orientation and in-service training |  |  |  |  |
| 2: Mandatory reporting |  |  |  |  |
| Staff Training | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3: Required adolescent counseling *(also listed under 3 and 5 within Adolescent Services)* |  |  |  |  |
| 4: RHNTC’s Title X Training Requirements Summary Job Aid |  |  |  |  |
| Prohibition of Abortion | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 2: Facilitation of abortion |  |  |  |  |

| **AGENCY PROCESSES**  Subrecipients must implement processes, such  as those listed below, to operationalize Title X requirements. | **DUE DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Project Administration | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 6: Observation during the intake process verifies that services are provided without the imposition of any durational residency requirement or a requirement that the client be referred by a physician. |  |  |  |  |
| 9: The health records system(s) has safeguards in place to ensure adequate privacy, security, and appropriate access to personal health information. |  |  |  |  |
| 10: Family planning services are implemented in ways that make services as accessible as possible for clients. |  |  |  |  |
| 11: Family planning services are responsive to the diverse needs of the clients and communities served. |  |  |  |  |
| Additional Special Terms and Requirements | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 6: Copyright allowances are observed. |  |  |  |  |
| 7: Acknowledgement of federal grant support is listed where needed. |  |  |  |  |
| Provision of High-Quality Family Planning Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 8: Needs assessment is done periodically to ensure that services are available when and where clients need them. |  |  |  |  |
| Adolescent Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 6: Mandatory reporting forms and/or necessary documentation process are readily available to staff. |  |  |  |  |
| Community Education, Participation, and Engagement | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: Needs assessment is done periodically to assess the community’s awareness of and need for access to family planning services. |  |  |  |  |
| Information and Education (I&E) | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1, 3: I&E materials committee membership and approval process is documented. |  |  |  |  |
| Quality Improvement and Quality Assurance | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3: Data collection allows for timely and accurate Family Planning Annual Report (FPAR) reporting. |  |  |  |  |

| **SITE EVALUATION**  Subrecipients must ensure that site facilities comply with the Title X Expectations below. | **DUE DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Project Administration | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 9: Physical layout(s) allows for confidentiality. |  |  |  |  |
| 10: Clinic location(s) are accessible. |  |  |  |  |
| 10: Clinic environment(s) is welcoming. |  |  |  |  |
| Provision of High-Quality Family Planning Services | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 8: Facility/facilities are accessible. |  |  |  |  |
| Information and Education (I&E) | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 4: Educational materials available at the service sites have been approved by the I&E Committee. |  |  |  |  |
| Prohibition of Abortion | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 3: Review of client information and educational materials demonstrates that they don’t promote abortion. |  |  |  |  |

| **SUBCONTRACTS**  Subrecipients wishing to subcontract any responsibilities or services must maintain a  written agreement consistent with Title X Program requirements and approved by the grantee.  The [Title X Program Review Tool](https://www.fpntc.org/resources/title-x-program-review-tool) contains  additional information. | **DUE DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Project Administration | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: Contracts with subrecipients specify that all subrecipient agencies are to provide services without subjecting individuals to any coercion. |  |  |  |  |
| 2: Contracts with subrecipients specify that all subrecipient agencies provide services solely on a voluntary basis. |  |  |  |  |
| 9: Contracts with subrecipients include the expectation that all service sites safeguard client confidentiality. |  |  |  |  |