



**Title X Program Review Tool:  
ADMINISTRATIVE SECTION**

**ADMINISTRATION:** The Delegate agency maintains administrative systems and processes consistent with Title X and other Federal grant requirements.

Appropriate administrative policies and practices include compliance with the criteria listed in this section. Administrative Program Review consultants may review the documents listed below to aid in assessing compliance:

- Organizational Chart(s)
- Job Descriptions – Medical Director, Clinicians and Key Staff members
- Administrative/Clinical Policies and Procedures
- Personnel Policies
- Copies of Delegate Agency Agreements
- Current Title X Program Work Plan
- Current Title X Program Evaluation Plan
- Service Site Information (such as locations and hours of operations)
- Management Policies and Procedures
- Emergency/Disaster Plans
- LEP Related Policies and Procedures
- Delegate Policy for Compliance with State reporting laws
- Articles of Incorporation, By-laws, Board of Directors Membership, Board Orientation Process, Board Meeting Minutes, as appropriate
- Policies and procedures for meeting Privacy and HIPAA regulations
- Insurance Policy Documents
- Approval Documentation for Family Planning Research

The Administrative Section of the Program Review is based on the following Title X and other Federal grant requirements:

- Title X Legislation and Title X Implementing Regulations, 42 CFR Part 59
- Program Guidelines for Family Planning Project Grants for Family Planning Services, 2001
- OPA Program Instructions: 06-01; 99-1; 98-1
- Uniform Administrative Requirements for Awards and Subawards to Institutions of Higher Education., Hospitals, Other Nonprofit Organizations, and Commercial Organizations, 45 CFR Part 74
- Uniform Administrative Requirements for Grants and Cooperative Agreement to State, Local and Tribal Governments, 45 CFR Part 92
- HHS Grants Policy Statement
- The Privacy Act of 1974 5 U.S.C § 552a
- Basic HHS Policy for the Protection of Human Subjects, 45 CFR Part 46
- Title VI, Civil Rights Act, 1964 and Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
- Office of Civil Rights Nondiscrimination on Basis of Handicap in Programs and Activities Receiving or Benefiting From Federal Financial Assistance, 45 CFR Part 84
- Occupational Safety and Health Administration Standards, 29 CFR 1910 Subpart E Exit routes, Emergency Action Plans and Fire Plans and Subpart H Hazardous Waste Operations and Emergency Response
- Rehabilitation Act of 1974, Section 504
- Title I Americans with Disabilities Act
- Age Discrimination Act of 1975
- Title IX of the Education Amendments of 1972
- HHS Office of Public Health and Science Grant Application , OPHS-1



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Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>A. Voluntary Participation</b>				
1. Delegate agency meets Title X regulations for client voluntary participation				<i>Write/Type Comments in the Space Below</i>
a) Delegate agency Title X services are provided solely on a voluntary basis ( <i>Title X Statute, Sections 1001 &amp; 1007; 42 CFR 59.5 (a) (2); Title X Guidelines: Section 5.1</i> )	M			
b) There is no indication that clients are subject to coercion in use of any particular method of family planning ( <i>42 CFR 59.5 (a) (2); Title X Guidelines: Section 5.1</i> )	M			
c) Client's acceptance of a family planning service is not a prerequisite to eligibility or receipt of any other service offered by the Delegate agency ( <i>Title X Statute, Section 1007; 42 CFR 59.5 (a) (2); Title X Guidelines: Section 5.1</i> )	M			
d) Project personnel must be informed that they may be subject to prosecution if they coerce or they try to coerce any person to undergo abortion or sterilization procedures ( <i>42 CFR 59.5 (2) footnote 1; Title X Guidelines: Section 5.1</i> )	M			



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<b>B. Confidentiality</b>				<i>Write/Type Comments in the space below</i>
1. Delegate agency meets confidentiality requirements of Title X. <i>(42 CFR 59.11; Title X Guidelines as listed below)</i> <ul style="list-style-type: none"> <li>• Staff disclosures <i>(Title X Guidelines: 5.2)</i></li> <li>• Client billing <i>(Title X Guideline: Section 6.3)</i></li> <li>• Client privacy and the facility <i>(Title x Guidelines: Section 6.4)</i></li> <li>• Employee records <i>(Title X Guidelines: Section 6.5)</i></li> <li>• Referrals and follow-up results <i>(Title X Guidelines: Section 7.4)</i></li> <li>• Reporting abnormal test results <i>(Title X Guidelines: Section 8.3)</i></li> <li>• Adolescent Services <i>(Title X Guidelines: Section 8.7)</i></li> <li>• Medical records <i>(Title X Guidelines: Section 10.3)</i></li> </ul>				
a) Policies are in place regarding agency's compliance with the Privacy Act	M			
b) No information obtained by staff is disclosed without written consent, except as required by law	M			
c) Delegate agency ensures that summary, statistical, or other forms of information disclosed, without a client's consent, does not allow individual clients to be identified	M			
d) Delegate agency provides required Family Planning data elements such that client confidentiality is protected	M			



**Title X Program Review Tool:  
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Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>C. Conflict of Interest</b>				<i>Write/Type Comments in the space below</i>
Delegate agency has established policies to prevent employees, consultants, or members of governing/advisory bodies from using their positions for private gain as required by Title X (45 CFR 74.42; 45 CFR 92.36; HHS Grants Policy Statement II-7; Title X Guidelines: Section 5.3)	M			
<b>D. Liability Coverage</b>				
1. Title X recommendations for liability coverage are met by the Grantee (Title X Guidelines: Section 5.4)				<i>Write/Type Comments in the space below</i>
a) Delegate agency ensures adequate liability coverage for all segments of the project funded by the grant	S			
b) Governing board has obtained liability coverage for its members	S			
<b>E. Human Subjects Clearance (Research)</b>				
1. Delegate agency complies with Federal regulations regarding the use of Title X clients in research				<i>Write/Type Comments in the space below</i>
a) Delegate agency has advised the Regional Office in writing of research projects involving Title X clients (HHS Grant Policy Statement; Title X Guidelines: Section 5.5)	M			
b) Delegate agency acknowledges adherence to 45 CFR Part 46 and its requirements	M			



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<b>F. Prohibition of Abortion</b>				
1. Delegate agency is in full compliance with the Title X Statute, Section 1008 prohibiting abortion as a method of family planning ( <i>Title X Statute, Section 1008; 42 CFR 59.5 (a) (5); Grant Policy Statement, II-22; Title X Guidelines: Section 3.3</i> )				<i>Write/Type Comments in the space below</i>
a) The Delegate agency is in compliance with Title X Statute, Section 1008	M			
<b>G. Structure of the Delegate Agency</b>				
1. Delegate maintains responsibility for quality, cost, accessibility, acceptability, reporting and performance of grant-funded activities of sub-recipient/contract agency				<i>Write/Type Comments in the space below</i>
a) Delegate has signed agreements with Grantee to provide services consistent with Title X ( <i>45 CFR 74 Subpart C: 74.40-48, as applicable; 45 CFR Subpart C: 92.37; 42 CFR 59.5 (b) (9); Title X Guidelines: Section 6.1</i> )	M			
(1) Where Delegate agencies wish to subcontract responsibilities or services, a written agreement consistent with Title X and approved by Grantee is maintained by the sub-recipient ( <i>Title X Guidelines: Section 6.1</i> )	M			



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b) Delegate participates in the ongoing policy decision making of the project, including input into establishing standards and guidelines <i>(42 CFR 59.5 (a) (10); Title X Guidelines: Section 6.1)</i>	M			
c) Delegate agencies project activities consistent with Title X and Grants Management programmatic and fiscal requirements <i>(Title X Guidelines: Sections 6.1 and 7.1)</i>	M			
<b>Referrals and Follow-Up</b>				
2. Delegate has formal agreement with referral agencies where necessary <i>(42 CFR 59.5 (b) (8); Title X Guidelines: Section 7.4)</i>				<i>Write/Type Comments in the space below</i>
a) Required services (as listed in Title X Guidelines: Section 8.0) are provided by referral (1) If yes, go to b) (2) If no, proceed to H.1				
b) A formal, written agreement is established with the referral agency:	M			
(1) Agreement includes a description of the services provided	M			
(2) Agreement includes cost reimbursement information	M			



**Title X Program Review Tool:  
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Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>H. Governance – Private Not-For-Profit Organizations Only</b>				
1. The Delegate agency meets requirements for a legal entity with not-for profit status ( <i>Appropriate State Not for Profit Corporations Act; Organization’s Articles of Incorporation and By-Laws</i> )				<i>Write/Type Comments in the space below</i>
a) Documentation of IRS 501 (c) (3) or other IRS not-for-profit status on file	M			
b) Governing Board is appropriately constituted:				
(1) The Agency has a formally constituted Board	S			
(2) An orientation process for new Board members is in place	S			
(3) The Governing Board has a set of By-Laws.	S			
(4) By-Laws are reviewed and revised (if necessary) by the Governing Board, annually or in accordance with the Articles of Incorporation	S			
(5) Board meeting minutes demonstrate the Agency operates as per By-Laws and in accordance with Title X regulations	S			
(6) The By-Laws address the following functions of the Governing Board:	S			
• Terms of Membership				
• Appointment of committees				
• Frequency of meetings designated				
• Number of members specified				
• Definition of a quorum outlined				
• Procedures for the appointment/election of officers				



**Title X Program Review Tool:  
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Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>I. Planning and Evaluation</b>				
1. Grantee assesses that the project is competently and efficiently administered ( <i>42 CFR 59.5 (b) (6) &amp; (7); 59.7; Title X Guidelines: Section 6.2</i> )				<i>Write/Type Comments in the space below</i>
a) Delegate has developed goals and objectives for the project period. The goals must: <ul style="list-style-type: none"> <li>(1) Be clearly stated in writing</li> <li>(2) Be based on needs assessment</li> <li>(3) Have specific objectives that are measurable</li> <li>(4) Be consistent with Title X regulations</li> </ul> b) The project includes an evaluation component that identifies indicators by which the program measures achievement of objectives	M M M M M			



**Title X Program Review Tool:  
ADMINISTRATION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>J. Facilities and Accessibility of Services</b>				
1. Facilities are appropriate for Title X clients				<i>Write/Type Comments in the space below</i>
a) Facilities are geographically accessible for population served (e.g., close to mass transit, etc.) (Title X Guidelines: Section 6.4) Hours of operation are convenient for those seeking services (e.g., evening and or weekend hours). (Title X Guidelines: Section 6.4) Facilities are adequate to provide necessary services, are comfortable, ensure provide privacy for clients, and are designed to enhance workflow (Title X Guidelines: Section 6.4)	S			
b) Delegate has written policies regarding access to timely quality language assistance services to limited English proficient persons that are consistent with the Office of Civil Rights Policy Guidance on Prohibitions Against National Origin Discrimination As It Affects Persons With Limited English Proficiency (Title VI, Civil Rights Act, 1964; LEP Guidance; Grants Policy Statement 2007)	M			
c) Project does not discriminate on the basis of handicap and, when viewed in its entirety, the facility is readily accessible to people with disabilities (45 CFR Part 84.4)	M			
d) All Delegates, sub-recipients and Title X clinics are required to have a written plan for management of emergencies (29 CFR 1910 Subpart E)	M			



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ADMINISTRATION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
e) The clinic facilities meet applicable standards established by Federal, state, and local governments ( <i>e.g., local fire, building, and licensing codes</i> )	M			
f) Health and safety issues within the facility fall under the authority of OSHA. Disaster plans and emergency exits are addressed under 29 CFR 1910 Subpart E ( <i>Exit routes, Emergency Action Plan and Fire Plans</i> ) and Subpart H (Hazardous Waste Operations and Emergency Response). The basic requirements of these regulations include:				
(a) Disaster plans ( <i>e.g., fire, bomb/terrorism, earthquake, etc.</i> ) have been developed and are available to staff	M			
(b) Staff understands assigned emergency escape routes	M			
(c) Staff has completed training and understands their role in an emergency or natural disaster	M			
(d) Exits are recognizable and free from barriers	M			
<i>Note: Requirements for medical emergencies are addressed under the Clinical Services Section (Guidelines: Section 7.3)</i>				



**Title X Program Review Tool:  
ADMINISTRATION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>K. Personnel</b>				
1. Delegate agency complies with Title X requirements related to personnel				<i>Write/Type Comments in the space below</i>
a) Written personnel policies regarding nondiscrimination in recruitment, selection, performance evaluation, discipline, promotion, and termination have been established ( <i>Title VI Civil Rights Act; Rehabilitation Act, Section 504; Title I Americans with Disabilities Act; Title X Guidelines: Section 6.5</i> )	M			
b) A formal grievance mechanism is available for all staff ( <i>Title X Guidelines: Section 6.5</i> )	M			
c) Project staff is broadly representative of the population served ( <i>42 CFR 59.5 (b) (10); Title X Guidelines: Section 6.5</i> )	S			
d) Project staff is sensitive to and able to deal effectively with the cultural characteristics of the client population ( <i>42 CFR 59.5 (b) (10); Title X Guidelines: Section 6.5</i> )	S			
e) Written personnel performance evaluations are compliant with their approved agency policy.	M			



**Title X Program Review Tool:  
ADMINISTRATION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
2. Personnel management is consistent with Title X guidance.				<i>Write/Type Comments in the space below</i>
a) An organizational chart shows clear lines of authority (OPHS-1; OPA/OFP Guidelines for Title X Grant Application Preparation)	S			
b) Written job descriptions exist for key personnel (OPHS-1; OPA/OFP Guidelines for Title X Grant Application Preparation)	S			
c) Project is administered by qualified program director (42 CFR 59.6 (7); Title X Guidelines: Section 6.5)	M			
d) Personnel records are kept confidential (Title X Guidelines: Section 6.5)	M			
e) Delegate has protocols for client care provided under the project (Title X Guidelines: Section 6.5)	M			
f) Professional licenses are verified prior to employment and documentation of current licensure maintained (Title X Guidelines: Section 6.5)	M			
<i>Note: Requirements for Medical Director are addressed under the Clinical Services Section (Title X Guidelines: Section 7.0.)</i>				



**Title X Program Review Tool:  
ADMINISTRATION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>L. Training and Technical Assistance</b>				
1. Project meets training requirements as outlined by Title X ( <i>42 CFR 59.5 (b) (4) Title X Guidelines: Section 6.6</i> )				<i>Write/Type Comments in the space below</i>
a) Project provides for orientation and in-service training for all project personnel ( <i>includes staffs of sub-recipients agencies and service sites</i> )	M			
b) Project personnel participate in continuing education	S			
c) Documentation of continuing education is maintained in staff personnel records	S			
d) A plan and a process is in place that evaluates the scope and effectiveness of staff training program	S			



Note: Compliance with the financial reporting is addressed in the Financial Section of this tool.				
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 <b>Title X Program Review Tool: ADMINISTRATION SECTION</b>				
Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>N. Publications</b>				
1. The Delegate agency meets Title X requirements as they relate to copyright and publication material ( <i>45 CFR 74.36; 45 CFR 92.34; Title X Guidelines: Section 6.10</i> )				<i>Write/Type Comments in the space below</i>
Any publications or other media developed by Delegate agency using Federal funds acknowledge Federal grant support	M			
a) The Government has unrestricted use of Grantee publications funded by Title X	M			
b) Grantee ensures that publications developed under Title X do not contain information contrary to program requirements or accepted clinical practice	S			



**Title X Program Review Tool:  
ADMINISTRATION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>O. Federal Assurances</b>				
1. As a recipient of the Title X award, no evidence was found to indicate the Delegate was not in compliance with the following Federal Assurances/Certifications:				<i>Write/Type Comments in the space below</i>
a) Assurances-Non-Construction Programs ( <i>Standard Form 424B</i> ), including, but not limited to:	M			
(1) Prohibiting discrimination based on race, color, national origin ( <i>Title VI of Civil Rights Act of 1964</i> )	M			
(2) Prohibiting discrimination based on handicap ( <i>Rehabilitation Act of 1973, Section 504</i> )	M			
(3) Prohibiting discrimination based on age ( <i>Age Discrimination Act of 1975</i> )	M			
(4) Prohibiting discrimination on the basis of sex ( <i>Title IX of the Education Amendments of 1972</i> )	M			
(5) Assurance that the Delegate has:				
(a) Institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project as described in the award ( <i>42 CFR 59.7 (4), (5) &amp; (7); SF424 A &amp; B</i> )	M			
(b) Granted the awarding agency free access to examine all records, books, papers, and	M			

<p>documents related to the award (45 CFR 74.53; 45 CFR 92.42)</p> <p>(c) Title X Assurance of Compliance (Title X Statute, Section 1001; 45 CFR 59.5 (a) (6); OPA Program Instructions 98-1; Grant Application Kit Enclosure)</p>	<p>M</p>			
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**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

**CLINICAL SERVICES:** The Delegate provides family planning services to clients that are consistent with Title X regulations and with nationally recognized standards of care.

Appropriate clinical services include compliance with the criteria listed in this section. Clinical Program Review consultants may review the documents listed below to aid in assessing compliance:

- Delegate Family Planning Clinical/Medical Policies, Protocols, Standards and Procedures
- Medical record charting forms (such as consent forms, medical history forms, etc.) and written policies for accepted medical record documentation
- Information Related to the Medical oversight of the program
- Written emergency procedures
- Referral agreements and lists of referral agencies/organizations and physicians
- Written policies for the use of interpreters
- Educational material routinely given to clients
- State pharmacy regulations
- State laws regarding requirements for midlevel clinicians.
- Quality assurance and monitoring processes, procedures, schedules and reports
- Delegates project Work Plan

The family planning service sites to be visited should make available the following types of medical records for the clinical consultant to review. Medical records should be for recent visits (i.e., clients seen within the last year, with all lab results in the chart).

- initial comprehensive visit patients
- adolescent patients (can be initial or returning visits)
- male family planning patients
- problem visit patients (i.e., abnormal Pap follow-up, method problems, vaginal discharge, etc.)
- pregnancy testing patients
- sterilization patients, if applicable

The Clinical Section of the Program Review is based on the following Title X and other Federal grant requirements:

- Title X Legislation and Title X Implementing Regulations, 42 CFR Part 59
- Sterilization of Persons in Federally Assisted Family Planning Projects, 42 CFR Part 50 Subpart B
- Program Guidelines for Family Planning Project Grants for Family Planning Services, 2001
- Program Instructions: 06-01 & 99-1; 05-01; 03-01; 98-1



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>A. Client Services</b>				
1. Delegate meets the following criteria for Title X clinical services:				<i>Write/Type Comments in the space below</i>
a) Delegate provides clinical, informational, educational, social and referral services relating to family planning (42 CFR 59.5(b)(2); Title X Guidelines: Section 7.0)	M			
b) Clinical care component operates under the responsibility of a physician with experience or special training in family planning (42 CFR 59.5 (b) (6); Title X Guidelines: Section 6.5)	M			
c) Delegate offers a broad range of acceptable/effective FDA approved contraceptive methods on-site or by referral (Title X Statute, Section 1001; 42 CFR 59.5 (a)(1); Title X Guidelines: Section 7.0)	M			
(1) Methods include natural family planning (Title X Statute, Section 1001; 42 CFR 59.5 (a)(1))	M			
(2) Delegate service system provides family planning services to adolescents (Title X Statute, Section 1001; 42 CFR 59.5 (a) (1); Title X Guidelines: Sections 2.0 and 8.7)	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>B. Service Plan and Protocol</b>				
1. Delegate's service plan has been successfully implemented				<i>Write/Type Comments in the space below</i>
a) Delegate provided the full range of services as outlined in the service plan ( <i>Title X Guidelines: Section 7.1</i> ) (1) If the Delegate has an exemption for providing a particular service, make a note in the comment section verifying OPA approval and the duration of the waiver	M			
b) Written clinical protocols are in place at each service delivery site and are consistent with Title X Guidelines and nationally recognized standards for medical care ( <i>Title X Guidelines: Sections 6.5 and 7.1</i> )	O			
(1) Service site clinical protocols and plans for education are signed off by the Medical Director and approved by the Grantee ( <i>Title X Guidelines: Section 7.1</i> )	M			
(2) Delegate has a mechanism in place to assure that protocols are current and reviewed and updated regularly ( <i>Title X Guidelines: Section 10.4</i> )	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>C. Procedural Outline</b>				
1. The following services are offered at the initial comprehensive visit and properly documented in the clients' charts: <i>(Title X Guidelines: Section 7.2)</i>				<i>Write/Type Comments in the space below</i>
a) Education b) Counseling c) Informed consent d) History e) Examination f) Laboratory testing g) Follow up and referrals	M M M M M M M			
2. The following components, appropriate to the purpose of the visit, must be offered and documented on all clients' charts: <i>(Title X Guidelines: Section 7.2)</i>				<i>Write/Type Comments in the space below</i>
a) The following must be documented on all return visits: (1) History (2) Examination (3) Laboratory testing (4) Follow-up and referrals b) Client return visits <i>(excluding routine supply visits)</i> include an assessment of the client's health status, current complaints, and evaluation of birth control method, and opportunity to change methods	M M M M S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>D. Emergencies</b>				
1. Written protocols for medical emergencies are current and include the following situations: <i>(Title X Guidelines: Section 7.3)</i>				<i>Write/Type Comments in the space below</i>
a) Vaso-vagal reactions/syncope <i>(fainting)</i>	M			
b) Anaphylaxis <i>(severe allergic reactions)</i>	M			
c) Cardiac arrest/respiratory difficulties	M			
d) Shock/Hemorrhage <i>(uncontrolled bleeding)</i>	M			
e) Emergencies requiring EMS transport	M			
f) After hours emergencies and management of contraceptive emergencies	M			
2. Staff is prepared to manage clinic-based emergencies (e.g., fire, vandalism) <i>(Title X Guidelines: Sections 6.4 and 7.3)</i>				<i>Write/Type Comments in the space below</i>
a) Staff members know their role during an emergency	M			
b) Training for emergencies (including CPR) is available to staff	S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

<b>Criteria for Title X Compliance</b>		<b>C</b>	<b>NC</b>	<b>Comments/Documentation/Explanation</b>
<b>E. Referrals and Follow-up</b>				
1. Written policies/procedures are in place for follow-up on referrals made for abnormal findings ( <i>42 CFR 59.5 (b) (8); Title X Guidelines: Section 7.4</i> )				<i>Write/Type Comments in the space below</i>
a. Follow-up policy is sensitive to the client's concern for confidentiality and privacy	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
2. Referrals for care beyond the scope of the project (e.g., non-family planning, emergency care, etc.) are made consistent with Title X requirements (42 CFR 59.5 (b) (8); Title X Guidelines: Section 7.4)				<i>Write/Type Comments in the space below</i>
a) Proper arrangements are made to provide pertinent client information to the referral provider, with appropriate safeguards for confidentiality	M			
b) Client's consent was obtained for referral arrangements (except as required by law)	M			
c) Documentation that client was advised of referral and counseled on their responsibility to comply with referral	M			
3. Delegate maintains a current referral list (42 CFR 59.5 (b) (8); Title X Guidelines: Section 7.4)				<i>Write/Type Comments in the space below</i>
a) Referral list includes health care providers, local health departments, hospitals, voluntary agencies, and health services projects, and other Federal programs	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>F. Required Services</b>				
1. Delegate provides consent forms consistent with Title X requirements:				<i>Write/Type Comments in the space below</i>
a) Written, informed, voluntary consent is obtained prior to services <i>(Title X Guidelines: Section 8.0)</i>	M			
b) Informed contraceptive method specific consent is appropriately obtained meaning: <i>(Title X Guidelines: Sections 8.0-8.1)</i>				
(1) The contraceptive consent is method specific	M			
(2) Method consent form(s) used are approved by the service site Medical Director	M			
(3) Method specific consent is updated when there was a major change in client's health or method	M			
(4) Consent form is language appropriate, i.e., written in a language understood by the client or translated and witnessed by an interpreter	M			
(5) Clients are provided information on:				
(a) Contraception benefits and risk	M			
(b) Potential side effects	M			
(c) Complications	M			
(d) Discontinuation issues	M			
(e) Danger signs of method chosen	M			
(f) Effectiveness	M			
(g) Explanation of alt. methods if appropriate (ECP)	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
c) All consent forms contain a statement that the client has been counseled and provided appropriate informational material and understands the content of both <i>(Title X Guidelines: Section 8.1)</i>	M			
d) Signed informed consent forms are maintained in the client's record <i>(Title X Guidelines: Section 8.1)</i>	M			
<b>2. Sterilization complies with Title X requirements: <i>(42 CFR Part 50, Subpart B)</i></b>				<i>Write/Type Comments in the space below</i>
a) Federally approved consent form is used <i>(Found in the Appendix to 42 CFR Part 50, Subpart B, Section 50.201)</i>	M			
b) Required signatures are secured. These include:				
(1) Individual sterilized	M			
(2) Interpreter	M			
(3) Person who obtains the consent	M			
(4) Physician performing the sterilization	M			
c) Copy of 42 CFR Part 50, Subpart B (most current edition) is available for staff to review their responsibilities when participating in sterilization procedures	S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>G. Client Education</b>				
1. Written plan for client education is current and consistent with Title X requirements: <i>(Title X Guidelines: Section 8.1)</i> An acceptable plan has:				<i>Write/Type Comments in the space below</i>
a) Goals and content outlined to ensure consistency and accuracy of information provided by staff	M			
b) Signature approval of Delegate and service site Medical Director <i>(Title X Guidelines: Section 7.1)</i> ; Ed. Is presented in Medical Protocols	M			
c) Client education requires:				
(1) Proper documentation of education in the chart	M			
(2) Presentation of education in an unbiased manner	S			
(3) Presentation of education appropriate for client's age, knowledge, language, and socio-cultural background	S			
(4) A mechanism has been established to determine if the information provided the client was understood	S			
<i>Note: If the Delegate uses checklists for documenting required education components, such as family involvement, confidentiality, avoiding sexual coercion, etc., a detailed written protocol for what is included in that education should be reviewed</i>				



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
2. Education services offered allow client to make informed decisions and take positive health actions. When appropriate, this includes: <i>(Title X Guidelines: Section 8.1; OPA 03-01)</i>				<i>Write/Type Comments in the space below</i>
a) Information on the range of services, purpose and sequence of clinic procedures	M			
b) Information on basic female and male reproductive anatomy and physiology, if indicated	S			
c) Instruction on BSE/TSE ( <i>breast or testicular self exams</i> )	S			
d) Actions to reduce transmission of HIV and STDs/STIs	M			
e) Importance of recommended tests and procedures	M			
f) Value of fertility regulation in maintaining family/individual health	S			
g) Use of specific methods of contraception and adverse effects	M			
h) Health promotion/disease prevention information (i.e., nutrition, exercise, smoking cessation, alcohol/drug abuse, domestic violence, and sexual abuse)	S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>H. Counseling</b>				
1. Counseling services comply with Title X requirements: <i>(Title X Guidelines: Section 8.2)</i>				<i>Write/Type Comments in the space below</i>
a) Documentation of counseling is included in client record	M			
b) Counselors are sufficiently knowledgeable to provide accurate information regarding the benefits and risk, safety, effectiveness, potential side effects, complications, discontinuation issues and danger signs of the various contraceptive methods	M			
(1) Counselors should be objective, nonjudgmental, culturally aware, and sensitive to individual differences of clients	S			
(2) Counselors should be knowledgeable about other services offered by the clinic	S			
<i>Note: If the Delegate uses checklists for documenting required counseling components, a detailed written protocol for what is included in that counseling should be reviewed</i>				



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
2. Method counseling is provided, when indicated, and includes: <i>(Title X Guidelines: Section 8.2)</i>				<i>Write/Type Comments in the space below</i>
a) Results of physical exam and lab studies	M			
b) Effective use of contraceptive methods, benefits, and efficacy of the methods	M			
c) Possible side effects/complications	M			
(1) How to discontinue the method selected and information regarding back-up method used	M			
d) Planned return schedule	M			
e) Emergency 24-hour telephone number	M			
f) Location where emergency services can be obtained	M			
g) Appropriate referral for additional services, if needed	M			
3. Project offers STD/STI and HIV prevention education according to nationally recognized standards:				<i>Write/Type Comments in the space below</i>
a) There is evidence STD/STI and HIV prevention education is available to clients at all sites. At a minimum, this includes:	M			
(1) Education about HIV Infection and AIDS	M			
(2) Information on risks, infection prevention, and referral services	M			
(3) Discussion of personal risk and risk reduction steps	O			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>I. History, Physical Assessment and Lab Testing</b>				
1. <b>History:</b> Information related to client medical histories are consistent with Title X requirements: <i>(Title X Guidelines: Section 8.3)</i>				<i>Write/Type Comments in the space below</i>
a) <b>INITIAL Comprehensive Visit:</b> A complete MEDICAL history is documented at the initial comprehensive visit for both female and male clients and updated at subsequent clinical visits Comprehensive medical history must include:	M			
(1) Past medical history <i>(i.e., significant illnesses, hospitalization, surgery, blood transfusions or exposure to blood products, and chronic or acute medical conditions)</i>	M			
(2) Allergies	M			
(3) Current medications <i>(including OTC medications)</i>	M			
(4) Tobacco, alcohol, and drug use <i>(both prescription and other drugs)</i>	M			
(5) Immunization and Rubella status	M			
(6) Review of systems	M			
(7) Pertinent history of immediate family members	M			
(8) Partner history <i>(i.e., injectable drug use, multiple partners, risk history for STDs/STIs and HIV, sex with men, sex with women, or both)</i>	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

<b>Criteria for Title X Compliance</b>		<b>C</b>	<b>NC</b>	<b>Comments/Documentation/Explanation</b>
b) <b>FEMALE reproductive history</b> must include the following: (1) Contraceptive use past and current (including adverse effects) (2) Menstrual history (3) Sexual history (4) Obstetrical / Gynecological history (5) STD/STI, including HBV (6) HIV infection (7) Pap testing history (8) In utero exposure to diethylstilbestrol (DES)	M M M M M M M M			
c) <b>MALE reproductive history</b> must include the following: (1) Sexual history (2) STD/STI, including HBV (3) HIV infection (4) Urological conditions	M M M M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>2. Physical Assessment</b>				<i>Write/Type Comments in the space below</i>
Information related to female and male physical assessments is consistent with Title X requirements ( <i>Title X Guidelines: Section 8.3; OPA 03-01</i> ) and with national standards for care (e.g., ACOG; ACS; ASCCP; USPSTF), as appropriate:	M			
a) <b>INITIAL FEMALE</b> physical assessment should include:				
(1) Height/weight	S			
(2) Thyroid, heart, lung, extremities, breasts, abdomen, pelvis and rectum	S			
(3) STD/STI and HIV Screening, as indicated	S			
(a) If services are not provided on-site, documentation of appropriate referral for those at risk should be noted in client's chart	S			
(4) Clinic must stress the importance of and provide for health maintenance screening. This includes:				
(a) Blood pressure	M			
(b) Breast exam	M			
(c) Pelvic exam	M			
(d) Pap testing	M			
(e) Colo-rectal cancer screening	M			
(f) STD/STI and HIV screening	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
(5) Where not provided, client deferral or decline of a health maintenance service is properly documented	M			
(a) Counseling includes information on possible health risks associated with declining or delaying preventive screening tests or procedures	M			
b) Requirements for physical examination and laboratory tests stipulated in the prescribing information for a specific contraceptive method are followed	M			
(1) Physical exam and preventive services are completed within 3 months of initial visit	M			
(a) When services are deferred, reason for deferral is documented	M			
(b) In no case is the physical exam delayed beyond 6 months unless the clinician has documented a compelling reason	M			
(c) Protocols have been developed for ensuring deferrals are not lost to follow-up	S			
c) <b>INITIAL MALE physical assessment</b> should include:	S			
d) Height/weight	S			
e) Thyroid, heart, lung, extremities, breasts, abdomen, genitals, and rectum	S			
f) STD/STI and HIV testing, as indicated	S			
g) Clinic encourages and provides for health maintenance screening procedures. These include:	S			
(1) Blood pressure	S			
(2) Colo-rectal cancer screening	S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>3. Laboratory Testing:</b> Information related to client laboratory testing are consistent with Title X requirements: <i>(Title X Guidelines: Section 8.3)</i>				<i>Write/Type Comments in the space below</i>
a) The Delegate provides onsite pregnancy testing	M			
b) The Delegate provides the following tests when required by the specific contraceptive method <i>(FDA or prescribing recommendations)</i> . They may be provided for the maintenance of health status and/or diagnostic purposes either on-site or by referral:	M			
(1) Anemia assessment	M			
(2) Gonorrhea and Chlamydia test	M			
(3) Vaginal wet mount	M			
c) Clients are notified of abnormal lab test results				
(1) Notification procedure maintains client confidentiality	M			
d) Review current CLIA certificate status (expiration date)	M			
e) The delegate has a laboratory protocol manual that are compliant with all federal and state regulations.				
(1) Lab manual is approved by medical director				
(2) A competent professional has oversight and responsibility for all lab operations				
f) Staff that provide laboratory services are trained				
<b>4. Revisits</b> are individualized and based on client need as required by Title X: <i>(Title X Guidelines: Section 8.3)</i>				<i>Write/Type Comments in the space below</i>
a) Revisit schedules must be based on client need for:				
(1) Education	M			
(2) Counseling	M			
(3) Clinical care beyond that provided at previous visit	M			
b) First time users of hormonal methods, IUDs, diaphragms and cervical caps, should be scheduled for early revisit	S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>J. Fertility Regulation</b>				
1. Reversible Contraception complies with Title X requirements: <i>(Title X Guidelines: Sections 8.2 and 8.4)</i>				<i>Write/Type Comments in the space below</i>
a) When indicated, clients are given more than one method to minimize the risks of STDs/STIs, HIV and pregnancy	S			
b) Consistent and correct use of condoms is encouraged, as appropriate	S			
2. Permanent Contraception ( <i>Sterilization</i> ) complies with Title X requirements: <i>(42 CFR Part 50, Subpart B)</i>				<i>Write/Type Comments in the space below</i>
a) Counseling and consent process must assure that the client's decision to undergo sterilization is completely voluntary	M			
b) Federal sterilization regulations must be complied with when sterilization is performed or arranged for by the project	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>K. Infertility Services</b>				
1. Delegate provide at a minimum, Level I infertility services as required by Title X: <i>(Title X Guidelines: Section 8.5)</i>				<i>Write/Type Comments in the space below</i>
a) Level I services include:				
(1) Initial infertility interview	M			
(2) Education	M			
(3) Physical examination	M			
(4) Counseling	M			
(5) Referral	M			
b) Delegate provides Level II infertility services <i>(e.g., semen analysis, assessment of ovulatory function and postcoital testing, etc.)</i>	O			
c) Delegate does <u>not</u> provide Level III infertility services	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>L. Pregnancy Diagnosis and Counseling</b>				
1. Delegate provide pregnancy diagnosis consistent with Title X regulations: <i>(42 CFR 59.5 (a)(5); Title X Guidelines: Section 8.6)</i>				<i>Write/Type Comments in the space below</i>
a) Pregnancy diagnosis and counseling is provided to all clients in need of these services	M			
b) Pregnancy diagnosis includes:				
(1) History	M			
(2) Pregnancy testing	M			
(3) Physical assessment (including pelvic exam)	S			
(a) When exam not performed onsite, the provider documented client was counseled of the importance to receive an exam as soon as possible, preferably within 15 days	M			
c) If ectopic pregnancy is suspected, the client is referred for immediate diagnosis and treatment	M			





**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>M. Adolescent Services</b>				
1. Delegate provides contraceptives services to adolescents consistent with Title X requirements: <i>(Title X Statute Section 1001; Title X Guidelines: Section 8.7)</i>				<i>Write/Type Comments in the space below</i>
a) Delegate ensures appointments for services to adolescents are provided as soon as possible	S			
b) Services are provided in a manner that does not assume that the adolescent is sexually active simply because they have come for family planning services	S			
c) Delegate complies with state requirements regarding notification or reporting of child abuse, child molestation, sexual abuse, rape, or incest <i>(OPA Program Instructions 06-01 and 99-1)</i>	M			
d) Adolescents are informed of the following family planning methods:				
(1) Abstinence	M			
(2) Contraceptives	M			
(3) Safer sex practices	M			
e) Counseling provided to adolescents prepares them to use a variety of methods effectively	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
f) Counseling sessions and needed follow-up are confidential	M			
g) Services are provided to minors are confidential and do not require written consent of parents or guardians	M			
h) There is no evidence that parents or guardians are notified before or after a minor has requested and received Title X services without the minors consent ( <i>Title X Statute Section 1001; OPA Program Instructions 98-1</i> )	M			
i) Policies and procedures must be in place to provide counseling to minors on how to resist coercive attempts to engage in sexual activities ( <i>OPA Program Instructions 98-1</i> )	M			
j) Counselors encourage family involvement in minors' decisions to seek family planning services, where appropriate.	M			
<b>N. Identification of Estrogen-Exposed Offspring</b>				
1. Clients with prenatal exposure to DES receive information/education and special screening either on-site or by referral ( <i>Title X Guidelines: Sections 8.3 and 8.8</i> )				<i>Write/Type Comments in the space below</i>
a) Clients born between 1940 through 1970 are asked about DES exposure	M			
b) Clients exposed receive information/education and special screening either on-site or by referral	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>O. Related Services (Optional Services)</b>				
1. If optional services are offered, skilled personnel and equipment are available:				<i>Write/Type Comments in the space below</i>
a) Delegate provides for the diagnosis and treatment of minor gynecologic problems (Vaginitis, UTI, etc.). <i>(Title X Guidelines: Section 9.1)</i>	S			
b) Delegate provides for detection and treatment of the more common STDS/STIs (e.g., GC, syphilis, Chlamydia, HIV) <i>(Title X Guidelines: Section 9.2)</i>	S			
c) Gonorrhea and Chlamydia tests are made available for clients requesting IUD insertions <i>(Title X Guidelines: Section 9.2)</i>	M			
d) If testing is done, Delegate must comply with state and local STD/STI reporting requirements <i>(Title X Guidelines: Section 9.2)</i>	M			
e) When treatment for a) or b) is provided on-site, appropriate follow-up measures are undertaken <i>(Title X Guidelines: Section 9.2)</i>	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>P. Special Counseling</b>				
1. Delegate meets the Title X requirements for special counseling: <i>(Title X Guidelines: Section 9.3)</i>				<i>Write/Type Comments in the space below</i>
a) When indicated, clients are offered appropriate counseling and referral for the following: (1) Future planned pregnancies / preconception counseling (2) Management of a current pregnancy (3) Other concerns (e.g., substance use and abuse, sexual abuse, domestic violence, genetic issues, nutrition, sexual concerns, etc.)	S S S			
<b>Q. Genetic Information and Referral</b>				
1. Delegate meets the Title X requirements for genetic information and referral: <i>(Title X Guidelines: Section 9.4)</i>				<i>Write/Type Comments in the space below</i>
a) Basic information regarding genetic condition is offered to clients who request or are in need of these services b) Referral systems should be in place for further genetic counseling and evaluation	S S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>R. Health Promotion/Disease Prevention</b>				
1. Delegate meets Title X requirements for health promotion: <i>(Title X Guidelines: Section 9.5)</i>				<i>Write/Type Comments in the space below</i>
a) Delegate provides or coordinates access to health promotion and disease prevention services	S			
b) Delegate considers the health problems in their community and has developed health promotion strategies to address these problems	S			
<b>S. Postpartum Care</b>				
1. Delegate meets Title X requirements for postpartum care: <i>(Title X Guidelines: Section 9.6)</i>				<i>Write/Type Comments in the space below</i>
a) If postpartum care is provided, it is directed toward assessment of the woman's physical health, initiation of contraception, and counseling and education related to parenting, breast feeding, infant care, and family adjustment	S			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>T. Equipment and Supplies</b>				
1. Equipment and supplies are appropriate for the type of care offered by the Delegate: <i>(Title X Guidelines: Section 10.1)</i>				<i>Write/Type Comments in the space below</i>
a) Equipment and supplies are appropriate to the type of care offered by the project (regular equipment calibration).	M			
b) Clinic follows applicable Federal and state regulations regarding infections control	M			
<b>U. Pharmaceuticals</b>				
1. Delegate meet Title X requirements as they relate to pharmaceuticals: <i>(Title X Guidelines: Section 10.2)</i>				<i>Write/Type Comments in the space below</i>
a) Each facility maintains an adequate supply and variety of drugs and devices to effectively manage the contraceptive needs of its clients.	M			
b) Delegate maintains the necessary drugs or devices for the provision of any other services it includes within the scope of the Title X project.	M			
c) Delegate complies with Federal and State laws relating to security and record keeping for pharmaceuticals and devices.	M			
d) Delegate has a system for identifying clients and methods in the event of a product recall or issue	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>V. Medical Records</b>				
1. Delegate meet Title X requirements as they relate to medical records: <i>(Title X Guidelines: Section 10.3)</i>				<i>Write/Type Comments in the space below</i>
a) A medical record is established for each client who obtains clinical services	M			
b) Medical records are retained in accordance with accepted medical standards and state laws Records must be:	M			
(1) Complete, legible, and accurate. <i>(Telephone encounters of a clinical nature are documented)</i>	M			
(2) Signed by the clinician <i>(name, title, date)</i>	M			
(3) Readily accessible	M			
(4) Systematically organized to facilitate prompt retrieval of information	M			
(5) Confidential, safeguarded against loss or use by unauthorized persons	M			
(6) Secured by lock when not in use	M			
(7) Available upon request to the client	M			
c) Content of Client Record: Record must contain sufficient information to identify the client, indicate contact information, justify clinical diagnosis, and warrant the treatment and end results. The required content includes:				
(1) Personal data	M			
(2) Scheduled revisits	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
(3) Medical history, physical exam, clinical findings, diagnostic/laboratory orders, results, and treatment	M			
(4) Documentation of continuing care, referral, and follow up	S			
(5) Informed consent(s)	M			
(6) Refusal of services	M			
(7) Allergies and drug reactions	M			
(8) Medical record allows for entries by counseling and social service staff	M			
d) Client financial information is kept separate from chart or there is no evidence that client services are withheld because of client's financial status	S			
e) Confidentiality and Release of Records:				
(1) A confidentiality assurance statement must appear in the client's record	M			
(2) HIV information is handled according to State law	M			
(3) A written consent of the client is required for release of personally identifiable information, except as may be necessary to provide services to the client or as required by law	M			
f) A written consent is obtained for release of personally identifiable information except as required by law	M			
g) Delegate has a mechanism to expedite the transfer of medical records to other providers upon client's request	M			



**Title X Program Review Tool:  
CLINICAL SERVICES SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>W. Quality Assurance</b>				
1. Delegate has a quality assurance system in place that provides for ongoing evaluation of project personnel and services ( <i>Title X Guidelines: Section 10.4</i> )				<i>Write/Type Comments in the space below</i>
a) The quality assurance system includes:				
(1) An established set of clinical, administrative, and programmatic standards by which conformity is maintained	S			
(2) A tracking system to identify clients in need of follow-up and / or continuing care	S			
(3) Ongoing medical audits to determine conformity with agency protocols	S			
(4) Peer review procedures to evaluate individual clinician performance	S			
(5) Periodic review and update of medical protocols	S			
(6) A process to elicit consumer feedback	S			
(7) Ongoing and systematic documentation of QA activities	S			



**Title X Program Review Tool:  
FINANCIAL SECTION**

**FINANCIAL MANAGEMENT:** The Delegate/sub-recipient<sup>1</sup> maintains a financial management system consistent with Title X and Federal grant requirements.

An appropriate financial management system includes compliance with the criteria listed in this section. Fiscal Program Review consultants may want to review the documents listed below to aid in assessing compliance:

Budgetary Control Procedures

- Notice of Grant Awards for the current and previous years
- Title X program budgets (including Program Income) , and Budget expenditure reports for the last two years
- Budget revisions
- Indirect Cost Rate Agreement or Allocation Plan for Administrative Costs
- Staff Time and Effort documentation and payroll records
- State PMS Cash Transaction Reports
- Board finance committee meeting minutes
- Sub-recipient agency expenditure reports

Accounting Systems and Reports

- Accounting/Internal Control policies and procedures and accounting system documentation (Fiscal Policy Manual)
- Independent Audit Reports for Delegate and sub-recipients
- Financial Status Reports
- General ledger reports and financial statements
- Payment Management System records
- Internal control documents

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<sup>1</sup> Flow-down of Requirements under Sub-awards and Contracts under HHS Grants: The terms and conditions in the HHS Grants Policy Statement apply directly to the recipient of HHS funds. The recipient is accountable for the performance of the project, program or activity; the appropriate expenditure of funds under the award; and all other obligations of the recipient, as cited in the Notice of Grant Award. In general, the requirements that apply to the recipient, including public policy requirements, also apply to sub-recipients and contractors under grants, unless an exception is specified. (*HHS Grant Policy Statement, January 1, 2007*)



**Title X Program Review Tool:  
FINANCIAL SECTION**

Charges, Billing and Collection Policies and Procedures	<ul style="list-style-type: none"><li>▪ Policies and procedures for Charges, Income Verification, Billing &amp; Collection</li><li>▪ Client Visit Records</li><li>▪ Cost Analyses; Schedule of Discounts; Charges for Services and Supplies; Client Billing/Receipt Statements; Bills to Third Parties</li></ul>
Procurement/Purchasing Procedures and Property Management	<ul style="list-style-type: none"><li>▪ Delegate maintains policies and procedures for procurement of services, equipment and supplies</li><li>▪ Delegate agency fiscal monitoring instruments and reports</li><li>▪ Inventory system records related to supplies, medications and equipment purchased with Title X funds</li><li>▪ Delegate and sub-recipient records of physical inventory for equipment and supplies</li></ul>
Fiscal Monitoring Information	<ul style="list-style-type: none"><li>▪ Delegate maintain policies/procedures/schedules/reports and/or tools for fiscal monitoring of sub-recipient agencies.</li></ul>



## **Title X Program Review Tool: FINANCIAL SECTION**

The Financial Section of the Program Review is based on the following Title X and other Federal grant requirements:

- Title X Legislation and Title X Implementing Regulations, 42 CFR Part 59
- Program Guidelines for Family Planning Project Grants for Family Planning Services, 2001
- OPA Program Instructions: 08-01; 05-03; 05-02; 97-1
- HHS Grant Policy Statement 2007
- Uniform Administrative Requirements for Awards and Subawards to Institutions of Higher Education., Hospitals, Other Nonprofit Organizations, and Commercial Organizations, 45 CFR Part 74
- Uniform Administrative Requirements for Grants and Cooperative Agreement to State, Local and Tribal Governments, 45 CFR Part 92
- Uniform Administrative Requirements for Grants and Agreements With Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations, OMB Circular A-110
- Cost Principles for State, Local and Indian Tribal Governments, 2 CFR Part 225, OMB Circular A-87
- Cost Principles for Non-Profit Organizations, 2 CFR Part 230, OMB Circular A-122
- Federal Register Notices related to Veterans Health Care Act of 1992, Title VI -- Drug Pricing Agreements SEC. 601, 602 Treatment of Prescription Drugs Procured by Department of Veterans Affairs or Purchased by Certain Clinics and Hospitals, 340B
- Generally Accepted Government Audit Standards (GASAS)
- Audits of States, Local Governments, and Non-Profit Organizations, OMB Circular A-133
- Appropriate State Not for Profit Corporations Act
- Organization's Articles of Incorporation and By-Laws
- Generally accepted Internal Control Procedures



**Title X Program Review Tool:  
FINANCIAL SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
1. Budgetary control procedures meet Title X and Federal grant requirements				<i>Write/Type Comments in the space below</i>
a) Delegate uses a budget to control its fiscal operations (45 CFR 74.21; 45 CFR 92.20)	M			
b) There is a separate budget applicable to Title X project (45 CFR 74.21; 45 CFR 92.20)	M			
c) The governing authority approves the Delegate budgets (Appropriate State Not for Profit Corporations Act; Organization's Articles of Incorporation and By-Laws)	S			
d) The Delegate operating budget for the Title X project is consistent with the approved budget (45 CFR 74.21; 45 CFR 92.20)	M			
e) The Chief Financial Officer or designee monitors the approved Title X budget expenditures (45 CFR 74.21; 45 CFR 92.20)	M			
f) The Delegate requests a budget revision when required, including: (1) Change in Project scope or objective (2) Change in key personnel, and (3) When sub-awarding or contracting work not approved in NGA (45 CFR 74.25; 45 CFR 92.30)	M			
g) The Delegate has appropriate cost centers to track and validate costs applicable to any NGA special conditions and/or special projects (i.e., HIV, project service expansion, etc.) (45 CFR 74.21; 45 CFR 92.20)	M			



**Title X Program Review Tool:  
FINANCIAL SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
h) The allocation of Administrative expense is direct or indirect (2 CFR 225 Apps. C & E; 2 CFR 230 App. A). (1) If the Delegate claims indirect costs: (a) Delegate has a Federally approved negotiated indirect rate (IDC) agreement for Administrative expenses (i) Is the IDC rate applied to salaries? (ii) Is the IDC rate applied to total direct costs? (iii) Is there another application of the IDC rate? Specify <b>OR</b> (b) Delegate has an accepted Administrative cost allocation plan with HHS or other cognizant Federal agency in order to claim indirect costs (2 CFR 225 Apps. C & E; 2 CFR 230 App. A) <i>Note: If Delegate does not use an IDC rate, inquire, review and document the allocation method used for charging administrative costs, if applicable (2 CFR 225 Apps. C &amp; E; 2 CFR 230 App. A)</i>	O			
i) Proper documentation of all income and expenditures is maintained (45 CFR 74.21; 45 CFR 92.20)	M			
j) Program income earned during the project period is used in accordance with the awarding agency NGA (45 CFR 74.21; 45 CFR 92.20)	M			
k) Charges of salaries/wages to the award are reflective of Title X activities. Time and effort documentation assures proper validation (2 CFR 225 App. B.8 h.; 2 CFR 230 App. B.8 m.)	M			
l) Charges to the award, including staff time and effort documentation, reconcile to PMS Transaction Reports and/or to the reconciliation of state draw-down actions	M			

(45 CFR 74. 21; 45 CFR 92.20)



**Title X Program Review Tool:  
FINANCIAL SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
2. Accounting Systems and Reports are consistent with Title X and Federal grant requirements				<i>Write/Type Comments in the space below</i>
<p>a) <b>Delegate fiscal oversight and audits</b></p> <p>(1) Delegate agencies have written accounting policies and procedures for determining reasonableness, allocability and allowablility of costs in accordance with Federal cost principles (45 CFR 74.21; 45 CFR 92.20)</p> <p>(2) Delegate monitors sub-recipient agencies as necessary to ensure Federal compliance with laws and regulations, and grant provisions (45 CFR 74.51; 45 CFR 92.40; OMB A-133-400(d))</p> <p>(3) Audits of Delegates are conducted in accordance with provisions of OMB Circular A-133 (OMB A-133;45 CFR 74.26; 45 CFR 92.26)</p> <p>(a) Delegate secures independent audits, including management letter annually (OMB A-133, 320(e) and 400(d))</p> <p>(b) Auditors meet established criteria for qualifications and independent audits (GAGAS standards and OMB A-133, 305)</p> <p>(c) Financial records must be available for review or audit by appropriate officials of the state agency (OMB A-133; 45 CFR 74.53; 45 CFR 92.42)</p> <p>b) <b>Maintenance of internal controls</b> Internal controls over Federal programs are maintained that provide reasonable assurance that the Delegate is managing the Federal award in compliance with applicable laws and regulations (OMB A-133, 300; 45 CFR 74.21; 45</p>	<p>M</p> <p>M</p> <p>M</p> <p>M</p> <p>M</p> <p>M</p>			

CFR 92.20; Accepted Internal Control Procedures)



**Title X Program Review Tool:  
FINANCIAL SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<p>(1) <u>Separation of duties</u> No one person has complete control over more than one key function or activity (e.g., authorizing, approving, certifying, disbursing, receiving, or reconciling) (45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures)</p>	M			
<p>(2) <u>Authorization and approval</u> Transactions are properly authorized and consistent with Federal requirements (45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures)</p>	M			
<p>(3) <u>Custodial and security arrangements</u> Responsibility for physical security/custody of assets is separated from record keeping/accounting for those assets (45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures)</p> <p>(a) Unauthorized access to assets and accounting records is prevented</p>	M			
<p>c) <b>Review and reconciliation</b> Systems are in place that allow for proper review and reconciliation of grant funds</p> <p>(1) Accounting records and documents are examined by employees who have sufficient understanding of the accounting and financial system to verify that recorded transactions actually took place and were made in accordance with policy and procedures (OMB A-133,300; 45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures)</p>	S			



**Title X Program Review Tool:  
FINANCIAL SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
(2) Delegate accounting records and documentation are compared with accounting system reports and financial statements to verify their reasonableness, accuracy, and completeness ( <i>OMB A-133,300; 45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures</i> )	S			
(3) Control principles are applied to all departmental operations (i.e., payroll; purchasing approval, receiving, and disbursement approval; equipment and supplies inventories; cash receipts; petty cash and change funds; billing; and accounts receivable) ( <i>OMB A-133,300; 45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures</i> )	M			
(4) Methods of drawing funds from the State Payment Management System and reconciliation of actual Title X expenditures comply with Federal requirements ( <i>45 CFR 74.21; 45 CFR 92.20</i> )	M			
(5) Delegate reconciles Title X cash receipts/collections to accounting system on either a daily or monthly basis ( <i>45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures</i> )	S			
<b>Fiscal reports</b>				
(1) Delegate submits a monthly reimbursement report ( <i>45 CFR 74.52; 45 CFR 92.41</i> )	M			
(2) <i>Delegate grant budgets are submitted by due date.</i>	M			
(3) <i>Revised grant budgets are submitted by due date.</i>	M			
(4) <i>Payment/cost policies are posted? (i.e., services are voluntary and no one is denied services based on their ability to pay)</i>	M			



**Title X Program Review Tool:  
FINANCIAL SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
3. Charges, billing, and collection procedures meet Title X and Federal grant requirements (42 CFR 59.2,59.5 (6)-(9); Title X Guidelines: Section 6.3; OPA Program Instructions 08-01 and 97-1)				<i>Write/Type Comments in the space below</i>
a) Delegate is responsible for implementation of policies and procedures for charging, income verification, billing, and collecting funds for services provided by the project ( <i>Title X Guidelines: Section 6.3</i> )	M			
(1) Policies and procedures are approved by the Delegate’s governing authority/board and the State Office ( <i>Title X Guidelines: Section 6.3</i> )	S			
(2) The manner in which the above policies/procedures are implemented ensures that priority for services is to persons from low-income families and ensures that the inability to pay is not a barrier to the receipt of services ( <i>45 CFR 59.5 (a)(6-8); OPA 08-01; OPA 97-1</i> )	M			
b) Charges, billing and collection system has the following characteristics: <b>Charges</b>				
(1) Charges are based on a cost analysis ( <i>42 CFR 59.5 (a) (8); Title X Guidelines: Section 6.3</i> )	M			
(2) A schedule of discounts ( <i>SOD</i> ) has been properly implemented ( <i>42 CFR 59.5 (a) (8); Title X Guidelines: Section 6.3</i> ). This includes:	M			
(a) Eligibility for discounts is documented in client’s financial record ( <i>Title X Guidelines: Section 6.3</i> )	M			
(b) <i>SOD</i> has sufficient proportional increments to ensure income is not a barrier to service ( <i>Title X Guidelines: Section 6.3</i> )	M			
(c) <i>SOD</i> is used for family incomes between 101–	M			

250% of FPL (42 CFR 59.5(a)(8))				
	<b>Title X Program Review Tool: FINANCIAL SECTION</b>			
<b>Criteria for Title X Compliance</b>		<b>C</b>	<b>NC</b>	<b>Comments/Documentation/Explanation</b>
(d) Eligibility for discounts for minors who receive confidential services is based on the income of the minor (42 CFR 59.2 – Definitions; OPA 97-1)	M			
(3) Delegate ensures that there is a mechanism in place throughout the Title X project for waiving fees of individuals who, for good cause, are unable to pay but do not qualify for the SOD (42 CFR 59.2 – Definitions; Guidelines: Section 6.3)	M			
(4) Clients at or below 100% of FPL are not charged for Title X services (Title X Statute, Section 1006; 42 CFR 59.5(a)(7))	S			
(5) Client income is re-evaluated annually (Title X Guidelines: Section 6.3)	M			
(6) There is no evidence clients are denied services or are subjected to variation in quality of services because of the inability to pay (Guidelines: Section 6.3)	M M			
<b>Billing (42 CFR 59.5 (a) (9) Title X Guidelines: Section 6.3 )</b>				
(1) At the time of services, clients responsible for paying are given bills directly	M			
(a) Bills to clients show the total charges, as well as any allowable discounts	M			
(b) Where a third party is responsible, bills are submitted to that party	M			
(c) Third parties authorized or legally obligated to pay for clients at or below 100% FPL are properly billed	M			
(d) Third party bills show total charges without any discounts				
(e) Bills to third parties show total charges without applying any discount unless there is a contracted				

reimbursement rate that must be billed per the third party agreement				
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 <b>Title X Program Review Tool: FINANCIAL SECTION</b>				
<b>Criteria for Title X Compliance</b>		<b>C</b>	<b>NC</b>	<b>Comments/Documentation/Explanation</b>
(2) When reimbursement from Title XIX or Title XX of Social Security Act is available, a written agreement is required <i>(42 CFR 59.5 (a) (9))</i>	M			
<b><u>Collections</u></b> <i>(Title X Guidelines: Section 6.3)</i>				
(1) Reasonable efforts to collect charges without jeopardizing client confidentiality are made	M			
(2) A method for “aging” outstanding accounts has been established	M			
(3) There is no evidence that clients are pressured to make donations	M			
(a) Donations are not a prerequisite for provision of any service or supply	M			
(b) Billing requirements set out above are not waived because of client donations	M			
(4) Projects offering services not required by Title X should seek other funding for such services before applying Title X funds to those activities	S			



**Title X Program Review Tool:  
FINANCIAL SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
4. Procurement /Inventory Control/Property Management meet Title X and Federal grant requirements.				<i>Write/Type Comments in the space below</i>
a) Delegate agencies have written procurement policies and procedures for procurement of supplies, equipment and other services (45 CFR 74.44; 45 CFR 92.36)	M			
b) All procurement transactions conducted (including those for sub-recipient services) provide for practical, open and free competition (Competitive process is used for purchasing) (45 CFR 74.43; 45 CFR 92.36 (12) (C); 42 CFR 59.5)	M			
c) Delegate agencies maintain records that detail the history of a procurement (45 CFR 74.21 & 74.41; 45 CFR 92.20 & 92.36 (b) (9); Accepted Internal Control Procedures)	S			
d) Delegate has proper segregation between requisition, procuring, receiving and payment functions (45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures)	M			
e) Delegate have inventory system to control purchase, use, reordering of medications and supplies (45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures; State Pharmacy Regulations)	M			
f) Delegate has adequate safeguards for assuring that supplies purchased through the Federal Drug Pricing Program (340B) are provided only to clients served in the Title X project (Veterans Health Care Act of 1992)	M			

g) Delegate has established controls over access to medications and supplies (45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures)	M			
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 <b>Title X Program Review Tool: FINANCIAL SECTION</b>				
Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
5. Procurement/Inventory Control/Property Management meet Title X and Federal grant requirements				<i>Write/Type Comments in the space below</i>
h) Delegate periodically confirms inventory with actual inventory counts and provides credit debit adjustment to Title X charges to reflect actual costs (45 CFR 74.21; 45 CFR 92.20; Accepted Internal Control Procedures)	M			
i) Delegate evaluates contractor performance and documents if contractors have met the terms, conditions and specifications of the contract (45 CFR 74.47; 45 CFR 92.36)	M			
j) Delegate maintains a property management system (Fixed Assets) (45 CFR 74.34; 45 CFR 92.32)	M			
k) Property management system includes: asset description, ID number, acquisition date, current location and Federal share of the asset (45 CFR 74.34; 45 CFR 92.32)	M			
(1) Delegate performs a physical inventory of equipment at least once every 2 years (Records shall be investigated to determine the cause of any differences). (45 CFR 74.34; 45 CFR 92.32)	M			



**Title X Program Review Tool:**

**COMMUNITY PARTICIPATION, EDUCATION AND PROJECT PROMOTION SECTION**

**COMMUNITY PARTICIPATION, EDUCATION AND PROJECT PROMOTION:** The Delegate provides for the review and approval of educational and informational material used in the project and develops project promotional activities that inform the community of the objectives and the available services of the project. Delegate provides opportunities for community participation in the development, implementation and evaluation of the project consistent with Title X regulations.

Appropriate community education, information and participation activities include compliance with the criteria listed in this section. Program Review consultants may review the documents listed below to aid in assessing compliance:

1. Information and Education (I & E) Committee	<ul style="list-style-type: none"><li>▪ I &amp; E Committee Polices, Processes and/or Procedures</li><li>▪ I &amp; E Committee Review Forms and Committee Deliberations</li><li>▪ I &amp; E Committee Member selection process</li><li>▪ Current I &amp; E Committee membership</li><li>▪ Sample material approved by the I &amp; E Committee</li></ul>
2. Community Participation	<ul style="list-style-type: none"><li>▪ Delegate plan for community participation</li><li>▪ Advisory Committee participation and selection process</li><li>▪ Current Advisory Committee membership</li><li>▪ Minutes from Advisory Committee meetings</li></ul>
3. Community Education and Project Promotion	<ul style="list-style-type: none"><li>▪ Assessment of community needs</li><li>▪ Community education and outreach plans</li><li>▪ Evidence of community education activities, events, programs and outcomes</li></ul>

The Community Participation, Education and Project Promotion Section of the Program Review is based on the following Title X and other Federal grant requirements:

- Title X Legislation and Title X Implementing Regulations, 42 CFR Part 59
- Program Guidelines for Family Planning Project Grants for Family Planning Services, 2001



**Title X Program Review Tool:  
COMMUNITY PARTICIPATION, EDUCATION AND PROJECT PROMOTION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
<b>A. Informational and Educational (I &amp; E) Materials</b>				
1. I & E Committee operates in accordance with Title X requirements ( <i>Title X Statute Section 1006: 42 CFR 59.6; Title X Guidelines: Section 6.8</i> )				<i>Write/Type Comments in the space below</i>
a) Delegate MAY delegate the I & E operations for review and approval of materials to sub-recipients agencies. If so, (1) Oversight responsibility for the committee(s) rests with the Delegate	M			
b) Delegate has an I & E Committee with the following characteristics: (1) The Committee consists of 5-9 members	M			
(2) The members of the Committee broadly represent (in terms or demographic factors) the community for which the materials are intended	M			
c) I & E materials developed or made available under the Project are reviewed and approved by the committee prior to their distribution to assure materials are consistent with Title X requirements	M			
d) As part of the review and approval process, the I & E Committee does the following:	M			
(1) Establishes a written record of their determinations				
(2) Ensures all materials distributed: (a) Consider community standards and are appropriate for the community served	M			



**Title X Program Review Tool:  
COMMUNITY PARTICIPATION, EDUCATION AND PROJECT PROMOTION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
(b) Consider the education and cultural background of the recipient	M			
(c) Are factually accurate	M			
(i) Committee may delegate responsibility for the review of the factual, technical, and clinical accuracy to appropriate project staff	O			
<b>B. Community Participation</b>				
1. Delegate meets Title X requirements for community participation ( <i>42 CFR 59.5 (b) (10); Title X Guidelines: Section 6.9</i> )				<i>Write/Type Comments in the space below</i>
a) The Delegate's project plan includes a plan for community participation	M			
b) The Delegate has provided an opportunity for participation in the development, implementation, and evaluation of the project by persons broadly representative of all significant elements of the population to be served and by others in the community knowledgeable about community needs for family planning services	M			
c) I & E Committee may serve as the community participation function if it meets the above requirements	O			



**Title X Program Review Tool:  
COMMUNITY PARTICIPATION, EDUCATION AND PROJECT PROMOTION SECTION**

Criteria for Title X Compliance		C	NC	Comments/Documentation/Explanation
2. The Delegate provides community education programs consistent with Title X requirements (42 CFR 59.5 (b)(3); Title X Guidelines: Section 6.9)				<i>Write/Type Comments in the space below</i>
a) Each project has a community education program	M			
b) The community education program:				
(1) Is based on a needs assessment	S			
(2) Contains an implementation and evaluation strategy	S			
(3) Achieves community understanding of the project	M			
(4) Informs potential clients of the availability of services	S			
(5) Encourages continued participation of persons who might benefit from family planning services	M			
3. The Delegate effectively promotes their project (42 CFR 59.5 (b)(3); Title X Guidelines: Section 6.9)				<i>Write/Type Comments in the space below</i>
a) There is evidence that planned activities are implemented that:				
(1) Inform the community of the availability of services	M			
(2) Promote continued participation in the project by persons to whom family planning may be beneficial	M			
(3) Review and/or use a range of promotion strategies	M			
(4) Assess the availability of resources and materials	S			
(5) Assess/review promotional activities annually to assure they are responsive to changing needs in the community	S			