

Closeout Overview for Title X Clinics



Closing out a Title X clinic is a complex process that requires strong management, clear communication, comprehensive documentation, and compliance with fiscal requirements.

This overview is intended for CEOs and administrators (to provide their boards with information on what to expect); **project administrators** (to begin orienting themselves to the planning process); and **project staff** (to begin identifying tasks).

Closeout Management

The first step will be to establish a strong management structure—including administrative, clinical, and fiscal leaders—and clearly define roles and responsibilities. This will help ensure that all activities are well-coordinated, timely, and align with the expectations outlined in the project's notice of award.

The details of your plan will vary, depending on the closeout circumstances and staff involved. Reasons to engage in a closeout process include: end of a Title X grant, end of a subrecipient agreement, organization or site closure, or clinic move.

Consider when to:

- Engage your Project Officer for guidance related to Office of Population Affairs (OPA) or Grants and Acquisitions Management (GAM) requirements.
- Develop a closeout timeline that includes staff assignments.
- Write a comprehensive communications plan for clients, staff, partners, and media.
- Create a physical property plan.

Internal Communications

Timely and transparent communication with internal stakeholders, particularly staff and board members, will be critical during closeout. Internal procedures within an agency or clinic will dictate whether staff or board members are notified first of the decision to close.

When developing an approach to internal communications, involve agency leadership, supervisors, human resources representatives, and the board, if appropriate. Leadership should determine whether staff will be reassigned within the organization or if positions will be eliminated. This will likely be a tough transition; make sure that all messaging is compassionate, consistent, and compliant with legal standards.

Consider when to:

- Draft a board notification letter.
- Draft a staff notification letter.

External Communications

Once board members and staff have been notified, staff leading the closeout should develop an external communications plan. This plan should address all communications, including press releases and notifications, that must be sent to funders, referral providers, community partners, professional organizations, and licensure boards. To ensure all regulatory obligations are met and messaging is clear, involve the clinic director, compliance officer, communications or public relations staff, legal counsel, and pharmacy/program administrators in crafting these messages.

Consider when to:

- Make a list of external partners.
- Write communications materials, such as a press release and a partner notification letter.

Vendor Management

Another critical step will be to review and manage all existing vendor contracts with the aim of avoiding any financial or legal complications. Involve a finance team member, contract manager, administrative lead, and legal counsel, if available, to ensure that the clinic fulfills its obligations and concludes vendor relationships appropriately.

Consider when to:

- Develop or update a list of active vendor contracts.
- Circulate written notice of closing to all vendors, in accordance with the terms outlined in their agreements.

Client Communications

Clear, compassionate, and proactive communication with clients at closeout will help ensure continuity of care and to maintain trust in the organization. Involve communications staff, clinical leadership, front office or client services staff, and compliance or medical records personnel to ensure messaging is accurate, sensitive, and consistent across all platforms.

Consider when to:

- Compile a list of alternative health care providers.
- Draft a letter to notify clients of closure.
- Include messaging on the phone system, website, and social media.
- Develop clinic signage notifying clients of closure.
- Write a script for front desk staff, care coordinators, and patient navigators to follow when notifying clients about the closure.

Documentation and Records

Another important step will be the proper handling of documentation and records. Involve the clinic compliance officer, health information management and IT staff, administrative lead, and legal advisor to ensure compliance, protect client privacy, and support future record requests.

Consider how to implement a system that ensures accessible and auditable client medical records.

Fiscal

All financial activities must be properly reconciled and reported in accordance with regulatory and funder requirements. Involve finance and accounting personnel, grant managers, and administrative leads to ensure compliance, accuracy, and timely submission of all fiscal documentation, as well as compliant records retention.

Consider how to implement a system that ensures accessible and auditable financial records.