**Title X Subrecipient Fiscal Assessment and Onboarding Checklist**

**Purpose:** This checklist is designed to help grantees assess whether a subrecipient meets fiscal requirements in alignment 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 and to record their approval of required protocols and procedures.

**How to use:** Gather information to complete this assessment by conducting document reviews, interviewing subrecipient or clinical site staff, conducting site visits, 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 fiscal documents and processes necessary for Title X compliance, but it is not an exhaustive list of all items that a grantee may require. The grantee can add other items to this checklist or delete items as necessary.

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

**Step 3:** At the onset of the onboarding process, the grantee should review the subrecipient’s existing fiscal requirements and note any that meet Title X requirements as approved.

**Step 4:** Assign due dates for any fiscal requirements that the subrecipient will need to complete. Grantees may want to assign a certain number of tasks to be reviewed in monthly or quarterly batches to provide manageable goals. Incorporate outstanding activities into the Title X Subrecipient Onboarding Work Plans.

**Step 5:** Once all fiscal requirements have been approved, notify the subrecipient and grantee staff that participated in this task. Acknowledging this effort, recognize the team work involved, and celebrate the success!

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*[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’s 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.

| **DOCUMENTS AND EVIDENCE**  Subrecipients must have documentation and evidence, such as the items listed below, that supports and demonstrates compliance with Title X 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 requirements. 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** |
| --- | --- | --- | --- | --- |
| 1.3 Financial documentation demonstrates that Title X funds are not used for abortion services or referral for abortion as a method of family planning |  |  |  |  |
| 1.3 Financial documentation demonstrates separation between Title X and non-Title X activities |  |  |  |  |
| 1.4.6 Financial records align with Title X requirements |  |  |  |  |
| 1.5.1 Documentation that clients with income ≤ 100% FPL are not charged for services |  |  |  |  |
| 1.5.1 Financial screening and eligibility determination forms are in accordance with Title X requirements |  |  |  |  |
| 1.5.9 Client billing records demonstrate that confidentiality is maintained when billing and collecting payments |  |  |  |  |
| 1.5.2 Discount schedule aligns with Title X requirements |  |  |  |  |
| 1.5.2 Service site documentation demonstrates that discounts are appropriately applied |  |  |  |  |
| 1.5.3 Documentation demonstrates that fees are waived for individuals above 100% FPL in accordance with Title X requirements |  |  |  |  |
| 1.5.4 Documentation (such as a cost analysis) demonstrates that the schedule of fees is designed to recover the reasonable costs of providing services |  |  |  |  |
| 1.5.4 Financial records indicate that client income is assessed and charges are appropriate |  |  |  |  |
| 1.5.5 Documentation demonstrates that donations are voluntary |  |  |  |  |
| 1.5.6 Documentation of discount eligibility for minors demonstrates that charges for adolescents seeking confidential services are based solely on the adolescent’s resources |  |  |  |  |
| 1.5.7 Documentation demonstrates contracts with third-party payers |  |  |  |  |
| 1.5.7 Co-pay records indicate that clients do not pay more in copayments or additional fees than they would otherwise pay when the schedule of discounts is applied |  |  |  |  |
| 1.5.8 Title XIX/Title XX/Title XXI agreements are in place as appropriate |  |  |  |  |
| 1.6.5 Documentation indicates adherence to salary limitations as required by law |  |  |  |  |
| 3 Records indicate processing of third party billing in a manner that does not breach client confidentiality |  |  |  |  |
| Other: Processes exist for collecting grantee-specific fiscal reports sufficient to collect data for Title X federal reporting requirements and grantee fiscal monitoring |  |  |  |  |