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

**Purpose:** This checklist is designed to help grantees assess whether a subrecipient’s policies 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 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 policies necessary for compliance with Title X compliance, but it is not an exhaustive list of all policies a grantee may require. The grantee can add other policies to this checklist—for example, those related to grantee-specific FPAR reporting—or delete items as necessary.

**Step 2:** Save the modified checklist and use it throughout the onboarding process to document review of subrecipient policies and procedures. 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 policies and note any that meet Title X requirements as approved.

**Step 4**. Assign due dates for any policies that the subrecipient will need to develop. Grantees may want to assign a certain number of policies to be reviewed in monthly or quarterly batches to provide manageable goals.

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

**Step 6.** Once all policies 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!

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

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

*[Insert* ***Subrecipient 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). To ensure all policies listed in the PRT are addressed, they are listed individually with their corresponding PRT number. However, many of the topics can be combined and do not necessarily need to be addressed in separate policies.

| **TITLE X POLICIES**  Subrecipients are required to have the written policies listed below in accordance with Title X program requirements. Subrecipients can use the [Title X Policy Templates](https://www.fpntc.org/resources/title-x-policy-templates) as the foundation for their policies.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 Management and Administration |  |  |  |  |
| 1.1 Voluntary participation |  |  |  |  |
| 1.2 Prohibition of abortion & referral for abortion |  |  |  |  |
| 1.3 Physical separation of Title X and non-Title X activities |  |  |  |  |
| 1.4.3 Authorized purchases |  |  |  |  |
| 1.4.5 Subrecipient inclusion in grantee policy establishment |  |  |  |  |
| 1.4.6 Financial management system |  |  |  |  |
| 1.5.1 Federal poverty level guidance, third party billing, and income verification |  |  |  |  |
| 1.5.2 Discount schedules |  |  |  |  |
| 1.5.3 Fee waiver |  |  |  |  |
| 1.5.4 Reasonable costs/fee schedules |  |  |  |  |
| 1.5.5 Voluntary donations |  |  |  |  |
| 1.5.6 Discount eligibility for minors |  |  |  |  |
| 1.5.7 Third party payments |  |  |  |  |
| 1.5.9 Confidential collections |  |  |  |  |
| 1.6.1 Personnel policies |  |  |  |  |
| 1.6.2 Cultural competency |  |  |  |  |
| Training and Technical Assistance |  |  |  |  |
| 1.7 Staff training and project technical assistance |  |  |  |  |
| Project Services and Clients |  |  |  |  |
| 2.2 Client dignity |  |  |  |  |
| 2.3 Non-discriminatory services |  |  |  |  |
| 2.4 Availability of social services |  |  |  |  |
| 2.5 Availability and use of referrals |  |  |  |  |
| 2.6 Clinical protocols and standards of care |  |  |  |  |
| 2.7 Provision of family planning and related services |  |  |  |  |
| 2.8 Range of family planning methods |  |  |  |  |
| 2.9 Durational residency |  |  |  |  |
| 2.10 Pregnancy testing and diagnosis |  |  |  |  |
| 2.11 Compliance with legislative mandates |  |  |  |  |
| Confidentiality |  |  |  |  |
| 3 Confidentiality |  |  |  |  |
| Community Participation, Education, and Project Promotion |  |  |  |  |
| 4.1 Collaborative planning and community engagement |  |  |  |  |
| 4.2 Community awareness and education |  |  |  |  |
| Information and Education Materials Approval |  |  |  |  |
| 5.1 Materials review and approval process |  |  |  |  |
| 5.3 Advisory committee membership |  |  |  |  |
| 5.4 Grantee oversight for materials review |  |  |  |  |
| 5.5 Advisory committee responsibility for materials review |  |  |  |  |
| 5.6 Advisory committee requirements |  |  |  |  |
| Additional Administrative Requirements |  |  |  |  |
| 6.1 Facilities and accessibility of services |  |  |  |  |
| 6.2 Human subjects clearance (research) |  |  |  |  |