# Title X Subrecipient Fiscal Assessment and Onboarding Checklist

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

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

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

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

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

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

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

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

## Title X Subrecipient Fiscal Assessment and Onboarding Checklist

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

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

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

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

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

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

| **REQUIRED DOCUMENTS**  Subrecipients must have documentation and evidence, such as the items listed below, that support and demonstrate compliance with Title X Program requirements. These documents ensure that what is contained in written policy or instructions is actually being carried out and substantiate that the project is operating in accordance with Title X Program 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** |
| --- | --- | --- | --- | --- |
| Financial Accountability | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: Schedule of discounts |  |  |  |  |
| 1, 3: Fee schedule |  |  |  |  |
| 1: Client documentation of income form |  |  |  |  |
| 9: If family planning services are provided by contract or by other similar arrangements with actual providers of services, they are provided in accordance with a plan that establishes rates and method of payment for medical care. |  |  |  |  |
| Subrecipient Monitoring and Engagement | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 5: Required financial and performance reports are reviewed and acceptable (monthly or quarterly financial reports). |  |  |  |  |
| 7: Audits are completed (as needed, per 45 CFR  part 75). |  |  |  |  |
| Prohibition of Abortion | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 4: Documentation is present demonstrating distinct accounting for Title X and non-Title X activities. |  |  |  |  |

| **AGENCY PROCESSES**  Subrecipients must implement processes, such as those listed below, to operationalize Title X Program requirements. | **DUE  DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Project Administration | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 9: Third party billing is processed in a manner that does not breach client confidentiality. |  |  |  |  |
| 13: There is 340B Program participation. |  |  |  |  |
| Financial Accountability | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: No charge is made for services provided to any clients from a low-income family. |  |  |  |  |
| 1, 7: Third parties that are authorized or under legal obligation to pay charges are billed. |  |  |  |  |
| 1: A fee waiver process is in place for clients with incomes greater than 100% of the federal poverty level (FPL) and who cannot afford services, for good cause. |  |  |  |  |
| 2: Minors seeking confidential billing are considered for their own resources. |  |  |  |  |
| 3: Method for determining fees is designed to recover the reasonable cost of providing services. |  |  |  |  |
| 4: Family income is assessed before determining whether copayments or additional fees are charged. |  |  |  |  |
| 5: Clients whose family income is at or below 250% of the FPL do not pay more (in copayments or additional fees) than what they would otherwise pay when the schedule of discounts is applied. |  |  |  |  |
| 6: Reasonable measures are taken to verify  client income. |  |  |  |  |
| 8: All services purchased for project participants are authorized by the project director or a designee on the project staff. |  |  |  |  |
| 10: The agency complies with all terms and conditions outlined in the grant award. |  |  |  |  |
| 13: Project income is used to finance the non-grantee share of the project’s scope. |  |  |  |  |
| 14: Title X funds are not expended for any activity that promotes public support or opposition to any legislative proposal or candidate for public office. |  |  |  |  |
| Subrecipient Monitoring and Engagement | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 11: Opportunity for maximum participation by existing or potential subrecipients is included in the ongoing policy decision making of the project. |  |  |  |  |
| Prohibition of Abortion | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 4: Non-Title X activities are separate and distinct from Title X project activities. |  |  |  |  |

| **CHART DOCUMENTATION**  Subrecipients must ensure that chart documentation captures the following information. | **DUE  DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Project Administration | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 9: Clients requesting confidentiality in billing are processed in a manner that does not breach their confidentiality. |  |  |  |  |
| Financial Accountability | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 1: No charges are made for services provided to any clients from a low-income family. |  |  |  |  |
| 1, 7: Third parties that are authorized or are under legal obligation to pay charges are billed. |  |  |  |  |
| 1: Client documentation of income is maintained in the medical record. |  |  |  |  |
| 2: Minors seeking confidential billing are considered for their own resources. |  |  |  |  |
| 3: Fees charged to clients more than 100% of the FPL are based on a sliding fee schedule. |  |  |  |  |
| 4: Family income is assessed before determining whether copayments or additional fees are charged. |  |  |  |  |
| 5: Clients whose family income is at or below 250% of the FPL do not pay more (in copayments or additional fees) than what they would otherwise pay when the schedule of discounts is applied. |  |  |  |  |

| **SUBCONTRACTS**  Subrecipients wishing to subcontract any responsibilities or services must maintain a written agreement consistent with Title X Program requirements and approved by the grantee. The  [Title X Program Review Tool](https://www.fpntc.org/resources/title-x-program-review-tool) contains additional information. | **DUE  DATE** | **DATE APPROVED** | **REVIEWER INITIALS** | **COMMENTS** |
| --- | --- | --- | --- | --- |
| Subrecipient Monitoring and Engagement | ­DUE DATE | DATE APPROVED | REVIEWER INITIALS | COMMENTS |
| 2: Every subcontract is clearly identified as a subaward to the subrecipient and includes all required information at the time of the subcontract signing (see Handbook for the complete list of required information). |  |  |  |  |