MARYLAND STATE FAMILY PLANNING TITLE X PROGRAM REVIEW TOOL

Date		
Clinic/Delegate Agency	 	
Clinic Contact		
Reviewer	 	

Introduction:

In 2014, the Office of Population Affairs (OPA) released updated Title X family planning program guidelines. These Guidelines consist of two parts:

- 1. The Title X Program Requirements, which lays out the Federal statutory and regulatory requirements of the Title X program.
- 2. Providing Quality Family Planning Services: Recommendations of CDC and the U.S. Office of Population Affairs (QFP), which provides clinical recommendations for how to provide family planning services in a manner that is consistent with the best available scientific evidence.

In 2015, the Maryland State Family Planning Program released the updated Maryland Family Planning and Reproductive Health Program Administrative Guidelines.

This tool describes strategies that delegates may use to operationalize applicable Title X statutory and regulatory requirements and lays out the minimum expectations for compliance. The document also illustrates how a delegate can implement QFP in a way that ensures quality care is provided throughout the Title X project.

There are two types of assessments that will be generated by the OFCHS/delegate upon completion of the program review tool:

1.) Title X Program Requirements Assessment: Met/Not Met/NA

This assessment relates to the delegate's compliance with the statute and regulations. For these requirements, the delegate will receive an assessment of compliance and will receive a rating of "met"," not met", or "N/A" (not applicable). The evidence that the minimum criteria have been met will be determined based on both delegate records and observation at delegate service sites as part of the monitoring process. Delegates will be evaluated using the list of evidence items in the implementation strategy column. These are minimum elements that the delegate should have on site or otherwise readily available as evidence that the project meets requirements. Evidence may include but is not limited to, policies, procedures, protocols, documentation of training, or any other form of documentation that substantiates that the project is operating in accordance with the Title X Program Requirements.

2.) QFP Quality Assessment: Highly Developed, Developed, Being Developed or Needs Development

This assessment reflects the extent to which the delegate has implemented key aspects of QFP within each item. Sections within the document identify where there is a relationship between the Program Requirements and QFP. Delegates will be assessed using the list of items in the implementation column. Quality assessments will be determined based on the number of items demonstrated by the delegate. These examples do not represent an exhaustive list and delegates may propose additional items. The color-coded assessment will serve as a tool for the OFCHS/delegate to recognize achievement in the individual sections assessed as well as identify areas in need of improvement and/or technical assistance.

Quality Assessment				
Highly Developed	All Quality Indicators Met and Evidence of Best Practices or Highly Innovative Approaches			
Fully Developed	All Quality Indicators Met			
Partially Developed	Half or more Quality Indicators Met			
Being Developed	One or More but less than half of Quality Indicators Met			
Needs Development	No Quality Indicators Met			

Definitions:

TERM	DEFINITION
Title X Program Requirement	Requirements applicable to the Title X program, as set out in the Title X statute and
	implementing regulations (42 CFR part 59, subpart A), and in other applicable
	Federal statutes, regulations and policies.

Implementation Strategy	Implementation strategy includes the delegate's mechanism for ensuring compliance with Title X requirements. This includes providing evidence on site or otherwise readily available to document and demonstrate that the project meets requirements. The examples listed in the program review tool do not represent an exhaustive list. Evidence may include but is not limited to, policies, procedures, protocols, documentation of training, or any other form of documentation that substantiates that the project is operating in accordance with the Title X Program Requirements and Recommendations for Providing Quality Family Planning Services (QFP).
Family Planning Services	Services that are directly related to preventing unintended pregnancies as well as achieving planned pregnancies that result in healthy birth outcomes. This includes contraceptive services, pregnancy testing and counseling, services to assist with achieving pregnancy, basic infertility services, STD services, and other preconception health services. These services should be offered to both women and men in accordance with QFP. Title X providers should be trained and equipped to offer these services.
Related Preventive Health Services	Services that are considered to be beneficial to reproductive health, are closely linked to family planning services, and are appropriate to deliver in the context of a family planning visit but do not contribute directly to achieving or preventing pregnancy (e.g., breast and cervical cancer screening). Title X providers should be trained and equipped to offer these services.
Other Preventive Health Services	These include other preventive health services for women and men that are not listed above. Screening for lipid disorders, skin cancer, colorectal cancer, or osteoporosis are examples. Although important in the context of primary care, these have no direct link to family planning services. Clients should be provided referrals for these as well as other primary care services, but they should not be considered a Title X service.

Maryland State Family Planning Title X Program Review Tool

8. Project Management and Administration

Title X Program Requirement	Implementation Strategy	Assessment		
8.1 Voluntary Participation	Delegates should institutionalize administrative			
Family planning services are to be	procedures (i.e., staff training, clinical protocols, and	1. Delegate P	olicies	
provided solely on a voluntary	consent forms) to ensure clients receive services on a	Met	Not Met	N/A
basis (Sections 1001 and 1007,	voluntary basis.			
PHS Act; 42 CFR 59.5 (a)(2)).		Comments:		
	Evidence that this requirement has been met includes:			
Clients cannot be coerced to accept	1. Delegate has written policies and procedures			
services or to use or not use any	that specify services are to be provided on a	Delegate Ove	•	
particular method of family	voluntary basis.	2. Staff Train		
planning (42 CFR 59.5 (a)(2)).	2. Documentation at service sites demonstrates	Met	Not Met	N/A
	(e.g., staff circulars, training curriculum and			
	records) staff has been informed at least once	Comments:		
	during their period of employment that services			
	must be provided on a voluntary basis.			
	3. Administrative policies used by service sites	3. Service Sit		1
	include a written statement that clients may not	Met	Not Met	N/A
	be coerced to use contraception, or to use any			
	particular method of contraception or service.	Comments:		
	4. General consent forms at service sites inform			
	clients that services are provided on a voluntary	4 C		
	basis.	4. Consent Fo		NT/A
	4a. Record Review at service sites demonstrate	Met	Not Met	N/A
	that each client has signed a general consent		Ш	
	form and has received written or other	Comments:		
	assurance that services are voluntary.			
LINK TO QFP:		4a.Record Re	view	
	A core premise of <i>Recommendations for Providing</i>	Met	Not Met	N/A
	Quality Family Planning Services is that quality			

	services are client-centered, which includes providing services on a voluntary basis. The key principles of providing quality, client-centered counseling include: 1) establish and maintain rapport with the client, 2) assess the client's needs and personalize discussions accordingly, 3) work with the client interactively to establish a plan, 4) provide information that can be understood and retained by the client, and 5) confirm client understanding. These principles are useful when developing counseling protocols that ensure voluntary participation. (See Appendix C for additional detail). Quality Assessment: 1. Observation of counseling process, including I&E material provided, at service sites demonstrates that the five principles of quality counseling are utilized when providing family planning services.	QFP elements documents by reviewer All met + All met Half or More met One or More but less than half None	Quality Rating Highly Developed Fully Developed Partially Developed Being Developed Needs Development
A client's acceptance of family planning services must not be a prerequisite to eligibility for, or receipt of, any other services, assistance from, or participation in any other program that is offered by the grantee or sub-recipient (Section 1007, PHS Act; 42 CFR 59.5 (a)(2)).	Delegate should institutionalize administrative procedures (e.g., staff training, clinical protocols, and consent forms) to ensure clients' receipt of family planning services is not used as a prerequisite to receipt of other services from the service site. Evidence that this requirement has been met includes: 1. The delegate has a written policy that prohibits their service sites, and any sub-vendor service sites from making the acceptance of family	1. Delegate Polements:	licies Not Met N/A

			_	
	planning services a prerequisite to the receipt of	2. Staff Train		
	any other services.	Met	Not Met	N/A
2.	Documentation (e.g., staff circulars, training			
	curriculum) indicates staff has been informed at	Comments:		
	least once during their period of employment			
	that a client's receipt of family planning			
	services may not be used as a prerequisite to	3. Service Sit	e Policies	
	receipt of any other services offered by the	Met	Not Met	N/A
	service site.			
3.	Administrative policies at service sites include	Comments:		'
	a written statement that receipt of family			
	planning services is not a prerequisite to receipt			
	of any other services offered by the service site.	4. Consent Fo	orms	
4	General consent forms state that receipt of	Met	Not Met	N/A
••	family planning services is not a prerequisite to			
	receipt of any other services offered by the	Comments:		-
	service site.			
5.	Medical chart review demonstrates that each			
٦.	client has signed a general consent form stating	5. Chart Revi	ew	
	receipt of family planning services is not a	Met	Not Met	N/A
	prerequisite to receipt of any other services		П	
	offered.	Comments:		
	offered.	Commonts.		

Personnel working within the	Evidence that this requirement has been met includes:			
family planning project must be	1. Delegate has written policies and procedures	1. Delegate P		
informed that they may be subject	that require that all staff of the delegate, service	Met	Not Met	N/A
to prosecution if they coerce or try	sites, and sub-vendors is informed that they may			
to coerce any person to undergo an	be subject to prosecution if they coerce or try to	Comments:		
abortion or sterilization procedure	coerce any person to undergo an abortion or			
(Section 205, Public Law 94-63, as	sterilization procedure.			
set out in 42 CFR 59.5(a)(2)	2. Documentation at the delegate level	2. Delegate I	Documentation	
footnote 1).	demonstrates that staff has been informed at	Met	Not Met	N/A
	least once during their period of employment			
	that they are subject to this requirement.	Comments:		
	3. Documentation at service sites and sub-vendors			
	(e.g., staff circulars, training records)			
	demonstrates that staff has been informed at	3. Oversight	Documentation	
	least once during their period of employment	Met	Not Met	N/A
	that they are subject to this requirement.			
		Comments:		
8.2 Prohibition of Abortion	Systems must be in place to assure adequate separation	Assessment		
Title V exentence and sub recipients		4 4		
Title X grantees and sub-recipients	of any non-Title X activities from the Title X project.	1. Delegate	Policies	
must be in full compliance with	of any non-Title X activities from the Title X project.	1. Delegate Met	Policies Not Met	N/A
	of any non-Title X activities from the Title X project. Delegate has documented processes to ensure that they			N/A
must be in full compliance with		Met	Not Met	
must be in full compliance with Section 1008 of the Title X statute	Delegate has documented processes to ensure that they	Met	Not Met	
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section 1008. Delegates should include language in sub-vendor	Met	Not Met	
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section	Met Comments:	Not Met	
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section 1008. Delegates should include language in sub-vendor contracts addressing this requirement.	Met Comments:	Not Met	
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section 1008. Delegates should include language in sub-vendor contracts addressing this requirement. Evidence that this requirement has been met includes:	Met Comments:	Not Met	
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section 1008. Delegates should include language in sub-vendor contracts addressing this requirement. Evidence that this requirement has been met includes: 1. Delegate has written policies and procedures that	Met Comments: 2. Delegate (if applicabl	Not Met Sub-vendor core)	ntracts
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section 1008. Delegates should include language in sub-vendor contracts addressing this requirement. Evidence that this requirement has been met includes: 1. Delegate has written policies and procedures that prohibit service sites and sub-vendors from	Met Comments: 2. Delegate (if applicable) Met	Sub-vendor core)	ntracts N/A
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section 1008. Delegates should include language in sub-vendor contracts addressing this requirement. Evidence that this requirement has been met includes: 1. Delegate has written policies and procedures that prohibit service sites and sub-vendors from providing abortion as part of the Title X project.	Met Comments: 2. Delegate (if applicable) Met	Sub-vendor core)	ntracts N/A
must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of	Delegate has documented processes to ensure that they and their sub-vendors are in compliance with Section 1008. Delegates should include language in sub-vendor contracts addressing this requirement. Evidence that this requirement has been met includes: 1. Delegate has written policies and procedures that prohibit service sites and sub-vendors from	Met Comments: 2. Delegate (if applicable) Met	Sub-vendor core)	ntracts N/A

		3. Oversight		
3.	Financial documentation at service sites	Met	Not Met	N/A
	demonstrates that Title X funds are not being used			
	for abortion services and adequate separation	Comments:		•
	exists between Title X and non-Title X activities.			

8.3.2	If a sub-recipient wishes to subcontract any of its responsibilities or services, a written agreement that is consistent with Title X	Evidence that this requirement has been met includes: 1. Delegate has a signed agreement with any subvendor who subcontracts for responsibilities or services, requiring the sub-vendor to include compliance with Title X requirements in their subcontracts.	1.Delegate D agreements Met Comments:	ocumentation-s Not Met	signed N/A
	must be maintained by the	 Documentation shows the Grantee has approved Delegates' sub-vendor subcontracts. Review of Delegate and sub-vendor monitoring reports demonstrates that the delegate ensures 	2.Delegate D approvals	ocumentation-	N/A
		that the sub-vendor is monitoring the entity for compliance with Title X requirements.	Met Comments:		N/A
			3. Delegate N		37/4
			Met	Not Met	N/A
			Comments:		
8.3.3	The grantee must ensure that	Evidence that this requirement has been met includes:	1. Delegate P	olicies	
	all services purchased for	1. Policies clearly indicate the approval process for	Met	Not Met	N/A
	project participants will be	any services that are purchased for participants.			
	authorized by the project director or his designee on	2. Documentation of purchases demonstrates that the delegate's established policies and procedures	Comments:		
	the project staff (42 CFR 59.5(b)(7)).	are followed.	2. Review of	Purchases	
	37.3(0)(7)).		Met	Not Met	N/A
			Comments:		

			ı		
8.3.4	The grantee must ensure	Evidence that this requirement has been met includes:			
	that services provided	1. Delegate contracts clearly indicate the schedule	1. Delegate co	ontracts	
	through a contract or other	of rates and payment procedures for services.	Met	Not Met	N/A
	similar arrangement are paid	2. Delegate can substantiate that the rates are			
	for under agreements that	reasonable and necessary. This includes	Comments:		
	include a schedule of rates	demonstrating the process and/or rationale used			
	and payment procedures	to determine payments, examples of financial			
	maintained by the grantee.	records, applicable internal controls.	2. Process for	determining ra	ates
	The grantee must be		Met	Not Met	N/A
	prepared to substantiate that				
	these rates are reasonable		Comments:		
	and necessary (42 CFR				
	59.5(b)(9)).				
8.3.5	Sub-recipient agencies must	Evidence that this requirement has been met includes:	1. Delegate P	olicies	
	be given an opportunity to	1. Delegate policies identify the mechanism(s) used	Met	Not Met	N/A
	participate in the	to be involved and involve sub-vendor agencies			
	establishment of ongoing	in the development of policies and guidelines.	Comments:		
	grantee policies and	2. Documentation exists and may include meeting			
	guidelines (42 CFR 59.5	minutes, conference calls, and webinars that			
	(a)(10)).	demonstrates that delegates and sub-vendors	2. Documenta	ition	
		participate in this process as indicated in the	Met	Not Met	N/A
		delegate policy.			
			Comments:		

8.3.6	The grantee and each subrecipient must maintain a financial management system that meets Federal standards, as applicable, as well as any other requirements imposed by the Notice of Award, and which complies with Federal standards that will support effective control and accountability of funds. as required (45 CFR parts 74.20 and 92.20).	 Evidence that this requirement has been met includes: Delegate financial policies and procedures can be referenced back to federal regulations as applicable. Delegate financial records and oversight documentation demonstrates that the financial management practices within all project sites are aligned with Title X and other applicable regulations and grants requirements. 	1. Delegate P Met Comments: 2. Documenta Met Comments:	olicies Not Met Intion-Oversight Not Met Intion-Oversight	N/A N/A
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mid :	vn n '					
	X Program Requirement	г 1	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4			
	Charges, Billing, and		nce that this requirement has been met includes:	1.51 . 5	1	
Colle	ctions	1.	Delegate has policies and procedures assuring	1. Delegate P		127/1
			that clients whose documented income is at or	Met	Not Met	N/A
8.4.1	Clients whose documented		below 100% FPL are not charged for services and			
	income is at or below 100%		that third party payers are billed.	Comments:		
	of the Federal Poverty Level					
	(FPL) must not be charged,	2.	Financial documentation at the service site		Documentation-	-
	although projects must bill		indicates clients whose documented income is at	charges		
	all third parties authorized		or below 100% FPL are not charged for services.	Met	Not Met	N/A
	or legally obligated to pay					
	for services (Section			Comments:		
	1006(c)(2), PHS Act; 42	3.	Financial documentation at the service site			
	CFR $59.5(a)(7)$).		indicates that if a third party is authorized or			
			legally obligated to pay for services, the project		Documentation-	- Third
	Although not required to do		has billed accordingly.	Party Billing		
	so, grantees that have lawful	4.	Service sites follow a written policy and	Met	Not Met	N/A
	access to other valid means		procedure for verifying client income that is			
	of income verification		aligned with Title X requirements.	Comments:		
	because of the client's	5.	Service site policy and procedures for verifying			
	participation in another		client income does not present a barrier to receipt	Ŭ	olicies for Veri	fying
	program may use those data		of services.	Income		1 1
	rather than re-verify income			Met	Not Met	N/A
	or rely solely on the client's					
	self-report.			Comments:		
				5 D 1		
					olicy and Proce	
				Met	Not Met	N/A
				Comments:		

8.4.2	A schedule of discounts, based on ability to pay, is required for individuals with family incomes between 101% and 250% of the Federal Poverty Level (FPL) (42 CFR 59.5(a)(8)).	Evidence that this requirement has been met includes: 1. Delegate has policies and procedures requiring that a schedule of discounts be developed for services provided in the project and updated periodically to be in line with the FPL. 2. Service site documentation indicates client income is assessed and discounts are appropriately applied to the cost of services.	Met Comments:	Not Met ation at Service Not Met	N/A
8.4.3	Fees must be waived for individuals with family incomes above 100% of the FPL who, as determined by the service site project director, are unable, for good cause, to pay for family planning services (42 CFR 59.2).	Evidence that this requirement has been met includes: 1. Delegate has policies and procedures that have a process to refer clients (or financial records) to the service site director for review and consideration of waiver of charges. 2. Documentation at the service site demonstrates a determination is made by the service site director, is documented and the client is informed of the determination.	Met Comments:	Policies and Pro- Not Met ation at Service Not Met	N/A
8.4.4.	For persons from families whose income exceeds	Evidence that this requirement has been met includes:	1. Delegate P	olicies and Pro	cedures

	250% of the FPL, charges must be made in accordance with a schedule of fees designed to recover the reasonable cost of providing	 Delegate has documented policies and procedures requiring service sites and sub-vendors to have a sound rationale and process for determining the cost of services. 	Met Comments:	Not Met	N/A
	services. (42 CFR 59.5(a)(8)).	 Delegate financial records indicate client income is assessed and that charges are applied appropriately to recover the cost of services. 	2. Documents Met Comments:	ation at Service Not Met	Site N/A
8.4.5	Eligibility for discounts for unemancipated minors who receive confidential services must be based on the income of the minor (42 CFR 59.2).	Evidence that this requirement has been met includes: 1. Delegate policies and require service sites to have a process for determining whether a minor is seeking confidential services and stipulates that charges to adolescents seeking confidential services will be based solely on the adolescent's income.	1. Delegate P Confidentiali Met Comments:	olicies-Minor ty Not Met	N/A
		Client records indicate appropriate implementation of policy.	2. Delegate Comments:	Oversight- Not Met	N/A

			1		
8.4.6	C	Evidence that this requirement has been met includes:			
	obligation or authorization	1. Delegate policies and procedures require that all	1. Delegate P	olicies and Pro	cedures
	for third party	project sites bill insurance in accordance with	Met	Not Met	N/A
	reimbursement, including	Title X regulations.			
	public or private sources, all		Comments:		•
	reasonable efforts must be				
	made to obtain third party	2. The delegate can demonstrate that it (and/or its			
	payment without the	sub-vendors) has contracts with insurance	2. Contracts	with 3 rd Parties	
	application of any discounts	providers, including public and private sources.	Met	Not Met	N/A
	(42 CFR 59.5(a)(9)).				
		3. Financial records indicate that clients with family	Comments:	ı	l.
	Family income should be	incomes between 101%-250% FPL do not pay			
	assessed before determining	more in copayments or additional fees than they			
	whether copayments or	would otherwise pay when the schedule of	3. Charges ar	d Collection R	ecords
	additional fees are charged.	discounts is applied.	at Service Sit	e	
	With regard to insured		Met	Not Met	N/A
	clients, clients whose family				
	income is at or below 250%		Comments:	1	
	FPL should not pay more (in				
	copayments or additional				
	fees) than what they would				
	otherwise pay when the				
	schedule of discounts is				
1	believed of dibeodiffe in				

8.4.7	Where reimbursement is	Evide	nce that this requirement has been met includes:			
0.4.7	available from Title XIX or		Grantee maintains written agreements and	1. Delegate P	olicies and	
	Title XX of the Social	1.	ensures they are kept current, as appropriate.	Agreements	officies and	
	Security Act, a written		ensures they are kept current, as appropriate.	Met	Not Met	N/A
	agreement with the Title			Niet		IN/A
	•	2	Decommendation in diseases that the anames		Ш	
	XIX or the Title XX state	2.	Documentation indicates that the grantee	Comments:		
	agency at either the grantee		maintains oversight of its delegate's agreements			
	level or sub-recipient agency		with Title XIX and/or Title XX.			
	is required (42 CFR			2. Delegate C		/-
	59.5(a)(9)]			Met	Not Met	N/A
				Comments:		
8.4.8	Reasonable efforts to collect	Evide	nce that this requirement has been met includes:			
	charges without jeopardizing	1.	Delegate has policies addressing collection by	1. Delegate P	olicies	
	client confidentiality must		service sites that include safeguards that protect	Met	Not Met	N/A
	be made.		client confidentiality, particularly in cases where			
			sending an explanation of benefits could breach	Comments:		
			client confidentiality.			
			•			
		2.	Documentation demonstrates that clients'	2. Documenta	ation at Service	Site
			services remain confidential when billing and	Met	Not Met	N/A
			collecting payments.			
				Comments:		-
	client confidentiality must		service sites that include safeguards that protect client confidentiality, particularly in cases where sending an explanation of benefits could breach client confidentiality. Documentation demonstrates that clients' services remain confidential when billing and	Met Comments: 2. Documents Met	Not Met Interpretation at Service Not Met	Site N/A

Met

Comments:

Met

Comments:

Not Met

Unmet

1. Delegate Policies and Procedures

N/A

N/A

8.4.9	Voluntary donations from	Evide	nce that this requirement has been met includes:			
	clients are permissible;	1.	Delegate policies and procedures indicate if the	1. Delegate P	olicies and Pro	cedures
	however, clients must not be		project service sites may request and/or accept	Met	Not Met	N/A
	pressured to make		donations.			
	donations, and donations			Comments:		•
	must not be a prerequisite to	2.	Onsite documentation and observation			
	the provision of services or		demonstrates that clients are not pressured to			
	supplies.		make donations and that donations are not a	2. Documenta	ation at Service	Site
			prerequisite to the provision of services or	Met	Not Met	N/A
			supplies. Observation may include signage,			
			financial counseling scripts, or other evidence.	Comments:		
Title 2	X Program Requirement		mentation Strategy	Assessment		
	X Program Requirement roject Personnel		mentation Strategy nce that this requirement has been met includes:	Assessment		
					olicies and Pro	cedures
8.5 P	roject Personnel		nce that this requirement has been met includes:		olicies and Pro	cedures N/A
8.5 P	roject Personnel Grantees and sub-recipients		nce that this requirement has been met includes: Delegate has written policies and procedures in	1. Delegate P		
8.5 P	roject Personnel Grantees and sub-recipients are obligated to establish		Delegate has written policies and procedures in place that provide evidence that there is no	1. Delegate P	Not Met	N/A
8.5 P	roject Personnel Grantees and sub-recipients are obligated to establish and maintain personnel		Delegate has written policies and procedures in place that provide evidence that there is no discrimination in personnel administration at its	1. Delegate P	Not Met	N/A
8.5 P	roject Personnel Grantees and sub-recipients are obligated to establish and maintain personnel policies that comply with		Delegate has written policies and procedures in place that provide evidence that there is no discrimination in personnel administration at its organizations and within its sub-vendor network.	1. Delegate P	Not Met	N/A
8.5 P	roject Personnel Grantees and sub-recipients are obligated to establish and maintain personnel policies that comply with applicable Federal and State		Delegate has written policies and procedures in place that provide evidence that there is no discrimination in personnel administration at its organizations and within its sub-vendor network. These policies should include, but are not to be	1. Delegate P	Not Met	N/A

2. There is evidence that the delegate monitors sub-

vendors to ensure compliance with this

Evidence that this requirement has been met includes:

1. Written delegate policies and procedures that

address how the project operationalizes cultural

requirement.

competency.

Rehabilitation Act of 1973,

Disabilities Act, and the

annual appropriations

language.

8.5.2 Project staff should be

Title I of the Americans with

broadly representative of all

significant elements of the

population to be served by

the project, and should be

	sensitive to, and able to deal effectively with, the cultural and other characteristics of the client population (42 CFR 59.5 (b)(10)).	 Documentation at service sites includes records of cultural competence training, in-services, clien satisfaction surveys. 	2. Documentation at Service Site Satisfactory Not Met N/A Comments:
8.5.3 Chang	Projects must be administered by a qualified project director. ge in Status, including Absence of Principle Investigator/Project Director and Other Key Personnel requires pre-approval by the Office of Grants Management. For more information, see HHS Grants	Evidence that this requirement has been met includes: 1. Documentation that indicates any changes in project director have been submitted to the Office of Family and Community Health Services.	1. OFCHS Documentation (if applicable) Met Not Met N/A Comments:
8.5.4	Policy Statement, 2007 Section II-54. Projects must provide that family planning medical services will be performed under the direction of a physician with special training or experience in family planning (42 CFR 59.5 (b)(6)).	 Evidence that this requirement has been met includes: Delegate organization provides written evidence that the medical/clinical services operates under the direction of a physician There is some evidence (e.g. medical advisory committee, board, and staff meetings) indicating involvement of the Medical Director in program operations. Curriculum vitae of the Medical Director indicates special training or experience in family planning. 	1. Delegate Organization Charts Met Not Met N/A Comments: 2. Documentation-MD Oversight Met Not Met N/A Comments:

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		4. Clinic protocols for the entire project are			
		approved by the Medical Director.	3. CV of Med	lical Director	
		•	Met	Not Met	N/A
			Comments:		1
			4. Protocols a Director	pproved by Mo	edical
			Met	Not Met	N/A
			Comments:		
8.5.5	Appropriate salary limits	Evidence that this requirement has been met includes:			1
	will apply as required by	1. Documentation such as budgets and payroll	1. Documenta	ation	
	law.	records that indicate that the delegate is	Met	Not Met	N/A
		complying with required salary limits as			
		documented in the most current family planning	Comments:		•
		services Funding Opportunity Announcement			
		(FOA).			

Title 2	X Program Requirement	Implementation Strategy	Assessment
8.6 S Techi	taff Training and Project nical Assistance Projects must provide for the orientation and inservice training of all project personnel, including the staff of sub-recipient agencies and service sites (42 CFR 59.5(b)(4)).	Evidence that this requirement has been met includes: 1. Delegate records demonstrate the assessment(s) of staff training needs and a training plan that addresses key requirements of the Title X program and priority areas. 2. Delegate maintains written records of orientation, in-service and other training attendance by project personnel. 3. Delegate documentation demonstrates oversight of sub-vendor training plans and activities.	1. Delegate Documentation Met Not Met N/A Comments: 2. Training Documentation Met Not Met N/A Comments: 3. Delegate Oversight Met Not Met N/A Comments:
8.6.2	The project's orientation/in- service training includes training on Federal/State requirements for reporting or notification of child abuse, child molestation, sexual abuse, rape or incest, as well as on human trafficking	 Evidence that this requirement has been met includes: 1. Delegate documentation includes evidence of staff training within the current project period specific to this area which may include attendance records and certificates. 2. Delegate documentation demonstrates oversight of sub-vendor training activities for these topics. 	1. Delegate Documentation Met Not Met N/A Comments: 2. Delegate Oversight Met Not Met N/A Comments:

8.6.3	The project's orientation/in-	Evide	nce that this requirement has been met includes:			
	service training includes	1.	Delegate policies ensure that staff has received			
	training on involving family		training within the current project period on state-	1. Delegate F	Policies	
	members in the decision of		specific reporting/notification requirements.	Met	Not Met	N/A
	minors to seek family	2.	Documentation includes training attendance			
	planning services and on		records/certificates which indicate that training on	Comments:		
	counseling minors on how		family involvement counseling and sexual			
	to resist being coerced into		coercion counseling has been provided.			
	engaging in sexual activities.	3.	Delegate documentation demonstrates oversight	2. Delegate I	Documentation	
			of sub-vendor training activities on these topics.	Met	Not Met	N/A
				Comments:		
				3. Delegate C	Oversight	
				Met	Not Met	N/A
				Comments:		

Title X Program Requirement	Implementation Strategy	Assessment		
8.7 Planning and Evaluation	Evidence that this requirement has been met includes:			
Grantees must ensure that the	1. Delegate records demonstrate that the results of at	1. Delegate D	Occumentation	
project is competently and	least one needs assessment were used to develop	Met	Not Met	N/A
efficiently administered (42 CFR	the competing grant application.			
59.5 (b) (6) and (7)).	2. Delegate has a written plan for monitoring the	Comments:		
	delivery of all services described in approved			
	grant application including monitoring of sub-			
	vendors.		Ionitoring Plan	
	3. Delegate records document periodic assessment	Met	Not Met	N/A
	of work plan progress, including work plan			
	revisions when needed.	Comments:		
	4. Delegate collects and submits data for the Family			
	Planning Annual Report (FPAR) in a timely,			
	complete and accurate manner.	3. Data Subn		27/4
		Met	Not Met	N/A
	LINK TO QFP:			
	When designing evaluations, projects should follow	Comments:		
	the Recommendations for Providing Quality			
	Family Planning Services, which defines what			
	services to provide and how to do so and thereby			
	provides a framework by which program			
	evaluations can be developed. Projects should also			
	follow the QFP that defines 'quality' care and			
	describes how to conduct quality improvement			
	processes so that performance is monitored and			
	improved on an ongoing basis. QI activities should			
	be overseen by the delegate and occur at both the			
	delegate and sub-recipient levels.			
	Overlites Assessments			
	Quality Assessment:			
	1. Delegate demonstrates use of FPAR data to			
	calculate for delegate level the percentage of			

- 2. Delegate project records document the use of ongoing (i.e., at least annually) quality improvement processes related to the contraceptive use measure (see #1 above).
- 3. Delegate demonstrates use of FPAR data to calculate for all service sites the percentage of adolescent and adult women at risk of unintended pregnancy who use: (a) a most or moderately effective method of contraception, and (b) long-acting reversible methods of contraception.
- 4. Delegate project records document the use of ongoing (i.e., at least annually) quality improvement processes related to the contraceptive use measure across all service sites within the delegate network (see #2 above), and a description of steps taken by the delegate, service sites and sub-vendors in response to findings.
- 5. Delegate project records demonstrate the use of data at service site level to monitor other aspects of quality care (e.g., client experience, chlamydia screening rates, timelines and efficiency).
- 6. Delegate has implemented HIT and can demonstrate how its use has increased its ability to monitor the quality of care.

Quality Rating
Highly Developed
Fully Developed
Partially Developed
Being Developed
Needs Development

9. Project Services and Clients

	X Program Requirement	Implementation Strategy	Assessment	
9.1	Priority for project services is to persons from low-income families (Section 1006(c)(1), PHS Act; 42 CFR 59.5(a)(6)).	 Evidence that this requirement has been met includes: Data submitted to the Family Planning Annual Report by the delegate demonstrates that more than half of clients served have incomes that are at or below 100% of the Federal Poverty Level (FPL). Delegate Service site(s) are located in locations that are accessible for low income persons. 	1. FPAR Data Met Comments: 2. Location of Met Comments:	Not Met N/A Service Sites Not Met N/A
9.2	Services must be provided in a manner which protects the dignity of the individual (42 CFR 59.5 (a)(3)).	Evidence that this requirement has been met includes: 1. Delegate policies and procedures address protection of client dignity which may include: a.) Protection of client privacy. b.) A patient bill of rights which outlines rights and responsibilities.	Met Comments:	icies and Procedures Not Met N/A
		LINK TO QFP: A core premise of Recommendations for Providing Quality Family Planning Services is that quality services are client-centered, which includes providing services in a respectful and culturally competent manner.	9.2 All met + All met Half or More met One or More but less than	Quality Rating Highly Developed Fully Developed Partially Developed Being Developed
		Quality Assessment: 1. The delegate needs assessments (including those of the sub-vendors) describe populations that may be in need of culturally competent care. 2. The delegate has written policies and procedures that require their sites and sub-vendors to receive	half None	Needs Development

		training in culturally competent care. This should include how to meet the needs of the following key populations: LGBTQ, adolescents, individuals with limited English-proficiency, and the disabled. 3. Documentation (e.g., training records) that demonstrates staff have received training in providing culturally competent care to populations identified in the needs assessment. 4. Observation of the clinic environment demonstrates that it is welcoming (i.e., Privacy, cleanliness of exam rooms, ease of access to service, fair and equitable charges for services including waiver of fees for "good cause," language assistance). 5. Client surveys document that clients perceive providers and other clinic staff to be respectful.			
9.3	Services must be provided without regard to religion, race, color, national origin, disability, age, sex, number of pregnancies, or marital status (42 CFR 59.5 (a)(4)).	Evidence that this requirement has been met includes: 1. Delegate has written policies and procedures that require their service sites and any sub-vendor sites to provide service without regard to religion, race, color, national origin, disability, age, sex, number of pregnancies or marital status, and to inform staff of this requirement on an annual basis. 2. Documentation (e.g., staff circulars, orientation documentation, training curricula) demonstrates that staff has been informed at least once during employment that services must be provided without regard to religion, race, color, national origin, disability, age, sex, number of pregnancies or marital status.	1. Delegate P Met Comments: 2. Documenta Met Comments:	Not Met ation Not Met	N/A

Comments:

3. Delegate has documentation of monitoring of subvendors for compliance with non-discrimination requirements.

LINK TO OFP:

A core premise of Recommendations for Providing Quality Family Planning Services is that quality services are equitable, which includes providing high quality care to all clients, including adolescents, racial/ethnic minorities, LGBTQ individuals, clients with limited English proficiency, and persons living with disabilities.

Quality Assessment:

- 1. Delegate has project data on the characteristics of clients served in the past year that demonstrates a diverse client population reflective of the service area's demographics.
- 2. Observation of the service site demonstrates that it is physically accessible to persons living with disabilities
- 3. Service sites are open at times that are convenient to clients including evenings and/or weekends.
- 4. Educational materials that are tailored to literacy, age, and language preferences of client populations are available on-site.
- 5. Data from client experience surveys document that clients perceive providers and other clinic staff offer services in a non-discriminatory manner (e.g., provider communicates well, spends enough time, is helpful and courteous, etc.).

3. Delegate C	Oversight	
Documentation	on	
Met	Not Met	N/A

QFP elements	Quality Rating
documents by	
reviewer	
All met +	Highly Developed
All met	Fully Developed
Half or More	Partially Developed
met	
One or More	Being Developed
but less than	
half	
None	Needs Development

egate F let ments: egate F let ments: erral ag let ments: cument fet	Needs Assessme Not Met Policies Not Met Greements Not Met Ation at Service Not Met	N/A N/A N/A N/A
let	Policies Not Met	N/A
[[Met ☐ ments:	Met Not Met ments: legate Policies Met Not Met D

supported by other federal programs (42 CFR 59.5 (b)(8).	 Current written collaborative agreements with relevant referral agencies exist, including: emergency care, HIV/AIDS care and treatment agencies, infertility specialists, and chronic care management providers, and providers of other medical services not provided on-site. 	2. Delegate C Met Comments:	oversight- MOU Not Met	Js N/A
9.6 All grantees should assure services provided within their project operate within written clinical protocols that are in accordance with nationally recognized standards of care, approved by the grantee, and signed by the physician responsible for the service site.	Evidence that this requirement has been met includes: 1. The delegate has written policies and procedures requiring service sites and sub-vendors to operate within written clinical protocols aligned with nationally recognized standards of care and signed by the medical director or physician responsible for the service site. 2. Documentation exists that the delegate monitors all service sites and sub-vendors for the existence of current written clinical protocols that are aligned with nationally recognized standards of care (QFP) and signed by the medical director or physician responsible for the service sites. 3. Medical records document that clinical services align with approved protocols. LINK TO QFP: Delegates should follow QFP, which defines "family planning" services (i.e., contraception, pregnancy testing and counseling, achieving pregnancy, basic infertility services, STD services, preconception health services), describes what services should be offered by family	Met Comments: 2. Documenta Met Comments:	olicies and Pro Not Met ation of Monito Not Met cords Review Not Met	N/A

Comments:

	planning providers, and recommends how to provide those services by citing specific Federal and professional			
	medical associations' recommendations for clinical care.			
	 Quality Assessment: Written clinical protocols include the full scope of family planning services as defined in QFP including contraception, pregnancy testing and counseling, achieving pregnancy, basic infertility, STD, and preconception health services. Service sites have current clinical protocols (i.e., revised within the past 12 months) that reflect the most current version of Federal and professional medical associations' recommendations for each type of service, as cited in QFP. Documentation that clinical staff has participated in training on QFP (e.g., training available from 	QFP elements documents by reviewer All met + All met Half or More met One or More but less than half None	Quality Ratin Highly Devel Fully Develor Partially Develor Being Develor Needs Develor	loped ped veloped oped
	the Title X National Training Centers).			
	4. A review of medical records and/or			
	observational assessment confirms that the			
	recommended services are provided in a manner			
	consistent with QFP including those identified in			
	Tables 2 and 3 on pages 22-23.			
9.7 All projects must provide	Evidence that this requirement has been met includes:			_
for medical services related	1. The delegate has written policies and procedures	1. Delegate Po	licies and Prod	cedures
to family planning and the	requiring service sites and sub-vendors to provide	& Contracts		
• 1		l -		
effective usage of contraceptive devices and	medical services related to family planning as indicated in this section. This should also be	Met	Not Met	N/A

included in sub-vendor contracts.

practices (including physician's consultation,

examination, prescription, and continuing supervision, laboratory examination, contraceptive supplies) as well as necessary referrals to other medical facilities when medically indicated (42 CFR 59.5(b)(1)).

This includes, but is not limited to emergencies that require referral. Efforts may be made to aid the client in finding potential resources for reimbursement of the referral provider, but projects are not responsible for the cost of this care.

- 2. Current written (i.e., updated within the past 12 months) clinical protocols clearly indicate that the following services will be offered to female, male and adolescent clients as appropriate: a broad range of contraceptives, pregnancy testing and counseling, services to assist with achieving pregnancy, basic infertility services, STD services, and preconception health services.
- 3. Breast and cervical cancer screening are available on-site and offered to female clients.
- 4. Written collaborative agreements with relevant referral agencies exist, including: emergency care, HIV/AIDS care and treatment providers, infertility specialists, primary care and chronic care management providers.
- 5. Medical records document that clients are provided referrals when medically indicated.

2. Clinical Pr	otocols				
Met	Not Met	N/A			
Comments:					
3. Clinical Pr	otocols				
Met	Not Met	N/A			
Comments:					
4. Collaborative Agreements					
Met	Not Met	N/A			
Comments:					
5. Medical Re	ecords Review				
Met	Not Met	N/A			

Comments:

9.8	All Projects must provide a
	broad range of acceptable
	and effective medically
	approved family planning
	methods (including natural
	family planning methods)
	and services (including
	infertility services and
	services for adolescents).

If an organization offers only a single method of family planning, it may participate as part of a project as long as the entire project offers a broad range of family planning services. (42 CFR 59.5(a)(1)).

Evidence that this requirement has been met includes:

- 1. Medical record reviews demonstrate that clients are provided a broad range of acceptable and effective medically approved family planning methods (including natural family planning methods) and services (including infertility services and services for adolescents).
- 2. Services provided by the delegate and each subvendor, when viewed in its entirety provide, a broad range of effective and medically (FDA-approved) methods and services.
- 3. A review of the current stock of contraceptive methods demonstrates that a broad range of methods, including LARCs, are available onsite (optimally) or by referral.
- 4. Clinic protocols state that the following services will be provided to female, male, and adolescent clients as appropriate: contraception, pregnancy testing and counseling, services for achieving pregnancy, basic infertility services, STD services, and preconception health services.
- 5. Delegate documentation indicates oversight of service sites and/or sub-vendors compliance with this section.

LINK TO OFP:

The QFP notes the special needs of adolescent clients and recommends ways to address those needs, e.g., how to tailor contraceptive counseling for adolescents and ways to make services more youth-friendly.

The QFP also notes the need to offer a broad range of contraceptive methods, and that this is an important

Met	Not Met	N/A
Comments:		
2. Range of So		
Met	Not Met	N/A
Comments:		
3. Stock at Se	rvice Site Not Met	N/A
Niet		IN/A
Comments: 4. Documenta	tion at Sarvice	a Sita
Met	Not Met	N/A
		IV/A
Comments:		
5. Delegate O	versight	
Met	Not Met	N/A

part of providing client-centered care that respects the individual's choice. Projects should have a system in place to ensure continuous access to a broad range of FDA-approved contraceptive methods, optimally onsite.

Quality Assessment:

- 1. All services listed in QFP are offered to female and male clients, including adolescents as specified in clinical protocols.
- 2. A review of clinic/pharmacy records demonstrates no stock-out of any contraceptive method that is routinely offered occurred during the past 6 months.
- 3. A review of the service site's FPAR data demonstrates that the proportion of adolescents served is close to or above the national average (as documented in FPAR).
- 4. A review of the service site's FPAR data demonstrates that the proportion of males receiving family planning services is close to or above the national average.
- 5. A review of medical records confirms that adolescents have been counseled about abstinence, the use of condoms and other contraceptive methods, including LARCs.

QFP elements	Quality Rating
documents by	
reviewer	
All met +	Highly Developed
All met	Fully Developed
Half or More	Partially Developed
met	
One or More	Being Developed
but less than	
half	
None	Needs Development

9.9	Services must be provided without the imposition of any durational residency requirement or requirement that the client be referred by a physician (42 CFR 59.5(b)(5)).	 Evidence that this requirement has been met includes: The delegate has a written policy stating that service sites and sub-vendors must provide services without the imposition of any durational residence requirement or a requirement that the client be referred by a physician. Written clinic policies explicitly address this requirement. 	1. Delegate P Met Comments: 2. Documenta Met Comments:	olicies Not Met D ation at Service Not Met D	N/A Site N/A N/A
9.10	pregnancy diagnosis and counseling to all clients in need of these services (42 CFR 59.5(a)(5)).	Evidence that this requirement has been met includes: 1. The delegate has a written policy requiring its service sites and all sub-vendors to provide pregnancy diagnosis and counseling services to all clients in need of these services. 2. Clinic inventory and medical records review demonstrates that pregnancy testing and counseling is available and offered to all clients in need of these services.	Met	Not Met Interpretation at Service Not Met	N/A
		LINK TO QFP: Projects should follow QFP, which describes how to provide pregnancy testing and counseling services, and cites the clinical recommendations of the relevant professional medical associations. Quality Assessment: 1. Written clinical protocols regarding pregnancy testing and counseling are in accordance with the	Comments:		

		1			
			recommendations presented in QFP, including		
			reproductive life planning discussions and		1
			medical histories that include any coexisting	QFP elements	Quality Rating
			conditions.	documents by	
		2.	Chart review demonstrates that clients with a	reviewer	
			positive pregnancy test who wish to continue the	All met +	Highly Developed
			pregnancy receive initial prenatal counseling and	All met	Fully Developed
			are assessed regarding their social support.	Half or More	Partially Developed
		3.	Chart review demonstrates that clients with a	met	
			negative pregnancy test who do not want to	One or More	Being Developed
			become pregnant are offered same day	but less than	
			contraception, if appropriate.	half	
		4.		None	Needs Development
			counseling recommendations presented in QFP		
			at least once during employment		
		5.	Observation and/or medical record review		
			demonstrates counseling recommendations in		
			accordance with the principles presented in QFP		
			including reproductive life planning discussions.		
9.11	Projects must offer pregnant	Eviden	ice that this requirement has been met includes:		
	women the opportunity to be	1.	The delegate has written policies and procedures	1. Delegate Pol	icies and Procedures
	provided information and		requiring its service sites and all sub-vendors to	Met	Not Met N/A
	counseling regarding each of		offer options counseling to pregnant women.		
	the following options:	2.	Written clinical protocols ensure that pregnant	Comments:	•
			clients are offered neutral, factual information,		
	 prenatal care and 		and non-directive counseling about all three		
	delivery;		pregnancy options except for those options that	2. Documentati	ion at Service Site
	• infant care, foster care,		the woman does not wish to receive information,	Met	Not Met N/A
	or adoption; and		and that referrals requested by the client are		
	• pregnancy termination.		provided to her.	Comments:	•
		3.	Medical records of pregnant clients document		
	If requested to provide such		that clients were offered the opportunity to be		
	information and counseling,		provided with information and counseling about		
	<i>6</i> 7	l	<u> </u>		

	provide neutral, factual information and nondirective counseling on each of the options, and referral upon request, except with respect to any options(s) about which the pregnant woman indicates she does not wish to receive	4.	all three pregnancy options, except those for which the woman did not want to receive information and counseling. Medical records of pregnant clients document that referrals were made as requested.	Information Met Comments:	& Counseling Not Met	N/A
	such information and			Met	Not Met	N/A
	counseling (42 CFR					
	59.5(a)(5)).			Comments:	1	
				L		l
9.12	Title X grantees must	Evide	nce that this requirement has been met includes:			
	comply with applicable	1.	The delegate has written policy and procedures	1. Delegate I	Policies and Cor	ntracts
	legislative mandates set out		requiring their service sites and all sub-vendors to	Met	Not Met	N/A
	in the HHS appropriations		inform their staff periodically that: (a) clinic staff			
	act. Grantees must have		must encourage family participation in the	Comments:		
	written policies in place that		decision of minors to seek FP services, (b) minors			
	address these legislative		must be counseled on how to resist attempts to	2. Documentation at Service Site		
	mandates:		coerce them into engaging in sexual activities,			
			and (c) State law must be followed requiring	Met	Not Met	N/A
	"None of the funds		notification or the reporting of child abuse, child			
	appropriated in the Act may		molestation, sexual abuse, rape, or incest.	Comments:		
	be made available to any		Delegate contracts with sub-vendors include these			
	entity under Title X of the		requirements.			
	Public Health Service Act	2.	Documentation (e.g., staff circulars, training			
	unless the applicant for the		curricula) demonstrates that all staff has been	Met	Not Met	N/A
	award certifies to the		formally informed about items 1a-c above at least			
	Secretary of Health and		once during their employment and when laws	Comments:		
	Human Services that it		change.			
	encourages family					

participation in the decision of minors to seek family planning services and that it provides counseling to minors on how to resist attempts to coerce minors into engaging in sexual	3. Medical records of minors document encouragement regarding family participation in their decision to seek family planning services and counseling on how to resist attempts to being coerced into engaging in sexual activities.	4. Medical ReMet Comments:	ecord Review- Not Met	N/A
"Notwithstanding any other provision of law, no provider of services under Title X of the Public Health Service Act shall be exempt from any State law requiring notification or the reporting of child abuse, child molestation, sexual abuse, rape, or incest."				

10. Confidentiality

Title X Program Requirement	Implementation Strategy	Assessment		
10. Confidentiality	Evidence that this requirement has been met includes:			
Every project must have safeguards	1. The delegate has a written policy requiring that	1. Delegate P	olicies and Con	tracts
to ensure client confidentiality.	all service sites and sub-vendors safeguard client	Met	Not Met	N/A
Information obtained by project	confidentiality. Delegate contracts with sub-			
staff about an individual receiving	vendors include this requirement.	Comments:		
services may not be disclosed	2 Documentation (e.g., staff circulars, new			
without the individual's	employee orientation documentation, training			
documented consent, except as	curricula) demonstrates that staff has been	2. Documenta	ation of Trainin	g
required by law or as may be	informed at least once during period of	Met	Not Met	N/A
necessary to provide services to the				

individual, with appropriate		employment about policies related to preserving	Comments:		
safeguards for confidentiality.		client confidentiality and privacy.			
Information may otherwise be	3	Clinical protocols and policies have statements			
disclosed only in summary,		related to client confidentiality and privacy.	3. Clinical Pr	otocols	
statistical, or other form that does	4.	The health records system has safeguards in place	Met	Not Met	N/A
not identify the individual (42 CFR		to ensure adequate privacy, security and			
59.11).		appropriate access to personal health information.	Comments:		
	5.	There is evidence that HIPAA privacy forms are			
		provided to clients and signed forms are collected	4 9 . 9.	D 1.0	
		as required.		e- Records Sys	
	6.	General consent forms for services state that	Met	Not Met	N/A
		services will be provided in a confidential			
	_	manner, and note any limitations that may apply.	Comments:		
	7.	Third party billing is processed in a manner that			
		does not breach client confidentiality, particularly	5. HIPAA		
		in sensitive cases (e.g., adolescents or young	Met	Not Met	N/A
		adults seeking confidential services, or individuals for whom billing the policy holder			
		could result in interpersonal violence).	Comments:		
	8	Client education materials (e.g., posters, videos,			
	0.	flyers) noting the client's right to confidential			
		services are freely available to clients.	6. Consent Fo	orms	
	9	The physical layout of the facility ensures that	Met	Not Met	N/A
	,	client services are provided in a manner that			
		allows for confidentiality and privacy.	Comments:		
		in the state of th			
			7. Third Party		T 1
			Met	Not Met	N/A
			Comments:		

				8. Client Edu	cation Material	S
				Met	Not Met	N/A
				Comments:		
				9. Physical L	ayout	
				Met	Not Met	N/A
				Comments:		
	ommunity Participation, Educ		·	A 22222224		
	X Program Requirement		mentation Strategy	Assessment		
11.1	Title X grantees and sub-		nce that this requirement has been met includes:	151 . 5		
	recipient agencies must	1.	The delegate has a written policy and procedures		Policies and Pro	
	provide an opportunity for		in place for ensuring that there is an opportunity	Met	Not Met	N/A
	participation in the		for community participation in developing,			
	development,		implementing, and evaluating the project plan.	Comments:		
	implementation, and		Participants should include individuals who are			
	evaluation of the project by		broadly representative of the population to be			
	persons broadly		served, and who are knowledgeable about the	2. Communit	y Engagement 1	Plan
	representative of all		community's needs for family planning services.	Met	Not Met	N/A
	significant elements of the	2.	The community engagement plan: (a) engages			
	population to be served; and		diverse community members including	Comments:	•	•
	by persons in the community		adolescents and current clients, and (b) specifies			
	knowledgeable about the		ways that community members will be involved			
	community's needs for		in efforts to develop, assess, and/or evaluate the	3. Documenta	ation	
	family planning services (42		program.	Met	Not Met	N/A
	CFR 59.5(b)(10)).	2	Documentation demonstrates that the community			
	C1 K 39.3(0)(10)).] 3.	· · · · · · · · · · · · · · · · · · ·	Comments:]	
			engagement plan has been implemented (e.g.,	Comments.		
			reports, meeting minutes, etc.)			

11.2	Projects must establish
	and implement planned
	activities to facilitate
	community awareness of
	and access to family
	planning services (42 CFR
	59.5(b)(3)). Each family
	planning project must
	provide for community
	education programs (42
	CFR 59.5(b)(3)).

The community education program(s) should be based on an assessment of the needs of the community and should contain an implementation and evaluation strategy.

Evidence that this requirement has been met includes:

- 1. Documentation demonstrates that the delegate conducts periodic assessment of the needs of the community with regard to their awareness of and need for access to family planning services.
- 2. Delegate has a written community education and service promotion plan that has been implemented (e.g., media spots/materials developed, event photos, participant logs, and monitoring reports). The plan: (a) states that the purpose is to enhance community understanding of the objectives of the project, make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial, (b) promotes the use of family planning among those with unmet need, (c) utilizes an appropriate range of methods to reach the community, and (d) includes an evaluation strategy.
- 3. Documentation that evaluation has been conducted, and that program activities have been modified in response.

1. Delegate Needs Assessment Met Not Met N/A					
Comments:					

2. Community Education Plan				
Met	Not Met	N/A		
Comments:				

3. Evaluation Activities					
Met	Not Met	N/A			
Comments:					

states that the purpose is to enhance community understanding of the objectives of the project, make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial (42 CFR 59.5 (b)(3) states that the purpose is to enhance community understanding of the objectives of the project, make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial, (b) promotes the use of family planning among those with unmet need, (c) utilizes an appropriate range of methods to reach the community, and (d) includes an evaluation strategy. 2. There is documentation that the plan has been implemented and evaluated. Met	11.3	Community education should serve to enhance community understanding of the objectives of the	Evidence that this requirement has been met includes: 1. The delegate has developed a community education and service promotion plan that: (a)	1. Delegate C	Community Edu on Plan	cation
availability of services to potential clients, and encourage continued encourage continued participation by persons to whom family planning may be beneficial (42 CFR 59.5 (b)(3) make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial, (b) promotes the use of family planning among those with unmet need, (c) utilizes an appropriate range of methods to reach the community, and (d) includes an evaluation strategy. 2. There is documentation that the plan has been make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial, (b) promotes the use of family planning among those with unmet need, (c) utilizes an appropriate range of methods to reach the community, and (d) includes an evaluation strategy. 2. Delegate Implementation of Community Education and Promotion Plan		project, make known the	* *	-		
2. There is documentation that the plan has been Met Not Met N/A		potential clients, and encourage continued participation by persons to whom family planning may be beneficial (42 CFR 59.5	make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial, (b) promotes the use of family planning among those with unmet need, (c) utilizes an appropriate range of methods to reach the community, and (d) includes an evaluation	Comments: 2. Delegate In Community I	mplementation of	
			e:	Met	Not Met	N/A
			•			

12. Information and Education Materials Approval

Title 2	X Program Requirement	Implementation Strategy	Assessment		
12.1	Title X grantees and sub-	Evidence that this requirement has been met includes:			
	recipient agencies are	1. Delegate has policies and procedures that ensure	1. Delegate P	olicies and	
	required to have a review	materials are reviewed prior to being made	Procedures		
	and approval process, by	available to the clients that receive services	Met	Not Met	N/A
	an Advisory Committee, of	within the project. If a delegate sub-contracts			
	all informational and	for services, the delegate must ensure that sub-	Comments:		
	educational materials	vendors have a process in place that meets this			
	developed or made	requirement.			
	available under the project	Committee meeting minutes (delegate or sub-	2. Documenta	ation	
	prior to their distribution	vendor, as applicable) demonstrate the process	Met	Not Met	N/A
	(Section 1006 (d)(2), PHS	used to review and approve materials.			
	Act; 42 CFR 59.6(a)).		Comments:		

12.2	The committee must include individuals broadly representative (in terms of demographic factors such as race, color, national origin, handicapped condition, sex and age) of the population or community for which the materials are intended (42 CFR 59.6 (b)(2).	Evidence that this requirement has been met includes: 1. The delegate has established a project advisory board that is comprised of members who are broadly representative of the population served. 2. If a delegate sub-contracts for services, the delegate must ensure that sub-vendors have a process in place that meets this requirement. 3. Delegate (and/or sub-vendors) documentation (meeting minutes, lists of board members, etc.) demonstrates this requirement has been met.	1. Advisory I Met Comments: 2. Delegate C Met Comments:	Not Met	N/A N/A
			3. Documenta Met	ation Not Met	N/A
			Niet		
			Comments:		
12.3	Each Title X grantee must have an Advisory Committee of five to nine members, except that the size provision may be waived by the Secretary for good cause shown (42 CFR 59.6 (b)(1)). The Advisory Committee must review and approve all informational and educational (I&E) materials developed or	 Evidence that this requirement has been met includes: Delegate has policies and procedures addressing this element. Delegate maintains and updates Lists/Rosters of Advisory Committee members. Delegate maintains Advisory Committee written meeting minutes. Advisory committee minutes indicate that the committee is active. 	1. Delegate P Procedures Met Comments: 2. Documents Met Comments:	Not Met Ation-Rosters/L Not Met	ists N/A

made available under the			
project prior to their			
distribution to assure that	3. Oversight-	Delegate Maint	ains
the materials are suitable	Meeting Min	utes	
for the population and	Met	Not Met	N/A
community for which they			
are intended and to assure	Comments:		•
their consistency with the			
purposes of Title X	4. Documenta	ation- Meeting	
(Section 1006(d)(1), PHS	Minutes		
Act; 42 CFR 59.6(a)).	Met	Not Met	N/A
	Comments:		

12.4	The grantee may delegate I&E functions for the review and approval of materials to sub-recipient agencies; however, the oversight of the I&E review process rests with the grantee.	Evidence that this requirement has been met includes: 1. Delegate policies and procedures indicate responsibility for this element. If the delegate chooses to delegate this activity, delegate policies indicate how the delegate will maintain oversight of the process. 2. Delegate documentation indicates that an oversight process has been implemented by the delegate. 2. Delegate Oversight Met Not Met N/A Comments: 2. Delegate Oversight Met Not Met N/A Comments:	• Met/no • Consult • QFP ass • Grantee
12.5	The Advisory Committee(s) may delegate responsibility for the review of the factual, technical, and clinical accuracy to appropriate project staff; however, final responsibility for approval of the I&E materials rests with the Advisory Committee.	Evidence that this requirement has been met includes: 1. Delegate Policies and procedures specify if the factual, technical and clinical accuracy components of the review are delegated to project staff, final responsibility for approval of the I&E materials rests with the Advisory Committee. 2. If review of factual, technical, and /or clinical content has been delegated, there is evidence of advisory committee oversight and final approval. Evidence that this requirement has been met includes: 1. Delegate Policies Met Not Met N/A Comments: 2. Records of Advisory Committee (if delegated) Met Not Met N/A Comments:	

12.6	The I&E Advisory	Evide	nce that this requirement has been met includes:			
	Committee(s) must:	1.	Delegate policies and procedures document that	1. Delegate P	olicies and	
•	consider the educational		the required elements of this section are	Procedures		
	and cultural backgrounds		addressed.	Met	Not Met	N/A
	of the individuals to whom	2.	Meeting minutes and/or review forms document			
	the materials are addressed;		that all required components are addressed.	Comments:		•
•	consider the standards of					
	the population or					
	community to be served			2. Documenta	tion	
	with respect to such			Met	Not Met	N/A
	materials;					
•	review the content of the			Comments:		
	material to assure that the					
	information is factually					
	correct;					
•	determine whether the					
	material is suitable for the					
	population or community					
	to which it is to be made					
	available; and					
•	establish a written record of					
	its determinations (Section					
	1006(d), PHS Act; 42 CFR					
	59.6(b)).					

13. Additional Administrative Requirements

Program Requirement	Implementation Strategy	Assessment		
13.1 Facilities and Accessibility of	Evidence that this requirement has been met includes:	1. Delegate P	aliaias	
Services	1. Delegate policies assure language translation services are readily provided when needed.	Met	Not Met	N/A
	5 2			

Title X clinics must have written policies that are consistent with the HHS Office for Civil Rights policy document, *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin*

For more guidance on how to encourage accessibility, see Part II of Family Planning
Services Guidance.

Discrimination Affecting Limited English Proficient Persons (August 4, 2003) (HHS Grants Policy Statement 2007, II-23). 2. Service site documentation indicates that staff is aware of policies and processes that exist to access language translation services when needed.

LINK TO QFP:

When developing written policies that meet these requirements, projects implement the recommendations presented in "Appendix E" of the QFP.

Strategies that can make information more accessible for clients with Limited English Proficiency include:

- Presenting information in the client's primary language.
- Providing translation services.

Ensure that information is culturally appropriate and reflects the client's beliefs, ethnic background and cultural practices.

Quality Assessment:

- 1. Educational materials are clear and easy to understand (e.g., 4th-6th grade reading level).
- 2. Observation demonstrates that information is presented in a way that emphasizes essential points (e.g., limits the amount of information presented appropriately).
- 3. Observation demonstrates information on risks and benefits is communicated in a way that is easily understood (e.g., using natural frequencies and common denominators).
- 4. Information provided during counseling is culturally appropriate and reflects the client's beliefs, ethnic background and cultural practices.

Comments:		

2. Service Site Documentation

Met	Not Met	N/A
Comments:		

QFP elements	Quality Rating
documents by	
reviewer	
All met +	Highly Developed
All met	Fully Developed
Half or More	Partially Developed
met	
One or More	Being Developed
but less than	_
half	
None	Needs Development

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	5. Educational materials are tailored to literacy, age, and language preferences of client populations.			
Projects may not discriminate on the basis of disability and, when viewed in their entirety, facilities must be readily accessible to people with disabilities (45 CFR 84).	 Evidence that this requirement has been met includes: Delegate policies and procedures ensure access to services for individuals with disabilities at their sites and at all sub-vendor sites. Delegate maintains documentation of any accommodations made for disabled individuals. Project sites are free from obvious structural or other barriers that would prevent disabled individuals from accessing services. 	1. Delegate P Met Comments: 2. Documenta Met Comments: 3. Service Sit Met Comments:	Not Met ation Not Met	N/A

100.41		11.51.5	D1	
13.2 All grantees, sub recipients	Evidence that this requirement has been met includes:		Pisaster Plans	
and Title X clinics are required to	1. Delegate disaster plans have been developed and	Met	Not Met	N/A
have a written plan for the	are available to staff.			
management of emergencies (29	2. Staff can identify emergency evacuation routes.	Comments:		
CFR 1910, subpart E) and clinical	3. Staff has completed training and understands their			
facilities must meet applicable	role in an emergency or natural disaster.		ify Evacuation	Routes
standards established by Federal	4. Exits are recognizable and free from barriers.	Met	Not Met	N/A
State and local governments (e.g.	5. Delegate documentation demonstrates oversight			
local fire, building, and licensing	of sub-vendors and service sites compliance with	Comments:		
codes)	these requirements.			
	•	3. Staff Train	ing	
		Met	Not Met	N/A
		Comments:		•
		4. Recogniza		
		Met	Not Met	N/A
		Comments:		
		5. Delegate C	oversight	
		Met	Not Met	N/A
		Comments:		

13.3 Projects are required to	Evidence that this requirement has been met includes:	1. Delegate P	olicies	
establish policies to prevent	1. Delegate policies address this requirement.	Met	Not Met	N/A
employees, consultants, or members	2. There is evidence of delegate oversight of service			
of governing/advisory bodies from	sites/sub-vendors for compliance with this	Comments:		
using their positions for purposes	requirement.			
that are, or give the appearance of				
being motivated by a desire for		2. Delegate O	versight	
private financial gain for		Met	Not Met	N/A
themselves or others (HHS Grants				
Policy Statement 2007, II-7)		Comments:		
13.4 Research conducted within	Evidence that this requirement has been met includes:	1. Delegate P	olicies	
1511 Itesearen conaactea within				
Title X projects may be subject to	<u> </u>			N/A
Title X projects may be subject to Department of Health and Human	1. Delegate policies address this requirement	Met	Not Met	N/A
Department of Health and Human	 Delegate policies address this requirement There is evidence of delegate oversight of service 	Met		N/A
Department of Health and Human Services regulations regarding the	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 			N/A
Department of Health and Human	 Delegate policies address this requirement There is evidence of delegate oversight of service 	Met	Not Met	N/A
Department of Health and Human Services regulations regarding the protection of human subjects (45	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 	Met Comments:	Not Met	N/A
Department of Health and Human Services regulations regarding the protection of human subjects (45 CFR Part 46). The grantee/sub-	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 	Met Comments: 2. Delegate O	Not Met Diversight	
Department of Health and Human Services regulations regarding the protection of human subjects (45 CFR Part 46). The grantee/sub- recipient should advise their	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 	Met Comments: 2. Delegate O Met	Not Met Dversight Not Met	N/A
Department of Health and Human Services regulations regarding the protection of human subjects (45 CFR Part 46). The grantee/sub- recipient should advise their Regional Office in writing of any	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 	Met Comments: 2. Delegate O Met	Not Met Dversight Not Met	N/A
Department of Health and Human Services regulations regarding the protection of human subjects (45 CFR Part 46). The grantee/sub- recipient should advise their Regional Office in writing of any research projects that involve Title	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 	Met Comments: 2. Delegate O Met	Not Met Dversight Not Met	N/A
Department of Health and Human Services regulations regarding the protection of human subjects (45 CFR Part 46). The grantee/subrecipient should advise their Regional Office in writing of any research projects that involve Title X clients (HHS Grants Policy	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 	Met Comments: 2. Delegate O Met	Not Met Dversight Not Met	N/A
Department of Health and Human Services regulations regarding the protection of human subjects (45 CFR Part 46). The grantee/subrecipient should advise their Regional Office in writing of any research projects that involve Title X clients (HHS Grants Policy	 Delegate policies address this requirement There is evidence of delegate oversight of service sites/sub-vendors for compliance with this 	Met Comments: 2. Delegate O Met	Not Met Dversight Not Met	N/A