|  |
| --- |
| **REPRODUCTIVE HEALTH FAMILY PLANNING (RHFP) PROGRAM FISCAL REVIEW** |
| **Instructions:** The WI DHS RHFP Nurse Consultant will use this review form to complete the Fiscal Review |
| Subrecipient | RHFP Program Reviewer | Date of Review |
|       |       |       |
| **REQUIRED DOCUMENTS** |
| Subrecipients must have documentation and evidence that support and demonstrate compliance with Title X Program requirements. These documents ensure that what is contained in written policy is being carried out and substantiate that the project is operating in accordance with Title X Program expectations. |
| **Documents** | **Result** | **Comments** |
| Chart Audit – a chart audit has been completed for this review. |  |       |
| Schedule of Discounts – a clinic schedule of discounts has been provided for this review. |  |       |
| Fee Schedule – a clinic fee schedule has been provided for this review. |  |       |
| DHS Contract - a current signed grant contract between grantee and subrecipient is in place. |  |       |
| Family Planning Services Contract – if family planning services are provided by contract with actual providers of services, they are provided in accordance with a plan that establishes rates and method of payment for services. |  |       |
| Financial Expense Reports – expenses are reported in a timely matter electronically through Smartsheet.  |  |       |
| Agency Audit – as required, per [45 CFR part 75](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75), an audit has been completed within the last 12 months. |  |       |
| Cost Analysis – a cost analysis using one of the DHS recommended templates has been completed within the last three (3) years. |  |       |
| **REQUIRED TRAININGS** |
| Title X staff must receive appropriate and adequate training. These required trainings support staff in operating in accordance with Title X Program requirements and the Providing Quality Family Planning Services Recommendations of CDC and the U.S. Office of Population Affairs (QFP).Each staff member working with the Title X program shall have completed the trainings listed below for the current project period and grant year.* **Annual** – 4/1/202X through 3/31/202X.
* **Project Period** – 4/1/2022 through 3/31/2027
 |
| **Annual Trainings** | **Result** | **Comments** |
| Family Involvement and Coercion |  |       |
| State Reporting Requirements: Mandatory Reporting for Abuse, Rape, Incest, and Human Trafficking |  |       |
| **Project Period Trainings** | **Result** | **Comments** |
| Client-Centered Services |  |       |
| Confidentiality |  |       |
| Non-Discriminatory Services |  |       |
| Personnel Awareness |  |       |
| Personnel Training |  |       |
| Services Not a Prerequisite for Eligibility or Services |  |       |
| Voluntary and Non-Coercive Services |  |       |
| Providing QFP Toolkit (RHNTC) or equivalent |  |       |
| **EXPECTATIONS** |
| For an expectation to be considered met, subrecipient must: meet all required documentation and training line items listed above **AND** meet all policy, procedure, and site evaluation line items in each listed expectation below. |
| **Expectation 1.9:** Ensure that all information as to personal facts and circumstances obtained by the project staff about individuals receiving services must be held confidential and must not be disclosed without the individual’s documented consent, except as may be necessary to provide services to the patient or as required by law, with appropriate safeguards for confidentiality. Information may otherwise be disclosed only in summary, statistical, or other form that does not identify the individual. Reasonable efforts to collect charges without jeopardizing client confidentiality must be made. Recipients must inform the client of any potential for disclosure of their confidential health information to policyholders where the policyholder is someone other than the client. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Third party billing is processed in a manner that does not breach client confidentiality.[ ]  Physical layout of the clinic allows for confidentiality and privacy.[ ]  Safeguards in place ensure privacy, security, and appropriate access to personal health information.[ ]  Chart audit demonstrates compliance with this expectation.  |
| **Result** | **Comments** |
|  |       |
| **Expectation 1.13:** Enroll in the 340B Program and comply with all 340B Program requirements, including annual recertification and avoiding diversion or duplicate discounts. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Current 340B certification.[ ]  Staff interviews/observations indicate compliance with this expectation.  |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.1:** Provide that no charge will be made for services provided to any clients from a low-income family except to the extent that payment will be made by a third party (including a government agency) that is authorized to or is under legal obligation to pay this charge. Low-income family means a family whose total annual income does not exceed 100 percent of the most recent Poverty Guidelines issued pursuant to 42 U.S.C. 9902(2). “Low-income family” also includes members of families whose annual family income exceeds this amount, but who, as determined by the project director, are unable, for good reasons, to pay for family planning services. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Chart audit demonstrates compliance with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.2:** Unemancipated minors who wish to receive services on a confidential basis must be considered on the basis of their own resources. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Chart audit demonstrates compliance with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.3:** Provide that charges will be made for services to clients other than those from low-income families in accordance with a schedule of discounts based on ability to pay, except that charges to persons from families whose annual income exceeds 250 percent of the levels set forth in the most recent Poverty Guidelines issued pursuant to 42 U.S.C. 9902(2) will be made in accordance with a schedule of fees designed to recover the reasonable cost of providing services. The schedule of discounts should be updated annually in accordance with the FPL.The HRSA Health Center Program and the OPA Title X Program have unique Sliding Fee Discount Schedule (SFDS) program expectations, which include having differing upper limits. Title X agencies (or providers) that are integrated with or receive funding from the HRSA Health Center Program may have dual fee discount schedules: one schedule that ranges from 101% to 200% of the FPL for all health center services, and one schedule that ranges from 101% to 250% FPL for clients receiving only Title X family planning services directly related to preventing or achieving pregnancy, and as defined in their approved Title X project. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  A cost analysis using the RHFP recommended template has been completed within the last three (3) years.[ ]  The SFDS has been updated to reflect the current FPL.[ ]  Chart audit demonstrates compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.4:** Ensure that family income is assessed before determining whether copayments or additional fees are charged. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Chart audit demonstrates compliance with this expectation.  |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.5:** Ensure that, with regard to insured clients, clients whose family income is at or below 250 percent of the FPL should not pay more (in copayments or additional fees) than what they would otherwise pay when the schedule of discounts is applied. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Chart audit demonstrates compliance with this expectation.  |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.6:** Take reasonable measures to verify client income, without burdening clients from low-income families. Recipients that have lawful access to other valid means of income verification because of the client’s participation in another program may use those data rather than re-verify income or rely solely on clients’ self-report. If a client’s income cannot be verified after reasonable attempts to do so, charges are to be based on the client’s self-reported income. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.7:** Take all reasonable efforts to obtain the third-party payment without application of any discounts, if a third party (including a government agency) is authorized or legally obligated to pay for services. Where the cost of services is to be reimbursed under title XIX, XX, or XXI of the Social Security Act, a written agreement with the title XIX, XX, or XXI agency is required. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Chart audit demonstrates compliance with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.9:** Provide that if family planning services are provided by contract or other similar arrangements with actual providers of services, services will be provided in accordance with a plan that establishes rates and method of payment for medical care. These payments must be made under agreements with a schedule of rates and payment procedures maintained by the recipient. The recipient must be prepared to substantiate that these rates are reasonable and necessary. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.10:** Comply with all terms and conditions outlined in the grant award, including grant policy terms and conditions contained in applicable Department of Health and Human Services (HHS) Grant Policy Statements (GPS), (note any references in the GPS to 45 CFR Part 74 or 92 are now replaced by 45 CFR Part 75, and the SF269 is now the SF-425), and requirements imposed by program statutes and regulations, Executive Orders, and HHS grant administration regulations, as applicable, as well as any requirements or limitations in any applicable appropriations acts. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.13:** Ensure that program income (fees, premiums, third-party reimbursements the project may reasonably expect to receive), as well as State, local and other operational funding, will be used to finance the non-federal share of the scope of project as defined in the approved grant application and reflected in the approved budget. Program income and the level projected in the approved budget will be used to further program objectives. Program Income may be used to meet the cost sharing or matching expectation of the Federal award. The amount of the Federal award stays the same. Program Income in excess of any amounts specified must be added to the federal funds awarded. They must be used for the purposes and conditions of this award for the duration of the Project period. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Program generated income (PGI) earned/expensed are reported on monthly expense reports.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 5.14:** Ensure that Title X funds shall not be expended for any activity (including the publication or distribution of literature) that in any way tends to promote public support or opposition to any legislative proposal or candidate for public office. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 6.5:** In accordance with 45 CFR § 75.352(d), monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Expenses reported are in accordance with a current contract monitor-approved agency budget.[ ]  Participate in required site reviews.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **Expectation 6.7:** Verify that every subrecipient is audited as required by Subpart F of 45 CFR Part 75 when it is expected that the subrecipient's federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in 45 CFR § 75.501. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  As applicable, a current audit is completed as required by Subpart F of 45 CFR Part 75. |
| **Result** | **Comments** |
|  |       |
| **Expectation 11.4:** Ensure that non-Title X abortion activities are separate and distinct from Title X project activities. Where recipients conduct abortion activities that are not part of the Title X project and would not be permissible if they were, the recipient must ensure that the Title X-supported project is separate and distinguishable from those other activities. What must be looked at is whether the abortion element in a program of family planning services is so large and so intimately related to all aspects of the program as to make it difficult or impossible to separate the eligible and non-eligible items of cost. The Title X project is the set of activities the recipient agreed to perform in the relevant grant documents as a condition of receiving Title X funds. A grant applicant may include both project and non-project activities in its grant application, and, so long as these are properly distinguished from each other and prohibited activities are not reflected in the amount of the total approved budget, no problem is created. Separation of Title X from abortion activities does not require separate recipients or even a separate health facility, but separate bookkeeping entries alone will not satisfy the spirit of the law. Mere technical allocation of funds, attributing federal dollars to non-abortion activities, is not a legally supportable avoidance of section 1008. Certain kinds of shared facilities are permissible, so long as it is possible to distinguish between the Title X supported activities and non-Title X abortion-related activities. |
| [ ]  Written policy and procedure comply with this expectation.[ ]  Staff interviews/observations indicate compliance with this expectation. |
| **Result** | **Comments** |
|  |       |
| **SIGNATURE** — Reviewer | Name — Reviewer (printed) | Date Signed |
|  |       |  |