

# NYS Family Planning Program Annual Program Update

RAE ANN AUGLIERA MEAGHAN CARROLL MARLENA CUMMINS NICOLE FURMAN

November 14, 2018

### **NYSFPP Annual Program Update - Overview**

- NYSDOH Staff
- Division of Family Health Priorities & Focus Areas
- NYS Family Planning Program Overview & Impact
- FY 2018 Title X Program Priorities
- Program Updates
- Fiscal Updates
- IPRO Site Monitoring



#### **NYSFPP Staff**





### **NYSFPP Staff**

- Program Staff:
  - Rae Ann Augliera, Director, Family Planning Program rae.augliera@health.ny.gov
  - Kallyn Alexander <u>kallyn.alexander@health.ny.gov</u>
  - Karen Barrett <u>karen.barrett@health.ny.gov</u>
  - Meaghan Carroll <u>meaghan.carroll@health.ny.gov</u>
  - Bernadette Dolen <u>bernadette.dolen@health.gov</u>
  - Nicole Furman <u>nicole.furman@health.ny.gov</u>
  - Nevillene White <u>nevillene.white@health.ny.gov</u>



### **NYSFPP Staff**

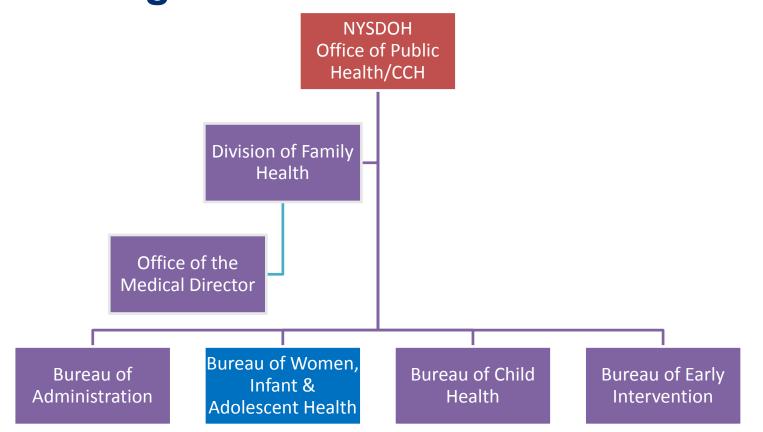
- Data Staff:
  - Eileen Shields, Director Data Analysis, Research& Surveillance eileen.shields@health.ny.gov
  - Victoria VanHoesen <u>victoria.vanhoesen@health.ny.gov</u>
- Fiscal Staff:
  - Marlena Cummins <u>marlena.cummins@health.ny.gov</u>



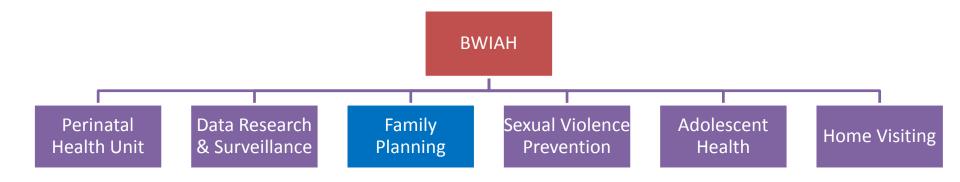
# Division of Family Health – Priorities & Focus Areas

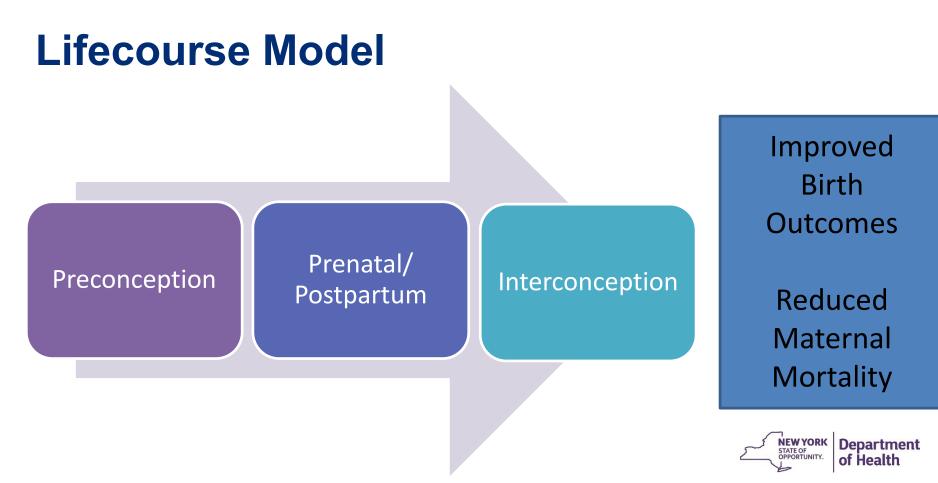


#### **NYSDOH Organizational Chart**



#### **NYSDOH Organizational Chart**





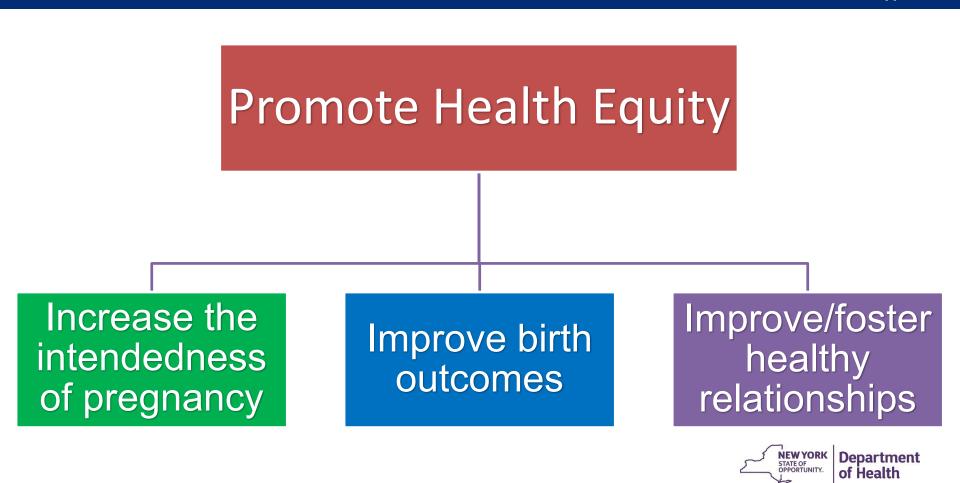
#### Pregnancy-related Maternal Mortality (n=59) 2012-2013 Preliminary Data

88% of pregnancy-related deaths had prenatally identified risk factors

Prenatally identified risk factors*	88%
Hypertension	15% (n=9)
Anemia	12% (n=7)
Asthma	12% (n=7)
Psychiatric disorders	12% (n=7)
Cardiac problems	12% (n=7)
Uterine abnormality or incompetent cervix	10% (n=6)

\*Factors identified in less than 6 women not presented.

Pre-pregnancy weight status		
Obesity, BMI>=30	34% (n=20)	
Overweight, BMI between 25 and 30	12% (n=7)	
Smoking prior to pregnancy	12%	
Alcohol use prior to pregnancy	12%	
Drug use prior to pregnancy	14%	
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#### **NYSDOH Commissioner's Listening Sessions**



- Focus on maternal health
- Seven locations across NYS
- Family Planning services and access
- Maternal Mortality Task Force
- Recommendations
- Replication



#### **Family Planning is Preventive Care**

- Half of all uninsured women rely on FP clinics as their <u>only</u> source of medical care
- FP services offers an opportunity to help clients achieve optimum overall health
- Improving overall health and helping clients plan pregnancy can improve birth outcomes

FIGURE 1. Family planning and related and other preventive health services



# NYS Family Planning Program Overview & Impact



# **NYS Family Planning Program**

- Family Planning Provider Network consists of:
  - 48 Article 28 facilities that operate 173 family planning service sites
- Family Planning Providers include:
  - NYC Health & Hospitals Corporation Facilities (10)
  - Planned Parenthood Affiliates (9)
  - Local Health Departments (8)
  - Federally Qualified Health Centers (7)
  - Hospital Operated Clinics (6)
  - Teen Focused Health Centers (3)
  - Other Facilities (5)



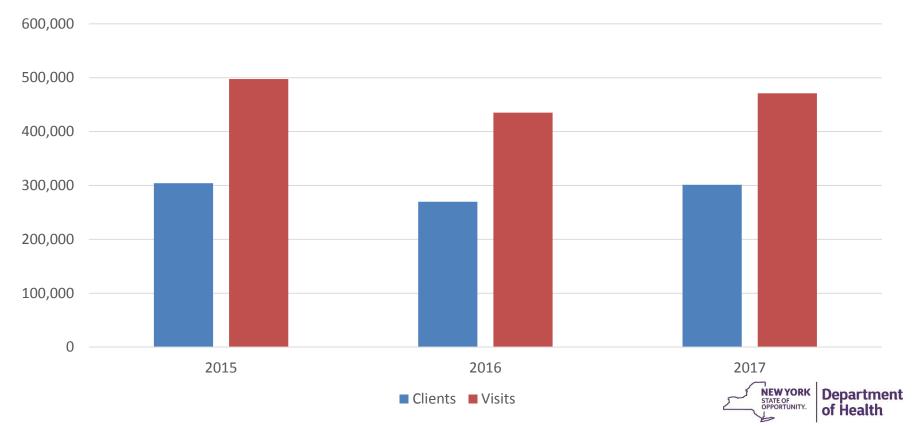
### **Family Planning Program Impact**

#### 2017 Family Planning Annual Report

- 301,128 unduplicated clients
  - 89.4% female
  - o 10.6% male
  - 16.4% adolescents
- 470,973 total visits
- 67% at or below 100% FPL



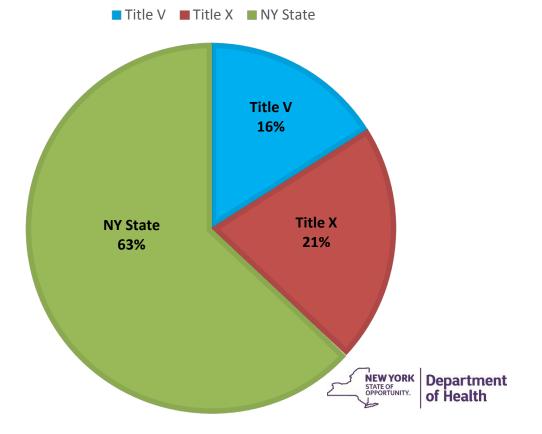
#### **Clients/Visits Over Time**



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### **Strong Investment in Family Planning**

 NYS contributes the majority of our program's funding



# Unique Components of the NYS FPP Include:

- Family Planning Benefit Program and FPBP Coordinators
- Standard NYS FPP workplan
- Chlamydia/HIV testing and counseling free for anyone at or below 200% FPL
- Annual review of schedule of discounts
- Performance Measure Initiatives
- Site Monitoring conducted by IPRO
- NYS Family Planning Training Center



### **Things to Consider**

- How your agency data compares to statewide program data
  - QIR report available in Ahlers
- Possible CQI projects
- Technical Assistance from NYS Family Planning Training Center and NYSDOH
- Learning Collaborative Opportunities



#### **Title X Updates**



### **Title X Grant Award**

- Funded for period September 1, 2018 through March 31, 2019
- FY 2018 Program Priorities







### **Title X FY 2018 Program Priorities**

- Available on HHS website at:
  - <u>https://www.hhs.gov/opa/title-x-family-planning/about-title-x-grants/program-priorities/index.html</u>





1. Efficient & Effective Program Management	2. Management and Decision-Making and Accountability for Outcomes	3. Cooperation with community and faith based organizations
<ol> <li>Meaningful collaboration with subrecipients and documented partners</li> </ol>	5. Education & Counseling on Healthy Relationships & Avoiding Sexual Risk/Returning to a Sexually Risk Free Status	6. Sexual Risk Avoidance for Adolescents

#### 7. Voluntary Services

8. Data Collection & Performance Management



### **Program Updates**



#### **2018 Review & Reminders**

- OPA Database Updates
  - Responsibility of subrecipient agency
  - Used to verify 340B eligibility
- Notification of Changes in Programs/Service Sites
- Annual Report
  - Request forthcoming, due in January 2019
- CVR Updates
  - Emailed 10/15/18



### **Upcoming in 2019**

- NYS FPP Program Manual & Training Guidance
- Contract Extension Documents
- BWIAH Joint Provider Day May 2019
  - Integration into Well-Woman Care
- NYSDOH Contract Manager Site Visits
- IPRO Site Monitoring Visits Completed



#### **Fiscal Updates**





# **Division of Family Health Bureau of Administration**

DFH.BOA@health.ny.gov

(518) 473-4441

#### **General Reminders on Claims**

- Claims are due 30 days after the end of each quarter. (i.e. 7/1/18 9/30/18 due 10/30/18)
- The following documentation **must** be included with your claim:
  - Claim for Payment form (AC3253-S)
  - Budget Statement and Report of Expenditures (BSROE)
  - Expenditure and Revenue Report
- All claims are to be signed and submitted electronically to: <u>DFH.BOA@health.ny.gov</u>
- Subject line should contain the following information: Contract # / Organization / Claim Period / Program Name / Indicate Claim Type (i.e. Q1, Supplemental, Advance, or FINAL)

#### C12345GG / ABC Company / Family Planning / 7/1-9/30/18 / Q3



#### **2019 Contract Period**

- Contracts are in place through December 31, 2019.
- Advance payment up to 25% of the 2019 budget value may be requested by submitting a claim to <u>DFH.BOA@health.ny.gov</u> prior to <u>January 1, 2019</u>.
   \*Advance claims cannot be paid until after the start of the budget period (January 1<sup>st</sup>).
- The approved 2019 budget can be found in the executed contract. A budget modification request must be submitted if changes are required.
- Budget modification requests must be submitted to <u>DFH.BOA@health.ny.gov</u> for review. Please use the following naming convention in the subject line on budget modification request emails: Contract # / Organization / Program Name / Budget Period / Bud Mod.

#### C12345GG / ABC Company / Family Planning / 2019 / Bud Mod



#### **Forms**

All forms are available upon written request to <u>DFH.BOA@health.ny.gov</u>. Please use the following naming convention in the subject line on emails: Contract # / Organization / Program Name / Budget Period / Request Type.

#### C12345GG / ABC Company / Family Planning / 2019 / Form Request

- The following forms will contain prepopulated information:
  - Budget Statement and Report of Expenditure (BSROE)
    - · Contains current approved budget and prior period expenditures
  - Budget Modification Request
    - Contains current approved budget



#### **Supporting Documentation**

- Although supporting documentation is NOT required at the time of claim submission, you may be requested to provide appropriate supporting documentation at any time for any or all of the expenses included on the claim.
- The Division of Family Health, Bureau of Administration performs routine claim traces and OSC performs audits on some claims prior to approval.
- In general we are looking for:
  - Proof the expense was incurred (i.e. payroll records/invoices/bills/purchase orders),
  - Proof the expense was paid (cancelled checks (front and back) or copies of bank statements to demonstrate electronic funds transfers),
  - Documentation of how the expense was allocated to this contract (i.e. check request form demonstrating how the expense was allocated). Other proof of allocation is also acceptable, and
  - If "Out-of-State" Travel costs are claimed, proof that prior approval was obtained.



#### **IPRO Site Monitoring**



### **Site Monitoring Process**

- IPRO conducts site monitoring reviews on behalf of NYSDOH
  - Reviews completed from July 2017 to September 2018
    - 39 Subrecipient Agencies
    - 56 Service Sites
- Review includes:
  - Pre-review submissions, on-site observations, staff interviews, and document review
  - DOH contract staff conduct Desk Audit of fiscal, data, and administrative indicators

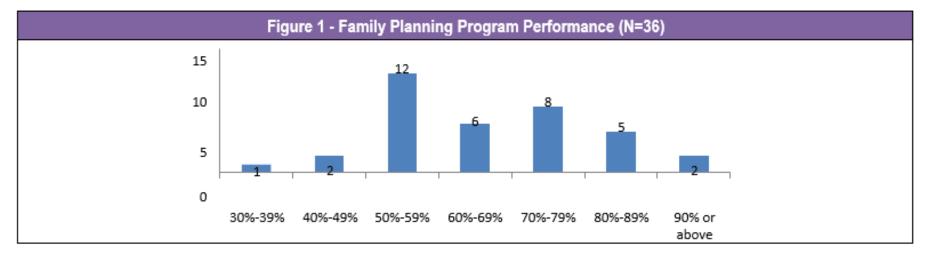


# **Site Monitoring Process**

- IPRO issues monitoring report, detailing all findings from site review
  - Immediate Action Reports issued if IPRO identifies major finding, especially related to health and safety
- Provider has 45 days to submit Corrective Action Plan (CAP)
- DOH reviews/requests revisions and/or approves CAP
- Provider implements changes outlined in CAP
  - This may require ongoing updates to DOH demonstrating CAP has been implemented



- Range of scores: 38% to 100% (average 67%)
- Summary of reviews conducted from 7/1/17 6/30/18





- Average Scores by Provider Type
  - Provider group discussion tomorrow

Figure 2 - Family Planning Reviews Completed, by Program Type (N=36)

Program Type	# Site Reviewed	Average Score	% CAPS Passing First Screen
Federally Qualified Health Center (FQHC)	7	59%	29%
Hospital Operated (HO - excluding NYC H&H)	7	75%	83%
Local Health Department (LHD)	7	57%	60%
New York City Health & Hospitals (NYC H&H)	4	60%	67%
Planned Parenthood (PP)	6	83%	40%
Teen Focused (TF)	2	82%	100%
Other (O)	3	55%	67%

(July 1, 2017 – June 30, 2018)

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Top 5 Findings Most Frequently Assessed as "Not Met"

Figure 3 - Five Findings Most Frequently Assessed Not Met (N=36)				
Indicator Criteria	% Not Met			
Determination of waived fees made by site director (6a)	96%			
Staff have been trained in pregnancy counseling (22h)	69%			
Staff have been trained in Providing QFP Services (19a)	67%			
Adolescents are counseled on resisting coercion (23b)	67%			
Pregnant clients are assessed re: social supports (22c)	66%			

(July 1, 2017 – June 30, 2018)

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### **Indicator Detail:**

6a) Determination of waived fees made by the *site director* and the determination is documented and that the client is informed of the determination

### (Title X Program Requirement 8.4.3).

- Five common findings associated with this indicator:
  - No documentation at all
  - No documentation that the client was informed
  - Decision made by registration staff
  - Decision made by finance or billing staff
  - Other



### **Corrective Action Plans (CAPs)**

- CAP submission and review process
  - Each indicator not met/finding requires its own CAP
- CAP components most frequently missing or not complete:
  - Staff Training & TA plans
  - Policies & Procedures
  - Documentation
  - Follow Up



Figure 3 - Five Findings Assessed Met in 100% of Site Reviews

#### **Indicator Criteria**

Upon interview, select staff did demonstrate an understanding of the principles of client-centered care and quality counseling (1c)

Observation did demonstrate that clinic procedures protect client privacy (15a)

Documentation did demonstrate that a referral directory of health care providers is maintained for services determined to be necessary but beyond the scope of the project (18b)

Projects must have written policies in place that address legislative mandates, including policies stating that minors are provided counseling on how to resist attempts to coerce them into engaging in sexual activity (37a23) Project provides an opportunity for participation in development of a community engagement plan by persons broadly representative of the populations to be served (38h)



(July 1, 2017 – June 30, 2018)

### **Successes**

- Over 35 indicators were met 100% during site reviews
- Strengths and similarities identified by provider type
- Encourage sharing/collaboration of successes



### **Contact Information**

# Family Planning Program mailbox: <u>bwhfpp@health.ny.gov</u>





### **NYS Family Planning Program**

### **Data Trends and Other Related Information**

Eileen Shields & Victoria VanHoesen

November 14, 2018

### **Data Trends and Issues Contents**

- Five-Year Trends for 2013 2017
- Review of Changes in the CVR for 2019
- Review of Family Planning Encounter Definition
- Updates



# Five-Year Trends for 2013 – 2017

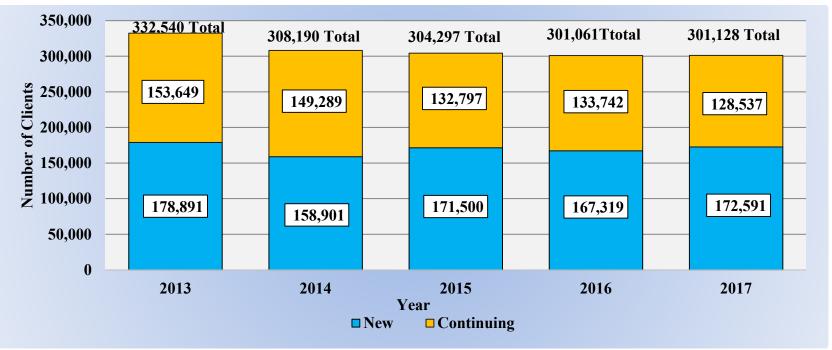


#### NYS Family Planning Program <u>Number of Clients Served and Visits by Year</u> 2013-2017



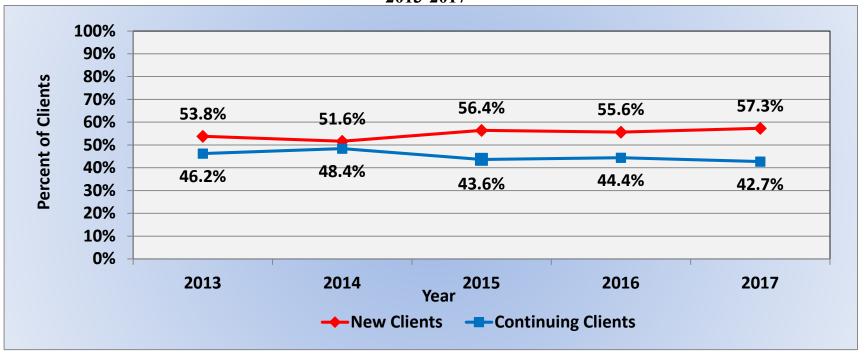


#### NYS Family Planning Program <u>Unduplicated Number of Clients Served</u> by Year 2013-2017



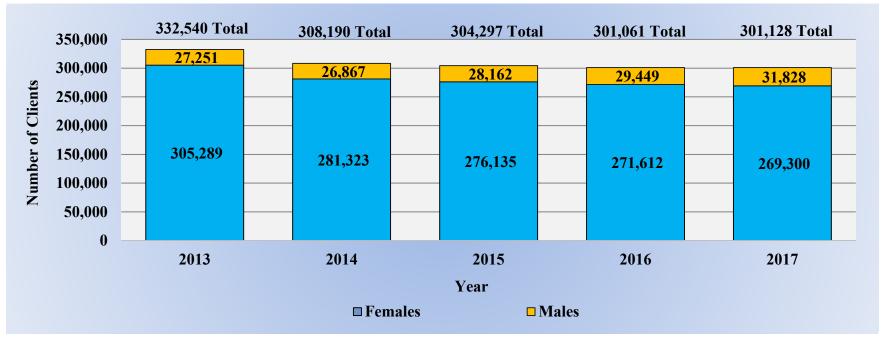


#### NYS Family Planning Program <u>Type of Clients Served by Year</u> 2013-2017



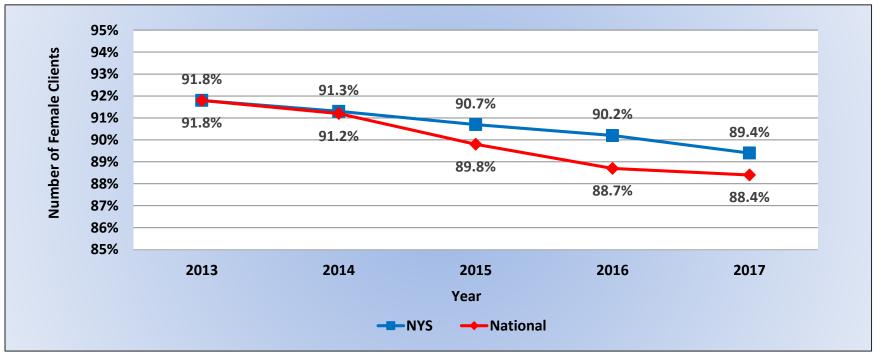


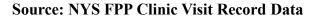
#### NYS Family Planning Program <u>Number of Clients Served</u> by Gender by Year 2013-2017



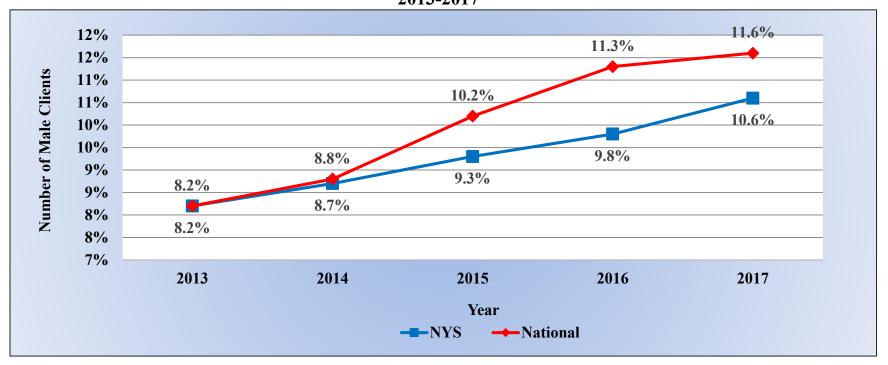


#### NYS Family Planning Program <u>Female Clients Served by Year</u> 2013-2017



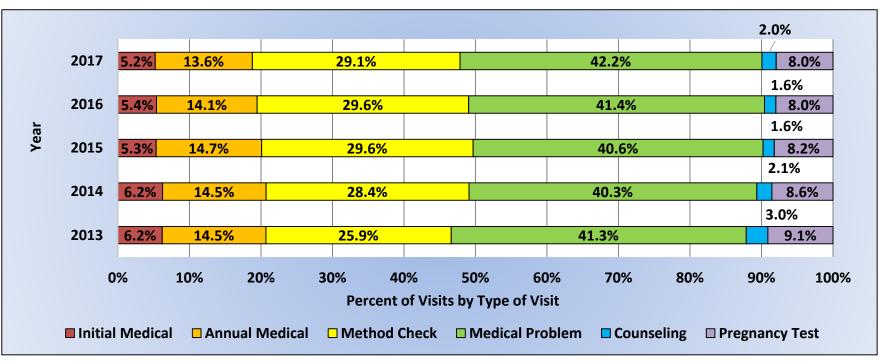






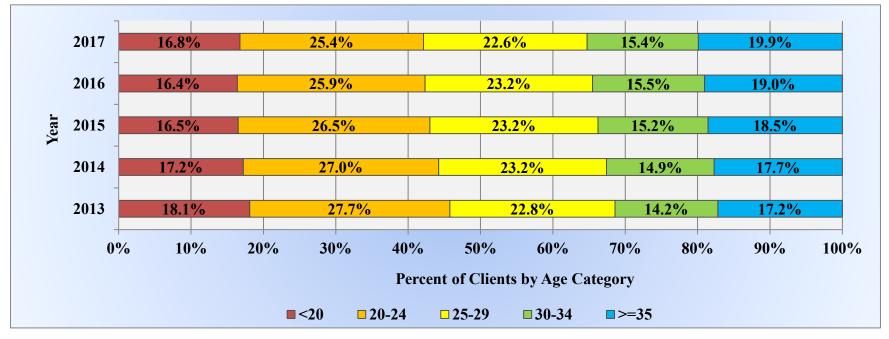


#### NYS Family Planning Program <u>Client Visits by Type by Year</u> 2013-2017



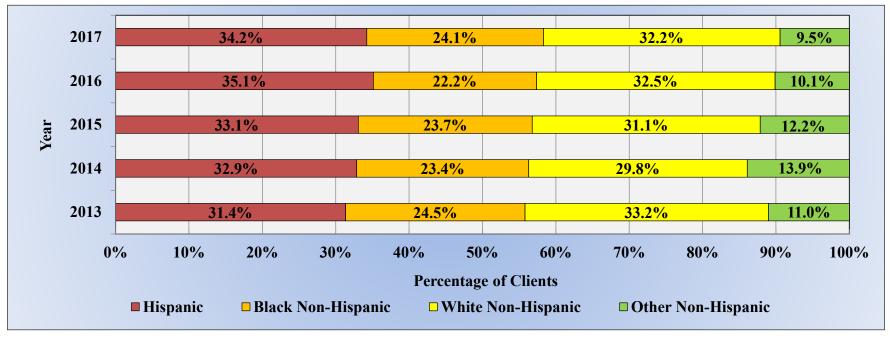


#### NYS Family Planning Program Percentage of <u>Clients Served</u> <u>by Age Category by Year</u> 2013-2017





#### NYS Family Planning Program Percentage of <u>Clients Served</u> <u>by Race/Ethnicity by Year</u> 2013-2017

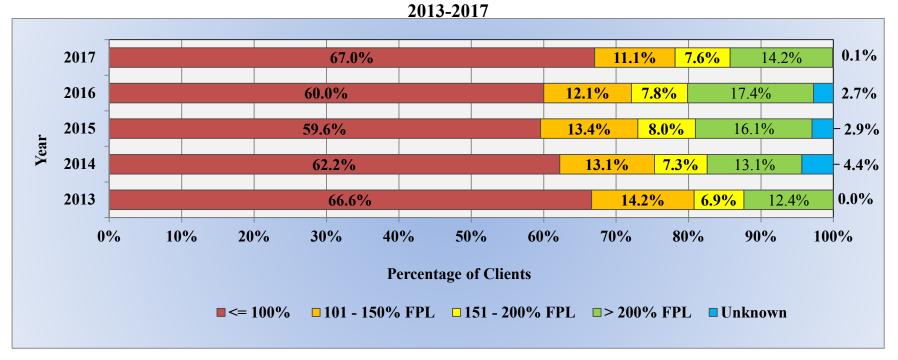


Non-Hispanic Other includes Asians, Alaskan Natives, Hawaiian and other Pacific Islanders, those of multiple races, and those with unknown or unreported races.

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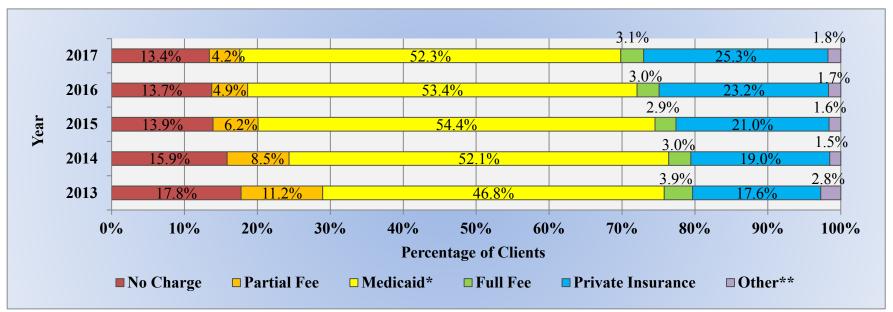
#### NYS Family Planning Program <u>Percentage of Clients by Federal Poverty Level (FPL)</u> by Year





#### NYS Family Planning Program <u>Percentage of Clients by Source of Payment</u> by Year

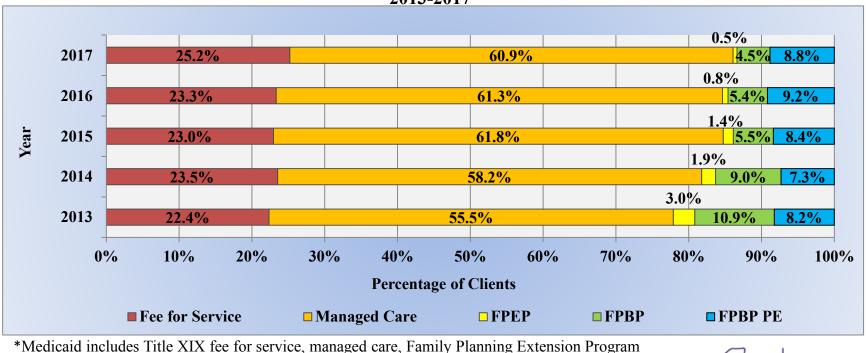
2013-2017



\*Medicaid includes Title XIX Fee for Service and Managed Care, Family Planning Extension Program (FPEP), Family Planning Benefit Program (FPBP), and FPBP Presumptive Eligibility (PE). \*\*Other includes Medicare and other government



#### NYS Family Planning Program <u>Percentage of Clients by Medicaid\* Coverage Type</u> by Year 2013-2017



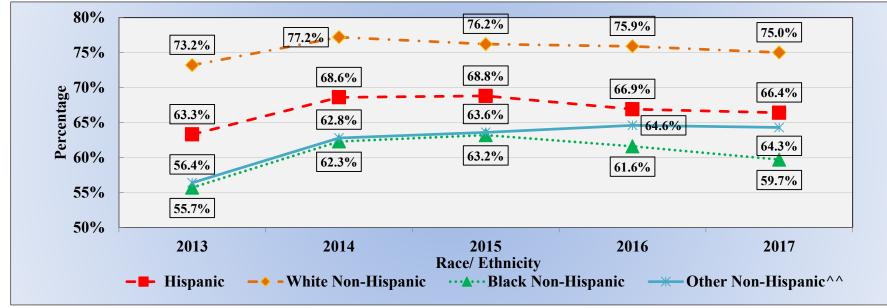
\*Medicaid includes Title XIX fee for service, managed care, Family Planning Extension Program (FPEP), Family Planning Benefit Program (FPBP), and FPBP Presumptive Eligibility (PE).

Source: NYS FPP Clinic Visit Record Data



NYS Family Planning Program <u>Percentage of Female Clients Leaving with Effective\* Contraceptives^</u> by Race/Ethnicity by Year

#### 2013-2017



\* ORAL, HORMONAL INJECTION, IMPLANT, IUD, HORMONAL PATCH, VAGINAL RING OR STERILIZATION

^ CLIENTS USING NO CONTRACEPTIVE METHOD DUE TO INFERTILITY, PREGNANCY, OR SEEKING PREGNANCY ARE EXCLUDED FROM PERCENTAGE DENOMINATORS

^^ AMERICAN INDIAN, ALASKAN NATIVE, ASIAN, PACIFIC ISLANDER/HAWAIIAN NATIVE, OTHER, MULTI-RACIAL

Source: NYS FPP Clinic Visit Record Data

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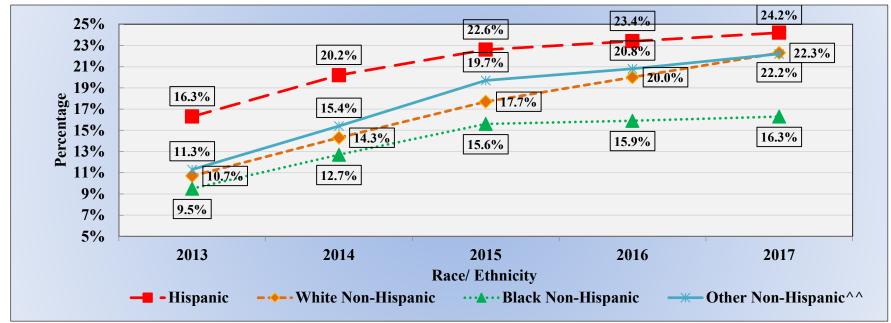
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#### NYS Family Planning Program <u>Percentage of Female Clients Leaving with Highly Effective\*\* Contraceptives^</u> by Race/Ethnicity by Year





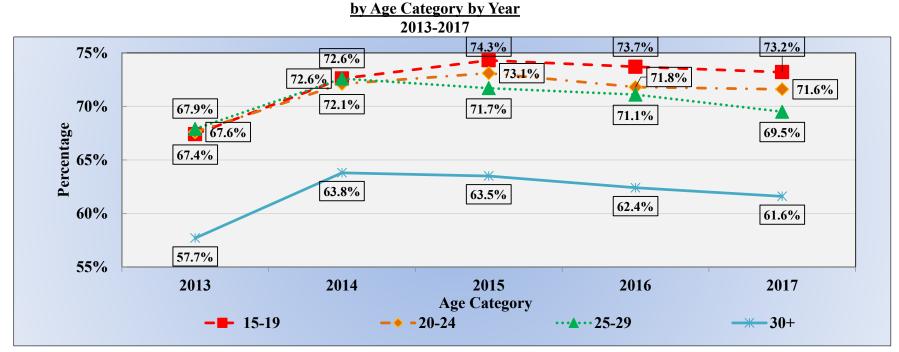
\*\* IUD OR IMPLANT

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NYS Family Planning Program Percentage of Female Clients Leaving with Effective\* Contraceptives^



\* ORAL, HORMONAL INJECTION, IMPLANT, IUD, HORMONAL PATCH, VAGINAL RING OR STERILIZATION

^ CLIENTS USING NO CONTRACEPTIVE METHOD DUE TO INFERTILITY, PREGNANCY, OR SEEKING PREGNANCY ARE EXCLUDED FROM PERCENTAGE DENOMINATORS

Source: NYS FPP Clinic Visit Record Data

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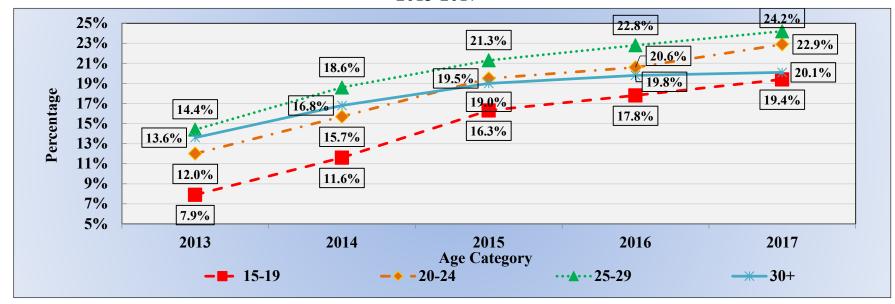
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### NYS Family Planning Program <u>Percentage of Female Clients Leaving with Highly Effective\*\* Contraceptives^</u>

by Age Category by Year 2013-2017



\*\* IUD OR IMPLANT, IUD

^ CLIENTS USING NO CONTRACEPTIVE METHOD DUE TO INFERTILITY, PREGNANCY, OR SEEKING PREGNANCY ARE EXCLUDED FROM PERCENTAGE DENOMINATORS

Source: NYS FPP Clinic Visit Record Data

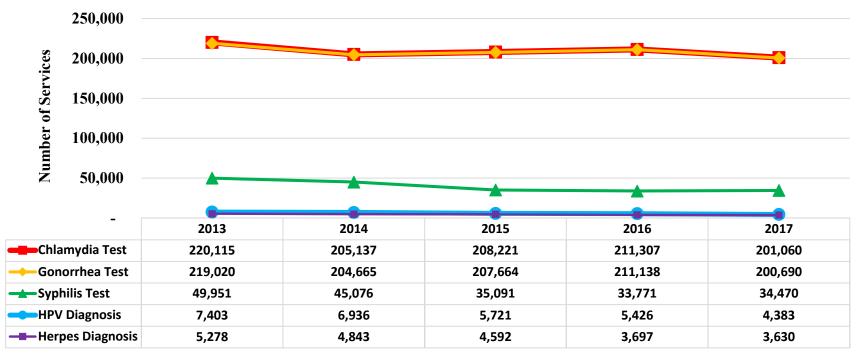
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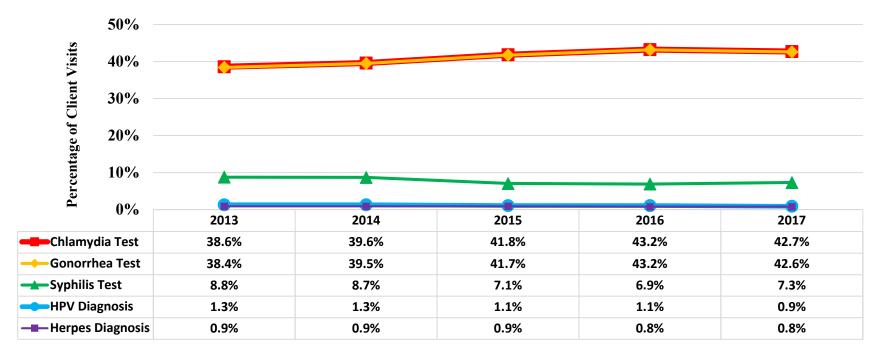
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#### NYS Family Planning Program Number of Client Visits with STD Services by Client Visit 2013-2017





#### NYS Family Planning Program Percentage of STD Services per Client Visit 2013-2017



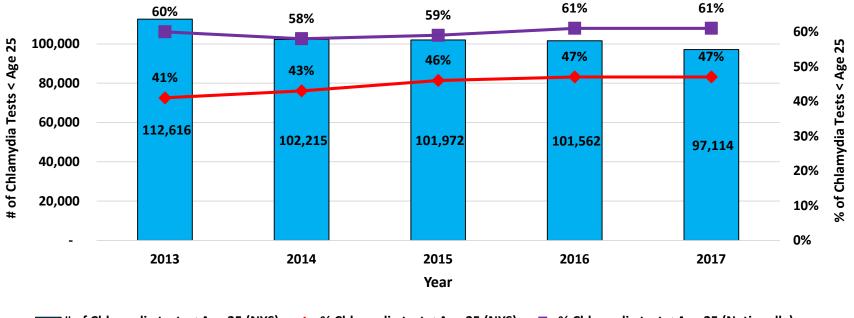


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#### NYS Family Planning Program Number and Percentage of Chlamydia Tests for Client Visits Under Age 25 2013-2017



🛿 # of Chlamydia tests < Age 25 (NYS) 🛛 🛶 % Chlamydia test < Age 25 (NYS) 🚽 🥌 % Chlamydia test < Age 25 (Nationally)

#### NYS Family Planning Program <u>Number of HIV Services per Client Visit</u> 2013-2017

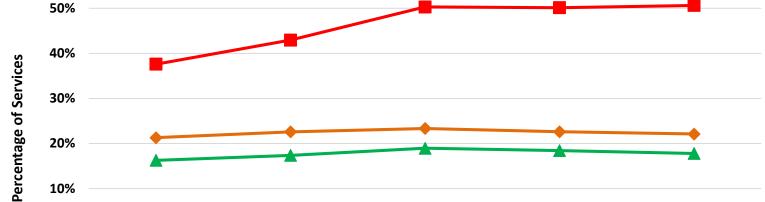


-	2013	2014	2015	2016	2017
HIV Pretest Counseling	214,440	222,525	250,191	245,143	238,447
HIV Test	121,459	117,093	116,116	110,561	104,137
HIV Posttest Counseling	92,830	90,052	94,366	90,244	83,893



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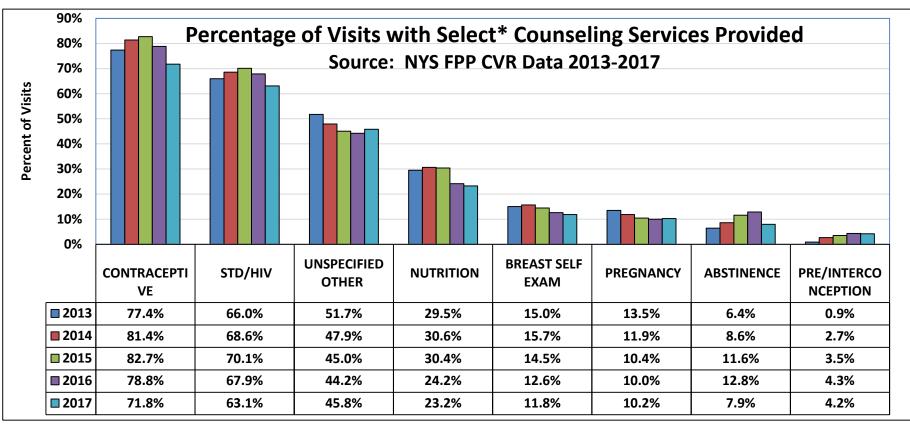




0%					
076	2013	2014	2015	2016	2017
HIV Pretest Counseling	37.6%	42.9%	50.3%	50.1%	50.6%
HIV Test	21.3%	22.6%	23.3%	22.6%	22.1%
HIV Posttest Counseling	16.3%	17.4%	19.0%	18.5%	17.8%

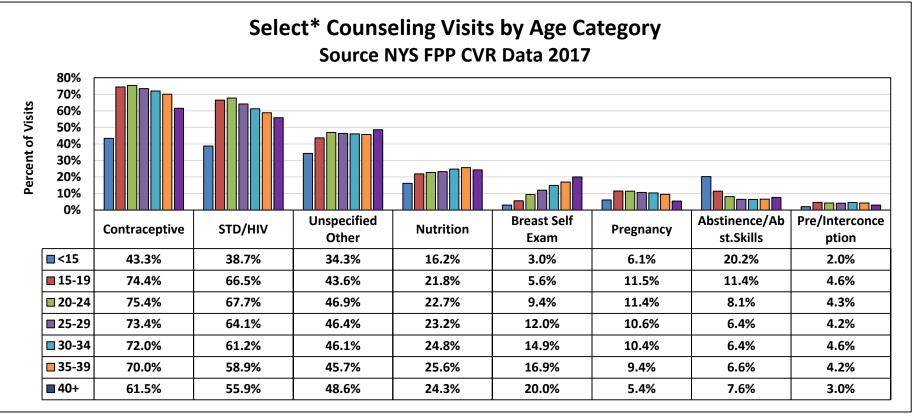






\*Excludes counseling for WIC, infertility and sterilization which were 1% or less in each year





\*Excludes counseling for WIC, infertility and sterilization which were <1% for all ages



# **Pre/Interconception Care**

- Key Components (QFP 2014):
  - Reproductive Life Plan\*
     Medical History\*
  - Sexual health assessment\* Intimate Partner Violence
  - Alcohol & Other Drug Use Tobacco Use\*
  - Immunizations
  - Depression
  - Blood Pressure\*

- Folic Acid
- Height, Weight, & Body Mass Index\*
- Diabetes





# Review of Changes in the CVR for 2019



#### 2019 Clinic Visit Record (CVR) Changes

COMPLETE AT FIRST VISIT, UPDATE	FOR CHANGES AND A	T ANNUAL EXAM	CLINIC NO.			
CLIENT       NUMBER         I   DATE (		SEX	F M CONTACT ST	ATUS		
NAME	FIRST	PHONE	C	OUNTY		
ADDRESS	CITY MONTHLY	m.i.	ST ZII			
PREGNANCIESBIRTHS RACE (check all applicable) 3. American Indian	INCOME ANOTHER SOURCE OF 1 □ 6. Other	HEALTHCARE Y N STUDENT STATUS	_ FAMILY SIZE	(optional)		
1. White     4. Alaskan Native     2. Black / Afr. American     5. Asian HISPANIC     Yes     No/Unknown COMPLETE AT EACH VISIT	7. Pacific Islander / Hawaiian Native		art Time 🗌 No Highest (	Grade Completed		
3. VISIT DATE2_0 8. PURPOSE OF VISIT (Check One) 1-Initial Medical Exam 3-Method Check/Mair C-Annual Medical Exam 6-Medical Problem/Fc		Exam Procedures □ 02-Pap Smear	ES PROVIDED (Check All Ap	plicable) Lab Services □ 31-Hgb / Hct □ 32-Urine Dipstick		
04 - Private Insurance 02 - Title XIX (Medicaid)	12 - Medicare 05 - Full Fee (100% of Scale) 06 - Partial Fee 07 - Other	04-Hgt./Wgt. 05-Thyroid Palp. 06-Heart/Lung Ausc. 07-Breast Exam 08-Abdominal Palp. 09-Extremities	23-Method Initiation 46-Method Cessation 27-Colposcopy 47-Cryosurgery 29-Postpartum Check 30-Other Medical 48-Emergency Contraception 49-HPV Vaccine	33-Urinalysis     33-Urinalysis     34-Urine Culture     35-Repeat Pap Smeai     38-Wet Mount/ Gram Stain     40-Rubella Screen     42-Sickle Cell Screen     44-Other Lab		
5A. IF PRIVATE INSURANCE, IS PRIMARY CARE	COVERED?					
9. CONTRACEPTIVE METHODS (Two May Be Co           02 - Oral         04 - Diaphragm           21 - Oral - Extend. Cycle         05 - Condom           14 - Hormonal Inj 3 mo.         06 - Spermicide	ded) 20 - Abstinence 13 - Cervical cap 15. Female Condom	12A.COUNSELING SEF 01-Contraceptive 02-Sterilization 03-Infertility		12 - Breast Self Exam 07 - Other		
11 - Implant 08 - NFP/FAM 03 - IUD/IUS 22 - LAM	01. Sterilization 09. Withdrawal/Other	<ul> <li>04-Nutrition</li> <li>05-Pregnancy</li> </ul>	11-Abstinence/ Abstinence Skills	Engagement		Depart

#### 2019 CVR Change Descriptions

- Hispanic Field "No" changed to "No/Unknown"
  - To better accommodate instances when clients do not know or decline to respond concerning their Hispanic ethnicity.
- Box 12A Counseling Services Item 13-Family Engagement Added
  - To document efforts in line with the federal Title X legislative mandate to:
    - Encourage family participation in the decision of minors to seek family planning services, and
    - Provide counseling to minors on how to resist attempts to coerce minors into engaging in sexual activities.



#### **Guidance for Coding Sex on the CVR**

For purposes of reporting visit data to the NYS Family Planning Program, client sex should be coded on the CVR to correspond with their reproductive health service needs, in particular their medical services and contraceptive methods.



# Review of Family Planning Encounter Definition



# Title X Definitions\*:

#### Family Planning Users & Encounters

- A Family Planning Encounter is a face-to-face, documented encounter between a family planning client and a provider that takes place in a Title X service site
- Laboratory tests and related counseling and education, in and of themselves, do not constitute a family planning encounter unless there is face-to-face contact between the client and provider, the provider documents the encounter in the client's record, and the tests are accompanied by family planning counseling and education



# Title X Definitions\*: Family Planning Users & Encounters

 If a client is an ongoing family planning user who visits the service site to obtain any type of family planning or related preventive health services, the encounter is considered a family planning encounter and the client is considered a family planning user.



#### Title X Definitions\*: Family Planning Users & Encounters

If a client of reproductive age is sterilized under the service site's Title X-funded project, or is an ongoing Title X user who was sterilized elsewhere but continues to receive gynecological or related preventive health services from the site, the encounter is considered a family planning encounter and the agency may continue to count the client as a family planning user.



#### Title X Client/Encounter Definition\*: Exceptions

- If a post-menopausal client obtains gynecological or related preventive health services, the encounter is <u>not</u> a family planning encounter and the client is <u>not</u> a family planning user.
- If a client is not an ongoing family planning user and obtains a service that does <u>not</u> include counseling, education, or clinical services related to achieving intended pregnancy or avoiding unintended pregnancy, the encounter is <u>not</u> a family planning encounter and the client is <u>not</u> a family planning user.



## Title X Client/Encounter Definition\*: Exceptions

**Example 1:** A new client who receives STD services, but no counseling, education, or clinical services aimed at avoiding an unintended pregnancy or achieving an intended pregnancy, is <u>not</u> a family planning user, and the encounter is <u>not</u> a family planning encounter.



# Title X Client/Encounter Definition\*: Exceptions

**Example 2:** If, in addition to STD testing, this same client receives condoms or counseling about using condoms to prevent STD transmission, but does not receive counseling, education, or clinical services aimed at avoiding an unintended pregnancy, the client is <u>not</u> a family planning user and the encounter is <u>not</u> a family planning encounter.



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#### Title X Client/Encounter Definition\*: Exceptions

**Example 3:** If, in addition to STD testing, this same client receives condoms or counseling about using condoms to prevent STD transmission AND counseling and education aimed at avoiding an unintended pregnancy, the <u>client is a family planning user</u> and the <u>encounter is a family planning encounter</u>.



# Updates



#### Updates

- Documentation:
  - We are updating the data manual and the training documentation, which will be posted on the Ahlers' website.
  - The training documentation will include instructions for the Client/Visit Quality Improvement Report (QIR), which allows agencies to compare their own performance indicators with statewide measures for two periods, all in one report.
- FPAR:
  - Instructions and Tables will be forthcoming at the end of this month, and will be due as usual by the end of December.
  - Please make sure your CVR data is up to date.



#### Contacts

#### NYS Family Planning Program Phone: 518-474-3368 Email: <u>bwhfpp@health.ny.gov</u>

Program Director Rae Ann Augliera: <u>Rae.Augliera@health.ny.gov</u>

Data Director: Eileen Shields: <u>Eileen.Shields@health.ny.gov</u>

