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of Health

NYSFPP POLICY AND PROCEDURE GUIDANCE UPDATES 2026

BRITTANY DEWITT, MPH | NYSFPP UNIT DIRECTOR

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HOUSEKEEPING

- All callers are placed on mute
- Introduce yourself in the chat
- Type your questions into the chat
- Submit follow up questions to your Program Manager
- Slides and recording of this meeting will be sent to participants and uploaded to the NYSFPTC Website

AGENDA

- Brief Introduction to the Policy and Procedure Guidance
- Walk through the 2026 updates
- Q&A

INTRODUCTION TO POLICY MANUAL



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POLICY AND PROCEDURE GUIDANCE

- Guidance is intended for use by all contracted family planning agencies and their subcontractors
- NYSFPP subrecipients are required to have written policies and procedures in accordance with NYSFPP requirements and Title X statutes and regulations.
- This document is meant to provide subrecipients with guidance and strategies to maintain compliance with program requirements.
- The Policy and Procedure Guidance is also available online at <https://nysfptraining.org/>

If this guidance does not answer a question or concern, or if contractors have suggestions for additional information that might be included in the guidance, please contact your program manager.

1.1 General Administration

Subrecipients are accountable to NYSFPP for their performance on the project, the appropriate expenditure of grant funds, and all other obligations articulated in their award and contractual agreements.

Effective Date	1/1/2022
Revision Date	n/a
References	HHS Grants Policy ; NYS Master Contract ; NYSFPP RFA (under FPP General Program tab) ; 2024 Title X Handbook

Procedure:

- Subrecipients must be in compliance with the following, but not limited to:
 - Prohibiting discrimination based on race, color, or national origin
 - Prohibiting discrimination based on handicap
 - Prohibiting discrimination based on age
 - Prohibiting discrimination on the basis of sex (Title IX of the Education Amendments of 1972)
- In addition, assurance must be in place that subrecipients have:
 - Institutional, managerial, and financial capability to ensure proper planning, management and completion of the project as described in the award
 - Provide NYSFPP with free access to examine all records, books, papers, and documents related to the award

← Policy language

← Important dates

← Links to useful resources related to the policy

← Procedure: detailed explanation on how to comply with the policy



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POLICY MANUAL ORGANIZATION



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Update

This Policy and Procedure Guidance is intended for use by all NYS Family Planning Program (NYSFPP) subrecipient agencies that contract with the NYS Department of Health (NYSDOH) for Family Planning Program grant funds and their subcontractors. In accepting these funds, subrecipients agree to administer programs that support the NYSFPP mission: providing high-quality family planning services and related preventive health services to individuals, including adolescents, with a focus on priority populations experiencing inequitable health outcomes.

This document outlines required policies, along with example procedures and best practices, to support compliance with program expectations established by Title X and the NYSFPP.

Updates to this guidance will be shared with all subrecipient agencies. Unless otherwise noted, compliance with revised policies is expected within 90 days of notification from NYSDOH. Subrecipients are responsible for ensuring that staff are informed of and trained on policy updates, as appropriate. Agencies should also review their internal policies at least annually and more frequently as needed to ensure alignment with this guidance document.

To make this manual easier to use, policies are organized into program expectation categories, each identified by a color code. A quick reference guide is available in Appendix A: Program Expectation Categories and Policy Crosswalk. The categories include:

- Administrative and Financial Management
- Program Policies and Approach
- Personnel Management and Staff Training
- Clinical Services, Care Standards, and Continuous Quality Improvement
- Data Collection, Monitoring and Reporting
- Community Engagement

The Policy and Procedure Guidance is also available online at <https://nysfptraining.org/> under the resources tab.

If this guidance does not answer a question or concern, or if subrecipient agencies have suggestions for additional information that might be included in the guidance, please contact your Program Manager or the NYSFPP mailbox bwhfpp@health.ny.gov.

Appendix A: Program Expectation Categories and Policy Crosswalk

This cross walk is designed to help NYSFPP program directors know where to look to learn about a certain topic and can also help with guiding different teams (clinical, finance, community engagement) to the policies that are relevant to their roles. In addition to this outline, we've also color-coded each policy in the guide to match the associated topic.

Administrative and Financial Management

- o **General**
 - 1.1 General Administration
- o **Grant**
 - 1.3 Grants and Contracts for Family Planning Services
 - 1.3.1 Subcontracting
- o **Fiscal**
 - 4.3 340B Drug Pricing Program
 - 5.1 Enrollment in Public Health Insurance Programs
 - 6.1 Financial Management Standards
 - 6.2 Charges, Billing, and Collections
 - 6.3 Determining Fees/Charges
 - 6.4 Assessing Fees
 - 6.5 Third Party Billing
 - 6.6 Budget Submissions
 - 6.7 Budget Modifications
 - 8.4 Financial Audits

Program Policies and Approach

- o **Internal Policies**
 - 1.2 Assurances
 - 1.4 Prohibition of Abortion Related Services
 - 1.5 Conflicts of Interest
 - 1.6 Liability Coverage
 - 1.7 Human Subject Clearance
 - 1.8 Inventions and Discoveries
 - 1.9 Changes in Scope
 - 1.9.1 Opening a Service Site
 - 1.9.2 Change in Service Delivery
 - 1.9.3 Service Site Relocation (Permanent)

1.1 General Administration

Subrecipients are accountable to NYSFPP for their performance on the project, the appropriate expenditure of grant funds, and all other obligations articulated in their award and contractual agreements.

Effective Date	1/1/2022
Revision Date	n/a
References	HHS Grants Policy ; NYS Master Contract ; NYSFPP RFA (under FPP General Program tab) ; 2024 Title X Handbook

Procedure:

- NYSFPP subrecipients must comply with all requirements and obligations as outlined in their NYS contract as well as applicable legislative, regulatory, and administrative requirements described in the US Department of Health and Human Services' Public Health Service Grants Policy Statement.
- NYSFPP subrecipients must develop administrative, management, and organizational systems that meet all Reproductive Health and Family Planning Program State and Federal Title X requirements.

1.9 Changes in Scope

In accordance with NYS Family Planning Program requirements, any subrecipient agency that is planning to close, open, temporarily suspend services, move a service site, change available services or change service site hours of operation must notify the NYSFPP in writing, via a Change in Scope Form response, in advance of the proposed change per guidelines below.

Effective Date	1/1/22
Revision Date	4/1/25
References	NYSFPP RFA (under FPP General Program tab) ; 2024 Title X Program Handbook

Procedure:

- Opening of a new service site, closing a service site and moving a service site, all require subrecipient agencies to notify the Program Manager and bwhfpp@health.ny.gov 90 days prior to implementation. This includes addition and changes to mobile sites. Subrecipient agencies should reach out to their Program Manager to obtain the link to the Change in Scope Form per policies 1.9.1-1.9.5.
- A change in scope of services (changes to days/hours of operation or permanent changes to services offered) requires service sites to notify their Program Manager and bwhfpp@health.ny.gov 30 days prior to implementation for approval. See policy 1.9.2.
- A submitted Change in Scope Form, new Agency Profile and any other required attachments as needed must be submitted per the guidelines outlined in the NYSFPP Guidelines for Service Changes policies. Detailed instructions for each type of service change can be found in policies 1.9.1 -1.9.5
- Subrecipient agencies must report information about service sites and changes in services as required to Program Managers, so the NYSFPP can revise the public facing OPA Title X clinic database (<https://opa-fpclinicdb.hhs.gov/>)
 - o Please note that this database will also be used to verify eligibility for 340B program registration and recertification.

POLICY UPDATES



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POLICY UPDATES

2026 NYSFPP Policy and Procedure Guide Updates

Policy #	Policy Title	Description of Change:
2.5*	Voluntary Services	Updated federal sterilization consent form and procedure guidance for use by grant recipients. The updated federal sterilization form attached to policy must be used for all Title X patients.
6.4*	Assessing Fees	Added new language to procedure section to clearly identify what subrecipient's internal Income Verification policy and procedures should include.
8.1	General Planning and Evaluation	Added clearer guidance on what is needed to ensure program activities are data informed and meet the needs assessment requirement.
9.5	Community Education, Participation and Engagement Plan (CEPE)	Revised to provide clearer guidance on the needs assessment requirement and the submission process for CEPE plans. Additional resources were added to assist subrecipients in developing CEPE plans.
9.6*	Information and Education Advisory Committee	Added more detailed guidance on how to meet policy requirements and reorganized the procedure into three clear sections for improved clarity.

*Policies 2.5, 6.4 and 9.6 were changed in late 2025 and changes were already announced on quarterly calls.

Note: As necessary, all policies' references were updated to reflect current links to resources.

POLICY 8.1: GENERAL PLANNING AND EVALUATION

8.1 General Planning and Evaluation

Subrecipients must have a process in place to assess whether the project is competently and efficiently administered as defined in the annual work plan. This should include the development of goals and objectives for the project period informed by community data and stakeholder feedback and the evaluation of the subrecipient's success at meeting these goals.

Effective Date	1/1/22
Revision Date	5/1/26
References	NYSFPP RFA (under FPP General Program tab)

Now contains three sections with updated guidance:

1. Planning and Goals
2. **Data Informed Program Activities (former Needs Assessment)**
3. Evaluation

POLICY 8.1: GENERAL PLANNING AND EVALUATION CONT.

Procedure:

Planning and Goals: Subrecipients must develop a set of goals for the project. Goals must:

- be clearly stated in writing
- be based on current community data and stakeholder feedback
- have specific objectives that are measurable
- be consistent with Title X requirements
 - Goals should use the frameworks outlined in policies 2.7 and 2.8. This includes the planning, implementation, and evaluation of efforts to increase access to and quality of family planning services for key priority populations.
 - One strategy for establishing measurable goals is using a SMART (Specific, Measurable, Achievable, Realistic, and Time-Oriented) framework.



POLICY 8.1: GENERAL PLANNING AND EVALUATION CONT.

Data Informed Program Activities: Subrecipients should collect/analyze current community data and direct stakeholder feedback to inform program activities

- The subrecipient must create opportunities for people who represent the community and understand its needs to participate in needs assessment for their family planning program.
- Data can include patient feedback, trends in agency, community, regional and state-level data, gaps in service, and other identified program needs. Some examples of data to analyze as part of the community needs assessment are:
 - client data in Ahlers (demographics, clinical outcomes, and other trends)
 - client satisfaction and experience data
 - county-level data for areas served by health centers on sexually transmitted infections pregnancies, vaccines, and other key health indicators
 - survey of local access to family planning services
 - survey of current and potential partnerships with local groups and organizations
 - program evaluation data from subrecipient and regional organizations
 - staff experience surveys and input from staff at all levels of the agency

POLICY 8.1: GENERAL PLANNING AND EVALUATION CONT.

Evaluation

- Subrecipients must institute an evaluation component that identifies indicators for measuring achievement of program goals and objectives
- Evaluations must include measures of impact on key priority populations.
- Subrecipients are encouraged to disaggregate data beyond key priority populations into specific demographic groups to ensure that equity is being assessed and achieved for each subgroup. Disaggregated data can help subrecipients identify disparities and take steps to implement change.
- Evaluation practices must include input from people who represent the community and understand its needs. This often includes agency staff, especially those delivering direct services.
- Subrecipients must perform client satisfaction surveys on a regular basis.
- Subrecipients are encouraged to collect supplemental data to monitor the quality of care and the efficacy of processes, and support quality improvement efforts. After any supplemental data are collected, they should be tabulated, analyzed, and results used to improve quality of care. Examples of supplemental data sources include:
 - review of medical records
 - interviews with clients
 - facility audit
 - direct observation
 - interviews with providers

UPDATE 2: POLICY 9.5

9.5 Community Education, Participation and Engagement (CEPE) Plan

Subrecipients must develop an outreach and education plan that includes a detailed strategy for community participation, including opportunities for community involvement in the development, implementation, and evaluation of the project.

Effective Date	1/1/22
Revision Date	5/1/26
References	NYSFPP RFA (under FPP General Program tab) ; Education and Outreach Guidance (under Implementation Tools tab) ; Community, Education, Participation and Engagement Plan Template ; Title X Program Handbook

Changes include:

- Revised language to reflect when CEPE plans must be submitted
- Revised language to reflect what the intentions were of the required Annual Needs Assessment (data informed activities)
- Additional resources added assist subrecipients in developing their CEPE plan

• CEPE Reporting Requirements

- o CEPE plans must be made available to the NYS Department of Health Family Planning Program when requested
- o Subrecipients must submit annual CEPE reports
- o CEPE updates, activities and outputs must be included on quarterly reports

UPDATE 2: POLICY 9.5 CONT.

- **Data-Informed CEPE Planning and Evaluation**
 - Subrecipients must create an annual CEPE plan that includes goals, objectives, activities, and evaluation plan of community education, participation, and engagement for their program.
 - CEPE plans must include opportunities for people who represent the community and understand its needs to participate in planning, implementation, and evaluating their family planning program.
 - CEPE plans must be updated each year based on data assessing the needs of the communities the agency serves, patient feedback, trends in agency, community, regional and state-level data, gaps in service, and other identified CEPE needs. Some examples of data to analyze as part of the community needs assessment are:
 - Client data in Ahlers (demographics, clinical outcomes, and other trends)
 - Client satisfaction and experience data
 - County-level data for areas served by health centers on sexually transmitted infections, pregnancies, vaccines, and other key health indicators.
 - Survey of local access to family planning services
 - Survey of current and potential partnerships with local groups and organizations
 - Program evaluation data from community-based health education activities
 - Other data that help to develop a plan that enhances community education and outreach strategy
 - CEPE plans should use the frameworks outlined in policies 2.7 and 2.8. This includes planning, implementing, and evaluating outreach CEPE efforts to increase community awareness of and access to family planning services for key priority populations.

QUESTIONS?



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NYS FPP CONTACT INFORMATION



Family Planning Program mailbox: bwhfpp@health.ny.gov

Bureau of Perinatal Reproductive and Sexual Health
(BPRASH) phone number: (518) 474-0535



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