

DIVISION:	FQHC	NUMBER(s):	CHCA-026
PROGRAM:	Family Planning	VERSION:	1.00
TITLE:	Non-Coercive Services	PAGE:	1 of 4
		EFFECTIVE DATE: January XX, 2025	
DESCRIPTION:	Process to ensure compliance with Title X for services provided in Family Planning.	ORIGINATION DATE: January XX, 2025	
APPROVED BY:	<p>Click or tap here to enter text.</p>	REPLACES:	
FQHC CHIEF EXECUTIVE OFFICER:		New	
	Randy Smith, MPA		Date

I. PURPOSE

The purpose of this policy is to describe Southern Nevada Community Health Center's (SNCHC) process for ensuring compliance (including the recipient and service sites, as appropriate) with the expectation that projects provide services without subjecting individuals to any coercion to accept services or to employ or not to employ any particular methods of family planning (42 CFR § 59.5(a)(2)); ensure that acceptance of services is solely on a voluntary basis and may not be made a prerequisite to eligibility for, or receipt of, any other services, assistance from or participation in any other program of the recipient (Sections 1001 and 1007, PHS Act; 42 CFR § 59.5(a)(2)); and ensure that staff are informed that any officer or employee of the United States, officer or employee of any State, political subdivision of a State, or another entity, which administers or supervises the administration of any program receiving federal financial assistance, or person who receives, under any program receiving federal assistance, compensation for services, who coerces or endeavors to coerce any person to undergo an abortion or sterilization procedure by threatening such person with the loss of, or disqualification for the receipt of, any benefit or service under a program receiving federal financial assistance shall be fined not more than \$1,000 or imprisoned for not more than one year, or both. (42 U.S.C. § 300a-8, as set out in 42 CFR § 59.5(a)(2) footnote 1)

II. SCOPE

Applies to all workforce members involved in the delivery of Family Planning services.

III. POLICY

- Services are provided without subjecting individuals to any coercion to accept services or to employ, or not to employ, any particular methods of family planning.
- A general consent form provided to clients states that receipt of family planning services is not a prerequisite to receipt of any other services offered by SNCHC (Attachment A – Informed General Consent for Family Planning Services).
- Services are not made a prerequisite to eligibility for, or receipt of, any other services, assistance from or participation in any other program of the recipient.
- Staff are informed that any officer or employee of the United States, officer or employee of any state, political subdivision of a state, or any other entity, which administers or supervises the administration of any program receiving federal financial assistance, or person who receives, under any program receiving federal assistance, compensation for services, who coerces or endeavors to coerce any person to undergo an abortion or sterilization procedure by threatening such person with the loss of, or disqualification for the receipt of, any benefit or service under a program receiving federal financial assistance shall be fined not more than \$1,000 or imprisoned for not more than one year, or both (Attachment B – Title X Requirements Acknowledgement Form).

IV. PROCEDURE

- A. Initial Visit: During the client's first visit, provide the Informed General Consent Form that includes the following key points:
1. Services are provided without subjecting individuals to any coercion to accept services, or to employ, or not to employ, any particular method. Certain methods such as Long-Acting Reversible Contraceptives, Intra Uterine Contraception (IUC), or Implants will require additional consent.
 2. All services offered at the Southern Nevada Community Health Center are to be provided on a voluntary basis.
 3. Acceptance of Reproductive and Sexual Health Services is not a prerequisite to receive other health services.
 4. Review the form with the client to ensure understanding. Address any questions or concerns.
 5. Obtain the client signature on the form as acknowledgment.

6. Scan the signed form into the client's electronic health record (EHR).
- B. Annual Updates:
 1. During subsequent annual visits, provide the client with the same consent form to reinforce the information, and to account for any changes in their understanding or preferences.
 2. Repeat section A, steps 4-6.
- C. Documentation:
 1. Maintain an up-to-date record of the client's signed consent form in the EHR.
- D. Ongoing Communication:
 1. Ensure all staff are trained to communicate the voluntary nature of Title X Family Planning services when discussing services.
 2. Reinforce to clients during visits or consultations that they are free to decline any services without impacting their ability to receive other care.
- E. Training Requirements for Staff: New Hire Orientation and Annual Training
 1. All new hires must complete Federal Title X Training Requirements as part of their onboarding process and annually. All staff are required to complete annual refresher training on Title X Family Planning services to ensure ongoing compliance and understanding.
 2. Training resources are available on the Reproductive Health National Training Center (RHNTC) website.
 3. New hires must complete and sign the Title X Requirements Acknowledgement form as proof of understanding and compliance with Title X policies. Staff must renew and sign above form to confirm their understanding of the updated policy and Title X requirements. The form is maintained in the staff training binder.
 4. As part of the orientation, new hires are required to review this policy to ensure they fully understand their responsibilities under Title X regulations. During the annual training, staff must review this policy to stay informed about any updates or changes.
- F. Access to Policy:
 1. Staff can access this policy through the following methods:
 - a. Onsite Binders: Physical copies of this policy are stored in designated binders available onsite at each clinic location. Staff should refer to the binder labeled Policies and Procedures for the

[Title]

most recent binders

- b. A digital version of this policy is available on the Neogov Policy Portal. Staff can log into their account to search for this policy.
- G. Review Schedule: This procedure will be reviewed as needed to ensure compliance with Title X regulations and updated as needed based on changes to laws, training requirements, or clinic practices.

V. REFERENCES

Title X Program Handbook, Section 3, Program Administration #1, #2, and #3
(<https://opa.hhs.gov/sites/default/files/2022-08/title-x-program-handbook-july-2022-508-updated.pdf#page=16>)

Sections 1001 and 1007, Public Health Service (PHS) Act
(https://opa.hhs.gov/sites/default/files/2020-07/title-x-statute-attachment-a_0.pdf)

2021 Title X Final Rule (42 CFR § 59.5(a)(2)) (<https://www.ecfr.gov/current/title-42/chapter-I/subchapter-D/part-59#59.5>)

VI. DIRECT RELATED INQUIRIES TO

Community Health Nurse Manager (FQHC)

HISTORY TABLE

Table 1: History

Version/Section	Effective Date	Change Made
Version 0		First issuance

VII. ATTACHMENTS

Attachment A – Informed General Consent for Family Planning Services

Attachment B – Title X Requirements Acknowledgement Form