Community Participation, Education and Project Promotion in Title X Programs

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Community Participation

- Title X Sub-recipient agencies are responsible to maintain an Information and Education (I & E)/ Advisory Committee that follows these Title X requirements:
  - Provide opportunities for participation in program development
  - Provide opportunities for participation in program implementation
  - Provide opportunities for participation in the evaluation of the project
  - Review and approve education materials used in association with program services
Committee Specifics

- **Advisory Council**
  - Hold annual meeting
  - Defined duties (By-Laws/policy):
    - Provide opportunity for community input/participation/development
    - Provide opportunities for evaluation of the project
  - Document meetings and decisions

- **I & E Committee**
  - 5-9 diverse members
  - Hold annual meeting
  - Defined duties (By-Laws/policy)
    - Annually review, approval and documentation of education and program promotion materials
  - Document meetings and documented material approval process
The Information and Education Advisory Committee may serve the community participation function if it meets the requirements or a separate group may be identified.

- 5-9 diverse members
- Defined functions (By-laws/policy)
  - Community participation
  - Program promotion
  - Program evaluation
  - Review and approval of education materials
- Annual meeting with minutes reflective of actions taken
- Documentation of approval of education materials
Committee(s) Composition

- The committee(s) **must** include individuals broadly representative (in terms of demographic factors such as race, color, national origin, handicapped condition, sex, age, sexual orientation) of the population or community the Title X program serves.
  - FP staff may provide administrative and clinical support to the committee, but may not be voting members of the advisory committee.
  - The committee may include professionals who work directly with population groups for which materials are intended, but the priority should be to include client and community members.
  - The agency **must** demonstrate efforts to include members who broadly represent the community served.
  - A roster **must** be maintained that identifies the community or population group represented by each member.
The size of I & E Committee must be made up of five to nine members, except that this size provision may be waived by the Office of Population Affairs (OPA) where a good cause has been shown (42 CFR 59.6(b)(1)).

If an agency wished to request a waiver to the five to nine membership requirement a written request indicating the good cause reasons must be submitted to MDHHS Family Planning Program consultant for review and submission to OPA for approval.
Committee Functions

- **Community Participation**
  - Review the agency program plan (Annual Plan)
  - Discuss accomplishments and suggest future program goals and objectives
  - Discuss where program services are most needed
  - Discuss program promotion – Program Promotion Plan
  - Discuss community education – Community Education Plan

- **Program Evaluation**
  - Review agency work plan goals and objectives
  - Review client satisfaction surveys

Assure that the functions of the committee are listed in by-laws or written policy.
Committee Functions

- **Review and Approval of Education and Program Promotion Materials**
  - MDHHS delegate the I. & E. materials review and approval process to the sub-recipient agencies; however, the oversight responsibility of the I. & E. review process rests with MDHHS as the grantee. MDHHS monitors the committee and review process with the Annual Plan review as part of the on-site comprehensive program review.
  - A written description of the I. & E. Committee review and approval process **must** be included in a policy statement, by-law, or other committee documents made available to members.
  - All information or education materials are distributed to committee members, reviewed and approved (according to established policy/by-law) prior to utilization or distribution to the community.
  - The I. & E. Committee may delegate responsibility for the review of the factual, technical and clinical accuracy to appropriate staff; however, final responsibility for approval of the materials rests with the committee.
Committee Functions

- Review and Approval of Education and Program Promotion Materials
  - The I. & E. Committee must use an MDHHS approved evaluation form to document their review and individual determinations regarding approval for each educational material.
  - An approved evaluation form is located on the MDHHS website under “Information for Providers” at www.Michigan.gov/familyplanning
    - Sub-recipients wishing to modify or use a different evaluation form must submit it to their MDHHS program consultant for approval.
  - The materials review process must consider the following:
    - Educational and cultural backgrounds of the individuals the materials are intended to serve
    - The standards of the population or community the material are intended to serve
Committee Functions

- Review and Approval of Education and Program Promotion Materials
  - The material review process must include the following
    - Review of the content to assure that the information is factually accurate
    - Determination whether the materials are suitable for the population or community they are intended to serve.
    - The approval process must require that at least one half of the voting members participated in the approval process
    - A written record of the determinations and approval process must be established and maintained (Section 1006(d), PHS Act; 42 CFR59.6(b)) including
      - Minutes must be kept for all meetings and must reflect determinations for each item reviewed
      - Completed evaluation forms or a compiled summary of individuals determinations must be maintained
      - A master listing of committee approved materials with dates of approval
Can these functions be added to an existing body or committee?

- Yes!
- Amend by-laws/policy to include the specific Title X functions
- Document community participation, promotion and evaluation activities
- Define and document education and promotion material approval process, along with maintaining a master list of approved materials
- Maintain meeting minutes
- Maintain a master list of approved materials
- Maintain a diverse 5-9 person membership
  - Could be a sub-committee of an existing group
HOW WILL MDHHS EVALUATE COMPLIANCE?

- Review:
  - By-Laws and written policies that define the committee, functions, membership and meeting schedule.
  - Meeting(s) minutes that document:
    - Community participation
    - Program evaluation
    - Community input
  - Review and approval process for education and promotion materials
    - Documentation of process
    - Documentation of materials reviewed.
    - Master list of approved materials
Summary

- All Title X sub-recipients must adhere to the maintenance of either:
  - Advisory Council and I. & E. Committee or
  - I. & E. Committee that serves the community participation and education function as well as the functions of the I. & E. Committee
  - Agencies may use an existing body to meet this function
  - Functions **must** be defined within by-laws or policy
  - Membership requirements are met
  - Community participation functions are conducted and documented.
  - Review and approval of education and promotion materials conducted and documented
Summary

- Mandated functions
  - Establish By-laws or Policy to govern the committee
  - Recruit and maintain diverse membership of 5-9 individuals
  - Provide opportunities for participation in program development
  - Provide opportunities for participation in program implementation
  - Provide opportunities for participation in the evaluation of the project
  - Review and approve education materials used in association with program services
    - Document the approval process
  - Maintain a master list of approved materials
Questions???