

1.14 SATELLITES

Policy: A satellite is a clinic which provides Title X family planning services at a location separate from the Title X sub-recipient. There are two types of satellite clinics: 1) satellites using sub-recipient staff to provide services; and 2) satellites using other clinic staff to provide services.

Satellites must operate in accordance with Title X Program Requirements, QFP, the Montana Title X Family Planning Administrative Manual, and the Montana Title X Family Planning Clinical Protocol Manual. Sub-recipients considering initiation of services at a new satellite location are encouraged to review the WMHS Satellite Program Review Tools (available from WMHS). The tools outline all requirements and will assist in determining how satellites will function.

Procedure:

Program Reviews

1. The sub-recipient must conduct annual satellite program reviews for satellites using other clinic staff to provide services, in order to assure that satellites operate within the Title X Program Requirements, QFP and in accordance with the Montana Title X Family Planning (MT TX FP) Administrative Manual and the Montanan Title X Family Planning Clinical Protocol Manual. The WMHS Satellite Program Review Tools (available from WMHS) should be used.
2. Sub-recipients should follow the program review process detailed in the MT TX FP Administrative Manual, Policy 1.12 *Program Reviews*.
3. The WMHS will review the sub-recipient's documentation of the annual satellite program review during regularly scheduled sub-recipient program reviews. Documentation of findings can be recorded either directly on the Satellite Program Review Tool or in a separate Satellite Program Review Report. All findings that arise from the satellite program review must be corrected. WMHS is available for assistance.

Satellite Structure and Management

1. Activities must be incorporated into the sub-recipient's activities for the program (Work Plan, Client Satisfaction Surveys, community education/outreach, project promotion, internal medical audits).
2. Expenses and revenue must be included in the Financial Accountability Statement (FAS) submitted to WMHS by the sub-recipient.
3. Clients must be charged according to the sub-recipient's approved Schedule of Discounts and using the sub-recipient's charges for services.
4. All satellites must have a unique clinic Ahlers ID. Sub-recipients should contact WMHS for assistance in establishing clinic IDs.
5. CVR data must be transmitted into Ahlers by the 10th of each month.
6. A broad range of methods must be offered. The satellite's formulary should be the same as the sub-recipient's.
7. Federal and State laws regarding pharmaceuticals must be followed.
8. The satellite must use the same laboratories that the sub-recipient uses.
9. A CLIA license appropriate to the level of in-house lab testing must be in place, even if the only tests conducted are CLIA waived.
10. Medical records must be available for review by WMHS. Medical records must be included in clinical provider competency assessment to ensure accuracy and compliance with Title X policy for transporting medical records to the satellite must be developed if applicable (see MT TX FP Administrative Manual, 8.18.5 *Record Security*).