

# Title X I&E Guidelines & Committee Update

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# Regulations on I&E “Vague”

**vague:** \ 'vāg\ *adjective*

1. *Not clearly expressed; stated in indefinite terms*
2. *Not clearly defined, grasped, or understood*

# Four Layers of Rules

- ◆ **law** (Public Law 91-572)
- ◆ **regulations** (Code of Federal Regulations, Title 42, Volume 1, Part 59.6 “What procedures apply to assure the suitability of informational and educational material?”)

# Four Layers of Rules (cont.)

- ◆ **guidelines** (“6.8 Review and Approval of Informational and Educational Materials,” *Program Guidelines for Project Grants for Family Planning Services*, January 2001)
- ◆ **opinions, interpretations, policies, protocols, etc.** (change over time and from one clinic to the next)

# What do the Regulations Say?

- ◆ The project shall provide for the review and approval of I&E materials by an Advisory Committee, to assure that they are suitable for the population or community to which they are to be made available
- ◆ Shall not disseminate any materials which are not approved by the Advisory Committee

# What about this Committee?

- ◆ Shall be 5-9 members (can be waived for “good cause shown”)
- ◆ Shall include individuals broadly representative of population or community for which materials are intended (e.g., race, color, national origin, handicapped condition, sex, and age)

# Committee should consider:

- ◆ The educational and cultural backgrounds of individuals to whom the materials are addressed
- ◆ Consider the standards of the community with respect to such materials
- ◆ Review the content to assure info is factually correct

# Committee shall: (cont.)

- ◆ Determine whether the material is suitable for the population or community to which it is to be made available
- ◆ Establish a written record of its determinations

# What do the Guidelines Say?

- ◆ Oversight responsibility for the I&E Committee(s) rests with the grantee
- ◆ The grantee may delegate the I&E operations for the review & approval of materials to delegate/contract agencies
- ◆ The committee(s) may delegate review to appropriate project staff, however final approval rests with the Committee

# What is NOT said?

- ◆ How often committee needs to meet
- ◆ Formal/informal nature of committee and meetings
- ◆ Specifically how to conduct review
- ◆ Specifically how to keep written record of determinations

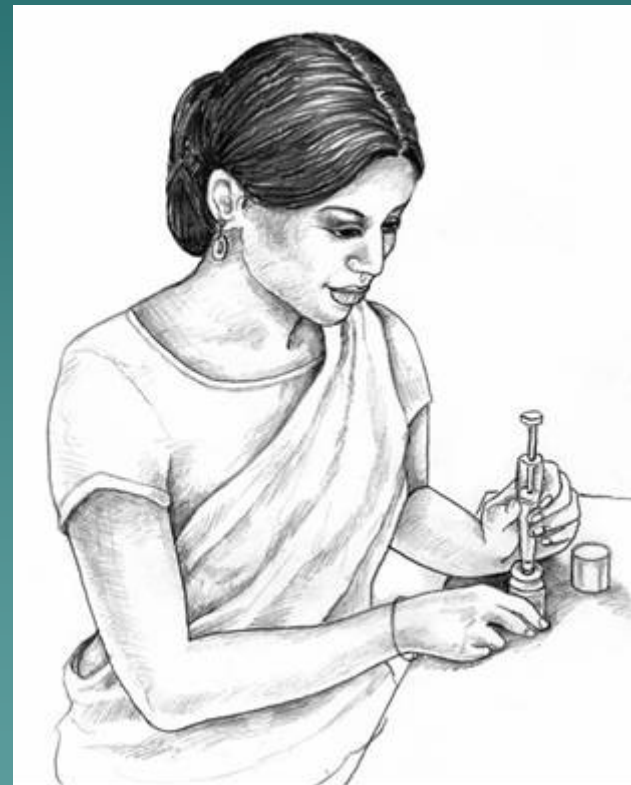
# Why Does All this Matter?

- ◆ Ethical
- ◆ Practical
- ◆ Legal

# “Educational Background”

- ◆ 20% read below 5<sup>th</sup> grade level
- ◆ 30% read 5<sup>th</sup>-8<sup>th</sup> grade level
- ◆ providers speak at “college” level
- ◆ most health ed materials written at 10<sup>th</sup> grade level or higher
- ◆ most informed consent documents written at 12<sup>th</sup>-17<sup>th</sup> grade level (!)

# “Cultural Background”



# “Community Standards”

YOU DON'T FOOL ME, GUYS. SORES FOLLOWED BY A RASH CAN MEAN ONLY ONE THING...  
... **SYPHILIS.**

WHO IS THIS GUY?! A DETECTIVE?

YEAH... A REGULAR DICK TRACY.

**GET TESTED FOR SYPHILIS**  
[www.healthypenis.org](http://www.healthypenis.org) 415.487.5580

HEALTHY PENIS

Public Health San Francisco Department of Public Health in 2010. Photo: Rick & Corbin, Seattle. Graphic: Seattle Visual Solutions ([www.seattlevisual.com](http://www.seattlevisual.com))



Syphilis is spread by "skin-to-skin" contact, through anal, vaginal AND oral sex. Many people don't notice the symptoms or know they have syphilis. The initial sore is painless. The good news is syphilis is easily cured.

**GET TESTED FOR SYPHILIS**  
[www.healthypenis2006.org](http://www.healthypenis2006.org) 408.792.3720



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# Bottom Line

- ◆ Can't be broadly representative of the entire state of California (36.5 million) with 5-9 people
- ◆ Can't review thousands of materials each year
- ◆ CAN be broadly representative of community of Title X Delegate Agencies
- ◆ CAN give you tools and lots of assistance to help you meet regulations



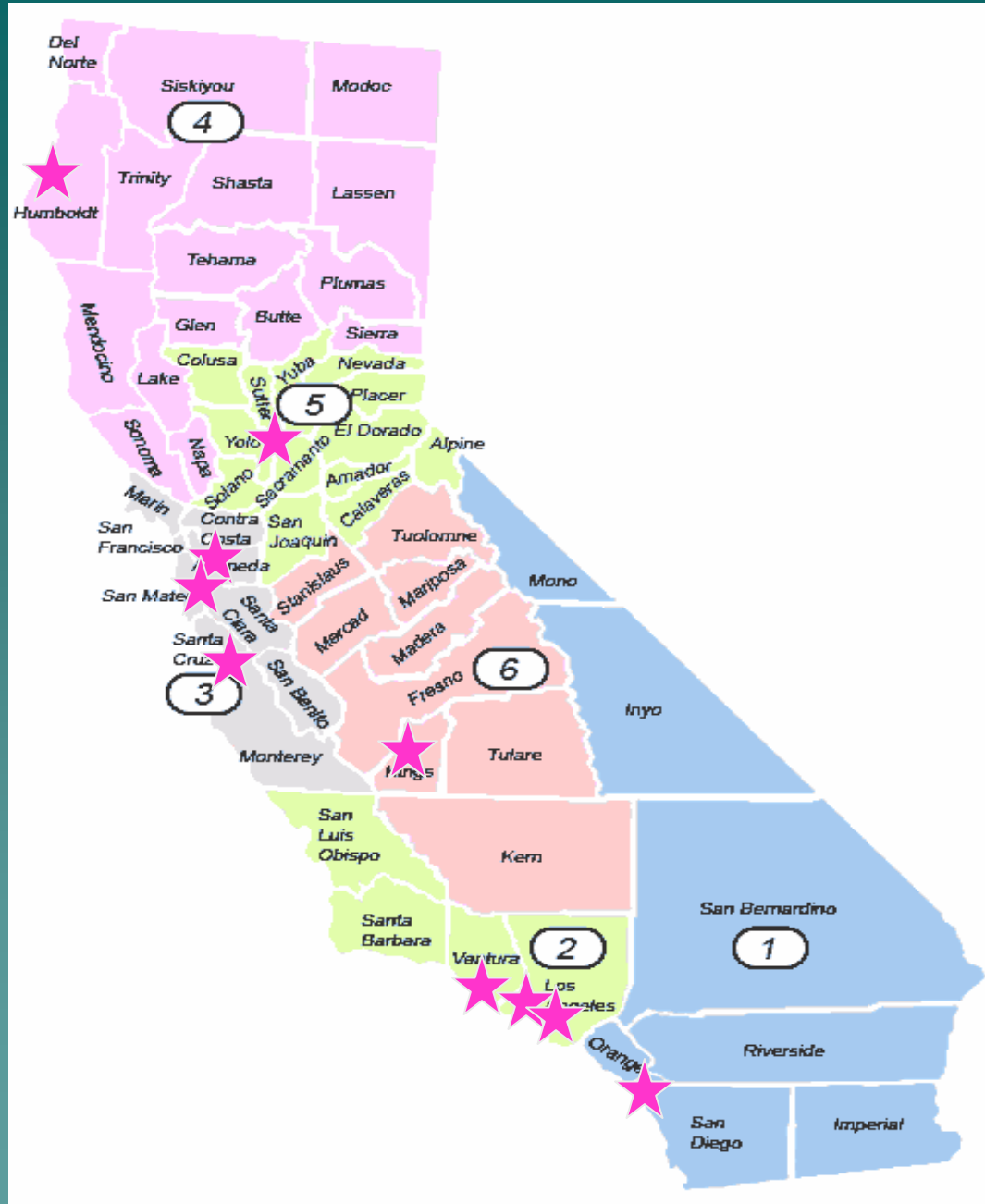
# Formation of CFHC I&E Advisory Committee

- ◆ Recruitment through direct mail flyers and Area Managers
- ◆ Nominations
- ◆ Selection of 11 members from around CA (1 since resigned, 1 on maternity leave)
- ◆ 1<sup>st</sup> in-person meeting in October 2007
- ◆ 2<sup>nd</sup> meeting, teleconference in January 2008
- ◆ 3<sup>rd</sup> in-person meeting in April 2008





- ◆ 38 delegate agencies in Southern CA (Regions 1 & 2)
- ◆ 19 in central CA (Regions 3 & 6)
- ◆ 13 in “true” northern CA (Regions 4 & 5)



# Inaugural Meeting – Oct 2007

- ◆ Training on health literacy and evaluating materials
- ◆ Review of regulations and guidelines
- ◆ Introduction to CFHC online database
- ◆ Discussed role of current I&E practices, role of committee, and *Provider's I&E Toolkit*



# Second Meeting – Jan 2008

- ◆ Development of I&E needs assessment online survey
- ◆ Development of table of contents and specific suggestions for *Provider's I&E Toolkit*

# Third Meeting – April 2008

- ◆ Discussion of results of I&E needs assessment online survey
- ◆ Further training in Health Literacy and evaluation of materials
- ◆ Further development of contents of *Provider's I&E Toolkit* (now being developed)
- ◆ Pre-approval of first batch of materials and fine-tuning of approval form

# Needs Assessment Survey

- ◆ March 2008, sent to 133 individuals
- ◆ 48 people opened survey
- ◆ 22 completed full survey
- ◆ Results on languages needed, challenges in meeting Title X I&E regulations, recommended materials, etc. – see handouts

# On the Horizon...

- ◆ “Pre-approved,” recommended materials through CFHC’s online database

[www.healthed.org](http://www.healthed.org)

Under “Resource Center”  
click “Free Online Database”



# Provider's I&E Toolkit

- ◆ Background info on health literacy
- ◆ Review of regulations & guidelines
- ◆ How to evaluate reading level (Fry graph, etc.)
- ◆ Simple sample checklist for evaluating graphics, white space, etc.
- ◆ Tips on forming and maintaining committees
- ◆ Resources

