

# Confidential Billing:

## Steps for Front Desk Staff

This job aid presents the steps front desk staff should take to identify and implement for confidential billing. When a client requests that a Title X agency not bill their insurance for services being provided, staff should initiate a conversation about confidential billing. When an agency bills for Title X services using the client's insurance, others may learn of the client's visit through the Explanation of Benefits (EOBs), or monetary progress toward the deductible and out-of-pocket maximum in the insurance website/portal. Front desk staff should fully explain these nuances to clients, so they can make an informed decision on choosing confidential billing.

Confidential billing needs may arise during the scheduling and/or check-in process. Front desk staff should assess clients for confidential billing needs based on their preference to stop billing statements from being mailed to their homes and/or to prevent an EOB from being sent to the insurance policyholder. For example, clients may ask, "Will mail be sent to my house?"

### **Clients who may request confidential billing services include:**

- A client who is not the primary insurance policyholder
- A client experiencing intimate partner violence, domestic violence, and/or other threat or concern
- And other case-by-case circumstances

### **The best practice for front desk staff is to initiate a conversation about confidential billing with every client.**

Clients of all ages may need confidential billing, so it is important that every Title X agency become familiar with the state-specific regulations regarding suppression of client communications. Some state Medicaid programs automatically suppress EOBs for sensitive services. Private insurance policies vary in their protections. Even if protections are in place to suppress EOBs, policyholders may be able to see progress toward the deductible and/or out-of-pocket costs in the patient portal. This could have negative repercussions on clients who are not the policyholders.

### **Title X requires that adolescents requesting confidential billing be assessed on their individual income. For adults, the best practice is to assess their individual income.**

# Elements to Support Confidential Billing

**Is the client requesting confidential billing OR has the front desk staff determined the client may need confidential billing?**

**Sample script:** *“If we bill your private insurance, they will mail a statement to the policyholder outlining the services you received. Will this create any problems for you?”*

**No, the client does not need/want confidential billing.**

**STEP 1:** Assess the client's family size and income, per your agency's policy.

**STEP 2:** Collect copay or amount based on your agency's sliding fee scale (whichever is the lesser amount) and bill insurance for services provided, as usual.

**Remember:** Ensure clients do not pay more in copays, deductibles, and other fees than what they would pay based on the sliding fee scale.

**Yes, the client wants confidential billing.**

**STEP 1:** Assess the client's family size and income to determine where they fall on the agency's sliding fee discount schedule.

**STEP 2:** Determine what insurance the client has (Medicaid or private insurance) and if the payer can suppress EOBs and other sensitive information.

**STEP 2a:** If the client has Medicaid, review state Medicaid policies regarding client communications and sensitive information to determine if Medicaid suppresses EOBs and other sensitive information.

**STEP 2b:** If the client has private insurance, your agency should know what, if any, client communications, including EOBs, can be suppressed. This includes asking if the payer can send client communications to an address different from the one of the policyholder.

**STEP 3:** If the payer can suppress EOBs, remind the client that while communications such as EOBs may/can be suppressed, the policyholder may see monetary progress toward the deductible and out-of-pocket maximum in the payer's website/portal. Confirm that this is okay with the client.

**STEP 4:** Once receiving the client's consent, collect copay or amount based on your agency's sliding fee scale (whichever is the lesser amount) and bill insurance.

**If at any time in the process, a client changes their mind or expresses concerns about billing insurance, do not bill insurance. Always follow your agency's policies and procedures for clients without insurance.**

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