

Verifying Client Income: What are “Reasonable Efforts”?



This job aid outlines Title X income verification expectations, the importance of income verification as one element of project sustainability, and includes sample scripts. By not taking the time, staff may be making assumptions that result in the client being under- or overcharged for the visit.

In all scenarios, staff should make “reasonable efforts” to verify what a client’s income is and to collect the appropriate fee(s). Routine income assessment ensures that essential and routine checking of insurance coverage and billing of third-party payers (Medicaid and private insurance) for a billable visit is carried out.

Audience: Title X grantee and subrecipient staff including clinic managers, schedulers, and front desk personnel

Related: A job aid, [Sample Scripts for Verifying Client Income](#), is intended to support implementation of the income verification process.

Four Title X Program Expectations relate to income verification:

- **Financial Accountability 1:** Provide that no charge will be made for services provided to any clients from a low-income family, except to the extent that payment will be made by a third party (including a government agency) authorized to or is under legal obligation to pay this charge. Low-income family means a family whose total annual income does not exceed 100 percent of the most recent Poverty Guidelines issued pursuant to 42 U.S.C. 9902(2). The definition also includes members of families whose annual family income exceeds this amount, but who, as determined by the project director, are unable, for good reasons, to pay for family planning services. (See Section 1006(c)(1), PHS Act; 42 CFR § 59.5(a)(7) and 42 CFR § 59.2.)
- **Financial Accountability 3:** Ensure that family income is assessed before determining whether copayments or additional fees are charged. (42 CFR § 59.5(a))
- **Financial Accountability 4:** Ensure that, with regard to insured clients, clients whose family income is at or below 250 percent of the federal poverty level (FPL) should not pay more (in copayments or additional fees) than what they would otherwise pay when the schedule of discounts is applied. (42 CFR § 59.5(a)(8))
- **Financial Accountability 5:** Take reasonable measures to verify client income, without burdening clients from low-income families. Recipients that have lawful access to other valid means of income verification because of a client’s participation in another program may use those data rather than re-verify income or rely solely on the client’s self-report. If a client’s income cannot be verified after reasonable attempt to do so, charges are to be based on the client’s self-reported income. (42 CFR § 59.5(a)(9))

**Financial accountability #2 does not relate to income verification.*

Title X grantees should have policies and procedures that outline the income verification expectations for their project. Subrecipient monitoring and all direct service agencies should have policies and procedures outlining how they put grantee policies into operation. Make sure the policies and procedures address:

- How often to bring in documentation (e.g., some agencies do this once every six months while others ask for updates as part of their check-in process)
- What is acceptable proof of income (refer to the [Defining Family Income for Title X Charges, Billing, and Collections Job Aid](#))
- When a client doesn’t bring in the required documentation (e.g., let the client know that they can self-declare and provide documentation at a later date; and how clinics will place these clients on the sliding fee scale and bill them accordingly)
- When a client does not/refuses to self-declare (e.g., document that the client acknowledges they will be charged a full fee(s) for the service(s) provided in today’s visit because staff are unable to determine an appropriate discount without that information; and how clinics will place these clients on the sliding fee scale and bill them accordingly)
- When to offer good cause exemptions: 1) a client does not have documentation, 2) does not self-declare, and 3) states they are unable to pay for the services (e.g., allow the project director to waive the fee(s) for good cause); see [Financial Accountability 1 in the Title X Program Expectations](#)

Center the client in all interactions, maintaining every individual’s dignity. The aim is not to be a barrier to services; don’t refuse to provide Title X services because the client will (or cannot) disclose their income.

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STEP	WHEN SCHEDULING AN APPOINTMENT	AT CHECK-IN
Explain the need for income information	<p>"We ask all our clients to provide income information at check-in to figure out the appropriate fee based on your income. We want to ensure we provide you with the appropriate discount for the services you receive today.</p> <p>Do you have any questions?"</p>	<p>"We are excited to care for you and your health needs today. Before we get you in a room to talk to the provider, we need to collect your income information. We ask all our clients to provide this information at check-in to figure out the appropriate fee based on your income. We want to ensure we provide you with the appropriate discount for the services you receive today.</p> <p>Do you have any questions?"</p>
Present options for documentation	<p>"We ask all our clients to bring proof of income to their appointment. We accept a recent pay stub, a benefits letter, or any similar document; this can be a physical copy or an image on your phone."</p>	<p>"When you scheduled your appointment, we shared that we accept a recent pay stub, a benefits letter, or a similar document. Do you have a physical copy or an image on your phone today?"</p> <p><i>If a client doesn't have proof of income:</i> "If you don't have proof of income, that's okay. You can tell me your family size and income. At your next visit, please bring your documents."</p> <p><i>If a client refuses to self-declare:</i> "You will still be seen by your provider and receive the care you need, but since you can't share your family size or income, we will not be able to apply any discounts and will have to charge you full fee for today's visit."</p>
Address client concerns with sensitivity	<p>"We understand that this is personal. We ask these questions of all our clients. Our goal is to make sure we are providing affordable services. At check-in, our staff approach your visit with deep care, respect, and privacy." <i>[Add what your agency does to ensure privacy for clients, such as playing music, having white noise machines, or conducting client intake in a private space.]</i></p>	<p>"We understand that this is personal. We ask these questions of all our clients. Our goal is to make sure we are providing affordable services.</p> <p>Is there something I can do to make you more comfortable providing us with this information?"</p>
Offer help	<p>"If you have any questions or concerns about this process, please let me know. I'm here to help and make this as easy as possible for you."</p>	<p>"Let me know if you have any questions. I'm here to help and make this as easy as possible for you. We know your time is valuable, and we want to get you seen as soon as we can."</p>
Assure confidentiality	<p>"Please know that any information you provide is confidential and will only be used to determine your fee for today's visit."</p>	<p>"The information you provide today is confidential and will only be used to determine your fee for today's visit.</p> <p>Do you have any questions or concerns?"</p>
End on a positive note	<p>"Thank you for helping us with this process. Let me know if there's anything else you need today."</p>	<p>"Thank you for helping us with this process. Let me know if there's anything else you need today. You'll be called to see the provider soon."</p>

Note: For individuals who are uninsured or self-pay, refer to the [45 CFR § 149.610\(b\)](#), which outlines the requirements for providing a good faith estimate to uninsured or self-pay individuals.