



Income Verification Fiscal Workshop

Caitlin: Hello everyone. This is Caitlin Hungate with the Reproductive Health National Training Center, or RHNTC. I'm delighted to welcome you today to our first virtual workshop focused on front desk staff income verification. I have a few announcements before we get started.

Everyone as you're joining the Zoom is muted, given the number of participants. We'll first start with the presentation and then have plenty of time for your questions. We'll have case studies, challenging cases, and you can use the question, you can type in your questions at any time during our time together. Feel free to use the chat panel and feel free to type in your reflections or questions or at any kind the chat is available to you. We did receive a lot of great questions and a lot of phenomenal great examples of challenging cases, in the registration. So we want to get to those in our conversation today, and we will try, though I can't guarantee we'll get to every question in our time together. We'll also be asking for your participation in a couple slides of participating in brief true false polls. So, we look forward to your participation. A recording of today's workshop, along with the slides and transcripts, will be available and email to the participants after our workshop today. So within a couple days that should be available to you all. Closed captioning is available, is enabled for this meeting. So to view click on the closed caption or CC icon at the bottom of your screen. Momentarily my colleague Nancy is going to chat out the evaluation for today's workshop. We really greatly appreciate your perspective and be back. We use your feedback to make quality improvement changes for next events and workshops and we really do take your feedback and comments to heart. Please do take a moment to consider opening the link now and completing in real time. In order to retain a certificate of completion for attending this workshop, if you are looking for that, you do need to be logged into RHNTC.org when you complete the evaluation. Last but not least, this presentation was supported by the Office of Population Affairs. Its contents are solely the responsibility of the authors and do not necessarily represent the official views of OPA or HHS.

I'd like to briefly introduce our speaker today, Dania Garcia. As I said, my name is Caitlin Hungate. I am the fiscal lead on the Title X team on the Reproductive Health National Training Center, and Dania has served in consulting, clinical, program, and project management within nonprofit organizations that primarily focus on reproductive health and education. With over 20 years of experience in health care, her focus has been on program compliance, improving operational performance, staff training, and community education. Dania values the importance of ensuring that individuals have access to quality sexual reproductive health care without barriers. Dania applies her efforts using a collaborative approach with organizations and staff to implement staff training, best practices, process compliance, and improvement initiatives. As an Arizona native, Dania enjoys spending time with her family, traveling, eating delicious food, and organizing donations drives.

So in our 90 minutes today together, the objectives that we hope to accomplish are on the slide. So we hope that by the end of the workshop, you'll be able to describe Title X income

verification expectations, identify one strategy to support positive customer service with Title X clients, to name one strategy described by a peer to improve your front desk staff practices, and lastly, to identify one RHNTC resource to support income verification. Before I turn it over to Dania, let me briefly walk you through our time together. So, Dania first will present content related to income verification, Title X expectations, and more. Then we'll have time for a Q&A. After the Q&A, we'll have the opportunity to practice developing a script for front desk staff that they can use with clients to get income information, followed by another case study. And lastly, we will spend time discussing the challenging pieces or some of the challenging cases that you all submitted during the registration process. Please note that we are looking for your participation throughout the workshop this afternoon. Participate as you're able. If you are able to be on camera, great. If you're not or you need a break from being on camera also great. Through the chat or jumping in on the audio or just listening. Thank you for joining us. And with that, I'm gonna turn it over to Dania. And Dania, you should have control at this point.

Dania: Wonderful, thank you so much, Caitlin, for that kind introduction and good morning to you all or wherever you may be. I'm super excited to be joining you all today so that we can take the time today to learn a little bit more about expectations and best practices and how that all relates to when we're talking about Title X front desk income verification.

So just so that, as we start, I think the very important thing that we should start with is. Some of the specific Title X requirements related to income verification. So let's go ahead and jump into those first.

So, for some of you, this may be a refresher. You may already be familiar with some of these Title X program expectations. And for some of you, it may be something new. So this may be new information. But regardless, I think it's important that we go over these to focus and make sure that we are understanding what the core tenets of those Title X program expectations are. As most of you may know, family planning services are to be provided solely on a voluntary basis. So we cannot coerce our clients or force our clients into accepting family planning and services. Also, we all know that Title X is a very special and unique program. And so some of these expectations are very specific to Title X. So that being said, family-planning clients will not be denied services due to the inability to pay. And also minors, so anybody under the age of 18 is encouraged but not required to involve a parent, guardian, or supportive adult in their respective health decisions. And then finally, this last bullet, although the Title X program expectations, it's not explicitly stated like this, but it is a core tenet of Title X, and that is that all family planning clients, regardless whether they are insured or uninsured, will be treated equally, and will receive the same level of quality services.

Now that we know what those Title X expectations are, how should these expectations be reflected in your policy and procedures? So let's talk next about what those guidelines look like. So your agency's policies and procedures should provide clear guidance to staff on how to apply your schedule of discounts. Your policies should clearly state that a client's inability to pay is never a barrier to service. And also your policy should include, you know, and address how schedule of discounts apply to clients with seasonal or inconsistent income. Also clients who are unable or unwilling to provide household income information and also insured clients, including those who are requesting confidential services and or choose not to use their insurance. I also want to talk about the importance to make you sure that, as you are developing your policies

and your procedure. So this is the, not only the what, but the how that is reflected in your actual practice in your day-to-day operations.

So let's move on to income eligibility guidelines. So again, we kind of touched on this already, but unemancipated minors who receive confidential services must be assessed based on their income alone. And also where there's legal obligation or authorization for third party reimbursement, including private or public sources. Agencies should be making all reasonable efforts to make sure that they obtain third-party payments, reimbursements, without the application of any discounts.

So it's really important that we inform our clients about the process, especially upfront when either at when they're scheduling their appointments or they're checking in, because oftentimes we encounter clients who may have a lot of concerns, especially when it comes to any sort of financial responsibility that they may have or any fee collections. And so talking to our clients upfront, will really help ease any sort of concerns they may have, especially when it comes to fee collections or any sort payments that they may be responsible for. So if you do not already have a script in place for your staff, I would encourage you to use this as a guide that you can implement at your agency. Um, so I will read this as something that, you know, again, this is an example that we can use with our clients and our staff can use to communicate to our clients when it comes to, you know, income verification and also the availability of Title X services. So first we want to start by letting our clients know that some services are offered at a discounted rate through Title X, a federally funded program. and that these services may be at low or no cost if eligibility requirements of the program are met and eligibility is determined at the time of visit. So that's just, again, this is just a sample script that you may use as a guide if you don't have anything already in place at your organization.

On that same vein, we also want to make sure that we are getting authorization from our clients to bill their insurance and letting them know that we have the ability to bill their insurance if they want to use their insurance for their family planning visit. And so again, this is just a sample script that we can use with our clients as a guide. So I will go ahead and read this to you all. So if you have health insurance, we can bill them directly. So once we receive payment from the insurance company and know any amounts you're responsible for, we discount your portion based on your income. So you will never pay more by using your insurance than you would without it. Do you have insurance that you would like to use for this visit today? So again, it's very, very important that we are getting, that we're explaining to our clients, again, our process. when it comes to collective income verification, how we're using that information, and of course, getting their authorization to bill their insurance. So now that we've communicated this information to our clients, I think we want to, I like to move on and talk about what information should we be collecting and, you know, what does reasonable efforts look like and what does that mean?

Income verification guidelines. Again, Title X agencies are required to take reasonable measures to verify client income without burning our clients. So, and this information is needed to assign the appropriate discount for services. So agencies should be accurately assessing the client's income and family size. It's very important that, you know, that process is specified in your agency's policies and procedures. So, what does that look like as far as, you now, how is this operationalized? And then finally, you, know, very important that along with staff training across the board, you know, across all your agencies and service sites, that you have a uniform

implemented process. Again, just for consistency. amongst the services that you're providing to make sure that your staff are being consistent, that your clients are receiving the same message, whether they're going to clinic A or clinic B, it's consistent throughout your organization. Agencies that have lawful access to other means of income verification because what your client may be participating in another program, you may use that data, that information to either re-verify their income or use that information to assess income eligibility, or, you know, rather than, you know, asking the client to bring in, you know, this information again, or just solely relying on a client's self-reporting. So, a client self- reporting income is allowed as a last resort once you have taken, you now, other reasonable measures and efforts to collect that information, and the inability to self- report or self- Report income, excuse me, the inability to verify or self-report income should never jeopardize a client's visit or access to family planning services.

Let's talk about income verification guidelines and how those should be reflected in your policy. So again, your policies should outline, you know, the frequency that your clients should be bringing in their documentation, and this is gonna vary by agency. So, you now, some agencies do this once every six months while others do ask for updates as part of their check-in process. So again. This is going to depend on your organization. It's really up to your organization how you determine the frequency of that. And the same goes with what's acceptable proof of income, like what kind of documents. So the RHNTC has a excellent resource. Then you'll see the link here. So you can use this as a resource, as a guide. As far as examples that you may use as ways to, you know, acceptable ways to document that client may use to show proof of their income. So, I'll, you feel free to take a look at that resource. Also, your policy should address situations when a client doesn't bring in the required documentation. So, what is your agency's policy and process with that? So. Does that mean that you let the client know that they can self-declare and they can provide documentation at a later date? So again, that is really gonna be up to your organization.

Okay, and again, just more information on guidelines for income for vacation, you know, and how it should be reflected in your policies. Again, your policies should address situations when a client does not or refuses to self declare. So again, this is going to be depending on your agency and that's something that you know you will, you know, decide internally. but it may look like letting the client know that they'll be charged a full fee for their services that day, because you were not able to determine an appropriate discount without that information. And then also when to offer good cause exemptions. I do want to note that in order for you to provide a good cause, when you went to offer a good cause exemptions, It's really important that. These three kind of requirements are included in order to provide a good cause exemption. And that is a client does not have documentation and does not self-declare and a client states that they're unable to pay for their services. So again, this is where. you know, the project director or, you know can waive fees for a good cause. So, and again, we have a wonderful resource the financial accountability and the under Title X program expectations that you can use as a reference and as a resource. So again, all those three, those three things have to take place in order to offer a good cause exemption for your clients. Okay. All right. So we've talked about policies and how those expectations should be reflected in your policies.

Let's talk a little bit more about income eligibility guidelines. So this is more information

regarding income eligibility. So as most of you may know, Financial eligibility is based upon the client's income and family size. And we use federal poverty level guidelines to determine where a client falls on either the site and fee scale and or, you know, what discounts need to be applied. So, those FPLs, those federal poverty, level guidelines is what we use, along with, you, know, the client's income and family size to determine that. So. Anyone at or below 100% of the FPL there, their services are at no cost to them. Clients who fall between 101 and 250% of the FPL, their services are based on a discounted rate. And again, that is determined on your sliding fee schedule and your schedule of discounts. As far as defining family income and what that definition means, a family is defined as a social unit composed of one person or two more persons living together as a household. And all of, you know, this is why income verification is so important and essential to this because without that information, we cannot appropriately assess a client, you know as far as what kind of discounts should be applied and what financial responsibility if anything, if any, they will have.

Once we collect that information, and how are we collecting that information and where you are documenting that information is also very, very important. So this is the information where we should be collecting this information. So in our client eligibility forms, however, that can be your intake forms, your demographic forms, however you refer to it at your organization. But the best practices as far as, what those forms should include when we're collecting this information is very important. Income and family size, client signature and date. This is not just for in-person visits, but telehealth visits. This like acknowledging, the client is acknowledging that they have voluntarily provided this information. And if the client declines to provide family size and income, then it's important that we are documenting that the client refused to provide this information. So, very important.

How do we address questions about costs from our clients? So it's very important that clients understand that without their documented income and family size, we, our agencies may not be able to, they may miscalculate what a client may be responsible for financially, right? So this may be, you know, a lower fee, no fees. in order for us to determine and give our clients the appropriate discounts, assess them accordingly based on our sliding fee scale or schedule discounts, we need that information. And it's really important that, this is a reminder that we can, again, we cannot deny our clients family planning services due to the inability to pay, but also clients cannot be denied Not just again, not just services, but any variation in the quality of services because of the inability to pay. Another thing that I want to also mention is that we should never be telling our clients that they qualify for a free or donation visit because if we don't have the information to be able to assess them accordingly, that income and family size information, then we cannot assume that their visit is going to be free, for example.

So let's talk about procedures and how that looks like at your agency, at your health centers when we are collecting that information and verifying that information from our clients. Okay. So again, we already touched on this, but I feel like it's a really important reminder that unemancipated minors who wish to receive services on a confidential basis must be considered on. their own resources, so it's their income, their information only. Best practices is that, you know, we want to notify and collect fees at the time of visit, right, to, you now, ease any anxiety or concerns that our clients may have, you if they have any sort of response, any sort of financial responsibility, and at that point, we can establish a payment plan if, you that is your

agency's practice. And also, at least at minimum, we should be verifying income annually with all of our clients. Now, some agencies do a little bit more often, but at minimum best practice is that it's done at least once a year.

So verify income, again, it's important that we are reassuring our clients that the reason that we're asking for this information is so that, because it may be that they're eligible for low or no cost services. And that again, if a client's income cannot be verified after reasonable attempts, then we need to base those charges on self-reported income. So this is what the client is self-declaring as, you know, this is my income, you know, annually, monthly, whatever.

This is another sample script. This is not something that you already have in place within your organization, but this is just something that your staff can use as a guide to communicating with our clients about what that eligibility process looks like. So again, letting our clients know that at your appointment, you will be asked to complete some paperwork. And on the paperwork, you'll be asked how many people are in your family and how much money everyone makes. And using that information, your services may be at either no cost to you, or meaning you don't pay anything, or you may receive services at a discount rate, meaning that you might have to pay a certain amount. So the front desk will let you know how much you qualify for before you're seen. So again, this might be done when the client is scheduling an appointment, it may be done when they're checking in, or when they may be meeting with an eligibility specialist. Again, whatever, you know, your process and your... your staffing and how is that how that's set up at your organization.

So let's talk about fee assessment guidelines. So again, it's very important that we are collecting this information on all of our clients. So income, family size, and whether or not the client has insurance. For self-pay clients, even if the client is self-pay, so meaning that they don't have insurance, they don't want to use their insurance, we still want to assess where they fall on our sliding fee discount schedule and apply any associated discounts to the full fee of their services. Now with clients who have insurance, we still also want to collect that information because we need to assess them on the sliding fee scale to compare their copay and charge the lesser amount between the two. So if we, if it's, you know, if the patient is going to If their co-pay is higher than what they would have paid if they were on the sliding fee scale, then we go with the lesser amount. So that is why we need to collect that information.

Again, continuing with fee assessment guidelines, so per Title X requirements following the 2021 final rule. So clients who have insurance, whose family income is at or below 250% of the FPL should not pay more than what they would otherwise pay when the schedule of discounts is applied. So again, the RHNTC has a wonderful resource that outlines that. and defines what that means and what that looks like and also provides examples, some different scenarios. So again, I encourage you all to reference this as a resource for your agency.

Again, connecting to fee collections, especially with clients who have insurance specifically. So again, we stayed this before, but still we need to assess our clients who have assurance on the sliding fee scale to make sure that any discounts they may be eligible for and compare it to the copay and charge the lesser amount. And then again. Title X 2021 final rule states that, you know, the same thing applies to clients with insurance. So they should not be paying more than what they would pay with the schedule of discounts applied.

Again, just fee collection best practices. I know that you all are aware of this, but it's really, you know, it is a best practice that we are collecting any fees, any co-pays upfront from our clients rather than billing them or, you know, collecting at a later time. So again, just important that we are, you know, again, to support our revenue. And we are collecting those fees up front from our clients. And Caitlin, I don't know if you wanted to add any more or talk a little bit more about this.

Caitlin: Go ahead, Dania, in the interest of time, let's go ahead and.

Dania: We're good. OK. So when we're asking our clients or letting them know, if they have any financial responsibility, we wanna make sure that we're letting them know clearly, accurately and kindly of any financial responsibilities they may have. So again, these are just some sample wording. I know that you all are doing a great job and your staff is as well, but letting them that what their balance is today. So your balance today is X amount, How will you be paying for your services today? And then going to explain to them the forms of payment that your health center or your agency accepts. So whether that's cash card or check. I know I've been talking for quite a while now, so I think now's our time to do your, for us to test your Title X knowledge, and so we're going to do a quick poll, and I believe my friends who are here, they are going to help me launch this, or they're gonna launch it on my behalf.

Caitlin: Exactly. Thanks, Dania. So Nancy is hopefully going to launch a poll that you'll see. So true or false, collecting income and family size information is not required for minor clients. So those that are 17 and younger receiving family planning services and then services are provided for free. So we'll give it a few more seconds. We so far have We see responses coming in. So we'll give it another five seconds for everyone to weigh in. So I'm gonna count you down. Five, four, three, two, one. Nancy, if you wanna go ahead and end the poll. And then, Dania, I'd love to turn it over to you to share your reflection.

Dania: Yeah, thank you. So it looks like, you know, the majority of our responses was false and that is. And that is true. So I will, yes, the answer is false. So yes, regardless if a, even if a client is a minor, we still need to collect their income and family size, even if it's, you know, but if they're seeking confidential services, it's solely based on their information, but we still to collect that information. So, and you know services are, are not necessarily always provided free and we should not be using that language because we don't know whether the services are going to be at no cost to a client unless we have that income and family size information because otherwise there's no way we can determine or assess them on our schedule of discounts or sliding B scale. So, yes, the answer is. false. We should be collecting this information on all our clients. So thank you.

Caitlin: Thanks, Dania. So our next poll, let me get to our next slide. You'll see a new poll launch in just a minute. Our next true-false statement is, a client who declines to provide income and family size may not receive family planning services. Please take a few seconds and answer true or false. And the results are kind of trickling in, So we'll give it another maybe. 10 seconds, so I'll count down from five and then. Okay, so five, four, three, two, one. If you can

please close the poll and then I'll turn it over to Dania to.

Dania: Yeah, thank you. Okay, so again, overwhelmingly the majority of our responses said that this is false and that is correct. So yes, a client who declines to provide income and family size information is still and should be receiving family planning services. So again, going back to what is the core tenant of Title X, what is this spirit of Title X? So ensuring that our clients have access to services. They are aware of the availability of Title X. We don't want to create any barriers to our clients and or deny services because of the inability to pay. So yes, we still are expected and should be providing family planning services to our science.

Caitlin: Thanks, Dania, so much for that. And thank you for everyone for jumping in real quickly with those two polls. And again, we want to, if you still have questions, I would encourage you to review the Title X program expectation handbook. And we've put that in the chat before and we can also put it in the chat again. But that would be your go-to resource to know what is expected or required for Title X. So we are now, I'm going to stop sharing and my colleague Nancy is gonna stop.

Dania: Yeah, so thank you again, all I, you know, I love the questions. I wish we had time. I almost feel like we need to have a webinar just to address all the questions, but maybe. And that's a thought. But anyhow, so again, just some key points and key takeaways when it comes to income verification. Again, remember, and if we've been talking about this throughout today's workshop is, remember the spirit and the expectations of Title X. So taking reasonable efforts to verify income without burdening our clients. Know that you are a trusted, safe resource to our clients and our communities for accessible, high quality, reproductive and family planning services. And the goal is to collect income data on all clients. So again, we should not be training any of our clients any differently. regardless if they're insured, uninsured, if they are paying out of pocket, et cetera. And the goal here is to collect income data, oh sorry, and again, per the Title X program expectations, if a client's income cannot be verified after reasonable attempts, charges should be based on the client's self-reported income. So again, do need to make reasonable attempts to collect that information. Obviously not in a manner that it's going to burden the client, but you still need to try and collect the information. And if that's not possible, then you can take that next step and give the client the opportunity, the option to self-declare their income and household size.

Caitlin: Thanks, Dania. So I'm gonna jump in and wrap us up in the last couple minutes. We might have time for one question more. So I might, if I have time, Dania, I'll put it to a question. So we just wanted to direct you to a few resources that are on RHNTC that we've mentioned, the collecting co-pays. job aid before, that's a really helpful resource, the archived webinar, and just a FAQ document about client fee collections that are available on RHNTC. Please do stay in touch with us if you are not already connected. And before I wrap us up, I think we have time for one more question, Dania. I wrapped us up a little, our wrap-up went a little quickly, so I am going to go back to our questions. Is that gonna, let's. I know that we talked about this a little bit in the scripting and practice scene, but do you have any closing thoughts about, let's say someone is a clinic manager, but not the front desk staff. So what kind of support should clinic managers have in place to help their front desk staff team or staff with actually asking the

hard questions or starting a challenging conversation when asking about someone's income? Do you have closing thoughts about what clinic managers should do and what they should have them.

Dania: I know it seems really like it's not my training. Staff training is so important. It's not just one time, it's continuously doing refreshers, check-ins, so throughout that employee's time with you. Checking in like, hey, are we seeing a change? Are we encountering these new situations or scenarios and talking through that with our staff and providing them support with that ongoing staff training and support.

Caitlin: Thanks, Dania. And I see another question in the chat. What about if pay stubs are under a different name? Do you have any guidance or words of wisdom for the situation if paystubs are in a different name?

Dania: Yeah, um... Oh, okay, well, again, I'm gonna refer, I'm going to defer to my friends at RHNTC. I think, you know, getting some clarifying questions, you know as far as, oh my gosh, all these scenarios start popping into my head, right? But I think getting some clarify questions as far as, you know, is this your income? Is this, you know? Is this your spouse or your partner or whomever? And then, you know, regardless what. If that is the client's income then, or that is their means of how their household is being supported, then I think that's the information that you use.

Caitlin: and I was just.

Dania: Yeah, go ahead, go head.

Caitlin: Yeah, I want to reiterate what you and I both have said. It's important to have these things outlined in your policies and procedures. And it really shouldn't be on a front desk staff in the moment to be figuring out what they should be doing. This should be, these are, if you encounter clients where they have multiple pay stubs and it's different names or. Other different ways that then that is an opportunity to take that back to your team and look at your policies and procedures and make sure that it is not. That it is outlined so that front desk staff is not doing something different than front desk stuff be right, and so my answer is not a this is exactly what you should do, but it should be in your policies, and procedures, and that if it is, not, if these situations come up, then I would use that as an opportunity for that quality improvement, that training that Dania keeps talking about, and revisiting your policies and procedures, and have a uniform policy and procedure that you follow.

Dania: Yeah, and I think this is where, yeah, I think, again, just to add to that is this is where, you know, your procedures, it's not just your policy, but it's your procedures. Right? So again, it is not just the what is this, but how, right? How is this going to be carried out? What does this mean? How is it operationalized at your agency? And this is where, you know, in those kind of like more, you know, unique. complicated, however you want to call it, scenarios where, you know what, maybe this needs to be elevated to where. Practice manager or administrator needs to work with that client one-on-one. So, and that needs to be a different conversation. So, but again, it's so important that those policies and procedures are outlined and in place, written and approved within your organization.

Caitlin: Absolutely. Thanks, Dania, for weighing in. And thank you all for joining us today in our workshop. And I hope you'll join me in thanking Dania and her expertise in the chat. My colleague Nancy chatted out the evaluation link. Thank you, Nancy. And again, please complete this evaluation for our workshop today. We really value your feedback, and we use it to inform future sessions and future events. So please do take a minute to complete it. And again if you are looking for a certification, the certificate of completion, you need to be logged in to rhntc.org when completing the evaluation to get that certificate. As a reminder, we'll have the materials from today's workshop. It will be emailed to you all, and then will be posted on rhntc.org in a few days. If you have additional questions, please let us know and follow us up at rhntc at jsj.com. I'm sorry we did not get to all of your questions. We knew that when we saw the amazing questions and key studies coming in through the registration, but we tried to group them. in buckets that would hit on most of the pain points for you all. Please do stay in touch with us if you're not already signed up for e-news or follow us on LinkedIn. Thank you again for joining us and thanks. This does conclude our session and have a wonderful rest of your day. Thanks so much.

Dania: Bye all, thank you.