



## **Video Transcript:** Repeat Front Desk Income Verification Workshop

**Caitlin Hungate:** Hi everyone, this is Caitlin Hungate with the Reproductive Health National Training Center, or RHNTC. I'm thrilled to welcome you to a repeat workshop focused on income verification. Clearly, there is a lot of interest and need and so we were really happy to be able to repeat this workshop today. Before we begin, I have a few announcements. Everyone as you joined the workshop room was muted, given the number of participants. But you are able to unmute and mute your line at any time, and there will be plenty of conversation with you all, so we hope that you will unmute and join the conversation with Dania and Nancy and Allie and I. We will first start with a presentation and then have plenty of time for your questions, case studies and challenging cases. You can use the chat at any time to ask your questions during the workshop. We did receive a lot of great questions that we have ready to dive into later, and we will try to get through all of them today.

We'll also be asking for your participation throughout the workshop with a poll later in a few slides and then a couple true false questions at the end of the conversation. A recording of today's workshop along with the slides and a transcript will be emailed to participants and be available on RHNTC.org in the next few days. Closed captioning has been enabled for this workshop. To view, just click the CC icon at the bottom of your screen. My colleagues will be chatting out an evaluation link momentarily for today's workshop. We greatly appreciate your feedback and it has enabled us to make improvements and adjustments throughout our years as a training center. And please do take a moment to open it up. If you wanna follow along in the conversation and complete the evaluation, do so. In order to receive a certificate of attendance of completion for attending this workshop, you need to be logged into your rhntc.org accounts when you complete it. Last but not least, this presentation was supported by the Office of Population Affairs or OPA. Its contents are solely the responsibility of the authors and do not necessarily represent the official views of OPA, OWH, or HHS. So as I mentioned, my name is Caitlin Hungate. I am the Title 10 Fiscal Lead on the Title X team of RHNTC.

And Dania, on the next slide, Dania is a consultant and she has served as in consulting clinical program and project management capabilities with non-profit organizations that primarily focus on reproductive health and education services. With over 20 years of experience in healthcare, her focus has been on program compliance, improving operational performance, and staff training and community education. Dania values the importance of ensuring that all individuals have access to quality sexual reproductive health care without barriers. Dania, is there anything else that you want to say about yourself before I move to the next slide?

**Dania Garcia:** No, thank you, Caitlin, that was a lovely introduction and I'm really excited to be with you all today.

**Caitlin Hungate:** Yeah, and we're really honored for Dania's expertise in this conversation around income verification.

So the next slide has our objectives for today that we hope that you'll be able to describe Title X income verification expectations that you'll be able to identify one strategy to support positive customer service interactions to name one strategy described by a peer that you can improve front desk staff practices and identify one RHNTC resource before I turn it over to Dania, I want to walk through again one hour and a which goes by really quickly in our experience what it's going to look like. So we're going to have a brief presentation that Dania will mostly be presenting on. I will have a few points just coming up, but she'll talk about content related to income verification, Title X expectations, and more. Then we're gonna turn off the recording and dive into Q&A and we'll have

opportunity to practice for you to develop a sample script that you could use to get income information followed by another case study and loads of time of discussion. So this is really an active conversation and we really are looking for your participation. Thank you so much for joining us today, and last but not least, please feel free to participate as you're able to. If that means turning your camera on, great, it's nice to see a few folks. If that means turning your cameras off, we also understand using the chat or the audio to participate in the conversation, we just welcome you and invite you to participate as you are able.

Lastly, we realized in the first conversation that we did in the first income workshop, income verification workshop. A lot of you may be looking to Dania and I or those of us on the call today to tell you what is or is not compliant with Title X program expectations. Unfortunately, that is not our ability. That we can't tell you what is or is not or will or will not be compliant from a program expectation standpoint. But what we can talk about is best practices approaches that we've seen that work. And again, if something comes up, if a strategy comes up from a peer that they found that has worked for them or they've been given the approval that it is compliant, we encourage you if you are not a Title X grantee to take that question up to your Title X Grantee, then they can ask OPA, their project officer, is this or not compliant with Title X expectations. I wish we were in a position that we could tell you, but that is not our role and our job, and that is out of our lane. So I just want to at the front beginning of the conversation, say that I know Dania probably will repeat that in the conversation, but we just wanted to reaffirm that what you'll hear are best practices, approaches that work that we've seen. But that we can't actually say if you do this, you will be in compliance. That's a question for your Title X grantee and your OPA project officer. Next slide, please.

We realized in the first workshop, there's a lot of terms that we use in this space that can be confusing, and so we wanted to just level set around some of the terminology, some of which is specific to Title X, and some of it is general healthcare industry-wide. So, on the next slide, you'll see fees or charges. These are terms that are used interchangeably in the medical or health care field and in Title X. They mean the same thing. You'll see in contracts and the Title X program expectations, you will see fees or charges used. And you'll also see in RHNTC resources that we use both fees and charges in our materials. A Fee schedule. This is also known as a full fee schedule, charge schedule, charge master. There may be other terms out there that also mean this. In the Title X world, this is called a schedule of fees. So a fee schedule is industry-wide, it is not specific to Title X. What a fee schedule or schedule of fee is, it lists out the full cost for each of the services that you provide. Typically by CPT code, which includes your costs, you're looking at private insurance, local markets, and or Medicare rates. And we are linking to the Title X Project Cost Gathering workbook as an example for you to understand your Title X costs. Now, if your program is 100% Title X family planning, this is a fairly easy equation that 100% of your costs are connected to your Title X program. Now if you work in an organization, a local health department, a federally qualified health center, and you have other services provided beyond Title X. This is where you have to identify any shared costs, shared indirect costs such as personnel, others, rent, heating, electric, all of these other costs that are shared across programs. And that's what this resource that we linked in the chat will help you gather what your full costs are.

And again, that varies based on your setting and your program type, if you are only Title X family planning or if your organization provides other services as well. The fee schedule is also informed by your clinic costs. I kind of talked about some of the other costs. And again, this may be through a cost analysis or other methodologies per the Title X expectations. And then for more information about setting a full fee schedule, you can link to the setting a Full Fee Scale job aid that we've linked on the on the in the chat and it's on the slides as well. One, I'd like to give an example or a metaphor of what this fee schedule is. A while ago, I saw the National Academy for State Health Policy provide a helpful analogy. They said that the charge master or the fee schedule is essentially the health care market equivalent of a manufacturer's suggested retail price or the MSRP for car buying in car buying, right? You've got the MSRP of a car but what you actually pay there is a difference and that's kind of what when you think about a fee schedule or schedule a fee think about it if it's a helpful for to me, it's the suggested price.

Okay, a few more terms and then I'm gonna turn it over to Dania Okay, so contracted rate. So this is an industry-wide term across payers. That a payer agrees to pay for a given service and your contracted rate can and does vary across payers. So if you have a contract with Cigna versus Blue Cross versus Aetna versus United this the contracted rates may and look and likely will be different. So if your fee schedule says a price says a service is \$125 and this is what is billed to payers Aetna's contracted rate is 120, Blue Cross is 115, etc. The difference between the full fee, 125, and your contracted rate, is what is written off. Your schedule of discounts, again, this is another term, OPA, it's also you also can use the language of sliding fee discount schedule. This term is specific to Title X. Other federal programs such as the FQHC and 330 program. Have different expectations around their schedule of discounts, but it is an agency's listing by federal poverty level ranges. Again, these are sample ranges. It's not necessarily what you have to have in your schedule of discounts and it corresponds with an associated discount to ensure that low income individuals pay based on their ability after assessing family size and income. And the RHNTC has many resources, including some Title X and FQHC examples around schedule of discounts. We've linked to a few examples in the chat, and I'm not going to read out the Title X expectation, but that's where you get the specific language of schedule of discounts and what is specific to Title X. So I am going to turn it over to Danya at this point.

**Dania Garcia:** Great. Thank you so much, Caitlin, and I appreciate you taking the time to do that level setting, especially when it comes to the terminology, because oftentimes we're talking about this topic along with Title X. It's a lot and it can be a little confusing, so I appreciate you taking time to clarify, especially around some of those terms that we use every day. So again, thank you all. I am so excited to be here with you today leading this workshop, And I want to just go ahead and get started and just talk about. Some of the Title X program expectations when it comes to fee collections, billing, and income verification. So some of you may already know this, and this is always just a nice reminder about the specific Title X Program expectations. But as you know, family planning services are to be provided solely on a voluntary basis. Family planning clients will not be denied services due to the inability to pay. This is something very unique to the Title X program. And also minors, so teens are encouraged but not required to involve a family, guardian, or support in their reproductive health decisions. And then finally, again, something very unique but also great about the Title X program is that all family planning clients, whether they're insured or uninsured, will always be treated equally and receive the same level of quality services, right? So all of our clients, regardless of. You know, who is, you know their peer source, we're always to ensure that they really receive those same level of quality services that we offer in our health centers.

So we've talked about what those program expectations are. So let's talk about as you're developing or if you are reviewing or in your policies, what should be reflected in those policies to ensure that it's meeting and covering those Title X expectations. So, it's always very important that your agency's policies provide clear guidance for your staff on how to not just only apply the schedule of discounts, but also, you know, anything related to fee collection, you, know, billing, et cetera. Your policies also should clearly state that a client's inability to pay is never a barrier to service. Again, this is something that's very unique to Title X. And also it's important that, you know, your agency addresses in your policies, you know, cases where a client has seasonal or inconsistent income. Clients who are unable or unwilling to provide household income, and then finally, insured clients. So those who are requesting specifically confidential services and choose not to use their insurance. So these are really important points that we encourage you in its best practices that you are including and defining in your written policies and procedures.

OK, so we've talked about what should be included in your written policies. But let's talk about income eligibility guidelines next. So again, we touched on this a moment ago, but minors who receive confidential services must be assessed based on their income alone. And then also when there's legal obligation or authorization for third-party reimbursement, whether that's public or private, you know, or resources. We must make all reasonable efforts to... Obtain third-party payment without the application of any discounts, right? So this, it's really important that, you know, when we are able to, we're billing our, you know, client's insurance, you know, and collecting on that, you know obviously without any concerns with confidentiality.

Okay, so in addition to having written policies and procedures for your agencies, it's also important and highly encouraged that you develop scripts as a tool for your staff so that they are comfortable and confident in communicating what those program expectations are when it comes to Title X. Also, that they are... That they are able to explain the availability of Title X and then also any other billing and fee collection procedures. So if you don't have a script within your agency for your staff, Here is an example of a sample script that your staff may use to be able to, again, comfortably and clearly communicate to clients about the availability of Title X services. So I'm going to go ahead and read this, but it says some services may be offered at a discounted rate through Title X, a federally funded program. These services may be at lower no cost of eligibility requirements of the program met and eligibility is determined at the time of visit. So again, your organization already may have something like this, but you may absolutely this is a guide that you may use and implement at your agency.

Okay, so we've talked about, we shared an example of a script. Where folks, as a way for our staff to be able to inform folks about the availability of family planning services, but also following up to that, if applicable, we also want to be able to communicate to our clients about billing insurance and letting them know that we can bill insurance and then what does that mean and what does it look like. So again, explain to them what the process is. So again another sample script. If you have health insurance, we can bill them directly. Once we receive payment from the insurance company and know any amounts that you are responsible for, we will discount your portion based on your income. 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? So again, just a sample script. You may already have something existing already within your organization, but it's always encouraged that you take a time if maybe tweaking it or just evaluating or reviewing it and making adjustments if needed.

So the next step is once you have developed your written policies around some of the Title X program expectations when it comes to income verification and fee collection and billing, it's important to support that, that you are also outlining policies or procedures on what that looks like and how is that going to be carried out within your organization. So It's important that within those written policies and procedures that you are explaining how often to bring in documentation is expected of your clients. And again, this is going to vary by agency. So some agencies do this every six months, while others are updating information or asking for updated information as part of their check-in process at every visit. So So again, so it just really depends on your organization. And so again, but it is still important that you are outlining what that looks like, not just for your clients, but for your staff, right, who are going to be, you know, carrying out those procedures within your within your health centers.

Also, defining what an acceptable proof of income is, right, like some examples, right? Is that paycheck stubs? Is that tax forms? Whatever that looks like for your organization. The RHNTC has an excellent resource, and we've shared the link here for you all. It's called the RHNTC Defining Family Income. So it also, you know, provides some examples and language on how to define that. And then finally, you know, it's important that you know you are addressing within your policies and procedures situations where on how to handle or manage when a client doesn't bring in the required documentation right as defined by your organization. So, again, that may mean letting the client know that they can self-declare and then provide documentation at a later date. So again, whatever that means and whatever that looks like for your organization.

OK, so moving on, so more things that you may want to consider as you're developing your written policies and procedures. Also, how to address situations when a client does not or refuses to declare self-income. So again, what does that look like within your organization? Is that letting the client know that they're going to be charged for their full fee, a full fee for their services that day? Because your agency is unable to determine an appropriate discount without the information needed to be able to see where they may fall on the sliding fee scale. So again, it's important that you are addressing those specific and very unique situations that your student may encounter to be about to have a resource on how to manage those effectively and efficiently. And then lastly,

this is very important that you also have a policy and a procedure on when to offer good cause exemptions. So very important, that when you are offering a good cause exemption within the Title X family planning program. All three of these... Points or criteria need to be met. So it's not one or the other. It's all three. So that is one if a client does not have documentation and does not self-declare and a client states that they are unable to pay for services. So again this is where you know you know again You may establish who is responsible for making that decision, so typically a project director or manager can waive those fees for a good cause. And again, this is outlined and defined in another excellent resource provided by the RHNTC, which is under the financial accountability and the Title X program expectations.

So let's talk about income eligibility guidelines. So as most of you know, financial eligibility is based on the client's income and family size, and we use federal poverty level guidelines, also known as the FPL, to determine if the client has any financial responsibility for their services. So if a client is at or below 100% of the FPL. That is no cost to the client. If the client falls between 101 and 250 percent of the FPL, their services are on a discounted basis, right? And so those, that is outlined and defined within your agency with your slightly fee schedule. Now, we often get questions around defining family income and what is considered or the definition of family when we're trying to determine income and household and family size. So. Family is defined as a social unit composed of one person or two or more persons living together as a household, right, as a unit. So oftentimes we will encounter situations where, you know, you may have two siblings and they are all living in the same, under the same house, in the house with their respective families. And so typically you will, you That your clients, you know, their unit, right? Their family as their own income and family size. So people always, we always, that's a question that comes up pretty often. And then also, this is why income verification is essential to this, right? Because without that information, we cannot determine, it's make, you know, income, without the information, we can't determine where a client is going to fall on that sliding fee scale.

Okay, so what best practices on how to not only collect this information but document this information? So on your client eligibility forms or patient registration forms, intake forms, demographic forms, however that is referred to at your agency, it's some best practices on what should be included on that form, should be, you know, obviously the income and family size, right? So a space where a client can provide that information. For, you know, your organization. A client signature and date. This is a best practice not just for in-person visits, but also telehealth visits, right? Because this is, you know, the client acknowledging and stating, yes, I have given you this information. And against just evidence that they provided this to you. And if a client declines to provide family size and income, it's important that we're documenting that as well, right? So that there's an option for a client to say, you know what, I'm opting out. I don't wanna provide this information to you because again, going back to our slide earlier, You know, we cannot force or coerce our clients into accepting services. Our program, the Title X program, is completely on a voluntary basis.

So oftentimes, it's not uncommon, right, that we will get clients who want. They have questions, right? They want information about cost. And this is where it's so important that we have income and household size or family size because without that information, we may miscalculate what a client actually may owe or is responsible for. So without that, information we we are unable to accurately provide that information. So it may be more or less. It may be no cost at all. So without that information, it's very difficult to determine that. But again, as a reminder, we cannot deny our clients services due to the inability to pay. And again, we are never to provide a variation in the quality of services to our clients because they are not able to pay.

So moving on, let's talk about income verification procedures. So again, we mentioned this earlier, but again, it's just a good reminder because it's so important that minors who wish to receive services on a confidential basis must be considered on the basis of their own resource, right? So this doesn't mean that they're not expected to provide income information, but that they are expected to just their income information. So even if that's zero, that's still OK. That's totally acceptable. Again, once we have that income information and family size information, it's important that we are communicating to our clients about any financial responsibility that they may have in

collecting any fees at the time of visit. If needed, a payment plan can be established at the time of service if that is something that your organization practices. And then at minimum, we should be verifying or updating income verification, the process annually with all our clients. If not, it may be more frequently if there's a change, but at minimum it is best practice that we are doing that on an annual basis.

When we are verifying income, it's important that we are reassuring our clients that the reason that we're asking for this information is to determine whether or not they may be eligible for low or no cost services, right? So again, it is important that we are communicating to our clients that really we're here to help them and, you know, ensure that they are getting, you know, all the services, and we're determining, you know, if they're eligible for any programs and services that we are, that we have available to them, and that includes any discounts, or, you, know, reducing their, their, the costs for their services that day. If a client's income can't be verified after reasonable attempts, then at that point, that is when we are able to base their income on just self-declared, self-declaration or self-reported. And that is. Totally acceptable and okay, but again, this is after reasonable attempts. Now we are never to, you know, make this process a burden to our clients, but we do all we are expected to and should be making reasonable attempts and to ask and try to get this information from our clients. Again, this is another great resource that is available to you. We have the link here for you all where, again, it's defining, you know, family income for Title X, so charges, billing, and collections, and you know just some great resources and again just restating, you know, these program expectations that we are discussing today.

I want to share with you all another sample script, again, as a tool and resource, especially for your staff, so that they are comfortable with talking and explaining to our clients about the eligibility process on income. And family size information and collecting that information. So letting our clients know, and I'll read this script for you all, is that at your appointment, you'll be asked to complete some paperwork and on that paperwork, you may be asked how many people are in your family and how much money everyone makes. And using that information, your services may be at no cost to you, meaning you don't need to pay anything or you may receive services at a discounted rate. So this means that you may have to pay a certain amount. So the front desk will let you know how much you are qualified for, you qualify for before you're seen. So again, this can be communicated, you know, when our clients are scheduling appointments, when they're checking in, again, letting them know when you're giving them their paperwork. Why we're asking for this information and how that information is going to be used.

Okay, so it's really important that, you know, to, you know, when we're, let's talk about some fee assessment guidelines. And what information we need to be collecting. So it's important that we are collecting the client's income, family size, whether or not the client has insurance. And again, we want to, again, make sure that we have this information so that we're charging our clients appropriately. We're not miscalculating any fees that are for our clients, right? So we don't want them to. You know, be charged incorrectly. And for self-paid clients, if the client is self-pay, so for example, they don't have insurance, they don't want it, they choose not to use their insurance, then you would assess where they fall on your sliding fee scale and apply any associated discounts for the full fee of their services, right? So using your sliding fees scale based on the FPL, then you would determine what they're responsible for financially. Now with clients who have insurance, you still want to collect this information because you want to compare where they fall on the sliding fee scale and then compare it to what their copay is and then you need to charge the lesser amount. So, a client who has insurance would never pay more than they would if they were on the sliding fee scale, right? So again, that's something a little bit unique about Title X.

So, some guidelines around fee assessment and how to you know for collecting co-pays and applying the sliding fee scale like a schedule of discounts so again um per Title X you know clients whose family income is at or below 250 of FPL should not pay more than what they would pay otherwise when the schedule of discounts is applied so again this is an excellent resource again to you know defining that. And what that means exactly, you know, just again, what that looks like and how that could be implemented at your organization.

Okay, so again, clients who have insurance and again, this is just restating. We still need to assess some on the sliding fee discount, you know, schedule. So this is why we it's really important that we are collecting income and family size information on all our clients across the board. And to compare the co-pay amount that they are expected to pay for under their insurance plan, and then compare it to where they fall on the sliding fee scale and charge the lesser amount. And again, this is defined in that Title X expectation regarding insurance insured clients. And then we have the sliding fees scale as well.

So If a client has financial responsibility, we want to let them know clearly and accurately what they're responsible for if they have any financial responsibility. So just some sample wording that you may choose to use at your health centers. Letting them know your balance today is x amount. And then giving them the options and as far as how they can pay for those services. Right? So you can let them know, you know, how will you be paying for your services today? We accept cash check or card. So however, whatever that looks like at your organization. Again, it is a best practice and recommended that you manage fee collections at the time of visit so that you are collecting those fees upfront before they're seen and are taken to the back for their services because oftentimes, you know, once our clients are and they check out. And they leave because they're ready, they're done, they want to go home or wherever they're going to next. So really important that we are collecting any fees up front before our client is seen.

So again, just want to just dive a little bit deeper around income verification guidelines. We've talked about some of these already. But again. We are expected, you know, as Title X agencies to take reasonable measures to verify claimed income without burdening any of our clients and to assign the appropriate discount. Our service sites must accurately assess the client's family size and family income. Specify the process, you now. Based on your agency's policies and procedures, so explaining to them what does that look like and what does it mean and what is that process going to be, you know, based on your agency practices. And then make sure that you, you, know, whatever is outlined or defined within your organization, that it's uniformly implemented across all of your service sites, right, because it can be very confusing and frustrating for our clients if they are going to multiple service sites within our own organizations, and they're getting different information, right? You know, I went to clinic A and they told me that I didn't need to do this or I needed to bring that. And then they go to another service site, right, clinic B, and they're like, oh, well, you know, we don't do it like that, right? We do it. Like this here. So again, it's really important that we are providing a consistent message across the board, across all our service sites to our clients.

Also, agencies who have other lawful access to other valid means of income verification because a client is participating in another program that your organization offers, you may use that data or that information to verify income or re-verify income if it's a recent visit or they're participating in a program and you have that information, It's been updated. So that is acceptable. That way, you're not, again, reducing those barriers to our clients to be able to access services. You know, again, after you've made those reasonable efforts, it's OK to rely on the client's self-report income. Now, I also want to just kind of add a little extra here in saying that someone stating that they don't have income versus that they want to provide income is two different things, right? So I just want to clarify that because just because someone doesn't have income. Is that's different than someone refusing to provide the information. Again, after making reasonable efforts and a client cannot provide documentation or income verification, again, a client's self-reported income is allowed as a last resort. And again, the inability to verify or self-report a client's income will not jeopardize and should not jeopardized a client's visit.

You know just some reminders and some some key points and takeaways. So remember again the spirit and expectations of Title X. So again making reasonable efforts to verify income without um to verify incomes so because you know know that you are seen as a trusted safe resource for accessible, high quality sexual and reproductive. Health services, and that's why our clients are coming to us. The goal is to collect income information or data on all of our clients, regardless if they are insured or not. And then finally, per Title X expectations, a client's income can't be verified after reasonable attempts. Charges should be based on the client's self-reported income.

Here's just a list of you know some resources that we refer to today. I think that we've also are putting those in the chat as well. I encourage you to take a look at these. I think that you know they may be helpful to you all again as you're developing you know policies and procedures, as you are doing training with your staff, any onboarding. Or just updates with your staff. And then again, if you're developing any scripts or role plays or case scenarios that you might wanna use during staff training, these are some really good resources for y'all to help you in developing those.

**Caitlin Hungate:** Thanks so much and everyone please if you are not already subscribed to our monthly e-newsletter at [rhntc.org](https://rhntc.org) slash e-newsletter. Like I said if you have sample policies or scripts or resources that you want to share with your peers in today's conversation you can contact us and follow up with us and we'll follow share that out with the folks on the line. If you do not have an account please sign up on [rhntc.org](https://rhntc.org) and follow us on LinkedIn. Last but not least, thank you for your time today.

Thank you. I hope you'll join me in thanking Dania. Dania, thank you so much for your collaboration again on this critical topic that we know is a challenge at all Title X sites where services are provided. Income verification is an ongoing challenge, and we're so grateful for your expertise and insights to share with everyone. We do ask everyone to complete an evaluation for today's session. The link is in the chat. Thank you, Nancy. We really do value your feedback and use it to inform future sessions. Please do take a minute to complete the evaluation. Again, as I said at the beginning, if you are looking to obtain a certificate of completion, you'll need to be logged in to your account on [rhntc.org](https://rhntc.org) when you are completing that evaluation. As a reminder, we will have an archived recording, transcripts, and slides posted on RHNTC within a couple days, and we will follow up via email and sharing that out as well. If you have additional questions for the RHNTC, you can reach us at RHNTC at [jsi.com](https://jsi.com) again, sign up. And stay in touch with our e-newsletter, and thank you again for joining us. This concludes today's workshop. Again, thank you all for your time, your contributions, and once again, Dania, thank you for your collaboration and your expertise. Really appreciate it. Have a wonderful rest of your day, everyone.