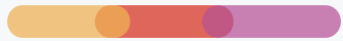




Addressing Common Confidentiality Concerns and Challenges



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Nice to meet you!



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Reproductive Health National Training Center

rhntc.org

The image shows a screenshot of the Reproductive Health National Training Center (RHNTC) website. At the top left is the RHNTC logo, which consists of a colorful circular icon and the text "RHNTC REPRODUCTIVE HEALTH NATIONAL TRAINING CENTER". To the right of the logo are navigation links: "About", "Resources", "Events", and "Connect with RHNTC". Further right is a search bar with a magnifying glass icon and the text "Search", followed by links for "Manage Account & Training" and "Log out".

Below the navigation bar is a dark red banner with the text "Looking for COVID-19 resources for family planning providers?" and a button that says "View RHNTC COVID-19 Resources".

The main content area has a teal background. It features a large heading: "Welcome to the Reproductive Health National Training Center". Below this heading is a sub-heading: "The FPNTC is now the RHNTC, your go-to source for family planning and adolescent health training and technical assistance. [Learn more](#)".

Below the text is a collage of various resources and tools, including:

- A poster titled "BIRTH CONTROL METHODS" showing different contraceptive options like IUDs, implants, pills, and condoms.
- A poster titled "CULTURAL COMPETENCY IN FAMILY PLANNING CARE" with a colorful circular graphic.
- A laptop displaying a website interface.
- A poster titled "CHLAMYDIA SCREENING TOOLKIT" with a blue background and icons.
- A clipboard with a "Preconception Counseling Checklist".
- A tablet showing a video player.
- A calculator.

At the bottom of the page is an orange banner with a white box containing the text: "Welcome to the Reproductive Health National Training Center" and "from RHNTC". Below this text is the heading "Welcome to the Reproductive Health National Training Center" and a partial view of the colorful circular logo.



Objectives



- Articulate the difference between the need for confidential billing and universal confidential services
- Describe how to accurately assess where the client falls on the sliding fee scale income for confidential billing
- Identify at least two threats to patient confidentiality

Title X Program Expectations



“Ensure that all information as to personal facts and circumstances obtained by the project staff about individuals receiving services must be held confidential and must not be disclosed without the individual’s documented consent, except as may be necessary to provide services to the patient or as required by law, with appropriate safeguards for confidentiality. Information may otherwise be disclosed only in summary, statistical, or other form that does not identify the individual. Reasonable efforts to collect charges without jeopardizing client confidentiality must be made. Recipients must inform the client of any potential for disclosure of their confidential health information to policyholders where the policyholder is someone other than the client. (42 CFR § 59.10(a))”

Source: [Title X Program Expectations](#)

Title X Program Expectations (continued)



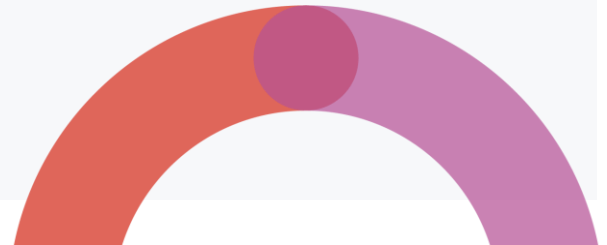
“§59.10 Confidentiality. (a) All information as to personal facts and circumstances obtained by the project staff about individuals receiving services must be held confidential and must not be disclosed without the individual’s documented consent, except as may be necessary to provide services to the patient or as required by law, with appropriate safeguards for confidentiality. Otherwise, information may be disclosed only in summary, statistical, or other form which does not identify particular individuals. Reasonable efforts to collect charges without jeopardizing client confidentiality must be made. Recipient must inform the client of any potential for disclosure of their confidential health information to policyholders where the policyholder is someone other than the client. (b) To the extent practical, Title X projects shall encourage family participation.³ However, Title X projects may not require consent of parents or guardians for the provision of services to minors, nor can any Title X project staff notify a parent or guardian before or after a minor has requested and/or received Title X family planning services.”

Source: [Title X Program Expectations](#)

Confidential services versus confidential billing



- Remember, all services are confidential except when mandatory reporting is indicated
 - Staff must adhere to the requirements of mandatory reporting
- Confidential billing relates to who has access to what billing information



Confidential billing



Confidential billing is when a patient requests that we do not bill insurance for Title X services where billing insurance may inform others of their visit and/or services provided.

- Suppression of an EOB or not billing insurance if suppression isn't possible
 - (Remember: even if an EOB is suppressed, charges against deductible, out of pocket maximums, etc. may show up in the policy holder's patient portal)
- Adolescents must be assessed based on *their* income and family size
- Best practice for Adults: Assess based on their income and family size, as well

Patients who may ask for confidential billing

- Unemancipated minors who wish for parent/guardian to not be aware of visit.
- Patients on insurance where they are not the policy holder or who share insurance plan with others.
- Patients experiencing domestic violence/intimate partner violence (IPV).
- And/or case-by-case circumstances where confidential billing is requested.



Ways confidentiality concerns may show up

- Patient asks: “Will mail be sent to my house?”
- Patient asks: “Does my parent/guardian need to know that I’m here?”
- Patient is on parent’s insurance policy.
- They show worry that the clinic will contact someone, perhaps when we ask for emergency contact.
- They have concerns about billing their insurance because they are not the only ones on the insurance plan.



Title X Program Expectations

- Assess family income before determining whether copays or additional fees are charged
- Clients at or below 250% FPL should not pay more (in copays or other fees) than what they'd pay when the schedule of discounts is applied
- Take reasonable efforts to obtain third-party payment without application of discounts

[Title X Program Expectations](#)

Collecting Copays and Applying A Sliding Fee Discount Schedule A JOB AID FOR FRONT DESK STAFF



5 Steps for Collecting Copays and Applying the Sliding Fee Discount Schedule (SFDS)

1. Find out the client's income, family size, and whether the client has insurance.
2. Check the client's insurance eligibility and determine copay amount based on their insurance plan.
3. Determine where the client's income puts them on the sliding fee discount schedule.
4. If the copay is less than the client would pay on the sliding fee discount schedule, the client should pay the copay, and the agency should bill the insurance company the fee for the services.
5. If the copay is more than what the client would pay based on the sliding fee discount schedule, the client pays what they would pay based on the sliding fee discount schedule, and the agency should bill the insurance company the fee for the services.

REMEMBER!

Per Title X requirements in the 2021 final rule, clients with insurance "whose family income is at or below 250% of federal poverty level (FPL) should not pay more than what they would otherwise pay when the schedule of discounts is applied."¹

How It Works

Below is a sample sliding fee discount schedule and two scenarios to show how to determine the copay when the client has insurance. Each year, the FPL guidelines are updated by the federal government and a Title X agency should update the dollar amounts in their SFDS. A Title X agency can also consider if they should update their SFDS discount levels and/or their FPL percentage groupings as appropriate. This is an example of how a Title X organization might group FPL levels and related discount percentages.

Sample Client:

- Your client's income is \$30,000/year.
- She has two children.
- She has insurance. Her copay is \$20.
- To apply the sliding fee discount schedule, first, match her income to your sliding fee discount schedule.
- The sliding fee discount schedule will show you the discount she would receive. In this situation, her discount would be 80%.

Table 1. 2021 Federal Poverty Level (FPL) Guidelines for the 48 Contiguous States and District of Columbia¹

Number of People in Family	Federal Poverty Levels, 2021					
	100%	125%	150%	175%	200%	251%
1	\$12,880	\$16,100	\$19,320	\$22,540	\$25,760	\$32,200
2	\$17,420	\$21,775	\$26,130	\$30,485	\$34,840	\$43,550
3	\$21,960	\$27,450	\$32,940	\$38,430	\$43,920	\$54,900
4	\$26,500	\$33,125	\$38,750	\$46,375	\$53,000	\$66,250
5	\$31,040	\$38,800	\$46,560	\$53,320	\$62,080	\$77,600
6	\$35,580	\$44,475	\$53,370	\$62,265	\$71,160	\$88,950
7	\$40,120	\$50,150	\$60,180	\$70,210	\$80,240	\$100,300
8	\$44,660	\$55,825	\$66,990	\$78,155	\$89,320	\$111,650
9+	For families with more than 8 people, add \$4,540 for each additional person.					
Discount Level	100%	80%	60%	40%	20%	0%

SCENARIO 1:

- If fee for services = \$125
- With 80% discount, fee = \$25
- Insurance copay = \$20
- Client pays \$20
- Bill client's insurance the full fee
- Insurance copay is less than the fee, client pays the copay

SCENARIO 2:

- If fee for services = \$60
- With 80% discount, fee = \$12
- Insurance copay = \$20
- Client pays \$12
- Bill client's insurance the full fee
- Discounted fee is less than the copay, client pays the discounted fee

REMEMBER!

If the client requests confidential services, do not bill the insurance company.



Steps to collecting co-pays



1. Find out the patient's income, family size, and whether they have insurance
2. Check the patient's insurance eligibility and determine copay amount based on insurance plan (may also be on insurance card if patient has it)
3. Determine where the patient's income puts them on your sliding fee schedule
4. If the co-pay is **less** than what they'd pay on the sliding fee schedule, collect the copay and bill the insurance the fee for services
5. If the co-pay is **more** than what they'd pay on the sliding fee schedule, patient pays amount based on schedule, and you bill the insurance the fee for services

We'd love to hear from you!



Describe a potential threat to patient confidentiality that you've observed or can imagine.

Share 1-2 strategies for avoiding this threat.

(Chime in, everyone!)



Potential threats to confidentiality

- Front desk staff accidentally revealing identifiable information in check-in process
- Hallway discussions with client
- Rooms not being sufficiently sound-proofed
- Clinical service provider not marking a client visit record confidential
- Billing staff sending home an EOB, bill, or other patient communication about the visit
- Test results being mailed or uploaded in a patient portal



RHNTC resources



- [Tips for Maintaining Patient Privacy and Confidentiality](#)
- [Using Supportive Language to Ensure Client Confidentiality Pocket Card](#)
- [Challenges to Patient Confidentiality - Potential Breaches Outside of the Health Center](#)
- [Collecting Co-Pays and Applying Sliding Fee Scales \(A Job Aid for Front Desk Staff\)](#)

Q&A |

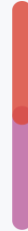
What questions do
you have for us?





rhntc.org

THANK YOU!



CONTACT US

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