

3.4 DETERMINATION OF INCOME

Policy: All Title X clinics will make every effort to determine and document all clients' correct income. Within the parameters set out by the Title X statute and regulations, Title X clinics have a large measure of discretion in determining the extent of income verification activity that they believe is appropriate for their client population. Although not required to do so, Title X clinics that have lawful access to other valid means of income verification because of the client's participation in another program may use those data rather than re-verify income or rely solely on clients' self-report.

Procedure:

Title X clinics must have a local policy describing the clinic's system for determining income for Title X clients. The local policy must meet the following standards:

1. Client income will be assessed privately and in a manner that protects the dignity of the client.
2. Income information will be obtained from every client and documented in the chart on the initial visit and will be updated at least annually. Ideally, income should be updated at each clinic visit.
3. Title X clinics may **request** proof of income at the program's discretion, but **they may not require it**. If a client has no proof of income, but provides a self-declaration of income, the Title X clinic should accept the self-declaration and charge the client based upon what they have declared. Title X clinics may not assess the client at 100% of the charge because they do not have proof of income, as this may present a barrier to the receipt of services.
4. Clients unwilling to provide income information will be charged the full (100%) cost of the services.
5. For the purpose of considering payment for contraceptive services only, where a woman has health insurance coverage through an employer that does not provide the contraceptive services sought by the woman because the employer has a sincerely held religious or moral objection to providing such coverage, the project director may consider her insurance coverage status as a good reason why she is unable to pay for contraceptive services. In making that determination, the project director must also consider other circumstances affecting her ability to pay, such as her total income. The project director may, for the purpose of considering whether the woman is from a "low income family" or is eligible for a discount for contraceptive services on the schedule of discounts, consider her annual income as being reduced by the total annual out-of-pocket costs of contraceptive services she uses or seeks to use. The project director may determine those costs, or estimate them at \$600.

A sample policy with additional best practices can be found in the MT TX FP Administrative Manual, Policy 8.8 *Sample Determination of Income Policy*.

Adolescents

1. Title X clinics should not have a general policy of no fee or flat fees for the provision of services to minors, or a schedule of fees for minors that are different from other populations receiving Title X family planning services.
2. Unless an adolescent is completely emancipated under state law, determinations as to ability to pay should be based upon the adolescent's family income. Only when an adolescent is unable to pay for services without having to inform their parents and the adolescent requests services on a confidential basis should the project look solely to the adolescent's income. In such cases, all appropriate and applicable income available to the adolescent should be considered in evaluating the adolescent's ability to pay for services.
3. When an unemancipated minor wishes to receive services on a confidential basis, the Title X provider must document in the minor's medical record the specific actions taken by the provider to encourage the minor to involve their family in their decision to seek family planning services.

4. Documentation of such encouragement is not to be required if the Title X provider has documented in the medical record:
 - (i) That it suspects the minor to be the victim of child abuse or incest; and
 - (ii) That it has, consistent with, and if permitted or required by, applicable State or local law, reported the situation to the relevant authorities. (42 CFR 59.2).
5. The following can be used as a guide to determining adolescent income in a variety of situations:

Adolescent's income should be used when:

- a. The adolescent is self-supporting
- b. The adolescent is supported by a parent or guardian, but requests confidential services,
OR
- c. The adolescent is supported by a parent or guardian, but parents are unwilling to pay for services

Family income should be used when:

- a. The adolescent is partially or completely supported by a parent or guardian who is willing to pay

INCOME SOURCES FOR TITLE X SERVICES

Do consider	Don't consider
Wages	Social security disbursements
Salary	Food or rent in lieu of wages (if not claimed on taxes)
Training stipends	Military allotments
Net receipts from self-employment (after deductions for business expenses)	Tax refunds
Strike benefits from union funds	Child support
Capital gains	Lump-sum inheritances
Alimony	One-time insurance payments or compensation for injury
Gifts (over \$14,000)	Non-cash benefit such as: Employer-paid or union-paid portion of health insurance; other employee fringe benefits
Regular support from absent family member or someone not living in the household	Assistance from Federal Aid Programs like Medicaid, Food Stamps, public housing, TANF, SSI
Private pensions	
Regular insurance or annuity payments	
Income from dividends	
Interest rent, royalties	
Food or rent in lieu of wages (if claimed on taxes)	
Assets drawn down as bank withdrawals (if claimed on taxes)	

Do consider	Don't consider
Proceeds from sale of house car or property (if claimed on taxes)	
Periodic receipts from estates or trusts (if claimed on taxes)	

Adapted from the Affordable Care Act (ACA) Medicaid Eligibility Criteria