

Applying Your Agency's Schedule of Discounts Workshop

February 11, 2026



New York State
Family Planning
Training Center
nysfptraining.org

Speakers



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Learning Objectives

By the end of this session, participants will be able to:

- Accurately describe New York State Department of Health expectations for using a schedule of discounts for clients between 101–250% FPL
- Apply at least one strategy to support front desk staff in collecting client income
- Identify one resource that supports staff in correctly applying their agency's sliding fee scale

Agenda

- NYSFPP and Title X program expectations
- Q&A
- Group scenarios to practice
- Challenging Case Discussion
- Q&A

Lessons from Federal Program Review

- Clients who self-disclose income but do not provide verification should be placed on the schedule of discounts
- Need to ensure EHR scales reflect accurate FPL and discount percentages
- Flat fee scales may not cover the reasonable cost of some higher priced services/equipment (e.g., LARCs)



ICYMI: Title X Front Desk Income Verification Workshop for Family Planning Providers

Access the slides and recording here:

<https://nysfptraining.org/events/x-front-desk-income-verification-workshop-for-family-planning-providers/>



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Terminology



Understanding Terms

- **Fee(s) or charge(s):** Used interchangeably in the medical/health care field and in Title X.
- **Fee schedule** (i.e., a full fee schedule, charge schedule, chargemaster): In Title X it is called "schedule of fees." **A fee schedule is an industry-wide concept; it is not specific to Title X.**
 - Lists out the FULL cost for each service (typically by CPT code), which includes your costs, private insurance, local markets, and/or Medicare rates. See RHNTC [Title X Project Cost Gathering Workbook and job aid for more information](#)
 - Also based on a clinic's cost determined through cost analysis or other methodology (per Title X expectations).
 - For more information about setting a full fee schedule, see RHNTC's [Setting a Full Fee Schedule Job Aid](#)



Understanding Terms (cont'd)

- **Contracted rate:** Industry-wide term for the rate that each payer agrees to pay for a given service.
The contracted rate can and vary across payers.
 - Example: The fee schedule says a service is \$125 (and this is what is billed to all payers). Aetna's contracted rate is \$120; Blue Cross is \$115. The difference between the full fee (\$125) and the contracted rate (e.g., \$120 or \$115) is written off.
- **Schedule of discounts** (i.e., sliding fee discount schedule): An agency's listing by federal poverty level (FPL) ranges (e.g., 101–125% FPL, 126–175% FPL, etc.) with corresponding related discounts to ensure that low-income individuals pay based on their ability (assessing family size and income).
 - **This is specific to Title X.** Other federal programs (e.g., FQHC/330 Program) and state programs have different expectations for this.



NYSDOH Program Requirements

Schedule of Discounts



NYSDOH Expectations

“All subrecipients must develop and utilize a Schedule of Discounts (SOD) that allows patients to pay reduced fees/charges for any visit, procedure, medication, or device based on their income to ensure cost is never a barrier to receiving family planning services”

Income Verification a Necessary First Step

- Income verification is required to determine where a client would fall on your agency's schedule of discounts (or sliding fee scale).
- Agencies must verify or assess income in order to:
 - **For clients without insurance:** Ensure they are not being over- or undercharged based on your agency's sliding fee scale
 - **For clients with insurance:** Ensure they are paying the LESSER amount of either their copay (and/or deductible) compared to the amount they would pay based on the sliding fee discount schedule

What NYSDOH Expects

- No charges for any service, devices, or supplies for patients below 100% FPL
- No charges for patients at or below 250% for the following services:
 - Chlamydia testing
 - HIV testing and counseling
 - Pregnancy testing and counseling
 - Emergency contraception
- Free condoms for patients through NYS condom program

Source: [NYSDOH Policy and Procedures, 6.3](#)

What NYSDOH Expects

- Prior to issuing a sliding fee, provider must ask for proof of income
- Verification of client's income is not a requirement for issuing a sliding fee and should never be a barrier to care
- Eligibility for discounted fees must be documented in the client's record and must be evaluated at least annually
- Information on income should be collected and documented for every client
- Insured clients whose family income is at or below 250% FPL should not pay more in copayments or additional fees than what they would otherwise pay when the schedule of discounts is applied

Source: [NYSDOH Policy and Procedures, 6.4](#)

Fee Waiver

“Fees must be waived for individuals with family incomes above 100% FPL, who as determined by the family planning manager, are unable, for good cause, to pay for family planning services.”

- Examples of hardship include (but are not limited to):
 - Recent loss to home or property, such as a house fire
 - Other medical debt
 - Other reasons as accepted by the project director

Resource: [NYSDOH Policy and Procedures, 6.4](#)

Determining Your Slide Amounts

NYSDOH does not specify how many discount categories your sliding fee scale must have, only that:

- People at and under 100% FPL have their fees fully discounted; and
- People with incomes greater than 250% pay the full fee on the fee schedule

Most sliding fee scales have a minimum of three to four discount categories, but you may have as many as your agency determines is sufficient so that cost is not a barrier to service.

Options for Creating Schedule of Discount



Option for SOD: Discount Percentage

Pros

- Potential for greater revenue generation
- May reflect more accurately the costs of a service
- For clients requesting a less expensive method (e.g., pills), fees will be based on exactly the services and supplies received

Cons

- Higher cost services (e.g., implants and IUDs) may be out of reach for clients
- Clients may not be able to obtain information on costs until after the visit

Slide Example 1

Family Size	Rate A - fully discounted	Rate B - 75% Discount	Rate C - 50% Discount	Rate D - 25% discount	Rate E - no discount
	At or under 100%	101%–150%	151%–200%	201–249%	250% and up
1	\$15,560	\$15,561 – \$23,475	\$23,476 – \$31,300	\$31,301 – \$37,649	\$37,650
2	\$21,150	\$21,151 – \$31,725	\$31,726 – \$42,300	\$42,301 – \$51,099	\$51,100

Option for SOD: Flat Fee

Pros

- When a client calls, agency will be able to identify charges to the client based on their family size and income (not dependent on the overall services received)
- Client may be able to get their method of choice, regardless of cost

Cons

- Flat fee may not reflect the costs of specific services provided, but rather an average of costs

Slide Example 2

Family Size	Rate A - fully discounted (\$0)	Rate B - \$25	Rate C - \$50	Rate D - \$75	Rate E - \$100
	At or under 100%	101%–150%	151%–200%	201–249%	250% and up
1	\$15,560	\$15,561 – \$23,475	\$23,476 – \$31,300	\$31,301 – \$37,649	\$37,650
2	\$21,150	\$21,151 – \$31,725	\$31,726 – \$42,300	\$42,301 – \$51,099	\$51,100

Collecting Copays and Applying SOD



5 Steps in the Process

For collecting copays and applying the sliding fee discount schedule

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.

Resource: [Collecting Copays and Applying Sliding Fee Scales: A Job Aid for Front Desk Staff](#)



Sample Client

- Your client's income is \$30,000 per 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 Columbia²

Federal Poverty Levels, 2021						
Number of People in Family	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	\$39,750	\$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%

Example

- If the fee for services = \$125
- With an 80% discount, the 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

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9+	For families with more than 8 people, add \$4,540 for each additional person.					
Discount Level	100%	80%	60%	40%	20%	0%

Example

- If the fee for services = \$60
- With an 80% discount, the 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

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Confidentiality



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Confidential Billing for Unemancipated Minors

Distinguish between **confidential services** and **confidential billing**.

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

Other Clients Who May Need or Ask for Confidential Billing

- An adult age 18 to 26 on their parent's insurance
- An adult who is not the policyholder
- A client experiencing intimate partner violence, domestic violence, or any other threat or concern
- Other circumstances (evaluate case by case)

How Confidentiality Concerns May Show up

- A client asks: “Is there going to be mail sent to my house?”
- A client asks: “Does my parent/guardian need to know that I’m here?”
- A client shows worry you will contact someone, e.g., when you ask for their emergency contact.

Q&A



Test Your Knowledge - Scenarios



Practice Situation #1

- Client presents paystubs showing they gross \$1,500 every 2 weeks (26 paychecks a year).
- Client has 2 dependents.

Where does the client fall on the sliding fee scale?

- Client has insurance with a \$50 copay.
- Their services today come to \$210.

What does the client owe?

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Discount Level	100%	80%	60%	40%	20%	0%

Practice Situation #1 - Answer

- Client presents paystubs showing they gross \$1,500/every 2 weeks (26 paychecks per year)
- Client has 2 dependents.

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Challenging Cases



Challenging Cases

What We've Heard From You:

- Working for a system that has different policies around sliding scale than NSYDOH
- When a client doesn't give income information, we don't have all the information we need
- Client claiming \$0 and no way to verify
- Adolescents who want privacy and are unable to provide parents information
- Other concerns of data being shared (e.g., client privacy)
- Clients not liking filling out a form
- Clients not bringing in proof of income

Q&A



Wrap-up



Resources

- [Collecting Copays and Applying Sliding Fee Scales: A Job Aid for Front Desk Staff \(RHNTC\)](#)
- [Defining Family Income for Title X Charges, Billing, and Collections Job Aid \(RHNTC\)](#)
- [Title X Policy Templates \(RHNTC\)](#)
- [Verifying Client Income: What are “Reasonable Efforts”? Job Aid \(RHNTC\)](#)
- [Sample Scripts for Verifying Income \(RHNTC\)](#)

Thank you!

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