DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Secretary

Assistant Secretary for Health
Office of Public Health and Science
Office of Population Affairs
Washington DC 20201

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TO: Regional Health Administrators, Regions I – X

FROM: Acting Director, Office of Population Affairs

SUBJ: OPA Program Instruction Series, OPA 08-1: Verification of Income for Title X Clients

The purpose of this Program Instruction is to provide guidance to Title X grantees regarding the extent of their discretion in verifying the family income of clients seeking services in Title X-funded clinics. Within the parameters set out by the Title X statute, regulations and Program Guidelines, Title X grantees have a large measure of discretion in determining the extent of income verification activity that they believe is appropriate for their client population. Written policies should be developed by grantees regarding verifying family income within the Title X project. Policies should be developed that embrace the mission and purpose of Title X, including that priority for services is to be given to persons from low-income families (as defined in the Title X regulations at 42 CFR 59.2), and that the inability to pay must not be a barrier to the receipt of services.

Grantee policies and procedures for documentation of family income will be reviewed by the Regional Health Administrator, and procedures for implementing will be monitored during site visits and comprehensive program reviews. In addition, policies and procedures for income verification should be reviewed and approved by the governing authority or board of the grantee organization.

Although not required to do so, grantees 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 client's self report.

This Program Instruction is being issued in response to recent questions for clarification regarding methods which may be applied to verify family income, and to ensure that Title X resources are properly directed. All requirements regarding fees and charges set out in the Title X statute and regulations, as well as all guidance regarding fees and charges provided in the Title X Program Guidelines and previously-issued Program Instructions remain in effect.

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cc: Regional Program Consultants, Regions I-X