



## Board Training Discussion Guide: Sliding Fee Discount Program – Fundamentals for Health Center Boards

### Purpose

The Board Training Discussion Guide is designed as an opportunity for participants to expand on what they learned in the e-learning module Sliding Fee Discount Program – Fundamentals for Health Center Boards. The discussion guide can assist facilitators in engaging board members in dialogue after they have viewed the module. Keep in mind that sharing takeaways with others is a key method to remember what is learned and inspire new ideas.

### Let's Get Started!

As you begin, be mindful of time and be sure to know everyone's name and title. Facilitators should remind board members that there is always more to learn about health center governance and encourage participants to ask questions at any point. If conducting a virtual training, consider using polls or the chat feature to gather feedback and engage your audience. If questions have been submitted ahead of time, use them as conversation starters or include them in the appropriate topic areas. As you go through the discussion guide, confirm that the questions have been addressed before going to the next question. Lastly, write down any follow-up questions that may be asked.

To kick off discussion, invite members to share a one-two minute reaction to the e-learning module.

- What do you think about your role in evaluating the Sliding Fee Discount Program (SFDP)?
- What are the concepts you identified in the module that you feel confident in applying?
- What concepts do you find challenging and may need help with?

### Discussion

After initial reactions are shared, acknowledge everyone's comments, and highlight topics from the module that participants mentioned. Remind participants that the board plays a very important role in the SFDP. Then process what was learned in the module using the following questions to prompt participant feedback:

### Module Introduction

[Health centers](#) are community-based organizations that deliver affordable, quality, comprehensive, primary health care services to patients across the U.S. One of the unique features of health centers is that they provide services regardless of patients' ability to pay. This is why the SFDP is so important to the health center's mission. Questions to discuss as a group include:

- How much familiarity did you have with the SFDP prior to completing the module?
- Have you taken part in board discussions and review of the SFDP?
- If so, when was the last time the SFDP was on the meeting agenda? What types of issues were discussed?

### The Importance of the SFDP

The SFDP is a requirement of the [Health Resources and Services Administration \(HRSA\) Health Center Program](#). The SFDP ensures that all patients have access to affordable, high-quality health care and removes financial barriers so that patients do not build up a large amount of medical debt.



Questions to discuss as a group include:

- Describe the SFDP in your own words.
- Have you seen ways that patients benefit from the SFDP? If so, how?
- How does the SFDP protect the financial well-being of patients who are eligible for the program and receive the discount?

## HRSA Requirements

The board's authority to adopt, evaluate and approve updates to the SFDP is described in [Chapter 19 Board Authority of the HRSA Health Center Compliance Manual](#). Board members should also understand requirements listed in [Chapter 9 Sliding Fee Discount Program Demonstrating Compliance Part L](#), which instructs the health center to evaluate the SFDP at least **once every 3 years**, including assessing utilization and other data, and making changes as needed.

As a group, answer these questions to check your understanding of key HRSA requirements for their oversight of the SFDP. Responses are included for each question.

- **Is your health center required to have an SFDP? If so, how often is it reviewed for compliance?** All health centers must have a sliding fee discount program that applies to all required and additional health services that have a fee within the health center's HRSA approved scope of project. ***This should be reviewed every three years to remain in compliance.***
- **What sliding fee schedules must be used in a SFDP and how are they applied to patients?** The center must have a schedule of fees for the delivery of its services that is consistent with locally prevailing rates and designed to cover its reasonable costs of operation. Additionally, the center must have a schedule of discounts that applies to all patients uniformly and guides how fees are adjusted based on a patient's ability to pay.
- **What guidelines are used to create the basic income eligibility under the SFDP?** Income eligibility must be based on the most recent federal poverty guidelines, or FPG, and should reflect annual income levels below which a person or family is considered to be living in poverty and based on family size.
- **How are discounts applied to patient groups and separated by service types?** The health center's schedule of discounts must include a full discount or set nominal flat fee for individuals and families with incomes at or below 100% of the FPG. Partial discounts can be provided for those above 100% of the FPG and under the 200% of FPG. Between 100% and 200% of the FPG, there must be at least three classes or levels of discounts, based on different service types (i.e., medical vs. dental).

Ask board members to take a moment to look through the [Health Center Compliance Manual Chapter 9, in particular Compliance Part L](#), if needing to review the key requirements.

## Tips for Health Center Boards

Be sure as a group to consider the importance of the SFDP to your health center's mission. Important questions that board members can ask during the review and evaluation of the SFDP are listed below. As a group, go through these questions and ask if any of the topics have been an issue during recent board discussions of the SFDP. Responses are included for each question.



- **How are board members oriented and trained on SFDP?** Health center boards should ensure that all board members understand why the SFDP is important and could even recommend it be included as part of the new member orientation.
- **How often is SFDP review scheduled in the annual workplan or calendar?** A review of the SFDP should be included in the board's workplan and **reviewed at least once every three years.**
- **What new data is needed to evaluate the SFDP? Is the program working effectively and following FPG?** SFDP data will help the board and staff determine if patients are using the program. The data reviewed may include utilization numbers, patient satisfaction reports, and patient evaluations on the affordability of the fees involved to determine if there are barriers to care related to program expenses or if any changes to the schedule of discounts needs to be made.
- **What is the health center's process to waive charges?** The health center must also have a process to waive or reduce charges, even nominal fees, due to a patient's inability to pay. The board should ensure this is in place to remove any financial barriers to patients.

Ensure all discussions and approvals are documented in the board's meeting minutes, and explicitly linked to the health center's mission and board member's role.

## Act

As a whole group, use this time to invite participants to share what they learned from the conversation – new insights, “aha” moments, more questions to consider. This is a good moment for members to share their takeaways and connect with one another.

- As a collective board, what are 1-2 things you can do now that will help you provide better oversight of the SFDP?
- Any takeaways from this discussion or module?

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*Note: This Board Training Discussion Guide serves as an accompanying resource to the Sliding Fee Discount Program – Fundamentals for Health Center Boards developed by the National Association of Community Health Centers (NACHC). The module can be accessed on the Health Center Resources Clearinghouse at <https://www.healthcenterinfo.org/details/?id=4061>*

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## Resources

Board authority for oversight of Sliding Fee Discount Program are integrated within the [Health Center Program Compliance Manual](#) and the [Health Center Program Site Visit Protocol](#).

Access the Health Center Program Compliance Manual here:

- <https://bphc.hrsa.gov/sites/default/files/bphc/programrequirements/pdf/hc-compliance-manual.pdf>

Access the Health Center Program Compliance Manual in Spanish here:

- <https://bphc.hrsa.gov/sites/default/files/bphc/programrequirements/pdf/health-center-manual-spanish.pdf>

Access the Health Center Program Site Visit Protocol here:

- <https://bphc.hrsa.gov/sites/default/files/bphc/programrequirements/pdf/site-visit-protocol.pdf>