



DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF PUBLIC HEALTH

ROY COOPER  
GOVERNOR

MANDY COHEN, MD, MPH  
SECRETARY

DANIEL STALEY  
DIRECTOR

April 6, 2018

MEMORANDUM

TO: Local Health Directors

FROM: Belinda Pettiford, Branch Head  
Women's Health Branch

A handwritten signature in cursive script, appearing to read "Belinda Pettiford".

RE: Title X - Collections and Debt Set-Off

We have received numerous questions pertaining to collections and debt set-off for clients receiving Family Planning services under Title X. Our team reached out to the Office of Population Affairs to gain further clarification. Below is the guidance that we have received.

*Q. Agencies have asked us if it's okay to send clients' information to collection agencies and/or debt set-off, and how to handle confidential clients.*

*A. Yes, it is generally permissible for an agency to refer clients to collection agencies and/or debt set-off. However, "confidential" patients/clients should only be referred to Debt Collections and/or Debt Set-off, if the Grantee, and/or it's subrecipients (including service sites) can ensure that the client's "confidential" status will NOT be compromised by going through the Debt Collection or Debt Set-off process. If "confidentiality" cannot be guaranteed, a "confidential" patient/client should NOT be referred to Debt Collections and/or Debt Set-off.*

Should you have additional questions, please contact our Family Planning Nurse Consultant, Debbie Farb, at [Debbie.farb@dhhs.nc.gov](mailto:Debbie.farb@dhhs.nc.gov).

Thanks for your ongoing work in supporting families in your community.

C: Kelly Kimple, WCH Section Chief  
Phyllis Rocco, LTAT Branch Head