

POLICY

RED FLAG POLICY

Policy 2017

This policy implements measures to detect, prevent, and mitigate identity theft as required by the “Red-Flag” rules issued by the Federal Trade Commission (FTC). Bullhook Community Health Center patient accounts are covered by the Red Flag rules as “covered accounts” because we allow patients to defer full payment with or without the imposition of interest or carrying charges. That practice constitutes “extending credit” under the regulations and is subject to the regulation.

This policy includes the four basic elements required by the FTC Red Flag rules:

- Identify Red Flags
- Detect Red Flags
- Respond to Red Flags
- Periodically Update Program

Identifying Red Flags

Red Flags during the patient registration process may include:

- Insurance card that is not in the name of presenting patient
- Providing an insurance number but not an insurance card
- Identification that looks altered or forged
- The photo or physical description on the card does not match the person presenting the card.
- Information on the identification differs from what the person is telling you – address, telephone number, social security number, etc.
- A social security number or insurance policy number that duplicates a social security number or insurance policy number already in the system as a patient.

Red Flags which may be identified during the clinical process include:

- Information furnished by the patient which is inconsistent with the medical record
- Physical characteristics or complaints which are inconsistent with the medical record

Red Flags during the billing process may include:

- Mail sent to the customer is returned as undeliverable although the customer continues to charge to the account.
- A customer complaint that he/she isn't receiving a statement in the mail, although there is a balance on the account.
- A customer complaint about unknown charges on the account.

Other *Red Flags* may include:

- Notification by patient or law enforcement personnel that identify theft has occurred in other areas of this person's life.
- Notification by any agency or person that identity theft has been committed via the clinic.
- Request for change of address by telephone, email, or postal service.
- Patient requesting patient-related information via telephone.

Detecting Red Flags

- Because of the nature of our business and our community, most of our clients are known to us by facial recognition and do not require presentation of photo ids.
- All new patients must provide information on new patient forms and a photo id.
- Returning patients must provide insurance cards during check in.
- All staff members must be alert to any information or circumstance which is inconsistent with existing records or practices.
- Staff members will not simply "accept" information as presented, but view it with a critical eye for variances to common knowledge or practice.
- Telephonic requests for patient-related information or changes to address or insurance must be verified by patient providing two relevant pieces of information, such as date of birth or billing address.

Responding to Red Flags

- Because an aggressive course of action could conflict with the mission of providing health care to those who genuinely need it, red flag situations will be handled with discretion.
- A staff member detecting a red flag will first attempt to verify/collect the correct information directly from the patient.
- Staff members are encouraged to consult each other, electronic records, insurance websites, and other tools to verify questionable information or actions.
- If health center staff believes that a presenting patient is utilizing false documents/stolen identify, that staff member will notify a department manager and the Chief Executive Officer. The department manager will arrange for patient triage to determine whether the patient will suffer from being denied care or services. Any medical record created with the questioned identity will be given a patient status of "Red Flag" until verification is made. After required care is rendered, the patient will be referred to the Chief Executive Officer.
- The Chief Executive Officer will make the decision as to the required response, including notification of law enforcement.

Implementing and Updating the Program:

- The Chief Executive Officer will be designated by the Board of Directors to oversee the Red Flag Program.
- The Chief Executive Officer will educate the clinical staff on the requirements of the Red Flag Program.
- Incidents involving identify theft will be reported through the health center's incident reporting system and briefed to the Board of Directors periodically as part of that program.
- The Red Flag Policy will be reviewed by the staff and Board of Directors biennially as part of the health center's policy review process.

Kendra Hall

CHIEF EXECUTIVE OFFICER

Date: 3/9/2020

Debi K. Rhines

CHAIR, BOARD OF DIRECTORS

Date: 3-9-2020

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