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Policy

It is the policy of greenwich adolescent medicine, LLC (hereafter, GAM) to follow all federal and state laws and reporting requirements regarding identity theft. Specifically, this policy outlines how GAM will (1) identify, (2) detect and (3) respond to "red flags." A "red flag" as defined by this policy includes a pattern, practice, or specific account or record activity that indicates possible identity theft.

It is the policy of GAM that, pursuant to the existing HIPAA Security Rule, appropriate physical, administrative and technical safeguards will be in place to reasonably safeguard protected health information and sensitive information related to patient identity from any intentional or unintentional use or disclosure.

Procedures

I. Identify red flags. In the course of caring for patients, GAM may encounter inconsistent or suspicious documents, information or activity that may signal identity theft. GAM identifies the following as potential red flags, and this policy includes procedures describing how to detect and respond to these red flags below:

1. A complaint or question from a patient based on the patient's receipt of:
 - A bill for another individual;
 - A bill for a product or service that the patient denies receiving;
2. A complaint or question from a patient about the receipt of a collection notice from a bill collector.
3. A dispute of a bill by a patient who claims to be the victim of any type of identity theft.
4. A notice or inquiry from an insurance fraud investigator for a private health insurer or a law enforcement agency, including but not limited to a Medicare or Medicaid fraud agency.

II. Detect red flags. GAM practice staff will be alert for discrepancies in documents and patient information that suggest risk of identity theft or fraud. GAM will verify patient identity and address at the time of patient registration/check-in.

1. When a new patient calls to request an appointment, the patient will be asked to bring identification such as a driver's license or other photo ID. Identification will be verified upon registration.
2. If a patient has not completed a registration form within the last six months, staff will verify current information on file and, if appropriate, update the information.
3. Staff should be alert for the possibility of identity theft in the following situations:
 - The photograph on a driver's license or other photo ID submitted by the patient/parent does not resemble the patient/parent, or identification or other documents appear altered or forged.
 - An address or telephone number is discovered to be incorrect, non-existent or fictitious.

III. Respond to Red Flags. If an employee of GAM detects fraudulent activity or if a patient claims to be a victim of identity theft, GAM will respond to and investigate the situation. As necessary,

1. The patient's bill will be corrected.
2. It will be noted in the patient's medical record that the patient was a victim of identity theft/fraud, and whether any medical information regarding someone else was co-mingled as a result of the identity/medical identity theft against the individual. The patient's record will be corrected to assure that future medical care won't be jeopardized in any way by the inclusion of any false information in the patient's office record.

This Identity Theft Prevention and Detection and Red Flags Rule Compliance Program is approved by Dr. Marcie Schneider as of May 1, 2009.