

## Identity Theft Prevention Program for Carolly Marks ARNP MN

(The term “staff” refers to C. Marks)

- A. Staff will ask patients to provide identification at the first session.  
Staff will request documentation of identity and make a photo copy of that identification provided:  
Divers license, passport, government issued photo ID.  
If the photo ID does not contain a current address, please provide other evidence of a current address.  
Also copied will be a copy (s) of current insurance you wish to use.
- B. Staff will be alert to and act on evidence of fraud.  
Suspicious activity may include documents that may appear altered or forged, information inconsistency, and suspicious change of address notice, evidence that paper or electronic records have been compromised.

Staff shall act upon suspicious activity or evidence of identity theft by checking with other providers in the building regarding suspicious events. If a suspicious change of address occurs staff will consider whether such a change is consistent with information provided in therapy. Staff will contact the client to verify the suspicious information. If suspicions remain after the above measures, local law enforcement may be notified with client permission. Additionally passwords on electronic record accounts that may have been compromised will be changed and clients will be notified when it appears they may have been victims of identity theft.

- C. Staff will respond to reports of identity theft to clients, law enforcement agencies or others as appropriate including the identifying situations previously listed.
- D. If business associates (billing services, collection agencies, accountants handle patient information they will be asked to sign an addendum to the business associate contract that is already in place as part of the HIPAA Privacy Rule/Security Rule compliance. If no such contract is currently in place the associate will be asked to sign a standalone agreement or provide a copy of its own Red Flags Program and state that such Program meets the requirements of the Red Flag Rules.
- E. Staff will re-evaluate these policies periodically. Annually policy will be evaluated for effectiveness based on staff’s actual experience with suspected or real identity theft and in light of any new information learned by staff regarding identity theft risks.

2009-2010