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501 C3 Non-Profit Rural Health Center

## Red Flag Rule Notice

*It is the policy of Orcas Family Health Center to follow all Federal and state laws and reporting requirements regarding identity theft.*

Companies that extend credit must have a written program to prevent identity theft, as well as to detect and respond to warning signs (“red flags”) of such thefts, as set forth in the Fair and Accurate Credit Transactions Act of 2003. Physician practices bill patients and insurance companies and are thus considered creditors by the Federal Trade Commission. Therefore, we must comply with this Act.

“Red Flags” are warning signs that suggest possible identity theft; a red flag may be a pattern of suspicious behavior or a specific instance. Orcas Family Health Center will (1) **identify** red flags, (2) **detect** red flags, and (3) **respond** to probable or actual identity theft.

Orcas Family Health Center will follow several procedures to verify the identities of our patients.

1. When making an appointment for a patient, we will ask the patient to bring the following documents to her/his appointment:
  - a. Her/his driver’s license or other photo ID
  - b. Current health insurance card
  - c. If the address on the patient’s photo ID is different from their present address, a copy of a utility bill or other correspondence showing their current address
2. At check-in, we will ask patients to produce these same documents. Established patients who are known to the front office will not be required to produce such identification.
3. Returned patient mail and statements will be monitored for discrepancies.
4. Our business office/billing staff will be on special alert for financial red flags.
5. Providers and nursing staff will be on alert for discrepancies that occur during patient care.

Orcas Family Health Center has established a protocol for responding to and reporting red flags. For more information on how we do this, please feel free to ask for a copy of our *Red Flag Rule/Identity Theft Compliance Program*.

*Last Update 11/14/18*

