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RED FLAG RULES CHECKLIST

1. We have... Designed and implemented a comprehensive and fully compliant Identity Theft Program which:

- a** Demands organization-wide adherence no later than December 31, 2010 as designated by the Program approval we have sought and received from our Board of Directors.
 YES NO
- b** Designates senior management oversight of the program.
 YES NO
- c** Incorporates all existing relevant policies and procedures.
 - HIPAA Data Security
 - Fraud and Abuse YES NO
- d** Defines and documents our defined “Red Flags” and the procedures to detect and respond to them.
 YES NO
- e** Ensures that we have flagged, investigated and properly reported address discrepancies to the appropriate agencies.
 YES NO
- f** Has incorporated documentation which outlines the specific requirements for comprehensive education and competency testing of all appropriate employees.
 YES NO
- g** Sufficiently guards all patient’s identifying documents from those who do not have a need to know.
 YES NO
- h** Includes the appropriate triggers and follow-up steps to notify victims about potential data breaches and/or medical identity theft incidents.
 YES NO
- i** Incorporates protocols for reviewing our Program effectiveness and modifying it as necessary after our initial implementation.
 YES NO
- j** Requires periodic updates to reflect changes in risk areas that our Program identifies related to our patients’ and your own exposure related to identity theft.
 YES NO

2. We have... taken the most effective steps to increase our community's awareness of identity theft crimes taking place in the healthcare arena which has included specific information and guidance regarding:

a The benefits for them in requesting a full copy of their healthcare files from all providers where they have been treated.

YES NO

b The importance of guarding their insurance and Medicare/Medicaid card numbers – just as carefully as they do their Social Security Numbers.

YES NO

c The benefits of requesting an annual listing of all benefits that were paid by their insurers to verify that benefits were paid only for services they actually received.

YES NO

3. We have... educated all of our employees and tested their competency on our Red Flag program policies and our detailed procedures with special attention given to:

a Exactly what to do to determine if the patient is who he/she says they are.

YES NO

b The most common "Red Flag" situations and what to do when there is any possibility that a "flag has been tripped."

YES NO

c Increasing awareness on the need for secure features on laptops, desktops, and all other computing devices.

YES NO

4. We have... taken the necessary steps as a leadership team to inspire each one of our employees to do everything they possibly can to guard our patients' identity as if it were their own.

YES NO