

# Preventing Medical Identity Theft

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*Information taken from :*

*Red Flag and Address Discrepancy  
Requirements:  
Suggestions for Health Care Providers*

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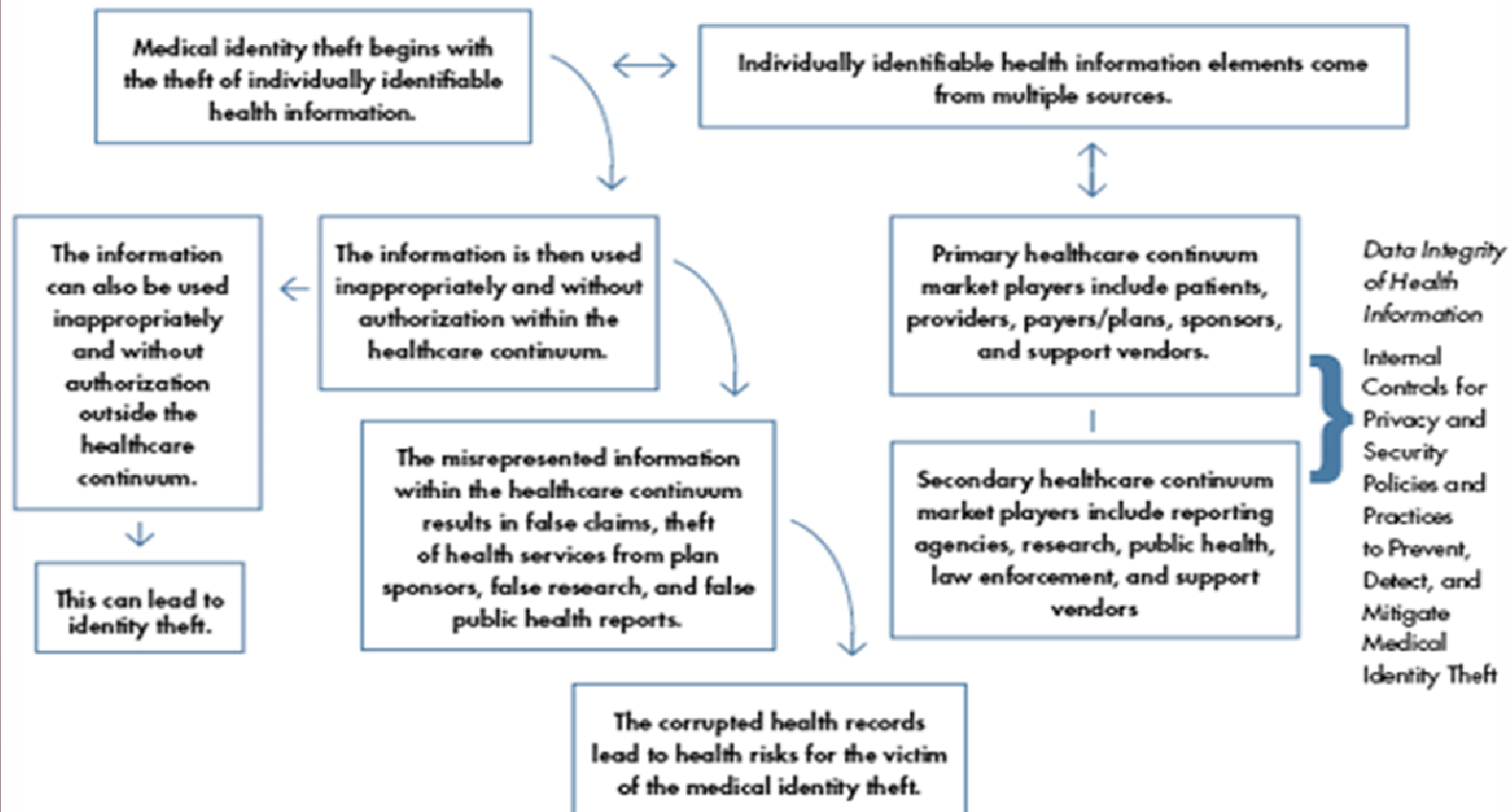
## WHAT IS MEDICAL IDENTITY THEFT?

- Medical identity theft occurs when someone uses a person's name and sometimes other parts of their identity -- such as insurance information -- without the person's knowledge or consent to obtain medical services or supplies, or
- Uses the person's identity information to make false insurance claims for medical services or supplies.
- Medical identity theft frequently results in incorrect entries being put into existing medical records, and can involve the creation of false medical records in the victim's name.

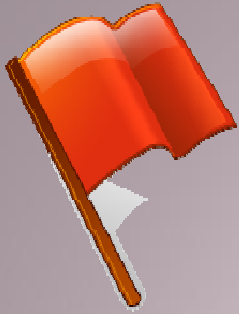


# EFFECTS OF MEDICAL IDENTITY THEFT

## The Cascading Effect of Medical Identity Theft



The effects of medical identity theft cascade throughout the healthcare continuum. Beyond being used to submit false claims, false data make their way into oversight agency databases, skewing public health findings. Ultimately, corrupted data in the victim's medical record may place the individual at risk in future treatment.



## WHAT IS A “RED FLAG”

- A “Red Flag” is a warning that there may be identity theft occurring.
- The Medical Identity Theft program must include appropriate red flags that, when triggered, lead to special organizational procedures.
- Red Flag rule is enforced by:
  - Federal Trade Commission (FTC)
  - Federal bank regulatory agencies
  - National Credit Union Administration



## WHAT CAN SAINT ANTHONY DO TO PREVENT IDENTITY THEFT?

- Develop and implement a Medical Identity Theft prevention program that complies with the Red Flag rules

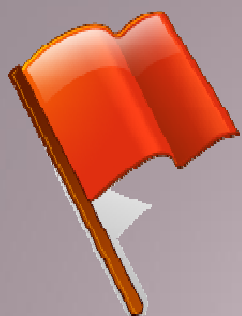


## WHY MUST SAINT ANTHONY COMPLY WITH THESE RULES?

The rules apply to:

- A business or organization that permits customers (including patients) to pay for products or services in multiple installments over time.
  - This definition includes most healthcare providers that permit deferred payments for services, even if only occasionally





## SAINT ANTHONY'S PROGRAM MUST: IDENTIFY RED FLAGS

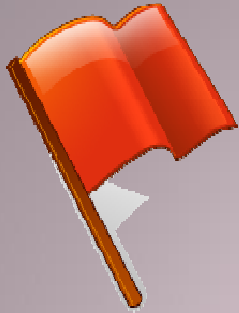
- This is accomplished by being aware of these warning signs:
  - Alerts, notifications, or other warnings received from consumer reporting agencies or service providers,
    - Fraud alert on credit report
  - The presentation of suspicious documents
    - Picture on I.D. does not match person in front of you
    - Identification that looks altered or forged
  - The presentation of suspicious personal identifying information, such as:
    - Social security number is being used by someone else's account
    - Person omits required information and doesn't respond to notices about information being incomplete
  - The unusual use of, or other suspicious activity related to an account, such as:
    - Information that the customer isn't receiving their account statements in the mail
  - Notice from customers, victims of identity theft, law enforcement authorities, or other persons regarding possible identity theft in connection with covered accounts held by the institution or creditor.



## OTHER EXAMPLES OF “RED FLAGS”

- A patient or insurance company report that coverage for legitimate hospital stays is denied because insurance benefits have been depleted or a lifetime cap has been reached.
- A complaint or question from a patient about the receipt of a collection notice from a bill collector.
- A complaint or question from a patient about information added to a credit report by a health care provider or insurer.
- A dispute of a bill by a patient who claims to be the victim of any type of identity theft.
- A patient who has an insurance number but never produces an insurance card or other physical documentation of insurance.
- A notice or inquiry from an insurance fraud investigator for a private insurance company or a law enforcement agency.





## OTHER EXAMPLES OF “RED FLAGS”

A complaint or question from a patient based on the patient’s receiving:

- a bill for another individual
- a bill for a product or service that the patient denies receiving
- a bill from a health care provider that the patient never patronized or
- a notice of insurance benefits (or Explanation of Benefits ) for health services never received.
- Records showing medical treatment that is inconsistent with a physical examination or with a medical history as reported by the patient.



## SAINT ANTHONY'S PROGRAM MUST: DETECT RED FLAGS

Request of photo ID is the best practice method to thwart potential identify thefts.

Proper identification of the patient must occur at the point of registration.

Patient registrars will request a photo ID and insurance cards for all registrations performed.

Patient registrars will ask open ended questions to verify that the individual registering has relevant information to confirm their identity.

Ask open ended questions or statements such as:

Please verify your home address.

What is your home phone number?

Do you have any health insurance you would like us to bill?

Please verify the last 4 digits of your social security number.



## SAINT ANTHONY'S PROGRAM MUST: DETECT RED FLAGS

- ◉ Compare the photo ID of the person presenting for treatment.
- ◉ If the photo ID differs from the previously scanned image, scan in the updated version.
- ◉ If you believe the ID presented does not match the person being registered; excuse yourself from the patient and contact the appropriate manager or designee.
- ◉ The Registrar will document any reason for discrepancy from the previously asked questions or statements in the PA notes section of Affinity.



## SAINT ANTHONY'S PROGRAM MUST: DETECT RED FLAGS

- Registration Manager Responsibilities
  - Assess the situation by making an identity determination from the picture ID.
  - Approach the patient if you determine the picture ID does not match the person registering.
  - If you are unable to validate or question the person's identity contact St. Anthony Medical Center Hospital Security.



## SAINT ANTHONY'S PROGRAM MUST: RESPOND TO RED FLAGS

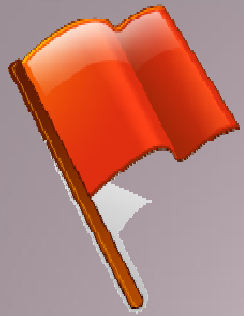
1. Complete an Incident Report for the alleged identity theft issue.
2. If the alleged complainant is on site notify the following department immediately:
  - Risk Management\Privacy Officer
  - Health Information Management (HIM),
  - Patient Access and Security
3. Risk Management, Patient Access, HIM, and Security will conduct an investigation, and correct medical and billing information.
4. Security may contact local law enforcement to file a police report.
5. All account billing and statements will be put on hold until resolution of the account has taken place.
6. All medical records will be unavailable for release until the investigation is complete.



## SAINT ANTHONY'S PROGRAM MUST: RESPOND TO RED FLAGS

1. If the patient is calling or reporting identity theft issues after services have been provided, inform the victim that SSFHS considers this a serious matter and will conduct a thorough investigation and take the appropriate action. Then immediately contact HIM and Patient Access departments.
2. The staff person receiving the complaint by alleged Medical Identify Theft victim complete an Incident Report.
3. HIM or Patient Access will speak with the alleged Medical Identify Theft victim and if appropriate will instruct the individual to file a report with their local Police Department.
4. The Police Report will be attached to the Incident Report by the investigating manager or supervisor
5. If the individual reporting the identity issue does not wish to have a police report filed, the complainant may complete an affidavit and it will then be attached to the Incident Report.
6. All unresolved payments and billing statements will be resolved.
7. All medical records will be unavailable for release until the investigation is complete.





## SAINT ANTHONY'S PROGRAM MUST: KEEP OUR PROGRAM UPDATED

- We must keep up with risks to customers based on factors such as:
  - Our experiences with identity theft;
  - Changes in methods of identity theft;
  - Changes in methods to detect, prevent, and mitigate identity theft;
  - Changes in the types of accounts that we maintain, and
  - Changes in the business arrangements of the financial institution or creditor, including mergers, acquisitions, alliances, joint ventures, and service provider arrangements.

# PROCEDURE FOR REGISTERING OR TREATING DEPARTMENT:

1. At the time of each registration the following identifiers will be checked visually with a picture ID:
  - Name of Patient
  - Date of Birth
  - Current Address
2. For patients who are pre-registered and/or patients who report directly to the treating department, the treating department will be responsible for this ID check.
3. In the event a picture ID is not available two (2) other forms of identification can be utilized to determine identity.
4. The following identifiers will be checked verbally against the forms of identification:
  - Name of Patient
  - Date of Birth
  - Current Address
  - Social Security Number
5. The identification process for patients judged not competent will include a picture ID or 2 other forms of identification obtained from closest relative present or individual presenting with registration information.

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