

Course: T 2452 (Webinar)
FTC “Red Flags Rules”:
Are You Prepared for the November 1, 2008 Deadline for the Hospital Identity Theft Program?
Strategies for Compliance

This webinar will provide guidance and templates necessary to comply with the “Red Flags Rules”. Upon registration for this TELNET, the handouts and templates will be available by October 15, 2008.

Background: The Federal Trade Commission, the Federal Reserve and other financial regulatory agencies are phasing in new rules for institutions, such as banks, credit unions, and hospitals that govern their detection of, response to, and prevention of identity theft. By November 1, 2008, hospitals must have an identity theft prevention program that has been approved by its board of directors or an appropriate committee of the board. Overall, the “Red Flags Rules” are designed to detect, prevent and mitigate identity theft, in particular with regard to the patient accounts that the hospital maintains. In general, this program is designed to detect “Red Flags” defined as a “pattern, practice, or specific activity that indicates the possible existence of identity theft.” The program must be updated periodically. Risk assessment of the covered patient accounts must be conducted with particular consideration of how those accounts are opened, accessed and any previous experience that the institution has had with identity theft. The approved plan must contain certain elements and provide for continued administration by either the board, a committee of the board or a designated employee in senior management to oversee, develop, implement and administer the Program. Notably, the “Red Flags Rules” can include existing policies and procedures to prevent patient identity theft.

In preparing this program, the presenter drafted template documents for hospitals to consider in designing their identity theft program. The program must be tailored to the hospital's specific risk, based on historical experience with identity theft. Since each hospital should have its own policies, the information is offered as guidance for illustrative purposes only. The templates to be provided focus on possible “Red Flags” associated solely with patient accounts, although it is possible that a hospital has other financial accounts that could be used for improper purposes of identity theft.

Target Audience: CEO, COO, CFO, CNO, CMO, Board Members, Compliance Officer, Privacy and Security Officer, Patient Financial Services, Hospital Leadership, and Hospital Legal Counsel

Date: November 11, 2008

Time: 1-3 pm EST

Faculty:

Tracy Field
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Arnall, Golden, Gregory LLP
Atlanta, Georgia

Tracy Field is an attorney in the Healthcare and Life Sciences Practice Groups at Arnall, Golden, and Gregory. She counsels healthcare providers regarding HIPAA and other federal laws affecting their operations. Also, she assists providers and life sciences companies with FDA and reimbursement issues. Ms. Field has presented and published on healthcare legal topics. In 1993, she received her J.D. from Emory University School of Law.

Program Topics: *(Templates for the required policies and procedures will be provided.)*

- “Red Flags Rules” - what is and what is not required by November 1, 2008
- Board resolution approving program and providing administrative oversight
- Overview of the identity theft program
- Required training, reporting, and administrative requirements under the rules (Sample training and reporting forms will be included. Also, because the regulations contemplate that oversight of this program extend to service provider contracts, sample boilerplate language that could be used in certain contracts associated with maintaining the patient accounts will be provided.)
- Identification, detection and response to “Red Flags”
- Suspicious activities of medical identity theft

CE Credit: .1 (GHA)

Registration: For TELNET member hospitals, there is a site fee of **\$155** for this course. For non-TELNET member hospitals, the registration fee is **\$195** per site. Advance registration is required to ensure delivery of instructional materials. Please register by calling Rochelle Rodocker at 770.249.4526 or e-mailing her at rrodocker@gha.org by **October 28, 2008**.

