

What do to about the Red Flags Rule

The Federal Trade Commission (FTC) established the Red Flags Rule in January 2008; however, enforcement of the rule was delayed until May 1, 2009. The rule is designed to help alleviate identity theft - or as the FTC says, "to reduce the overall incidence and impact of identity theft, including medical identity theft."

DOWNLOAD the FTC's Guide to Fighting Fraud with the Red Flags Rule (see CCA Member Page)

ALL health care providers, include chiropractic clinics, should always be aware of possible fraud and identity theft for their patients and their businesses and work to protect health care records and patient information. The HIPAA regulations that you now comply with are a great start.

The Red Flags Rule applies to CREDITORS - which means businesses that defer payments of debts or accept deferred payments for the purchase of services. If your clinic bills patients AFTER services are provided OR accepts insurance in lieu of payment for your services, then you would be defined as a CREDITOR and subject to the rule. Just taking credit cards for payment does not qualify you as a CREDITOR.

You should develop a written program that identifies and deals with potential identity theft "red flags" that may occur in your clinic. The FTC has made complying with this rule fairly flexible so that you can design a program that fits your clinic's needs.

Here are the basic steps to developing a Red Flags Rule Program:

1. Identify potential red flags
2. Detect red flags
3. Prevent and Mitigate Identity theft
4. Update your program periodically

Download DETAILED guide see pages 63773-63774 for program development (see CCA member page)

Make sure that you and your staff are aware of warning signs, take steps to spot them, address potential problems, and update your procedures periodically based on your clinic's experience.

For questions on how health care providers can be compliant with this rule, email redflags@ftc.gov

ON-LINE Seminar option - see next page

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CCA Colorado Chiropractic Association
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303.755.9011 or 800.829.0339

ON-LINE Seminar Available for Red Flags Rule Training

The Congress of Chiropractic State Associations (COCSA) Chiropractic Association now have a RED FLAG course to offer the Chiropractic Profession.

As of today, there is a website www.COCSA.myicourse.com where you can enroll in the course.

COCSA has negotiated a discount for the course for Members of the Colorado Chiropractic Association and the password is "RED." By using the above password in the DISCOUNT section, the price of the course will go from \$299 to \$99.

The course takes about 45 minutes to complete.

The directions for the website tutorial are listed below and there is also a video you can click on for step by step instructions. The site is live and the RED FLAG Course has already been pre-viewed by about 50 chiropractors and the feedback has been VERY positive. This Course provides an overview of the Red Flags Rule, what to do about it and tools for implementation in your clinic.

Remember the current deadline for the Compliance of the Red Flag rule is May 1, 2009. Taking the COCSA sponsored Red Flag course can be done in six easy steps

#1 Go to www.COCSA.myicourse.com

#2 Your discount code is "RED" - you will receive a 67% reduction and obtain the course for only \$99 as a CCA member.

#3 Let's get registered! Click the "New User" link located in the upper right hand corner. Enter your e-mail address, make-up a password and complete the basic registration information. You will know that you are registered when you see your e-mail address in the upper right corner of the screen.

#4 Let's pick the course. Click "Course Catalog" on the left side of the page and you will see the course listed at the non-member price of \$299. Insert the discount code below the course and click "Apply Discount Code." The fee will change to \$99.

#5 Now check the small "Enroll" box to the right of the course and then click the yellow "Enroll Now" button.

#6 Fill in your credit card information on our encrypted and secure page. Click the "Purchase Course" button and the course will start.

The course takes about 45 minutes to complete.

Click the FAQ button on the left side of the page if you log out early or need to resume the course.

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