Dermatology Associates 18425 West Creek Dr Ste F Tinley Park, IL 60477

## RED FLAG RULES – IDENTITY THEFT PREVENTION PLAN

It is the policy of Dermatology Associates to follow all federal and state laws and reporting requirements regarding identity theft. Specifically, this policy outlines how Dermatology Associates will identify, detect, and respond to "red flags." A red flag as defined by this policy includes a pattern, practice, or specific account or recorded activity that indicates possible identity theft.

This is in compliance with Part 681 of title 16 of the Code of Federal Regulations implementing Sections 114 and 315 of the Fair and Accurate Credit Transactions Act (FACTA) of 2003. Failure to comply with these regulations could mean administrative penalties of up to \$2500 in fines per violation.

## **Definitions:**

Identity theft – Fraud committed or attempted, using information regarding the identity of a person or persons, other than the person presenting for treatment or insurance coverage. This may occur by presenting state identification, insurance cards, credit cards or other forms of personal identification to imply that the presenter is the owner or bearer of said information.

Covered account – any institution that receives financial payment through electronic credit card processing or the use of checks issued by a financial institution

Red flag -A pattern, practice, or activity by which the possible existence of an act or attempt of identity theft may be detected, deterred and/or prevented.

## Plan:

Dermatology Associates establishes a plan to implement an identity theft prevention program to detect, prevent, and minimize the impact of identity theft.

Dermatology Associates has established a plan that is pursuant to the existing HIPAA Security rule, and that insures appropriate physical, administrative, and technical safeguards to protect health information and sensitive information related to patient identity from any intentional or unintentional use of disclosure.

The plan includes polices and procedures that will define and facilitate relevant red flags. It will detect red flags that are identified in this plan.

The plan will provide procedures to insure appropriate response to the established red flags are implemented.

The plan will be updated periodically to allow for any changes required to continue minimizing the risk of identity theft to our customers/patients.