

BestCare Ambulance Services, Inc.

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IDENTITY THEFT PREVENTION, DETECTION AND MITIGATION PROGRAM

Training for Billing Office Personnel

Purpose and Overview.

The purpose of this Policy/Procedure (“Policy”) is to assure that BestCare Ambulance Services, Inc. maintains compliance with the requirements regarding the prevention, detection and mitigation of Identity Theft as set forth in the federal regulations known as the “Red Flag Rules.”¹

“Identity Theft” means a fraud committed or attempted using the identifying information of another person without authority.

This includes “Medical Identity Theft,” i.e., Identity Theft committed for the purpose of obtaining medical services, such as the use of another person’s insurance card or number. Although Medical Identity Theft may occur without the knowledge of the individual whose medical identity is stolen, in some cases the use of an individual’s medical identity may occur with the knowledge and complicity of that individual.

Identification of Red Flags

A “Red Flag” is a pattern, practice or specific activity that indicates the possible existence of Identity Theft. In other words, a Red Flag is a warning sign regarding the possibility of Identity Theft.

BestCare Ambulance Services, Inc. has identified the following situations as Red Flags that should alert BestCare Ambulance Services, Inc. personnel to the possibility of Identity Theft:

I. Identification of Red Flags

- A. A “Red Flag” is a pattern, practice or specific activity that indicates the possible existence of Identity Theft. In other words, a Red Flag is a warning sign regarding the possibility of Identity Theft.

1. A patient submits a driver's license, insurance card or other identifying information that appears to be altered or forged;
2. The photograph on a driver's license or other government-issued photo I.D. submitted by a patient does not resemble the patient;
3. Information on one form of identification submitted by a patient is inconsistent with information on another form of identification, or with information already in BestCare Ambulance Services, Inc.'s records or information obtained from other sources such as a consumer credit data base;
4. A patient has an insurance member number but no insurance card;
5. The Social Security Number ("SSN") or other identifying information furnished by a patient is the same as identifying information in BestCare Ambulance Services, Inc.'s records furnished by another patient;
6. The SSN furnished by a patient has not been issued, is listed on the Social Security's Administration's Death Master file, or is otherwise invalid. The following numbers are always invalid:
 - a. the first 3 digits are in the 800, 900 or 000 range, or in the 700 range above 772, or are 666;
 - b. the fourth and fifth digits are 00; or
 - c. the last four digits are 0000;
7. The address given by a patient does not exist or is a post office box, or is the same address given by an unusually large number of other patients;
8. The phone number given by the patient is invalid or is associated with a pager or an answering service, or is the same telephone number submitted by an unusually large number of other patients;
9. The patient refuses to provide identifying information or documents;
10. Personal identifying information given by a patient is not consistent with personal identifying information in BestCare Ambulance Services, Inc.'s records, or with information provided by another source such as an insurance company or consumer credit database;
11. A patient's signature does not match the signature on file in BestCare Ambulance Services, Inc.'s records;
12. A patient contacts BestCare Ambulance Services, Inc. [*or BestCare Ambulance Services, Inc.'s billing service*] and indicates that he or she has received an invoice, explanation of benefits or other document reflecting a transport that the patient claims was never received;

13. Mail correspondence is returned to BestCare Ambulance Services, Inc. despite continued activity associated with that mailing address;
 14. BestCare Ambulance Services, Inc. receives a warning, alert or notification from a credit reporting agency, law enforcement or other credible source regarding a patient or a patient's insurance information;
 15. BestCare Ambulance Services, Inc. or a Service BestCare Ambulance Services, Inc. has suffered a security breach, loss of unprotected data or unauthorized access to patient information;
 16. An insurer denies coverage due to a lifetime benefit limit being reached or due to an excessive volume of services;
 17. A discrepancy exists between medical or demographic information obtained by BestCare Ambulance Services, Inc. from the patient and the information found in health facility records;
 18. Attempts to access an account by persons who cannot provide authenticating information;
- B. All BestCare Ambulance Services, Inc. personnel have an affirmative obligation to be vigilant for any evidence of a Red Flag and to notify their immediate supervisor, or the Program Compliance Officer, to report the Red Flag.

II. Procedures for Billing Office personnel for Identifying Red Flags

BestCare Ambulance Services, Inc. personnel will follow the following procedures in order to detect the Red Flags indicated above, which indicate the possibility of Identity Theft.

- A. Billing personnel, in the course of creating and processing claims, and verifying patient information, shall be alert for the existence of any of the Red Flags listed above.
- B. Before providing information regarding an account, or making any change to an address or other information associated with an account, the requester shall be required to provide the social security number, full name, date of birth and address of the patient. If the requester makes the request in person, a driver's license or other government issued photographic identification shall be requested.
- C. In the event medical transport personnel or billing personnel encounter a Red Flag, the existence of the Red Flag shall be brought to the prompt attention of the individual's supervisor or the Program Compliance Officer so that it can be investigated and addressed, as appropriate, in accordance with the procedures set forth in Section V below.

III. Responding to Red Flags

- A. When a Red Flag is detected, BestCare Ambulance Services, Inc. personnel shall investigate the situation, as necessary, to determine whether there is a material risk that Identity Theft has occurred or whether there is a benign explanation for

the Red Flag. The investigation shall be documented in accordance with BestCare Ambulance Services, Inc.'s incident reporting policy for red flag issues. If it appears that Identity Theft has not occurred, BestCare Ambulance Services, Inc. may determine that no further action is necessary.

- B. BestCare Ambulance Services, Inc.'s response shall be commensurate with the degree of risk posed by the Red Flag. In determining an appropriate response, BestCare Ambulance Services, Inc. shall consider aggravating factors that may heighten the risk of Identity Theft, such as a data security incident that results in unauthorized access to a patient's account records, or notice that a patient has provided information related to a BestCare Ambulance Services, Inc. account to someone fraudulently claiming to represent BestCare Ambulance Services, Inc. or to a fraudulent website.
- C. If it appears that Identity Theft has occurred, the following steps should be considered and taken, as appropriate:
 - 1. Except in cases where there appears to be obvious complicity by the individual whose identity was used, promptly notify the victim of Identity Theft, by certified mail, using the Identity Theft Patient Notice Letter developed by BestCare Ambulance Services, Inc.. Notification may also be provided by telephone, to be followed by a mailed letter;
 - 2. Place an Identity Theft Alert on all patient care reports ("PCRs") and financial accounts that may have inaccurate information as a result of the Identity Theft;
 - 3. Discontinue billing on the account and/or close the account;
 - 4. Reopen the account with appropriate modifications, including a new account number;
 - 5. If a claim has been submitted to an insurance carrier or government program ("Payor") in the name of the patient whose identity has been stolen, notify the Payor, withdraw the claim and refund any charges previously collected from the Payor and/or the patient;
 - 6. If the account has been referred to collection agencies or attorneys, instruct the collection agency or attorneys to cease collection activity;
 - 7. Notify law enforcement and cooperate in any investigation by law enforcement;
 - 8. Request that law enforcement notify any health facility to which the patient using the false identity has been transported regarding the Identity Theft;
 - 9. If an adverse report has been made to a consumer credit reporting agency regarding a patient whose identity has been stolen, notify the agency that the account was not the responsibility of the individual;

10. Correct the medical record of any patient of BestCare Ambulance Services, Inc. whose identity was stolen, with the assistance of the patient as needed;
11. If the circumstances indicate that there is no action that would prevent or mitigate the Identity Theft, no action need be taken.

IV. Investigation of Report by a Patient of Identity Theft

- A. If an individual claims to have been a victim of Identity Theft (e.g., the individual claims to have received a bill for a transport he did not receive), BestCare Ambulance Services, Inc. shall investigate the claim. Authentication of the claim shall require a copy of a Police Report and either:
 1. The Identity Theft affidavit developed by the FTC, including supporting documentation; or
 2. An identification theft affidavit recognized under state law
- B. BestCare Ambulance Services, Inc. personnel shall review the foregoing documentation and any other information provided by the individual and shall make a determination as to whether the report of Identity Theft is credible.
- C. The individual who filed the report shall be informed in writing of BestCare Ambulance Services, Inc.'s conclusion as to whether BestCare Ambulance Services, Inc. finds the report credible.
- D. If, following investigation, it appears that the individual has been a victim of Identity Theft, BestCare Ambulance Services, Inc. will take the appropriate actions as indicated in Section V of this Policy.
- E. If, following investigation, it appears the report of Identity Theft was not credible, the individual shall be notified and BestCare Ambulance Services, Inc. may continue billing on the account, upon approval of the Program Compliance Officer. The account shall not be billed without such approval.