

IDENTITY VERIFICATION FORM

As a part of receiving services at Shepherd's Staff Christian Counseling Center it is now necessary to go through an identity verification process. You will be required to provide some form of identification as detailed on the second page of this document at the time of your first session. What follows is the explanation of why this is necessary.

As of 5/1/2009 the Federal Trade Commission began enforcing compliance with its new "Red Flag Rules," regulations intended to reduce identity theft. These rules were designed primarily for financial institutions and other major creditors, such as auto dealers. However, the federal agency has indicated that it broadly interpreted the definition of who is considered a "creditor" subject to the rules. That broad interpretation would include health care providers who regularly let clients defer payment for services. In our setting payment may be deferred as we wait to receive payment from third party payors (insurance, government programs, churches, etc.) or when the client cannot pay in full and elects to pay so much per session, per week, or per month towards their bill. Therefore, we are considered a "creditor" as defined by the Federal Trade Commission.

As a result of being considered a "creditor" Shepherds Staff Christian Counseling Center is required to actively monitor for and protect against identity theft by developing and implementing a written identity theft prevention program. This includes identifying potential red flags (warning signs), detecting them, responding to any that are detected, and periodically assessing and updating our written identity theft prevention program.

One element of this identity theft prevention program is the establishment of thorough client identity verification processes that include some kind of photo identification. For this reason our Center has developed the Identity Verification Form and a procedure for completing this form. We appreciate your compliance with this procedure as we attempt to protect your medical identity.

The World Privacy Organization defines medical identity theft as "theft that occurs when someone uses a person's name and sometimes other parts of their identity – such as insurance information or social security number – without the victim's knowledge or consent to obtain medical services or goods, or when someone uses the person's identity to obtain money by falsifying claims for medical services and falsifying medical records to support those claims." Angela K. Dinh, in an article entitled, "Security Precautions against Medical Identity Theft," states the following: "Medical identity theft, unlike financial (credit card) identity theft, can have a much more profound effect on its victim. An individual's lifetime insurance maximum can be spent and medical information altered, causing a domino effect resulting in denials for future insurance and treatment, or even worse, improper treatment from incorrect information." The results of wrong information in the record can lead to false diagnoses and unsafe or deadly care.

As healthcare professionals, we must protect you, our consumers, by doing what we can to prevent identity theft, particularly medical identity theft, and the potential damages to your identity, medical record, and healthcare benefits.

You may find additional information on the "Red Flag Rules", Identity Theft, and Medical Identity Theft at the following websites:

www.worldprivacyforum.org (various articles)

www.ahima.org (AHIMA Practice Brief: Mitigating Medical Identity Theft)

www.ftc.gov (Red Flag Rules)

www.MyPHR.com (various articles)

Documents that may be used to verify identity. *Must be unexpired and have a photo.*

- U.S. Passport or U.S. Passport Card
- Permanent Resident Card
- Visa
- Employment Authorization Card
- Driver's License Issued by a State or outlying possession of the U.S.
- ID card issued by federal, state, or local government agencies/entities
- School ID with a photograph
- U.S. Military ID card
- Military dependent's ID card
- U.S. Coast Guard Merchant Mariner Card
- Native American tribal document
- Driver's license issued by a Canadian government authority

If the card/ID contains a photo but no current address, we must also have a non photo ID card, utility bill, rent/lease agreement or other evidence of current address.

Third party payors:

A copy of client insurance card, current Medicaid ID card, Medicare card, Military ID card (Tricare), etc. must also be supplied.