

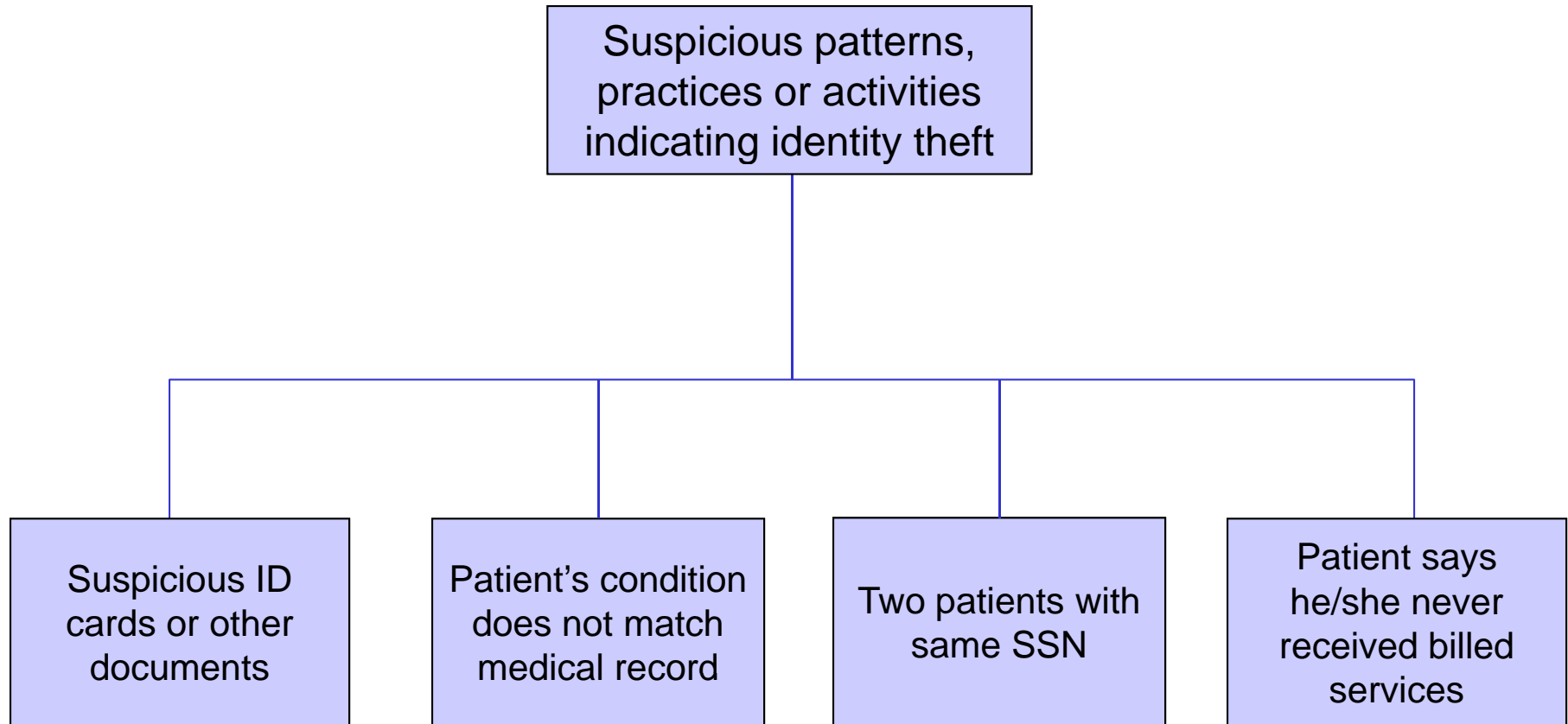
Scope of FTC Red Flags Rule

- Applies to “financial institutions” and “creditors.”
- You are a creditor if you “extend, renew or continue credit.”
- You extend credit if you accept deferred payments for the purchase of property or services.

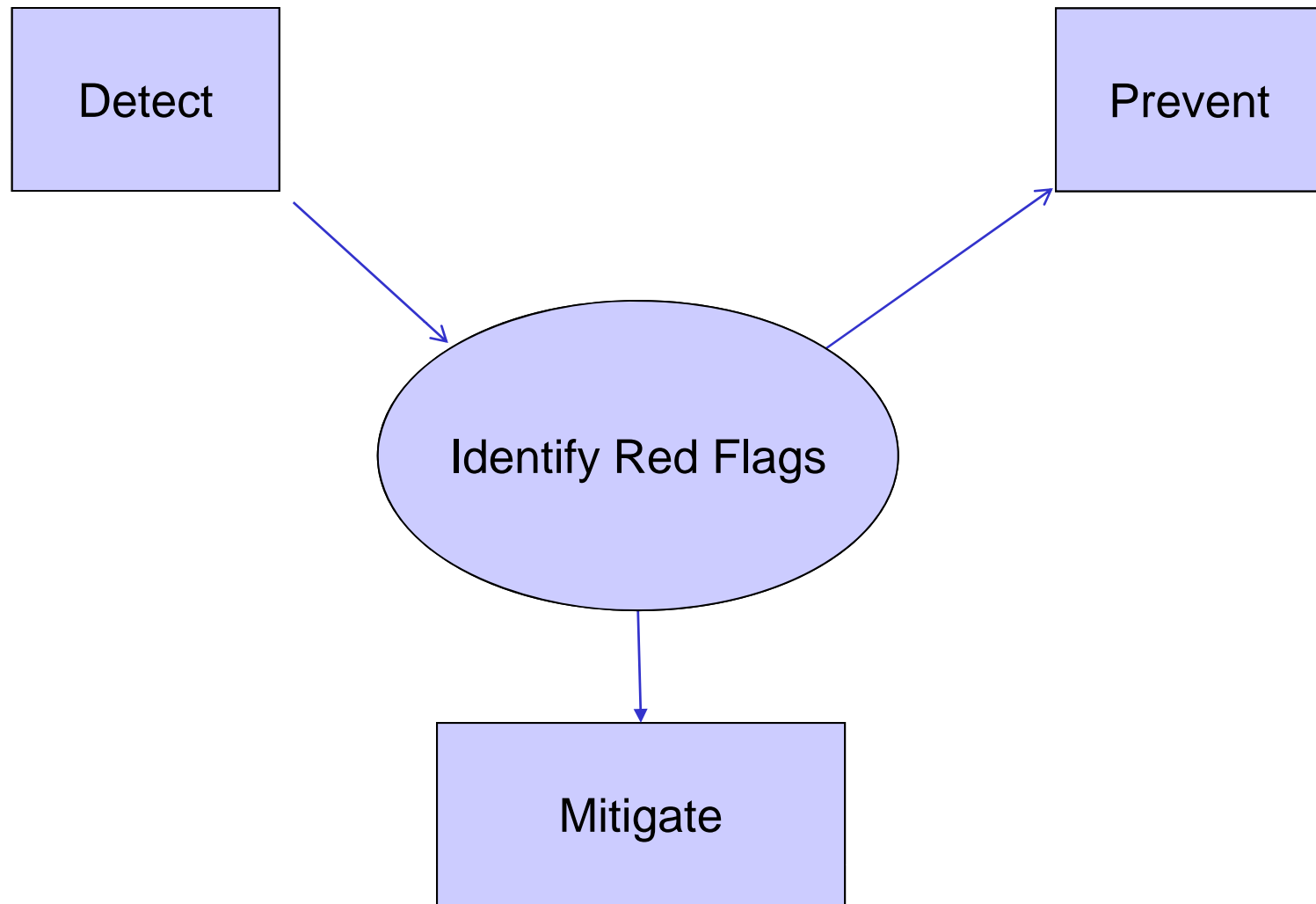
How Can Health Care Providers Extend Credit?

- Permit uninsured patients to pay after date of service.
- Permit insured patients to make co-pays after date of service.
- Collect spend-down payments from patients after date of service.
- Hold patients responsible for claims denied by public or private insurance.

What are “Red Flags”?



Elements of Red Flags Program



Compliance Implementation Steps

- Risk assessment
- Development of policies and procedures (integrate with HIPAA compliance program)
- Employee training
- Delayed effective date: August 1, 2009