

RED FLAGS RULE ALERT

Last fall the ICS notified its members that the Federal Trade Commission (FTC) had adopted rules requiring creditors to implement identity theft programs by August 1, 2009. Despite objection by numerous groups, **the FTC has now ruled that physicians who are “creditors” must comply with the rule.** The rule got its name from the requirement that creditors must identify and prevent suspicious activity, or “red flags,” that signal the possibility of identity theft.

A physician is a “creditor” and subject to the rule if he or she is a person who regularly extends credit for personal services involving multiple payments. **This means that many physicians will need to implement an identity theft prevention program by August 1, 2009.** Although August 1, 2009, is the enforcement date, the ICS believes the FTC strongly encourages voluntary compliance by all covered creditors.

As always, the ICS will keep its members informed as to any important developments regarding these rules.

To assist our members, the following resources are available:

Federal Trade Commission Information

The “Red Flags” Rule: What Health Care Providers Need to Know About Complying with New Requirements for Fighting Identity Theft,
<http://www.ftc.gov/bcp/edu/pubs/articles/art11.shtm>

This is a good summary of the purpose, applicability and requirements of the rules, with links to other resources, including Guidelines issued with the Red Flags Rule.

RedFlags@ftc.gov -- Send an e-mail to the FTC with questions.

American Chiropractic Association

Red Flag Rules Apply to Doctors of Chiropractic,
<http://www.acatoday.org/pdf/RedFlagRules2009.pdf>

COCSA Online Program for FTC Red Flags Rules -- As a benefit of the Illinois Chiropractic Society’s membership in the Congress of State Chiropractic Associations (COCSA), COCSA is offering a specific Chiropractic Online Program **to ICS members at a discounted price of \$99.00** (compared to \$299.00 for non-ICS members) for a chiropractic physician or his or her staff member. Log on to www.COCSA.mycourse.com for information about the Red Flag Rules and the COCSA sponsored online class. The web site contains video instructions for registration and COCSA has also provided the following written instructions for registering and taking the COCSA sponsored course:

First, contact the ICS for a members' only discount code so that you will receive a 67% reduction and obtain the course for only \$99.

With your discount code in hand, go to the COCSA site at www.COCSA.myicourse.com.

To register: 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.

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.

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

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

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