

SAMPLE POLICY

Policy # 101

Date: 04/01/2009

Policy Title: Developing an Identity Theft Prevention Program

Policy:

This organization has committed to developing and implementing an identity theft prevention program that encompasses the elements included in the FTC guidance.

Procedure:

A. To develop and implement an identity theft prevention program in this organization, we will create a committee responsible for the development and oversight of the program.

B. This committee will be comprised of representation from:

- (i) Compliance
- (ii) Billing
- (iii) Registration
- (iv) Medical Records

C. The committee will be responsible for utilizing the guidance provided by the FTC to develop individual policies addressing:

- (i) Identification of relevant "red flag" patterns and practices
- (ii) How to prevent and mitigate identity theft
- (iii) Methods for keeping the program updated
- (iv) Processes for administering and oversight of the program

D. The committee will periodically review this policy and make necessary modifications and updates.

Approved by: _____

Date: _____

Title: _____

Resources:

Federal Register

FTC Interagency Guidelines on Identity Theft Detection, Prevention & Mitigation