

Identity Theft Prevention Program

Effective May 1, 2009

Because JRWC (known as Jackson Regional Women's Center, offers and maintains "covered accounts", as defined by 16 C.F.R. Part 681 (the "Regulations"), JRWC is required to develop and implement a written Identity Theft Prevention Program (the "Program"). The Program serves to protect, detect, and mitigate identity theft in connection with the opening of covered accounts and maintenance of existing covered accounts.

I. Definitions

As used herein, the specified terms shall be defined as follows:

- A. "Covered account" means an account receivable generated by JRWC for payments of goods or services subsequent to the delivery of such goods or services to the patient (even if payment is expected to be made by third-party payer) and all paper and electronic records relating to or reflecting that receivable, but not including the underlying medical records.
- B. "Identifying Information" is any name or number that may be used, alone, or in conjunction with any other information, to identify a specific person, including:
 - 1) Name, date of birth, address, telephone number, e-mail address
 - 2) Social Security or employer taxpayer identification number
 - 3) Health, disability or other insurance plan identification number
 - 4) Government-issued driver's license or identification number, alien registration number, government passport number
 - 5) Checking and savings account and debit and credit card numbers or any other numbers or information that may be used to access a person's financial information or resources(e.g., PINs, passwords,etc)
 - 6) Biometric data (e.g., fingerprints, etc)
- C. "Identity theft" means using or transferring without legal authority another person's means of identification with the intent to commit (or to aid and abet) any unlawful activity that constitutes a violation of law.
- D. "Medical identity theft" occurs when someone assumes or attempts to assume the identity of another person through fraudulent means or false pretenses to obtain or attempt to obtain medical services or goods, or to make false claims for medical services or goods.
- E. "Patient" refers to an individual for whom JRWC provides medical goods or services, as well as the personal representative of such individual and any person responsible for payment for goods and services provided to the individual.
- F. "Red flags" refer to those patterns, practices, and specific activities with respect to covered accounts which may signal identity theft.

II. Oversight

The Administrator shall be responsible for the implement and operation of the Program with the full support and cooperation of the Executive team and department managers. The Administrator shall be responsible for the maintenance of appropriate documentation of JRWC's identity theft prevention activities.

The Administrator shall regularly communicate with employees directly involved in the Program's operations and provide at least annual reports to the Board of Directors concerning those operations. The Administrator shall continuously review and evaluate the Program's effectiveness in achieving its stated goals and make appropriate revisions or enhancements to the Program based on the following considerations:

- A. JRWC's experiences with identity theft
- B. Changes in prevalent methods of identity theft
- C. Advancements in strategies and technological solutions to detect, prevent, and mitigate identity theft
- D. Changes in types of accounts that JRWC offers or maintains
- E. Changes in JRWC's business arrangements including merger, acquisitions, alliances, joint ventures, and service provider arrangements
- F. Changes in or clarifications of legal requirements