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Identity Theft Policy July 2009

Purpose: The purpose of this policy is to describe the characteristics of identity theft and emphasize the expectations to detect, prevent and mitigate the effects of identity theft in order to protect clients and help ensure safe and sound operations, as well as protect the insurance companies from fraudulent claims.

The majority of identity theft is committed using hard-copy identification or other documents. Identifying information may include a stolen social security number, health insurance policy numbers, date of birth, or name. The following policies are security measures intended to protect clients and companies who reimburse them for services:

1. All clients will be asked to provide a current government-issued photo identification to verify the client's identity. It will not be photocopied, but visually examined.
2. Protected Health Information is not provided to anyone unless the parent/guardian gives written consent on the Patient History form or Exchange of Information form.
3. Parents give written consent for credit card charges for services.
4. Credit card numbers for cards on file are secured in a password protected computer document. The computer is also password-protected. When patients are discharged, credit card numbers are removed from the document .
5. ACH account (electronic bank transfers) information is stored in a secure-online program through our bank. Original copies of ACH agreements are stored in a locked file.
6. Medical Records no longer in use are stored in a locked location and not accessible to the general public.
7. Medical records are shredded after five (5) years using a destruction service. A certificate of destruction is maintained on file along with the names of the medical records that were shredded.
8. Administrative Staff are provided passwords for access to the computer, which is changed upon termination.
9. Telephone notes and copies of any reports that are to be discarded (such as one that has been jammed in a printer) containing patient names, telephone numbers and clinical information are shredded after use.
10. Staff is provided with identify theft education during orientation.
11. Clients will be provided with a copy of this policy and it will be posted on the company's website.