

Fingerprinting

Are your fingerprints on file with the California Department of Justice?

Per the CA Association of Marriage and Family Therapists, clinicians renewing their licenses after October 1, 2009 should be fingerprinted. While this requirement will not stop the license process, a clinician can be cited or fined if it is determined they have not submitted fingerprints. The following link provides resources for fingerprinting.

<http://www.ag.ca.gov/fingerprints/>

Identity Theft Protection

Do you have a written identity theft protection policy?

Effective November 1, 2009, all "creditors" must have a written policy and procedure for Identity Theft protection. The policy must outline how providers will identify, detect, and respond to "red flags".

Creditors: "any person or organization that regularly defers payments for goods and services or provides goods and services and bills customers later."

Red flags:

- Alerts, notifications, or warnings from a consumer reporting agency
- Suspicious documents
- Suspicious personal identifying information
- Suspicious activity relating to a covered account
- Notices from customers, victims of identity theft, law enforcement authorities, or other entities about possible identity theft

If your practice includes acceptance of credit cards, this regulation may apply to you. You are encouraged to contact your professional association for further clarification. CHIPA has developed an Identity Theft Prevention Policy and Procedure, which may be modified for use in your practice. A copy is available at the following link: <http://www.comprehensivebehavioral.com/Providers/Newsletters.php>

Insurance Fraud

Are you committing insurance/claims fraud?

Protect your license. The following is a list of practices observed by CHIPA within the past year. Not only were these practices claims fraud, they were also not covered services and in some incidents, breach of contract with CHIPA.

- Billing an individual psychotherapy visit (90806) for attendance at an IEP meeting. *Note: IEP consultations are not covered under the benefit.*
- Billing a family psychotherapy session (90847) for a telephonic session. *Note: Telephonic sessions are not typically covered under the benefit. Provider must call for pre-authorization of this service.*
- Billing as the provider of service when the patient was seen by an intern. *Note: CHIPA contracts require patient to be seen by the licensed provider. Referrals to interns are not allowed.*
- Billing for a session that did not occur (e.g., no show).

If CHIPA determines that claims fraud has occurred, one or more of the following actions may be taken.

- Request for refund of all monies paid by CHIPA and/or member
- Random medical record audit for services provided within the past 12 months
- Termination of your CHIPA contract
- Notification to health plan credentialing departments
- Notification to licensing boards
- Suspension or revocation of license