

# BAY-ARENAC BEHAVIORAL HEALTH AUTHORITY POLICIES AND PROCEDURES MANUAL

<b>Chapter: 04</b>	<b>Care and Treatment Services</b>		
<b>Section: 10</b>	<b>Clinical Record</b>		
<b>Topic: 03</b>	<b>Confirming Identity and Minimizing the Collection of Non-Critical Identification Documents</b>		
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			_____ <i>Board Chairperson Signature</i>
		_____ <i>Chief Executive Officer Signature</i>	
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## **Policy**

It is the policy of Bay Arenac Behavioral Health Authority (BABHA) to confirm the identity of the people we serve and to minimize the collection of non-critical identification documents.

## **Purpose**

The purpose of this policy and procedure is to specify the method to confirm identity and identity documents that should not be collected.

## **Education Applies to:**

- All BABHA Staff
- Selected BABHA Staff, as follows: All Clinical, Clerical Support, Clinical Records, Financial Services, IS
- All Contracted Providers:  Policy Only  Policy and Procedure
- Selected Contracted Providers, as follows: Primary Care/Outpatient
- Policy Only  Policy and Procedure
- Other:

## **Definitions**

1. **Identifying Information:** Refers to a name, social security number, date of birth, government issued driver's license or identification number, alien registration number, government passport number, employer or taxpayer identification number, biometric data, unique electronic identifying number or telecommunication identifying information or access device.
2. **Incongruities/Inconsistencies:** Alterations or discrepancies in identification papers, cards, or financial documents.
3. **Permanent Identification:** Other proof of identity defined as acceptable by the Michigan Secretary of State as means to document legal presence, identity, residence and Social Security status for purposes of obtaining a Michigan Driver's License or Permanent Identification.

## **Procedure**

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1. Generally, BABHA’s identity of individuals receiving services will be confirmed as services are initiated and will continue as services are being provided.
2. In order to verify the identity of individuals referred to BABHA for services and within the context of BABHA, staff performing the initial appointment or face-to-face intake will verify an individual’s identity consistent with the following procedure:
  - a. Staff will check the individual’s driver's license, Michigan identification card, Social Security Card, birth certificate, or other form of permanent identification.
3. In general, staff will not scan identification cards into the clinical record nor retain copies of such cards, with the following exceptions:
  - a. Staff serving children and families may retain a copy of an individual’s birth certificate in order to assist the individual with linking and coordinating benefits or services;
  - b. Staff responsible for assessing ability to pay or affirming eligibility may retain a copy of an individual’s Medicaid eligibility verification for purposes of payment and coordination of benefits; and
  - c. If the individual requests that BABHA retain copies of key identification documents in order to assist him/her with linking and coordinating benefits and services. Such requests will be noted in the individual’s record by BABHA records staff.
  - d. If the individual does not have identification available, at least one of the following methods will be used as a means to reasonably assure his/her identity:
    - i. The individual was referred to us by another public or governmental entity, such as a State Center, another Community Mental Health Services Program, a public school, a Department of Public Health, or the Department of Human Services;
    - ii. The individual is accompanied by another person who can attest to the individual’s identity, such as a parent, other family member, or guardian;

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- iii. The individual can provide proof of residence, such as a bill or rental agreement containing his/her name and address; or
  - iv. The individual can provide court or county clerk documents proving guardianship, adoption, marriage, or other legal action.
- c. Identity verification will not be permitted to create barriers to necessary treatment, particularly emergency care for those who may have difficulty responding to identity verification requests. Staff dealing with such critical and emergent situations will ensure necessary treatment procedures are followed and identity is verified and documented as soon as possible.
4. BABHA staff gathering financial and/or identifying information from an individual will do so in an environment which protects that individual's privacy. Information provided by the individual will not be read aloud, left unattended, or otherwise be exposed to BABHA staff, other persons receiving services, or members of the public who do not have a need to know the information.
  5. Written financial and/or identifying information collected by BABHA staff will be returned to the individual if possible and not retained. If a financial or identification document must be retained, the document will be kept secure in a locked file cabinet or scanned and stored in a password protected electronic file. Expired documents or copies will be shredded in accordance with BABHA document destruction policies and procedures. Access will be limited to BABHA staff with a need to know the information in order to perform their job duties.
  6. When receiving financial or identification documents from an individual, BABHA staff will monitor for incongruities or inconsistencies in confirming his or her identity.
  7. Information or documents received from an individual that are perceived as questionable will be reviewed with supervisory staff prior to acceptance. If the individual is unable to provide satisfactory proof of identity or financial records, the issue will be referred to the primary care manager assigned to the individual for resolution regarding continuation of services.

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**Attachments**

N/A

**Related Forms**

N/A

**Related Materials**

N/A

**References/Legal Authority**

N/A

SUBMISSION FORM				
AUTHOR/ REVIEWER	APPROVING BODY/ COMMITTEE/ SUPERVISOR	APPROVAL/ REVIEW DATE	ACTION (Deletion, New, No Changes, Replacement or Revision)	REASON FOR ACTION If replacement, list policy to be replaced
Janis Pinter	Corporate Compliance Committee for Operations	04/22/10	New	
Marianne Bartlett	Corporate Compliance Committee for Operations	04/28/11	Revision	Revised based upon the reassessment of the risk for identity theft
Marlene Wolber	Janis Pinter	11/26/13	Revision	Minor changes.
Janis Pinter	Corporate Compliance Committee	09/21/21	Revision	Move from C13-S02-T21 to C04-S10- T03; no policy or procedure changes needed – remains valid.