

Fraudulent Use of Personal Health Number

1. Introduction

1.1. Purpose

Under the *Medicare Protection Act*, it is an offence to use another person's [personal health number](#) (PHN) or to knowingly allow your [PHN](#) to be used by another person. This policy establishes the correct procedures to be followed when dealing with a [client](#) suspected to be using another beneficiary's BC [PHN](#) when presenting for health care services at a Vancouver Coastal Health (VCH) or Providence Health Care (PHC) [facility](#).

1.2. Scope

This is a joint policy between Providence Health Care (PHC), Provincial Health Services Authority (PHSA) and Vancouver Coastal Health (VCH). This policy applies to all [registration staff](#) as well as any VCH or PHC [staff](#) member who has reasonable grounds to believe that a [client](#) is misrepresenting their identity in relation to another beneficiary's [PHN](#), regardless of the reasons for which that [client](#) may be undertaking this false representation.

2. Policy

2.1. Reporting and Registration

VCH and PHC are ethically and legally obligated to provide emergency health care to any individual in need, regardless of that individual's insurance status and ability to pay. However, all [staff](#) members have a duty to report suspected fraud or Medical Services Plan (MSP) misuse.

All [clients](#) must be registered and cared for with the assumption that the information provided is correct. [Staff](#) will follow registration and authentication requirements as described in the [VCH Authentication of Clients](#) policy or the [PHC Identification of Clients Accessing Health Services](#) policy.

When a [client](#) is suspected of fraudulently presenting another beneficiary's [PHN](#) or [health care card](#), the [registration staff](#) member must proceed normally with the registration process.

Once registration is complete, [registration staff](#) must notify their clinical leader and the [registration supervisor](#) of the suspected fraudulent activity. The [registration supervisor](#) will then evaluate whether they believe the case should be reported to Health Information British Columbia (HIBC).

Upon direction from the [registration supervisor](#), [registration staff](#) must notify HIBC at 604-683-7151 (Metro Vancouver) or 1-800-663-7100 (elsewhere in BC) of the suspected fraud. HIBC will conduct an investigation of the suspected fraudulent activity.

When reporting the suspected [PHN](#) fraud, the [staff](#) member must provide as much information as possible – the name, ID number and description of cardholder.

2.2. Follow-up

No further action is required by [staff](#) until HIBC advises VCH or PHC that fraud has taken place. Until HIBC has confirmed the fraud, the [client](#) in question must be treated as usual.

Upon receiving confirmation of fraud from HIBC, the affected medical record(s) must be corrected by Records Management and Data Quality at VCH sites or by Health Records and Data Quality at PHC sites.

3. Responsibilities

3.1. Registration Staff

[Registration staff](#) are responsible for authenticating the identity of every [client](#) who presents to a VCH or PHC [facility](#) for health services.

In cases where the [registration staff](#) suspects that the [client](#) is not who they say they are, or is using someone else's [PHN](#), [registration staff](#) are responsible for reporting the suspected fraud to the [registration supervisor](#) and to the clinical leader.

If directed to do so by the [registration supervisor](#), [registration staff](#) are responsible for reporting the suspected fraud to HIBC.

3.2. Registration Supervisor

The [registration supervisor](#) is responsible for establishing procedures for [registration staff](#) to report cases of suspected fraud.

The [registration supervisor](#) is responsible for ensuring that all [registration staff](#) are aware of the need to report cases of suspected fraud and the procedures for doing so.

The [registration supervisor](#) is responsible for evaluating cases of potential fraud brought to them by [registration staff](#) and directing the specific [staff](#) member to report the case to HIBC should they deem it suspicious.

The [registration supervisor](#) at PHC sites will inform the Registration Standards & Data Quality office that a case of suspected fraud has been reported to HIBC.

3.3. The Office of Health Information Management (HIM)

The Office of HIM Registration Standards is responsible for establishing and maintaining this policy with regards to reporting potential fraud and ensuring that these policies adhere to Ministry of Health requirements.

3.4. VCH Client Relations and Risk Management (CRRM) and PHC Registration Standards & Data Quality (RSDQ)

VCH CRRM and/or PHC RSDQ will receive a confirmation from HIBC that fraud has been committed if the [PHN](#) investigated was used at their respective organization.

They are responsible for notifying Records Management/Health Records and Data Quality within their respective organizations of the confirmed fraud.

3.5. VCH Records Management/PHC Health Records

Records Management/Health Records is responsible for ensuring that appropriate action is taken to the affected medical records when they receive confirmation of fraud from VCH CRRM or PHC Registration Standards and Data Quality.

3.6. Data Quality

Data Quality is responsible for making the necessary corrections, moves, and updates to affected [electronic health records \(EHRs\)](#) and Patient Care Information Systems when they receive confirmation of fraud.

Data Quality is responsible for coordinating the corrective actions being performed in the [EHRs](#) with any affected [downstream systems](#) to ensure the integrity of the [EHRs](#).

4. Compliance

[Staff](#) who suspect that a person is attempting to access or has accessed health care services inappropriately are required by law to report this to HIBC.

5. Supporting Documents

5.1. Related Policies

- [Authentication of Clients](#) (VCH CA_2000)
- [Identification of Clients Accessing Health Services](#) (PHC CPV1300)

5.2. Guidelines/Procedures/Forms

None

6. Definitions

“Client” means a patient, resident or person receiving care or services from VCH or PHC.

“Downstream System” means any external or third party system that is fed information from the main system used for registration, typically through an interface.

“Electronic Health Record (EHR)” means a collection of health and demographic information about a specific client. This includes (among other items): records of visits to health care facilities, demographic information about the client, medical images and test results, dictation and transcripts.

“Facility” means any hospital, clinic, building or other physical location where VCH or PHC provide health care.

“Health Care Card” means a piece of government issued identification that shows a client’s provincial health insurance number. In British Columbia, this is the PHN and can be found on both the Care Card and the BC Services Card.

“Personal Health Number (PHN)” means a unique numeric identifier assigned to each individual who obtains health services in British Columbia. This includes non-residents (e.g. a patient from out of the country) and those persons who are ineligible for MSP. Assigning a PHN to a patient does not make them eligible for publicly funded health care via MSP.

“Registration Staff” means any staff member registering a client at a VCH or PHC facility.

“Registration Supervisor” means the VCH or PHC staff member tasked with leading registration staff at one or more VCH or PHC facilities.

“Staff” means all employees (including management and leadership), medical staff (including physicians, midwives, dentists, and nurses), residents, fellows and trainees, health care professionals, students, volunteers, contractors, researchers and other service providers engaged by VCH or PHC.

7. References

None

8. Appendices

None

9. Contact

Email

- PHC/VCH: RegistrationBA@providencehealth.bc.ca

Phone

- PHC: Registration Standards & Data Quality office, 1080 Howe Street, 604-806-8106
- VCH: Please contact Registration Services for your site