



Garfunkel, Wild & Travis, P.C.

New York New Jersey Connecticut

Legal Alert

November 2009

UPDATE!

DELAY IN ENFORCEMENT DATE FOR THE RED FLAG RULES

The Federal Trade Commission ("FTC") recently announced that it will again delay enforcement of the new Red Flag Rules until June 1, 2010. There have been several prior delays to the enforcement date since the Rules were adopted.

A copy of the FTC Press Release regarding the extension can be found at:

www.ftc.gov/opa/2009/10/redflags.shtm

The Red Flag Rules require "creditors" and financial institutions to implement programs to identify, detect and respond to indicators of identity theft (so-called Red Flags). For purposes of the Red Flag Rules, "creditors" has been broadly defined to include any business that defer payment for goods and services. As a result, many health care providers and institutions are considered to be "creditors" and are required to implement an identity theft compliance program.

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GWT can assist your business in complying with the Red Flags Rules. GWT has developed a cost-effective program which includes a sample Red Flags policy and a host of tools to assist your business in implementing the Red Flags rules.

Please contact a GWT attorney today for more information so that you can make the most productive use of this extra time.

About Garfunkel, Wild & Travis, P.C.

Garfunkel, Wild & Travis, P.C. was founded in 1980 with a single purpose in mind: to become a pre-eminent health care law firm attending to the unique business and legal needs of its clients. Since then, the firm has grown to over 80 attorneys devoted to addressing the complex legal, regulatory, business and financial needs of its diverse clients.

If you have any questions regarding this Legal Alert, please contact Patrick J. Monahan II, Esq. at (203) 316-0483.

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