

South Florida Associates, P.A.

Dear Patient,

The Federal Trade Commission (FTC) has released a new rule to protect consumers from IDENTITY THEFT, which is now becoming known as the "Red Flag Rule." The new rule now requires any corporation which extends credit to implement a written identity theft prevention program. Under the FTC's guidelines, physicians who regularly bill their patients for services rendered (including copayments, co-insurance and deductibles) are considered creditors and therefore must comply with the "Red Flag Rules."

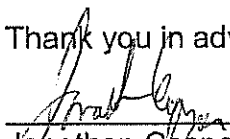
As a result, South Florida ENT Associates, P.A. will now require the following information from all patients to ensure the identity of the person being seen:

1. Drivers License or state issued form of identification with picture (passport, military ID)
2. Proof of Insurance

Once we have validated that the patient being seen matches the information provided, we will store this proof in the patient's medical record and capture a current photograph of the patient for future visits. This photograph eliminates the need to ask for this information in the future unless something changes.

We regret any inconvenience this may cause. We do ask that you remember that, just like many other institutions, South Florida ENT Associates, P.A. must abide by federal law to keep your information protected. As a result, we have very rigid policies and procedures to insure that your records remain confidential and well-safeguarded.

Thank you in advance.



Jonathan Cooper, MD
Chairman of the Board of Directors

2. Staff Training and reporting

- a. Employees whose role requires participation in implementing the Program will be trained by or under the direction of Compliance Manager. The employees must report to the Compliance Manager at least annually on compliance by the organization with the program.
- b. The report shall address material matters related to the program and evaluate issues such as:
 - i. The effectiveness of the policies and procedures in addressing the risk of identity theft in connection with the opening of covered accounts and with respect to existing covered accounts;
 - ii. Significant incidents involving identity theft and management's response;
 - iii. Recommendations for material changes to the program.

Oversight of Service Provider Arrangements:

South Florida ENT Associates, P.A. (SFENTA) will take steps in enforcing policy and procedures in place for all covered accounts, which will be designed to detect, prevent and mitigate risk of identity theft. The Organization will take steps to ensure that the activity of a service provider is conducted in accordance with the reasonable policies and procedures designed to protect all covered accounts.

Duties Regarding Address Discrepancies:

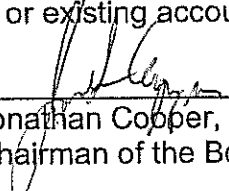
The address discrepancy requirement attaches to any user of a nationwide credit report. The organization will develop policies and procedures designed to enable the organization to form reasonable belief that a credit report relates to the customer for whom it was requested if the organization receives a notice of address discrepancy from a nationwide consumer reporting agency indicating the address given by the consumer differs from the address contained in the consumer report.

SFENTA may reasonably confirm that an address is accurate by any of the following means:

- 1. Verification of the address with the patient;
- 2. Verification of the address through third-party sources; or
- 3. Verifying the information in the consumer report provided by the consumer reporting agency with the customer.
- 4. Other reasonable means.

Conclusion:

SFENTA, will train and educate the staff, and create awareness about Identity Theft, and possible Red Flags. If an employee is suspicious, and or receives information about a covered account, they are to notify their Practice Site Administrator and /or Care Center Manager immediately, The Compliance Manager will be notified, and SFENTA will set its response plan in motion when a red flag is raised. Medical Identity Theft is an emerging issue that raises concerns for patients, and we shall detect, prevent and mitigate identity theft in connection with the opening of a covered account, or existing account.

Approved by: 
Jonathan Copper, MD
Chairman of the Board of Directors

Stacey Citrin,
Chief Executive Officer