

VII. STANDING COMMITTEES**B. Finance, Audit and Facilities Committee**Red Flag Rules – Identity Theft Compliance Program Annual ReportINFORMATION

The Fair and Accurate Credit Transaction Act of 2003, and subsequent amendments in 2005, 2007, and 2010, created the Identity Theft Red Flags and Address Discrepancies program to be administered by the Federal Trade Commission (FTC).

This program requires ‘financial institutions’ and ‘creditors,’ which includes the University of Washington due to its role in issuing and collecting loan funds, to create an identity theft reduction program.

This report fulfills the FTC mandated annual reporting requirements to the Board of Regents Finance, Audit, and Facilities Committee.

PREVIOUS BOARD ACTIONS

July 2009 Red Flag Rules program and policies approved by Regents

GOVERNANCE AND MANAGEMENT

Student Fiscal Services (a department in Finance and Facilities) is responsible for the administration of the Red Flag Rules Program for all non UW Medicine offices. The UW Medicine Board Compliance Committee has oversight of the Identity Theft Prevention Program managed by UW Medicine Compliance; the respective Boards for UW Physicians, Children’s University Medical Group, Harborview Medical Center, Northwest Hospital, and Valley Medical Center oversee UW Medicine’s entity-specific programs.

UW Medicine Patient Identity Clarification Committees (PICC) continue to receive, investigate, and recommend resolution of complaints of misidentification (including, but not limited to identity theft).

PROGRAM ACCOMPLISHMENTS

Since the initial Red Flag Rules annual report in July 2010, a website was created that includes information on how to identify and detect Red Flags, how to respond to Red Flags, how the Red Flags Compliance Program is administered, and contact information for the Red Flag Rules compliance coordinators. The website

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also includes a list of outside resources and a link to Administrative Policy Statement 35.2 – Identity Theft Prevention: Red Flag Rules.

Three possible instances of identity theft were uncovered by Student Fiscal Services during FY2011. Two of these involved taking out a short-term loan in the name of another student. The third involved the acquisition and use of a credit card by an unauthorized user. Student Fiscal Services worked with, and is continuing to work with, the relevant legal authorities involved in each case.

UW Medicine Compliance has investigated 15 incidents regarding potential identity theft, resulting in only one substantiated claim. In FY12 to date, the UW Medicine PICCs have investigated 51 incidents of potential identity theft.

Other accomplishments include the creation and implementation of a training program that involves meeting individually with all University offices and units that are required to meet the Red Flag Rules as opposed to the optional training sessions offered in previous years.

Lastly, the implementation of a proactive identity theft prevention and identification program in Student Fiscal Services that looks for suspicious documents, suspicious personal identifying information, and/or suspicious account activity has been completed.

FY12 GOALS

Our primary goal for FY2012 is to again meet directly with all University offices and units required to meet Red Flag Rules. These meetings are designed to provide program updates and information on identifying and responding to potential identity theft.

An ongoing goal will be to continue to identify and report all suspected instances of identity theft.