VII. STANDING COMMITTEES

B. Finance, Audit and Facilities Committee

Red Flag Rules – Identity Theft Compliance Program Annual Report

BACKGROUND

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 AND UPDATES

July 2009	Finance, Audit and Facilities Committee – Approval of Program and Policies
July 2010	Finance, Audit and Facilities Committee – Informational Update
July 2011	Finance, Audit and Facilities Committee – Informational Update
July 2012	Finance, Audit and Facilities Committee – Informational Update

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 and the respective Boards or Committees of UW Physicians, Children's University Medical Group, Harborview Medical Center, UW Medical Center, Northwest Hospital, and Valley Medical Center have oversight for the UW Identity Theft Prevention Programs which are managed by UW Medicine Compliance, UWP Compliance, and CUMG Compliance.

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

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PROGRAM ACCOMPLISHMENTS

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

In addition to maintaining the Red Flag Rules website, a training program has been implemented that involves communicating directly and providing program and/or rule updates with all University of Washington offices and units that are required to meet the Red Flag Rules.

Student Fiscal Services has a proactive identity theft prevention and identification program that looks for suspicious documents, suspicious personal identifying information, and/or suspicious account activity in place. This program is reviewed and updated annually.

COMPLIANCE UPDATES

Neither Student Fiscal Services nor any other non UW Medicine office reported observing or identifying the presence of suspected identity theft during FY2013 to date.

In FY13 to date, UW Medicine Compliance and the UW Medicine PICCs investigated 51 incidents of potential identity theft. Of those incidents, 32 were determined to constitute identity theft, 7 were registration errors and 12 were unsubstantiated claims. For the 32 identity theft incidents, the patients notified law enforcement, and UW Medicine reconciled the billing and medical records.

FY2014 GOALS

Continue to identify, and then communicate directly with all University of Washington offices required to meet the Red Flag Rules. These discussions are designed to provide program updates and information on identifying and responding to potential identity theft.

Ongoing goal: Continue to identify and report to the appropriate parties all suspected instances of identity theft.