VII. STANDING COMMITTEES

B. Finance and Asset Management Committee

Red Flag Rules – Identity Theft Compliance Program Annual Report

INFORMATION


This program requires ‘financial institutions’ and ‘creditors,’ which includes the University of Washington, to create an identity theft reduction program. The University of Washington is covered under the Red Flag Rules due to its role in:

- Collecting registration and billing information to create patient accounts and/or bill for the provision of healthcare services; and
- Issuing and collecting loan funds.

This report fulfills the FTC mandated annual reporting requirements to the Board of Regents’ Finance and Asset Management Committee.

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 Medicine Identity Theft Prevention Programs which are managed by UW Medicine Compliance, UWP Compliance, and CUMG Compliance.

UW Medicine hospitals and clinics and other entities maintain operational procedures that support the implementation of program policies.

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
B. Finance and Asset Management Committee

Red Flag Rules – Identity Theft Compliance Program Annual Report (continued p. 2)

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.

UW Medicine maintains an Identify Theft Prevention Program (ITPP) to help detect, prevent and mitigate any identity theft involving patients. In addition to a UW Medicine-specific ITPP policy, operational procedures and training, the ITPP includes Patient Identification and Clarification Committees (PICC) that receive, investigate, and recommend resolution of complaints of misidentification (including, but not limited to identity theft).

COMPLIANCE UPDATES

In FY 2015 to date, Student Fiscal Services reported observing or identifying no instances of identity theft in relation to the 3,607 institutional loans disbursed to students.

In FY 2015 to date, Student Fiscal Services identified 29 possible instances of fraud/identity theft among the 4,404,897 credit card payments processed across campus. In each instance, documentation was provided to the requisite financial institutions. There is an active law enforcement investigation related to one instance.

In FY2015 to date, UW Medicine Compliance and the UW Medicine PICCs investigated 59 incidents of potential identity theft. Of those incidents, 50 were determined to constitute identity theft, 4 were registration errors and 5 were unsubstantiated claims. For the 50 identity theft incidents, the patients notified law enforcement, and UW Medicine reconciled the billing and medical records.
VII. STANDING COMMITTEES

B. Finance and Asset Management Committee

Red Flag Rules – Identity Theft Compliance Program Annual Report (continued p. 3)

ONGOING GOALS

Continue to identify, and communicate directly with all University of Washington offices with transactions that may be covered by the Red Flag Rules. These discussions are designed to provide program updates and information on identifying and responding to potential identity theft.

Continue to identify and report to the appropriate parties, all suspected instances of identity theft.

PREVIOUS BOARD ACTIONS AND UPDATES

| July 2009 | Finance, Audit and Facilities Committee – Red Flag Rules program and policies approved |
| 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 |
| July 2013 | Finance, Audit and Facilities Committee – Informational Update |
| July 2014 | Finance, Audit and Facilities Committee – Informational Update |