STANDING COMMITTEES

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 Administration) 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
STANDING COMMITTEES

Finance and Asset Management Committee

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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.

Student Fiscal Services has initiated a service agreement with student loan servicer ECSI to further track and report suspected identity theft attempts related to the University loan portfolio and student loan repayment.

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 FY2018 to date, Student Fiscal Services, working with student loan servicer ECSI, identified 62 potential Red Flag instances among 13,509 student loan borrowers. Access was denied to the accounts and the borrowers were notified of the unsuccessful attempt to access their account. These accounts were flagged and borrowers were required to provide additional identifying information when next accessing their account.

In FY2018 to date, Student Fiscal Services identified 15 possible instances of fraud/identity theft among the 4M+ credit card payments processed across campus. This represented an 86% reduction from FY2017. In each instance, documentation was provided to the requisite financial institutions.

In FY2018 to date, UW Medicine Compliance and the UW Medicine PICCs investigated 24 incidents of potential patient misidentification in UW Medicine
clinical settings. Of those incidents, 9 were determined to constitute identity theft. The remaining 15 investigated incidents included 9 registration errors and 6 unsubstantiated claims. For the 24 identity theft incidents, the victim patients were directed to notify law enforcement, and UW Medicine reconciled their billing and medical records to ensure only accurate information is attributed to their patient accounts.

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.

For FY2019, UW Medicine Compliance is reviewing all processes supporting compliance with the Red Flag Rules and exploring potential enhancements to both the processes and annual reporting.

PREVIOUS BOARD ACTIONS AND UPDATES

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<td>Program and policies approved</td>
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