

University of California, Los Angeles
Identity Theft Prevention “Red Flags Rule” Implementation Plan Template

Note: Once an Implementation Plan is completed, it is to be considered a confidential document and not for public disclosure. Employees who prepare the plan or have access to it must take appropriate steps to ensure that the data therein is securely maintained.

This Implementation Plan is submitted in compliance with Part 681 of the Code of Federal Regulations implementing Sections 114 and 315 of the Fair and Accurate Credit Transactions Act (FACTA) of 2003, pursuant to the Federal Trade Commission's Red Flags Rule (“Rule”), and in accordance with the University of California Identity Theft Prevention “Red Flags Rule” Implementation Plan, and the University of California, Los Angeles Identity Theft Prevention “Red Flags Rule” Implementation Plan (UCLA Implementation Plan).

This Plan establishes departmental requirements and guidelines pursuant to the UCLA Implementation Plan including:

- Clearly identifying and documenting Covered Accounts.
- Establishing sources to identify Red Flags.
- Identifying the controls to detect, prevent and mitigate Identity Theft.
- Providing employee training.
- Ensuring compliance by third party service providers.

Department Name: _____

- 1) **Covered Accounts:** The matrix attached to the UCLA Implementation Plan identifies the accounts covered by the Red Flag Rules. The Matrix will be updated periodically.
- 2) **Identified Red Flags:**
 - a) **Notifications and Warnings:**
 - b) **Suspicious Documents:**
 - c) **Unusual Use of Accounts:**
 - d) **Suspicious Identifying Information:**
- 3) **Detection of Red Flags:** The following actions will be taken to verify identity, authenticate customers, monitor transactions, and/or verify the validity of address changes:
- 4) **Mitigation of Identity Theft:**
- 5) **On-Going Oversight and Plan Review:**

6) Third Party Contract Compliance:

7) Employee Training:

Submitted by: _____ Title: _____

Date: _____

Red Flags Rule Covered Accounts Inventory Matrix Template

Department Name: _____

Date: _____

[illegible]

Red Flag Regulation Compliance Campus - Effective <date>

Identified Account	Responsible Dept/Individual	Relevant Red Flags	Detection Mechanism	Response Required	Resolution	Oversight	Program Update	Sr Mgmt Sign-Off	Staff Training	3rd Party Comply
Covered Account A		Verify ID for alteration or forgery	View identification	Notify mgmt, no assistance	Retain card, report	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		Verify the ID picture matches the customer	View identification	Notify mgmt, no assistance	Retain card, report	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		Verify information on ID is consistent with information on file	View identification	Notify mgmt, no assistance	Retain card, report	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
	Sample Detailed steps for a covered account	Verify requests for information updates are not altered, forged, or destroyed and reassembled	Scrutinize paperwork submitted	Notify mgmt, no assistance	Retain paperwork, require new	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		No information shared if FERPA restriction	FERPA flag in BAR	No assistance	No assistance	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		UID matches another customer.	System pulls up two identities	Notify mgmt, no assistance	Investigate and resolve with management	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		Account is not consistent with regular patterns of activity	Large deposits, rapid depletion of funds	Notify mgmt, no assistance	Investigate and resolve with management	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		Call or email if mail is returned twice	Return mail documentation 448 screen	Notify mgmt	Investigate and resolve with management	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		Three different address changes in the past ninety (90) days.	Return mail documentation 448 screen	Notify mgmt	Investigate and resolve with management	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
		No information on an account if no UID and customer name	Customer reports via phone, email, in person	Notify mgmt, no assistance	Notify mgmt, no assistance	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A
	No response regarding medical type services	Customer reports via phone, email, in person	No assistance	No assistance	Fraudulent activity - report to Director	Review and update annually	AVC	Annually	N/A	
Covered Account B										