

**University of California, Merced 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, Merced Identity Theft Prevention "Red Flags Rule" Implementation Plan (UC Merced Implementation Plan).

This Plan establishes departmental requirements and guidelines pursuant to the UC Merced 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 UC MERCED 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:**

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
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
		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
		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
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
		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
		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
		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
		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
		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

