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Red Flag Regulation Compliance Procedures

Effective May 31, 2010									
Identified Account	Relevant Red Flags	Detection Mechanism	Response Required	Resolution	Oversight	Program Update	Sr Mgmt Sign-Off	Staff Training	Compliance
Student Account accessed on any CSUF system or e-market site	Verify ID for alteration or forgery	View identification	Notify mgmt, no customer assistance	Retain card, report	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Verify the ID picture matches the customer	View identification	Notify mgmt, no customer assistance	Retain card, report	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Verify information on ID is consistent with information on file	View identification	Notify mgmt, no customer assistance	Retain card, report	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Verify requests for information updates are not altered, forged, or destroyed and reassembled	Scrutinize paperwork submitted	Notify mgmt, no customer assistance	Retain paperwork, require new	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	No information shared if FERPA restriction	FERPA flag in CMS SA	No customer assistance	No customer assistance	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	CWID matches another customer.	System pulls up two identities	Notify mgmt, no customer assistance	Investigate and resolve with Admissions & Records	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Account is not consistent with regular patterns of activity	Large deposits	Notify mgmt, no customer assistance	Investigate and resolve with management	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Call or email if mail is returned twice	Return mail documentation hold on account	Notify mgmt	Investigate and resolve with management	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Three different address changes in the past ninety (90) days.	Return mail documentation hold on account	Notify mgmt	Investigate and resolve with management	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Unauthorized charges or transactions	Customer reports via phone, email, in person	Notify mgmt, no customer assistance	Investigate and resolve with management	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Notification by customer, identity theft victim, law enforcement authority, or other person that has opened or manipulated a fraudulent account	Customer reports via phone, email, in person	Notify mgmt, no customer assistance	Investigate and resolve with management	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	No information to potential victim of identity theft without evidence of a Police Case Number or an FTC affidavit of identity theft		Notify mgmt, no assistance	Investigate and resolve with management	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	No information on an account if no CWID and customer name	Customer reports via phone, email, in person	Notify mgmt, no assistance	Notify mgmt, no assistance	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	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 SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
Installment Payment Plans (In-person)	Verify ID for alteration or forgery	View identification	Notify mgmt, no customer assistance	Retain card, report	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Verify the ID picture matches the customer	View identification	Notify mgmt, no customer assistance	Retain card, report	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Verify information on ID is consistent with information on file	View identification	Notify mgmt, no customer assistance	Retain card, report	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A
	Verify requests for information updates are not altered, forged, or destroyed and reassembled	Scrutinize paperwork submitted	Notify mgmt, no customer assistance	Retain paperwork, require new	Fraudulent activity - report to Director SFS or Controller	Review and update annually	AVP Finance	Annually	N/A

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Red Flag Regulation Compliance Procedures Effective May 31, 2010 Sr Mgmt Staff **Program Relevant Red Flags** Oversight **Identified Account Detection Mechanism** Response Required Resolution Compliance Sign-Off **Training** Update FERPA flag in CMS SA No assistance No information shared if FERPA No assistance Fraudulent activity -Review and AVP Annually N/A report to Director SFS update annually restriction Finance or Controller CWID matches another customer. System pulls up two Notify mgmt, no Investigate and resolve Fraudulent activity -Review and AVP Annually N/A report to Director SFS identities customer assistance with Admissions & update annually Finance Records or Controller Account is not consistent with regular Review and AVP Annually N/A Large deposits or Notify mgmt, no Investigate and resolve Fraudulent activity report to Director SFS update annually patterns of activity refund requests customer assistance with management Finance or Controller TitanCard Stored Value Card Verify ID for alteration or forgery View identification Fraudulent activity -AVP Annually N/A Notify mgmt, no Retain card, report Review and assistance report to Director SFS update annually Finance or Controller AVP Verify the ID picture matches the View identification Notify mgmt, no Retain card, report Fraudulent activity -Review and Annually N/A report to Director SFS update annually customer assistance Finance or Controller Verify information on ID is consistent View identification AVP N/A Notify mgmt, no Retain card, report Fraudulent activity -Review and Annually with information on file assistance report to Director SFS update annually Finance or Controller Verify requests for information updates AVP N/A Scrutinize paperwork Notify mgmt, no Retain paperwork, Fraudulent activity -Review and Annually report to Director SFS update annually are not altered, forged, or destroyed submitted assistance require new Finance and reassembled or Controller AVP CWID matches another customer. System pulls up two Notify mgmt, no Investigate and resolve Fraudulent activity -Review and Annually N/A identities assistance with management report to Director SFS update annually Finance or Controller AVP N/A Account is not consistent with regular Large deposits, rapid Notify mgmt, no Investigate and resolve Fraudulent activity -Review and Annually report to Director SFS update annually patterns of activity depletion of funds with management assistance Finance or Controller Unauthorized charges or transactions AVP Customer reports via Notify mgmt, no Investigate and resolve Fraudulent activity -Review and Annually N/A originating with SFS report to Director SFS update annually phone, email, in person assistance with management Finance or Controller N/A Unauthorized charges or transactions Refer to department for Forward to department Review and AVP Annually Customer reports via Fraudulent activity assistance Finance report to Director of update annually originating with department phone, email, in person department originating charges Notification by customer, identity theft Customer reports via Notify mgmt if an SFS Investigate and resolve Fraudulent activity -Review and AVP Annually N/A victim, law enforcement authority, or phone, email, in person charge. Refer to with management report to Director SFS |update annually Finance department for or Controller other person that has opened, discovered or manipulated a fraudulent investigation if departmental charge. account No assistance No information to potential victim of Customer reports via Notify mgmt, no Investigate and resolve Fraudulent activity -Review and AVP Annually N/A identity theft without evidence of a phone, email, in person assistance with management or report to Director of update annually Finance Police Case Number or an FTC affidavit refer to department as SFS or responsible of identity theft appropriate department AVP No information on an account if no Customer reports via Notify mgmt, no Fraudulent activity -Review and Annually N/A Notify mgmt, no report to Director SFS update annually CWID and customer name phone, email, in person assistance assistance Finance or Controller