


<p>Office of Employee Benefits</p> <p>Administrative Manual</p> 	<p>ADDRESS CHANGE PROCEDURES FOR UT FLEX DEBIT CARD PARTICIPANTS</p>	<p>572</p>
	<p>EFFECTIVE DATE: NOVEMBER 1, 2008</p>	
	<p>REVISION DATE: AUGUST 1, 2009</p>	
	<p>PURPOSE: Ensure that all requests for address changes associated with a UT FLEX debit card are verified in compliance with 16 CFR 681.1 and 681.2.</p>	
	<p>SCOPE: Employees of The University of Texas System</p>	
	<p>STATUTORY AND ADMINISTRATIVE REFERENCES: 16 CFR 681.1 and 681.2</p>	

1.0 BACKGROUND

The purpose of this rule is to ensure compliance with 16 CFR 681.2 regarding duties of debit card issuers regarding changes of addresses and 16 CFR 681.1 regarding duties in the detection, prevention, and mitigation of identity theft. 16 CFR 681.2 clarifies that a card issuer may satisfy the requirements of that rule if it validates all address changes at the time of receipt of the address change notification or by assessing the validity of an address request change in accordance with its Identity Theft Protection Program before receiving a request for an additional or replacement card.

2.0 INSTITUTION PROCEDURES TO VERIFY EMPLOYEE ADDRESS CHANGES

Institution Benefit Offices must verify the identity of each Employee who requests a change of a mailing address as follows:

2.1 Employee Enters Address Change Online

Institutions that have system capability to allow Employees and/or other individuals to make home address changes online should require the Employee to enter a secure password or PIN to change their address.

2.2 Employee Submits Address Change Via Institutional E-mail:

- The institution Benefits Office may allow an Employee's address change request via institutional e-mail if the Employee must use a secure Password to access their e-mail program to send the e-mail form.

2.3 Employee Makes Address Change in Person

An Employee who comes to the institution Benefits Office to change their address must be required to present a valid photo identification (e.g., Employee ID card, passport, or driver's license) for verification.

2.4 All Other Address Change Requests

An institution that accepts address changes via a non-secure on-line process, telephone, mail, or via an e-mail request that does not come via an Employee's institutional password protected e-mail must verify that the request was made by the requestor by one of the following methods:

- a. If the request is from an Employee with a secure, password protected institutional e-mail account: E-mail the Employee using the Employee's institutional e-mail address and requesting that they verify the address change via return e-mail;
- b. If the request is made via telephone: Require the requestor to verify his or her identity by providing secure information on file for that individual or to correctly answer a pre-selected security question;
- c. Send written notification of the change of address request to the address that was on file for the Cardholder prior to receipt of the change of address that contains instructions for promptly reporting an incorrect address change, or
- d. If the institution has adopted other reasonable policies and procedures as part of an institutional program to prevent, detect and mitigate identity theft (Identity Theft Program) that include processes for validation of address change requests: Follow compliance with the Identity Theft Program.

3.0 PROCESSING OF ADDRESS CHANGES

- 3.1** Any address change made using the methods described in Sections 2.1, 2.2 or 2.3 and any address change made by any other method that has been verified by one of the methods described in Section 2.4 of this Policy will be sent to the U.T. System Office of Employee Benefits (OEB) to update the SGELIG database.
- 3.2** OEB will send the changes to the vendor administering the UT FLEX plan on behalf of OEB. The vendor shall not accept address changes from any source other than a dataset sent from OEB. The vendor shall issue all new or replacement Debit Cards to an Employee by mailing the card directly to the address provided to the vendor by OEB.

4.0 EFFECTIVE DATE OF ADDRESS CHANGE

The effective date of the address change may be either the date the institution Benefits Office receives and verifies the address or the first of the following month.

5.0 Unverifiable Requests

An institution that receives an address request that is not verifiable should notify OEB and then report and investigate the matter pursuant to the institution's Identity Theft Program and/or fraud policies.

Effective Date: November 1, 2008