

I. Purpose

To establish an Identity Theft Prevention Program designed to detect, prevent and mitigate identity theft in connection with the opening of a covered account or an existing covered account and to provide for continued administration of the Program in compliance with the Fair and Accurate Credit Transactions Act of 2003.

II. Scope

This policy applies to all College employees.

III. General

The Program includes procedures to:

- Identify relevant red flags for covered accounts it offers or maintains and incorporates those red flags into the program;
- Detect red flags that have been incorporated into the program;
- Respond appropriately to any red flags that are detected to prevent and mitigate identity theft; and
- Ensure the program is updated periodically to reflect changes in risks to students and the safety and soundness of the creditor from identity theft.
- The program shall, as appropriate, incorporate existing policies and procedures that control reasonably foreseeable risks.

IV. Responsibility

Responsibility for the interpretation and administration of this policy is delegated to the Chief Financial Officer or designee.

Adopted: April 20, 2009

Revised: 12/17/2018, 11/15/2021