

### **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