Policy Title	Original Adoption Date	Policy Number
Identity Theft Prevention Program	11/01/11	SS-264
Responsible College Division/Department	**Responsible College Manager Title**	
Student Success	Vice President of Student Success	

Policy Statement

The Identity Theft Prevention Program is designed to detect, prevent, and mitigate Identity Theft in connection with opening a covered account or existing covered account and to provide administration of the program. The College's program will:

- Identify relevant Red Flags for covered accounts it offers or maintains and incorporate 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
- Ensure the program is updated periodically to reflect changes in risks to students and to the safety and soundness of the creditor from Identity Theft
- Assign a staff member to provide oversight and administration of the program
- Train staff, as necessary, to effectively implement the program
- Exercise appropriate and effective oversight of service provider arrangements

Reason for Policy

Section 114 of the Federal Trade Commission's Fair and Accurate Credit Transactions Act of 2003 created the Red Flags Rule. This regulation requires the College to have an Identity Theft Prevention Program. In 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act amended the FCRA to add the Commodity Futures Trading Commission (CFTC) and Securities and Exchange Commission (SEC) to the list of federal agencies that must jointly adopt and individually enforce identity theft flag rules. In 2013, the SEC and CFTC published their joint final Identity Theft Red Flags Rule and guidelines.

Historical Data, Cross References and Legal Review

Created/Adopted: 11/01/11
Cross References: Identity Theft Prevention Program Procedures
Legal Counsel Review and Approval:
Board Policy: III.F. Asset Protection

Definitions

- Identity theft – is fraud committed or attempted using the identifying information of another person without authority.
- Covered account – is an account that a creditor offers or maintains, primarily for personal, family, or household purposes that involves multiple payments or transactions; and, any other account the College offers or maintains for which there is reasonably foreseeable risk to customers or to the safety and soundness of the College from Identity Theft.
- Red flag – is a pattern, practice or specific activity that indicates the possible existence of identity theft.
- Identifying Information – is any name or number that may be used, alone or in conjunction with any other information, to identify a specific person including: name, address, telephone number, social security number, date of birth, driver license, identification number, alien registration number, government passport, employer or taxpayer identification number, student identification number, computer's Internet Protocol address, or routing code.

The College has identified the following types of accounts that fall under the definition of covered

accounts:

- Refund of credit balances involving PLUS loans
- Refund of credit balances without PLUS loans
- Tuition payment deferments
- Direct deposit/ACH information
- 1098-T information
- Wisconsin Tax Refund Intercept Program accounts
- Delinquent Accounts sent to Collection agency
- Contracted agreements including third-party arrangements
- State Debt Collections accounts