



2.1 Identity Theft Prevention Program Policy

Category: Administration

Name of Responsible Office: Administrative Services

Title of Responsible Executive: CFO and Vice President, Administrative Services

Date Established: June 9, 2009

Date Last Approved: June 11, 2024

Policy

The purpose of this Policy is to prevent frauds committed by the misuse of identifying information (i.e. identity theft). The Policy aims to accomplish this goal by identifying accounts maintained by MCC which may be susceptible to fraud (hereinafter "Covered Accounts"), identifying possible indications of identity theft activity associated with those accounts (hereinafter "Red Flags"), devising methods to detect such activity, and responding appropriately when such activity is detected. This Program will include reasonable steps to prevent frauds perpetrated by the misuse of identifying information including policies and procedures for:

- Identifying "covered accounts"
- Identifying relevant patterns, practices, and forms of activity within those accounts that are "red flags" signaling possible identity theft
- Detecting red flags
- Responding appropriately to any red flags that are detected in order to prevent and mitigate identity theft
- Administering the program in a manner that ensures proper staff training, implementation, oversight, and updating

Background

The Federal Trade Commission (FTC), under the authority granted by the Fair and Accurate Credit Transaction Act of 2003 (FACTA), has issued a Red Flags Rule (16 CFR 681.2) requiring that financial institutions and creditors develop Identity Theft Prevention Programs aimed at recognizing and preventing activity related to identity theft. This Identity Theft Prevention Policy was developed pursuant to a resolution adopted by the Monroe Community College Board of Trustees on June 8, 2009 in order to comply with the Federal Trade Commission's Red Flags Rule (16 CFR 681.2).

Applicability

Program Administrator

The CFO/VP of Administrative Services will oversee administration of this Program. The Program Administrator may designate additional staff of the College to undertake responsibility for training personnel, monitoring service providers, and updating the Program, all under the supervision of the Program Administrator.

Service Providers

The Program Administrator or designees shall review service provider agreements and monitor service providers, where applicable, to ensure that such providers have adequate identity theft prevention programs in place. When the Program Administrator determines that a service provider is not adequately guarding against

threats of identity theft, he/she shall have the authority to take necessary corrective action, including termination of the service provider's relationship with the College.

Training

The Program Administrator or designees shall identify and train responsible staff, as necessary, to effectively implement and apply the Program. All College personnel are expected to assist the Program Administrator in implementing and maintaining the Program. Employees who work with Covered Accounts must be trained in the requirements of the Program. At least one employee shall be directly responsible for detecting and responding to any Red Flags that may arise in association with each Covered Account.

Evaluation

The Program Administrator shall annually evaluate the Program to determine whether it is functioning adequately. This evaluation shall include: a case-by-case assessment of incidents of identity theft or attempted identity theft that occurred during the previous academic year; interviews with Responsible Staff; and a survey of all accounts maintained by the College to identify any additional Covered Accounts. In response to this evaluation, the Program Administrator shall recommend amendments to this Program for approval by the President.

Updating

Program will periodically be updated to respond to changing or emerging threats, taking previous experiences with identity theft into consideration. MCC will periodically review all accounts to determine if additional Covered Accounts exist.

Audits

The Institutional Compliance Officer & Internal Auditor, or other designated internal control officer, may perform audits to determine if various segments of the College are in compliance with the Program.

Recordkeeping

The Program Administrator shall maintain records relevant to the Program, including: The Written Program; documentation on training; documentation on instances of identity theft and attempted identity theft; contracts with service providers that perform activities related to Covered Accounts; and updates to the Written Program.

Definitions

- **Account:** A relationship established with an institution by a student, employee, or other person to obtain educational or financial services.
- **Covered Account:** An account that permits multiple transactions or poses a reasonably foreseeable risk of being used to promote an identity theft.
- **Responsible Staff:** Personnel who regularly work with Covered Accounts and are responsible for performing the day-to-day application of the Program to a specific Covered Account by detecting and responding to Red Flags.
- **Red Flag:** A pattern, practice, or specific activity that indicates the possible existence of identity theft.
- **Response:** Action taken by Responsible Staff member(s) upon the detection of any Red Flag to prevent and mitigate identity theft.
- **Service Provider:** A contractor to the campus engaged to perform an activity in connection with a Covered Account.

- **Identity Theft:** A fraud committed or attempted using the identifying information of another person without authority.

Related Information

College Documents

Identity Theft Prevention Procedure

History

Item	Date	Explanation
Established	June 8, 2009	
Three-Year-Review	2014	No change
Three-Year Review	2017	Recommended updates to properly identify responsible employee for Program Administrator and Audits
College Officer Approval	September 9, 2018	Program Administrator revised to CFO/VP of Administrative Service. Audit revised to Institutional Compliance Officer & Internal Auditor
Five-Year Review	2024	Responsible Office revised to Administrative Services