



IDENTITY THEFT PREVENTION POLICY

Effective Date: August 11, 2009

Reviewed Date: March 15, 2022

Responsible Office: Controller

Division: Finance

I. PURPOSE/OBJECTIVE

To establish reasonable policies and procedures for detecting, preventing, and mitigating identity theft to University students in adherence with the Federal Trade Commission's Red Flag Rules.

II. STATEMENT OF POLICY

Grambling State University developed an Identity Theft Prevention Program ("Program") pursuant to the Federal Trade Commission's Red Flag Rules, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003. The Program contains policies and procedures to identify relevant Red Flags for new and existing covered accounts, detect Red Flags that have been incorporated into the Program, respond appropriately to any Red Flags detected to prevent and mitigate identity theft, and ensure the Program is updated periodically to reflect changes in risks to students or to the safety and soundness of the student from identity theft. A covered account is an account used mostly for personal, family, or household purposes, that involves multiple payments or transactions, and for which there is a foreseeable risk of identity theft.

To identify relevant Red Flags, the University considers the types of accounts that it offers and maintains, methods it provides to open its accounts, methods it provides to access its accounts, and its previous experiences with identity theft. In order to detect any of the Red Flags identified that are associated with the enrollment of a student, University personnel will take steps to obtain and verify the identity of the person opening the account. In the event University personnel detect any identified Red Flags, such personnel shall take one or more steps as outlined in the Program depending on the degree of risk posed by the Red Flag.

Responsibility for developing, implementing, and updating the Program lies with an Identity Theft Committee for the University. The Committee is headed by a Program Administrator who may be the President of the University or his or her appointee. Two or more other individuals appointed by the President of the University or the Program Administrator comprise the remainder of the Committee membership. The Committee will periodically review and update the Program to reflect changes in risks to students and the soundness of the University from identity theft.

University staff responsible for implementing the Program shall be trained either by or under the direction of the Program Administrator in the detection of Red Flags and the responsive steps to be taken when a Red Flag is detected. University employees are expected to notify the Program Administrator once they become aware of an incident or identity theft or of the University's failure to comply with this Program.

III. REVISION/REVISED HISTORY