



Red Flag Rules Identity Theft/Fraud Prevention

I. PROGRAM ADOPTION

Valdosta State University developed this Identity Theft Prevention Program ("Program") pursuant to the Federal Trade Commission's Red Flags Rule ("Rule"), which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003. 16 C. F. R. § 681.1.

This Program was developed with oversight and approval of the University's Executive Leadership (President, Chief Academic Officer, Chief Business Officer, Chief Information Officer and Chief Information Security Officer). After consideration of the size and complexity of the entity's operations and business/accounting system(s), and the nature and scope of the entity's activities, the entity's Executive Leadership determined that this Program was appropriate for Valdosta State University, and therefore approved this Program on August, 2013.

II. PROGRAM PURPOSE AND DEFINITIONS

A. Fulfilling requirements of the Red Flags Rule

Under the Red Flag Rule, every financial institution and creditor is required to establish an "Identity Theft Prevention Program" tailored to its size, complexity and the nature of its operation/business. Each program must contain reasonable policies and procedures to:

1. Identify relevant Red Flags for new and existing covered accounts and incorporate those Red Flags into the Program;
2. Detect Red Flags that have been incorporated into the Program;
3. Respond appropriately to any Red Flags that are detected to prevent and mitigate Identity Theft; and
4. Ensure the Program is updated periodically, to reflect changes in risks/threats to customers or to the safety and soundness of the creditor from Identity Theft.

B. Red Flags Rule definitions used in this Program

The Red Flags Rule defines "Identity Theft" as "fraud committed using the identifying information of another person" and a "Red Flag" as a pattern, practice, or specific activity that indicates the possible existence of Identity Theft.

According to the Rule, a creditor is subject to the Rule requirements. The Rule defines creditors "to include finance companies, automobile dealers, mortgage brokers, higher education, companies, telecommunications companies and credit granting entities. Where non-profit and government entities defer payment for goods or services, they, too, are to be considered creditors."

All the Institution's accounts held by customers of the institution are covered by the Rule. Under the Rule, a "covered account" is:

1. Any account the institution offers or maintains, that involves multiple payments or transactions; and



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2. Any other account the institution offers or maintains for which there is a reasonably foreseeable risk to customers or to the safety and soundness of the institution from Identity Theft.

“Identifying information” is defined under the Rule as “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, government issued driver’s license or identification number, alien registration number, government passport number, employer or taxpayer identification number, unique electronic identification number, computer’s Internet Protocol address, or routing code.

III. IDENTIFICATION OF RED FLAGS

In order to identify relevant Red Flags, the institution considers the types of accounts that it maintains, the methods it provides to open its accounts, the methods it provides to access its accounts, and its previous experiences with Identity Theft. The Institution identifies the following red flags, in each of the listed categories:

Red Flags

A. Notifications and Warnings From Credit Reporting Agencies

- 1) Report of fraud accompanying a credit report;
- 2) Notice or report from a credit agency of a credit freeze on a customer or applicant;
- 3) Notice or report from a credit agency of an active duty alert for an applicant; and
- 4) Indication from a credit report of activity that is inconsistent with a customer’s usual pattern or activity.

Red Flags

B. Suspicious Documents

1. Identification document or card that appears to be forged, altered or inauthentic;
2. Identification document or card on which a person’s photograph or physical description is not consistent with the person presenting the document;
3. Other document with information that is not consistent with existing customer information (such as if a person’s signature on a document appears forged); and
4. Application for service that appears to have been altered or forged.

Suspicious Personal Identifying Information

Red Flags

1. Identifying information presented that is inconsistent with other information the customer provides (example: inconsistent birth dates);
2. Identifying information presented that is inconsistent with other sources of information (for instance, an address not matching an address on a credit report);
3. Identifying information presented that is the same as information shown on other applications that were found to be fraudulent;



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4. Identifying information presented that is consistent with fraudulent activity (such as an invalid phone number or fictitious billing address);
5. Social security number presented that is the same as one given by another customer;
6. An address or phone number presented that is the same as that of another person;
7. A person fails to provide complete personal identifying information on an application when reminded to do so (however, by law social security numbers must not be required); and
8. A person's identifying information is not consistent with the information that is on file for the customer.

Red Flags

C. Suspicious Account Activity or Unusual Use of Account

1. Change of address for an account followed by a request to change the account holder's name;
2. Payments stop on an otherwise consistently up-to-date account;
3. Account used in a way that is not consistent with prior use (example: very high activity);
4. Mail sent to the account holder is repeatedly returned as undeliverable;
5. Notice to Valdosta State University that a customer is not receiving mail sent by Valdosta State University;
6. Notice to Valdosta State University that an account has unauthorized activity;
7. Breach in the Institution's computer system security; and
8. Unauthorized access to or use of customer account information.

Red Flag

D. Alerts from Others

1. Notice to Valdosta State University from a customer, identity theft victim, law enforcement or other person that it has opened or is maintaining a fraudulent account for a person engaged in Identity Theft.

IV. DETECTING RED FLAGS

A. New Accounts

In order to detect any of the Red Flags identified above associated with the opening or accepting account information, Valdosta State University personnel will take the following steps to obtain and verify the identity of the person opening the account:

Detect

1. Require certain identifying information such as name, date of birth, residential or business address, principal place of business for an entity, driver's license or other identification;
2. Verify the customer's identity (for instance, review a driver's license or other identification card);
3. Independently contact the customer.

B. Existing Accounts

In order to detect any of the Red Flags identified above for an existing account, Valdosta State University personnel will take the following steps to monitor transactions with an account:



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Detect

1. Verify the identification of customers if they request information (in person, via telephone, via facsimile, via email);
2. Verify the validity of requests to change billing addresses; and
3. Verify changes in banking information given for billing and payment purposes.

V. PREVENTING AND MITIGATING IDENTITY THEFT

In the event Valdosta State University personnel detect any identified Red Flags, such personnel shall take one or more of the following steps, depending on the degree of risk posed by the Red Flag:

Prevent and Mitigate

1. Continue to monitor an account for evidence of Identity Theft;
2. Contact the customer;
3. Change any passwords or other security devices that permit access to accounts;
4. Not open a new account;
5. Close an existing account;
6. Reopen an account with a new number;
7. Notify the Department/Unit Program Administrator for determination of the appropriate steps to take;
8. Notify law enforcement;
9. Determine that no response is warranted under the particular circumstances.

Protect identifying information

In order to further prevent the likelihood of identity theft occurring with respect to Valdosta State University accounts, the University will take the following steps with respect to its internal operating procedures to protect personal identifying information:

1. Ensure that its website is secure or provide clear notice that the website is not secure;
2. Ensure complete and secure destruction of paper documents and computer files containing customer information;
3. Ensure that office computers are password protected and that computer screens lock after a set period of time;
4. Keep offices clear of papers containing customer information;
5. Request only the last 4 digits of social security numbers (if any);
6. Ensure computer virus protection is up to date; and
7. Require and keep only the kinds of customer information that are necessary for Valdosta State University purposes.

VI. PROGRAM UPDATES

This Program will be periodically reviewed and updated to reflect changes in risks to the customer's identity and the soundness of Valdosta State University from Identity Theft.



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VII. PROGRAM ADMINISTRATION

A. Oversight

Responsibility for developing, implementing and updating this Program lies with the Chief Information Officer for Valdosta State University or his or her appointee. The Program Administrator will be responsible for the Program administration, for ensuring appropriate training of Valdosta State University staff on the Program, for reviewing any staff reports regarding the detection of Red Flags and the steps for preventing and mitigating Identity Theft, determining which steps of prevention and mitigation should be taken in particular circumstances and considering periodic changes to the Program.

B. Staff Training and Reports

Valdosta State University staff responsible for implementing the Program shall be trained 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. The Institution may include in its Program how often training is to occur. The Program may also require staff to provide reports to the Program Administrator on incidents of Identity Theft, the Institution’s compliance with the Program and the effectiveness of the Program.

C. Service Provider Arrangements

In the event Valdosta State University engages a service provider to perform an activity in connection with one or more accounts, the University will take the following steps to ensure the service provider performs its activity in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of Identity Theft.

1. Require, by contract, that service providers have such policies and procedures in place; and
2. Require, by contract, that service providers review the Institution’s Program and report any Red Flags to the Program Administrator.

D. Specific Program Elements and Confidentiality

For the effectiveness of Identity Theft Prevention Programs, the Red Flag Rule envisions a degree of confidentiality regarding the Institution’s specific practices relating to Identity Theft detection, prevention and mitigation. Therefore, under this Program, knowledge of such specific practices is to be limited to the Chief Information Officer and those employees who need to know them for purposes of preventing Identity Theft. Because this Program is to be adopted by a public body and thus publicly available, it would be counterproductive to list these specific practices here. Therefore, only the Program’s general red flag detection, implementation and prevention practices are listed in this document.

Affected Stakeholders

Indicate all entities and persons within the university affected by this policy:

- | | | |
|---|---|--|
| <input type="checkbox"/> Alumni | <input checked="" type="checkbox"/> Graduate Students | <input checked="" type="checkbox"/> Undergraduate Students |
| <input checked="" type="checkbox"/> Staff | <input checked="" type="checkbox"/> Faculty | <input checked="" type="checkbox"/> Student Employees |
| <input type="checkbox"/> Visitors | <input type="checkbox"/> Vendors/Contractors | <input type="checkbox"/> Other: _____ |



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Policy Attributes

<i>Responsible Office(s)</i>	Information Technology, 1410 N. Oak St., 229-245-4357, itvsu@valdosta.edu
<i>Approving Officer or Body</i>	President, President's Office, West Hall Suite 1004, 229-333-5952, president@valdosta.edu
<i>Date Effective</i>	08/01/2013
<i>Date Last Reviewed</i>	05/15/2017, 07/01/2020
<i>Next Review Date</i>	07/01/2022