INFORMATION TECHNOLOGY AND SECURITY, NEBRASKA STATE COLLEGE SYSTEM

POLICY: 7004   **Federal Personal Information Security Programs**

BOARD POLICY

Identity Theft Prevention Program

The Board recognizes the importance of identity theft prevention. The Board also recognizes that the Colleges currently maintain certain "covered accounts" as defined by the Federal Trade Commission (FTC) that include loan programs and payment plans. In response to the FTC's issuance of "Red Flag Rules", each College will establish and maintain an Identity Theft Prevention Program that includes identification, detection, prevention and mitigation of identity theft risks. The programs should be periodically reviewed and updated to consider changes to the plan in response to the changing environment.

A Red Flag, as included in the FTC's rules, and also included below, is defined as a relevant indicator of a possible risk of identity theft. The Identity Theft Program should include, at a minimum, the following sections:

1) Identification
   In identifying Red Flags, each College should consider the types of covered accounts it offers and maintains, the methods it provides to open and access its covered accounts, and its previous experiences with identity theft.

2) Detection and Prevention
   Each program should include consideration of the detection of Red Flags in connection with the covered accounts. The program should also include obtaining identifying information about, and verifying the identity of, a person opening a covered account. This information should then be used to authenticate customers, monitor transactions, and verify the validity of change of address requests.

3) Response
   Each program should provide for appropriate responses to detected Red Flags to prevent and mitigate identity theft.

Each program should be reviewed and updated periodically to reflect changes in risks such as:
   *experiences with identity theft
   *changes in methods of identity theft
   *changes in methods to detect, prevent, and mitigate identity theft
   *changes in service provider arrangements

Each College shall submit its initial Identity Theft Program for approval by the Board. Thereafter, a copy of each College's current program and annual report on compliance shall be kept on file at each College. Each College President, or designee, will be responsible for oversight of the Identity Theft Program at their College.

Policy Adopted: 1/13/09
Policy Revised: 3/24/17
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