

# Shawnee State University

AREA: Finance and Administration	POLICY No:	4.78
	ADMIN. CODE:	3362-4-49
	PAGE NO.:	1 OF 2
	Effective Date:	10/01/09
	RECOMMENDED BY:	VP F & A
SUBJECT: Identity Theft Policy: Red Flags Rules	APPROVED BY:	Board of Trustees

## 1.0 Purpose

The purpose of this policy is to assure Shawnee State University's compliance with the Federal Trade Commission's (FTC) "red flag rules" in the detection, prevention, and mitigation of identity theft in connection with the opening of a covered account or an existing covered account and to provide for continued administration of the Program. The Program shall include reasonable policies and procedures to:

- 1.1 Identify relevant red flags for covered accounts it offers or maintains and incorporate those red flags into the program;
- 1.2 Detect red flags that have been incorporated into the Program;
- 1.3 Respond appropriately to any red flags that are detected to prevent and mitigate identity theft; and
- 1.4 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.

## 2.0 Responsibility

Responsibility for developing, implementing and updating this Program lies with the Vice President for Finance and Administration or designee. The Program Administrator assigned by the Vice President will be responsible for the program administration, for ensuring appropriate training of SSU's 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.