Red Flag Identify Theft Prevention Program

Policy Number PRP 5210

Commonwealth University of Pennsylvania

Approved by University Senate, [Date of Approval]

Revised [Date of Revision]

Responsible Office: Student Billing Office

1.   Purpose

The purpose of this policy is to establish an Identity Theft Prevention Program ("Program") designed to detect, prevent and mitigate 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. Identify relevant red flags for covered accounts it offers or maintains 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 to Students and to the safety and soundness of the creditor from identity theft.

The Program shall, as appropriate, incorporate existing policies and procedures that control reasonably foreseeable risks.

2.   Scope

Commonwealth University has identified the following types of covered accounts which are administered by the University or by a Third Party Service Provider:

   a. University Covered Accounts

   a. Refund of credit balances involving student loans
   b. Refund of credit balances without student loans
   c. Deferment of tuition payments

b. Tuition Payment Plan accounts Covered by a Third Party Service Provider

3.   Definitions, Roles and Responsibilities

Identity Theft: Fraud committed or attempted using the identifying information of another person without authority.

Red Flag: A pattern, practice, or specific activity that indicates the possible existence of identity theft.

Covered Account: All student accounts or loans that are administered by the University and involve multiple payments or transactions.

Scope-Covered Accounts: Commonwealth University has identified the following types of covered accounts which are administered by the University or by a Third Party Service Provider:

a. University Covered Accounts

   i.   Refund of credit balances involving student loans
   ii.   Refund of credit balances without student loans
   iii. Deferment of tuition payments
   iv.   Emergency loans

b. Tuition Payment Plan accounts Covered by a Third Party Service Provider

3.1.   Roles and Responsibilities

Theft Committee ("Committee") for the University. The Committee is headed by the Vice President for Administration and Finance. The remainder of the Committee consists of the Director of Admissions, the Registrar, Director of Financial Aid, Director of Finance & Business Services, Director of Human Resources, Director of Administrative Applications, and the Assistant Director of Administration and Technology for Residence Life. The Committee will be responsible for the Program administration, for ensuring appropriate training of University'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.

4.   Policy

The Commonwealth University Identity Theft Prevention Program ("Program") will detect, prevent and mitigate 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.

5. Procedures, Standards, and Guidelines

5.1 The Program shall provide for appropriate responses to detected red flags to prevent and mitigate identity theft. The appropriate responses to the relevant red flags are as follows:

1. Deny access to the covered account until other information is available to eliminate the red flag; Contact the student;
2. Change any passwords, security codes or other security devices that permit access to a covered account;
3. Notify law enforcement; or
4. Determine no response is warranted under the particular circumstances.

6 Compliance and Enforcement

6.1   Every University policy will undergo a regular review on a five-year cycle, with approximately 20% of the total policies inventory being reviewed each year.

6.2   All policy reviews will be conducted by the responsible Senate Committee to assure that the policy remains relevant and aligns with applicable federal and state laws and regulations, PASSHE Board of Governors policies, and other University policies, procedures, standards, or guidelines.

7. Additional Information

6.3   Supporting Documents

6.3.1   [Include title of supporting documentation here.] [Link]

6.4   History

6.4.1   Policy was developed pursuant to the Federal Trade Commission Red Flag Rule, which implemented Section 114 of the Fair and Accurate Credit Transaction Act (FACTA) of 2003.

6.4.2   Effective Date – [Date Approved by the University Senate or Issued by the Office of the President as an Interim Policy]

6.4.3   Revised - [Date of Revision]

6.4.4   Next Review Date - [Date of Revision]

6.5   Related Policies - [Reference related policies]

6.6   Contacts for Additional Information and Reporting

Office of the Registrar (registrar@commonwealthu.edu), Office of Financial Aid (financialaid@commonwealthu.edu) and Student Billing Office (studentbilling@commonwealthu.edu).