

**Identity Theft Prevention**

**Policy Statement**

The University of Southern Mississippi (University) has developed an Identity Theft Prevention policy to assure that personal identifying information collected and managed by the University is secure.

**Reason for Policy/Purpose**

The Red Flags Rule, Section 114 of the Fair and Accurate Credit Transactions Act (FACTA) of 2003 issued by the Federal Trade Commission (FTC), requires financial institutions and creditors that hold accounts covered under the regulation to develop and implement an identity theft prevention program for new and existing accounts.

**Who Needs to Know This Policy**

Any University employee who collects and/or processes person identifying information as outlined in this document.

**Definitions**

* 1. Covered Accounts. An account that a creditor offers or maintains for personal, family or household purposes that involves or is designed to permit multiple payments or transactions.
  2. Creditor. Any entity that regularly extends, renews, or continues credit; any entity that regularly arranges for the extension, renewal, or continuation of credit; or any assignee of an original creditor who is involved in the decision to extend, renew, or continue credit.
  3. Identity Theft. Fraud committed or attempted using the identifying information of another person without authorization.
  4. Personally Identifiable Information. Personally Identifiable Information (PII) is any piece of information, which may be used to uniquely identify, contact, or locate an individual. This PII includes, but is not limited to, taxpayer identification numbers, driver's license numbers, passport identification numbers, passwords, PINs, personal account numbers, computer accounts and passwords, protected health information, financial information, unpublished home addresses or phone numbers, and/or any combination of information that will uniquely identify an individual.
  5. Red Flag. A pattern, practice, or specific activity that indicates the possible existence of identity theft.

**Policy/Procedures**

This policy will establish an Identity Theft Prevention Program designed to prevent, detect and minimize the risk of identity theft in connection with opening and maintaining a ‘covered account’. The program shall include the following:

* Identifying relevant red flags for new and existing covered accounts that the University offers or maintains and incorporate those red flags into the Program;
* Detecting red flags that have been incorporated into the Program, and
* Responding appropriately to detected red flags in order to prevent and mitigate identity theft.
* Updating the program periodically to reflect changes in risks to students, employees, and third parties.

The Assistant Director of Student Financial Services is designated as the program administrator and will exercise appropriate and effective program oversight. The program administrator will work with the departmental or unit administrators in areas impacted by the Red Flags Rule. (See Appendix A for a list of these areas.)

The program administrator shall conduct an annual Program assessment and provide a report to the Associate VP for Finance to include recommended Program changes.

The program administrator is responsible for:

(1) Developing, implementing, assessing, and updating the Program;

(2) Developing and maintaining a training program;

(3) Ensuring compliance of University staff; and

(4) Preparing an annual report to the Associate VP for Finance.

**Review**

The Assistant Director of Student Financial Services is responsible for review of this policy annually.

**Forms/Instructions**

N/A

**Appendices**

Appendix A

The University of Southern Mississippi - Areas That Must Comply With the Red Flags Rule

The following business areas and support units have been determined to fall under the requirements of the FTC Red Flags Rule and must appoint a representative to work with the Program Administrator:

* Office of Admissions
* Alumni Association
* Business Services
* Financial Aid
* Food Services
* Freshman Year Experience
* Health Services
* Housing
* International Student Affairs
* iTech
* Learning Enhancement Center
* Library/Resource Center
* Parking Management
* Photo Services
* Post Office
* Printing Service
* Recreational Sports
* Tax Compliance
* Teacher Ed
* Technology Education
* Textbook/Bookstore

**Related Information**

Identity Theft Prevention Program Procedures

**History**

**Amendments:**