

# Mineral Area College Identity Theft Prevention Program

## *Program*

Mineral Area College (“College”) developed this Identity Theft Prevention Program (“Program”) pursuant to the Federal Trade Commission’s Red Flag Rule (“Rule”), which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003. This Program was developed with consideration of the size of the College’s operations and accounts systems, and the nature and scope of the College’s activities.

## *Purpose*

An Identity Theft Prevention Program is designed to detect, prevent and mitigate identity 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 credit from identity theft.

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

## *Definitions*

**Identity Theft** means fraud committed or attempted using the identifying information of another person without authority.

A **Covered Account** means an account that a creditor offers or maintains, primarily for personal, family, or household purposes that involves or is designed to permit multiple payments or transactions.

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

### ***Covered Accounts***

Mineral Area College had identified four types of accounts of which are Covered Accounts administered by the College.

College Covered Accounts:

1. Refund of credit balances involving PLUS loans.
2. Refund of credit balances without PLUS loans.
3. Installment payment plans for tuition and fees managed by the College.
4. Emergency loans generated by the College from the student emergency loan fund.

### ***Identification of Relevant Red Flags***

The Program considers the following risk factors in identifying relevant Red Flags for Covered Accounts:

1. The types of Covered Accounts as noted above.
2. The methods provided to open Covered Accounts—acceptance to the College and enrollment in classes requires all, or part of the following information:
  - a. Application for Admission with personally identifying information
  - b. High School Transcript, high school diploma or GED certificate
  - c. Official COMPASS or ACT scores
3. The methods provided to access Covered Accounts:
  - a. Disbursement obtained in person requires picture identification
  - b. Disbursement by mail can only be mailed to an address on file

The Program identifies the following Red Flags:

1. Documents provided for identification appear to have been altered or forged.
2. The photograph or physical description on the identification is not consistent with the appearance of the student presenting the identification.

3. A request made from a non-College issued E-mail account.
4. A request to mail something to an address not listed on file.
5. Notice from customers, victims of identity theft, law enforcement authorities, or other persons regarding possible identity theft in connection with Covered Accounts.

## ***Detection of Red Flags***

The program will detect Red Flags relevant to each type of covered account as follows:

1. Refund of a credit balance involving a PLUS loan
  - a. As directed by federal regulations (U.S. Department of Education) these balances are required to be refunded in the parent's name and mailed to their address on file within the time period specified.
  - b. No request is required.
  - c. Red Flag – none as this is initiated by the College.
2. Refund of credit balance without PLUS loan
  - a. Requests from current students must be made in person by presenting a picture ID or in writing.
  - b. The refund check can only be mailed to the address on file or picked up in person by showing picture ID.
  - c. Red Flag – Picture ID not appearing to be authentic or not matching the appearance of the student presenting it.

## ***Response***

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.
2. Contact the student.
3. Change any passwords, security codes or other security devices that permit access to a Covered Account.

4. Notify law enforcement.
5. Determine no response is warranted under the particular circumstances.

### ***Oversight of the Program***

Responsibility for developing, implementing and updating this Program lies with the Assistant Controller. The Assistant Controller will be responsible for the Program administration, for ensuring appropriate training of College'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.

### ***Updating the Program***

This Program will be periodically reviewed and updated to reflect changes in risks to students and the College. At least once per year, while conducting the College's SAS 112 review, the Assistant Controller will consider the College's experiences with identity theft, changes in identity theft methods, changes in identity theft detection and prevention methods, changes in types of accounts the College maintains and changes in the College's business arrangements with other entities. After considering these factors, the Assistant Controller will determine whether changes to the Program, including the listing of Red Flags, are warranted. If warranted, the Program will be updated.

### ***Staff Training***

College staff with responsibility for implementing the Program shall be trained either by or under the direction of the Assistant Controller in the detection of Red Flags, and the responsive steps to be taken when a Red Flag is detected.