



BOV POLICY #24 (2016) STATEMENT ON IDENTITY THEFT PREVENTION

Policy Title:	Statement on Identity Theft Prevention
Policy Type:	Board of Visitors
Policy No.:	Board of Visitors Policy # 24 (2016)
Approved:	March 19, 2021
Responsible Office:	University Controller
Responsible Executive:	Vice President for Finance and Administration
Applies to:	University Community

POLICY STATEMENT

The Norfolk State University Board of Visitors has directed the Division of Finance and Administration to implement Federal regulations, commonly referred to as the “Red Flags Rule,” to combat identity theft. The Red Flags Rule was issued in 2007 by the Federal Trade Commission and federal banking regulatory agencies under [sections 114 and 315 of the Fair and Accurate Credit Transactions Act of 2003, Public Law 108-159](#). Certain entities (as defined in these regulations) are required to develop a written program which includes reasonable policies and procedures to identify, detect, and respond to relevant red flags for covered accounts to prevent and mitigate identity theft.

The Identity Theft Prevention Program is implemented in [Administrative Policy # 41-07 \(2014\)](#) with the goal of helping to protect the institution, faculty, staff and students and other applicable constituents from damages related to the loss or misuse of identifying information due to identity theft.

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PURPOSE

The purpose of the Identity Theft Prevention Program policy is to help detect, prevent and mitigate identity theft in connection with any covered account at Norfolk State University.

CONTACTS

The University Controller officially interprets this policy and is responsible for matters pertaining to this policy as it relates to students. The Vice President for Finance and Administration is the Executive responsible for obtaining approval for any revisions as required by [BOV Policy # 01 \(2014\) Creating and Maintaining Policies](#) through the appropriate governance structures. Questions regarding this policy should be directed to the University Controller.

POLICY CONTENTS

The University shall establish an Identity Theft Prevention Program to help detect, prevent and mitigate identity theft in connection with any covered account. (see [Administrative Policy # 41-07 \(2014\) Identity Theft Prevention Program](#)). An Identity Theft Committee (ITC) shall be established to develop a program which is comprised of existing University policies and procedures that relate to identity theft and incident reporting, along with a plan for the development of new policies and procedures in specific areas. The ITC shall be chaired by the University Controller and include the following individuals (or designees): Controller, Assistant Controller, Bursar, ARMICS Coordinator, Chief Information Officer, Associate Vice President for Human Resources, Associate Vice President for Enrollment Management and University Compliance Officer. The ITC shall report annually, and as requested, to the Finance and Administration Committee of the Board and the President.

The Identity Theft Prevention Program shall include reasonable policies and procedures that control reasonably foreseeable risks by:

1. Identifying relevant red flags for covered accounts it offers or maintains and incorporating those red flags into the program;
2. Detecting red flags that have been incorporated into the Program;
3. Responding appropriately to any red flags that are detected to prevent and mitigate identity theft; and
4. Ensuring the Program is updated periodically to reflect changes in risks to students and employees, and to the safety and soundness of the creditor from identity theft.



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EDUCATION AND COMPLIANCE

Education on red flags rules will be provided through the financial and administration forums. To ensure conformity of the requirement of this policy, the office of the Vice President of Finance will monitor for compliance with this policy annually.

PUBLICATION

This policy shall be widely published or distributed to the University community. To ensure timely publication and distribution thereof, the Responsible Office shall make every effort to:

1. Communicate the policy in writing, electronically or otherwise, to the University community affected by this policy as soon as feasible;
2. Submit the policy for inclusion in the online Policy Library within 14 days of approval; and
3. Failure to satisfy procedural requirements does not invalidate this

policy.

REVIEW SCHEDULE

- Next Scheduled Review: March 2024
- Approved by, date: March 19, 2021
- Revision History: September 23, 2009; May 5, 2010; September 23, 2016; September 15, 2017; December 11, 2020
- Supersedes: Policy # 41.216 Identity Theft Prevention Program (2010)

RELATED DOCUMENTS

- [Federal Trade Commission- Part 681- Identify Theft Rules](#)
- [Administrative Policy # 41-07 Identity Theft Program](#)

FORMS

There are no forms associated with this policy.