The College President will be responsible for establishing an identity theft prevention program in accordance with the Fair and Accurate Credit Transactions Act of 2003, also referred to as the Red Flags Rule. The identity theft prevention program will be designed to detect, prevent, and mitigate the risks that may contribute to identity theft through the identification of warning signs in daily operations, and will address staff training for the effective implementation of the program.

The program includes procedures to: (1) identify relevant red flags such as patterns, practices, and specific forms of activity that signal possible identity theft for the covered accounts 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 detected to prevent and mitigate identity theft; and (4) ensure the program is updated periodically to reflect changes in risks from identify theft.