



## **Identity Theft Red Flag Compliance Plan**

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Revised:

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### **6.8 IDENTITY THEFT RED FLAG COMPLIANCE PLAN (FACTA)**

[Fair and Accurate Credit Transactions Act (Pub. L 108-159)]

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- A. The District shall provide for the identification, detection, and response to patterns, practices, or specific activities (“Red Flags”) that could indicate identity theft of students or employees due to the fact that the District serves as a creditor in relation to its students. The Superintendent/President shall develop procedures to implement an Identity Theft Prevention Program (ITPP) to control reasonably foreseeable risks to students or employees from identity theft. (**Note:** No covered accounts are currently maintained by Chaffey College.)
  
- B. This Plan shall be annually reviewed and updated to reflect changes in risks to students or employees and protect individuals from identity theft. Annually, the Plan Administrator shall consider the College’s experiences with identity theft based on the following changes in: identity theft methods, identity theft detection and prevention methods, types of accounts the College maintains, and the College’s business arrangements with other entities. After considering these factors, the Plan Administrator shall determine whether changes to the Plan, including the listing of Red Flags, are warranted and proceed with updating the Plan.
  
- C. The College shall take steps to ensure that the activity of a service provider is conducted in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of identity theft whenever the organization engages a service provider to perform an activity in connection with one or more covered accounts.