OLD DOMINION UNIVERSITY University Policy

Policy #3011 IDENTITY THEFT PROTECTION (RED FLAG) PROGRAM

Responsible Oversight Executive: Vr 0 (U)0.8 2 (es.in) (r 0 (Omi.)]TS)50 (E)-6 (3.9w 3 ()Tj 0.0

16, Part 681

Electronic Code of Federal Regulations, Title

Code of Virginia Section 18.2186.3, Identity Theft

Board of Visitors Policy 1601- Identity Theft Protection

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<u>Identity Theft</u> – A fraud committed or attempted using the personally identifiable information (PII) of another person without authority.

<u>Personally Identifiable Information (PII)</u> – Any information used to identify a specific person, including, but not limited to, name,

F. PROCEDURES

a. Prevent and Mitigate:

- i. Continue to monitor a covered account for evidence of identity theft;
- ii. Contact the student, employee or job applicant;
- iii. Change any passwords or other security devices that permit access to covered accounts;
- iv. Do not open a new covered account;
- v. Provide the student, employee or job applicant with a new identification number;
- vi. Notify the Program Administrator for determination of the appropriate step(s) to take;
- vii. Notify law enforcement;
- viii. File or assist in filing a Suspicious Activities Report ("SAR"); or
- ix. Determine that no response is warranted under the particular circumstances.
- b. Protect Personally Identifiable Information (PII):

In order to further prevent the likelihood of identity theft occurring with respect to covered accounts, the University will take the following steps with respect to its internal operating procedures to protect PII:

- i. Ensure that its website containing PII is secure or provide clear notice that the website is not secure;
- ii. Ensure complete and secure d 14.7

Each department or unit within the University that conducts background checks, issues debit cards or issues credit transactions shall annually (prior to November 1) provide the Associate Controller a copy of the written procedures and sign-in sheet used at the annual training session. The Associate Controller shall provide a summary of all procedures and training to the Audit Committee of the Board of Visitors for their review with recommendations, if any, of suggested changes to better identify and react

POLICY HISTORY

Policy Formulation Committee (PFC) & Responsible Officer Approval to Proceed:

/s/ Mary Deneen **Responsible Officer**

Policy Review Committee (PRC) Approval to Proceed:

/s/ Donna W. Meeks Chair, Policy Review Committee (PRC)

Executive Policy Review Committee (EPRC) Approval to Proceed:

/s/ Gregory DuBois Responsible Oversight Executive

University Counsel Approval to Proceed:

/s/ R. Earl Nance University Counsel

Presidential Approval:

/s/ John R. Broderick President

Policy Revision Dates: June 24, 2010; October 30, 2017

Scheduled Review Date: October 30, 2022

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October 24, 2017 Date

Date

October 30, 2017

October 23, 2017

April 11, 2017

October 18, 2017 Date

Date

Date