

Departmental Identity Theft Prevention Plan

PURPOSE: Under the federally-mandated Red Flags Rule, the Texas Tech University is required to establish and maintain an Identity Theft Prevention Program to detect, prevent and mitigate identity theft regarding certain accounts. The following template may be used as a guide for units that must comply under the Identity Theft Prevention Program. This template was adopted from an FTC form. Submit completed form to Cash and Credit Management Services at cash.credit.services@ttu.edu.

UNIT/DEPARTMENT:

Contact Name:	
Contact Phone No:	
Contact E-Mail:	
Date:	

Step 1: Identifying Relevant Red Flags

The first step is to identify the relevant red flags your area may come across that signal that people trying to get products or services from you aren't who they claim to be. See examples at the end of this document. For instance, if you check photo IDs, a classic red flag of identity theft is an inconsistency between the person's appearance and the information on the photo ID. If you know all your customers personally, it's probably not necessary to ask for a photo ID, and this red flag wouldn't be appropriate. Sometimes, the only red flag may be a notice from another source that an identity theft has occurred. Since that red flag applies to everyone, it's included here.

Here are the red flags we have identified: (add lines as needed)

1. Example: Suspicious documentation.
2. Example: Notice from a customer, a victim of identity theft, a law enforcement agency, or someone else that an account has been opened or used fraudulently.
- 3.
- 4.

Step 2: Detecting Red Flags

The second step is to explain how your area will detect the red flags you've identified. For example, perhaps in Step 1 you identified false IDs as a red flag. To detect a false ID, you might consider training your staff to look carefully at the ID to see if the person's appearance is consistent. What if somebody notifies you that an account has been opened or used fraudulently? To make sure those notices don't fall through the cracks, you may decide to require employees to log that kind of notice in a central place or to tell a staff member responsible for responding to red flags.

Here is how we detect the red flags we have identified: (add lines as needed)

1. Example: Customer presents documents to us to verify identity.
- 2.
- 3.

Step 3: Responding to Red Flags

The third step is to decide how your area will respond to any red flags that materialize. For example, say you've identified the risk of false IDs as a warning sign of identity theft, and you've noted that you will train your staff to look for inconsistencies in identification. Your employee has checked the photo ID and detected an inconsistency. What's the next step? Perhaps it's asking for another form of identification – or maybe not providing any products or services until the inconsistency has been resolved. Or imagine you're trying to collect on an unpaid bill, and the person you contact tells you his identity was stolen and he didn't run up that bill. Although it will depend on the circumstances, consider how you might respond. For example, you could ask for proof that an identity theft claim has been filed.

Here is how we respond to the red flags we have identified: (add lines as needed)

1. Example: If identification presented to us does not match, we do not release any information.
- 2.
- 3.
- 4.
- 5.

Service Providers

If and when external service providers are engaged to perform an activity in connection with an account covered by the Red Flags Rule, steps must be taken to ensure the service provider acts in compliance with the University's Identity Theft Prevention Program. This might include steps such as reviewing the service provider's Identity Theft Prevention Program or including language in the contract to confirm compliance.

Here are the service providers we use, and how we confirm compliance: (add lines as needed)

1. Example: Acme Company - The contract with Acme Company contains Red Flags Rule compliance language.
- 2.
- 3.

Describe how you'll train your staff.

List the categories of employees who will be trained to detect red flags, and how they will be trained – for example, during new employee orientation or an annual update.

Here is how we train our staff: (add lines as needed)

1. Example: Customer Service Clerks are trained upon hire, and at least annually thereafter.
2. Example: All staff view the Red Flags Rule training video provided by the Controller's Office. This video is viewed at least annually.
- 3.
- 4.

Thanks for helping the University stop identity theft in its tracks!