

**BROOKDALE COMMUNITY COLLEGE
BOARD POLICY**

4.7001

I. Title of Policy

Red Flag Identity Theft Prevention Program

II. Objective of Policy

The College hereby establishes an identity theft program (“the Program”) to comply with the “Red Flags Rule,” promulgated by the Federal Trade Commission (FTC). The Program is designed to detect, prevent and mitigate identity theft, which is a threat to the well-being of the College community.

III. Authority

The “Red Flag Rule” has been promulgated by the FTC in the FTC’s implementation of Sections 114 and 315 of the Fair and Accurate Credit Transactions Act of 2003, an amendment to the Fair Credit Reporting Act (FCRA) pursuant to U.S.C. 1681s(a)(1).

IV. Policy Statement

The Red Flag Rule requires institutions that hold “covered accounts” (accounts as to which a person makes repeat payments) to develop and implement an identity theft prevention program for new and existing accounts.

The President will develop College Regulations and procedures as required to ensure compliance with the Program which shall include reasonable steps to:

1. Identify relevant Red Flags for covered accounts that the College offers or maintains 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 that are detected to prevent and mitigate identity theft; and
4. Ensure that the Program is updated periodically to reflect changes in risks to College consumers and to the safety and soundness of the College from identity theft.

V. Responsibility for Implementation

President

Lodged: August 13, 2009
Approved: September 10, 2009