

Red Flag

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Scope

The University of Nebraska Omaha (UNO) Red Flag Identity Theft Prevention Program is designed to reduce the risk of identity theft through detection, prevention and mitigation of patterns, practices or activities related to covered accounts ("Red Flags") that could be indicative of potential identity theft.

The Fair and Accurate Credit Transactions Act (FACTA) contains program requirements at 16 CFR 681. The Vice Chancellor for Business and Finance is responsible for implementing the Red Flag Identity Theft Prevention Program and may delegate day-to-day management to the Compliance Officer-Manager, Cashiering/Student Accounts.

Policy Statement

A Red Flag Identity Theft Prevention Program shall include the following activities:

1. Identification of warning signs indication potential identity theft
2. Detection of Red Flags and confirmation of identity of owners of Covered Accounts
3. Response to Red Flags including assessment of the level of notification required
4. Oversight of contracts with vendors who provide services related to Covered Accounts
5. Education of staff regarding the requirements of the Program
6. Annual Program Assessment and Reporting of activities as required by FACTA regulations

Reason for Policy

UNO has based this policy on Regents Policy 6.6.12, Red Flag Identity Theft Prevention Program in response to 16 CFR 681.

Definitions

Covered Account: (i) an account that the University of Nebraska Omaha (UNO) offers or maintains primarily for personal, family or household purposes, that involves or is designed to permit multiple payments or transactions and (ii) any other account that UNO offers or maintains for which there is a reasonably foreseeable risk of identity theft to the customer (i.e. students, parents and/or patients).

Creditor: Any person or organization that extends, renews, or continues credit, including the University who accepts multiple payments over time for services rendered.

Identity theft: Fraud that involves stealing money or getting other benefits by using the identifying information of another person.

Notice of an address discrepancy: A notice that a credit bureau sends to the University of Nebraska Omaha (UNO) when the university has ordered a credit report about a consumer. Mail returned because of improper address is not a Notice under this policy.

Red flag: A pattern, practice or specific activity that could indicate identity theft.

Service Provider: A vendor that provides services directly to the University of Nebraska Omaha (UNO) related to Covered Accounts.

History

This policy was developed and approved prior to the implementation of the campus policy development and approval process approved by the Chancellor's Cabinet in October 2015.

The University of Nebraska does not discriminate based on race, color, ethnicity, national origin, sex, pregnancy, sexual orientation, gender identity, religion, disability, age, genetic information, veteran status, marital status, and/or political affiliation in its programs, activities, or employment.