

A “red flag” is a pattern, practice or specific activity that indicates the possible existence of identity theft.

A “customer” is anyone doing business on a regular basis with the college (i.e. students, parents, etc.)



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The College adopts this identity theft policy to detect, prevent and mitigate identity theft in

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The following red flags are potential indicators of fraud. Any time a red flag, or a situation closely resembling a red flag, is apparent, it should be investigated for verification.

- Alerts, notifications or warnings from a consumer reporting agency;

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Personal identifying information provided is inconsistent when compared against external information sources used by the College. For example:

- The address provided does not match any address in the report from a Consumer Reporting Agency;
- The Social Security number (SSN) has not been issued or is listed on the Social Security Administration's Death Master File; or
- Personal identifying information provided by the customer is not consistent with other personal identifying information provided by the customer. For example, there is a lack of correlation between the SSN range and date of birth.
- Personal identifying information provided is associated with known fraudulent activity as indicated by internal or third-party sources used by the College. For example, the address on an application is the same as the address provided on a fraudulent application.
- Personal identifying information provided is of a type commonly associated with fraudulent activity as indicated by internal or third-party sources used by the College. For example:
 - The address on an application is fictitious, a mail drop; or
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- Notifying the actual customer that fraud has been attempted or detected



- At periodic intervals established in the program, or as required, the program will be re-evaluated to determine whether all aspects of the program are up to date and applicable in the current business environment.

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