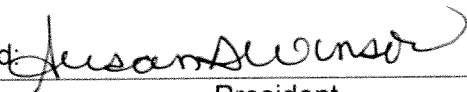


**AIKEN TECHNICAL COLLEGE
PROCEDURE**

Policy Title:	IDENTITY THEFT RED FLAG IDENTIFICATION AND PREVENTION POLICY	Procedure Number: 2-5-107.1
Institutional Authority:	Vice President of Administrative Services	
Associated SBTCE Policy/Procedure:		
Governing ATC Policy:	2-5-107	

Approved: 
President


Vice President of Administrative Services

Date _____
Adopted: _____
Date _____
Revised: _____

DISCLAIMER

PURSUANT TO SECTION 41-1-110 OF THE CODE OF LAWS OF SC, AS AMENDED, THE LANGUAGE USED IN THIS DOCUMENT DOES NOT CREATE AN EMPLOYMENT CONTRACT BETWEEN THE EMPLOYEE AND THE AGENCY.

The purpose of this plan is to develop, implement, and maintain a comprehensive written plan to identify and prevent identity theft affecting covered deferred tuition payment plan accounts, and the employee hiring process. The impetus for creating the plan originates with the Red Flags Rule issued by the Federal Trade Commission (FTC) under sections 114 and 315 of the Fair and Accurate Credit Transactions Act (FACT Act), which amended the Fair Credit Reporting Act (FCRA).

- 1) Identify Red Flags indicating an identity theft
 - a) Red Flag sources
 - i) Inconsistencies in document presentation compared to College records
 - ii) Notices of identity theft forwarded from known sources such as local, state and federal law enforcement agencies and consumer reporting agencies
 - iii) Documents presented are suspect, for example documentation appears to be a copy or may appear altered.

b) Procedures to discover Red Flag sources

- i) Request picture identification, separate from an ATC student id card, to complete an ATC deferred tuition payment plan application. Non picture identification must be confirmed for validity by contacting the source producing the identification. Similarly request a picture id to support employee identification, when credit reports are reviewed, in the hiring process. Prior to hiring two forms of identification are required. .
- ii) The Bursar's and Human Resource offices review identity theft notifications sent to ATC by law enforcement and/or consumer report agencies.

2) Appropriate Responses to Red Flags

- a) Notify supervisor, Bursar, or Human Resources Director
- b) Bursar, Supervisors or Directors may refuse to establish deferred tuition payment plans for individuals providing suspicious documents or unable to provide any verifiable documentation
- c) Bursar may cancel an existing deferred tuition payment plan
- d) Supervisors, Bursar or Directors may notify law enforcement agencies
- e) Bursar may determine not to attempt collection actions, pending resolution of identity
- f) The Bursar's office may investigate College historical records for unusual deferred tuition payment plan activity.
- g) Human Resource supervisor may delay or halt the hiring process.
- h) Supervisor, Bursar or Director may determine no further response is necessary

3) Reports

Annually a report summarizing material matters relating to the effectiveness of identifying and responding to Red Flags will be prepared by the Assistant Director of Financial Accounting, or appropriate designee, and forwarded to the VP of Administrative Services.

Policy Review and Revisions		
Date Completed	Reviewed/Revised By	Future Review Date