



XAVIER UNIVERSITY

Red Flags Policy

Effective: September 25, 2009

Last Updated: September 17, 2009

Last Reviewed: November 6, 2018

Responsible University Office: Bursar's Office

Responsible Executive: Executive Vice President and Chief Financial Officer

Scope: All Xavier University employees who have access to personal student information

A. REASON FOR POLICY

To adhere to a federal regulation that is administered by the Federal Trade Commission under the Red Flags Rule of the Fair and Accurate Credit Transactions Act (FACTA).

B. POLICY

The Red Flags Rule was designed to detect, prevent, and mitigate identity theft. The policy addresses four key elements as stipulated in the regulations:

- 1) Identification of relevant Red Flags
- 2) Detection of these Red Flags
- 3) Appropriate response to Red Flag detection
- 4) Periodic updates to the policy

C. DEFINITIONS

None

D. PROCEDURES

Xavier's program involves:

- 1) Identifying departments affected by the Red Flags regulation
- 2) Training the employees of those departments on the Red Flags regulation
- 3) Requiring the managers of those departments to create a policy and outline procedures on how they will detect, prevent, and mitigate identity theft
- 4) Having the managers send their policy and procedures to HR for accountability
- 5) Having HR send copies of the policies and procedures to the Red Flags Compliance Officer