



## **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