APPROVE PLAN FOR FEDERAL TRADE COMMISSION “RED FLAG RULES”
IDENTITY THEFT PREVENTION PROGRAM


Funding: No New Funding Required

The University of Illinois administers a number of debit and billing accounts that fall under the purview of the Federal Trade Commission “Red Flag Rules,” comprising FTC 16 CFR 681.1-3. Creditors holding such covered accounts are required to develop and implement a written identity theft prevention program. The proposed University of Illinois plan for such a program follows.

Under the direction of the Vice President/Chief Financial Officer and Comptroller (VP/CFO), a Red Flag Steering Committee will be formed no later than May 1, 2009, and will comprise representatives from University Treasury Operations and University Student Financial Services and Cashiering Operations. The Steering Committee will annually identify University units that administer covered accounts, customer addresses, and other personally identifying data covered by the “Red Flag Rules.”

The University of Illinois Identity Theft Prevention plan will be established via Board of Trustees approval of this document. Responsibility for the Program will be
assumed by the VP/CFO, who will administer the Program with assistance from the Red
Flag Steering Committee.

Each year, the Red Flag Steering Committee will survey the University
units that administer covered accounts, customer addresses, and other personally
identifying data. An annual report on the program will be prepared for the VP/CFO.

The survey will require units to describe their:

- Risk assessment activities as required by the FTC.
- Compliance with the elements of the program defined by
  the FTC.
- Identity theft prevention measures.

Units handling covered accounts, customer addresses, and other personally
identifying data will be responsible for timely remediation of any areas of
noncompliance. Units will also be responsible for appropriate training of staff and for
compliance oversight of any service provider arrangements.

The Board action recommended in this item complies in all material
respects with applicable State and federal laws, University of Illinois Statutes,
The General Rules Concerning University Organization and Procedure, and Board of
Trustees policies and directives.

The Vice President/Chief Financial Officer and Comptroller recommends
approval.

The President of the University concurs.