

Approved by the Board of Trustees
March 11, 2009

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

Action: Approve Plan to Establish a Written Identity Theft Prevention Program to Comply With Federal Trade Commission “Red Flag Rules” (16 CFR 681.1-3)

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.