



UNIVERSITY
of ALASKA

Many Traditions One Alaska



UA Identity Theft Prevention Program— Records & Information Management

February , 2019

What is Identity Theft?

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The theft or misuse of personal identifying information in order to gain something of value or facilitate other criminal activity

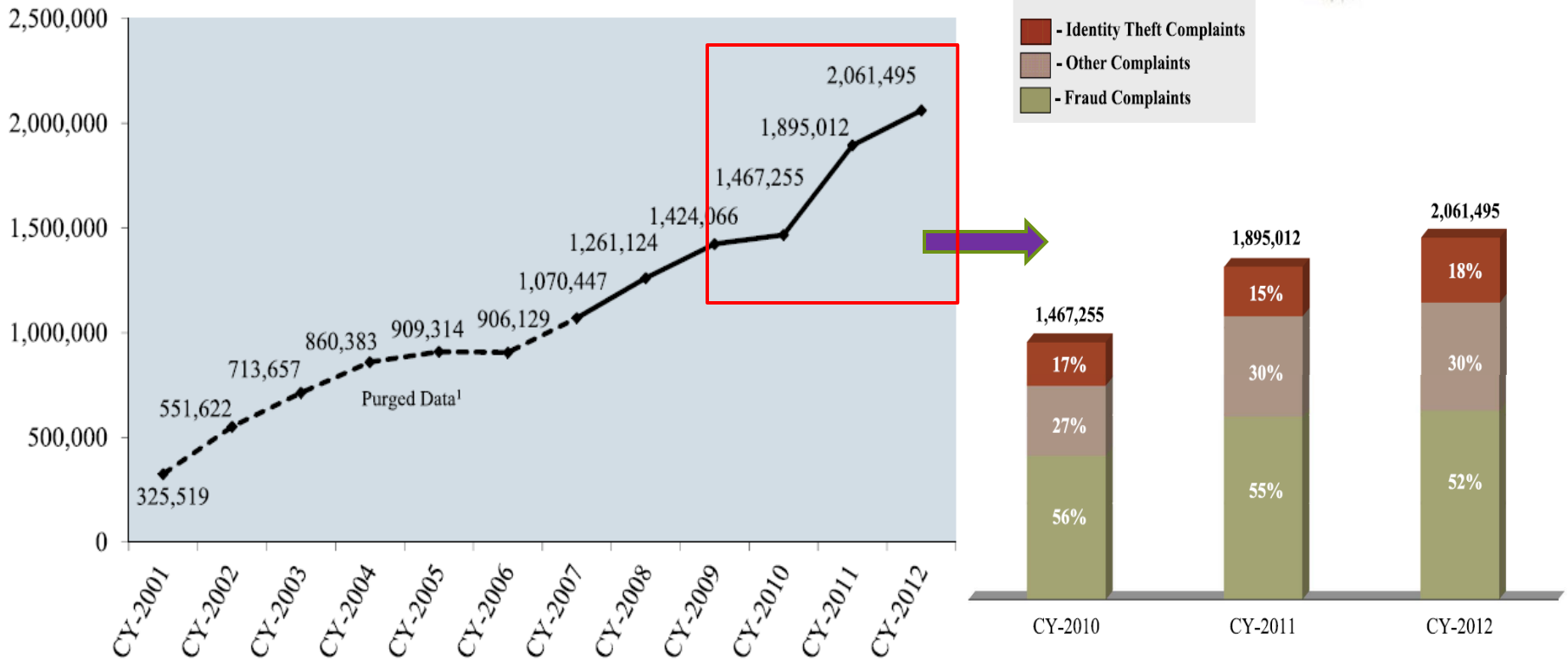
Alaska State Statute § 45.48 – Personal Information Protection Act

to obtain, possess, transfer, or use a person's "identifying information" with the intent to harm the person.



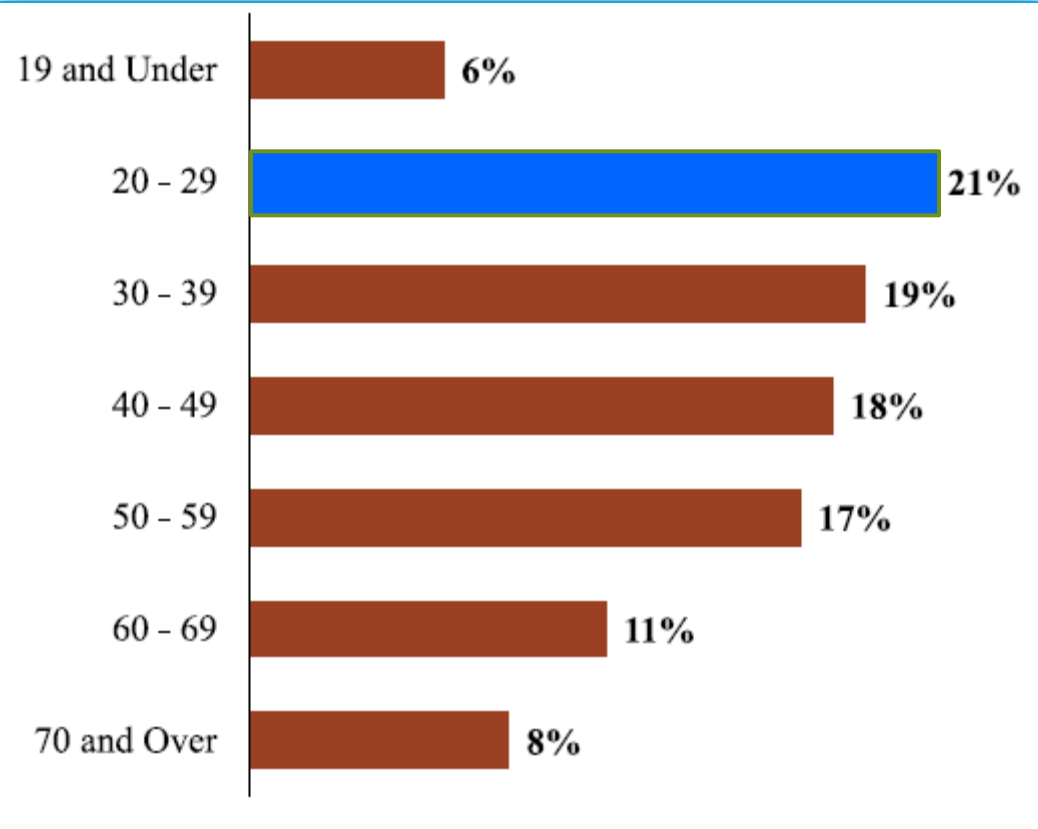
Identity Theft Complaints

Source: Federal Trade Commission, February 2013 -Consumer Sentinel Network



Maximum ID Theft Victims: Age 20-29

Source: Federal Trade Commission, February 2013 -Consumer Sentinel Network



- Maximum number of victims belong to Age 20-29 years
- 70% of the victims are students or in early stages of careers
- Universities /Colleges have higher responsibility and need to be cognizant
- Records retention schedule and information governance in compliance with the regulations



Identity Theft – Complaint Radar

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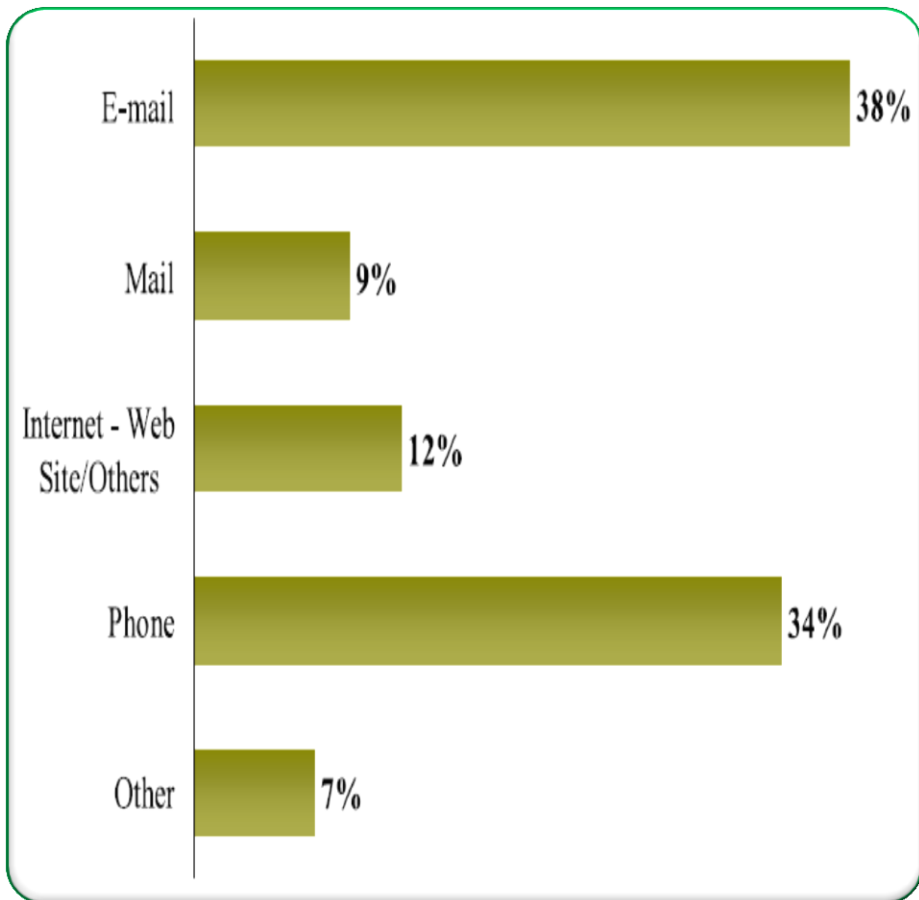
Most of the identity theft complaints in Alaska are reported in Anchorage and Fairbanks

ID Theft Contact and Payment (2012)

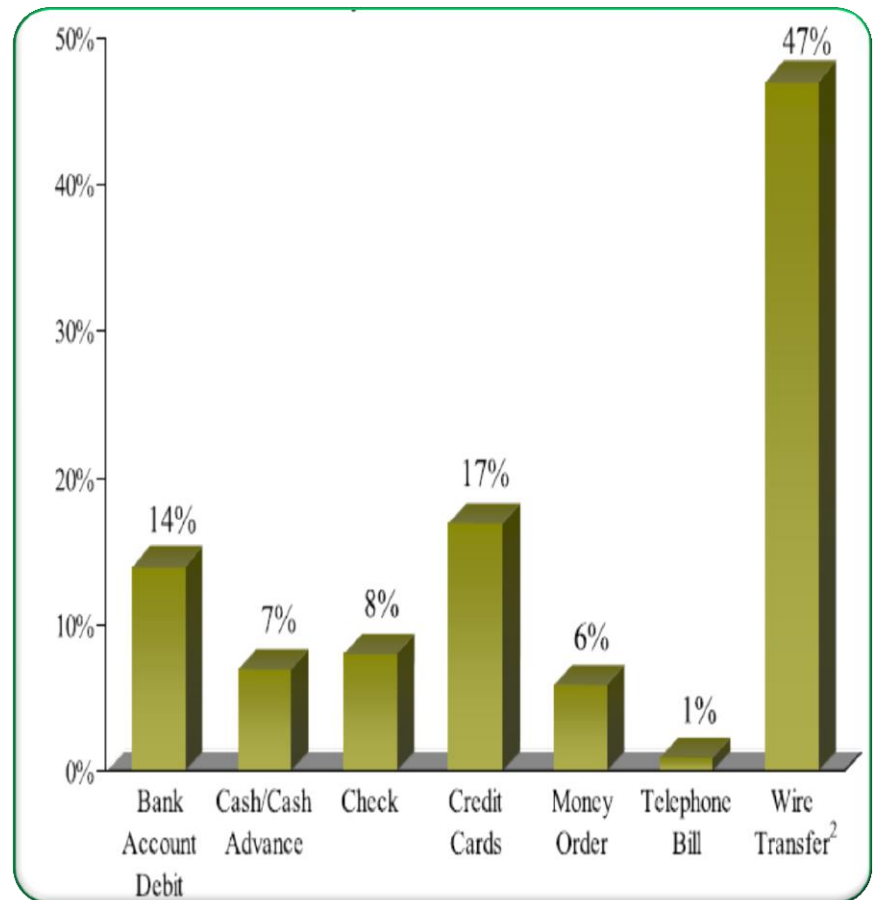
Source: Federal Trade Commission, February 2013 -Consumer Sentinel Network



Fraud Contact Method



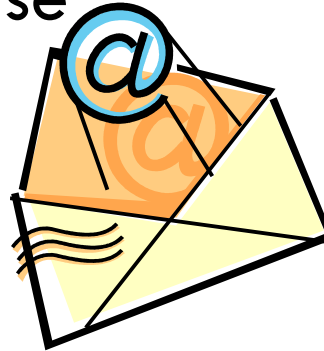
Fraud Victim Payment Method



How is information stolen?

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- ❑ Scams/fraud
- ❑ Trash diving
- ❑ Lost/stolen wallet/purse
- ❑ Mail theft
- ❑ Burglary
- ❑ Skimming
- ❑ Computer hacking
- ❑ Data breach





Identity Theft Information

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- More than 10 million Americans are victims of identity theft each year
- The total financial losses due to identity theft are estimated to be about \$200 billion every year
- The FTC received 369,132 complaints of ID theft in 2012, 18% of total complaints
- When ID thieves opened new accounts victims spent an average of \$1,865
- Victims spent an average of \$535-\$2,350 in 2012 for damage to existing accounts





RED FLAG RULES



Fighting Fraud at the University of Alaska by Protecting Student Personally Identifiable Information (PII)

Protecting Student Information requires Compliance with:

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- ❑ FERPA
- ❑ RED FLAG Rules -UA Identity Theft Prevention Program: approved by Board of Regents in 2009
- ❑ PCI
- ❑ Gramm-Leach-Bliley Act
- ❑ HIPAA
- ❑ Privacy Act of 1974
- ❑ Alaska Personal Information Protection Act AS 45.48
- ❑ Records Management: Security Breach Involving Personal Information R.05.08.023

Federal Trade Commission Fair & Accurate Credit Transaction Act RED Flag Rules

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- Congress enacted the FTC FACTA of 2003 to help combat identity theft
- The final rules and guidelines became effective in 2009
- Section 114 of FACTA contains the Red Flag Rules that required UA to develop & implement a written Identity Theft Prevention Program
- The Rule supplements existing legislation aimed at preventing identity theft
- Applies to institutions and creditors with covered accounts
- Picks on where data security leaves off

Overview of the Red Flags Rule

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□ What Are Red Flags?

□ **Definition**

activity that could indicate a risk of identity theft

□ **Purpose**

to detect and stop identity thieves

□ **Responsibilities**

protect against unauthorized access of personal identifiable information

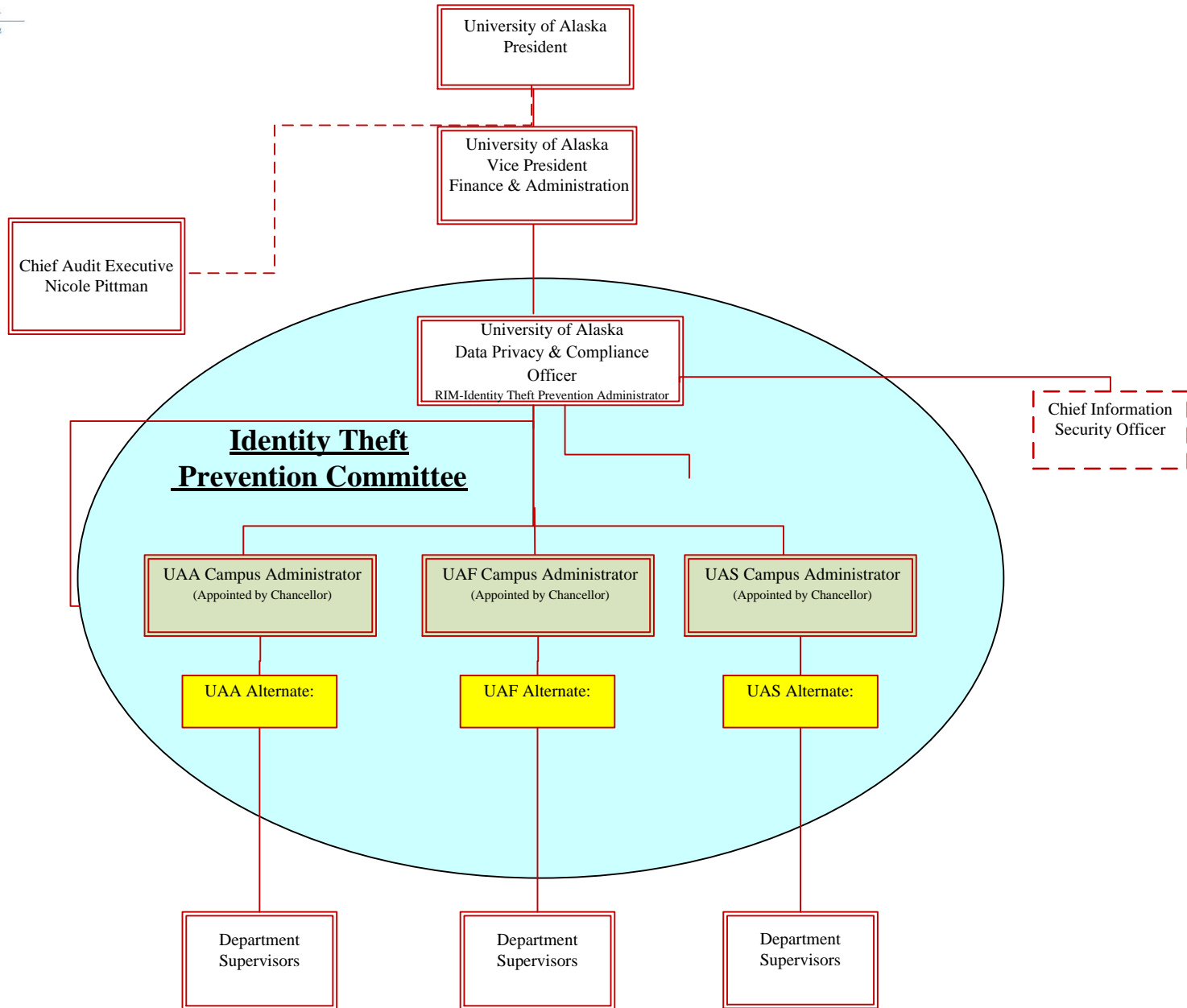
UA Identity Theft Prevention Program

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- ❑ Program approved June 5, 2009 by the Board of Regents
- ❑ Consistent with the Board of Regents Policy P.05.02.90 on financial fraud, waste and abuse
- ❑ Developed pursuant to the Federal Trade Commission's (FTC) "Red Flags" Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act.
- ❑ Adds to compliance regulations from Dept. of Education
- ❑ Distinct from data security requirements
- ❑ Alaska State- Statute 45-48: Personal Information Protection Act



Identity Theft Prevention Committee





UA Identity Theft Prevention Program

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- Identify Red Flags
- Detect Red Flags
- Prevention & Mitigate Identity Theft
- Respond



Red Flags & Current Security Protocol

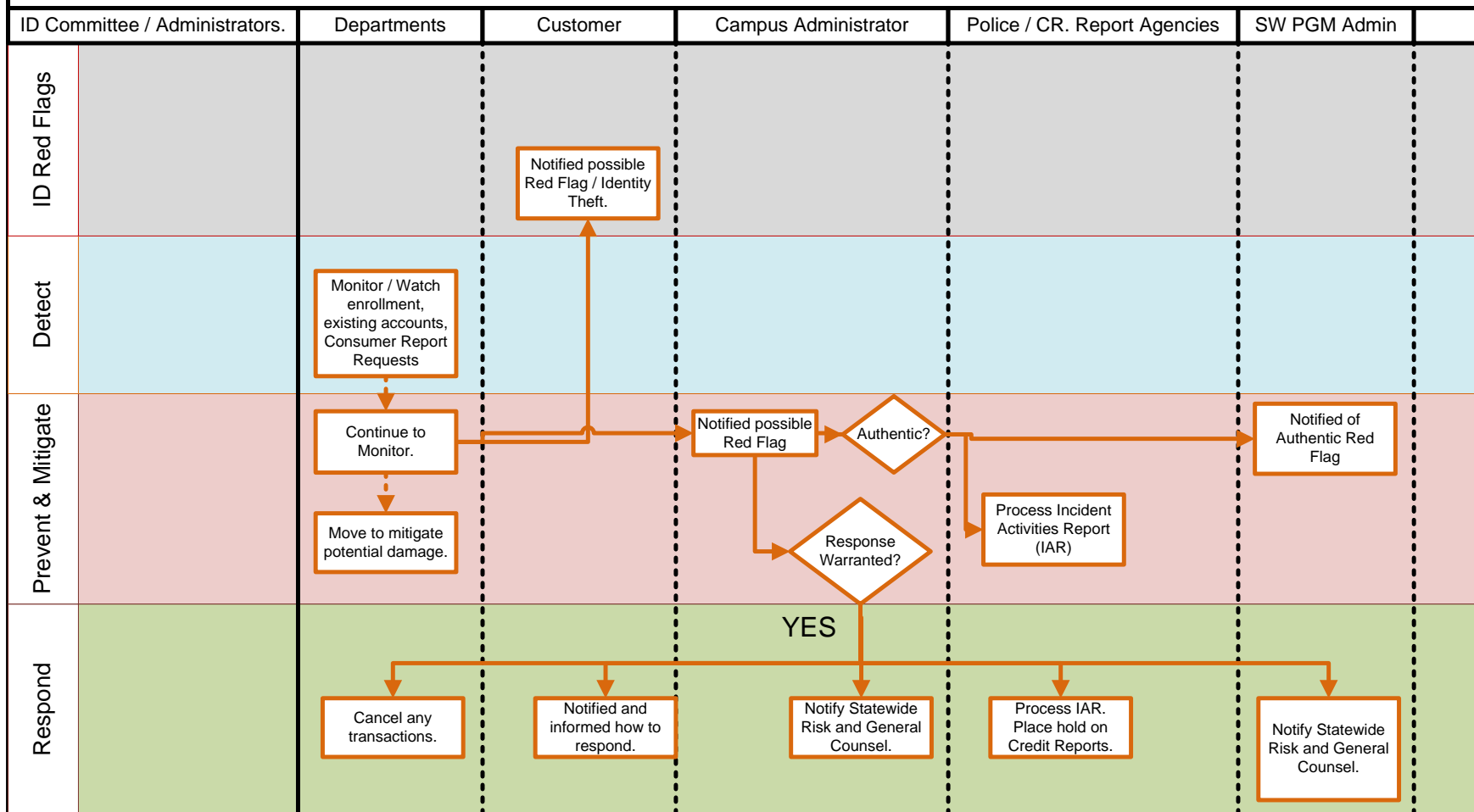
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- ❑ UA maintains protocols and procedures to address privacy of student and employee records & information, applying state and federal privacy laws
- ❑ Data security also plays an essential role in keeping people's information protected
- ❑ Red Flag Rule picks up where data security leaves off, by working to prevent identity theft by ensuring institution has appropriate practices and protocol to identify risks, procedures to address those risks and prevent future risks.



UA Identity Theft Prevention Plan

Identity Theft Prevention Workflow





Sample – UA Incident Activity Report

Red Flag Event / Suspicious Activity:				
Campus(es) involved:				
Systems compromised (if any):				
Date of Event(s):				
<u>Employee reporting the event</u>	<u>Date:</u>	<u>Telephone Number:</u>	<u>Email:</u>	<u>Location / Job Title:</u>
<u>Campus / Program Administrator recording IAR:</u>	<u>Date:</u>	<u>Telephone Number:</u>	<u>Email:</u>	<u>Location:</u>
Number of individual(s) potentially affected:				
Has the suspicious activity had a material impact on, or otherwise affected the financial soundness of University of Alaska or one of its campuses? Yes or No				
Has Law Enforcement been contacted?				
<u>Agency name:</u>				
<u>Name of person(s) contacted at Law Enforcement Agency(ies):</u>		<u>Phone:</u>	<u>Date Contacted:</u>	
<u>Individuals affected</u>				
<u>Name (Last, First)</u>				
<u>Address:</u>		<u>City:</u>	<u>State:</u>	<u>Zip</u>
<u>ID (30,xxx,xxx):</u>		<u>SSN (when necessary):</u>		
<u>Email:</u>		<u>Phone:</u>	<u>Cell:</u>	



Identity Theft Prevention & Red Flag Rule Implementation at UA

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- Identity Theft Prevention Committee annually reviews the program.
 - Will reflect on lessons learned.
 - Will maintain an awareness of changes in identity theft methods, detection and prevention methods
 - Oversee training



Identity Theft Prevention - Training

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- All University personnel shall be aware of the Identity Theft Prevention Program.
- Individuals working with Covered Accounts receive annual training.
- Individuals identified by a University Identity Theft Program Committee member shall undergo training on a annual basis.
- Training available via myUA

University of Alaska – Identity Theft Prevention Program Guidelines

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More details can be found in

<https://www.alaska.edu/records/id-theft/>

University of Alaska

Identity Theft Prevention Program

Effective beginning October 31, 2009

www.alaska.edu/records

References

- University of Alaska Identity Theft Prevention Program website:
<http://www.alaska.edu/records/id-theft/>
- FTC Red Flags website: <http://www.ftc.gov/redflagsrule>
- FTC full text of the Red Flag rules:
<http://www.ftc.gov/os/fedreg/2007/november/071109redflags.pdf>
- FTC Frequently Asked Red Flag Questions :
<http://www.ftc.gov/os/2009/06/090611redflagsfaq.pdf>
- University of Florida Privacy Office:
<http://privacy.health.ufl.edu/RedFlag/>
- 26 Red Flag Triggers:
http://www.bankrate.com/brm/news/Financial_Literacy/identity_theft/red_flags_a1.asp?caret=92g