



RED FLAGS RULES POLICY – IDENTITY THEFT PREVENTION PROGRAM

Scope: Residential Life

Issued : June 1, 2012

Revised: July 1, 2013

I. Purpose

The Department of Residential Life (RL) understands the importance of protecting customer data as well as preventing, detecting, and mitigating the effects of identity theft. When translating our understanding into action, our office used many of the University's policy statements (PS) and System memoranda (PM) as a basis for the procedures we implemented. In particular, we incorporated concepts from the computer and data security policy statements (PS 06.05, PS 06.10, PS 06.15, PS 06.20, and PS 06.25), the student privacy statement (PS 10.55), the social security number statement (PS 01.105), and the System information security plan (PM 36).

II. Policy

Specific procedures used by RL for protecting sensitive customer data are as follows:

Entrance doors are on electronic card access system and are locked electronically from 4:30 p.m. to 8:00 a.m. Monday through Friday and from 4:30 p.m. Friday to 8:00 a.m. Monday.

Office doors are manually locked and any file cabinets after business hours and if away from office for extended period of time during business hours.

Store negotiable financial instruments in fire safes and lock all safes each evening before exiting.

Shred office documents being discarded which contain student LSU ID numbers or any other student identifying number(s).

Lock unattended computers such that an ID and password is required to reactivate the computer.

Avoid the use of Social Security numbers.

Risk Assessment:

The risk of identity theft for accounts is greatest with regards to refund distribution and address changes. Though there are potential risks in these areas, RL has procedures in place which address and reduce these risks of identity theft. Following is a listing of red flags which could indicate identity theft for each of these areas as well as the steps our office follows to detect, prevent, and/or mitigate the effects of identity theft.

Red Flags:

ID card, driver's license, or documents provided for identification appear to be forged, altered, or inauthentic

Photo or physical description on identification is not consistent with the appearance of the person presenting the identification

Other information on the identification or other personal identifying information is inconsistent with information provided by the presenter or inconsistent with existing information on file with the University

LSU ID number or social security number provided is the same as that submitted by another customer

Customer, identity theft victim, law enforcement authority, or anyone notifies RL it has opened or is maintaining a fraudulent account for a person engaged in identity theft

Procedures to Reduce Risk, Detect and/or Prevent Identity Theft:

Customers are encouraged to select Direct Deposit on the Personal Access Web Services (PAWS) account for RL refunds so that refunds are sent electronically to the bank account designated by the customer

PAWS accounts are ID and password protected

Customer's LSU Identification card or driver's license is required whenever a housing refund is processed in person.

Identification is thoroughly reviewed against the presenter's appearance and existing information on the University system as well as reviewed for authenticity

Procedures to Mitigate the Effects of Identity Theft:

Suspend account billing and/or refund activity while account is being investigated for identity theft

Gather documentation which supports the potential identity theft and report the incident/situation to the Office of Bursar Operations (OBO)

Address Changes

Address changes for former as well as current customers may be processed by RL on covered accounts. Customers may also request an update to their account address in person or by email.

Red Flags:

RL is notified that a customer is not receiving mail sent by the University

ID card, driver's license, or documents provided for identification appear to be forged, altered, or inauthentic

Photo or physical description on identification is not consistent with the appearance of the person presenting the identification

Other information on the identification or other personal identifying information is inconsistent with information provided by the presenter or inconsistent with existing information on file with the University

Procedures to Reduce Risk, Detect and/or Prevent Identity Theft:

Customers are encouraged to change their address via the Personal Access Web Services (PAWS) account

PAWS accounts are ID and password protected

Customer's LSU Identification card or driver's license is required when requesting an address change in person

Identification is thoroughly reviewed against the presenter's appearance and existing information on the University system as well as reviewed for authenticity

Address change are processed by the RL Accountant Manager 1 in the University Directory System (DIR).

Emailed address change requests are forwarded to the University Admissions Office for processing.

Procedures to Mitigate the Effects of Identity Theft:

Refuse to change the address if identity theft is suspected

Investigate account if customer responds to address change form letter indicating he/she did not request the address change processed

Suspend account billing and/or refund activity while the account is being investigated for identity theft

Gather documentation which supports the potential identity theft and report the incident/situation to the OBO

OBO will determine if Identity Theft Program Administrator needs to be informed and if law enforcement needs to be contacted