

## Red Flag

Palmer College of Chiropractic (College) safeguards the confidentiality, availability and integrity of applicable identifying information through the implementation of rules and associated processes designed to detect, prevent and mitigate identity theft. Such rules and processes include, but are not limited to:

1. Identify relevant red flags for covered accounts the college offers or maintains and incorporate those red flags into the program;
2. Detect red flags that have been incorporated into the Program;
3. Respond appropriately to any red flags that are detected to prevent and mitigate identity theft; and
4. Ensure the Program is updated periodically to reflect changes in risks to students and to the safety and soundness of the creditor from identity theft.

### SCOPE

This Red Flag policy (Policy) applies to the entire College community, which is defined as including the Davenport campus (Palmer College Foundation, d/b/a Palmer College of Chiropractic), West campus (Palmer College of Chiropractic West) and Florida campus (Palmer College Foundation, Inc., d/b/a Palmer College of Chiropractic Florida) and any other person(s), groups, or organizations affiliated with any Palmer campus.

### DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings specified below:

- > The term “**College**” refers to Palmer College of Chiropractic, including operations on the Davenport campus; Florida campus; and West campus.
- > The term “**College community**” refers to all students, faculty, staff (including administration), and any other person(s), groups, or organizations affiliated with any Palmer campus.

- > The term “**covered account**” refers to:
  1. An account that a creditor offers or maintains, primarily for personal, family or household purposes that involves or is designed to permit multiple payments or transactions. Covered accounts include utility accounts; and
  2. Any other account that the creditor offers or maintains for which there is a reasonably foreseeable risk to customers or to the safety and soundness of the creditor from identity theft, including financial, operational, compliance, reputation or litigation risks.
- > The term “**credit**” means the right granted by a creditor to a debtor to defer payment of debt or to incur debts and defer its payment or to purchase property or services and defer payment therefore.
- > The term “**creditor**” means any person who regularly extends, renews, or continues credit; any person who regularly arranges for the extension, renewal, or continuation of credit; or any assignee of an original creditor who participates in the decision to extend, renew or continue credit.
- > The term “**debtor**” means any person who owes a creditor; or any person who has the obligation of paying a debt.
- > The term “**identifying information**” is any name or number that may be used, alone or in conjunction with any other information, to identify a specific person, including: name, address, telephone number, Social Security number, date of birth, government issued driver’s license or identification number, alien registration number, government passport number, employer or taxpayer identification number, unique electronic identification number, computer’s Internet Protocol (IP) address, or routing code.
- > The term “**identity theft**” means fraud committed or attempted using the identifying information of another person without authority.
- > The term “**red flag**” means a pattern, practice or specific activity that indicates the possible existence of identity theft.

## **ADMINISTRATIVE RULES**

### ***Identity Theft Prevention Program***

#### **1. PERSONNEL MANAGING STUDENT OR PATIENT FINANCIAL RECORDS SHOULD LOOK FOR:**

- a) Inconsistencies in the information the consumer gives you; date of birth differs from SSA issuance tables.
- b) An address, phone number, or other personal information that has been used on an account you know to be fraudulent.
- c) A false address, an address for a mail drop or a invalid phone number.
- d) A Social Security number used by someone else.
- e) An address or telephone number that has is used by many other people with active or past accounts.
- f) A person who omits required information on an application and does not respond to notices that the application/transaction is incomplete.

#### **2. SIGNS OF SUSPICIOUS ACCOUNT ACTIVITY:**

- a) Soon after you're notified of a change of address, you're asked to add users to the account.
- b) Mail that is sent to the consumer is returned repeatedly as undeliverable although transactions continue to be conducted on the account.
- c) You receive information that the customer is not receiving their account statements in the mail.
- d) You receive information about unauthorized charges to the account.

#### **3. DETECTING RED FLAGS:**

- a) New accounts: Verify the identity of the person who is opening a new account. Reasonable procedures may include getting a name, address, and identification number and, for in-person verification, checking a current government issued

identification card, such as a driver's license or passport.

- b) Existing accounts: Include reasonable procedures to authenticate customers (confirming that the person you're dealing with really is your customer), monitor transactions and verify the validity of change-of-address requests.

#### **4. PREVENTING OR MITIGATING IDENTITY THEFT**

- a) Monitor a covered account for evidence of theft.
- b) Determine if a response is warranted under the particular circumstance and the extent of that response.
  - i. Consider contacting a consumer if you suspect illegal activity.
  - ii. If there has been suspicious activity, consider closing the account and opening a new one.
  - iii. Consider notifying law enforcement

#### ***Oversight of the Program***

Responsibility for developing, implementing and updating this Program lies with the Vice Chancellor for Administration and the Senior Director of Financial Affairs. The Senior Director of Financial Affairs will be responsible for the Program administration, for ensuring appropriate training of College employees on the Program, for reviewing any employee reports regarding the detection of red flags and the steps for preventing and mitigating identity theft, determining which steps of prevention and mitigation should be taken in particular circumstances and considering periodic changes to the Program.

#### ***Updating the Program***

This Program will be periodically reviewed and updated to reflect changes in risks to students and patients and the soundness of the College from identity theft. Annually, the Senior Director of Financial Affairs will consider the College's experiences with identity theft, changes in identity theft methods, changes in identity theft detection and prevention methods, changes in types of accounts the College maintains and changes in the College's business arrangements with other entities. After considering these factors, the Senior Director of Financial Affairs will determine whether changes to the Program, including the listing of red flags, are warranted. If warranted, the Director of Senior Director of Financial Affairs will update the Program.

### ***Employee Training***

College employees who are responsible for implementing the Program shall be trained either by or under the direction of the Senior Director of Financial Affairs in the detection of red flags, and the responsive steps to be taken when a red flag is detected.

### ***Oversight of Service Provider Arrangements***

The College shall take steps to ensure that the activity of a service provider is conducted in accordance with reasonable policies and procedures designed to detect, prevent and mitigate the risk of identity theft whenever the College engages a service provider to perform an activity in connection with one or more covered accounts.

## **STANDARD INSTITUTIONAL POLICY PROVISIONS**

Institutional policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees and students to know and comply with these standards.

- > [Standard Provisions Applicable to All Institutional Policies](#)

## **Additional Information**

### **ASSOCIATED POLICIES, PROCESSES AND/OR PROCEDURES**

This Policy is supplemented below. It is the responsibility of all employees and students to know and comply with policies and procedures as supplemented.

#### **POLICIES**

- > N/A

#### **PROCESSES AND/OR PROCEDURES**

- > N/A

#### **FORMS/INSTRUCTIONS**

- > [Red Flag Reporting Form](#)

## OTHER RELATED INFORMATION

> N/A

## CONTACTS

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## HISTORY

Last Revised: ..... March 14, 2016

Adopted: ..... October 31, 2009

Last Administrative Review: ..... November 4, 2009

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