The College is required to provide for the identification, detection, and response to patterns, practices, or specific activities ("Red Flags") that could indicate identity theft of students when the College serves as a creditor in relation to its students. When applicable, the Superintendent/President or designee is directed to develop procedures to implement an Identity Theft Prevention Program (ITPP) to control reasonably foreseeable risks to students from identity theft.

Reference:
15 U.S. Code Section 1681m(e);
Fair and Accurate Credit Transactions Act (FACT Act or FACTA)