

Identity Theft & Red Flag Compliance

Moran Technology Consulting is a highly experienced and proven provider of consulting services to the education, public sector and financial services industries. We are intimately familiar with the growing security and compliance challenges facing higher education institutions.

The Identity Theft Red Flags Rule, issued November 9, 2007 by the Federal Trade Commission, went into effect on January 1, 2008. Compliance is enforced as of January 1, 2011. The Red Flags Rule requires financial institutions and creditors to develop and implement a written identity theft prevention program to detect, prevent, and respond to patterns, practices, or specific activities that may indicate identity theft. The Red Flags Rule applies to institutions participating in the Federal Perkins Loan Program and may also apply to other programs that issue credit to students.

Is your institution considered a "creditor" by the FTC?

Which accounts are considered "covered accounts" for extending credit?

What risks exist for identity theft on these accounts?

What "red flags" warn of possible identity theft?

What controls and procedures are necessary to recognize these "red flags"?

What are the appropriate responses to possible identity theft?

What is the appropriate level of program oversight?

Has the required institutional authority approved the plan?

Our Red Flag Compliance Services

- Identity Theft Red Flag Compliance Planning
 - Assess applicability of the regulations
 - Identify "covered accounts"
 - Identify transactions to be controlled
 - Define controls and responses to red flags
 - Review with internal audit and legal staffs
 - Train staff
 - Establish test plan and cycle
 - Conduct periodic control testing, management review, and update
- Identity Theft Red Flag Controls Testing
- Periodic Management Review and Updates

Benefits

- Effective controls to detect and prevent student identity theft
- Defined responses for identity theft warning signs
- Reduced legal liability
- Compliance with the FTC Red Flags Rule