

**LSU Paul M. Hebert Law Center  
Red Flags Rule Policy  
Identity Theft Prevention Program  
Adopted April 30, 2009**

The LSU Paul M. Hebert Law Center ("Law Center") developed this Identity Theft Prevention Program ("Program") pursuant to the Federal Trade Commission's ("FTC") Red Flags Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003. To the extent consistent with existing Law Center policies, the Law Center incorporated concepts from policy statements of the LSU Agricultural and Mechanical College ("LSU A&M") to implement this policy including computer and data security policy statements (PS 06.05, PS 06.10, PS 06.20, and PS 06.25), the student privacy statement (PS-30LC), the social security number statement (PS 01.105), and the System information security plan (PM 36).

The Law Center understands the importance of protecting student/customer data as well as preventing, detecting, and mitigating the effects of identity theft. Moreover, the LSU A&M Office of Bursar Operations performs the bursar function on behalf of the Law Center. As such, all bursar function activities relating to student accounts for the Law Center that may be subject to Identify Theft Prevention Program are covered under the Identify Theft Prevention Program as established and adopted by the LSU A&M Office of Bursar Operations.

Specific procedures used by the Law Center for protecting sensitive customer data are as follows:

- The Law Center is locked each evening by LSU Police at a time set by the Law Center Administration and reopened daily by LSU Law Center Building Operations at time set by the Law Center Administration.
- Documents which contain student LSU ID numbers or any other student identifying number(s) or personal information are shredded upon disposal.
- Computers which are unattended in open areas are locked when unattended. A logon id and password are required to reactivate the computer.
- Social Security numbers are used only in limited, appropriate instances. In instances in which social security numbers are used, access is restricted to appropriate personnel.
- All paper files which contain personal student data that are not being used by authorized personnel are secured in locked cabinets. Only authorized personnel have access to locked cabinets.

- Electronic files are restricted to authorized personnel.
- Employees are instructed to lock office doors prior to departure.

***Risk Assessment:***

The Law Center reviewed its processes to determine which processes contain the risk of identity theft along with the potential impact of each identified risk.

Because bursar functions are not performed by the Law Center and based on the processes in place, the risk of identity theft appears to be low. However, a listing of possible red flags that which could indicate identity theft and the steps the Law Center follows to detect, prevent, and/or mitigate the effects of identity theft is provided below.

***Walk-in Students/Customers:***

Students (prospective, enrolled and former) and other customers visiting the Office of Admissions or the Office of the Registrar report to one counter. Though most of the student applications and requests are received electronically and fees, if any are paid online, students may complete and submit a paper application either in person or other means or request documentation from the Law Center. In such circumstances, a check or money order is typically required. Payments received through the mail or from walk-in customers are held in a non-visible location and deposited to the Office of the Bursar frequently. No refunds are made directly to a student. If a refund is authorized, students must obtain a refund through the LSU A&M Office of Bursar Operations.

***Red Flags:***

Students frequently provide their ID number or social security numbers to employees to provide a means of determining the student's status, for library services, request reimbursement, or participate in student employment. Many of these interactions occur at a shared front counter in the Office of Admissions and the Office of the Registrar. Many students know their social security number but do not know their ID number. As a result, many students verbally provide social security numbers.

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

Staff is instructed to require a student's ID card, driver's license, or other means of identification before providing personal data to walk-in customers.

Identification cards are checked to determine if whether the card appears to be forged, altered, or inauthentic.

Photo or physical description on the identification card is examined to ensure that card is not inconsistent with the appearance of the person presenting the identification.

Personal identifying information is checked to determine whether it is inconsistent with other personal identifying information provided by the customer.

A Student ID number or social security number is checked to ensure that the number provided is not the same as the number of another customer.

Staff is instructed to be otherwise cognizant of other inconsistent information.

***Procedures to Mitigate the Effects of Identity Theft:***

Encourage customers submit applications or requests online.

Ensure computer virus protection is up-to-date.

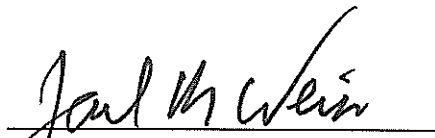
Refuse to provide personal information to anyone who cannot identify themselves.

Refuse to provide personal information to anyone with an identification card that appears to be forged, altered or inauthentic.

Refuse to provide personal information to anyone with a photo or physical description on an identification card that is inconsistent with the appearance of the person presenting the identification.

Refuse to provide personal information to anyone that does not provide a Student ID card or social security number

Law Center employees and student workers have been informed of the Red Flags Rule Identity Theft Prevention Program and are trained on the procedures established by the Law Center to protect customer data as well as preventing, detecting, and mitigating the effects of identity theft.



Jack M. Weiss  
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4/29/09  
Date