Red Flag Identity Theft Prevention Program – CPE Webinar April 2026

Administrative Policy Statement 7010 Red Flag Identity Theft Prevention Program is designed to reduce the risk of identity theft through detection, prevention, and mitigation of patterns and practices that could be indicative of potential theft (red flag), involving the university, its students, employees, and other customers. **The program requires the university to perform certain procedures to protect personally identifiable information (PII) associated with covered financial accounts.**

Examples of PII include:

- Social security number
- Passport number
- Driver's license number
- Taxpayer identification number
- Patient identification number
- Financial account number
- Credit card number
- Personal address, email address, IP address
- Phone/cell number
- Biometrics, including photographs
- Date of birth, location of birth

A covered financial account, with respect to identity theft, includes:

- Any financial account the university opens or maintains for students, employees, or other customers that involves multiple payments or transactions, including deferred payments.
- Any other financial account the university opens or maintains for students, employees, or other customers in which there is a reasonably foreseeable risk to the safety or soundness of the university from identity theft, including financial, operational, compliance, reputation, or litigation risks.
- *At CU, this includes students with a payment plan for tuition or student loans (managed by campus Bursar and Financial Aid offices) and employees with a faculty housing loan (managed by Treasury)*.

Reasonable procedures include:

1. Ensure the security of the data collected and maintained in covered accounts
2. Establish a process to periodically review the security of covered financial accounts
3. Maintain a list of possible red flags, including red flags that have been previously detected in University covered financial accounts
4. Respond appropriately to any detected red flag to prevent and mitigate identity theft
5. Ensure the program is updated periodically

Resources

Office of Policy and Efficiency Administrative Policy Statements (APS):
APS 7010 Red Flag Identity Theft Prevention Program
APS 2006 Retention of University Records
APS 6005 IT Security Program
APS 6010 Data Governance
CU System Training in the Campus Portal:
Percipio (Skillsoft) course: CU Identity Theft Prevention Program