



APS JUSTIFICATION

Policy Title: Collection of Personal Data from Students and Customers

APS Number: 7003

APS Functional Area: **RISK MGMT/PUBLIC SAFETY**

Date Submitted:	January 15, 2025
Proposed Action:	Review
Brief Description:	Sets forth requirements for the collection of personal data from students and other customers of the University, and for detecting warning signs associated with identity theft.
Desired Effective Date:	TBD
Responsible University Officer:	Office of Vice President for Finance
Responsible Office:	Office of University Controller
Policy Contact:	Office of University Controller
Last Reviewed/Updated:	July 1, 2009
Applies to:	All campuses

Reason for Policy: To set forth requirements for the collection of personal data from students and steps to be followed by organizational units when conducting business with students.

I. REASON FOR PROPOSED ACTION

A portion of this policy is being replaced by the new *APS7010- Red Flag Identity Theft Prevention Program* which becomes the University of Colorado's Red Flag Identity Theft Prevention program and sets forth requirements for the collection of personal data to help protect members of the University of Colorado community from damages related to the fraudulent activity of identity theft.

II. STAKEHOLDER ENGAGEMENT IN THE POLICY REVIEW

UIS/Information Security, Legal

III. LEGAL REVIEW

- A. Do you think legal review would be required for these proposed changes? **Yes.**
 - 1. If no, please explain.
 - 2. If yes, what is your plan to get the legal review? **Legal will be part of the review team.**
- B. Date legal review completed:
- C. Person completing legal review: **Julie Steeler**

- IV. **FISCAL REVIEW** Are there any financial (human resources, technology, operations, training, etc.) or other resource impacts of implementing this policy (e.g., cost savings, start-up costs, additional time for faculty or staff, new systems, or software)? **No.** If yes, please explain: