Amherst College
IDENTITY THEFT PROGRAM ANNUAL UPDATE

Summary

Amherst College (the “College”) has developed and adopted an identity theft program (the “Program”) pursuant to the Federal Trade Commission’s Red Flags Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003.

The Program is designed to detect, prevent and mitigate identity theft in connection with the opening of a covered account or an existing covered account and to provide for continued administration of the Program. Among other reasons, the Program identifies procedures to:

1. Identify relevant red flags for covered accounts it offers or maintains and incorporate those red flags into the Program;
2. Detect red flags that have been incorporated into the Program;
3. Respond appropriately to any red flag that has been detected to prevent and mitigate identity theft.

Controls/Procedures

As part on the continuous training on the Program, the following are a critical part of the College’s Program:

All refunds on student accounts (including one-card balances) that are in an overpaid position must be initiated by the student owning the account. The request is initiated either in person, or in writing from the student’s Amherst College e-mail account. Phone requests will not be honored due to the difficulty in accessing the individual’s identity.

Requests made in person must be made at the Student Accounts Department within the Controller’s Office during standard operating hours. The student must present their valid Amherst College identification.

Refunds from a student’s account are paid through a third party entity (Finexio). Payment is made via ACH or “echeck”, based upon the student’s payment election with Finexio and made payable to the student’s legal name in Workday. A student may request a specific address that is different from the system data. The identification of a mailing address for the payment must be done through the student’s Amherst email account and directly to Finexio. This process will not create a permanent change with the College.

Students must make any change of legal name or permanent address within Workday. A change in legal name requires the appropriate legal document, such as a marriage certificate or court order. A change in address is made by the student within Workday. If help is requested, it must come from the student’s Amherst email account.

A change in name or address for an alumnus with loan balances is made through the Controller’s Office. Each alumnus must provide their requests in writing and identify their personal loan number for verification.
Red Flags

The following red flags are potential indicators of fraud. Any time a red flag, or a situation closely resembling a red flag is apparent, it should be critically assessed and, if warranted by the circumstances, investigated.

1. Documents provided for identification appear to have been altered or forged;
2. The photograph or physical description on the identification is not consistent with the appearance of the student presenting the identification;
3. A request made from a non-College issued e-mail account;
4. A request to mail something to an address not listed on file; and
5. Notice from customers, victims of identity theft, law enforcement authorities, or other persons regarding possible identity theft in connection with covered accounts.

Response to Red Flags

The program provides appropriate responses to detect red flags to prevent and mitigate identity theft. The appropriate responses to the relevant red flags are as follows:

1. Deny access to the covered account until other information is available to eliminate the Red Flag;
2. Contact the student or employee;
3. Change any passwords, security codes or other security devices that permit access to a covered account;
4. Notify law enforcement; or
5. Determine no response is warranted under the particular circumstances.

Conclusion

It is important that College employees follow procedures designed to mitigate the risk of identity theft by following the Program noted above. For further information on the Program see the full description on HR’s webpage.