



Trusted Solutions for Higher Education

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IDENTITY THEFT PREVENTION PROGRAM

1. PURPOSE

The Gramm-Leach-Bliley Act of 1999 enacted administrative, technical and physical safeguards for consumer financial information. FAME developed, implemented and maintains a Consumer Information Security Plan to address these extensive protections.

Subsequently, the Fair and Accurate Credit Transactions (FACT) Act of 2003 was expanded to include Identity Theft Red Flags rules in 2007 which required additional protections to consumer financial information in order to specifically address the growing issue of identity theft. As such, FAME developed this Program in order to combat identity theft by:

- a) identifying relevant patterns, practices, and specific forms of activity that are red flags signaling possible identity theft,
- b) detecting red flags incorporated in this Program,
- c) responding appropriately to any red flags that are detected, and
- d) annually reviewing the Program to reflect any changes in risks from identity theft.

2. PROGRAM MANAGEMENT

The VP Technology of FAME coordinates, executes and maintains the Identity Theft Prevention Program. In addition, the General Manager provides guidance in complying with this Program. All correspondence and inquiries should be directed to the General Manager.

3. OVERSIGHT OF SERVICE PROVIDERS

FAME does business with two general categories of Service Providers; governmental agencies and private firms:

- The governmental agencies, ED, the IRS, and the USPS, must adhere to their own regulations to protect against identity theft. FAME does not need, nor would it be able, to enter into agreements with these agencies.
- The private firms either may or may not be required to have their own Identity Theft Prevention Program, and as such are required to provide an Identity Theft Prevention Program to FAME annually. If no such Program is in place, a letter from the service provider's attorney stating that the company is not legally required to have such a Program in place is required.

4. RISK ASSESSMENT

To determine the necessary scope of this Program, a risk assessment is conducted annually. As FAME does not evaluate or extend credit, and does not maintain transaction accounts for borrowers (as defined by the Federal Reserve System regulations), risk is primarily limited to the accuracy of input from FAME's clients. This assessment has determined that the risk of identity theft by the public is minimal, and as such, FAME's exposure is minimal. Since the identity theft potential is minimal, several aspects of an exhaustive Identity Theft Protection Program are not extensively detailed in our Program

5. IDENTIFICATION AND DETECTION OF RED FLAGS

The majority of the red flags identified by the Federal Trade Commission (FTC) do not apply to FAME accounts or activities.

6. PERIODIC UPDATE OF PROGRAM

The General Manager reviews the Program annually to determine if any changes are needed due to:

- a) experiences in identity theft within the past year,
- b) new methods of identity theft,
- c) new methods of detecting or preventing identity theft, and
- d) changes in the scope of FAME's activities.

A new risk assessment is performed upon identification of any such changes. The Program is updated accordingly.