

COLLEGE OF SOUTHERN IDAHO BOARD OF TRUSTEES



April 20, 2009

EXECUTIVE SESSION 5:00 p.m. Taylor Building – President's Board Room

BOARD OF TRUSTEES MEETING 6:00 p.m. Taylor Building – SUB 248

AGENDA

MINUTES – EXECUTIVE SESSION OF MARCH 23, 2009: (A) Mike Mason MINUTES – REGULAR MEETING OF MARCH 23, 2009: (A) Mike Mason TREASURER'S REPORT: (A) Mike Mason RATES SET BY DORMITORY HOUSING COMMISSION: (A) Mike Mason FY10 EMPLOYEE CONTRACTS AND COMPENSATION : (A) Mike Mason CONDENSING UNIT AND COIL UPGRADE BID FOR DESERT BUILDING : (A) Mike Mason WASHINGTON STREET RIGHT OF WAY FOR PLAT : (A) Mike Mason IDENTITY THEFT PREVENTION POLICY : (A) Mike Mason HEAD START REPORT: (I) Mike Mason CONSTRUCTION OCCUPATIONS CAREER EVENT : (I) Dr. Todd Schwarz RECOGNITION OF NEW CENTURY SCHOLAR: (I) Graydon Stanley & Tiffany Seeley-Case PRESIDENT'S REPORT: (I) President Beck OLD BUSINESS NEW BUSINESS THE COLLEGE OF SOUTHERN IDAHO COMMUNITY COLLEGE DISTRICT APRIL BOARD OF TRUSTEES MEETING APRIL 20, 2009

CALL TO ORDER: 6:15 p.m. Presiding: LeRoy Craig

Attending: Trustees: LeRoy Craig, Dr. Charles Lehrman Donna Brizee, Dr. Allan Frost and Dr. Thad Scholes

College Administration: Gerald L. Beck President John M. Mason, Vice President of Administration Dr. Jeff Fox, Executive Vice President and Chief Academic Officer Dr. Edit Szanto, Vice President of Student Services and Planning and Development Dr. Ken Campbell, Dean of Technology Dr. Todd Schwarz, Instructional Dean Dr. Cindy Bond, Instructional Dean Jeffrey M. Harmon, Dean of Finance Scott Scholes, Dean of Student Services Graydon Stanley, Dean of Students Gail Schull, Registrar Randy Dill, Physical Plant Director Curtis Eaton, Advisor to the President and Executive Director of the College of Southern Idaho Foundation

Doug Maughan, Public Information Director Kathy Deahl, Administrative Assistant to the President

CSI Employees: Tiffany Seeley-Case

Visitors: Student Body President Yesica Flores, Student Body Vice President Sonia Monreal, Michelle Baltzor, Michael Baltzor and Carolyn Baltzor

Faculty Representative: John Boling and Ryan Jund

PACE Representative: Revis Turner and Connie Lancaster

Times News: Ben Botkin

MINUTES OF THE EXECUTIVE SESSION OF MARCH 23, 2009 AND THE REGULAR SESSION OF MARCH 23, 2009 were approved on MOTION by Dr. Thad Scholes. Affirmative vote was unanimous. CSI Trustees April 20, 2009 Page 2

TREASURER'S REPORT: The Treasurer's report was approved on MOTION by Donna Brizee. Affirmative vote was unanimous.

BIDS:

1. The Board approved the low bid of Sawtooth Sheet Metal in the amount of \$32,459.00 for specified Desert Building condensing unit and coil upgrade on MOTION by Dr. Thad Scholes. Affirmative vote was unanimous.

Funding for this project is from the State of Idaho Division of Public Works through delegate project number 09-092D.

PRESIDENT'S REPORT:

1. Due to the Idaho State Legislature still being in session and our budget appropriation not being set, President Beck requested that the agenda item dealing with fiscal year 2010 employee contracts and compensation be removed from the agenda. The Board approved the request.

2. Dormitory room and meal rates for the 2009-2010 school year were approved on MOTION by Dr. Allan Frost. Affirmative vote was unanimous. These rates had previously been approved by the Dormitory Housing Commission.

3. The Board reviewed the Washington Street widening right of way requirements. This project will require the College to give up approximately 28 feet of land along Washington Street from the Northview Apartments to Cheney Road. The College is also being asked to grant a permanent easement of another 25 feet for a drainage swale.

The Board authorized Vice President of Administration Mike Mason to enter into negotiations with the City of Twin Falls for the requested property. Mr. Mason was further authorized to complete the property transaction for the property between the Northview Apartments and Cheney Road on MOTION by Donna Brizee. Affirmative vote was unanimous. CSI Trustees April 20, 2009 Page 3

4. Graydon Stanley recognized Student Body President Yesica Flores and Student Body Vice President Sonia Monreal for their achievements over the past year. He specifically mentioned their work with sustainability programs initiated throughout campus. President Beck thanked them for their assistance with tuition and fee increases and support of the administration.

Chairman Craig and the Board told Yesica Flores and Sonia Monreal that their service was appreciated and that the Board was very proud of them.

5. The Board approved the College of Southern Idaho Identity Theft Prevention Program on MOTION by Dr. Charles Lehrman. Affirmative vote was unanimous.

6. Mike Mason advised the Board that Head Start had completed its PRISM Self Assessment program. He also noted that Head Start was within its targeted budget.

7. Dr. Todd Schwarz presented a video that introduced high school students to the vocations available in the construction industry. He advised the Board that a similar event would be held in the College of Southern Idaho Expo building May 7 through May 9, 2009. Funding for the event is from the WIRED grant.

8. Graydon Stanley and Tiffany Seeley Case introduced Michelle Baltzor, the College of Southern Idaho's fourth student in four years to be named Idaho's New Century Scholar.

10. President Beck reported the following:

a. The Joint Finance Appropriations Committee's recommendation did not include funding for two new nursing positions but we were treated fairly in a difficult year.

b. President Beck attended meetings with our General Motors Corporation partner in the auto service program.

c. President Beck and Dr. John Miller met with Blaine County School Superintendent Jim Lewis who has offered to share a student educational advisor with the Blaine County Center.

d. The President is nearly complete evaluating staff that report directly to him.

CSI Trustees April 20, 2009 Page 4

e. President Beck thanked Dr. Edit Szanto for her work on the strategic plan. The plan was recently approved by the Idaho State Board of Education.

f. President Beck recently met with representatives from the University of Idaho and asked them to consider housing and scholarships for students transferring from the College of Southern Idaho to the Moscow campus.

g. The President continued work with Idaho universities in support of students completing their first two years of college at community colleges.

h. The President and administrative staff visited the Hagerman property to determine how the property could be used for educational purposes.

i. President Beck attended the Idaho State Board of Education meeting and presided over the President's Council.

j. President Beck welcomed Tracey Meyerhoeffer to the ranks of doctorate level faculty at the College of Southern Idaho.

11. Chairman Craig and the trustees expressed their appreciation to the College faculty, staff and administration for their work over these last six difficult months.

President Beck also expressed his appreciation and advised the Board that we would close out the current fiscal year within budget and look forward to better times next year.

ADJOURNMENT was declared at 7:10 p.m.

John M. Mason, Secretary Treasurer

Approved: May 18, 2009

Chairman







PRISM SELF-ASSESSMENT METHODOLOGY

PRISM was conducted February 19- April 3, 2009. 20 staff members, 9 parents on Policy Council, and one community member participated in the Self– Assessment process.

On– Site Activities

- 11 Centers plus Central Office were visited
- 11 Centers were observed for Male Involvement, Parent Area, and Parent Involvement Activities, Newsletters, and Minutes
- 123 Child Files were reviewed
- 23 Files of children with a disability were reviewed
- 123 Child Files were reviewed for Income Eligibility Process and Data
- 68 Attendance records were reviewed
- 12 Home Visits were observed
- 17 Classrooms Observed utilizing the High Scope Assessment
- 20 Meal Observations were completed
- 11 CACFP Attendance/Meal Count Assessments were completed
- 13 Bus Routes have been observed
- 11 Centers and Central Office were inspected for Health and Safety
- 10 Sanitation Checklists were completed
- 11 Medication Administration Checklists were completed
- 36 First Aid Kits were checked in centers and Central Office
- 16 Personnel Files were reviewed
- 21 Interagency Agreements
- 23 Contracts were reviewed

Interviews Conducted

- Mike Mason, Vice President of Administration, CSI
- Policy Council
- Mary Marshall, Director
- Charyl Jester, Operations Manager
- Leslie Wheeler, Fiscal Coordinator
- Lynette Brackenbury, Family Services Specialist
- Brad Eslinger, Children's Services Specialist
- Delia Villanueva, Health Coordinator
- Paul Burnett, Mental Health Consultant
- Caroline Dolezal, Nutrition Consultant
- Lisa Stewart, Human Resources Coordinator
- 11 Center Supervisors were interviewed
- 28 Head Start parents were interviewed
- 37 Classroom Staff/ Home Visitors were interviewed
- 27 Community Partners
- 2 members from each Advisory Board

PRISM WRAP-UP

Thursday April 16th at 4:00 PM in the Taylor Building room 276. We will discuss any findings/ concerns and make plans for program improvement.

HEAD START ACCOUNT # 22 January 1, 2009-December 31, 2009

MONTHLY FINANCIAL REPORT SOUTH CENTRAL HEAD START



		TOTAL	T	OTAL THIS	CA	ASH OUTLAY						8	BALANCE	PROJ	ACTUAL
CATEGORY	ŀ	APPROVED		MONTH		TO DATE	BALANCE	R	EVENUES	CO	MMITMENTS	(OF BUDGET	%	%
SALARIES	\$	2,222,002.00	\$	187,739.95	\$	568,400.53	\$ 1,653,601.47	\$	(14,668.00)			\$	1,668,269.47	24.0%	24.9%
BENEFITS	\$	1,425,684.00	\$	109,401.79	\$	327,728.16	\$ 1,097,955.84	\$	(8,418.00)			\$	1,106,373.84	24.0%	22.4%
OUT OF AREA TRAVEL	\$	3,750.00	\$	(17.00)	\$	578.94	\$ 3,171.06					\$	3,171.06	30.2%	15.4%
EQUIPMENT															
SUPPLIES															
OFFICE · CONSUMABLES	\$	13,700.00	\$	881.99	\$	3,633.63	\$ 10,066.37	\$	(77.00)	\$	146.07	\$	9,997.30	27.3%	27.0%
CENTER SUPPLIES	\$	52,020.00	\$	2,302.72	\$	9,688.03	\$ 42,331.97	\$	(318.00)	\$	6,078.51	\$	36,571.46	25.8%	29.7%
TRAINING SUPPLIES	\$	8,700.00	\$	420.80	\$	497.50	\$ 8,202.50	\$	(18.00)	\$	135.43	\$	8,085.07	20.1%	7.1%
FOOD	\$	11,200.00	\$	(1,493.05)	\$	20,203.56	\$ (9,003.56)	\$	(13,641.53)	\$	9,505.34	\$	(4,867.37)	13.8%	143.5%
CONTRACTUAL															
OTHER															
CONTRACTS	\$	49,190.00	\$	3,223.20	\$	11,153.34	\$ 38,036.66	\$	(418.00)	\$	375.00	\$	38,079.66	29.5%	22.6%
MEDICAL	\$	15,675.00	\$	135.00	\$	1,141.50	\$ 14,533.50			.\$	1,567.00	\$	12,966.50	14.8%	17.3%
DENTAL	\$	57,655.00	\$	560.00		1,001.20	\$ 56,653.80			\$	740.50	\$	55,913.30	23.2%	3.0%
CHILD TRAVEL	\$	74,785.00	\$	11,504.38	\$	28,806.27	\$ 45,978.73	\$	(935.00)	\$	3,731.73	\$	43,182.00	21.3%	42.3%
EMPLOYEE TRAVEL	\$	43,605.00		2,030.09	\$	4,315.14	\$ 39,289.86	\$	(149.00)	\$	457.28	\$	38,981.58	23.4%	10.6%
CAREER DEVELOP	\$	6,985.00	\$	520.84	\$	3,103.84	\$ 3,881.16	\$	(40.00)	\$	1,115.00	\$	2,806.16	24.7%	59.8%
PARENT TRAINING	\$	6,800.00	\$	623.80	\$	1,394.80	\$ 5,405.20	\$	(49.00)	\$	823.90	\$	4,630.30	41.9%	31.9%
SPACE	\$	54,652.00		1,411.02		10,167.64	\$ 44,484.36	\$	(230.00)	\$	1,170.76	\$	43,543.60	17.8%	20.3%
UTILITIES	\$	65,125.00	\$	8,186.31	\$	16,236.56	\$ 48,888.44	\$	(634.00)			\$	49,522.44	26.7%	24.0%
TELEPHONE	\$	37,510.00	\$	2,701.27	\$	7,136.49	\$ 30,373.51					\$	30,373.51	28.4%	19.0%
OTHER	\$	39,945.00	\$	(47.00)		17,751.25	\$ 22,193.75	\$	(265.00)	\$	265.00	\$	22,193.75	35.9%	44.4%
TOTAL DIRECT COSTS	\$	4,188,983.00	\$	330,086.11	\$	1,032,938.38	\$ 3,156,044.62	\$	(39,860.53)		\$26,111.52	\$	3,169,793.63	24.3%	24.3%
ADMIN COSTS	\$	267,382.00	\$	(286.00)	\$	45,411.00	\$ 221,971.00	\$	(885.00)	\$	20,520.00	\$	202,336.00	24.9%	24.3%
GRAND TOTAL	\$	4,456,365.00	\$	329,800.11	\$	1,078,349.38	\$ 3,378,015.62	(\$40,745.53)		\$46,631.52	\$	3,372,129.63	24.4%	and the second sec
									(1)						
IN KIND NEEDED	\$	271,058.84	_												
IN KIND GENERATED	\$	174,547.00	-				 	-							
IN KIND GENERATED	φ	177,347.00	-				 	-		-	· · · · ·				
IN KIND (SHORT)/LONG	\$	(96,511.84)													
		(2)													
(1) Reflected revenue(s) inclu															
(2) In kind sufficient to meet	req	uirement will	be	booked dur	ing	g April									

Today: J2009 ExportDate: 4/9/2009 College of Southern Idaho	1:14:34 Acct Year: (Acct Month:		rom: 00 De To: 99	ept From: 7100 Dept To: 7199	Page 33 of 33 Acct From: 3000 Acct To: 5999
Fund 71 HEADSTART	Actual	Encumbrance	Total	Budget	Remaining
Revenue: (\$1,319,688.35) Expense: \$1,309	(\$10,042.74)),645.61 Encumb	(\$2,718.00) Rev: \$0.00	(\$12,760.74) Encumb Exp.	\$4,921,600.00 : (\$2,718.00)	\$4,934,360.74 100.26% Net: (\$12,760.74)
Grand Total	(\$10,042.74)	(\$2,718.00)	(\$12,760.74)	\$4,921,600.00	\$4,934,360.74 100.26%
Revenue: (\$1,319,688.35) Expense: \$1,309,645.61 Account # 20 9,783.53 TANF 28,137.00 Health Initiative 2,967.50 In Kind 174,547.00 USDA 15,861.20	Encumb Rev: \$0.	00 Encui	nb Exp: (\$2,718.	00) Net:	(\$12,760.74)
NET SPEND <u>\$ 1,078,349.38</u>					

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COLLEGE OF SOUTHERN IDAHO 2009-2010 DORMITORY ROOM AND BOARD CHARGES

February 27, 2008

	MEALS	DOUBLE	SINGLE
ROOM CHARGE		1,175.00	1,375.00
100 MEAL PLAN	693.40		
SALES TAX	41.60		
MEAL TOTAL	735.00		
ROOM & BOARD		1,910.00	2,110.00
\$ 0 SCRIPT MONEY			
ROOM CHARGE		1,175.00	1,375.00
125 MEAL PLAN	768.88		
SALES TAX	46.12		
MEAL TOTAL	815.00		
ROOM & BOARD		1,990.00	2,190.00
\$25 SCRIPT MONEY			
ROOM CHARGE		1,175.00	1,375.00
150 MEAL PLAN	882.08		
SALES TAX	52.92		
MEAL TOTAL	935.00		
ROOM & BOARD		2,110.00	2,310.00
\$50 SCRIPT MONEY			
ROOM CHARGE		1,175.00	1,375.00
200 MEAL PLAN	1,009.43	-	
SALES TAX	60.57		
MEAL TOTAL	1,070.00		
ROOM & BOARD	•	2,245.00	2,445.00
\$75 SCRIPT MONEY			
ROOM CHARGE		1,175.00	1,375.00
250 MEAL PLAN	1,146.23		
SALES TAX	68.77		
MEAL TOTAL	1,215.00		
ROOM & BOARD		2,390.00	2,590.00
\$100 SCRIPT MONEY			

	PREVIOUS	CURRENT	DOLLAR	PERCENT
ROOM & BOARD PLANS	2008-2009	2009-2010	INCREASE	INCREASE
DOUBLE ROOM 100 MEALS	1,870.00	1,910.00	40.00	2.14%
DOUBLE ROOM 125 MEALS	1,950.00	1,990.00	40.00	2.05%
DOUBLE ROOM 150 MEALS	2,075.00	2,110.00	35.00	1.69%
DOUBLE ROOM 200 MEALS	2,200.00	2,245.00	45.00	2.05%
DOUBLE ROOM 250 MEALS	2,350.00	2,390.00	40.00	1.70%
SINGLE ROOM 100 MEALS	2,070.00	2,110.00	40.00	1.93%
SINGLE ROOM 125 MEALS	2,150.00	2,190.00	40.00	1.86%
SINGLE ROOM 150 MEALS	2,275.00	2,310.00	35.00	1.54%
SINGLE ROOM 200 MEALS	2,400.00	2,445.00	45.00	1.87%
SINGLE ROOM 250 MEALS	2,550.00	2,590.00	40.00	1.57%

NOTE 1: INCREASED REVENUE WILL ONLY COME FROM INCREASED OCCUPANCY NOTE 2: DOUBLE ROOM RATES WERE KEPT AT \$1,175 PER SEMESTER

SINGLE ROOM RATES WERE KEPT AT \$1,375 PER SEMESTER NOTE 3: ABOVE INCREASES REPRESENT A 5.0% INCREASE IN FOOD COSTS, A REDUCTION TO ALMOST 0 IN COLLEGE MEAL PLAN MARK UPS AND NO INCREASE IN ROOM CHARGES

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April 14, 2009

To: President Beck and the College of Southern Idaho Board of Trustees

From: Mike Mason

Re: Condensing Unit and Coil Upgrade for Desert Building

We received eight bids for the specified replacement and installation of the condensing unit and coils for the Desert Building HVAC system. The bids were as follows:

Source Refrigeration	\$62,122.14
American Mechanical Corp.	41,530.00
Terry's Heating	35,190.00
Ridgeway Industrial	35,026.00
Hobson Fabricating	33,600.00
Jet Heating	33,261.00
TML	32,800.00
Sawtooth Sheet Metal	32,459.00

Based upon a review of the bid by Randy Dill and Allen Scherbinske, it is my recommendation that we accept the low bid of Sawtooth Sheet Metal of Twin Falls, Idaho in the amount of \$32,459.

Funding for this purchase is from the State of Idaho Division of Public Works through delegated project number 09092D.

IDENTITY THEFT PREVENTION PROGRAM

Purpose:

To implement a prevention program to detect, prevent and mitigate identity theft in connection with new or existing covered accounts.

Additional Reference:

Fair and Accurate Credit Transactions Act (FACTA) of 2003

Scope:

This policy applies to all University employees, students, contractors, and affiliates who have access to personally identifying information and/or covered accounts.

Responsible Party:

Dean of Finance, 732-6210

Definitions:

Covered account – includes all student accounts or loans administered by the College.

Identity theft – fraud committed or attempted using the identifying information of another person without authority.

Personally identifying information – any name or number that may be used alone or in conjunction with other information to identify a specific person including an individual's name, address, date of birth, social security number, driver's license number, passport number, tax identification number, student identification number, or banking account information.

Red flag – a pattern, practice or specific activity that indicates the possible existence of identity theft.

POLICY

I. Policy Statement

In accordance with the Fair and Accurate Credit Transactions Act (FACTA) of 2003, the University has established an Identify Theft Prevention Program to identify relevant red flags for new and existing covered accounts, detect new red flags, and respond appropriately to any red flags that are detected.

- II. Identification of Red Flags
 - A. In order to identify relevant red flags, the College must consider the types of accounts it maintains, methods it provides to open and access these accounts and its previous experiences with identity theft. Accordingly, the following red flags have been identified for each of the categories listed:
 - 1. Notifications and Warnings from Credit Reporting Agencies
 - a. Report of fraud accompanying a credit report;
 - b. Notice or report from a credit agency of a credit freeze on an applicant;
 - c. Notice or report from a credit agency of an active duty alert for an applicant;
 - d. Receipt of a notice of address discrepancy in response to a credit report request; and
 - e. Indication from a credit report of activity that is inconsistent with an applicant's usual behavior or activity.
 - 2. Suspicious Documents
 - a. Identification document or card that appears to be forged, altered, or unauthentic;
 - b. Identification document or card on which a person's photograph or physical description is not consistent with the person presenting the document;
 - c. Other document with information that is not consistent with existing student information; and
 - d. Application for services that appears to have been forged or altered.
 - 3. Suspicious Personal Identifying Information
 - a. Identifying information that is inconsistent with other information the student provides, for example two documents with different birth dates;

- Identifying information that is inconsistent with other sources of information, for example supplemental documentation for a student loan with a different address than that on file with the College;
- c. Identifying information that is the same as information shown on other applications that were found to be fraudulent;
- d. Identifying information presented that is consistent with fraudulent activity, for example an invalid phone number or fictitious address;
- e. Social Security Number that is the same as another student or employee;
- f. Address or phone number that is the same as another student or employee; and
- g. An individual who fails to provide complete personal identifying information on an application when prompted to do so.
- 4. Suspicious Covered Activity Account or Unusual Use of Account
 - a. Change of address for an account followed by a request to change the student's name;
 - b. Payments stop on an otherwise consistently up-todate account;
 - Account is used in a way that is not consistent with prior use;
 - d. Mail sent to a student is consistently returned as "undeliverable;"
 - e. A student notifies the College that s/he is not receiving mail sent by the College;
 - f. A student notifies the College that an account has unauthorized activity;
 - g. Breach in the College's computer system security; and

- h. Other unauthorized access to or use of student account information.
- 5. Alerts from Other Sources

Notice to the College from a student, identity theft victim, law enforcement or other individual that the College has opened or is maintaining a fraudulent account for a person engaged in identity theft.

- III. Detecting Red Flags
 - A. Student Enrollment: In order to detect any of the red flags identified above that are associated with the enrollment of a student, College personnel must take the following steps to obtain and verify the identity of the individual opening the account:
 - 1. Require certain identifying information such as name, date of birth, academic records, home address or other identifying information; and
 - 2. Verify the student's identity at the time of issuance of student College of Southern Idaho Identification card by checking student's driver's license or other government issued identification.
 - B. Existing Accounts: In order to detect any of the red flags identified above for an existing covered account, College personnel must take the following steps to monitor transactions on an account:
 - 1. Verify the identification of students requesting information in person, by mail, email or facsimile;
 - 2. Verify the identity of individuals requesting to change billing addresses by mail or email;
 - 3. Provide the student a reasonable means of promptly reporting incorrect billing address changes; and
 - 4. Verify changes in banking information given for billing and payment purposes.
 - C. Consumer Credit Reports: In order to detect any red flags identified above for any covered account for which a credit report is required, the College will take the following steps to assist in identifying address discrepancies:

- Require written verification from any applicant that the address provided by the applicant is accurate at the time the request for the credit report is made to the consumer reporting agency; and
- 2. In the event that notice of an address discrepancy is received, verify that the credit report pertains to the applicant for whom the report was requested and report to the consumer reporting agency an address for the applicant that the College has taken reasonable steps to confirm is accurate.
- IV. Preventing and Mitigating Identity Theft
 - A. Reporting Requirement: In the event that university personnel detect any red flags, the Dean of Finance must be contacted within one (1) business day. Thereafter, one or more of the following steps must be taken, depending on the degree of risk posed by the red flag:
 - 1. Monitor the effected covered account for evidence of identity theft;
 - 2. Contact the student or applicant for which a credit report was run;
 - 3. Change any passwords or other security devices that permit access to covered accounts;
 - 4. Provide the student with a new student identification number;
 - 5. Notify law enforcement;
 - 6. File a Suspicious Activity Report (SAR); or
 - 7. Other action as recommended by the Dean of Finance.
 - B. Protecting Student Identifying Information: In order to prevent the likelihood of indentify theft occurring, the College will take the following steps with respect to its internal operating procedures to protect student identifying information:

- Ensure that institutional web pages are secure or provide clear notice where web pages are not or cannot be secured;
- Ensure complete and secure destruction of paper documents and computer files containing student account information when a decision had been made to discard that information;
- 3. Avoid using social security numbers except when required for tax or other governmental reporting purposes;
- 4. Ensure computer virus protections are up to date; and
- 5. Require and maintain the minimum amount of student information that is necessary for institutional purposes.

V. Program Administration

A. Oversight: Responsibility for implementing and updating the identity theft prevention program lies with the Dean of Finance. The Dean of Finance will be responsible for training College staff about the program and for reviewing SARs on the detection of and response to red flags. The Dean of Finance is also responsible for determining which steps of prevention and mitigation are most appropriate in light of particular circumstances.

 Staff Training and SARs: The Dean of Finance is responsible for training College employees to detect red flags and respond appropriately. The Dean of Finance will work with the appropriate personnel to effectively implement the program and to regularly monitor compliance with the program requirements. The Dean of Finance will develop a reporting procedure for employees to report red flag incidents and will summarize his/her findings for the Vice President of Administration on a biannual basis.

2. Service Provider Arrangements: In the event the College engages a service provider to perform an activity in connection with one or more covered accounts, the university will take the following steps to ensure the service provider performs its duties in accordance with all institutional policies and procedures designed to detect, prevent and mitigate the risk of identity theft:

- a. Require, by contract, that service providers understand and agree to abide by College policies and procedures regarding identity theft: and
- Require, by contract, that service providers report any red flags to the Dean of Finance or the College employee with primary oversight of the service provider.
- 3. Non-Disclosure of Specific Practices: In order to optimize the effectiveness of the Identity Theft Prevention Program, information regarding specific red flag identification, detection, mitigation and prevention practices may need to be limited to the Dean of Finance, his/her supervisor(s), and employees charged with identifying and reporting those red flags.
- 4. Program Updates: The Dean of Finance will periodically review and update the Identity Theft Prevention Program to reflect changes in risks. In so doing, the Dean of Finance will consider the institution's experiences with identity theft, changes in the means by which identity theft occurs, changes in identity theft prevention and detection methods, and changes in the way business relationships are structured with other entities. After considering these changes, the Dean of Finance will determine whether changes to the program, including the type of red flags, are warranted.