



## University of Minnesota Identity Theft Prevention Program

### Self-Identification Questionnaire

The University of Minnesota must comply with a two-part federal regulation known as “The Red Flags Rule” and found at [16 CFR Part 681](#). The Red Flags Rule (RFR) requires the University to implement a written identity theft prevention program designed to detect the warning signs (or "red flags") of identity theft in day-to-day operations. Each unit that handles covered accounts must develop reasonable policies and procedures to identify, detect, and respond to red flags in their area. The University of Minnesota’s *Identity Theft Prevention Program* describes our compliance requirements under the law.

The *University’s Identity Theft Prevention Program* has two sections, each with distinct compliance requirements.

- The main section describes the four “Red Flag” elements representing the bulk of the Program.
- A second section describes the special duties of card issuers.

Use this Self-Identification Questionnaire as a first-step to determine if your area handles covered accounts, and thus must comply with this regulation. Specific compliance requirements are described in the *University’s Identity Theft Prevention Program* and in the “RFR Compliance Guidance” document available on the [University’s Red Flags Rule website](#).

1. Does any unit in your area offer or maintain credit or deposit accounts that allow multiple payments or transactions? Examples include federal financial aid, student loans, and certain types of tuition payment plans.
  - *If yes, your area must comply with 16 CFR Part 681.1 of the Red Flags Rule, by designing, implementing, and maintaining processes to detect, respond and mitigate identity theft in connection with covered accounts.*
2. Does any unit in your area issue a credit or debit card? Stored value cards such as the U Card (Gopher Gold) and payroll deduct cards are included, as they are considered debit cards in this legislation. Gift cards are not included.
  - *If yes, your area must comply with 16 CFR Part 681.2 of the Red Flags Rule, by establishing and implementing procedures to assess the validity of a change of address if you receive notification of a change of address and, within a short period of time afterwards, you receive a request for an additional or replacement card for the same account.*
3. Does any unit in your area offer or maintain a credit or deposit account for which there is a reasonably foreseeable risk to customers or the University of identity theft?
  - *If yes, your area must comply with 16 CFR Part 681.1 of the Red Flags Rule, by designing, implementing, and maintaining processes to detect, respond and mitigate identity theft in connection with covered accounts.*

Contact the Controller’s Office with questions at [controller@umn.edu](mailto:controller@umn.edu) or (612) 624-1617. Guidance and training materials are also available at <http://controller.umn.edu/redflags/>.