Board of Trustees’ Consent Materials

March 25, 2009
6:00 pm
The Rouse Company Foundation Student Services Hall
RCF-400
1. Board members practice respectful dialogue that serves the best interests of the college.

2. Each board member works to integrate servant-leadership into the board culture.

3. Each board member has the opportunity to speak uninterrupted.

4. Board members come prepared – board chair needs to understand what is required and set time and material appropriately.

5. Board chair acts as caretaker for the board – acts as filter, evaluates agenda for time well spent.

6. Board chair speaks for the board to the media.

7. Consent materials are available 10 days in advance; remaining board materials are available seven days in advance.

8. Board members should route any requests for additional information to the board chair or the president at least two business days prior to the board meeting.
Howard Community College’s
Dragon Principles

We promise to help our students, employees, and community members “get there from here.”

We pledge to...

Be friendly
Be helpful to our students and community
Be considerate of each other

And we pledge to...

Respect students, employees, the community, and our fellow board members.
1. Proposed New Hires
2. Vending Services
3. Professor Emeritus Recommendation
4. Maryland Association of Community Colleges Grant Spending
5. Telephone System Upgrade
6. Belmont Change Orders
7. Freelance Design Services
8. Identity Theft Prevention Program
1 – Proposed New Hires

Background: The following is a summary of the proposed new hires for Howard Community College. Each employee's salary is determined by objective analysis of the job skills of the position and by placement in the appropriate salary range, as approved by the board.

Purpose: To approve new hires

Timeline: New hires from the period of February 5, 2009, through March 4, 2009

Recommendation

There were no new hires for the board to approve during this time period.
2 – Vending Services

**Background:** In preparation for May 1, 2009, when the 10-year Coca-Cola exclusive beverage agreement expires, the administration issued a request for proposals (RFP) for beverage, snack, and coffee vending services. The proposals were received on March 5, 2009. Three proposals were submitted: Canteen Vending Services, Coca-Cola, and Pepsi Bottling Group. While all three companies met the selection criteria, the administration recommends accepting proposals from Canteen Vending Services (Option 1-snack and coffee vending) and Coca-Cola (Option 1-beverage exclusivity), for the highest financial return. Once the board approves the recommendation, the administration will work with the vendors to finalize the five-year contract.

**Purpose:** To obtain board approval to award a contract for vending services

**Location:** Main campus

**Timeline:** May 1, 2009 – April 30, 2014

**Proposal details:** See the following item for details

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**Recommendation**

The administration requests that the board of trustees approve:

**Amount:** Estimated commission from sales returned to HCC:
- Canteen Vending Services - **$15,000**
- Coca-Cola - **$44,663**

**Vendor:** Canteen Vending Services and Coca-Cola

**Compliance:** This request is in compliance with college procedure, Purchasing – 62.05.01.
<table>
<thead>
<tr>
<th>COMPANY</th>
<th>OPTIONS</th>
<th>REQUIREMENTS</th>
<th>BENEFITS</th>
<th>COMMISSION RATE</th>
<th>TOTAL ANNUAL ESTIMATED RETURN TO COLLEGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canteen Vending Services</td>
<td>Option 1&lt;br&gt;Snack and Coffee Vending</td>
<td>Exclusive Vending Rights for Snacks and Coffee&lt;br&gt;College to Request 5-Year Contract</td>
<td>8 Credit Card Readers in High Traffic Areas&lt;br&gt;Various Monthly Vending Promotions</td>
<td>15%</td>
<td>$15,000 Commission</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Total: $15,000</td>
</tr>
<tr>
<td>Canteen Vending Services</td>
<td>Option 2&lt;br&gt;Snack, Coffee, Coca-Cola and Pepsi Beverage Vending</td>
<td>Exclusive Vending Rights for Snacks, Coffee, Coca-Cola, and Pepsi&lt;br&gt;Increase Canned Sodas from $.75 to $1.00, and Increase Bottled Drink Prices from $1.25 to $1.50&lt;br&gt;College to Request 5-Year Contract</td>
<td>10 Credit Card Readers in High Traffic Areas&lt;br&gt;Various Monthly Vending Promotions</td>
<td>Snacks and Coffee: 15%&lt;br&gt;Coca-Cola and Pepsi: 25%</td>
<td>$15,000 Commission&lt;br&gt;$21,287 Commission</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Total: $36,287</td>
</tr>
<tr>
<td>Coca-Cola</td>
<td>Option 1&lt;br&gt;Beverage Vending and Partnership</td>
<td>Add 13 Vending Machines, and Include Machines in all New Buildings&lt;br&gt;Exclusive Beverage Vending Rights&lt;br&gt;All Retail Sales on Main Campus Must Be Coca-Cola&lt;br&gt;Year 2 Increase in Prices: Canned Sodas from $.75 to $1.00, Bottled Drinks From $1.25 to $1.50&lt;br&gt;5-Year Contract</td>
<td>15 Credit Card Readers in High Traffic Areas&lt;br&gt;Marketing Promotions: $2.500&lt;br&gt;Free Product: 75 Cases of Canned Sodas OR 75 Cases of Bottled Water $2.00 - $3.25 Per Case Rebate on All Cases Ordered by College Purchase Order&lt;br&gt;Additional Base Support: $10,000</td>
<td>All Canned and Bottled Beverages: 35%&lt;br&gt;Energy Drinks and Minute Maid Juices: 15%</td>
<td>$34,663 Commission&lt;br&gt;$10,000 Additional Base Support (Contingent on the sale of 9000 cases)</td>
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<tr>
<td></td>
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<td></td>
<td>Total: $44,663</td>
</tr>
<tr>
<td>Coca-Cola</td>
<td>Option 2&lt;br&gt;Beverage Vending</td>
<td>Exclusive Beverage Vending Rights&lt;br&gt;Year 2 Increase in Prices: Canned Sodas from $.75 to $1.00, Bottled Drinks From $1.25 to $1.50&lt;br&gt;5-Year Contract</td>
<td>15 Credit Card Readers in High Traffic Areas</td>
<td>All Canned and Bottled Beverages: 35%&lt;br&gt;Energy Drinks and Minute Maid Juices: 15%</td>
<td>$34,663 Commission</td>
</tr>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td>Total: $34,663</td>
</tr>
<tr>
<td>Pepsi Bottling Group</td>
<td>Beverage Vending</td>
<td>Exclusive Beverage Vending Rights&lt;br&gt;Increase All Bottled Drinks from $1.25 to $1.50, and Gatorade, Specific Juices and SoBe Water are Priced at $1.75&lt;br&gt;5-Year Contract</td>
<td>Will Place Credit Card Readers in High Traffic Areas&lt;br&gt;2 Vending Promotions Per Year: $5,000&lt;br&gt;Free Product: 100 Cases of Canned Sodas and 100 Cases of Bottled Water&lt;br&gt;Additional Base Support: $8,000</td>
<td>All Bottled Beverages: 30%&lt;br&gt;Gatorade, SoBe, Dole Juices, Energy Drinks: 20%</td>
<td>$29,910 Commission&lt;br&gt;$8,000 Additional Base Support</td>
</tr>
<tr>
<td></td>
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<td></td>
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<td>Total: $37,910</td>
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</tbody>
</table>
3 – Professor Emeritus Recommendation

**Background:** College procedure 10.15 outlines the criteria under which a retiring faculty person will qualify for professor emeritus status, including:

- Ten continuous years as a member of the full-time faculty of Howard Community College.
- Recognition by peers and supervisors as having made an outstanding contribution to the quality of instruction at Howard Community College.
- Recognition as having contributed significantly to the quality and growth of the college as a whole.
- Substantial contributions to the community, profession, and/or discipline.
- Holding the rank of associate or full professor.

The professor emeritus candidate is nominated by his or her division chair and recommended by the full faculty, the vice president of academic affairs, and the president.

Professors emeriti are eligible for privileges, which include continued faculty listing in the catalogue, tuition waiver, standing invitation to participate in institutional functions, faculty rates for institutionally sponsored events, limited use of institutional resources like the library and computer labs, and the opportunity to participate in health and insurance programs at group rates.

**Purpose:** Professor emeritus rank is bestowed by the board of trustees to recognize and reward the professional excellence and contributions of a retiring faculty person.

**Timeline:** FY09

**Recommendation**

The administration requests that the board of trustees approve the nomination to professor emeritus of Professor Andrew Bulleri in recognition of his contributions to the quality of instruction, to growth of the institution, to the community, and to their disciplines.

**Compliance:** This request is in compliance with college procedure, Professor Emeritus – 10.15.
4 – Maryland Association of Community Colleges Grant Spending

Background: Each semester, approximately 350 HCC nursing students utilize six adult, one pediatric (child), and two infant (baby) scenario-based training patient care manikins to practice clinical nursing skills in the simulation laboratories. Additional scenario based training manikins are needed for the following:

1. To meet the clinical practice needs of approximately 350 nursing students in the simulation laboratories. Increasing the number of scenario-based manikins will allow more opportunities for students to practice simulated real life patient scenarios that include critical thinking skills. Instructors can use pre-programmed scenarios or create their own scenarios to customize student learning.
2. To replace outdated non-scenario based manikins. These outdated manikins do not have any computerized simulation capabilities.

The nursing department has been using Physician’s Sales and Services (PSS) to supply its nursing lab with instructional supplies for the last 10 years. PSS is a local company with competitive prices. The company delivers within two days for free.

In November, the board approved a request for purchases not to exceed $30,000 for FY09. The nursing department has received a Maryland Association of Community Colleges (MACC) grant for approximately $208,000 that will allow it to purchase additional instructional laboratory supplies among other things. The grant funds must be spent by June 30, 2009. The nursing department would like to purchase supplies for future use and positively impact the FY10 operating budget. In accordance with college policy and in anticipation that purchases may exceed $30,000, the nursing department has asked three major suppliers to provide quotes on a list of common items ordered each year. In addition to the routine supplies, the department would like to purchase nine adult, one pediatric, and one infant VitalSim patient care manikins, one National League of Nursing (NLN) simulation scenarios Volume1 single user license, and one day teacher training with VitalSim scenarios. The total amount for these special supplies is $79,782.

The nursing lab supports the college’s philosophy on sustainability and routine supplies that can be repackaged will be used repeatedly before being discarded.

Purpose: To obtain board approval to purchase additional nursing supplies

Location: Health sciences division- main campus (nursing simulation laboratories)

Timeline: FY09
Specifications: Nine adult, one pediatric, and one infant VitalSim patient care manikins in Black and Hispanic skin tones; NLN simulation scenarios Volume 1, single user license, and one day teacher training with VitalSim scenarios.

The college requested quotes for 98 items routinely ordered for HCC’s nursing lab from three companies: PSS, Moore Medical, and BoundTree Medical. The three companies only have 35 of the 98 items in common. PSS offers the best pricing for those 35 items. PSS can supply 76 percent of the supplies that are needed, Moore Medical 65 percent and BoundTree Medical 56 percent. When comparing prices for the supplies that PSS and Moore Medical can provide (53 out of 98 items) for the year, price comparison for single packages, Moore Medical is least expensive by $36.86, but can only meet 65 percent of the college’s needs. The department is requesting that the college continue to purchase most of the supplies from PSS and purchase single package supplies from Moore Medical, utilizing grant funds.

Bids: Laerdal Medical Corporation is the sole manufacturer and sole distributor of the VitalSim patient care manikins in Black and Hispanic skin tones.

Routine supplies:

<table>
<thead>
<tr>
<th>35 Common Item Comparison Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bound Tree Medical</td>
</tr>
<tr>
<td>Moore Medical</td>
</tr>
<tr>
<td>PSS</td>
</tr>
</tbody>
</table>

Recommendation

The administration requests that the board of trustees approve:

Amount: $79,782 for manikins and an additional $30,000 above the approved amount of $30,000 for a total not to exceed $60,000, for routine supplies

Vendors: Laerdal Medical Corporation (sole source for manikins)
         Physician’s Sales and Services (routine supplies)

Source of funds: MACC Grant - Fiscal Year 2009

Compliance: This request is in compliance with college procedure, Purchasing – 62.05.01.
5 – Telephone System Upgrade

Background: The college’s private branch exchange (PBX) telephone system is a NEC product that was purchased in 2000 from Verizon. The PBX has been kept up-to-date in good operating order through ongoing upgrades and maintenances. The PBX has reached its end of service date with the company and needs to be replaced or upgraded to accommodate changes in telephone technology and campus growth.

The college completed a request for information (RFI) that was sent to several telephony vendors to determine the best solution for the college. The review of the RFI responses has resulted in a recommendation of a solution offered by Verizon Select Services Division. Verizon provides a solution that would allow the college to phase in upgrades to the current NEC PBX while investing in new technology that will replace the PBX technology as funding becomes available. This solution is cost effective and the least intrusive to the college community and services.

The total cost of the project is $1,235,701. It is anticipated it will take approximately three years to complete. The first phase of the project will cost $421,680 and will be funded through the Clark library building project and FY09 capital funds. The first phase will provide technology to support new features and functions of the phone system for the college community and will enable the expansion of the phone system to meet future growth. It will also provide support for the upgrade of phones in the Clark library building and limited upgrades of consoles and phones in other college offices and buildings. It will also provide the base technology to expand the system for the rest of the campus in phases two and three.

The second and third phases of the project, costing $814,021, will be completed pending capital funds allocated in fiscal years 2010 and 2011.

Purpose: To obtain board approval to purchase and install telephone equipment and services

Timeline: FY09 – FY11

Specifications: NEC telephone system equipment upgrade, installation services, and technical training for telecom technicians

Bids: Verizon Select Services, Inc. holds a Maryland state contract for telephone technology and services.
The administration requests that the board of trustees approve:

**Amount:** $1,235,701

**Vendor:** Verizon Select Services, Inc.

**Source of funds:**
- FY09: Clark library building capital funding
- FY10 and FY11: capital and operating funds as available

**Compliance:** This request is in compliance with college procedure, Purchasing – 62.01.01
6 – Belmont Change Orders

**Background:** The construction management at risk contract for the Belmont barn renovation was awarded by the board of trustees to Struever Bros. Eccles & Rouse, Inc. on September 19, 2007. Only the preconstruction services were awarded in the amount of $38,352, which is typically followed by the award of construction services and the guaranteed maximum price (GMP).

As the college is aware, the GMP is developed during the design phase and specifically at 50-95 percent construction documents. In the RFP for the construction manager at risk, the special services consisting of surveying, septic system, geotechnical, and environmental investigations were to be included for all bidders. These services were to start during the design phase and it was assumed the costs would be included in the GMP. The justification for this was the fast-track delivery requirements outlined in the RFP as part of the project. Based on the project schedule, it was projected that the design would progress and the GMP would be developed within four to six months.

However, as the project continued to encounter unforeseen conditions, the completion of these special services was required to be done in order for the design to proceed and prior to the completion of the GMP. During the project, the administration authorized the contractor to proceed with certain unexpected items as emergency procurements. Many of these items surfaced due to directives for additional work necessary to meet Howard County requirements. These additional services were not submitted as official change orders and were paid.

The special services required in the RFP, including the surveying, septic system design, geotechnical, and environmental (hazmat) investigations are listed below.

<table>
<thead>
<tr>
<th>Special Services in the RFP</th>
<th>Cost $</th>
</tr>
</thead>
<tbody>
<tr>
<td>Topographical Survey</td>
<td>7,510</td>
</tr>
<tr>
<td>Septic Design</td>
<td>16,200</td>
</tr>
<tr>
<td>Geotechnical Investigation</td>
<td>7,796</td>
</tr>
<tr>
<td>Geotechnical Investigation Underground Location</td>
<td>190</td>
</tr>
<tr>
<td>Hazmat Survey</td>
<td>1,655</td>
</tr>
<tr>
<td>Geothermal Topographical Survey</td>
<td>4,880</td>
</tr>
<tr>
<td>Geothermal Conductivity Test</td>
<td>11,550</td>
</tr>
<tr>
<td><strong>Total Special Services included in the RFP:</strong></td>
<td><strong>$49,781</strong></td>
</tr>
</tbody>
</table>

In addition to the above special services, the Howard County Health Department and the Maryland Department of the Environment (MDE) required that a number of tests and additional surveys be performed for the septic system and the geothermal field. In order not to delay the contract, Struever proceeded with these items as follows:
<table>
<thead>
<tr>
<th>Howard County Health Department and MDE Requirements</th>
<th>Cost $</th>
</tr>
</thead>
<tbody>
<tr>
<td>MDE Required Testing for Septic</td>
<td>4,685</td>
</tr>
<tr>
<td>Geothermal Well Field Survey</td>
<td>750</td>
</tr>
<tr>
<td>2nd Perc Test Design/Stakeout</td>
<td>1,650</td>
</tr>
<tr>
<td>Extended Septic Area Topo Survey</td>
<td>1,795</td>
</tr>
<tr>
<td>2nd Perc Test Excavation</td>
<td>1,450</td>
</tr>
<tr>
<td>3rd Perc Test Excavation</td>
<td>2,363</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>$12,693</strong></td>
</tr>
</tbody>
</table>

Although the costs associated with these services have already been paid, it is important to note that they were billed at the subcontractors’ cost of work with no additional management hours or mark-up costs added for Struever Bros.

In addition to the above items, the Howard County Health Department is now requiring that all the septic systems at Belmont for the entire property be surveyed before proceeding with any work. Based on this requirement, change order 7 is presented to the board of trustees at this time for $11,100. It includes a survey to locate all existing septic areas, and the development of a preliminary septic site plan to be used for the design of the reserve systems. It also includes the stakeout of water table and percolation (perc) test locations. The additional spending allowance for any required perc tests is requested not to exceed $8,000.

**Purpose:** For the board of trustees to authorize $49,781 for special services including surveying, septic system, geotechnical, and environmental costs and to authorize the additional work required by the Howard County Health Department and MDE for $12,693. In addition, to approve change order 7 in the amount of $19,100 ($11,100 plus $8,000 spending allowance for additional surveying and perc tests) as required by the Howard County Health Department.

**Location:** Belmont Conference Center

**Timeline:** April 2009

**Specifications:** Special services, governmental requirements, and change order 7

**Recommendation**

The administration requests that the board of trustees approve:

**Amount:** $81,574

**Vendor:** Struever Bros. Eccles & Rouse, Inc.

**Source of funds:** FY09 Capital Budget, Belmont Conference Center

**Compliance:** This request is in compliance with college procedure, Purchasing - 62.05.01.
7 – Freelance Design Services

**Background:** The office of public relations and marketing employs one graphic designer. Due to the steadily increasing demand for print and electronic marketing materials by college departments, the office has been outsourcing selected, high-profile design projects to freelancer Barbara Van Rossum. She has worked for the college on a number of projects over the years; however, the cost has never exceeded $24,999. Van Rossum’s services have been critical for important projects including the Columbia Classic Grand Prix, Rep Stage, Vino Scholastico, continuing education, and Belmont. Special projects in FY09, including Repartee, the Horizon Foundation-funded jobs project, and the capital campaign, require that additional work be outsourced to Van Rossum as a sole source in order to maintain consistency of design style and to meet increased demand for those projects that require additional expertise.

**Purpose:** To obtain board approval to outsource additional graphic design services to freelancer Barbara Van Rossum.

**Timeline:** FY09

**Bids:** Sole source

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**Recommendation**

The administration requests that the board of trustees approve:

**Amount:** Not to exceed $35,000

**Vendor:** Barbara Van Rossum

**Source of funds:** FY09 operating budget

**Compliance:** This request is in compliance with college procedure, Purchasing – 62.05.01.
8 – Identity Theft Prevention Program

**Background:** Pursuant to the Federal Trade Commission's (FTC) Red Flags Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003, Howard Community College is required to implement an Identity Theft Prevention Program that is approved by the board of trustees.

As many colleges were not aware of this requirement, the implementation date was extended to May 1, 2009. The attached document is the policy that the administration is proposing to implement based on the regulations determined by the FTC.

The audit and finance committee reviewed the following draft document and suggested that periodic audits of the areas be performed. This verbiage was added to the document that the board is now receiving

**Purpose:** To implement an identity theft prevention program

**Location:** College-wide

**Timeline:** Implementation would begin May 1, 2009

**Specifications:** The specifications of the program are spelled out in the following document.

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**Recommendation**

The administration requests that the board of trustees approve the identity theft prevention program as recommended by the audit and finance committee at its March 10, 2009, meeting.

**Compliance:** The policy is in compliance with Board Policy: Asset Protection
Howard Community College
DRAFT-Identity Theft Prevention Program
I. PROGRAM ADOPTION

Howard Community College (college) developed this Identity Theft Prevention Program (program) pursuant to the Federal Trade Commission’s (FTC) Red Flags Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003. This program was developed with approval of the Howard Community College Board of Trustees. After consideration of the size and complexity of the college’s operations and the nature and scope of the college’s activities, the Howard Community College Board of Trustees determined that this program was appropriate for the college, and therefore approved this program on March 25, 2009.

II. DEFINITIONS AND PROGRAM

A. Red Flags Rule Definitions Used in this Program

1. **Identity theft** is a fraud committed or attempted using the identifying information of another person without authority.
2. A **Red Flag** is a pattern, practice, or specific activity that indicates the possible existence of identity theft.
3. A **covered account** includes all student accounts or loans that are administered by the college.
4. **Program administrator** is the individual designated with primary responsibility for oversight of the program. The program administrator will be the vice president of information technology.
5. A **Committee** under the direction of the **program administrator** will be established to carry out the program. In addition to representation from information technology, other members of the committee will be from the areas of student services and administration and finance.
6. **Identifying information** is any name or number that may be used, alone or in conjunction with any other information, to identify a specific person, including: name, maiden name, address, telephone number, social security number, date of birth, government issued driver’s license or identification number, alien registration number, government passport number, employer or taxpayer identification number, student identification number, credit card information, or computer internet protocol (IP) address.
7. **Implementation** will occur on or before May 1, 2009.

B. Fulfilling Requirements of the Red Flags Rule

Under the Red Flags Rule, the college is required to establish an *Identity Theft Prevention Program* tailored to its size, complexity and the nature of its operation. The program must contain reasonable policies and procedures to:

1. Identify relevant red flags for new and existing covered accounts and incorporate those red flags into the program and incorporate existing policies and procedures into the program;
2. Detect red flags that have been incorporated into the program;
3. Respond appropriately to any red flags that are detected to prevent and mitigate identity theft; and
4. Ensure the program is updated periodically to reflect changes in risks to students or to the safety of the student from identity theft.
III. IDENTIFICATION OF RED FLAGS

In order to identify relevant red flags, the college considers the types of accounts that it offers and maintains, methods it provides to open its accounts, methods it provides to access its accounts, and its previous experiences with identity theft. The college identifies the following red flags in each of the listed categories:

A. Notifications and Warnings from Consumer Reporting Agencies or other Organizations

Red Flags

1. Report of fraud;
2. Notice or report from a credit agency of a fraud or active duty alert for an applicant;
3. Notice of address discrepancy; and
4. Indication from a credit report of activity that is inconsistent with an applicant’s usual pattern or activity.

B. Suspicious Documents

Red Flags

1. Identification document or card that appears to be forged, altered, or inauthentic;
2. Identification document or card on which a person’s photograph or physical description is not consistent with the appearance of the person presenting the document;
3. Other document with information that is not consistent with existing student information; and
4. Application for service that appears to have been altered or forged.

C. Suspicious Personal Identifying Information

Red Flags

1. Identifying information presented that is inconsistent with other information the student provides (example: inconsistent birth dates) or with information that is on file for the student;
2. Identifying information presented that is inconsistent with other sources of information;
3. Identifying information presented that is the same as information shown on other applications that were found to be fraudulent;
4. Identifying information presented that is consistent with fraudulent activity (such as an invalid phone number or fictitious billing address); and
5. Social security number presented that is the same as one given by another student.

D. Suspicious Covered Account Activity or Unusual Use of Account

Red Flags

1. Change of address for an account followed by a request to change the student’s name;
2. Account used in a way that is not consistent with prior use;
3. Mail sent to the student is repeatedly returned as undeliverable;
4. Notice to the college that a student is not receiving mail sent by the college;
5. Notice to the college that an account has unauthorized activity;
6. Breach in the college’s computer system security; and
7. Unauthorized access to or use of student account information.

E. Alerts from Others

Red Flag

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

IV. DETECTING RED FLAGS

A. Student Enrollment
In order to detect any of the red flags associated with the enrollment of a student, college personnel will take the following steps to obtain and verify the identity of the person opening the account:

1. Require identifying information as stated in the college catalog.
2. Verify the student’s identity, as stated in the college catalog, at time of issuance of HCC student identification card.

B. Existing Accounts
In order to detect any of the red flags for an existing covered account, college personnel will take the following steps to monitor transactions on an account:

Detect

1. Verify the identification of students if they request information (in person, via telephone, via facsimile, via email);
2. Verify the validity of requests to change billing addresses by mail or email and provide the student a reasonable means of promptly reporting incorrect billing address changes; and
3. Verify changes in payment information given for billing and payment purposes.

C. Employee Background Report Requests
In order to detect any of the red flags for an employment or volunteer position for which a criminal background report is sought, college personnel will take the following steps to assist in identifying address discrepancies:

1. Require written verification from any applicant that the address provided by the applicant is accurate at the time before the request for the background report is made to the consumer reporting agency.

V. PREVENTING AND MITIGATING IDENTITY THEFT

In the event college personnel detect any identified red flags, such personnel shall take one or more of the following steps, depending on the degree of risk posed by the red flag:
Prevent and Mitigate

1. Continue to monitor a covered account for evidence of identity theft;
2. Contact the student;
3. Change any passwords or other security devices that permit access to covered accounts;
4. Not open a new covered account;
5. Provide the student with a new student identification number;
6. Notify the program administrator for determination of the appropriate step(s) to take;
7. Notify law enforcement;
8. File or assist in filing a Suspicious Activities Report; or
9. Determine that no response is warranted under the particular circumstances.

Protect Student Identifying Information

In order to further prevent the likelihood of identity theft occurring with respect to covered accounts, the college will take the following steps with respect to its internal operating procedures to protect student identifying information:

1. Ensure that its website is secure or provide clear notice that the website is not secure;
2. Ensure complete and secure destruction of paper documents and computer files containing student account information when a decision has been made to no longer maintain such information;
3. Ensure that office computers with access to covered account information are password protected;
4. Avoid use of social security numbers;
5. Ensure computer virus protection is up-to-date; and
6. Require and keep only the kinds of student information that are necessary for college purposes.

VI. PROGRAM ADMINISTRATION

A. Oversight
Responsibility for developing, implementing, and updating this program lies with an identity theft committee (committee) for the college. The committee is headed by a program administrator who will be the vice president of the information technology. Two or more other individuals from the areas of student services and administration and finance in addition to the program administrator comprise the committee membership. The program administrator or his/her designee will be responsible for ensuring appropriate training of college staff on the program, for reviewing any staff reports regarding the detection of red flags, and the steps for preventing and mitigating identity theft, determining which steps of prevention and mitigation should be taken in particular circumstances, and considering periodic changes to the program. **Periodic audits of various areas will be conducted.**

B. Staff Training and Reports
College staff responsible for implementing the program shall be trained either by or under the direction of the program administrator or his/her designee in the detection of red flags and the responsive steps to be taken when a Red Flag is detected. College staff shall be trained, as necessary, to effectively implement the program. College employees are expected to notify the program administrator once they become aware of an incident of identity theft or of the college’s failure to comply with this program. At least annually, or as
otherwise requested by the program administrator, college staff responsible for
development, implementation, and administration of the program shall report to the program
administrator on compliance with this program. The report should address such issues as
effectiveness of the policies and procedures in addressing the risk of identity theft in
connection with the opening and maintenance of covered accounts, service provider
arrangements, and significant incidents involving identity theft and management’s response
and recommendations for changes to the program.

C. 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 college will take the following steps to ensure the
service provider performs its activity in accordance with reasonable policies and procedures
designed to detect, prevent, and mitigate the risk of identity theft.

1. Require, by contract, that service providers have such policies and procedures in
place; and
2. Require, by contract, that service providers review the college's program and report
any red flags to the program administrator or the college employee with primary
oversight of the service provider relationship.

D. Non-disclosure of Specific Practices
For the effectiveness of this identity theft prevention program, knowledge about specific red
flag identification, detection, mitigation and prevention practices may need to be limited to
the committee who developed this program and to those employees with a need to know
them. Any documents that may have been produced or are produced in order to develop or
implement this program that list or describe such specific practices and the information
those documents contain are considered confidential and should not be shared with other
employees or the public. The program administrator shall inform the committee and those
employees with a need to know the information of those documents or specific practices
that should be maintained in a confidential manner.

E. Program Updates
The committee will periodically review, audit, and update this program to reflect changes in
risks to students and the security of the college from identity theft. In doing so, the
committee will consider the college's experiences with identity theft situations, changes in
identity theft methods, changes in identity theft detection and prevention methods, and
changes in the college's business arrangements with other entities. After considering these
factors, the program administrator will determine whether changes to the program, including
the listing of red flags, are warranted. If warranted, the committee will update the program.

Signature__________________________________ Date________________________
Chair, Howard Community College
Board of Trustees