## GOOD SAMRITAN COLLEGE OF NURSING AND HEALTH SCIENCE CINCINNATI, OHIO

## POLICY: IDENTITY THEFT

Under the Federal Educational Rights and Privacy Act of 1974 (FERPA), the college recognizes the rights of its students when it comes to sharing data that is personally identifiable to an individual student.

The protection of identity theft can be related to some items that as "stand alone" are not personally identifiable but become personally identifiable once they are linked to one or more of the defined personally identifiable categories or those items considered "directory information".

Good Samaritan College of Nursing and Health Science has identified Items that can be linked with personally identifiable or directory information to enable identity theft and/or fraud.

They include, but are not limited to:

- Social Security Numbers
- Credit Card Numbers
- Checking Account Numbers

Enrollment Management is directly responsible for the protection of all data that could lead to identity theft/fraud.

Two separate software systems are used which contain personally identifiable student data that could lead to identity theft and/or fraud. They are SonisWeb (the student data base software) and ImageNow (scanning software). Contents of data stored in the software is available to college personnel on a "need to know" basis. Security for access to this software is maintained by the Registrar's Office. ImageNow is also utilized by TriHealth Accounting, and is again, regulated on a "need to know" basis in accordance with TriHealth Accounting policies and procedures.

| Approved By:                                 | Date: <u>09/27/2010</u> |
|--|-------------------------|
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| Responsible Committee: Enrollment Management |                         |