

**AGENDA**  
**Northern Wyoming Community College District**  
**Board of Trustees Meeting**  
**Sheridan College Board Room W 145C**  
**Thursday, December 16, 2010**  
**7:00 p.m.**

- 1. Call to Order and Roll Call**
- 2. Board Reorganization: Election of Officers – Chair Bruce Hoffman**
- 3. Agenda Additions/Deletions**
- 4. Consent Agenda**
  - a. Minutes – November 18, 2010**
  - b. Financial Reports**
- 5. President’s Report**
  - a. Foundation Report – Susan Bigelow, Vice President of Development**
- 6. Gillette College Advisory Board Report – Dave Ebertz, Chair**  
**Sheridan College in Johnson County Advisory Board Report – Jack Tarter, Chair**
- 7. Organization Reports: Student Senate – Tyler Guthrie, President**  
**Classified Staff – Doris Ostrowski, President**
- 8. Public Comments**
- 9. Unfinished Business**
- 10. New Business**
  - a. Presentation of Audit Report – Joni Kumor, CPA**
  - b. Summer Hours of Operation – Cheryl Heath, VP**
  - c. Red Flag Rule: Identity Theft – Cheryl Heath, VP**
  - d. ACTE 2010 Annual Convention and Career Tech Expo Report – Trustees Bruce Hoffman and Robert Leibrich**
  - e. Board Retreat Date –President Paul Young**
- 11. Executive Session – As outlined in W.S. 16-4-405(vii)**
- 12. Adjourn**

## **2. Board Reorganization**

The Board will conduct an election of officers for the coming year. Positions to be filled are:

- President
- Vice President
- Secretary
- Treasurer
  
- Two trustees will be appointed to serve as representatives for the Wyoming Association of Community College Trustees (WACCT) and will be appointed for the coming year.
  
- Two trustees will be appointed to serve as representatives for the Board of Cooperative Higher Education Services (BOCHES) Board and will be appointed for the coming year.

The Nomination Committee made the following nominations for the positions at the November 18, 2010, Board meeting as follows:

- President – Kati Sherwood
- Vice President – Bruce Hoffman
- Secretary – Rolf Distad
- Treasurer – Robert Leibrich
- WACCT Representatives – Kati Sherwood and Norleen Healy
- BOCHES Board – Bruce Hoffman and Robert Leibrich

### **10a. Presentation of Audit Report**

Joni Kumor, CPA and partner, with Lenhart, Mason and Associates, LLC, will present the final audit report for the Northern Wyoming Community College District for the fiscal year ended June 30, 2010.

### **10b. Summer Hours of Operation**

Administration supports summer hours of operation to begin May 10 and end August 15 (two weeks before school starts). The core hours will be Monday – Thursday from 7:30 am – 5:30 pm.

## 10c. Red Flag Rule: Identity Theft

The district has developed an Identity Theft Prevention Program (“Program”) pursuant to the Federal Trade Commission's Red Flags Rule (“Rule”), which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003. The Fair and Accurate Credit Transactions Act of 2003 requires educational institutions to comply with this rule, and for the governing Board to adopt this program.

### NWCCD Identity Theft Prevention Program

#### Program Adoption

NWCCD (“District”) developed this identity Theft Prevention Program (“Program”) pursuant to the Federal Trade Commission's Red Flags Rule (“Rule”), which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003.

After consideration by the Vice President of Administration and CFO of the size of the District's operations and account systems, and the nature and scope of the District's activities, it was determined that this Program was appropriate for the District, and therefore the Board of Trustees adopted this Program on December 16, 2010.

#### Definitions

**Identify theft** means fraud committed or attempted using the identifying information of another person without authority.

A **covered account** means an account that a creditor offers or maintains, primarily for personal, family, or household purposes that involves or is designed to permit multiple payments or transactions.

A **red flag** means a pattern, practice or specific activity that indicates the possible existence of identity theft.

#### Purpose

The purpose of the Identity Theft Prevention Program is to prevent, detect, and mitigate identity theft in connection with the opening of a covered account or an existing covered account and to provide for continued administration of the Program. The Program shall include reasonable processes to:

1. Identify relevant red flags for covered accounts it offers or maintains and incorporate those red flags 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 and to the safety and soundness of the creditor from identity theft.

The program shall, as appropriate, incorporate existing policies, procedures, and processes that control reasonably foreseeable risks.

#### NWCCD Identity Theft Prevention Program - Covered Accounts

NWCCD has identified four types of accounts which are covered accounts administered by the District:

1. Refund of credit balances involving PLUS loans.
2. Refund of credit balances, without PLUS loans.
3. Deferment of tuition payments (payment plans).
4. Emergency loans.

#### Identification of Relevant Red Flags

The Program considers the following risk factors in identifying relevant red flags for covered accounts:

1. The types of covered accounts as noted above;
2. The methods provided to open covered accounts-- acceptance to the District and enrollment in classes requires a common application with personally identifying information;
3. The methods provided to access covered accounts:
  - a) Disbursement obtained in person require picture identification
  - b) Disbursements obtained by mail can only be mailed to an address on file; and
4. The District's previous history of identity theft.

#### The Program identifies the following red flags:

1. Documents provided for identification appear to have been altered or forged;
2. The photograph or physical description on the identification is not consistent with the appearance of the student presenting the identification;
3. A request to mail something to an address not listed on file; or
4. Notice from customers, victims of identity theft, law enforcement authorities, or other persons regarding possible identity theft in connection with covered accounts.

#### Detection of Red Flags

The Program will detect red flags relevant to each type of covered account as follows:

1. Refund of a credit balance involving a PLUS loan – As directed by federal regulation (U.S. Department of Education) these balance are required to be refunded in the parent's name and mailed to their address on file within the time period specified. No request is required. **Red Flag** – none as this is initiated by the District.

2. Refund of credit balance, no PLUS loan – requests from current students must be made in person by presenting a picture ID. The refund check can only be mailed to an address on file or picked up in person by showing picture ID. Requests from students not currently enrolled or graduated from the District must be made in writing. **Red Flag** – Picture ID not appearing to be authentic or not matching the appearance of the student presenting it.
3. Deferment of tuition payment – students are automatically put on a payment plan according to the payment plan process or if requested in person. **Red Flag** – none.
4. Emergency loan - Requests must be made in person by presenting a picture ID. The loan check can only be mailed to an address on file or picked up in person by showing picture ID. **Red Flag** - Picture ID not appearing to be authentic or not matching the appearance of the student presenting it.

#### Response

The Program shall provide for appropriate responses to detected red flags to prevent and mitigate identity theft. The appropriate responses to the relevant red flags are as follows:

1. Deny access to the covered account until other information is available to eliminate the red flag;
2. Contact the student;
3. Change any passwords, security codes or other security devices that permit access to a covered account;
4. Notify law enforcement; or
5. Determine no response is warranted under the particular circumstances.

#### Oversight of the Program

Responsibility for developing, implementing and updating this Program lies with the Vice President for Administration and CFO. The Program Administrator will be responsible for the Program administration, for ensuring appropriate training of District's 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.

#### Updating the Program

This Program will be periodically reviewed and updated to reflect changes in risks to students and the soundness of the District from identity theft. At least once per year in December, the Program Administrator will consider the District's experiences with identity theft, changes in identity theft methods, changes in identity theft detection and prevention methods, changes in types of accounts the District maintains and changes in the District'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 Program Administrator will update the Program.

### Staff Training

District staff responsible for implementing the Program shall be trained either by or under the direction of the Program Administrator in the detection of Red Flags, and the responsive steps to be taken when a Red Flag is detected.

### Oversight of Service Provider Arrangements

The District shall take steps to ensure that the activity of a service provider is conducted in accordance with reasonable policies and procedures designed to detect, prevent and mitigate the risk of identity theft whenever the organization engages a service provider to perform an activity in connection with one or more covered accounts. Currently the District does not contract with a service provider for management of any covered account.

#### **10d. ACTE 2010 Annual Convention and Career Tech Expo Report**

**Trustees Bruce Hoffman and Bob Leibrich will provide a report on the ACTE 2010 Annual Convention and Career Tech Expo they attended on December 1-3 in Las Vegas, NV.**

#### **10e. Board Retreat Date**

**It has been determined that the Annual Board Retreat will be held on Monday and Tuesday, January 10-11, 2011, at The Ranch at Ucross. Board Policy Series 8100(VIII)(H) notes an annual retreat will be scheduled between January and March.**