

Identity Theft Reporting Guidelines

This document has been established in support of university policy section 50.3.9, Identity Theft Compliance Policy. It provides further guidelines on the process flow, communication steps and responsibilities for both determining whether a breach of security or compromise requires notification and for carrying out the notification process.

Designation of a Coordinator of Notification

Both the Executive Vice President for Academic Affairs and the Senior Vice President and Chief Financial Officer have designated a coordinator of notification to address breaches of security or compromises of information within his or her chain of command. The contact information is below.

- Academic Affairs coordinator:
Kenneth J. Iuso
University Registrar
732/445-2620
- Administration and Finance coordinator:
Sandra Russell
Associate Vice President Human Resources
732/932-3020

Designation of an Information Protection Evaluation Team

An Information Protection Evaluation Team (IPET) will investigate and evaluate reported breaches of security or compromises of systems containing personal information, and recommend whether notification should be carried out. Permanent membership of the IPET shall include the following representatives:

- a. Vice President of Student Affairs, or a designee, who will chair the team
- b. Director of the Office of Information Protection and Security
- c. A representative from the Office of General Counsel
- d. A representative from University Relations

The IPET also may be advised by or seek advice from representatives of the following units as needed:

- a. Coordinator of notification designated by the Executive Vice President for Academic Affairs
- b. Coordinator of notification designated by the Senior Vice President and Chief Financial Officer
- c. Rutgers University Police Department
- d. Risk Management Department
- e. Unit in which the incident occurred
- f. Any other unit or department that the IPET determines may provide assistance

How to Report a Breach of Security or Compromise of Systems

If a unit or individual has any suspicion that a potential breach of security or compromise of systems might have occurred, the steps below must be followed in a timely manner:

1. The unit or individual shall report the incident to:
 - a. Unit head's immediate supervisor
 - b. Office of Information Protection and Security (IPS)

2. IPS shall review and evaluate the incident and determine whether it should be referred to the IPET for further action.
3. If IPS refers the incident to the IPET, the team shall conduct fact-finding concerning the incident.
4. The IPET shall prepare a written report about the incident that will include a recommendation on whether notification is warranted. The written report shall be provided to:
 - a. Executive Vice President for Academic Affairs.
 - b. Senior Vice President and Chief Financial Officer.
 - c. Director of Internal Audit

If the potential breach of security or compromise of a system involves a unit or units that do not report to the Executive Vice President for Academic Affairs or the Senior Vice President and Chief Financial Officer, the IPET also shall provide the written report to the appropriate member or members of the President's Cabinet who oversee the unit or units in question. The members of the President's Cabinet to whom this may apply are:

- a. Provost-Camden
 - b. Provost-Newark
 - c. Vice President and General Counsel
 - d. Vice President of University Relations
 - e. Director of Intercollegiate Athletics
5. The Executive Vice President for Academic Affairs and the Senior Vice President and Chief Financial Officer shall make a final determination regarding notification. If the potential breach of security or compromise involves a unit or units that do not report to either of these individuals, the appropriate member or members of the President's Cabinet who oversee the unit or units in question shall participate in making a final determination regarding notification.
6. If the final determination is made that notification should proceed, the Executive Vice President for Academic Affairs and the Senior Vice President and Chief Financial Officer shall instruct their designated coordinators to ensure that notification is carried out in compliance with state and federal law and university policy. The IPET may create additional written materials to provide a guide to notification. Notification shall include but not be limited to:
 - a. Arranging for written and/or electronic notice of affected individuals whose personal information is reasonably believed to have been accessed by an unauthorized party and if misuse of this information is reasonably possible.
 - b. Arranging for members of the university community to be available to answer questions from and provide additional information to affected individuals. Contact information must be included in the written and/or electronic notice.
7. Unless otherwise decided by the relevant coordinator or coordinators, responsibility for notification shall reside within the unit where the breach of security or compromise occurred.
8. Unless otherwise decided by the relevant coordinator or coordinators, all written and/or electronic notification will be clearly identified — either by signature or another appropriate form of identification — as originating from the head of the unit where the breach of security or compromise occurred.
9. Unless otherwise decided by the relevant coordinator or coordinators, the head of the academic or administrative unit where the breach of security or compromise occurred shall be responsible for making the necessary arrangements and providing the necessary resources to answer questions from and provide additional information to affected individuals.

News Media Inquiries

All inquiries from the news media should be directed to the [Office of Media Relations in New Brunswick](#).