New College of Florida
The Honors College

Office of Chief Audit Executive and Chief Compliance Officer

Date: October 20, 2026

To: Richard Corcoran, President
New College of Florida
Sent via email to rcorcoran@ncf.edu

From: Alexander G. Tzoumas, Chief Audit Executive and Chief Compliance Officer

Subject: Identity Theft and "Red Flag" Rules

Dear President Corcoran,

In response to increasingly pervasive risks associated with the custodianship of sensitive personal information, the Fair and Accurate Credit Transaction Act of 2003 (Act) expanded on the Federal Trade Commission's (FTC) Fair Credit Reporting Act of 1970 to provide additional guidance on the protection of personal information that can be used for identity theft. The Act was named the "Red Flags Rule" (Rule) and has been enforced since January 1, 2011. The Rule requires institutions that hold personal information with a reasonably foreseeable risk of identity theft to develop and implement an Identity Theft Prevention Program (Program).

In response to the Act, and a prior State of Florida Auditor General Operational Audit finding, the New College of Florida University (University) created Regulation 3-1014, Identity Theft (Regulation). The Regulation requires the appointment of an Identity Theft Program Administrator. Since there are so many different departments involved with data security and the protection of personal information, the Identity Theft Committee (Committee) has deemed it most appropriate for each of its members to act as the designated Program Administrator for their respective areas of expertise.

We reconvened the Identity Theft Committee again on October 7, 2026 to gauge our progress and once again the members agreed on action plans to further enhance security over personal information in their respective areas. During the 2025 Committee meeting, one place where the plan of action for the Program appeared uncertain was ongoing personnel security training. Since that meeting, Human Resources has teamed with the Chief Information Security Officer to provide more extensive new employee training and implement more effective approaches to assuring employees have a strong understanding of cyber security risks and data security. This year, the Committee added a representative from the Admissions Department to cover applicant data protection. The Committee also recommended the addition of a member of the student Housing and Health Offices. I am attaching the Committee meeting minutes for your information.

In accordance with the University's Identity Theft Regulation, please accept this report as the official update on compliance with the Identity Theft Prevention Program.

cc: Christie FitzPatrick, Vice President for Finance and Administration
Sent via email to cfitzpatick@ncf.edu