

Red Flags Identity Theft Prevention Program

Step 1	Identify relevant patterns, practices, and specific forms of activity that are “red flags” signaling possible identity theft. Use any incidents of identity theft experienced at the retail sales center in the past to help identify sources of “red flags.”		
List of Possible “Red Flags”			
Alerts, Notifications or Warnings from a Consumer Reporting Agency			
1. A fraud or active duty alert is included with a consumer credit report			
2. A consumer reporting agency provides a notice of credit freeze in response to a request for a consumer report			
3. A consumer reporting agency provides a notice of <u>address discrepancy</u> that informs you of a substantial difference between the address used to request the consumer report, and the address(es) in the agency’s file for the consumer			
4. A consumer report indicates a pattern of activity that is inconsistent with the history and usual pattern of activity of an applicant or customer such as: 1) a recent and significant increase in the volume of inquiries; 2) an unusual number of recently established credit relationships; 3) A material change in the use of credit especially with respect to recently established credit relationships; and 4) an account that was closed for cause or identified for abuse of account privileges by a financial institution or creditor.			
5. Documents provided for identification appear to have been altered or forged			
6. The photograph or physical description on the identification is not consistent with the appearance of the applicant or customer presenting the identification			
7. Other information on the identification (i.e. address, date of birth) is not consistent with information provided by the person opening a new covered account or customer presenting the identification			
Suspicious Personal Identifying Information			
1. Address does not match any address in the consumer credit report			
2. The Social Security Number has not been issued, or is listed on the Social Security Administration’s Death Master File			
3. Personal identifying information provided by the customer is not consistent with other personal identifying information provided by the customer. For example, there is a lack of correlation between the SSN range and date of birth			
4. The customer fails to provide all required personal identifying information on an application or in response to notification that the application is incomplete			
5. Documents or information supplied appear to be forged or altered or destroyed and reassembled			
6. Customer unable to answer personal information correctly when challenged			
7. Information on ID such as signature is inconsistent with information on file or from document to document			
Suspicious Activity From Past Experience That Indicates Possible Identity Theft			
1.			
2.			
3.			
4.			
Step 2	Detect and note “Red Flags” that have been identified	Step 3	Response to “Red Flag” Identified
Example: Check to see that the address provided by the customer matches the address in their consumer credit report		Example: Verify the customer’s identity by requesting additional documents such as a Social Security card to match with the S.S.N. on the credit report or a current utility bill showing the customer’s current address	
1.		1.	
2.		2.	
3.		3.	
4.		4.	
5.		5.	
6.		6.	

Step 4	Administering Your Identity Theft Program
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Step A	Have your program reviewed and approved by your senior manager, Board of Directors or a committee of your Board of Directors.
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Our program has been approved by:	Name:
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Step B	Designate a senior employee to administer your Program
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The person who will administer our Program is:	Name:
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Step C	Review and Update the Red Flags Identity Theft Program periodically to reflect changes in risks from identity theft as needed.
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Mo./day/yr. of review	Make Note of Changes or Updates to Your Red Flags Identity Theft Program

Step D	Train staff, as necessary, to effectively implement the Red Flags Identity Theft Program
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Date	Employees Trained	Notes on Training (How were employees trained and what topics were covered)