

BRAINERD PUBLIC UTILITIES
POLICY 2008-14
Identity Theft Prevention Program Procedures

BPU has conducted an internal risk assessment to evaluate how at risk the current procedures are at allowing customers to create a fraudulent account and evaluate if current (existing) accounts are being manipulated. This risk assessment evaluated how new accounts were opened and the methods used to access the account information. Using the following information, BPU was able to identify the following red flags that were appropriate to prevent identity theft.

- New accounts opened in person
- New accounts opened via telephone
- New accounts opened via fax
- Existing account information accessed in person
- Existing account information accessed via telephone
- Existing account information accessed via web site

BPU adopts the following red flags to detect potential fraud. These are not intended to be all-inclusive and other suspicious activity may be investigated as necessary.

New Customers

- Fraud or active duty alerts included with consumer reports
- Notice of credit freeze provided by consumer reporting agency
- Notice of address discrepancy provided by consumer reporting agency
- Inconsistent activity patterns indicated by consumer reports such as
 - * Recent and significant increase in volume of inquiries
 - * Unusual number of recent credit applications
 - * A material change in use of credit
 - * Accounts closed for cause or abuse
 - * Identification documents appear to be altered
 - * Photo and physical description do not match appearance of applicant
 - * Other information is inconsistent with information provided by applicant
 - * Other information provided by applicant is inconsistent with information on file
 - * Application appears altered or destroyed and reassembled
 - * Personal information provided by applicant does not match other sources of information (e.g. credit reports, SSN not issued or listed as deceased)
 - * Lack of correlation between the SSN range and date of birth
 - * Information provided is associated with known fraudulent activity (e.g. address or phone number provided is same as that of a fraudulent application)
 - * Information commonly associated with fraudulent activity is provided by applicant (e.g. address that is a mail drop or prison, non-working phone number or associated with answering service/pager)
 - * SSN, address, or telephone number is the same as that of other customer at BPU
 - * Customer fails to provide all information that is requested on application
 - * Personal information provided is inconsistent with information on file for a customer
 - * Applicant cannot provide information requested beyond what could commonly be found in a purse or wallet
 - * Identity theft is reported or discovered

Existing Customers

- Verify the identification of customers if they request information (in person, via telephone, via fax, via email)
- Verify the validity of requests to change billing address
- Verify changes in banking information given for billing and payment purposes

Response to Red Flags

Any employee that may suspect fraud or detect a red flag will implement the following response as applicable.

- Ask applicant for additional documentation
- Any BPU employee who becomes aware of a suspected or actual fraudulent use of a customer or potential customer's identity must notify the Accounting Supervisor or Finance Director.
- Notify law enforcement - BPU will notify the Brainerd Police Department of any attempted or actual identity theft.
- Do not open the account
- Close the account
- Do not attempt to collect against the account, but notify authorities