

**RESOLUTION NO. 2446**

**EAST NORRITON TOWNSHIP  
MONTGOMERY COUNTY, PENNSYLVANIA**

**A RESOLUTION ADOPTING RULES AND REGULATIONS  
FOR AN IDENTITY THEFT PROGRAM  
REQUIRED BY THE FEDERAL TRADE COMMISSION  
FOR ALL UTILITY SERVICES**

**WHEREAS**, East Norriton Township maintains utilities in its Township;

**WHEREAS**, the Federal Trade Commission has a new federal mandate, commonly known as the Red Flag Rule, that requires the development and implementation of rules and regulation where there is a risk of identity theft;

**WHEREAS**, the Red Flag Rule requires all utility providers, which includes East Norriton Township, to implement an identity theft program;

**WHEREAS**, East Norriton Township has to be in compliance with this program no later than May 1, 2009.

**NOW, THEREFORE, BE IT RESOLVED**, and it is hereby resolved by the Board of the Supervisors adopts an identity theft program as follows:

**Identity Theft Prevention Program  
For  
East Norriton Township  
2501 Stanbridge Street  
East Norriton, PA 19401  
\_\_\_\_\_ 2009**

This Program is intended to identify:

- Red flags that will alert our employees when new or existing accounts are opened using false information;
- Protect against the establishment of false accounts;
- Methods to ensure existing accounts were not opened using false information, and measures to respond to such events.

Contact Information:

The Senior Management Person responsible for this program is:

Title: Township Manager  
Phone number: 610-275-2800

## **Risk Assessment**

East Norriton Township 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 this information the utility was able to identify red flags that were appropriate to prevent identity theft.

- New accounts opened In Person;
  - New accounts opened via Telephone;
  - New accounts opened via Fax;
  - New accounts opened via Web;
  - Account information accessed In Person;
  - Account information accessed via Telephone (Person).
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## **Detection (Red Flags)**

East Norriton Township 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.

- 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;
- 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);
- Address or telephone # is the same as that of other customer for utility;
- Customer fails to provide all information requested;
- 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.

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**Response**

Any employee that may suspect fraud or detect a red flag will implement the following response as applicable. All detections or suspicious red flags shall be reported to the Township Manager.

- Ask applicant for additional documentation;
  - Notify the Township Manager: Any employee who becomes aware of a suspected or actual fraudulent use of a utility customer's identity must notify the Township Manager;
  - Notify law enforcement: The Township Manager or agent will notify the East Norriton Township Police at 610-275-2800 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.
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**Personal Information Security Procedures**

East Norriton Township adopts the following security procedures set forth in exhibit Appendix A.

**Identity Theft Prevention Program Review and Approval**

This plan has been reviewed and adopted by the East Norriton Township Board of Supervisors. Appropriate employees have been or will be trained on the contents and procedures of this Identity Theft Prevention Program.

**DULY PRESENTED AND ADOPTED** by the Board of Supervisors of East Norriton Township, Montgomery County, Pennsylvania, in Public Meeting this 24~~th~~ day of March, 2009.



BOARD OF SUPERVISORS  
EAST NORRITON TOWNSHIP

BY: Lewis K McJannets  
Chairman

ATTEST:

Helmut J. L. B. Buewald  
Secretary