

## Identity Theft Prevention Program Checklist for Program Development and Implementation

Date	Responsible Person	
_____	_____	Senior staff member gather program information to present Program requirements to Governing Body.
_____	_____	Governing Body or Mayor or City Manager with Council or Board ratification, through formal action _____ Forms Oversight Committee to develop, implement and comply with program requirements; and/or _____ Appoints Senior Administrator to develop, implement and comply with program requirements
_____	_____	Designated staff member completes Current Operation Assessment  Responsible person _____
_____	_____	Draft Program is developed and circulated among Oversight Committee members
_____	_____	Key Personnel, by job function, are identified. Key Personnel _____ _____ _____ _____
_____	_____	Based on Current Operational Assessment, Red Flag events which could occur during information intake and management of customer information are identified.
_____	_____	Immediate actions and mitigating actions are established for each Red Flag event identified.
_____	_____	Proposed Identity Theft Prevention Program (ITPP) is approved and implemented by Governing Body action.
_____	_____	In accordance with the Program, required training is provided to the following, _____ Oversight Committee members-all or _____ Senior Administrator _____ Key Supervisory Personnel _____ Key Personnel
_____	_____	The program is implemented with all elements in place in accordance with the adopted program guidelines.

## Identity Theft Prevention Program Semi-Annual Review and Annual Report

Date	Responsible Person	
_____	_____	<p>On or about 1 May 2009, Key Personnel will conduct a semi-annual review of the program. Review will cover, as a minimum,</p> <p>_____ Review and discussion regarding all Red Flag events that occurred during the previous six months, whether a loss of information occurred or not. Discussion will include identifying the particular event, immediate actions taken and actions taken to limit customer exposure or preventative measures for future events.</p> <p>_____ Review and discussion of current processes and procedures to determine if changes should be considered.</p> <p>_____ Upon staff review and developed action, written review material will be maintained and secured in accordance with established policy.</p>
_____	_____	<p>On or about 1 November 2009, Key Personnel will conduct a semi-annual review of the program. Review will cover, as a minimum,</p> <p>_____ Review and discussion regarding all Red Flag events that occurred during the previous six months, whether a loss of information occurred or not. Discussion will include identifying the particular event, immediate actions taken and actions taken to limit customer exposure or preventative measures for future events.</p> <p>_____ Review and discussion of current processes and procedures to determine if changes should be considered.</p> <p>_____ Upon staff review and developed action, written review material will be maintained and secured in accordance with established policy.</p>
_____	_____	<p>Within three days of the 1 November 2009 review, a written report will be submitted to the Governing Body, or the Oversight Committee as designated by the Governing Body. The report will summarize the Red Flag events that have occurred during the previous 12 month period, the actions taken, changes that have occurred within the program and/or recommendations of changes to the Program should such actions require Governing Body approval.</p>