

Timeline for Implementing the
Identity Theft Prevention Program

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| <i>Before November 1</i> | <ol style="list-style-type: none">1. Governing Body – [or Mayor, City Manager, or City Administrator; with Council or Board Ratification]<ol style="list-style-type: none">a. Forms Oversight Committeeb. Appoints Senior Staff to develop, implement and comply with program requirements2. Complete Operational Evaluation/Assessment (Available on AML website)3. Identify Red Flag events that could occur based on current operations for intake and management of customer information4. Revise or Develop policies and procedures to establish an Identity Theft Prevention Program (ITPP). (Sample policies available on AML website)<ol style="list-style-type: none">a. You may incorporate the required elements of the Act – specifically, the Operational Evaluation, potential Red Flag events, and staff training, semi-annual review, and annual report – into already existing information security policies and procedures5. Governing Body approves the ITPP6. Train identified, key personnel7. Implement the program |
| <i>After November 1</i> | <ol style="list-style-type: none">1. Operate the Program |
| <i>On or about May
(or 6 months after
ITPP has been approved)</i> | <ol style="list-style-type: none">2. Conduct a mid-year review of the Program's Operations<ol style="list-style-type: none">a. Conduct an Incident Review of all Red Flag events that occurred during the previous six months – to include actions taken immediately, actions taken to limit customer exposure, and other preventive measures taken |
| <i>On or about November
1, 2009</i> | <ol style="list-style-type: none">3. Conduct a mid-year review of the Program's operations<ol style="list-style-type: none">a. Conduct an Incident Review of all Red Flag events that occurred during the previous six months - to include actions taken immediately, actions taken to limit customer exposure, and other preventive measures taken4. Write the Annual Report to the Governing Body<ol style="list-style-type: none">a. Findings and actions taken during the year |