

MANDATED POLICIES

EXHIBIT "A"

IDENTITY THEFT PREVENTION PROGRAM

POLICY AND PROCEDURE

Policy: The Village of Cobden complies with the Fair and Accurate Credit Transactions (FACT) Act by:

- A. Defining Actions to be taken for each of the Red Flags which relate to the opening of new accounts and the monitoring of existing accounts.
 - 1. The Village of Cobden has developed the following procedures designed to detect, prevent and mitigate identity theft in connection with the opening of a covered account or any existing covered account. All procedures represent a typical but not absolute response. Each situation can and will have circumstances which will be affected by a number of variables.
 - 2. The Village of Cobden submits the following managerial responses as typical but not limited to:

Flag	Next Step	Mitigation (Steps to Control Losses)
Alerts		
Consumer report indicates Fraud or active duty alert.	Village currently does not use a Consumer Reporting Agency	If a pattern of identity theft instances occur, the Village will use services of a CRA.
Credit freeze.	Village currently does not use a Consumer Reporting Agency	If a pattern of identity theft instances occur, the Village will use services of a CRA.
Notice of address Discrepancy.	Village currently does not use a Consumer Reporting Agency	If a pattern of identity theft instances occur, the Village will use services of a CRA.
Unusual patterns in activity.	Village currently does not use a Consumer Reporting Agency	If a pattern of identity theft instances occur, the Village will use services of a CRA.
Presentation of Suspicious Documents		
Identification documents appear altered or forged.	Have Police Department review.	Do not open account until Cleared by Police Department.
Photo/physical description does not match applicant.	Do not open account.	
Other information on identification is inconsistent information given by applicant.	Ask for explanation of inconsistency.	If explanation is not satisfactory, Do not open account until approved by Program Administrator.
Information in utility files is inconsistent with information provided. Example – signatures do not match in signature card.	Ask for explanation of inconsistency.	If explanation is not satisfactory, Do not open account until approved by Program Administrator.
Application looks altered or forged or destroyed and reassembled.	Request that application be completed in front of office personnel.	If request refused, do not open account.

Suspicious Personal Identifying Information		
<p>Identification is inconsistent with external source such as:</p> <ul style="list-style-type: none"> - Address v address on Consumer Report - Social Security Number not issued - Social Security Number on Death Master file - Inconsistent information, such as lack of correlation between date of birth and Social Security number 	<p>Village currently does not use a Consumer Reporting Agency.</p>	
<p>Identification is known to be associated with fraudulent activity:</p> <ul style="list-style-type: none"> - The address is fictitious, a prison or a mail drop on application - The phone number is invalid or associated with a pager or answering service - The Social Security number is the same as that submitted by other persons opening an account - The address is the same address as that submitted by other persons opening account 	<p>Request verification of phone number, Social Security number or address.</p>	<p>If verification is not satisfactory, do not open account.</p>
<p>Applicant fails to provide all personal ID requested.</p>	<p>Do not open account.</p>	
<p>For institutions using challenge questions, the person attempting to access or open account cannot provide any information beyond what would typically be found in a wallet or consumer report.</p>	<p>The Village does not use challenge questions at this time.</p>	
<p>Change of billing address if followed by request for adding additional properties to the account (or shortly following the notification of a change in address, the utility receives a request for the addition of authorized users on the account.)</p>	<p>Each property is tied to a specific account – additional properties would not be added to an existing account.</p>	<p>If additional users are requested, all identification that is required for an initial opening of an account is required.</p>
<p>Payments are made in a manner associated with fraud. For example, deposit or initial payment is made and no payments are made thereafter.</p>	<p>Standard disconnection notices are sent.</p>	<p>Utilities are disconnected if no Payment is received.</p>
<p>Existing account with a stable history shows irregularities.</p>	<p>Account holder will be notified by telephone immediately.</p>	

Suspicious Personal Identifying Information		
An account with low activity unexpectedly jumps to high consumption.	Account holder will be notified by telephone immediately.	Service will be disconnected if requested by account holder.
Mail sent to customer is repeatedly returned.	Mail will be delivered to residence and hung on door.	Service will be discontinued if no payment received when due.
Customer notifies utility that they are not receiving their bill.	Mailing address will be verified.	If address is correct, Postmaster will be notified.
The utility is notified of unauthorized charges or transactions in connection with customer's account.	Customer will be advised to contact Police Department to report theft of services or discrepancy.	Service will be disconnected if requested by account holder.
Notice of Theft		
Utility is notified by law officials or others, that it has opened a fraudulent account for a person engaged in identity theft.	Local law officials will be notified.	Village will follow advice of law enforcement officials. Service will be disconnected if requested by property owner.

- B. Preventing, Detecting and Mitigating Breaches in Security.
 - 1. In the event of a breach of security, the following precautions will be taken to mitigate damage:
 - a. Customer affected will be notified immediately by telephone with a written follow-up.
 - 2. Notification within the utility will follow:
 - a. Other office personnel
 - b. Village President
 - c. Police Department
 - d. Utility Superintendent
 - 3. Customers affected by the breach will be contacted immediately by first class mail.
- C. Responding to Notices of Address Discrepancies
 - 1. The Village of Cobden will furnish a confirmed address to the consumer reporting agency (CRA) under the following conditions:
 - a. Village can form a reasonable belief the consumer report relates to the consumer about whom the user requests the report.
 - b. The consumer under review is a current customer with an active account.
 - c. Request involves a customer opening a new account.
 - d. CRA provides request in writing.
 - e. Utility has established relationship with CRA. (Note: The Village is not currently established with a CRA.)
- D. Providing Designated Employees with Identity Theft Prevention Training
 - 1. Designated employees will be trained on a need to know basis according to job responsibilities.
 - 2. Initial training will address the procedures for safeguarding secured information.
 - 3. Annual update will be provided for all designated employees. Sessions will include, but not be limited to, patterns of incidents, changes in information technology, changes in methods of identity theft, and seeking employee input on strategies for enhancing Identity Theft Prevention Program.
 - 4. Documentation of Training will be notated in each trained employee's personnel file.
 - 5. New employees hired into positions handling secured information will receive initial training within five days of date of employment.

- E. Handling Reports of Suspected Identity Theft
1. When a consumer suspects identity theft, he must notify the Village in writing, completing the Federal Trade Commission Affidavit. Instructions for completing are a part of the form. (A sample form is included in this policy.)
 2. Customer will be requested to submit copy of affidavit with police report.
 3. Make a copy of the customer's photo ID.
 4. Record the receipt of documents. (Copy of recording form attached.)
 5. Submit the copies of the FTC affidavit, police report and photo ID to Program Administrator.
 6. Village will notify consumer of any requested changes or abnormalities in consumer's account.
- F. Conducting IT Audits to Monitor Risk for Identity Theft
1. The Village of Cobden will utilize the Identity Theft Prevention Program Checklist to audit and evaluate internal and external identity theft risk in information technology security.
 2. Walk through inspections will be completed on a semi-annual basis by the Program Administrator and complete audits will be completed on a yearly basis by the Program Administrator.
 3. Recommendations to reduce risk of identity theft will be submitted for program review and evaluation upon completion of an audit checklist. Results will be submitted to the privacy officer within five days of completion of the evaluation.
- G. Confidentiality of Medical Records
1. The Village of Cobden will treat all medical information pertaining to the customer as confidential.
 - a. Definition:

Medical information is information or data, whether oral or recorded, in any form of medium, created by or derived from a health care provider or the consumer that relates to:

 - The past, present or future physical, mental, or behavioral health care to an individual;
 - The provision of health care to an individual; or
 - The payment for the provision of health care to an individual
 2. Medical information will not be used in the determination of a consumer's eligibility for services.
 3. The Village of Cobden will not release medical information to third parties.
 4. Rescue squads, government entities that require the location of citizens on ventilators for planning purposes will be provided the information upon the written permission of the customer.
- H. Disposal of Records
1. The Village of Cobden will collect and protect documents and data until the time of destruction.
 - a. Paper. The exposure of customer secured information in the office will be monitored.
 - Employee notes from opening a new account will be shredded immediately using shredders located next to trash can and near copier.
 - Faxes with secured information will be filed in a locked file cabinet in a locked storage room.
 - In accordance with FTC recommendations, records will be cross-shredded.
 - b. Electronic. Secured information will not be entered into computers.
 - c. CD's. CD's will be broken when new back up is completed.
 2. The Village of Cobden follows recommendations and procedures set forth by the Illinois State Archives Local Records Unit.

PROCEDURE FOR OPENING NEW ACCOUNT

- I. New utility accounts may be opened in the following manner:
 - In person walk-in

- II. Information and Documentation Required for Walk-in (potential customer to open new account)
 - Driver's license or alternate government issued picture ID (required)
 - Second form of identification, such as credit card (required)
 - New service address (required)
 - New service telephone number (if connected, if not cell phone number)
 - Most recent previous address (required)
 - Name, address and telephone number of landlord (required)
 - Signature on application (required)

- III. Steps to be Taken by Office Personnel
 - a. Check driver's license/alternate government ID.
 - b. Compare signature on application with signature on driver's license and second form of ID.
 - c. Review checklist of Red Flags – determine if any present.
 - d. Make a copy of driver's license/alternate government ID.

- IV. Steps for Office Personnel to Follow if Validation of ID Fails
 - a. Tactfully advise potential customer of the issue, if appropriate.
 - b. Do not open account.
 - c. Refer customer to external source that is the source of the Red Flag (i.e., SSN Master File)
 - d. Escalation to supervisor if situation with customer unresolved.
 - e. Program Administrator to make final decision at his/her discretion whether to open account.

REPORTS OF SUSPECTED IDENTITY THEFT

1. When a consumer suspects identity theft, he must notify the Village in writing, completing the Federal Trade Commission Affidavit. Instructions for completing are a part of the form. (A sample form is included in this policy.)
2. Customer will be requested to submit copy of affidavit with police report.
3. Make a copy of the customer's photo ID.
4. Record the receipt of documents.
5. Submit the copies of the FTC affidavit, police report and photo ID to Program Administrator.
6. Village will notify consumer of any requested changes or abnormalities in consumer's account.

Document	Date Received	Received by
Federal Trade Commission Affidavit		
Customer's Photo ID		
Police Report (with above documents attached)		

Document	Date Submitted to Program Administrator	Received by
Police Report (with above documents attached)		

INSTRUCTIONS FOR COMPLETING THE ID THEFT AFFIDAVIT

To make certain that you do not become responsible for any debts incurred by an identity thief, you must prove to each of the companies where accounts were opened in your name that you didn't create the debt. The ID Theft Affidavit was developed by a group of credit grantors, consumer advocates, and attorneys at the Federal Trade Commission (FTC) for this purpose. Importantly, this affidavit is only for use where a new account was opened in your name. If someone made unauthorized charges to an existing account, call the company for instructions.

While many companies accept this affidavit, others require that you submit more or different forms. Before you send the affidavit, contact each company to find out if they accept it. If they do not accept the ID Theft Affidavit, ask them what information and/or documentation they require.

You may not need the ID Theft Affidavit to absolve you of debt resulting from identity theft if you obtain an Identity Theft Report. We suggest you consider obtaining an Identity Theft Report where a new account was opened in your name. An Identity Theft Report can be used to (1) permanently block fraudulent information from appearing on your credit report; (2) ensure that debts do not reappear on your credit reports; (3) prevent a company from continuing to collect debts or selling the debt to others for collection; and (4) obtain an extended fraud alert.

The ID Theft Affidavit may be required by a company in order for you to obtain applications or other transaction records related to the theft of your identity. These records may help you prove that you are a victim. For example, you may be able to show that the signature on an application is not yours. These documents also may contain information about the identity thief that is valuable to law enforcement.

This affidavit has two parts:

- Part One – the ID Theft Affidavit – is where you report general information about yourself and the theft.
- Part Two – the Fraudulent Account Statement – is where you describe the fraudulent account(s) opened in your name. Use a separate Fraudulent Account Statement for each company you need to write to.

When you send the affidavit to the companies, attach copies (NOT originals) of any supporting documents (for example, driver's license or police report). Before submitting your affidavit, review the disputed account(s) with family members or friends who may have information about the account(s) or access to them.

Complete this affidavit as soon as possible. Many creditors ask that you send it within two weeks. Delays on your part could slow the investigation.

Be as accurate and complete as possible. You may choose not to provide some of the information requested. However, incorrect or incomplete information will slow the process of investigating your claim and absolving the debt. Print clearly.

When you have finished completing the affidavit, mail a copy to each creditor, bank, or company that provided the thief with the unauthorized credit, goods, or services you describe. Attach a copy of the Fraudulent Account Statement with information only on accounts opened at the institution to which you are sending the packet, as well as any other supporting documentation you are able to provide.

Send the appropriate documents to each company by certified mail, return receipt requested, so you can prove that it was received. The companies will review your claim and send you a written response telling you the outcome of their investigation. Keep a copy of everything you submit.

If you are unable to complete the affidavit, a legal guardian or someone with power of attorney may complete it for you. Except as noted, the information you provide will be used only by the company to process your affidavit, investigate the events you report, and help stop further fraud. If this affidavit is requested in a lawsuit, the company might have to provide it to the requesting party. Completing this affidavit does not guarantee that the identity thief will be prosecuted or that the debt will be cleared.

If you haven't already done so, report the fraud to the following organizations:

1. Any one of the nationwide consumer reporting companies to place a fraud alert on your credit report. Fraud alerts can help prevent an identity thief from opening any more accounts in your name. The company you call is required to contact the other two, which will place an alert on their versions of your report, too.

Equifax: 1-800-525-6285; www.equifax.com

Experian: 1-888-EXPERIAN (397-3742); www.experian.com

TransUnion: 1-800-680-7289; www.transunion.com

In addition, once you have placed a fraud alert, you're entitled to order one free credit report from each of the three consumer reporting companies, and, if you ask, they will display only the Last four digits of your Social Security number on your credit reports.

2. The security or fraud department of each company where you know, or believe, accounts have been tampered with or opened fraudulently. Close the accounts. Follow up in writing, and include copies (NOT originals) of supporting documents. It's important to notify credit card companies and banks in writing. Send your letters by certified mail, return receipt requested, so you can document what the company received and when. Keep a file of your correspondence and enclosures.

When you open new accounts, use new Personal Identification Numbers (PINs) and passwords. Avoid using easily available information like your mother's maiden name, your birth date, the last four digits of your Social Security number, your phone number, or a series of consecutive numbers.

3. Your local police or the police in the community where the identity theft took place. Provide a copy of your ID Theft Complaint filed with the FTC (see below), to be incorporated into the police report. Get a copy of the police report or, at the very least, the number of the report. It can help you deal with creditors who need proof of the crime. If the police are reluctant to take your report, ask to file a "Miscellaneous Incidents" report, or try another jurisdiction, like your state police. You also can check with your state Attorney General's office to find out if state law requires the police to take reports for identity theft. Check the Blue Pages or your telephone directory for the phone number or check www.naag.org for a list of state Attorneys General.

4. The Federal Trade Commission. By sharing your identity theft complaint with the FTC, you will provide important information that can help law enforcement officials across the nation track down identity thieves and stop them. The FTC also can refer victims' complaints to other government agencies and companies for further action, as well as investigate companies for violations of laws that the FTC enforces.

You can file a complaint online at www.consumer.gov/idtheft. If you don't have internet access, call the FTC's Identity Theft Hotline, toll-free: 1-877-IDTHEFT (438-4338); TTY: 1-866-653-4261; or write: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580. When you file an ID Theft Complaint with the FTC online, you will be given the option to print a copy of your ID Theft Complaint. You should bring a copy of the printed ID Theft Complaint with you to the police to be incorporated into your police report. The ID Theft Complaint, in conjunction with the police report, can create an Identity Theft Report that will help you recover more quickly. The ID Theft Complaint provides the supporting details necessary for an Identity Theft Report, which go beyond the details of a typical police report.

**DO NOT SEND AFFIDAVIT TO THE FTC OR ANY OTHER
GOVERNMENT AGENCY**

Name _____ Phone Number _____ Page 1

ID Theft Affidavit

Victim Information

(1) My full legal name is _____
(First) (Middle) (Last) (Jr., Sr., III)

(2) (If different from above) When the events described in this affidavit took place, I was known as _____
(First) (Middle) (Last) (Jr., Sr., III)

(3) My date of birth is _____
(day/month/year)

(4) My Social Security number is _____

(5) My driver's license or identification card state and number are _____

(6) My current address is _____
City _____ State _____ Zip Code _____

(7) I have lived at this address since _____
(month/year)

(8) (If different from above) When the events described in this affidavit took place, my address was _____
City _____ State _____ Zip Code _____

(9) I lived at the address in Item 8 from _____ until _____
(month/year) (month/year)

(10) My daytime telephone number is (____) _____
My evening telephone number is (____) _____

**DO NOT SEND AFFIDAVIT TO THE FTC OR ANY OTHER
GOVERNMENT AGENCY**

Name _____ Phone Number _____ Page 2

How the Fraud Occurred

Check all that apply for items 11-17:

- (11) I did not authorize anyone to use my name or personal information to seek money, credit, loans, goods or services described in this report.
- (12) I did not receive any benefit, money, goods or services as a result of the events described in this report.
- (13) My identification documents (for example, credit cards; birth certificate; driver's license; Social Security card; etc.) were stolen lost on or about _____
(day/month/year)
- (14) To the best of my knowledge and belief, the following person(s) used my information (for example, my name, address, date of birth, existing account numbers, Social Security number, mother's maiden name, etc.) or identification documents to get money, credit, loans, goods or services without my knowledge or authorization:

Name (if known)

Address (if known)

Phone number(s) (if known)

Additional information (if known)

Name (if known)

Address (if known)

Phone number(s) (if known)

Additional information (if known)

- (15) I do NOT know who used my information or identification documents to get money, credit, loans, goods or services without my knowledge or authorization.
- (16) Additional comments: (For example, description of the fraud, which documents or information were used or how the identity thief gained access to your information.)

(Attach additional pages as necessary.)

DO NOT SEND AFFIDAVIT TO THE FTC OR ANY OTHER GOVERNMENT AGENCY

Name _____ Phone Number _____ Page 3

Victim's Law Enforcement Actions

- (17) (check one) I am am not willing to assist in the prosecution of the person(s) who committed this fraud.
- (18) (check one) I am am not authorizing the release of this information to law enforcement for the purpose of assisting them in the investigation and prosecution of the person(s) who committed this fraud.
- (19) (check all that apply) I have have not reported the events described in this affidavit to the police or other law enforcement agency. The police did did not write a report. In the event you have contacted the police or other law enforcement agency, please complete the following:

(Agency #1)

 (Date of report)

 (Phone number)

 (Officer/Agency personnel taking report)

 (Report number, if any)

 (email address, if any)

(Agency #2)

 (Date of report)

 (Phone number)

 (Officer/Agency personnel taking report)

 (Report number, if any)

 (email address, if any)

Documentation Checklist

Please indicate the supporting documentation you are able to provide to the companies you plan to notify. Attach copies (NOT originals) to the affidavit before sending it to the companies.

- (14) A copy of a valid government-issued photo-identification card (for example, your driver's license, state-issued ID card or your passport). If you are under 16 and don't have a photo-ID, you may submit a copy of your birth certificate or a copy of your official school records showing your enrollment and place of residence.
- (21) Proof of residency during the time the disputed bill occurred, the loan was made or the other event took place (for example, a rental/lease agreement in your name, a copy of a utility bill or a copy of an insurance bill).

DO NOT SEND AFFIDAVIT TO THE FTC OR ANY OTHER GOVERNMENT AGENCY

Name _____ **Phone Number** _____ **Page 4**

- (22) A copy of the report you filed with the police or sheriff's department. If you are unable to obtain a report or report number from the police, please indicate that in Item 19. Some companies only need the report number, not a copy of the report. You may want to check with each company.

Signature

I certify that, to the best of my knowledge and belief, all the information on and attached to this affidavit is true, correct, and complete and made in good faith. I also understand that this affidavit or the information it contains may be made available to federal, state, and/or local law enforcement agencies for such action within their jurisdiction as they deem appropriate. I understand that knowingly making any false or fraudulent statement or representation to the government may constitute a violation of 18 U.S.C. § 1001 or other federal, state, or local criminal statutes, and may result in imposition of a fine or imprisonment or both.

(signature)

(date signed)

(Notary)

[Check with each company. Creditors sometimes require notarization. If they do not, please have one witness (non-relative) sign below that you completed and signed this affidavit.]

Witness:

(signature)

(printed name)

(date)

(telephone number)

**DO NOT SEND AFFIDAVIT TO THE FTC OR ANY OTHER
GOVERNMENT AGENCY**

Name _____ Phone Number _____ Page 5

Fraudulent Account Statement

Completing this Statement

- Make as many copies of this page as you need. **Complete a separate page for each company you're notifying and only send it to that company.** Include a copy of your signed affidavit.
- List only the account(s) you're disputing with the company receiving this form. **See the example below.**
- If a collection agency sent you a statement, letter or notice about the fraudulent account, attach a copy of that document (**NOT** the original).

I declare (check all that apply):

- As a result of the event(s) described in the ID Theft Affidavit, the following account(s) was/were opened at your company in my name without my knowledge, permission or authorization using my personal information or identifying documents:

Creditor Name/Address (the company that opened the account or provided the goods or services)	Account Number	Type of unauthorized credit/goods/services provided by creditor (if known)	Date issued or opened (if known)	Amount/Value provided (the amount charged or the cost of the goods/ services)
Example Example National Bank 22 Main Street Columbus, Ohio 22722	01234567-89	auto loan	01/05/2002	\$25,500.00

- During the time of the accounts described above, I had the following account open with your company:

Billing name _____

Billing address _____

Account number _____

**DO NOT SEND AFFIDAVIT TO THE FTC OR ANY OTHER
GOVERNMENT AGENCY**

**CHECKLIST TO OPEN NEW ACCOUNT
OR CHANGE EXISTING ACCOUNT**

- Utility accounts can only be opened in person.
- The following documents are REQUIRED – no exceptions.

Applicant's Name:

Identification Item	Number	Copy Attached
Driver's License/government issued ID		

Identifying Information: The term "identifying information" means any name or number that may be used, alone or in conjunction with any other information, to identify a specific person, including any name, social security number, date of birth, official State or government issued driver's license or identification number, alien registration number, government passport number, employer or taxpayer identification number.

Identification Item	Type of ID	Number
Second form of ID		

New Service Address	
House # _____	Street Name: _____
City, State, Zip Code: _____	

New Mailing Address
Street Address or P.O. Box _____
City, State, Zip Code: _____

New Service Telephone Number
If no service telephone number, cell # or other contact #: _____

Most Recent Previous Address
Street Address: _____
Mailing Address: _____
City, State, Zip Code: _____

If rental property, landlord information:
The landlord/property owner will be notified by mail that you are applying for service at above residence.
Name of Landlord: _____
Telephone Number: _____
Street or Mailing Address: _____
City, State, Zip Code: _____

Applicant's Signature: _____	Date: _____
Employee Signature: _____	Date: _____

Village of Cobden
"The Home of the Appleknockers"
112 East Maple Street
PO Box 218
Cobden, IL 62920-0218
Telephone: (618) 893-2425
FAX: (618) 893-2853
knocker@shawneelink.net

Notice of Application for Service

To: _____

Address: _____

This is to inform you that _____ has applied for utility service at your property located at _____.

Following is an excerpt from the Village's Code of Ordinances:

38-2-2 LIABILITY FOR CHARGES. The owner of any lot, parcel of land or premises receiving utility services, the occupant of such premises and the user of the services shall be jointly and severally liable for the payment of the services to such lot, parcel of land or premises and all services are rendered to the premises by the Village only on the condition that such owner, occupant, and user shall be jointly and severally liable therefore to the Village. (765 ILCS 735/5) (#277; 10/12/66)

If you are not aware of this application for service, please contact us immediately.

Signature of Village Employee

Date