

EXCHANGE ANALYTICS INC.

Identity Theft Prevention Training Course Outline

- I. Overview of the Problem of Identity Theft
- II. Statutory Background Requiring the Protection of Identity and Customer Information
 - a. Fair Credit Reporting Act of 1970
 - b. Fair and Accurate Credit Transactions Act of 2003
 - c. FTC Red Flag Rules 2007
 - d. Dodd-Frank 2010
 - e. CFTC-SEC Red Flag Rules 2013
- III. Protecting Customer Information
- IV. Phishing Scams
- V. Applicability of Red Flag Rules to Financial Institutions
- VI. Covered and Indirect Covered Accounts
- VII. Elements of an Identity Theft Prevention Program (ITPP)
 - a. Policies and Procedures to Identify Relevant Red Flags
 - b. Policies and Procedures to Detect Red Flags
 - c. Policies and Procedures to Respond to Red Flags
 - d. Policies and Procedures to Update the Program
- VIII. Identifying Relevant Red Flags for the ITPP
- IX. Detecting and Responding to Red Flags
- X. Red Flags at Account Opening
 - a. Documentary ID
 - b. Non-Documentary ID
- XI. Suspicious Activity
 - a. Credit Reporting Agency Alerts or Discrepancies
 - b. Suspicious Personal Identifying Information (PII)
- XII. Red Flags and Concerns After Account Opening
 - a. Requests from Customers to Change Usual Wire Instructions
 - b. Change of Address
- XIII. Appropriate Internal Responses to Red Flags
- XIV. Reporting of Red Flags
- XV. Recovering Fraudulent Wire Transfers
- XVI. Updating and Administration of the ITPP
- XVII. Hypothetical Case Studies
- XVIII. Important Cases to Consider
- XIX. Quiz