

# **EXCHANGE ANALYTICS INC.**

## **2019 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