

# Identity Theft Prevention 2025

## Course Outline and Provider Qualifications

This course is designed to inform you of procedures that you and your firm can use to help identify, detect and respond to activity that may indicate a threat of identity theft or fraudulent activity related to account access. In accordance with the Identity Theft Red Flag Rules, certain financial institutions operating in the U.S. must maintain procedures designed to protect customer information and assets, as well as prevent and mitigate identity theft.

- I. Preface
  - a. Applicability to Financial Firms
  - b. Importance of Training
  - c. Importance of Identity Theft Prevention
  - d. The Prevalence of Identity Theft
  - e. Recent Examples of Notable Identity Theft
  - f. Fundamental Definitions
  - g. Course Goals
- II. Program Development, Implementation & Execution
  - a. Developing the Program
    - i. Program Requirements
    - ii. Guidance of Source of Red Flags
    - iii. Modern-Day Examples of Identity Theft Red Flags
    - iv. Categories of Red Flags
  - b. Implementation and Executing the Program
    - i. Red Flags – Category 1
      - 1. Notifications or Warnings from a Consumer Reporting Agency
      - 2. Suspicious Documents
      - 3. Suspicious Personal Identifying Information
      - 4. Unusual Use of, or Suspicious Activity Related to the Account
      - 5. Notice from Customers, Victims of Identity Theft, Law Enforcement Activities or Other Persons
  - c. Reminder on Illustrative Examples
  - d. Detecting Red Flags
  - e. Authentication of Customer Information for New Accounts
  - f. Procedures to Authenticate Customer Information
  - g. Verification of Address Change Requests
  - h. Preventing and Mitigating Identity Theft
    - i. Appropriate Responses to Red Flags
    - ii. Additional Responses

- iii. Specific Scenarios and Responsive Steps
  - iv. Unauthorized Access Procedures
  - v. Account Authentication After a Red Flag Has Been Detected
  - vi. Further Review and Reporting
- III. Program Maintenance & Governance
  - a. Methods for Administering the Program
    - i. Executive Level Reporting
    - ii. Periodic Reports to Management
    - iii. Oversight of Service Provider Arrangements
  - b. Updating the Program
    - i. Recent Enhancements to Criminal's Identity Theft Techniques
      - 1. Generative AI and Deepfake Technology
      - 2. Phishing-as-a-Service (PHaaS)
      - 3. Synthetic Identity Fraud
      - 4. SIM Swapping Attacks
      - 5. Crime-as-a-Service (CaaS)
      - 6. Account Takeover (ATO)
    - ii. Latest Advances in Prevention Technology and Techniques
      - 1. Biometric Authentication
      - 2. Advanced Encryption Standards
      - 3. AI-Driven Security Systems
      - 4. Real-Time Threat Detection
      - 5. Social Media Monitoring
      - 6. Multi-Factor Authentication (MFA)
  - c. Considering Other Legal Requirements
  - d. Overseeing the Program
    - i. Risk Assessment Factors
    - ii. Recordkeeping
    - iii. Staff Training
- IV. Enforcement Cases
- V. Quiz

## **Provider Qualifications - About the Author**

**Joseph Adamczyk** served as author. Prior to his affiliation with Exchange Analytics, he served as the Chief Compliance Officer for Options Clearing Corporation (OCC). Mr. Adamczyk oversaw the firm's compliance risk monitoring and governance programs, advised the board of directors and staff on compliance and regulatory requirements, and interacted with federal regulators on compliance, risk, and examination matters. Before joining OCC, Mr. Adamczyk worked at CME Group where he served as the Managing Director & Associate General Counsel overseeing the company's non-U.S. legal staff and activities. In this role, he interacted with regulators from around the globe. He also handled CME Group's interactions with U.S. regulators and other authorities on cybersecurity and technology controls, requirements, cyber incident response, and examinations. At CME Group, Mr. Adamczyk also served as the Global Head of Investigations and Enforcement in the Market Regulation Department. In that role, he oversaw teams responsible for monitoring, investigating, and enforcing the CME Group exchanges' trade practice rules and other requirements. Mr. Adamczyk received his MBA from the University of Chicago, law degree from Loyola University Chicago School of Law, and undergraduate degree from DePaul University. He has no regulatory actions or other disciplinary history.