

ID Theft-Checklist of Credit Union Responsibilities

The following ID theft checklist provides your credit union with key action steps to help you educate your members, implement appropriate internal control prevention measures, and provide victim assistance. Specific tools and resources mentioned in the checklist can be found in the online toolkits at www.cunamutual.com/IDtheft and www.cuna.org/initiatives/idtheft.html. Additional information regarding each of the checklist items can be found in the “Checklist Supplement” document in the online toolkit.

- Provide member education through newsletter articles or statement stuffers, advising members to:
 - Review credit reports annually
 - Shred confidential documents
 - Review all account statements promptly
 - Use secure mailboxes to send and receive mail
 - Use caution when asked for personal information over the phone or Internet
 - Be aware of current scam tactics such as “phishing” and spoofing
- Provide employee training on ID theft.
- Appoint a central contact person for members to deal with potential ID theft problems (as recommended by BITS).
- Accept the Federal Trade Commission (FTC) “uniform affidavit” for members to report ID theft.
- Employees know and follow procedures on how to advise a member who is a victim of ID theft. At a minimum, the victim should be advised to:
 - Place fraud alerts with credit bureaus
 - Check credit reports
 - Review accounts, use standard affidavit to report disputes
 - Close accounts that have been tampered with or opened fraudulently
 - File a police report (and keep a copy of the report for themselves)
 - File a complaint with the FTC
- Provide all ID theft victims a copy of the FTC brochure “When Bad Things Happen to Your Good Name”.
- Credit union Web site contains a section on ID theft information, or contains a prominently placed link to an outside source of information.
- Allow members to put a password on their accounts for inquiries or transactions.



- Have written procedures to provide security on telephone inquires and guard against pretext calling that include one of the following: authorization codes, caller ID, or callback procedures.
- If you allow any funds transfer requests that are not in-person (by phone, fax or email), have written security procedures that require a callback.
- If you offer an audio response system, the system uses a PIN that is not based on any portion of the member's Social Security Number.
- If you offer a home banking system, the system requires a password of at least 6 characters and avoids all use of any portion of member Social Security Numbers (including password resets or first-time activations).
- Written address change procedures that require one of the following:
 - A confirmation mailed to both the old and new addresses, plus a minimum 30-day waiting period before sending any new/replacement plastic cards, PINs or checks.
 - A positive confirmation with the member (at a verifiable phone number) before sending any new/replacement plastic cards, PINs or checks within 30 days of the address change.
- If you allow new member enrollment without a physical visit to a credit union location, use a third-party verification system (such as Primary Payment Systems® IDENTITYSM CHEK Web Service) to screen information supplied on new accounts. A third-party verification system is recommended for all new members.
- Written or automatic procedures to identify potential ID theft on new loan applications. At minimum, the procedures should include verifying the address, date of birth, and employer information on the application, matching the information to what's found on the credit report, and resolving any discrepancies.
- Before you grant any new loans, you have a process to verify identity and comply with any fraud alerts the member may have on his or her credit bureau profile.
- Registered to receive ongoing updates on education and ID theft issues through a trusted vehicle such as Credit Union National Association's *News Now*.

This checklist was created by the CUNA Mutual Group and Credit Union National Association (CUNA) based on their experience in the credit union and insurance market. Neither CUNA Mutual nor CUNA provide any warranties or guarantees with respect to the checklist, which is intended solely as a guide, not as legal advice. No coverage is provided by this checklist.