

Identity Theft Prevention Policy

Williston, Vermont

1. Title, Authority, and Purpose

This policy shall be known as the “Town of Williston Identity Theft Prevention Policy.” It has been adopted by the Town of Williston Selectboard pursuant to 24 V.S.A. §§ 872, 1121 and 1122

The purpose of this Policy is to establish an Identity Theft Prevention Program (“Program”) designed to detect, prevent, and mitigate identity theft in connection with the opening of a water and/or sewer account or an existing water and/or sewer account and to provide for continued administration of the Program in compliance with Part 681 of Title 16 of the Code of Federal Regulations implementing Sections 114 and 315 of the Fair Accurate Credit Transactions Act (FACTA) of 2003.

2. Definitions

For the purposes of this Policy, the following definitions apply:

- 2.1. Water and/or Sewer Account means an account established for payment of water and/or sewer service.
- 2.2. Credit means that water and/or sewer services are delivered in advance of payment for those services.
- 2.3. Creditor means the Water and Sewer departments of the Town of Williston.
- 2.4. Customer means a person that has an account with the Water and/or Sewer departments of the Town of Williston.
- 2.5. Department Personnel means all employees responsible for or involved in the process of opening a water and/or sewer account or accepting payment for a water and/or sewer account.
- 2.6. Identity theft means a fraud committed or attempted using the identifying information of another person without authority.
- 2.7. Person means a natural person, a corporation, government or governmental subdivision, or agency, trust, estate, partnership, cooperative, or association.

3. Identification of Identity Theft

Notification of the existence or possibility of identity theft, as reported by a customer, a victim of identity theft or a law enforcement authority, shall be considered identification of possible identity theft.

4. Detecting and Preventing Identity Theft

4.1. New Water and/or Sewer Accounts

In order to detect or prevent identity theft associated with the opening of a new water and/or sewer account, department personnel will continue to take the following steps to obtain and verify the identity of the person opening the account: Accounts will only be opened in the name of the owner of record of the property to be serviced by the account, as reported on the State of Vermont Property Transfer Report.

4.2. Existing Accounts:

If the possibility of identity theft in a water and/or sewer account is reported to the Water and/or Sewer departments of the Town of Williston, the Town of Williston and its personnel will cooperate fully with law enforcement agencies.

5. Preventing and Mitigating Identity Theft

If department personnel detect the possibility of identity theft, such personnel, after consultation with his/her supervisor, shall take one or more of the following appropriate responses commensurate with the degree of risk posed, in order to further prevent the likelihood of identity theft occurring with respect to water and/or sewer accounts:

- a. Continuing to monitor a water and/or sewer account for evidence of identity theft;
- b. Contacting the customer;
- c. Not opening a new water and/or sewer account;
- d. Closing an existing water and/or sewer account;
- e. Not attempting to collect on a water and/or sewer account;
- f. Notifying law enforcement; or
- g. Determining that no response is warranted under the particular circumstances.

6. Program Updates

The Williston Selectboard shall, as it deems necessary, review and update this program to reflect changes in risks to customers or to the safety and soundness of the department from identity theft based on the following factors:

- a. The department's experiences with identity theft;
- a. Changes in methods of identity theft;
- a. Changes in identity theft detection, prevention, and mitigation methods;
- a. Changes in the types of accounts that the department offers or maintains; and
- a. Changes in the department's business arrangements with other entities.

7. Program Administration.

The Williston Selectboard shall be responsible for the oversight of the program including:

- a. Program implementation,
- b. Reviewing reports prepared by staff regarding the detection, prevention, and mitigation of identity theft, and
- c. Approving material changes to the program as necessary to address changing identity theft risks.

8. **Staff Reports:** Department staff responsible for implementing the program shall report to the Williston Selectboard:
 - a. Any new service provider arrangements;
 - b. Significant incidents involving identity theft and management's response; and
 - c. Recommendations for material changes to the program.

9. **Staff Training:** The Williston Selectboard **OR** its authorized representative will train staff responsible for effectively implementing the program as necessary.

10. **Oversight of Service Provider Arrangements:** If the Williston Selectboard engages a service provider to perform an activity in connection with one or more water and/or sewer accounts, the Selectboard will review such arrangements in order to ensure that the service provider's activities are conducted in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of identity theft.

The foregoing Policy is hereby adopted by the Selectboard of the Town of Williston of Williston, Vermont, this 20th day of April and is effective as of this date until amended or repealed.

Adopted: April 20, 2009