

**EAST GOSHEN TOWNSHIP  
CHESTER COUNTY, PENNSYLVANIA**

**RESOLUTION NO. 09-51**

**IDENTITY THEFT PREVENTION POLICY**

**WHEREAS**, Pursuant to the Fair and Accurate Credit Transaction Act of 2003 (the “Act”), the Federal Trade Commission and other federal agencies have issued regulations that require creditors to develop, adopt and implement written identity theft prevention programs; and

**WHEREAS**, regulations require that creditors, which includes a municipality that provides utility service where payment for the utility service is deferred to a future day, must identify, detect and respond to patterns, practices or specific activities known as “red flags” that could indicate identity theft ; and

**WHEREAS**, the Township bills commercial property owners for sewer service in arrears pursuant to Section 188-10(b) of the East Goshen Township Code, therefore the Township is defined as a “creditor” under the Act and must adopt a written Identity Theft Protection Policy.

**BE IT RESOLVED THAT** the East Goshen Township Board of Supervisors Identity Theft Prevention Policy (Policy) shall be as follows:

1. Identification of Red Flags: The Township received notice from a customer, a victim of identity theft or a law enforcement agency that an account has been opened or used fraudulently.
2. Detecting Red Flags: If Township receives notice that a customer’s identity may have been stolen by using the information obtained by the Township in opening or processing a sewer account, the Township Utility Coordinator or Manager will contact the complaining customer and perform an investigation to determine the basis for the complaint.
3. Responding to Red Flags: Township Utility Coordinator or Manager will prepare a report of his or her investigation and file the report with the Board of Supervisors and if necessary the Township Police Department.
4. Administering the Program: Township Manger shall annually review the Policy to determine if it continues to be in compliance with the Act. Appropriate revisions will be made based on changes in federal law or if there are changes in the way that the Township administers sewer accounts where fees are collected in arrears.

RESOLVED AND ADOPTED, this 21<sup>ST</sup> day of July, 2009.

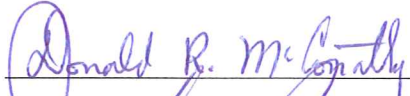
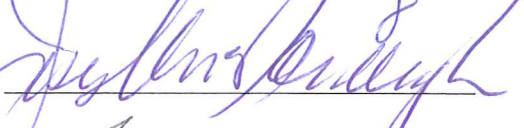
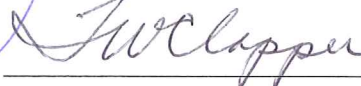
ATTEST:

  
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Secretary

EAST GOSHEN TOWNSHIP  
BOARD OF SUPERVISORS

  
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