

\_\_\_\_\_ Credit Union

**F.A.C.T. Act Identity Theft "Red Flags"  
Program Risk Assessment Matrix**

**Completed:**

**By:**

|    | A                                                  | B            | C      | D         | E            | F      | G         | H            | I         | J           | K          | L          | M          |
|----|----------------------------------------------------|--------------|--------|-----------|--------------|--------|-----------|--------------|-----------|-------------|------------|------------|------------|
| 1  | Credit Union                                       |              |        |           |              |        |           |              |           |             |            |            |            |
| 2  | Identity Theft "Red Flags" Program Risk Assessment |              |        |           |              |        |           |              |           |             |            |            |            |
| 3  |                                                    |              |        |           |              |        |           |              |           |             |            |            |            |
| 4  | Account Risk Analysis                              |              |        |           |              |        |           |              |           |             |            |            |            |
| 5  |                                                    |              |        |           |              |        |           |              |           |             |            |            |            |
| 6  |                                                    |              |        |           |              |        |           |              |           |             |            |            |            |
| 7  | Access Methods                                     |              |        |           |              |        |           | Account Risk |           |             |            |            |            |
| 8  |                                                    | Face to Face | Online | Telephone | Face to Face | Online | Telephone |              | Financial | Operational | Compliance | Reputation | Litigation |
| 9  | Member Accounts                                    |              |        |           |              |        |           |              |           |             |            |            |            |
| 10 | Share savings                                      |              |        |           |              |        |           |              |           |             |            |            |            |
| 11 | Share Draft                                        |              |        |           |              |        |           |              |           |             |            |            |            |
| 12 | Share Certificate                                  |              |        |           |              |        |           |              |           |             |            |            |            |
| 13 | Club Savings                                       |              |        |           |              |        |           |              |           |             |            |            |            |
| 14 | Custodial Savings                                  |              |        |           |              |        |           |              |           |             |            |            |            |

|    | A                              | B            | C      | D         | E            | F      | G         | H            | I         | J           | K          | L          | M          |
|----|--------------------------------|--------------|--------|-----------|--------------|--------|-----------|--------------|-----------|-------------|------------|------------|------------|
| 15 | Access Methods                 |              |        |           |              |        |           | Account Risk |           |             |            |            |            |
| 16 |                                | Face to Face | Online | Telephone | Face to Face | Online | Telephone |              | Financial | Operational | Compliance | Reputation | Litigation |
| 17 | Member Accounts                |              |        |           |              |        |           |              |           |             |            |            |            |
| 18 | Safe Deposit Box               |              |        |           |              |        |           |              |           |             |            |            |            |
| 19 | Individual Retirement Accounts |              |        |           |              |        |           |              |           |             |            |            |            |
| 20 | Health Savings Accounts        |              |        |           |              |        |           |              |           |             |            |            |            |
| 21 | Trust Accounts                 |              |        |           |              |        |           |              |           |             |            |            |            |
| 22 |                                |              |        |           |              |        |           |              |           |             |            |            |            |
| 23 |                                |              |        |           |              |        |           |              |           |             |            |            |            |

|    | A                                                              | B            | C      | D         | E            | F      | G         | H | I         | J           | K          | L          | M          |
|----|----------------------------------------------------------------|--------------|--------|-----------|--------------|--------|-----------|---|-----------|-------------|------------|------------|------------|
| 24 | <div> <div>Access Methods</div> <div>Account Risk</div> </div> |              |        |           |              |        |           |   |           |             |            |            |            |
| 25 |                                                                | Face to Face | Online | Telephone | Face to Face | Online | Telephone |   | Financial | Operational | Compliance | Reputation | Litigation |
| 26 | Member Loans                                                   |              |        |           |              |        |           |   |           |             |            |            |            |
| 27 | Term Loans                                                     |              |        |           |              |        |           |   |           |             |            |            |            |
| 28 | Lines of Credit                                                |              |        |           |              |        |           |   |           |             |            |            |            |
| 29 | Real Estate Term Loans                                         |              |        |           |              |        |           |   |           |             |            |            |            |
| 30 | Real Estate Lines of Credit                                    |              |        |           |              |        |           |   |           |             |            |            |            |
| 31 | Credit Cards                                                   |              |        |           |              |        |           |   |           |             |            |            |            |
| 32 | Indirect Loans                                                 |              |        |           |              |        |           |   |           |             |            |            |            |

|    | A                                                 | B            | C      | D         | E            | F      | G         | H | I         | J           | K          | L          | M          |
|----|---------------------------------------------------|--------------|--------|-----------|--------------|--------|-----------|---|-----------|-------------|------------|------------|------------|
| 33 | <div>Access Methods</div> <div>Account Risk</div> |              |        |           |              |        |           |   |           |             |            |            |            |
| 34 |                                                   | Face to Face | Online | Telephone | Face to Face | Online | Telephone |   | Financial | Operational | Compliance | Reputation | Litigation |
| 35 | Member Business Accounts                          |              |        |           |              |        |           |   |           |             |            |            |            |
| 36 | Share Savings                                     |              |        |           |              |        |           |   |           |             |            |            |            |
| 37 | Share Draft                                       |              |        |           |              |        |           |   |           |             |            |            |            |
| 38 | Share Certificate                                 |              |        |           |              |        |           |   |           |             |            |            |            |
| 39 |                                                   |              |        |           |              |        |           |   |           |             |            |            |            |
| 40 |                                                   |              |        |           |              |        |           |   |           |             |            |            |            |
| 41 |                                                   |              |        |           |              |        |           |   |           |             |            |            |            |

|    | A                                      | B            | C      | D         | E            | F      | G         | H            | I         | J           | K          | L          | M          |
|----|----------------------------------------|--------------|--------|-----------|--------------|--------|-----------|--------------|-----------|-------------|------------|------------|------------|
| 42 | Access Methods                         |              |        |           |              |        |           | Account Risk |           |             |            |            |            |
|    |                                        | Face to Face | Online | Telephone | Face to Face | Online | Telephone |              | Financial | Operational | Compliance | Reputation | Litigation |
| 44 | Member Business Loans                  |              |        |           |              |        |           |              |           |             |            |            |            |
| 45 | GBSA Term Loans                        |              |        |           |              |        |           |              |           |             |            |            |            |
| 46 | GBSA Lines of Credit                   |              |        |           |              |        |           |              |           |             |            |            |            |
| 47 | Commercial Real Estate Term Loans      |              |        |           |              |        |           |              |           |             |            |            |            |
| 48 | Commercial Real Estate Lines of Credit |              |        |           |              |        |           |              |           |             |            |            |            |
| 49 | Credit Cards                           |              |        |           |              |        |           |              |           |             |            |            |            |
| 50 |                                        |              |        |           |              |        |           |              |           |             |            |            |            |

|    | A                                                         | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|----|-----------------------------------------------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 1  | Credit Union                                              |               |                     |                   |                      |                           |                  |                               |                        |                |
| 2  | Identity Theft "Red Flags" Program Risk Assessment Matrix |               |                     |                   |                      |                           |                  |                               |                        |                |
| 3  |                                                           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 4  | Red Flags Analysis - Member Accounts                      |               |                     |                   |                      |                           |                  |                               |                        |                |
| 5  |                                                           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 6  |                                                           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 7  | Member Account Type                                       | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 8  | Credit union defined risks                                |               |                     |                   |                      |                           |                  |                               |                        |                |
| 9  | ✓                                                         |               |                     |                   |                      |                           |                  |                               |                        |                |
| 10 | RESPONSE:                                                 |               |                     |                   |                      |                           |                  |                               |                        |                |
| 11 |                                                           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 12 | ✓                                                         |               |                     |                   |                      |                           |                  |                               |                        |                |
| 13 | RESPONSE:                                                 |               |                     |                   |                      |                           |                  |                               |                        |                |
| 14 |                                                           |               |                     |                   |                      |                           |                  |                               |                        |                |

|    | A                   | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|----|---------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 7  | Member Account Type | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 15 | ✓                   |               |                     |                   |                      |                           |                  |                               |                        |                |
| 16 | RESPONSE:           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 17 |                     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 18 | ✓                   |               |                     |                   |                      |                           |                  |                               |                        |                |
| 19 | RESPONSE:           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 20 |                     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 21 | ✓                   |               |                     |                   |                      |                           |                  |                               |                        |                |
| 22 | RESPONSE:           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 23 |                     |               |                     |                   |                      |                           |                  |                               |                        |                |

|    | A                   | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|----|---------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 7  | Member Account Type | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 24 | ✓                   |               |                     |                   |                      |                           |                  |                               |                        |                |
| 25 | RESPONSE:           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 26 |                     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 27 | ✓                   |               |                     |                   |                      |                           |                  |                               |                        |                |
| 28 | RESPONSE:           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 29 |                     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 30 | ✓                   |               |                     |                   |                      |                           |                  |                               |                        |                |
| 31 | RESPONSE:           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 32 |                     |               |                     |                   |                      |                           |                  |                               |                        |                |

|    | A                                                                                                               | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|----|-----------------------------------------------------------------------------------------------------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 7  | Member Account Type                                                                                             | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 33 | <b>Alerts, Notifications or Warnings From a Consumer Reporting Agency</b>                                       |               |                     |                   |                      |                           |                  |                               |                        |                |
| 34 | A fraud or active duty alert is included with a consumer report.                                                |               |                     |                   |                      |                           |                  |                               |                        |                |
| 35 | RESPONSE:                                                                                                       |               |                     |                   |                      |                           |                  |                               |                        |                |
| 36 | A consumer reporting agency provides a notice of credit freeze in RESPONSE: to a request for a consumer report. |               |                     |                   |                      |                           |                  |                               |                        |                |
| 37 | RESPONSE:                                                                                                       |               |                     |                   |                      |                           |                  |                               |                        |                |
| 38 | A consumer reporting agency provides a notice of address discrepancy.                                           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 39 | RESPONSE:                                                                                                       |               |                     |                   |                      |                           |                  |                               |                        |                |

|    | A                                                                                                                                                         | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                                | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 40 | A consumer report indicates a pattern of activity that is inconsistent with the history and usual pattern of activity of an applicant or member, such as: |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 41 |                                                                                                                                                           |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 42 | a. A recent and significant increase in the volume of                                                                                                     |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 43 | <b>RESPONSE:</b>                                                                                                                                          |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 44 | b. An unusual number of recently established credit relationships;                                                                                        |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 45 | <b>RESPONSE:</b>                                                                                                                                          |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 46 | c. A material change in the use of credit, especially with respect to recently established credit relationships; or                                       |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 47 | <b>RESPONSE:</b>                                                                                                                                          |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                            | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|----------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                   | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 48 | d. An account that was closed for cause or identified for abuse of account privileges by a financial institution or creditor.                |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 49 | RESPONSE:                                                                                                                                    |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 50 | <b>Suspicious Documents</b>                                                                                                                  |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 51 | Documents provided for identification appear to have been altered or forged.                                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 52 | RESPONSE:                                                                                                                                    |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 53 | The photograph or physical description on the identification is not consistent with the appearance of the applicant or member presenting the |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 54 | RESPONSE:                                                                                                                                    |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                                                        | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                                               | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 55 | Other information on the identification is not consistent with information provided by the person opening a new covered account or member presenting the identification. |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 56 | <b>RESPONSE:</b>                                                                                                                                                         |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 57 | Other information on the identification is not consistent with readily accessible information that is on file, such as a signature card or a recent check.               |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 58 | <b>RESPONSE:</b>                                                                                                                                                         |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 59 | An application appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled.                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 60 | <b>RESPONSE:</b>                                                                                                                                                         |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                                                                                                        | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                                                                                               | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 61 | <b><i>Suspicious Personal Identifying Information</i></b>                                                                                                                                                                |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 62 | Personal identifying information provided is inconsistent when compared against external information sources used by the                                                                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 63 |                                                                                                                                                                                                                          |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 64 | a. The address does not match any address in the consumer report; or                                                                                                                                                     |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 65 | <b>RESPONSE:</b>                                                                                                                                                                                                         |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 66 | b. The Social Security Number (SSN) has not been issued, or is listed on the Social Security Administration's Death Master File.                                                                                         |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 67 | <b>RESPONSE:</b>                                                                                                                                                                                                         |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 68 | Personal identifying information provided by the member is not consistent with other personal identifying information provided by the member. For example, there is a lack of correlation between the SSN range and date |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                                                                                                                                                                                               | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                                                                                                                                                                                      | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 69 | RESPONSE:                                                                                                                                                                                                                                                                                                       |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 70 | Personal identifying information provided is associated with known fraudulent activity as indicated by internal or third-party sources used by the federal credit union. For example: The address or telephone number on an application is the same as the address or telephone number provided on a fraudulent |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 71 | RESPONSE:                                                                                                                                                                                                                                                                                                       |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 72 | Personal identifying information provided is of a type commonly associated with fraudulent activity as indicated by internal or third-party sources used by the credit union. For example:                                                                                                                      |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 73 |                                                                                                                                                                                                                                                                                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 74 | a. The address on an application is fictitious, a mail drop, or prison;                                                                                                                                                                                                                                         |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                                                      | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                                             | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 75 | RESPONSE:                                                                                                                                                              |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 76 | b. The phone number is invalid, or is associated with a pager or answering service.                                                                                    |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 77 | RESPONSE:                                                                                                                                                              |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 78 | The SSN provided is the same as that submitted by other persons opening an account or other members.                                                                   |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 79 | RESPONSE:                                                                                                                                                              |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 80 | The address or telephone number provided is the same as or similar to those submitted by an unusually large number of other persons opening accounts or other members. |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                                                                                         | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                                                                                | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 81 | RESPONSE:                                                                                                                                                                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 82 | The person opening the covered account or the member fails to provide all required personal identifying information on an application or in RESPONSE: to notification that the application is incomplete. |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 83 | RESPONSE:                                                                                                                                                                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 84 | Personal identifying information provided is not consistent with personal identifying information that is on file with the credit union.                                                                  |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 85 | RESPONSE:                                                                                                                                                                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                                                               | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7  | <b>Member Account Type</b>                                                                                                                                                      | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 86 | The person opening the covered account or the member cannot provide authenticating information beyond that which generally would be available from a wallet or consumer report. |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 87 | <b>RESPONSE:</b>                                                                                                                                                                |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 88 | <b><i>Unusual Use of, or Suspicious Activity Related to, the Covered Account</i></b>                                                                                            |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 89 | Shortly following the notice of a change of address for a covered account, the institution or creditor receives a request for a new,                                            |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 90 | <b>RESPONSE:</b>                                                                                                                                                                |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 91 | A new revolving credit account is used in a manner commonly associated with known patterns of fraud patterns. For example:                                                      |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 92 |                                                                                                                                                                                 |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|    | A                                                                                                                                                         | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 7  | Member Account Type                                                                                                                                       | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 93 | a. The member fails to make the first payment or makes an initial payment but no subsequent payments; or                                                  |               |                     |                   |                      |                           |                  |                               |                        |                |
| 94 | RESPONSE:                                                                                                                                                 |               |                     |                   |                      |                           |                  |                               |                        |                |
| 95 | b. The majority of available credit is used for cash advances or merchandise that is easily convertible to cash (e.g., electronics equipment or jewelry); |               |                     |                   |                      |                           |                  |                               |                        |                |
| 96 | RESPONSE:                                                                                                                                                 |               |                     |                   |                      |                           |                  |                               |                        |                |
| 97 | A covered account is used in a manner that is not consistent with established patterns of activity on the account. There is, for                          |               |                     |                   |                      |                           |                  |                               |                        |                |
| 98 | RESPONSE:                                                                                                                                                 |               |                     |                   |                      |                           |                  |                               |                        |                |
| 99 | a. Nonpayment when there is no history of late or missed payments;                                                                                        |               |                     |                   |                      |                           |                  |                               |                        |                |

|     | A                                                                                      | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|-----|----------------------------------------------------------------------------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 7   | Member Account Type                                                                    | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 100 | RESPONSE:                                                                              |               |                     |                   |                      |                           |                  |                               |                        |                |
| 101 | b. A material increase in the use of available credit;                                 |               |                     |                   |                      |                           |                  |                               |                        |                |
| 102 | RESPONSE:                                                                              |               |                     |                   |                      |                           |                  |                               |                        |                |
| 103 | c. A material change in purchasing or spending patterns;                               |               |                     |                   |                      |                           |                  |                               |                        |                |
| 104 | RESPONSE:                                                                              |               |                     |                   |                      |                           |                  |                               |                        |                |
| 105 | d. A material change in electronic fund transfer patterns in connection with a deposit |               |                     |                   |                      |                           |                  |                               |                        |                |
| 106 | RESPONSE:                                                                              |               |                     |                   |                      |                           |                  |                               |                        |                |

|     | A                                                                                                                                                                                                   | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7   | <b>Member Account Type</b>                                                                                                                                                                          | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 107 | A covered account that has been inactive for a reasonably lengthy period of time is used (taking into consideration the type of account, the expected pattern of usage and other relevant factors). |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 108 | RESPONSE:                                                                                                                                                                                           |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 109 | Mail sent to the member is returned repeatedly as undeliverable although transactions continue to be conducted in connection with the member's covered account.                                     |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 110 | RESPONSE:                                                                                                                                                                                           |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 111 | The credit union is notified that the member is not receiving paper account statements.                                                                                                             |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 112 | RESPONSE:                                                                                                                                                                                           |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|     | A                                                                                                                                  | B                    | C                          | D                        | E                           | F                                | G                       | H                                    | I                             | J                     |
|-----|------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|-----------------------------|----------------------------------|-------------------------|--------------------------------------|-------------------------------|-----------------------|
| 7   | <b>Member Account Type</b>                                                                                                         | <i>Share savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> | <i>Club Savings Account</i> | <i>Custodial Savings Account</i> | <i>Safe Deposit Box</i> | <i>Individual Retirement Account</i> | <i>Health Savings Account</i> | <i>Trust Accounts</i> |
| 113 | The credit union is notified of unauthorized charges or transactions in connection with a member's covered account.                |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 114 | <b>RESPONSE:</b>                                                                                                                   |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 115 | <b>Notice From Members or Others Regarding Possible ID Theft</b>                                                                   |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 116 | The credit union is notified by a member, a victim of identity theft, a law enforcement authority, or any other person that it has |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 117 | <b>RESPONSE:</b>                                                                                                                   |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 118 | <b>Other Red Flags</b>                                                                                                             |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |
| 119 | The name of an employee of the financial institution or creditor has been added as an authorized user on an account.               |                      |                            |                          |                             |                                  |                         |                                      |                               |                       |

|     | A                                                                                             | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|-----|-----------------------------------------------------------------------------------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 7   | Member Account Type                                                                           | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 120 | RESPONSE:                                                                                     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 121 | An employee has accessed or downloaded an unusually large number of customer account records. |               |                     |                   |                      |                           |                  |                               |                        |                |
| 122 | RESPONSE:                                                                                     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 123 | The credit union detects attempts to access a customer's account by unauthorized persons.     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 124 | RESPONSE:                                                                                     |               |                     |                   |                      |                           |                  |                               |                        |                |
| 125 | The credit union detects or is informed of unauthorized access to a customer's personal       |               |                     |                   |                      |                           |                  |                               |                        |                |

|     | A                                                                                                                      | B             | C                   | D                 | E                    | F                         | G                | H                             | I                      | J              |
|-----|------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|-------------------|----------------------|---------------------------|------------------|-------------------------------|------------------------|----------------|
| 7   | Member Account Type                                                                                                    | Share savings | Share draft account | Share Certificate | Club Savings Account | Custodial Savings Account | Safe Deposit Box | Individual Retirement Account | Health Savings Account | Trust Accounts |
| 126 | RESPONSE:                                                                                                              |               |                     |                   |                      |                           |                  |                               |                        |                |
| 127 | There are unusually frequent and large check orders in connection with a customer's account.                           |               |                     |                   |                      |                           |                  |                               |                        |                |
| 128 | RESPONSE:                                                                                                              |               |                     |                   |                      |                           |                  |                               |                        |                |
| 129 | The person opening the account or the customer is unable to lift a credit freeze placed on his or her consumer report. |               |                     |                   |                      |                           |                  |                               |                        |                |
| 130 | RESPONSE:                                                                                                              |               |                     |                   |                      |                           |                  |                               |                        |                |

**Cell:** A33

**Comment:** Does the credit union obtain consumer reports for covered accounts? If so, does the staff check the report for the issues listed above?

**Cell:** A66

**Comment:** [Does the credit union make it a policy to check the Death Master File? Does it have resources to find out whether an SSN has been issued?

**Cell:** A68

**Comment:** Some vendors may provide information on the year a SSN became available and in what state. Does the credit union have a vendor that can do this?

**Cell:** A70

**Comment:** Can the credit union's system "flag" an address or telephone number from a fraudulent application, to alert staff if the same address or number is provided again in the future?

**Cell:** A76

**Comment:** Can/does the credit union check these things?

**Cell:** A78

**Comment:** Does the credit union have a system to cross-check SSNs?

**Cell:** A80

**Comment:** Does the credit union have a system to identify addresses or telephone numbers provided by other applicants or members?

**Cell:** A82

**Comment:** Does the credit union follow up on incomplete applications to see if missing information is supplied?

**Cell:** A86

**Comment:** Does staff ask "challenge questions," to elicit information the real member should know?

**Cell:** A89

**Comment:** Does the credit union have procedures in place to alert staff of a recent change in address on a covered account?

**Cell:** A95

**Comment:** Can the credit union's system identify such transactions and flag them for staff?

**Cell:** A105

**Comment:** Does the credit union have resources to monitor “patterns of activity” on accounts?

**Cell:** A107

**Comment:** Does your system alert you to transactions on inactive accounts?

**Cell:** A109

**Comment:** Is an account flagged if mail is returned as undeliverable?

**Cell:** A119

**Comment:** Can your system monitor and detect when any employee’s name has been added to an account?

**Cell:** A121

**Comment:** Can your system detect in a practical manner whether employees have accessed or downloaded an unusually large number of customer account records?

**Cell:** A127

**Comment:** Would a check vendor notify the credit union of an unusual request? Would this necessarily indicate possible identity theft?

**Cell:** A129

**Comment:** Commenters to the proposed rule objected to this red flag being included in the list. How would the credit union know that the applicant is unable to lift a credit freeze? What if the member simply chose not to? What action would/could the credit union take in this situation?

|    | A                                                         | B          | C               | D                      | E                           | F            | G              |
|----|-----------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 1  | Credit Union                                              |            |                 |                        |                             |              |                |
| 2  | Identity Theft "Red Flags" Program Risk Assessment Matrix |            |                 |                        |                             |              |                |
| 3  |                                                           |            |                 |                        |                             |              |                |
| 4  | Red Flags Analysis - Member Loans                         |            |                 |                        |                             |              |                |
| 5  |                                                           |            |                 |                        |                             |              |                |
| 6  |                                                           |            |                 |                        |                             |              |                |
| 7  | Member Loan Type                                          | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 8  | Credit union defined risks                                |            |                 |                        |                             |              |                |
| 9  | ✓                                                         |            |                 |                        |                             |              |                |
| 10 | RESPONSE:                                                 |            |                 |                        |                             |              |                |
| 11 |                                                           |            |                 |                        |                             |              |                |
| 12 | ✓                                                         |            |                 |                        |                             |              |                |
| 13 | RESPONSE:                                                 |            |                 |                        |                             |              |                |
| 14 |                                                           |            |                 |                        |                             |              |                |

|    | A                | B          | C               | D                      | E                           | F            | G              |
|----|------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7  | Member Loan Type | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 15 | ✓                |            |                 |                        |                             |              |                |
| 16 | RESPONSE:        |            |                 |                        |                             |              |                |
| 17 |                  |            |                 |                        |                             |              |                |
| 18 | ✓                |            |                 |                        |                             |              |                |
| 19 | RESPONSE:        |            |                 |                        |                             |              |                |
| 20 |                  |            |                 |                        |                             |              |                |
| 21 | ✓                |            |                 |                        |                             |              |                |
| 22 | RESPONSE:        |            |                 |                        |                             |              |                |
| 23 |                  |            |                 |                        |                             |              |                |

|    | A                       | B                 | C                      | D                             | E                                  | F                   | G                     |
|----|-------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
|    |                         | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 7  | <b>Member Loan Type</b> |                   |                        |                               |                                    |                     |                       |
| 24 | ✓                       |                   |                        |                               |                                    |                     |                       |
| 25 | RESPONSE:               |                   |                        |                               |                                    |                     |                       |
| 26 |                         |                   |                        |                               |                                    |                     |                       |
| 27 | ✓                       |                   |                        |                               |                                    |                     |                       |
| 28 | RESPONSE:               |                   |                        |                               |                                    |                     |                       |
| 29 |                         |                   |                        |                               |                                    |                     |                       |
| 30 | ✓                       |                   |                        |                               |                                    |                     |                       |
| 31 | RESPONSE:               |                   |                        |                               |                                    |                     |                       |
| 32 |                         |                   |                        |                               |                                    |                     |                       |
| 33 |                         |                   |                        |                               |                                    |                     |                       |

|    | A                                                                                                               | B          | C               | D                      | E                           | F            | G              |
|----|-----------------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7  | Member Loan Type                                                                                                | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 34 | <b>Alerts, Notifications or Warnings From a Consumer Reporting Agency</b>                                       |            |                 |                        |                             |              |                |
| 35 | A fraud or active duty alert is included with a consumer report.                                                |            |                 |                        |                             |              |                |
| 36 | RESPONSE:                                                                                                       |            |                 |                        |                             |              |                |
| 37 | A consumer reporting agency provides a notice of credit freeze in RESPONSE: to a request for a consumer report. |            |                 |                        |                             |              |                |
| 38 | RESPONSE:                                                                                                       |            |                 |                        |                             |              |                |
| 39 | A consumer reporting agency provides a notice of address discrepancy.                                           |            |                 |                        |                             |              |                |
| 40 | RESPONSE:                                                                                                       |            |                 |                        |                             |              |                |

|    | A                                                                                                                                                         | B                 | C                      | D                             | E                                  | F                   | G                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
| 7  | Member Loan Type                                                                                                                                          | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 41 | A consumer report indicates a pattern of activity that is inconsistent with the history and usual pattern of activity of an applicant or member, such as: |                   |                        |                               |                                    |                     |                       |
| 42 |                                                                                                                                                           |                   |                        |                               |                                    |                     |                       |
| 43 | a. A recent and significant increase in the volume of inquiries;                                                                                          |                   |                        |                               |                                    |                     |                       |
| 44 | RESPONSE:                                                                                                                                                 |                   |                        |                               |                                    |                     |                       |
| 45 | b. An unusual number of recently established credit relationships;                                                                                        |                   |                        |                               |                                    |                     |                       |
| 46 | RESPONSE:                                                                                                                                                 |                   |                        |                               |                                    |                     |                       |

|    | A                                                                                                                             | B          | C               | D                      | E                           | F            | G              |
|----|-------------------------------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7  | Member Loan Type                                                                                                              | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 47 | c. A material change in the use of credit, especially with respect to recently established credit relationships; or           |            |                 |                        |                             |              |                |
| 48 | RESPONSE:                                                                                                                     |            |                 |                        |                             |              |                |
| 49 | d. An account that was closed for cause or identified for abuse of account privileges by a financial institution or creditor. |            |                 |                        |                             |              |                |
| 50 | RESPONSE:                                                                                                                     |            |                 |                        |                             |              |                |
| 51 | <b>Suspicious Documents</b>                                                                                                   |            |                 |                        |                             |              |                |
| 52 | Documents provided for identification appear to have been altered or forged.                                                  |            |                 |                        |                             |              |                |
| 53 | RESPONSE:                                                                                                                     |            |                 |                        |                             |              |                |

|    | A                                                                                                                                                                        | B                 | C                      | D                             | E                                  | F                   | G                     |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
| 7  | Member Loan Type                                                                                                                                                         | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 54 | The photograph or physical description on the identification is not consistent with the appearance of the applicant or member presenting the identification.             |                   |                        |                               |                                    |                     |                       |
| 55 | RESPONSE:                                                                                                                                                                |                   |                        |                               |                                    |                     |                       |
| 56 | Other information on the identification is not consistent with information provided by the person opening a new covered account or member presenting the identification. |                   |                        |                               |                                    |                     |                       |
| 57 | RESPONSE:                                                                                                                                                                |                   |                        |                               |                                    |                     |                       |
| 58 | Other information on the identification is not consistent with readily accessible information that is on file, such as a signature card or a recent check.               |                   |                        |                               |                                    |                     |                       |
| 59 | RESPONSE:                                                                                                                                                                |                   |                        |                               |                                    |                     |                       |

|    | A                                                                                                                                                   | B          | C               | D                      | E                           | F            | G              |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7  | Member Loan Type                                                                                                                                    | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 60 | An application appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled.                            |            |                 |                        |                             |              |                |
| 61 | RESPONSE:                                                                                                                                           |            |                 |                        |                             |              |                |
| 62 | <b>Suspicious Personal Identifying Information</b>                                                                                                  |            |                 |                        |                             |              |                |
| 63 | Personal identifying information provided is inconsistent when compared against external information sources used by the credit union. For example: |            |                 |                        |                             |              |                |
| 64 |                                                                                                                                                     |            |                 |                        |                             |              |                |
| 65 | a. The address does not match any address in the consumer report; or                                                                                |            |                 |                        |                             |              |                |
| 66 | RESPONSE:                                                                                                                                           |            |                 |                        |                             |              |                |
| 67 | b. The Social Security Number (SSN) has not been issued, or is listed on the Social Security Administration's Death Master File.                    |            |                 |                        |                             |              |                |

|    | A                                                                                                                                                                                                                                                                                                                            | B                 | C                      | D                             | E                                  | F                   | G                     |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
| 7  | Member Loan Type                                                                                                                                                                                                                                                                                                             | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 68 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                   |                        |                               |                                    |                     |                       |
| 69 | Personal identifying information provided by the member is not consistent with other personal identifying information provided by the member. For example, there is a lack of correlation between the SSN range and date of birth.                                                                                           |                   |                        |                               |                                    |                     |                       |
| 70 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                   |                        |                               |                                    |                     |                       |
| 71 | Personal identifying information provided is associated with known fraudulent activity as indicated by internal or third-party sources used by the federal credit union. For example: The address or telephone number on an application is the same as the address or telephone number provided on a fraudulent application. |                   |                        |                               |                                    |                     |                       |
| 72 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                   |                        |                               |                                    |                     |                       |

|    | A                                                                                                                                                                                          | B          | C               | D                      | E                           | F            | G              |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7  | Member Loan Type                                                                                                                                                                           | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 73 | Personal identifying information provided is of a type commonly associated with fraudulent activity as indicated by internal or third-party sources used by the credit union. For example: |            |                 |                        |                             |              |                |
| 74 |                                                                                                                                                                                            |            |                 |                        |                             |              |                |
| 75 | a. The address on an application is fictitious, a mail drop, or prison; or                                                                                                                 |            |                 |                        |                             |              |                |
| 76 | RESPONSE:                                                                                                                                                                                  |            |                 |                        |                             |              |                |
| 77 | b. The phone number is invalid, or is associated with a pager or answering service.                                                                                                        |            |                 |                        |                             |              |                |
| 78 | RESPONSE:                                                                                                                                                                                  |            |                 |                        |                             |              |                |
| 79 | The SSN provided is the same as that submitted by other persons opening an account or other members.                                                                                       |            |                 |                        |                             |              |                |
| 80 | RESPONSE:                                                                                                                                                                                  |            |                 |                        |                             |              |                |

|    | A                                                                                                                                                                                                         | B          | C               | D                      | E                           | F            | G              |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7  | Member Loan Type                                                                                                                                                                                          | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 81 | The address or telephone number provided is the same as or similar to those submitted by an unusually large number of other persons opening accounts or other members.                                    |            |                 |                        |                             |              |                |
| 82 | RESPONSE:                                                                                                                                                                                                 |            |                 |                        |                             |              |                |
| 83 | The person opening the covered account or the member fails to provide all required personal identifying information on an application or in RESPONSE: to notification that the application is incomplete. |            |                 |                        |                             |              |                |
| 84 | RESPONSE:                                                                                                                                                                                                 |            |                 |                        |                             |              |                |
| 85 | Personal identifying information provided is not consistent with personal identifying information that is on file with the credit union.                                                                  |            |                 |                        |                             |              |                |
| 86 | RESPONSE:                                                                                                                                                                                                 |            |                 |                        |                             |              |                |

|    | A                                                                                                                                                                                                                                             | B                 | C                      | D                             | E                                  | F                   | G                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
|    |                                                                                                                                                                                                                                               | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 7  | <b>Member Loan Type</b>                                                                                                                                                                                                                       |                   |                        |                               |                                    |                     |                       |
| 87 | The person opening the covered account or the member cannot provide authenticating information beyond that which generally would be available from a wallet or consumer report.                                                               |                   |                        |                               |                                    |                     |                       |
| 88 | RESPONSE:                                                                                                                                                                                                                                     |                   |                        |                               |                                    |                     |                       |
| 89 | <b><i>Unusual Use of, or Suspicious Activity Related to, the Covered Account</i></b>                                                                                                                                                          |                   |                        |                               |                                    |                     |                       |
| 90 | Shortly following the notice of a change of address for a covered account, the institution or creditor receives a request for a new, additional, or replacement card or a cell phone, or for the addition of authorized users on the account. |                   |                        |                               |                                    |                     |                       |
| 91 | RESPONSE:                                                                                                                                                                                                                                     |                   |                        |                               |                                    |                     |                       |
| 92 | A new revolving credit account is used in a manner commonly associated with known patterns of fraud patterns. For example:                                                                                                                    |                   |                        |                               |                                    |                     |                       |

|    | A                                                                                                                                                         | B          | C               | D                      | E                           | F            | G              |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7  | Member Loan Type                                                                                                                                          | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 93 | a. The member fails to make the first payment or makes an initial payment but no subsequent payments; or                                                  |            |                 |                        |                             |              |                |
| 94 | RESPONSE:                                                                                                                                                 |            |                 |                        |                             |              |                |
| 95 | b. The majority of available credit is used for cash advances or merchandise that is easily convertible to cash (e.g., electronics equipment or jewelry); |            |                 |                        |                             |              |                |
| 96 | RESPONSE:                                                                                                                                                 |            |                 |                        |                             |              |                |
| 97 | A covered account is used in a manner that is not consistent with established patterns of activity on the account. There is, for example:                 |            |                 |                        |                             |              |                |
| 98 | RESPONSE:                                                                                                                                                 |            |                 |                        |                             |              |                |
| 99 | a. Nonpayment when there is no history of late or missed payments;                                                                                        |            |                 |                        |                             |              |                |

|     | A                                                                                               | B                 | C                      | D                             | E                                  | F                   | G                     |
|-----|-------------------------------------------------------------------------------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
| 7   | Member Loan Type                                                                                | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 100 | RESPONSE:                                                                                       |                   |                        |                               |                                    |                     |                       |
| 101 | b. A material increase in the use of available credit;                                          |                   |                        |                               |                                    |                     |                       |
| 102 | RESPONSE:                                                                                       |                   |                        |                               |                                    |                     |                       |
| 103 | c. A material change in purchasing or spending patterns; or                                     |                   |                        |                               |                                    |                     |                       |
| 104 | RESPONSE:                                                                                       |                   |                        |                               |                                    |                     |                       |
| 105 | d. A material change in electronic fund transfer patterns in connection with a deposit account. |                   |                        |                               |                                    |                     |                       |
| 106 | RESPONSE:                                                                                       |                   |                        |                               |                                    |                     |                       |

|     | A                                                                                                                                                                                                   | B          | C               | D                      | E                           | F            | G              |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7   | Member Loan Type                                                                                                                                                                                    | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 107 | A covered account that has been inactive for a reasonably lengthy period of time is used (taking into consideration the type of account, the expected pattern of usage and other relevant factors). |            |                 |                        |                             |              |                |
| 108 | RESPONSE:                                                                                                                                                                                           |            |                 |                        |                             |              |                |
| 109 | Mail sent to the member is returned repeatedly as undeliverable although transactions continue to be conducted in connection with the member's covered account.                                     |            |                 |                        |                             |              |                |
| 110 | RESPONSE:                                                                                                                                                                                           |            |                 |                        |                             |              |                |
| 111 | The credit union is notified that the member is not receiving paper account statements.                                                                                                             |            |                 |                        |                             |              |                |
| 112 | RESPONSE:                                                                                                                                                                                           |            |                 |                        |                             |              |                |

|     | A                                                                                                                                           | B                 | C                      | D                             | E                                  | F                   | G                     |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
| 7   | <b>Member Loan Type</b>                                                                                                                     | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 113 | The credit union is notified of unauthorized charges or transactions in connection with a member's covered account.                         |                   |                        |                               |                                    |                     |                       |
| 114 | <b>RESPONSE:</b>                                                                                                                            |                   |                        |                               |                                    |                     |                       |
| 115 | <b>Notice From Members or Others Regarding Possible ID Theft</b>                                                                            |                   |                        |                               |                                    |                     |                       |
| 116 | The credit union is notified by a member, a victim of identity theft, a law enforcement authority, or any other person that it has opened a |                   |                        |                               |                                    |                     |                       |
| 117 | <b>RESPONSE:</b>                                                                                                                            |                   |                        |                               |                                    |                     |                       |
| 118 | <b>Other Red Flags</b>                                                                                                                      |                   |                        |                               |                                    |                     |                       |
| 119 | The name of an employee of the financial institution or creditor has been added as an authorized user on an account.                        |                   |                        |                               |                                    |                     |                       |
| 120 | <b>RESPONSE:</b>                                                                                                                            |                   |                        |                               |                                    |                     |                       |

|     | A                                                                                                    | B          | C               | D                      | E                           | F            | G              |
|-----|------------------------------------------------------------------------------------------------------|------------|-----------------|------------------------|-----------------------------|--------------|----------------|
| 7   | Member Loan Type                                                                                     | Term Loans | Lines of Credit | Real Estate Term Loans | Real Estate Lines of Credit | Credit cards | Indirect loans |
| 121 | An employee has accessed or downloaded an unusually large number of customer account records.        |            |                 |                        |                             |              |                |
| 122 | RESPONSE:                                                                                            |            |                 |                        |                             |              |                |
| 123 | The credit union detects attempts to access a customer's account by unauthorized persons.            |            |                 |                        |                             |              |                |
| 124 | RESPONSE:                                                                                            |            |                 |                        |                             |              |                |
| 125 | The credit union detects or is informed of unauthorized access to a customer's personal information. |            |                 |                        |                             |              |                |
| 126 | RESPONSE:                                                                                            |            |                 |                        |                             |              |                |
| 127 | There are unusually frequent and large check orders in connection with a customer's account.         |            |                 |                        |                             |              |                |

|     | A                                                                                                                      | B                 | C                      | D                             | E                                  | F                   | G                     |
|-----|------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------|-------------------------------|------------------------------------|---------------------|-----------------------|
| 7   | Member Loan Type                                                                                                       | <i>Term Loans</i> | <i>Lines of Credit</i> | <i>Real Estate Term Loans</i> | <i>Real Estate Lines of Credit</i> | <i>Credit cards</i> | <i>Indirect loans</i> |
| 128 | RESPONSE:                                                                                                              |                   |                        |                               |                                    |                     |                       |
| 129 | The person opening the account or the customer is unable to lift a credit freeze placed on his or her consumer report. |                   |                        |                               |                                    |                     |                       |
| 130 | RESPONSE:                                                                                                              |                   |                        |                               |                                    |                     |                       |

**Cell:** A34

**Comment:** Does the credit union obtain consumer reports for covered accounts? If so, does the staff check the report for the issues listed above?

**Cell:** A67

**Comment:** [Does the credit union make it a policy to check the Death Master File? Does it have resources to find out whether an SSN has been issued?

**Cell:** A69

**Comment:** Some vendors may provide information on the year a SSN became available and in what state. Does the credit union have a vendor that can do this?

**Cell:** A71

**Comment:** Can the credit union's system "flag" an address or telephone number from a fraudulent application, to alert staff if the same address or number is provided again in the future?

**Cell:** A77

**Comment:** Can/does the credit union check these things?

**Cell:** A79

**Comment:** Does the credit union have a system to cross-check SSNs?

**Cell:** A81

**Comment:** Does the credit union have a system to identify addresses or telephone numbers provided by other applicants or members?

**Cell:** A83

**Comment:** Does the credit union follow up on incomplete applications to see if missing information is supplied?

**Cell:** A87

**Comment:** Does staff ask "challenge questions," to elicit information the real member should know?

**Cell:** A90

**Comment:** Does the credit union have procedures in place to alert staff of a recent change in address on a covered account?

**Cell:** A95

**Comment:** Can the credit union's system identify such transactions and flag them for staff?

**Cell:** A105

**Comment:** Does the credit union have resources to monitor “patterns of activity” on accounts?

**Cell:** A107

**Comment:** Does your system alert you to transactions on inactive accounts?

**Cell:** A109

**Comment:** Is an account flagged if mail is returned as undeliverable?

**Cell:** A119

**Comment:** Can your system monitor and detect when any employee’s name has been added to an account?

**Cell:** A121

**Comment:** Can your system detect in a practical manner whether employees have accessed or downloaded an unusually large number of customer account records?

**Cell:** A127

**Comment:** Would a check vendor notify the credit union of an unusual request? Would this necessarily indicate possible identity theft?

**Cell:** A129

**Comment:** Commenters to the proposed rule objected to this red flag being included in the list. How would the credit union know that the applicant is unable to lift a credit freeze? What if the member simply chose not to? What action would/could the credit union take in this situation?

|    | A                                                         | B             | C                   | D                 | E | F | G | H | I |
|----|-----------------------------------------------------------|---------------|---------------------|-------------------|---|---|---|---|---|
| 1  | Credit Union                                              |               |                     |                   |   |   |   |   |   |
| 2  | Identity Theft "Red Flags" Program Risk Assessment Matrix |               |                     |                   |   |   |   |   |   |
| 3  |                                                           |               |                     |                   |   |   |   |   |   |
| 4  | Red Flags Analysis - Member Business Deposits             |               |                     |                   |   |   |   |   |   |
| 5  |                                                           |               |                     |                   |   |   |   |   |   |
| 6  | Business Member Account Type                              | Share Savings | Share draft account | Share Certificate |   |   |   |   |   |
| 7  | <b>Credit union defined risks</b>                         |               |                     |                   |   |   |   |   |   |
| 8  | ✓                                                         |               |                     |                   |   |   |   |   |   |
| 9  | RESPONSE: :                                               |               |                     |                   |   |   |   |   |   |
| 10 |                                                           |               |                     |                   |   |   |   |   |   |
| 11 | ✓                                                         |               |                     |                   |   |   |   |   |   |
| 12 | RESPONSE:                                                 |               |                     |                   |   |   |   |   |   |
| 13 |                                                           |               |                     |                   |   |   |   |   |   |
| 14 | ✓                                                         |               |                     |                   |   |   |   |   |   |
| 15 | RESPONSE:                                                 |               |                     |                   |   |   |   |   |   |
| 16 |                                                           |               |                     |                   |   |   |   |   |   |
| 17 | ✓                                                         |               |                     |                   |   |   |   |   |   |
| 18 | RESPONSE:                                                 |               |                     |                   |   |   |   |   |   |

|    | A                                   | B                    | C                          | D                        | E | F | G | H | I |
|----|-------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b> | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 19 |                                     |                      |                            |                          |   |   |   |   |   |
| 20 | ✓                                   |                      |                            |                          |   |   |   |   |   |
| 21 | RESPONSE:                           |                      |                            |                          |   |   |   |   |   |
| 22 |                                     |                      |                            |                          |   |   |   |   |   |
| 23 | ✓                                   |                      |                            |                          |   |   |   |   |   |
| 24 | RESPONSE:                           |                      |                            |                          |   |   |   |   |   |
| 25 |                                     |                      |                            |                          |   |   |   |   |   |
| 26 | ✓                                   |                      |                            |                          |   |   |   |   |   |
| 27 | RESPONSE:                           |                      |                            |                          |   |   |   |   |   |
| 28 |                                     |                      |                            |                          |   |   |   |   |   |
| 29 | ✓                                   |                      |                            |                          |   |   |   |   |   |
| 30 | RESPONSE:                           |                      |                            |                          |   |   |   |   |   |
| 31 |                                     |                      |                            |                          |   |   |   |   |   |
| 32 |                                     |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                               | B                    | C                          | D                        | E | F | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                             | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 33 | <b><i>Alerts, Notifications or Warnings From a Consumer Reporting Agency</i></b>                                |                      |                            |                          |   |   |   |   |   |
| 34 | A fraud or active duty alert is included with a consumer report.                                                |                      |                            |                          |   |   |   |   |   |
| 35 | <b>RESPONSE:</b>                                                                                                |                      |                            |                          |   |   |   |   |   |
| 36 | A consumer reporting agency provides a notice of credit freeze in RESPONSE: to a request for a consumer report. |                      |                            |                          |   |   |   |   |   |
| 37 | <b>RESPONSE:</b>                                                                                                |                      |                            |                          |   |   |   |   |   |
| 38 | A consumer reporting agency provides a notice of address discrepancy.                                           |                      |                            |                          |   |   |   |   |   |
| 39 | <b>RESPONSE:</b>                                                                                                |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                         | B                    | C                          | D                        | E | F | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                       | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 40 | A consumer report indicates a pattern of activity that is inconsistent with the history and usual pattern of activity of an applicant or member, such as: |                      |                            |                          |   |   |   |   |   |
| 41 |                                                                                                                                                           |                      |                            |                          |   |   |   |   |   |
| 42 | a. A recent and significant increase in the volume of inquiries;                                                                                          |                      |                            |                          |   |   |   |   |   |
| 43 | <b>RESPONSE:</b>                                                                                                                                          |                      |                            |                          |   |   |   |   |   |
| 44 | b. An unusual number of recently established credit relationships;                                                                                        |                      |                            |                          |   |   |   |   |   |
| 45 | <b>RESPONSE:</b>                                                                                                                                          |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                             | B                    | C                          | D                        | E | F | G | H | I |
|----|-------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                           | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 46 | c. A material change in the use of credit, especially with respect to recently established credit relationships; or           |                      |                            |                          |   |   |   |   |   |
| 47 | RESPONSE:                                                                                                                     |                      |                            |                          |   |   |   |   |   |
| 48 | d. An account that was closed for cause or identified for abuse of account privileges by a financial institution or creditor. |                      |                            |                          |   |   |   |   |   |
| 49 | RESPONSE:                                                                                                                     |                      |                            |                          |   |   |   |   |   |
| 50 | <b>Suspicious Documents</b>                                                                                                   |                      |                            |                          |   |   |   |   |   |
| 51 | Documents provided for identification appear to have been altered or forged.                                                  |                      |                            |                          |   |   |   |   |   |
| 52 | RESPONSE:                                                                                                                     |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                                        | B                    | C                          | D                        | E | F | G | H | I |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                                      | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 53 | The photograph or physical description on the identification is not consistent with the appearance of the applicant or member presenting the identification.             |                      |                            |                          |   |   |   |   |   |
| 54 | RESPONSE:                                                                                                                                                                |                      |                            |                          |   |   |   |   |   |
| 55 | Other information on the identification is not consistent with information provided by the person opening a new covered account or member presenting the identification. |                      |                            |                          |   |   |   |   |   |
| 56 | RESPONSE:                                                                                                                                                                |                      |                            |                          |   |   |   |   |   |
| 57 | Other information on the identification is not consistent with readily accessible information that is on file, such as a signature card or a recent check.               |                      |                            |                          |   |   |   |   |   |
| 58 | RESPONSE:                                                                                                                                                                |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                   | B                    | C                          | D                        | E | F | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                 | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 59 | An application appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled.                            |                      |                            |                          |   |   |   |   |   |
| 60 | <b>RESPONSE:</b>                                                                                                                                    |                      |                            |                          |   |   |   |   |   |
| 61 | <b><i>Suspicious Personal Identifying Information</i></b>                                                                                           |                      |                            |                          |   |   |   |   |   |
| 62 | Personal identifying information provided is inconsistent when compared against external information sources used by the credit union. For example: |                      |                            |                          |   |   |   |   |   |
| 63 |                                                                                                                                                     |                      |                            |                          |   |   |   |   |   |
| 64 | a. The address does not match any address in the consumer report; or                                                                                |                      |                            |                          |   |   |   |   |   |
| 65 | <b>RESPONSE:</b>                                                                                                                                    |                      |                            |                          |   |   |   |   |   |
| 66 | b. The Social Security Number (SSN) has not been issued, or is listed on the Social Security Administration's Death Master File.                    |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                                                                                                                                                                                            | B                    | C                          | D                        | E | F | G | H | I |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                                                                                                                                                                                          | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 67 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                      |                            |                          |   |   |   |   |   |
| 68 | Personal identifying information provided by the member is not consistent with other personal identifying information provided by the member. For example, there is a lack of correlation between the SSN range and date of birth.                                                                                           |                      |                            |                          |   |   |   |   |   |
| 69 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                      |                            |                          |   |   |   |   |   |
| 70 | Personal identifying information provided is associated with known fraudulent activity as indicated by internal or third-party sources used by the federal credit union. For example: The address or telephone number on an application is the same as the address or telephone number provided on a fraudulent application. |                      |                            |                          |   |   |   |   |   |
| 71 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                                                          | B                    | C                          | D                        | E | F | G | H | I |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                                                        | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 72 | Personal identifying information provided is of a type commonly associated with fraudulent activity as indicated by internal or third-party sources used by the credit union. For example: |                      |                            |                          |   |   |   |   |   |
| 73 |                                                                                                                                                                                            |                      |                            |                          |   |   |   |   |   |
| 74 | a. The address on an application is fictitious, a mail drop, or prison; or                                                                                                                 |                      |                            |                          |   |   |   |   |   |
| 75 | <b>RESPONSE:</b>                                                                                                                                                                           |                      |                            |                          |   |   |   |   |   |
| 76 | b. The phone number is invalid, or is associated with a pager or answering service.                                                                                                        |                      |                            |                          |   |   |   |   |   |
| 77 | <b>RESPONSE:</b>                                                                                                                                                                           |                      |                            |                          |   |   |   |   |   |
| 78 | The SSN provided is the same as that submitted by other persons opening an account or other members.                                                                                       |                      |                            |                          |   |   |   |   |   |
| 79 | <b>RESPONSE:</b>                                                                                                                                                                           |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                                                                         | B                    | C                          | D                        | E | F | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                                                                       | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 80 | The address or telephone number provided is the same as or similar to those submitted by an unusually large number of other persons opening accounts or other members.                                    |                      |                            |                          |   |   |   |   |   |
| 81 | RESPONSE:                                                                                                                                                                                                 |                      |                            |                          |   |   |   |   |   |
| 82 | The person opening the covered account or the member fails to provide all required personal identifying information on an application or in RESPONSE: to notification that the application is incomplete. |                      |                            |                          |   |   |   |   |   |
| 83 | RESPONSE:                                                                                                                                                                                                 |                      |                            |                          |   |   |   |   |   |
| 84 | Personal identifying information provided is not consistent with personal identifying information that is on file with the credit union.                                                                  |                      |                            |                          |   |   |   |   |   |
| 85 | RESPONSE:                                                                                                                                                                                                 |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                                                                                                             | B                    | C                          | D                        | E | F | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                                                                                                           | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 86 | The person opening the covered account or the member cannot provide authenticating information beyond that which generally would be available from a wallet or consumer report.                                                               |                      |                            |                          |   |   |   |   |   |
| 87 | RESPONSE:                                                                                                                                                                                                                                     |                      |                            |                          |   |   |   |   |   |
| 88 | <b><i>Unusual Use of, or Suspicious Activity Related to, the Covered Account</i></b>                                                                                                                                                          |                      |                            |                          |   |   |   |   |   |
| 89 | Shortly following the notice of a change of address for a covered account, the institution or creditor receives a request for a new, additional, or replacement card or a cell phone, or for the addition of authorized users on the account. |                      |                            |                          |   |   |   |   |   |
| 90 | RESPONSE:                                                                                                                                                                                                                                     |                      |                            |                          |   |   |   |   |   |
| 91 | A new revolving credit account is used in a manner commonly associated with known patterns of fraud patterns. For example:                                                                                                                    |                      |                            |                          |   |   |   |   |   |
| 92 |                                                                                                                                                                                                                                               |                      |                            |                          |   |   |   |   |   |

|    | A                                                                                                                                                         | B                    | C                          | D                        | E | F | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6  | <b>Business Member Account Type</b>                                                                                                                       | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 93 | a. The member fails to make the first payment or makes an initial payment but no subsequent payments; or                                                  |                      |                            |                          |   |   |   |   |   |
| 94 | RESPONSE:                                                                                                                                                 |                      |                            |                          |   |   |   |   |   |
| 95 | b. The majority of available credit is used for cash advances or merchandise that is easily convertible to cash (e.g., electronics equipment or jewelry); |                      |                            |                          |   |   |   |   |   |
| 96 | RESPONSE:                                                                                                                                                 |                      |                            |                          |   |   |   |   |   |
| 97 | A covered account is used in a manner that is not consistent with established patterns of activity on the account. There is, for example:                 |                      |                            |                          |   |   |   |   |   |
| 98 | RESPONSE:                                                                                                                                                 |                      |                            |                          |   |   |   |   |   |
| 99 | a. Nonpayment when there is no history of late or missed payments;                                                                                        |                      |                            |                          |   |   |   |   |   |

|     | A                                                                                               | B                    | C                          | D                        | E | F | G | H | I |
|-----|-------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6   | <b>Business Member Account Type</b>                                                             | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 100 | <b>RESPONSE:</b>                                                                                |                      |                            |                          |   |   |   |   |   |
| 101 | b. A material increase in the use of available credit;                                          |                      |                            |                          |   |   |   |   |   |
| 102 | <b>RESPONSE:</b>                                                                                |                      |                            |                          |   |   |   |   |   |
| 103 | c. A material change in purchasing or spending patterns; or                                     |                      |                            |                          |   |   |   |   |   |
| 104 | <b>RESPONSE:</b>                                                                                |                      |                            |                          |   |   |   |   |   |
| 105 | d. A material change in electronic fund transfer patterns in connection with a deposit account. |                      |                            |                          |   |   |   |   |   |
| 106 | <b>RESPONSE:</b>                                                                                |                      |                            |                          |   |   |   |   |   |

|     | A                                                                                                                                                                                                   | B                    | C                          | D                        | E | F | G | H | I |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6   | <b>Business Member Account Type</b>                                                                                                                                                                 | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 107 | A covered account that has been inactive for a reasonably lengthy period of time is used (taking into consideration the type of account, the expected pattern of usage and other relevant factors). |                      |                            |                          |   |   |   |   |   |
| 108 | RESPONSE:                                                                                                                                                                                           |                      |                            |                          |   |   |   |   |   |
| 109 | Mail sent to the member is returned repeatedly as undeliverable although transactions continue to be conducted in connection with the member's covered account.                                     |                      |                            |                          |   |   |   |   |   |
| 110 | RESPONSE:                                                                                                                                                                                           |                      |                            |                          |   |   |   |   |   |
| 111 | The credit union is notified that the member is not receiving paper account statements.                                                                                                             |                      |                            |                          |   |   |   |   |   |
| 112 | RESPONSE:                                                                                                                                                                                           |                      |                            |                          |   |   |   |   |   |

|     | A                                                                                                                                                                                                      | B                    | C                          | D                        | E | F | G | H | I |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6   | <b>Business Member Account Type</b>                                                                                                                                                                    | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 113 | The credit union is notified of unauthorized charges or transactions in connection with a member's covered account.                                                                                    |                      |                            |                          |   |   |   |   |   |
| 114 | <b>RESPONSE:</b>                                                                                                                                                                                       |                      |                            |                          |   |   |   |   |   |
| 115 | <b>Notice From Members or Others Regarding Possible ID Theft</b>                                                                                                                                       |                      |                            |                          |   |   |   |   |   |
| 116 | The credit union is notified by a member, a victim of identity theft, a law enforcement authority, or any other person that it has opened a fraudulent account for a person engaged in identity theft. |                      |                            |                          |   |   |   |   |   |
| 117 | <b>RESPONSE:</b>                                                                                                                                                                                       |                      |                            |                          |   |   |   |   |   |
| 118 | <b>Other Red Flags</b>                                                                                                                                                                                 |                      |                            |                          |   |   |   |   |   |
| 119 | The name of an employee of the financial institution or creditor has been added as an authorized user on an account.                                                                                   |                      |                            |                          |   |   |   |   |   |

|     | A                                                                                                    | B                    | C                          | D                        | E | F | G | H | I |
|-----|------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6   | <b>Business Member Account Type</b>                                                                  | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 120 | RESPONSE:                                                                                            |                      |                            |                          |   |   |   |   |   |
| 121 | An employee has accessed or downloaded an unusually large number of customer account records.        |                      |                            |                          |   |   |   |   |   |
| 122 | RESPONSE:                                                                                            |                      |                            |                          |   |   |   |   |   |
| 123 | The credit union detects attempts to access a customer's account by unauthorized persons.            |                      |                            |                          |   |   |   |   |   |
| 124 | RESPONSE:                                                                                            |                      |                            |                          |   |   |   |   |   |
| 125 | The credit union detects or is informed of unauthorized access to a customer's personal information. |                      |                            |                          |   |   |   |   |   |
| 126 | RESPONSE:                                                                                            |                      |                            |                          |   |   |   |   |   |

|     | A                                                                                                                      | B                    | C                          | D                        | E | F | G | H | I |
|-----|------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------|--------------------------|---|---|---|---|---|
| 6   | <b>Business Member Account Type</b>                                                                                    | <i>Share Savings</i> | <i>Share draft account</i> | <i>Share Certificate</i> |   |   |   |   |   |
| 127 | There are unusually frequent and large check orders in connection with a customer's account.                           |                      |                            |                          |   |   |   |   |   |
| 128 | RESPONSE:                                                                                                              |                      |                            |                          |   |   |   |   |   |
| 129 | The person opening the account or the customer is unable to lift a credit freeze placed on his or her consumer report. |                      |                            |                          |   |   |   |   |   |
| 130 | RESPONSE:                                                                                                              |                      |                            |                          |   |   |   |   |   |

**Cell:** A33

**Comment:** Does the credit union obtain consumer reports for covered accounts? If so, does the staff check the report for the issues listed above?

**Cell:** A66

**Comment:** [Does the credit union make it a policy to check the Death Master File? Does it have resources to find out whether an SSN has been issued?

**Cell:** A68

**Comment:** Some vendors may provide information on the year a SSN became available and in what state. Does the credit union have a vendor that can do this?

**Cell:** A70

**Comment:** Can the credit union's system "flag" an address or telephone number from a fraudulent application, to alert staff if the same address or number is provided again in the future?

**Cell:** A76

**Comment:** Can/does the credit union check these things?

**Cell:** A78

**Comment:** Does the credit union have a system to cross-check SSNs?

**Cell:** A80

**Comment:** Does the credit union have a system to identify addresses or telephone numbers provided by other applicants or members?

**Cell:** A82

**Comment:** Does the credit union follow up on incomplete applications to see if missing information is supplied?

**Cell:** A86

**Comment:** Does staff ask "challenge questions," to elicit information the real member should know?

**Cell:** A89

**Comment:** Does the credit union have procedures in place to alert staff of a recent change in address on a covered account?

**Cell:** A95

**Comment:** Can the credit union's system identify such transactions and flag them for staff?

**Cell:** A105

**Comment:** Does the credit union have resources to monitor “patterns of activity” on accounts?

**Cell:** A107

**Comment:** Does your system alert you to transactions on inactive accounts?

**Cell:** A109

**Comment:** Is an account flagged if mail is returned as undeliverable?

**Cell:** A119

**Comment:** Can your system monitor and detect when any employee’s name has been added to an account?

**Cell:** A121

**Comment:** Can your system detect in a practical manner whether employees have accessed or downloaded an unusually large number of customer account records?

**Cell:** A127

**Comment:** Would a check vendor notify the credit union of an unusual request? Would this necessarily indicate possible identity theft?

**Cell:** A129

**Comment:** Commenters to the proposed rule objected to this red flag being included in the list. How would the credit union know that the applicant is unable to lift a credit freeze? What if the member simply chose not to? What action would/could the credit union take in this situation?

|    | A                                                         | B               | C                    | D                                 | E                                      | F            | G | H | I |
|----|-----------------------------------------------------------|-----------------|----------------------|-----------------------------------|----------------------------------------|--------------|---|---|---|
| 1  | Credit Union                                              |                 |                      |                                   |                                        |              |   |   |   |
| 2  | Identity Theft "Red Flags" Program Risk Assessment Matrix |                 |                      |                                   |                                        |              |   |   |   |
| 3  |                                                           |                 |                      |                                   |                                        |              |   |   |   |
| 4  | Red Flags Analysis - Member Business Loans                |                 |                      |                                   |                                        |              |   |   |   |
| 5  |                                                           |                 |                      |                                   |                                        |              |   |   |   |
| 6  |                                                           |                 |                      |                                   |                                        |              |   |   |   |
| 7  | Business Loan Type                                        | GBSA Term Loans | GBSA Lines of Credit | Commercial/Real Estate Term Loans | Commercial/Real Estate Lines of Credit | Credit cards |   |   |   |
| 8  | Credit union defined risks                                |                 |                      |                                   |                                        |              |   |   |   |
| 9  | ✓                                                         |                 |                      |                                   |                                        |              |   |   |   |
| 10 | RESPONSE:                                                 |                 |                      |                                   |                                        |              |   |   |   |
| 11 |                                                           |                 |                      |                                   |                                        |              |   |   |   |
| 12 | ✓                                                         |                 |                      |                                   |                                        |              |   |   |   |
| 13 | RESPONSE:                                                 |                 |                      |                                   |                                        |              |   |   |   |
| 14 |                                                           |                 |                      |                                   |                                        |              |   |   |   |

|    | A                  | B               | C                    | D                                 | E                                      | F            | G | H | I |
|----|--------------------|-----------------|----------------------|-----------------------------------|----------------------------------------|--------------|---|---|---|
| 7  | Business Loan Type | GBSA Term Loans | GBSA Lines of Credit | Commercial/Real Estate Term Loans | Commercial/Real Estate Lines of Credit | Credit cards |   |   |   |
| 15 | ✓                  |                 |                      |                                   |                                        |              |   |   |   |
| 16 | RESPONSE:          |                 |                      |                                   |                                        |              |   |   |   |
| 17 |                    |                 |                      |                                   |                                        |              |   |   |   |
| 18 | ✓                  |                 |                      |                                   |                                        |              |   |   |   |
| 19 | RESPONSE:          |                 |                      |                                   |                                        |              |   |   |   |
| 20 |                    |                 |                      |                                   |                                        |              |   |   |   |
| 21 | ✓                  |                 |                      |                                   |                                        |              |   |   |   |
| 22 | RESPONSE:          |                 |                      |                                   |                                        |              |   |   |   |
| 23 |                    |                 |                      |                                   |                                        |              |   |   |   |

|    | A                         | B                          | C                               | D                                                 | E                                                          | F                   | G | H | I |
|----|---------------------------|----------------------------|---------------------------------|---------------------------------------------------|------------------------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b> | <b>GBSA Term<br/>Loans</b> | <b>GBSA Lines<br/>of Credit</b> | <b>Commercial/<br/>Real Estate<br/>Term Loans</b> | <b>Commercial/<br/>Real Estate<br/>Lines of<br/>Credit</b> | <b>Credit cards</b> |   |   |   |
| 24 | ✓                         |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 25 | RESPONSE:                 |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 26 |                           |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 27 | ✓                         |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 28 | RESPONSE:                 |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 29 |                           |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 30 | ✓                         |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 31 | RESPONSE:                 |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 32 |                           |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 33 |                           |                            |                                 |                                                   |                                                            |                     |   |   |   |

|    | A                                                                                                               | B               | C                    | D                                 | E                                      | F            | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------|-----------------|----------------------|-----------------------------------|----------------------------------------|--------------|---|---|---|
| 7  | Business Loan Type                                                                                              | GBSA Term Loans | GBSA Lines of Credit | Commercial/Real Estate Term Loans | Commercial/Real Estate Lines of Credit | Credit cards |   |   |   |
| 34 | <b>Alerts, Notifications or Warnings From a Consumer Reporting Agency</b>                                       |                 |                      |                                   |                                        |              |   |   |   |
| 35 | A fraud or active duty alert is included with a consumer report.                                                |                 |                      |                                   |                                        |              |   |   |   |
| 36 | RESPONSE:                                                                                                       |                 |                      |                                   |                                        |              |   |   |   |
| 37 | A consumer reporting agency provides a notice of credit freeze in RESPONSE: to a request for a consumer report. |                 |                      |                                   |                                        |              |   |   |   |
| 38 | RESPONSE:                                                                                                       |                 |                      |                                   |                                        |              |   |   |   |
| 39 | A consumer reporting agency provides a notice of address discrepancy.                                           |                 |                      |                                   |                                        |              |   |   |   |
| 40 | RESPONSE:                                                                                                       |                 |                      |                                   |                                        |              |   |   |   |

|    | A                                                                                                                                                         | B                          | C                               | D                                                 | E                                                          | F                   | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------------|---------------------------------------------------|------------------------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b>                                                                                                                                 | <b>GBSA Term<br/>Loans</b> | <b>GBSA Lines<br/>of Credit</b> | <b>Commercial/<br/>Real Estate<br/>Term Loans</b> | <b>Commercial/<br/>Real Estate<br/>Lines of<br/>Credit</b> | <b>Credit cards</b> |   |   |   |
| 41 | A consumer report indicates a pattern of activity that is inconsistent with the history and usual pattern of activity of an applicant or member, such as: |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 42 |                                                                                                                                                           |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 43 | a. A recent and significant increase in the volume of inquiries;                                                                                          |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 44 | <b>RESPONSE:</b>                                                                                                                                          |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 45 | b. An unusual number of recently established credit relationships;                                                                                        |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 46 | <b>RESPONSE:</b>                                                                                                                                          |                            |                                 |                                                   |                                                            |                     |   |   |   |

|    | A                                                                                                                             | B                          | C                               | D                                                 | E                                                          | F                   | G | H | I |
|----|-------------------------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------------|---------------------------------------------------|------------------------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b>                                                                                                     | <i>GBSA Term<br/>Loans</i> | <i>GBSA Lines<br/>of Credit</i> | <i>Commercial/<br/>Real Estate<br/>Term Loans</i> | <i>Commercial/<br/>Real Estate<br/>Lines of<br/>Credit</i> | <i>Credit cards</i> |   |   |   |
| 47 | c. A material change in the use of credit, especially with respect to recently established credit relationships; or           |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 48 | RESPONSE:                                                                                                                     |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 49 | d. An account that was closed for cause or identified for abuse of account privileges by a financial institution or creditor. |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 50 | RESPONSE:                                                                                                                     |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 51 | <b>Suspicious Documents</b>                                                                                                   |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 52 | Documents provided for identification appear to have been altered or forged.                                                  |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 53 | RESPONSE:                                                                                                                     |                            |                                 |                                                   |                                                            |                     |   |   |   |

|    | A                                                                                                                                                                        | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b>                                                                                                                                                | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 54 | The photograph or physical description on the identification is not consistent with the appearance of the applicant or member presenting the identification.             |                        |                             |                                          |                                               |                     |   |   |   |
| 55 | RESPONSE:                                                                                                                                                                |                        |                             |                                          |                                               |                     |   |   |   |
| 56 | Other information on the identification is not consistent with information provided by the person opening a new covered account or member presenting the identification. |                        |                             |                                          |                                               |                     |   |   |   |
| 57 | RESPONSE:                                                                                                                                                                |                        |                             |                                          |                                               |                     |   |   |   |
| 58 | Other information on the identification is not consistent with readily accessible information that is on file, such as a signature card or a recent check.               |                        |                             |                                          |                                               |                     |   |   |   |
| 59 | RESPONSE:                                                                                                                                                                |                        |                             |                                          |                                               |                     |   |   |   |

|    | A                                                                                                                                                   | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b>                                                                                                                           | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 60 | An application appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled.                            |                        |                             |                                          |                                               |                     |   |   |   |
| 61 | <b>RESPONSE:</b>                                                                                                                                    |                        |                             |                                          |                                               |                     |   |   |   |
| 62 | <b>Suspicious Personal Identifying Information</b>                                                                                                  |                        |                             |                                          |                                               |                     |   |   |   |
| 63 | Personal identifying information provided is inconsistent when compared against external information sources used by the credit union. For example: |                        |                             |                                          |                                               |                     |   |   |   |
| 64 |                                                                                                                                                     |                        |                             |                                          |                                               |                     |   |   |   |
| 65 | a. The address does not match any address in the consumer report; or                                                                                |                        |                             |                                          |                                               |                     |   |   |   |
| 66 | <b>RESPONSE:</b>                                                                                                                                    |                        |                             |                                          |                                               |                     |   |   |   |
| 67 | b. The Social Security Number (SSN) has not been issued, or is listed on the Social Security Administration's Death Master File.                    |                        |                             |                                          |                                               |                     |   |   |   |

|    | A                                                                                                                                                                                                                                                                                                                            | B               | C                    | D                                 | E                                      | F            | G | H | I |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------------|-----------------------------------|----------------------------------------|--------------|---|---|---|
| 7  | Business Loan Type                                                                                                                                                                                                                                                                                                           | GBSA Term Loans | GBSA Lines of Credit | Commercial/Real Estate Term Loans | Commercial/Real Estate Lines of Credit | Credit cards |   |   |   |
| 68 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                 |                      |                                   |                                        |              |   |   |   |
| 69 | Personal identifying information provided by the member is not consistent with other personal identifying information provided by the member. For example, there is a lack of correlation between the SSN range and date of birth.                                                                                           |                 |                      |                                   |                                        |              |   |   |   |
| 70 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                 |                      |                                   |                                        |              |   |   |   |
| 71 | Personal identifying information provided is associated with known fraudulent activity as indicated by internal or third-party sources used by the federal credit union. For example: The address or telephone number on an application is the same as the address or telephone number provided on a fraudulent application. |                 |                      |                                   |                                        |              |   |   |   |
| 72 | RESPONSE:                                                                                                                                                                                                                                                                                                                    |                 |                      |                                   |                                        |              |   |   |   |

|    | A                                                                                                                                                                                          | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b>                                                                                                                                                                  | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 73 | Personal identifying information provided is of a type commonly associated with fraudulent activity as indicated by internal or third-party sources used by the credit union. For example: |                        |                             |                                          |                                               |                     |   |   |   |
| 74 |                                                                                                                                                                                            |                        |                             |                                          |                                               |                     |   |   |   |
| 75 | a. The address on an application is fictitious, a mail drop, or prison; or                                                                                                                 |                        |                             |                                          |                                               |                     |   |   |   |
| 76 | <b>RESPONSE:</b>                                                                                                                                                                           |                        |                             |                                          |                                               |                     |   |   |   |
| 77 | b. The phone number is invalid, or is associated with a pager or answering service.                                                                                                        |                        |                             |                                          |                                               |                     |   |   |   |
| 78 | <b>RESPONSE:</b>                                                                                                                                                                           |                        |                             |                                          |                                               |                     |   |   |   |
| 79 | The SSN provided is the same as that submitted by other persons opening an account or other members.                                                                                       |                        |                             |                                          |                                               |                     |   |   |   |
| 80 | <b>RESPONSE:</b>                                                                                                                                                                           |                        |                             |                                          |                                               |                     |   |   |   |

|    | A                                                                                                                                                                                                         | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b>                                                                                                                                                                                 | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 81 | The address or telephone number provided is the same as or similar to those submitted by an unusually large number of other persons opening accounts or other members.                                    |                        |                             |                                          |                                               |                     |   |   |   |
| 82 | <b>RESPONSE:</b>                                                                                                                                                                                          |                        |                             |                                          |                                               |                     |   |   |   |
| 83 | The person opening the covered account or the member fails to provide all required personal identifying information on an application or in RESPONSE: to notification that the application is incomplete. |                        |                             |                                          |                                               |                     |   |   |   |
| 84 | <b>RESPONSE:</b>                                                                                                                                                                                          |                        |                             |                                          |                                               |                     |   |   |   |
| 85 | Personal identifying information provided is not consistent with personal identifying information that is on file with the credit union.                                                                  |                        |                             |                                          |                                               |                     |   |   |   |
| 86 | <b>RESPONSE:</b>                                                                                                                                                                                          |                        |                             |                                          |                                               |                     |   |   |   |

|    | A                                                                                                                                                                                                                                             | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7  | <b>Business Loan Type</b>                                                                                                                                                                                                                     | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 87 | The person opening the covered account or the member cannot provide authenticating information beyond that which generally would be available from a wallet or consumer report.                                                               |                        |                             |                                          |                                               |                     |   |   |   |
| 88 | <b>RESPONSE:</b>                                                                                                                                                                                                                              |                        |                             |                                          |                                               |                     |   |   |   |
| 89 | <b><i>Unusual Use of, or Suspicious Activity Related to, the Covered Account</i></b>                                                                                                                                                          |                        |                             |                                          |                                               |                     |   |   |   |
| 90 | Shortly following the notice of a change of address for a covered account, the institution or creditor receives a request for a new, additional, or replacement card or a cell phone, or for the addition of authorized users on the account. |                        |                             |                                          |                                               |                     |   |   |   |
| 91 | <b>RESPONSE:</b>                                                                                                                                                                                                                              |                        |                             |                                          |                                               |                     |   |   |   |
| 92 | A new revolving credit account is used in a manner commonly associated with known patterns of fraud patterns. For example:                                                                                                                    |                        |                             |                                          |                                               |                     |   |   |   |
| 93 |                                                                                                                                                                                                                                               |                        |                             |                                          |                                               |                     |   |   |   |

|     | A                                                                                                                                                         | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7   | <b>Business Loan Type</b>                                                                                                                                 | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 94  | a. The member fails to make the first payment or makes an initial payment but no subsequent payments; or                                                  |                        |                             |                                          |                                               |                     |   |   |   |
| 95  | <b>RESPONSE:</b>                                                                                                                                          |                        |                             |                                          |                                               |                     |   |   |   |
| 96  | b. The majority of available credit is used for cash advances or merchandise that is easily convertible to cash (e.g., electronics equipment or jewelry); |                        |                             |                                          |                                               |                     |   |   |   |
| 97  | <b>RESPONSE:</b>                                                                                                                                          |                        |                             |                                          |                                               |                     |   |   |   |
| 98  | A covered account is used in a manner that is not consistent with established patterns of activity on the account. There is, for example:                 |                        |                             |                                          |                                               |                     |   |   |   |
| 99  | <b>RESPONSE:</b>                                                                                                                                          |                        |                             |                                          |                                               |                     |   |   |   |
| 100 | a. Nonpayment when there is no history of late or missed payments;                                                                                        |                        |                             |                                          |                                               |                     |   |   |   |

|     | A                                                                                               | B                          | C                               | D                                                 | E                                                          | F                   | G | H | I |
|-----|-------------------------------------------------------------------------------------------------|----------------------------|---------------------------------|---------------------------------------------------|------------------------------------------------------------|---------------------|---|---|---|
|     |                                                                                                 | <i>GBSA Term<br/>Loans</i> | <i>GBSA Lines<br/>of Credit</i> | <i>Commercial/<br/>Real Estate<br/>Term Loans</i> | <i>Commercial/<br/>Real Estate<br/>Lines of<br/>Credit</i> | <i>Credit cards</i> |   |   |   |
| 7   | <b>Business Loan Type</b>                                                                       |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 101 | RESPONSE:                                                                                       |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 102 | b. A material increase in the use of available credit;                                          |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 103 | RESPONSE:                                                                                       |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 104 | c. A material change in purchasing or spending patterns; or                                     |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 105 | RESPONSE:                                                                                       |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 106 | d. A material change in electronic fund transfer patterns in connection with a deposit account. |                            |                                 |                                                   |                                                            |                     |   |   |   |
| 107 | RESPONSE:                                                                                       |                            |                                 |                                                   |                                                            |                     |   |   |   |

|     | A                                                                                                                                                                                                   | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7   | <b>Business Loan Type</b>                                                                                                                                                                           | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 108 | A covered account that has been inactive for a reasonably lengthy period of time is used (taking into consideration the type of account, the expected pattern of usage and other relevant factors). |                        |                             |                                          |                                               |                     |   |   |   |
| 109 | <b>RESPONSE:</b>                                                                                                                                                                                    |                        |                             |                                          |                                               |                     |   |   |   |
| 110 | Mail sent to the member is returned repeatedly as undeliverable although transactions continue to be conducted in connection with the member's covered account.                                     |                        |                             |                                          |                                               |                     |   |   |   |
| 111 | <b>RESPONSE:</b>                                                                                                                                                                                    |                        |                             |                                          |                                               |                     |   |   |   |
| 112 | The credit union is notified that the member is not receiving paper account statements.                                                                                                             |                        |                             |                                          |                                               |                     |   |   |   |
| 113 | <b>RESPONSE:</b>                                                                                                                                                                                    |                        |                             |                                          |                                               |                     |   |   |   |

|     | A                                                                                                                                                                                                      | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7   | <b>Business Loan Type</b>                                                                                                                                                                              | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 114 | The credit union is notified of unauthorized charges or transactions in connection with a member's covered account.                                                                                    |                        |                             |                                          |                                               |                     |   |   |   |
| 115 | <b>RESPONSE:</b>                                                                                                                                                                                       |                        |                             |                                          |                                               |                     |   |   |   |
| 116 | <b>Notice From Members or Others Regarding Possible ID Theft</b>                                                                                                                                       |                        |                             |                                          |                                               |                     |   |   |   |
| 117 | The credit union is notified by a member, a victim of identity theft, a law enforcement authority, or any other person that it has opened a fraudulent account for a person engaged in identity theft. |                        |                             |                                          |                                               |                     |   |   |   |
| 118 | <b>RESPONSE:</b>                                                                                                                                                                                       |                        |                             |                                          |                                               |                     |   |   |   |

|     | A                                                                                                                    | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|-----|----------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7   | <b>Business Loan Type</b>                                                                                            | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 119 | <b>Other Red Flags</b>                                                                                               |                        |                             |                                          |                                               |                     |   |   |   |
| 120 | The name of an employee of the financial institution or creditor has been added as an authorized user on an account. |                        |                             |                                          |                                               |                     |   |   |   |
| 121 | RESPONSE:                                                                                                            |                        |                             |                                          |                                               |                     |   |   |   |
| 122 | An employee has accessed or downloaded an unusually large number of customer account records.                        |                        |                             |                                          |                                               |                     |   |   |   |
| 123 | RESPONSE:                                                                                                            |                        |                             |                                          |                                               |                     |   |   |   |
| 124 | The credit union detects attempts to access a customer's account by unauthorized persons.                            |                        |                             |                                          |                                               |                     |   |   |   |
| 125 | RESPONSE:                                                                                                            |                        |                             |                                          |                                               |                     |   |   |   |

|     | A                                                                                                                      | B                      | C                           | D                                        | E                                             | F                   | G | H | I |
|-----|------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------|------------------------------------------|-----------------------------------------------|---------------------|---|---|---|
| 7   | <b>Business Loan Type</b>                                                                                              | <b>GBSA Term Loans</b> | <b>GBSA Lines of Credit</b> | <b>Commercial/Real Estate Term Loans</b> | <b>Commercial/Real Estate Lines of Credit</b> | <b>Credit cards</b> |   |   |   |
| 126 | The credit union detects or is informed of unauthorized access to a customer's personal information.                   |                        |                             |                                          |                                               |                     |   |   |   |
| 127 | <b>RESPONSE:</b>                                                                                                       |                        |                             |                                          |                                               |                     |   |   |   |
| 128 | There are unusually frequent and large check orders in connection with a customer's account.                           |                        |                             |                                          |                                               |                     |   |   |   |
| 129 | <b>RESPONSE:</b>                                                                                                       |                        |                             |                                          |                                               |                     |   |   |   |
| 130 | The person opening the account or the customer is unable to lift a credit freeze placed on his or her consumer report. |                        |                             |                                          |                                               |                     |   |   |   |
| 131 | <b>RESPONSE:</b>                                                                                                       |                        |                             |                                          |                                               |                     |   |   |   |

**Cell:** A34

**Comment:** Does the credit union obtain consumer reports for covered accounts? If so, does the staff check the report for the issues listed above?

**Cell:** A67

**Comment:** [Does the credit union make it a policy to check the Death Master File? Does it have resources to find out whether an SSN has been issued?

**Cell:** A69

**Comment:** Some vendors may provide information on the year a SSN became available and in what state. Does the credit union have a vendor that can do this?

**Cell:** A71

**Comment:** Can the credit union's system "flag" an address or telephone number from a fraudulent application, to alert staff if the same address or number is provided again in the future?

**Cell:** A77

**Comment:** Can/does the credit union check these things?

**Cell:** A79

**Comment:** Does the credit union have a system to cross-check SSNs?

**Cell:** A81

**Comment:** Does the credit union have a system to identify addresses or telephone numbers provided by other applicants or members?

**Cell:** A83

**Comment:** Does the credit union follow up on incomplete applications to see if missing information is supplied?

**Cell:** A87

**Comment:** Does staff ask "challenge questions," to elicit information the real member should know?

**Cell:** A90

**Comment:** Does the credit union have procedures in place to alert staff of a recent change in address on a covered account?

**Cell:** A96

**Comment:** Can the credit union's system identify such transactions and flag them for staff?

**Cell:** A106

**Comment:** Does the credit union have resources to monitor “patterns of activity” on accounts?

**Cell:** A108

**Comment:** Does your system alert you to transactions on inactive accounts?

**Cell:** A110

**Comment:** Is an account flagged if mail is returned as undeliverable?

**Cell:** A120

**Comment:** Can your system monitor and detect when any employee’s name has been added to an account?

**Cell:** A122

**Comment:** Can your system detect in a practical manner whether employees have accessed or downloaded an unusually large number of customer account records?

**Cell:** A128

**Comment:** Would a check vendor notify the credit union of an unusual request? Would this necessarily indicate possible identity theft?

**Cell:** A130

**Comment:** Commenters to the proposed rule objected to this red flag being included in the list. How would the credit union know that the applicant is unable to lift a credit freeze? What if the member simply chose not to? What action would/could the credit union take in this situation?

**Regulator recommended responses**

- Monitoring a covered account for evidence of identity theft;
- Contacting the member;
- Changing any passwords, security codes, or other security device that permit access to a covered account;
- Reopening a covered account with a new account number;
- Not opening a new covered account;
- Closing an existing covered account;
- Not attempting to collect on a covered account or not selling a covering account to a debt collector;
- Notifying law enforcement;
- Filing a Suspicious Activity Report; or
- Determining that no response is warranted under the particular circumstances.