

RESOLUTION NO. R-11-006

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF MANATEE COUNTY, FLORIDA, REGARDING MANATEE COUNTY PARKS AND RECREATION DEPARTMENT IDENTITY THEFT PREVENTION PROGRAM.

WHEREAS, Manatee County Parks and Recreation Department finds that identity theft is a serious problem for recreation providers in the United States; and

WHEREAS, in response to the risks posed by identity theft to consumers and to the financial soundness of businesses, the United States Congress enacted the Fair and Accurate Credit Transactions Act of 2003 (FACT Act); and

WHEREAS, the Federal Trade Commission (FTC), along with federal bank regulators, adopted regulations (the Red Flag Rules) implementing the FACT Act that requires creditors to adopt a written Identity Theft Prevention Program; and

WHEREAS, Manatee County Parks and Recreation Department believes it is a creditor subject to the FTC's Red Flag Rules; and

WHEREAS, Manatee County Parks and Recreation Department has developed a written Identity Theft Prevention Program designed to detect, prevent and mitigate identity theft.

NOW, THEREFORE, BE IT RESOLVED, by the Board of County Commissioners of Manatee County, Florida:

- (1) The Board of County Commissioners hereby approves the Red Flag Identity Theft Prevention Program as submitted.
- (2) Dinorah DiFonzo, Fiscal Services Manager, is hereby delegated responsibility for oversight, ongoing development, implementation, and administration of the program and shall have the responsibility to develop periodic updates to the program to reflect changes in risk to customers and to the safety and soundness of the organization.

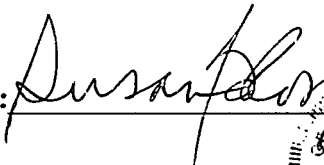
BE IT FURTHER RESOLVED that this resolution shall be effective as of January 11, 2011.

PASSED AND DULY ADOPTED with a quorum present and voting this 11th day of January 11, 2011.

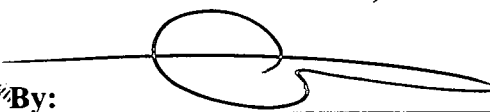
ATTEST: R.B. SHORE
Clerk of the Circuit Court

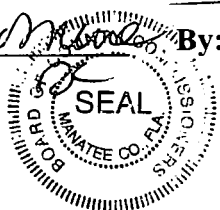
BOARD OF COUNTY COMMISSIONERS
OF MANATEE COUNTY, FLORIDA

By: _____



By: _____





**MANATEE COUNTY
PARKS & RECREATION DEPARTMENT**

IDENTITY THEFT PREVENTION PROGRAM

Effective January 11, 2011

I. PROGRAM DESCRIPTION

Manatee County Parks & Recreation is committed to providing all aspects of our service and conducting our business operations in compliance with all applicable laws and regulations. This policy sets forth our commitment to compliance with those standards established by the Federal Trade Commission's Fair and Accurate Credit Transactions Act of 2003 ("Red Flag Rules"). This ACT requires creditors to establish a written Identity Theft Prevention Program that is designed to detect, prevent, and mitigate identity theft in connection with the opening of a covered account or any existing account.

II. SCOPE

This program contains policies and procedures designed to identify, detect and respond appropriately to "Red Flags" for identity theft. It also contains policies and procedures for the periodic identification of covered accounts and for the general administration of the Identity Theft Prevention Program. This Program addresses our general approach to compliance with the Red Flag Rules. As a creditor, the Parks & Recreation Department is required to:

- Periodically identify covered accounts;
- Establish a written Identity Theft Prevention Program;
- Ensure the program is updated periodically to reflect changes in risk from identity theft; and
- Administer the Identity Theft Prevention Program.

III. DEFINITIONS

- a) "Account" means a continuing relationship established by a person with the Parks & Recreation Department to obtain services for personal, family or business purposes.
- b) "Covered Account" means an account the Parks & Recreation Department offers or maintains, primarily for personal, family or business purposes that involves or is designed to permit multiple payments or transactions.
- c) "Identity theft" means a fraud committed or attempted using the identifying information of another person without authority.
- d) "Identifying information" means any name or number that may be used, alone or in conjunction with any other information, to identify a specific person, including any:
 1. Name, address, date of birth, official state or government issued driver's license or identification number, government passport number or taxpayer identification number;

2. Unique electronic identification number, address or routing code.
- e) "Program" means this written Identity Theft Prevention Program developed and implemented by the Parks & Recreation Department.
- f) "Red Flag" means a pattern, practice or specific activity that indicates the possible existence of identity theft.

IV. TYPES OF ACCOUNTS

The Parks & Recreation Department maintains the following type of covered accounts:

- Automatic bank draft payments
- Online transactions

V. IDENTIFYING RED FLAGS

Parks & Recreation Department shall consider the follow factors in identifying relevant Red Flags for covered accounts, as appropriate:

- The types of covered accounts it offers or maintains;
- The methods it provides to open its covered accounts;
- The methods it provides to access its covered accounts; and
- Any incidents of identity theft that the Parks & Recreation Department has experienced.

VI. PREVENTION AND MITIGATION

Below are processes to be used to reduce or eliminate identity theft for each transaction:

- a) Automatic Bank Draft Payments
 - The appropriate identifying information is required to open a covered account in which automatic bank draft payments will be made.
 - Automatic Bank Draft forms; voided checks and identifying information are scanned onto a CD that is securely stored, after which paper documentation is shredded.
 - Bank account numbers are encrypted in the software application and cannot be viewed after account establishment.
- b) Online Transactions

- Parks & Recreation Department provides online access to limited account information and the ability to pay electronically.
- Online payment service is provided by a third party, Bank of America with Cyber Source as the host.
- Security coding is provided by the third party host for all online transactions.

VII. PROGRAM REVIEW, UPDATE, ADMINISTRATION AND OVERSIGHT

This program shall be reviewed and updated annually, as needed to reflect changes in processes, business transactions, covered accounts or other changes that may increase or change the risk of identity theft as it relates to the business of the Parks & Recreation Department.

The Fiscal Services Manager, Dinorah DiFonzo, shall oversee the program guidelines, review customer documentation and ensure staff training. A possible identity theft complaint or incident should be reported to the local law enforcement if necessary and/or deemed appropriate by the Parks & Recreation Department Management staff.