

[NAME OF COMPANY]

**Identity Theft Prevention Program**

**Risk Assessment Form**

*The Company's Identity Theft Prevention Program must contain reasonable policies and procedures designed to detect, prevent and mitigate identity theft in connection with the origination and/or maintenance of all Covered Accounts.*

*This form is intended to assist the Red Flags Manager in determining whether the Company offers or maintains "Covered Accounts" that must be addressed in the Company's Identity Theft Prevention Program. In making this determination, the Red Flags Manager should consider:*

- (1) *The methods the Company provides to open its accounts;*
- (2) *The methods the Company provides to access its accounts; and*
- (3) *The Company's previous experiences with identity theft.*

**"Covered Account"** means:

- *An account that the Company offers or maintains, primarily for personal, family or household purposes, that involves or is designed to permit multiple payments or transactions, such as a loan or deposit account; and*
- *Any other account that the Company offers for which there is a reasonably foreseeable risk to customers or to the financial safety and soundness of the Company from identity theft.*

*For the purposes of this risk assessment, all of the Company's consumer transactions are "Covered Accounts." Commercial transactions will be Covered Accounts if the Company determines they present a **reasonably foreseeable** risk of identity theft. Where applicable, boxes have already been checked to indicate best practices.*

(1) Can be VIEWED upon the PURCHASE of FULL VERSION

Yes

No

**What risk factors are associated with this type of transaction?**

- Methods Provided to Open Account: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- Methods Provided to Access Account: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- Previous Experiences with Identity Theft? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Is this type of transaction a Covered Account?**

(2) You can VIEW this upon the PURCHASE of FULL VERSION

Yes  No

(3) Does this transaction involve You can VIEW this upon the PURCHASE of FULL VERSION

Yes  No

(4) If your answer is "Yes" to both of the above questions, this type You can VIEW this upon the PURCHASE of FULL VERSION

If your answer is "No" to either of the above questions, go to question (3).

(5) Is there a reasonably foreseeable risk to customers o You can VIEW this upon the PURCHASE of FULL VERSION

Yes  No

If your answer to this question is "Yes," this type of transaction is a Covered Account.

If your answer to this question is "No," please explain why you believe that this type of transaction does not create a reasonably foreseeable risk to customers or to the financial safety and soundness of the Company from identity theft.