



Identity Theft Update

NPPD Board of Directors Customer & Support Services Committee September 2025

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Red Flag Rules

Fair and Accurate Credit Transactions Act of 2003 amended in 2008 to include "Red Flag Rules."

Four requirements:

- 1) Identify Relevant Red Flags (NPPD has identified 5)
 - Suspicious Personal Identifying Information
 - Presentation of Suspicious Documents
 - Suspicious Activity Related to Customer Accounts
 - Notice Regarding Possible Identity Theft
 - Notice Regarding Identity Theft Where Customer Account is Not Affected
- 2) Detect Red Flags
- 3) Prevent and Mitigate Identity Theft
- 4) Update Program

Annual Requirements

- NPPD Identity Theft Prevention Program approved by Board in 2009 — IMS-PR-004.
 - Reviewed and updated by staff at least annually.
 - Yearly update on the Program is to be provided to board as required by FTC regulations.
- In addition to NPPD looking for red flags, customers can also report concerns about identity theft in relation to their utility accounts to NPPD.
 - Personal Identification Number (PIN) added in 2017.

Annual Report

- Changes made to IMS-PR-004 in 2024:
 - Updated legal position titles and reviewer status for alignment.
 - Minor verbiage changes.
- Two reports of suspected identity theft in the last year.
- NPPD Customer Service Staff receive annual training on IMS-PR-004 and continue to look for red flags in day-to-day interactions with customers.



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Questions

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