



## Agenda Report

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**FROM:** Robert Thompson, General Manager  
Originator: Wally Ritchie, Director of Finance

**SUBJECT:**

**UPDATE TO POSITION TITLES IN THE IDENTITY THEFT PREVENTION PROGRAM**

**GENERAL MANAGER'S RECOMMENDATION**

RECOMMENDATION: Recommend to the Board of Directors to:

Adopt Resolution No. OC SAN 23-18 entitled: "A Resolution of the Board of Directors of the Orange County Sanitation District Adopting an Update to the Identity Theft Prevention Program in order to comply with the Fair and Accurate Credit Transaction Act of 2003; and Repealing Resolution No. OCSD 09-03".

### **BACKGROUND**

This program was created in order to comply with regulations issued by the Federal Trade Commission (FTC) as part of the implementation of the Fair and Accurate Credit Transaction (FACT) Act of 2003. The FACT Act requires that financial institutions and creditors implement written programs which provide for detection of and response to specific activities ("red flags") that could be related to identity theft.

Recent position title and personnel changes at Orange County Sanitation District (OC San) brought about the need to update this resolution and program to make it current.

### **RELEVANT STANDARDS**

- Comply with Federal Trade Commission regulations

### **PROBLEM**

The current Resolution and program is out of date due to title and personnel changes.

### **PROPOSED SOLUTION**

Update the Resolution and program to reflect current titles and personnel.

## **TIMING CONCERNS**

N/A

## **RAMIFICATIONS OF NOT TAKING ACTION**

OC San will be out of compliance with the FACT Act of 2003.

## **PRIOR COMMITTEE/BOARD ACTIONS**

April 2009 - Adopted Resolution No. OCSD 09-03, Adopting an Identity Theft Prevention Program in order to comply with the Fair and Accurate Credit Transaction Act of 2003.

## **ADDITIONAL INFORMATION**

N/A

## **CEQA**

N/A

## **FINANCIAL CONSIDERATIONS**

N/A

## **ATTACHMENT**

*The following attachment(s) may be viewed on-line at the OC San website ([www.ocsan.gov](http://www.ocsan.gov)) with the complete agenda package:*

- Resolution No. OC SAN 23-18 (Redlined)
- Resolution No. OC SAN 23-18 (Final)