

LA PLATA ELECTRIC ASSOCIATION, INC.
DURANGO, COLORADO

Board of Directors Policy

Subject: Identity Theft Prevention Program		Policy No: 212	
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I. OBJECTIVE

- A. To comply with the requirements of the Federal Trade Commission Rules and Regulations (16 CFR Part 681.2).
- B. To establish a program to detect, prevent and mitigate identity theft in connection with the opening of an account or an existing account.

II. POLICY

- A. The Chief Executive Officer (CEO) and the Chief Financial Officer (CFO) will be responsible for oversight, development, implementation and administration of the Identity Theft Prevention Program.
- B. "Red Flags" applicable to LPEA will be identified and procedures developed to detect and then respond when a "Red Flag" is identified.
- C. Training for the employees will be provided as necessary.
- D. As additional risk factors are discovered the policy and program will be revised to address any future risks.
- E. The CEO and CFO will report to the Board of Directors immediately any incidents of any identity theft or breach of records that occur.
- F. An annual report will be prepared and presented to the Board of Directors on compliance with the program and any incidents experienced for the year.
The report will include:
 - a. The effectiveness of the policies and procedures in addressing the risk of identity theft
 - b. Significant incidents that have occurred and managements' response
 - c. Recommendations for changing the program

III. RESPONSIBILITY

The CEO is responsible for the administration of this policy.

9/17/08

Date



Secretary