



THE LANDLORDSOURCE
RED FLAGS OFFICE POLICY MANUAL
Outline, FORMS, and Excerpts

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Introduction

- What is the Red Flags Rule?
- Does the Company Need to Comply?
- Reasons we are at risk
- What do we need to do?

1 - Identifying Relevant Red Flags

2 - Detect Red Flags

- Red Flags – Behavior
- Red Flags – Confidentiality
- Red Flags - Taking Identification
- Red Flags – Application Documentation
- Red Flags – Running a Credit Report
- Red Flags – All Credit Card payments
- Red Flags – Prior to Renting
- Red Flags – After Renting
- Red Flags – Sales Activity

3 - Prevent and Mitigate Identity Theft

- Confidentiality
- Personal information disclosure
- Office Security
- Resolving Red Flags Rule Issues
- Applicable Service Providers

4 – Maintain and Update the Red Flags Rule Program

- Personnel Cooperation and Responsibilities
- Personnel Training
- Policy Review

Forms Included in Red Flags product:

1. Red Flags Office Worksheet – this document will help company owners or managers document any Red Flags Rule Incident.
2. Red Flags Rule Acknowledgement Form - this should be a required form once personnel read the Red Flags Office Policy Manual.
3. Confidentiality Agreement – another important form that all Personnel should sign as soon as possible that they will not share any company information.
4. Flags Incident Report Form – this is a convenient form for Personnel to fill out when something occurs and starts the documentation needed.
5. Red Flags Incident Review – this document follows through until a solution is achieved regarding a Red Flags incident.

Excerpts

Reasons we are at risk

The FTC defines identifying information as any name or number that may be used, alone or in conjunction with any other information, to identify a specific person, including, but not limited to: name, social security number, date of birth, official state or government driver's license or identification number, alien registration number, government passport number, employer or taxpayer identification number.¹

If any of the following does not apply to your company, delete or reword as necessary.

Because of this definition, Management has identified areas where it is necessary to have a policy in our office to cover the Red Flags Rule.

- (Company Name) interacts with many people that we do not personally know and requires various forms of identification to rent to unknown parties,

¹ Fighting Fraud with the Red Flags Rule, a How-to Guide for Business, Federal Trade Commission

Excerpts

Red Flags – Behavior

Although these red flags may not be identifying information, Personnel should watch for behavioral signs as red flags could indicate other problems related to identity theft.

- The applicants exhibit nervousness or unusual sweating
- The applicants become difficult and/or abusive.
- The applicants are not what they represent.
- The applicants will not fill out the application completely.
- The applicants will not supply required documentation.

SAMPLE

Personal information disclosure

Personnel need to be aware of the importance of protecting all personal information or identifying information and comply with the following:

- Personnel are to keep all information with identifying information secure at all times.
- Personnel are not to leave documentation unattended. All documentation should be stored properly before:
 - Leaving their work station
 - Leaving the office for any reason, such as lunch, end of work day, or special appointments
 - Examples, applications should not be left unattended on the reception desk; listing and sales information should not be left unattended on Sales Agents desk or Sales Agent's assistant's desk.