

SPRING-BENNER-WALKER JOINT AUTHORITY

REGULAR MEETING

April 12, 2021

ATTENDANCE:

AUTHORITY MEMBERS:	Spring	Toby Dashner Joseph Galbraith Gregg Heny Chris McMurtrie
	Benner	Dan Hoffman Willis Houser, Jr.
	Walker	Dennis McDowell Joseph Swanderski

GUESTS: None present.

CONSULTING ENGINEER: Andy Johnson, P.E.

CONSULTING SOLICITOR: Robert Mix, Esq.

EXECUTIVE DIRECTOR: N. Warren Miller

EMPLOYEES: Will Barton, Tasha Dutton & Kelly Gill

CALL TO ORDER:

The April 12, 2021, Regular Meeting of the Spring-Benner-Walker Joint Authority was called to order at 7:00 P.M. by Dennis McDowell, Chairman. Mr. McDowell thanked everyone for attending and stated that the meeting would be recorded for transcription purposes.

ROLL CALL:

Joseph Swanderski, Secretary, took Roll Call, recording eight members present. Mr. Book was excused from the meeting. Mr. McDowell, Chairman, noted that with a quorum present, the Spring-Benner-Walker Joint Authority was permitted to conduct business under the laws of Pennsylvania.

PLEDGE OF ALLEGIANCE:

Mr. McDowell, Chairman, led the Board members and Employees in the Pledge of Allegiance.

Mr. McDowell took a moment to welcome Mr. Heny and Mr. Hoffman back.

APPROVAL OF MEETING MINUTES:

Mr. McDowell asked the Board if there were any questions and/or changes to the March 22, 2021 meeting minutes as presented. **Mr. Galbraith moved, seconded by Mr. Hoffman to approve the Minutes of the March 22, 2021 Regular Meeting as presented. 8 ayes, 0 nays, 1 absent. The motion carried.**

CORRESPONDENCE:

PA Municipal Authorities Association (PMAA) – We received notification from PMAA that they will be holding their Board Member Training virtually on April 28, 2021 and April 29, 2021. Mr. Miller asked the Board members to contact the office staff if anyone is interested in participating.

APPROVAL OF PAYMENTS:

Approval of Requisitions:

Revenue Fund Requisition 2020-25 – Mr. McDowell asked if there were any questions regarding the presentation of Revenue Fund Requisition #2020-25. **Mr. Houser moved, seconded by Mr. Dashner to approve Revenue Requisition 2020-25 payable to SBWJA in the amount of \$521,993.61. 8 ayes, 0 nays, 1 absent. The motion carried.**

GUESTS: There were no Guests present for the meeting.

SYSTEM OVERVIEW REPORT:

Will Barton, Maintenance Crew Leader, provided an overview of the work completed on the sanitary sewer system for the month of March 2021.

In-Home Inspections - There were 21 in-home inspections completed in the month of March. Mr. Barton stated there were two (2) washing machines and a slop sink that were not connected to the sanitary sewer. An HVAC condensate line was also identified as discharging to the sanitary sewer and it has been removed.

Sewer Permits and/or Lateral Inspections - Our maintenance department completed three (3) sewer lateral inspections in March. There was one (1) in Steeplechase, one (1) in Springfield Development and one (1) at the University Park Airport. We also completed partial inspections within the Sunrise Mobile Home Park along the Benner Pike. The partial inspections were due to old terracotta and cast-iron pipe being replaced within their infrastructure. The office staff received two (2) new sewer permit applications in the amount of 2.00 EDUs.

System Maintenance – Our new 2021 Ford F-350 truck was delivered to D.K. Hostetler, Inc. to have our DEF line repaired because it was damaged during the installation of the utility body. The maintenance staff read the meter pits throughout the system and assisted in having our annual calibration of meters by The Meter Guy, LLC. We also had our self-contained breathing apparatus units annual inspections completed.

The maintenance department replaced 6" forcemain valves at Pump Station #5 (Mingoville) and Pump Station #16 (Benner Commerce). All wet wells and check valves were cleaned. The level sensors were also cleaned and calibrated.

There have been multiple callouts that have required the pump stations to be powered down and rebooted; therefore, the maintenance staff has tried powering down and rebooting all the pump stations and meter pits periodically to help eliminate these issues.

The grinder tank lid at the Dollar General (206 Cobblestone Road) was repaired due to a snowplow damaging it. Tar was placed around manhole PV-233 in Pleasant View due to a snowplow catching on the lid.

The chlorine feed system was repaired at Pump Station #7 (Zion Ridge) and the counter flashing of the building and exhaust fan has been replaced.

Our staff prepped and painted the pump skids at Pump Station #9 (Penn Eagle).

We prepared the tow behind generator for pick-up as it was sold through Municibid for \$2,800.00.

The Authority rented a skid-steer and angle brush attachment to clean up stone along our driveways at all of our pump stations and the office parking lot. We also borrowed a pavement roller from Benner Township to repair our pump station driveways.

Our staff installed a few manhole markers throughout the system. We raised a manhole and completed some grading work at Pump Station #14 (Litke) to help with the installation of an additional gate for easier access.

The maintenance department has been working on cutting down the 6" inspection view ports to ground level throughout the entire system to avoid broken caps. A new heater has been installed in the chlorine room along with a new generator block heater at Pump Station #6 (Rockview). Our push camera reel #3 had to be re-terminated.

Mr. Barton informed the Board of two (2) calls regarding backups, which consisted of homeowners having plugged sewer laterals due to grease buildup. We pulled manhole lids for a surveyor at the former Dunkelberger property, located between the Fullington Bus Station and The Village of Nittany Glen, so they could obtain invert elevations.

Mr. Barton attended a pre-construction meeting to discuss gas mainline replacements in Pleasant Gap and the construction of Logan Greene Phase 1A.

Our personnel assisted with two (2) sewer backups, one (1) in Brockerhoff Heights and one (1) in Spring Gardens, which were both due to the sewer laterals being at reverse grade, likely due to settling of the ground.

The maintenance department pulled pumps at Pump Station #15 (Sunnyside) and Pump Station #17 (The Mews) due to high run times. We performed push camera work for Fine Line Homes which consisted of checking a radon pipe in Springfield Development and verifying there were no sags or breaks in a sewer lateral in Spring Mills.

Benner Township Water Authority –The monthly analytical testing was performed and we read meters. We repaired the chlorine pump at the Grove Park well house and completed our quarterly blow offs at both systems. There were new pressure snubbers installed at Hampton Hills well house. All driveways to the well houses were stoned and rolled.

We had a site visit at 258 Edward Drive to discuss the proper way to have the old well connection to their home terminated. Our staff also investigated high water usage at 341 Millgate Road. There were 11 PA One Calls located in March.

Video Truck – Our personnel completed 8,694 feet of video inspection work in the Pleasant Gap and Logan Branch areas for the month of March. We also completed video work for Julian to assist in locating I & I within their system.

Vactor Truck – We jetted 8,694 feet of sewer main line in the Pleasant Gap and Logan Branch areas for the month of March. Our personnel used the Vac truck to clean the decant tank and Auger Monster pit for SCI Rockview. The wet well at Beaver Farms Apartments were also cleaned using the Vac truck.

Sewer Extensions – Our staff cut in a sewer tap for the American Top Team's new facility located at 147 Valor Court in Pleasant Gap. We also inspected the 6" sewer main line that was installed from the Pleasant Gap Baseball Field to American Top Team. Our staff reviewed and discussed the prints for Logan Greene Phase 1A with the ELA Group.

Inter – Municipal Work –The maintenance staff completed video work in a newly constructed development for Centre Hall/Potter Sewer Authority and assisted in locating I & I issues for Huston Township Sewer Authority.

Call Outs/ PA One Calls – There were seven (7) callouts for the month of March. We were called to the PA State Police Barracks for a sewer backup; however, we could not help them due to the clog being 100' back inside the building. There was a high level at Pump Station #5 (Mingoville), which was corrected once the pump station was rebooted.

Mr. Barton had an emergency PA One Call that was requested by Walker Township Water Association due to a water leak at 104 Cedar Lane. This water leak penetrated one (1) of our 6" laterals, which resulted in water being introduced into our sewer system. This water leak had caused higher than normal flows at Pump Station #7 (Zion Ridge) and has now been resolved.

Mr. Barton had received numerous high levels from Pump Station #6 (Rockview) and it was determined the high flows were due to a new water softener being installed at the Forestry Camp.

The homeowner of 230 Millgate Road called to have their water terminated due to water leaking into their basement. This leak was repaired and water service was restored to the property.

There were two (2) grinder pump alarm callouts. A new pump was installed at 808 Scenic Street and a new float tree was installed at 247 Meadow Flower Circle. Mr. Barton ended the report with a total of 204 PA One Calls being located in March.

EXECUTIVE DIRECTOR'S REPORT:

Pump Station #7 (Zion Ridge) Blower – During our March 22, 2021 meeting we discussed installing an aeration system within the wet well at Pump Station #7 (Zion Ridge) to assist in moving the suspended solids to the intake area of our wet well and Mr. Houser questioned how loud the blower would be. Mr. Miller stated he spoke with a representative from Envirep and they indicated the noise would be at approximately 65 decibels. Mr. Swanderski asked if this blower system would be an intermittent operation. Mr. Miller indicated the system will run continuous and will likely run 20 hours a day. The Board was provided with a packet of information regarding the new blower system to review. Mr. Miller asked the Board to review the packet and provide him with any comments or concerns they may have.

Musser Hill Subdivision Ordinance - Mr. Miller met with Vaughn Zimmerman, Spring Township Zoning Officer and Tracey Benson, Spring Township Solicitor on 02/10/2021 to discuss the proposed ordinance for the inspection/maintenance of the Orenco treatment systems within the Musser Hill Subdivision and at that time Spring Township was reluctant to pass an ordinance that allows us access to the Orenco systems that are located within private property.

Mr. Miller also indicated he has discussed this subject with Mr. Mix and Mr. Mix believes our Authority should consider not providing maintenance and repair of the Orenco systems and instead leave that up to the homeowners to handle.

Orenco requires these systems to be maintained with original Orenco components and the work performed by a trained technician. Mr. Miller indicated the closest trained technicians to complete work on the Orenco systems are located in Parkesburg, PA and Shippensburg, PA.

The Board was provided a letter that Mr. Miller drafted to the homeowners in the Musser Hill Subdivision explaining we are unable to assist with the maintenance needs of their Orenco systems and provided them with the contact information for someone that could help them. Mr. Miller stated that Spring Township has not contacted the Authority since our meeting and he feels that it is time to make the homeowners aware of their personal responsibilities of their Orenco systems. The Board reviewed the letter and suggested it be sent to the homeowners.

Act 537 Plan Special Study – Gwin, Dobson & Foreman has completed Addendum No. 1 for the Act 537 Plan Special Study and Mr. Miller delivered it to PA DEP on 4/5/2021. Mr. Miller discussed, with the Board, the letter he sent to PA DEP explaining Appendix C (County and Municipal Correspondence) of Addendum No. 1. The Authority is hoping PA DEP will approve the Act 537 Plan Special Study before Memorial Day.

Motorola APX 4000 Portable Radio – Mr. Miller indicated that one (1) of our portable radios is broken and can not be repaired because Motorola no longer services that particular model; therefore, we will need to purchase a replacement. A new Motorola APX 4000 Portable Radio will cost approximately \$2,588.33. **Mr. Hoffman moved, seconded by Mr. McMurtrie to approve the purchase of a new Motorola APX 4000 Portable Radio in the amount of \$2,588.33. 8 ayes, 0 nays, 1 absent. The motion carried.**

Pump Station #10 (Valley View) and Pump Station #11 (Jenny Gap) – During the March 22, 2021 Board meeting Mr. Houser inquired about the duplex pump control panels purchased from CW Sales Corporation being rather expensive. Mr. Miller indicated the control panels were specifically designed for our needs. The panels contain dry contacts for radio telemetry, a 100-amp receptacle for our generator to plug into and Square D electronics. The Board was asked to look at the control panels after the meeting to review the functions and quality of what was purchased for the upgrades to Pump Station #10 (Valley View) and Pump Station #11 (Jenny Gap). Mr. Houser asked what type of transfer switches the panels have. Mr. Miller indicated the transfer switches were manual.

SOLICITOR'S REPORT: Mr. Mix had nothing to discuss.

ENGINEER'S REPORT:

Act 537 Plan Special Study – Mr. Johnson indicated Gwin Dobson and Foreman had prepared Addendum No. 1 for the Act 537 Plan Special Study and had primarily been clarifying the two (2) alternative routes the Authority had looked at originally for the sewer extension, but eliminated due to the cost.

OLD BUSINESS:

Knoebels Picnic – Mrs. Gill indicated a census was taken and it appears as it will be a good employee turnout for the Knoebels Picnic. It was noted that some employees may not attend if the mask ordinance is enforced. The pavilion is reserved and if there are not enough people interested in attending, the reservations can be cancelled at no cost to the Authority. The picnic will be held on August 7, 2021.

NEW BUSINESS:

American Top Team Agreement of Dedication – Mr. Miller informed the Board that we have received all items needed to close out the American Top Team sewer main line extension; therefore, he recommended approval of the Agreement of Dedication. **Mr. Galbraith moved, seconded by Mr. Swanderski to approve the Agreement of Dedication for the American Top Team sewer extension project. 8 ayes, 0 nays, 1 absent. The motion carried.**

Identity Theft Prevention Program – Mr. McDowell presented the Identity Theft Prevention Program Compliance Model to the Board for comment. This program is intended to identify red flags that will alert our employees when new or existing accounts are opened using false information, protect against the establishment of false accounts, methods to ensure existing accounts were not opened using false information, and measures to respond to such events. It was noted there were no changes to the Identity Program Compliance Model. This Program is updated and approved on a yearly basis. **Mr. Galbraith moved, seconded by Mr. Dashner to approve the Identity Theft Prevention Program as presented for discussion and made a part of these official Minutes. 8 ayes, 0 nays, 1 absent. The motion carried.**

COMMITTEE REPORTS:

Personnel & Community Relations Committee: Mr. Hoffman informed the Board that he recently had discussions with the Authority's management staff about the need for additional personnel in the maintenance department. Mr. Hoffman stated that the hiring of additional personnel needs to be considered with the 2022 budget and also suggested hiring an individual now instead of waiting until next year. He indicated the budget could be modified to include the hiring of an additional laborer now. Mr. Houser recommended making sure the Authority has an adequate number of vehicles and equipment for the additional employees.

Mr. Barton stated additional maintenance department personnel are needed to help with completing routine monthly maintenance as well as staying on track with the video inspection/cleaning of the Authority's sewer mainline. Mr. Barton indicated about 25,000 feet per month of sewer mainline needs video inspected/cleaned to align with the Authority's five-year maintenance plan. Due to ongoing projects, the maintenance staff were only able to video inspect/clean approximately 8,000 feet of mainline last month.

Mr. Galbraith asked if this was a state requirement and Mr. Miller stated no, our Authority is proactive with locating/making repairs before they become a problem. Mr. Miller explained to the Board the importance of keeping the Authority's system in good shape and the financial impact that infiltration and inflow has on the Bellefonte Borough bill for the treatment of our sewage flows.

Mr. Galbraith indicated he spoke with a local municipal authority who confirmed they only perform this type of work when an issue arises. Mr. Miller stated that many of those smaller systems contact our Authority for assistance when needing video/cleaning work due to staffing issues. Mr. Miller continued by stating he is aware of only one local municipal authority that is proactive with maintaining their system and that Authority has a similar size system, but more personnel than our Authority.

Mr. Galbraith asked if the need for additional personnel would be eliminated if our Authority would stop assisting other entities and focus on our own system. Mr. Miller stated that our Authority does not spend much time assisting other systems and we would still need additional personnel regardless of whether or not we continue work for outside entities. He also wanted to make the current Board aware that at the time the original Vector Truck was purchased, several past Board members insisted upon the truck being rented so the Authority could generate extra income.

Discussion was held about the average age of our Authority's licensed operators and the issues surrounding the water/wastewater industry with the need for younger, experienced, licensed operators. This has been quite a challenge especially with the everchanging regulations.

Mr. Hoffman then discussed the pay range for a Maintenance Assistant/Laborer and stated that our Authority may want to make the pay more competitive since even some local convenience stores have increased their starting wages to an amount similar to ours which also includes benefits.

Mr. Barton stated that this Authority requires a lot from its new hires as far as reading/learning outside of scheduled work hours when becoming a licensed operator and this type of work may not be attractive for job seekers. Especially when local convenience stores are paying the same wages, but those jobs come with less responsibility. Mr. Galbraith stated then maybe we should consider just hiring laborers and not requiring a water/wastewater license. Mr. Barton stated that he believes anyone coming to work for this Authority in the maintenance department should be required to obtain their water/wastewater license. This holds the employees more accountable for their actions and alleviates scheduling issues with only being able to have certain employees complete certain jobs. Mr. Miller stated he agrees with Mr. Barton, cross-training is the best way to conduct business. Mr. Miller also stated that scheduling becomes difficult when there is limited staff and that staff with longevity is wanting to schedule their paid time off.

Mr. Hoffman stated that all of these things should be considered when hiring additional maintenance department personnel. Mr. McDowell indicated further discussion would be forthcoming.

EXECUTIVE SESSION – Mr. McDowell recessed the Board for an Executive Session at 8:09 p.m. to discuss Real Estate. The meeting reconvened at 8:47 p.m.

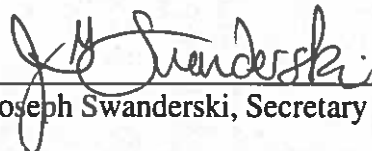
Facilities Committee: Mr. Book was absent from the meeting. Mr. Dashner and Mr. Houser had nothing more to report.

Financial Committee: Mr. Heny had nothing to report.

ADJOURNMENT:

Mr. Hoffman moved, seconded by Mr. Swanderski to adjourn the meeting at 8:47 p.m. 8 ayes, 0 nays, 1 absent. **The motion carried.**

Respectfully submitted,



Joseph Swanderski, Secretary



Tasha L. Dutton, Recording Secretary

CC: Benner Township _____
Spring Township _____
Walker Township _____

Identity Theft Prevention Program

For

SPRING – BENNER – WALKER JOINT AUTHORITY

170 Irish Hollow Road

Bellefonte, PA 16823

April 12, 2021

Spring – Benner – Walker Joint Authority Identity Theft Prevention Program

This Program is intended to identify red flags that will alert our employees when new or existing accounts are opened using false information, protect against the establishment of false accounts, methods to ensure existing accounts were not opened using false information, and measures to respond to such events.

Contact Information:

The Senior Management Person responsible for this program is:

Name: N. Warren Miller

Title: Executive Director

Phone number: 814-355-4778

The Governing Board Members of the Utility are:

1. Dennis McDowell, Chairman

7. Brian Book

2. Joseph Galbraith, Vice Chairman

8. Toby Dashner

3. Gregg Heny, Treasurer

9. Willis Houser, Jr.

4. Chris McMurtrie, Assistant Treasurer

5. Joseph Swanderski, Secretary

6. Dan Hoffman, Assistant Secretary

Risk Assessment

The Spring Benner Walker Joint Authority has conducted an internal risk assessment to evaluate how at risk the current procedures are at allowing customers to create a fraudulent account and evaluate if current (existing) accounts are being manipulated. This risk assessment evaluated how new accounts were opened and the methods used to access the account information. Using this information the utility was able to identify red flags that were appropriate to prevent identity theft.

- ✓New accounts opened In Person
 - ✓Account information accessed In Person
-

Detection (Red Flags)

The Spring Benner Walker Joint Authority adopts the following red flags to detect potential fraud. These are not intended to be all-inclusive and other suspicious activity may be investigated as necessary.

- ✓Fraud or active duty alerts included with consumer reports
- ✓Notice of credit freeze provided by consumer reporting agency
- ✓Notice of address discrepancy provided by consumer reporting agency
- ✓Inconsistent activity patterns indicated by consumer report such as:
 - Recent and significant increase in volume of inquiries
 - Unusual number of recent credit applications
 - A material change in use of credit
 - Accounts closed for cause or abuse
- ✓Identification documents appear to be altered
- ✓Photo and physical description do not match appearance of applicant
- ✓Other information is inconsistent with information provided by applicant
- ✓Other information provided by applicant is inconsistent with information on file.
- ✓Application appears altered or destroyed and reassembled
- ✓Personal information provided by applicant does not match other sources of information (e.g. credit reports, SS# not issued or listed as deceased)
- ✓Information provided is associated with known fraudulent activity (e.g. address or phone number provided is same as that of a fraudulent application)
- ✓Information commonly associated with fraudulent activity is provided by applicant (e.g. address that is a mail drop or prison, non-working phone number or associated with answering service/pager)
- ✓ SS#, address, or telephone # is the same as that of other customer at utility
- ✓Customer fails to provide all information requested
- ✓Personal information provided is inconsistent with information on file for a customer
- ✓Applicant cannot provide information requested beyond what could commonly be found in a purse or wallet
- ✓Identity theft is reported or discovered

Response

Any employee that may suspect fraud or detect a red flag will implement the following response as applicable. All detections or suspicious red flags shall be reported to the senior management official.

- ✓Ask applicant for additional documentation
- ✓Notify internal manager: Any utility employee who becomes aware of a suspected or actual fraudulent use of a customer or potential customers identity must notify the Executive Director.
- ✓Notify law enforcement: The utility will notify the PA State Police at Rockview of any attempted or actual identity theft.
- ✓Do not open the account
- ✓Close the account

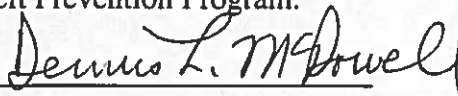
Personal Information Security Procedures

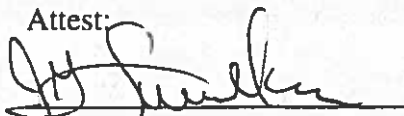
The Spring Benner Walker Joint Authority adopts the following security procedures:

1. Files containing personally identifiable information are kept in a locked file cabinet except when an employee is working on the file
2. Employees will not leave sensitive papers out on their desks when they are away from their work stations.
3. No visitor will be given any entry codes or allowed unescorted access to the office.
4. Passwords will not be shared or posted near work stations.

Identity Theft Prevention Program Review and Approval

This plan has been reviewed and adopted by the Utility Board of Directors by motion during the April 12, 2021 meeting. Appropriate employees have been trained on the contents and procedures of this Identity Theft Prevention Program.


Board Chairman

Attest:

Secretary

Name of Senior Management Staff Person: N. Warren Miller

Position: Executive Director

Date: 04/12/2021

Signature: 

A report will be prepared annually and submitted to the above named senior management or governing body to include matter related to the program, the effectiveness of the policies and procedures, the oversight and effectiveness of any third party billing and account establishment entities, a summary of any identify theft incidents and the response to the incident, and recommendations for substantial changes to the program, if any.

Appendix A
Other Security Procedures

The following suggestions are not part of or required by the Federal Trade Commission's "Identity Theft Red Flags Rule". The following is a list of other security procedures a utility should consider to protect consumer information and to prevent unauthorized access. Implementation of selected actions below according to the unique circumstances of utilities is a good management practice to protect personal consumer data.

1. Paper documents, files, and electronic media containing secure information will be stored in locked file cabinets. File cabinets will be stored in a locked room.
2. Only specially identified employees with a legitimate need will have keys to the room and cabinet.
3. Files containing personally identifiable information are kept in locked file cabinets except when an employee is working on the file.
4. Employees will not leave sensitive papers out on their desks when they are away from their workstations.
5. Employees store files when leaving their work areas
6. Employees log off their computers when leaving their work areas
7. Employees lock file cabinets when leaving their work areas
8. Employees lock file room doors when leaving their work areas
9. Access to offsite storage facilities is limited to employees with a legitimate business need.
10. Any sensitive information shipped using outside carriers or contractors will be encrypted
11. Any sensitive information shipped will be shipped using a shipping service that allows tracking of the delivery of this information.
12. Visitors who must enter areas where sensitive files are kept must be escorted by an employee of the utility.
13. No visitor will be given any entry codes or allowed unescorted access to the office.
14. Access to sensitive information will be controlled using "strong" passwords. Employees will choose passwords with a mix of letters, numbers, and characters. User names and passwords will be different. Passwords will be changed at least monthly.
15. Passwords will not be shared or posted near workstations.

16. Password-activated screen savers will be used to lock employee computers after a period of inactivity.
17. When installing new software, immediately change vendor-supplied default passwords to a more secure strong password.
18. Sensitive consumer data will not be stored on any computer with an Internet connection
19. Sensitive information that is sent to third parties over public networks will be encrypted
20. Sensitive information that is stored on computer network or portable storage devices used by your employees will be encrypted.
21. Email transmissions within your business will be encrypted if they contain personally identifying information.
22. Anti-virus and anti-spyware programs will be run on individual computers and on servers daily.
23. When sensitive data is received or transmitted, secure connections will be used
24. Computer passwords will be required.
25. User names and passwords will be different.
26. Passwords will be changed at least monthly.
27. Passwords will not be shared or posted near workstations.
28. Password-activated screen savers will be used to lock employee computers after a period of inactivity.
29. When installing new software, vendor-supplied default passwords are changed.
30. The use of laptops is restricted to those employees who need them to perform their jobs.
31. Laptops are stored in a secure place.
32. Laptop users will not store sensitive information on their laptops.
33. Laptops which contain sensitive data will be encrypted
34. Employees never leave a laptop visible in a car, at a hotel luggage stand, or packed in checked luggage.
35. If a laptop must be left in a vehicle, it is locked.
36. The computer network will have a firewall where your network connects to the Internet.

37. Any wireless network in use is secured.
38. Maintain central log files of security-related information to monitor activity on your network.
39. Monitor incoming traffic for signs of a data breach.
40. Monitor outgoing traffic for signs of a data breach.
41. Implement a breach response plan.
42. Check references or do background checks before hiring employees who will have access to sensitive data.
43. Access to customer's personal identify information is limited to employees with a "need to know."
44. Procedures exist for making sure that workers who leave your employ or transfer to another part of the company no longer have access to sensitive information.
45. Implement a regular schedule of employee training.
46. Employees will be alert to attempts at phone phishing.
47. Employees are required to notify the general manager immediately if there is a potential security breach, such as a lost or stolen laptop.
48. Employees who violate security policy are subjected to discipline, up to, and including, dismissal.
49. Service providers notify you of any security incidents they experience, even if the incidents may not have led to an actual compromise of our data.
50. Paper records will be shredded before being placed into the trash.
51. Paper shredders will be available at the office, near the photocopier.
52. Any data storage media will be disposed of by shredding, punching holes in, or incineration.