## CSO – CUSTOMER REQUESTED ACCESS TO ACCOUNT INFORMATION

## STANDARD OPERATING PROCEDURE

**Purpose:** To define the process for credentialing customers, on the phone or over email, when they are attempting to: access sensitive account information, request certain service order types; or when they are attempting to discontinue service.

**Scope:** This SOP applies to all DES, CSO Staff. It should be applied to all customer interactions when service requests are originated, or sensitive account information is discussed.

**Operating Procedure:** To protect the integrity of our customer accounts, customers are to be asked to provide us with verification information before the sensitive components of their account can be discussed or sensitive service orders requested.

**3 Step Verification:** 1) Customers must be asked to provide their name or the name of the account holder and 2) the service address associated with the account. 3) In addition, <u>one</u> of the following six credentials as recorded in our Utility Billing System must be provided by the customer, before any confidential account information can be discussed or sensitive service orders can be requested. A matrix showing all of the account activities for which the 3 Step Verification process applies, is attached on page 4 below (Sensitive Services).

- 1) Customer account number,
- 2) Social security number (last four digits),
- 3) Driver's license number,
- 4) Amount of last bill or processed payment,
- 5) Month and year that the account was established; and
- 6) Federal tax ID for commercial accounts.

**Conversion Accounts:** The DES Customer Service Office replaced its utility billing system in 2019. The replacement system was fully operational on November 18, 2019. These security protocols apply, and all three steps of the 3 Step Verification process must be followed for all accounts established after November 18, 2019.

During the data migration process, from our legacy system (AS400) to our new Utility Billing System (CU), all social security numbers (SSN's) were removed from our utility accounts as a Department of Technology Services required data protection measure (Conversion Accounts). As a result, many of our customers with Conversion Accounts, who used the last 4 digits of their SSN's for account verification purposes, would not be able to request Sensitive Services. For this reason, we are providing our Conversion Accounts with some leniency from our 3 Step Verification process, until verification credentials are again built up in the CU Billing System.

For all Conversion Accounts that no longer have the credentials needed to request Sensitive Services customers may now, as a temporary substitution to the 3 Step Verification Process, provide us with one of the following 4 types of credentials before any Sensitive Services can be requested.

- 1) Service location owner's name,
- 2) Amount of last bill or processed payment,
- 3) A scanned or faxed copy of the customer's driver's license; or
- 4) Another form of identification approved by the Contact Center Team Lead, or above.

Customer Service Representatives who are interacting with customers who have Conversion Accounts without one of the six credential types described in the 3 Step Verification process above must request this information and enter it into CU for future use.

**Account Access:** Only account holders and other persons authorized by the account holder can be provided with private account information. The account holder can authorize other people to access their account during the account setup process, or upon request. New account holders should be asked if they would like to name somebody else as a responsible party (such as a spouse or housemate) or authorize someone else (such as a parent or a sibling) to request or modify services on an account.

**Property Owners** may request information about account payment activity, current balances and arrearages, if they are properly credentialed. Ownership can be verified by asking simple screening questions, such as: the name of a tenant or the year and month that the property was acquired. Verified property owners may pay and close delinquent tenant accounts. If a staff person is unable to reasonably credential a supposed property owner, they should consult with CSO leadership.

**Property Management Companies** must be duly authorized to open, close, access or request services on an account. To be duly authorized, a representative from the property management company must complete and return the Property Management Form, available online, to CSO. Completed forms may be submitted to us by email (*to: DESContactCenter@Arlingtonva.us*), via fax (*to: 703.228.7893*) or by mail (*to: DES, Customer Service Office, 2020 N 14<sup>th</sup> Street, Suite 500, Arlington VA, 22201*). Completed forms should be recorded under the pertinent account in our utility billing system. Representatives from property management companies must be able to verify the account number and the service address any time they contact us to discuss an account. If they are unable to recite the account number and service address, they should be asked to provide a written request, on the Property Management Company's letterhead, that has been duly executed by a company official. In all cases that letterhead is required, a fax stamp may be used as a substitution to letterhead.

**Other duly authorized agents:** Agents, executors, administrators, legal guardians and other duly authorized fiduciaries must be able to provide us with proof of their status. Authorizing documents should be sent to us by email, fax or postal service. Again, authorization documents are to be recorded with account records in our utility billing system.

Executors may alternatively provide: 1) a death certificate, 2) the service address, and 3) another utility bill with the executor's name as the payor for a utility that serves the probated property; or a copy of the executor's driver's license.

**Real Estate Sales:** During the conveyance of property, title companies may request an outstanding balance. These requests should be made by email, and the email should be sent from an official title

company email address. Alternatively, title company balance requests can be made in writing, on the Title Companies letterhead and that has been duly executed by a company official.

**Charitable assistance:** If a third-party charity or the County's Department of Human Services pledges to assist a customer to pay their utility bill, they must be able to provide the customer's name, address and account number before you can share the balance due. A written commitment should be sent from the third-party payor identifying the amount they are seeking to pay for the delinquent customer. This document should be recorded on the subject account.

**Exception requests** should be escalated to the Contact Center Lead, or above.

DES, Customer Service Manager

Service	Security Protocols Apply	Security Protocols DO NOT Apply*	Comments
Water related services	~		Privacy Issues
(Billing questions, new accounts, closing accounts, name changes, any other water related services)	~		
Mulch Requests	✓		Fees Involved
Metal Collection Requests		✓	Fees Involved
E-Waste Collection Requests		✓	Fees Involved
Cart Services (including replacement)		✓	
Brush Requests		✓	
Sweeper Requests		✓	
Litter Requests		✓	
Missed Trash Services Request		✓	

NOTE: \* Where the security protocols do not apply, ANYONE CAN MAKE A REQUEST i.e.; Spouse, Partner, Child, Siblings, Roommates, POA's, etc.