



Health & Safety Alert #10-03-02

Automated Teller Machines (ATMs)

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Situation - Theft and fraud of consumer funds through unauthorized access to consumer ATM accounts is a concern that warrants heightened oversight. Consumers' bank accounts can be accessed with debit cards and credit cards that allow cash advances. The primary person involved (PPI) may steal the ATM card of the consumer or may even apply for a separate card by assuming the identity of the consumer.

Alert - The Department recommends tight fiscal accountability and measures be implemented to protect each individual's personal funds. The ATM card is viewed by a PPI as a signed blank check. With this in mind, an ATM card should be accounted for and protected. There should also be consideration of the security of the individual's personal identification number (PIN) access code. Controls that can be established include but are not limited to:

- Locking the ATM card away in a safe when not in use.
- Securing the personal identification number (pin) so that a very limited number of staff that work directly with the consumer have access to it.
- Maintain a sign-out/in sheet for the ATM card so a staff member becomes responsible for it when it is removed from the facility.
- Have the staff member and consumer sign the ATM receipt acknowledging the cash withdrawal of funds.
- Establish a system to ensure that purchases made with ATM funds are supported by receipts.
- Perform a monthly reconciliation of the account to which the ATM card is attached, by someone other than the staff member that takes care of the consumer.

For licensed facilities, ATM transactions fall under the same requirements as checking, savings, or petty cash account transactions established in O.A.C. 5123:2-3-14:

(K) ALL PERSONAL FUNDS EXPENDED BY THE LICENSEE ON BEHALF OF AN INDIVIDUAL SHALL BE ACCOMPANIED BY A RECEIPT FOR THE EXPENDITURE. THE RECEIPT SHALL IDENTIFY THE ITEM(S) PROCURED, THE DATE, AND THE AMOUNT OF THE EXPENDITURE. THE LICENSEE SHALL OBTAIN OTHER PROOF OF PURCHASE IF A RECEIPT IS UNAVAILABLE.

(L) WHEN AN INDIVIDUAL EXPENDS PERSONAL FUNDS ON HIS/HER OWN BEHALF OR WHEN PERSONAL FUNDS ARE EXPENDED FOR THE INDIVIDUAL BY A PARENT OR CUSTODIAN IF THE INDIVIDUAL IS A MINOR OR GUARDIAN, AS APPLICABLE, A RECEIPT IS REQUIRED FOR A SINGLE EXPENDITURE OF FIFTY DOLLARS OR MORE UNLESS OTHERWISE SPECIFIED IN THE INDIVIDUAL'S PLAN. WHEN A RECEIPT IS UNAVAILABLE, THE LICENSEE SHALL OBTAIN OTHER PROOF OF PURCHASE.

Indications that the individual may be subject to this type of theft or fraud may be unexplained ATM withdrawals, a pattern of ATM withdrawals at the maximum allowed, the individual's mailing address being changed, and the issuance of replacement cards with a new PIN.

For questions or comments regarding the above Alert, please contact the MUI/Registry Unit at (614) 995-3810.

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