

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Child and Family Services Agency



Administrative Issuance: CFSA-18-3

TO: CFSA and Contracted Private Agency Staff
FROM: Heather D. Stowe, Ph.D.
Principal Deputy Director
DATE: April 20, 2018
RE: Protecting Children and Youth in Foster Care from Identity Theft

To protect children and youth in foster care from identity theft, federal and local laws mandate that state child welfare agencies take certain preventive actions. Each youth in foster care, age 14 and older, must receive, without cost, a copy of their consumer credit report from each of the three credit reporting agencies (TransUnion, Equifax, and Experian) annually until he or she leaves foster care to determine whether their credit has been compromised. All children and youth, regardless of their age, will receive a copy of their consumer credit report from each of the three credit reporting agencies prior to their exit from foster care. Each child and youth will also receive assistance to interpret the credit report and resolve inaccuracies when needed.

This administrative issuance provides guidelines for ensuring that CFSA complies with District and federal law and regulations for protecting children and youth in foster care from identity theft and the process for obtaining credit reports for children and youth in care.

Questions regarding this issuance should be directed to the Office of Planning, Policy, and Program Support ("OPPPS") at (202) 724-7100 or cfsa.creditreport@dc.gov.

General Considerations

Because all credit reports contain confidential and private information, any transmission of confidential and private information must be through secured means (e.g., to email a copy of a credit report, the email must be encrypted).

CFSA and private agency social workers shall inform older youth to keep key personal identifiers secure, including:

- a. Name, address, telephone number, and birth date
- b. Mother's maiden name
- c. Serial numbers associated with the following personal information:
 - i. Social Security
 - ii. Medicaid card
 - iii. Passport or visa
 - iv. Driver's license or non-driver's ID
 - v. Bank account
 - vi. Credit or debit cards



2. CFSA and private agency social workers shall minimize sharing of personal information of the children in foster care to limit opportunities for identity theft. Precautions include, but are not limited to, the following:
 - a. Do not include the Social Security number on the Ward letter
 - b. Paper records with personally identifying information must be maintained in locked and secure storage
 - c. Transmit personally identifying information through secure methods such as encrypted email, secure fax, or mail
3. If any youth in foster care informs his or her social worker that identity theft may have occurred, then the social worker shall contact the assigned assistant attorney general (“AAG”) and notify the guardian ad litem (“GAL”).

Process for Requesting Credit Reports for Youth under the Age of 18

1. The designated credit report coordinator shall have a credit report requested from all three credit agencies annually for all youth in foster care who have attained 14 years of age and older, until they are discharged from foster care.
2. A social worker who has been informed of possible identity theft of a youth in foster care can request the credit reports for that youth at any time.
3. Any children, irrespective of age, who are preparing to exit foster care to permanency, shall receive a credit report from each of the three credit reporting agencies within 90 days prior to finalizing permanency. A request for the credit reports shall be made by the social worker to the credit report coordinator. A child is considered to be “preparing for permanency” if he or she meets any of the following criteria:
 - a. A petition for adoption has been filed for the child with the Family Court of the District of Columbia Superior Court
 - b. A motion for guardianship has been filed for the child with the Family Court of the District of Columbia Superior Court
 - c. CFSA anticipates that the jurisdiction of the Family Court will be terminated
4. Social workers requesting credit reports for youth in foster care shall provide the following:
 - a. Child’s name
 - a. Child’s current address
 - b. Social Security number
5. If a credit-reporting agency requests verification that a youth is in foster care, to prove that a youth is in foster care, the social worker shall provide the following information to the credit report coordinator:
 - a. Copy of the Family Court order indicating that CFSA is currently the legal guardian or custodian of the child or youth
 - b. Copy of the petition, motion, or other Family Court documentation relevant to the child’s exit from foster care
6. Once documentation has been submitted by email (within five business days of receipt of documentation) the credit report coordinator shall run reports from all three credit reporting agencies and provide a copy of the results to the social worker via encrypted email or interoffice mail.

Process for Requesting Credit Reports for Youth Aged 18 Years and Older

1. CFSA defines youth in care as “children” and therefore is responsible for requesting credit reports for youth in foster care 18 years of age and older. Because youth in foster care 18 and older have reached the age of legal majority, the credit report coordinator shall coordinate with the assigned worker to assist the youth in obtaining the three credit reports annually and document these efforts for federal compliance purposes.
2. If a youth 18 years of age or older objects to obtaining a credit report, then the social worker shall document in FACES efforts to inform the youth of the importance of doing so and the youth’s stated reason for refusing to obtain the credit report.

Responsibilities of CFSA Staff Following Receipt of a Credit Report

1. The credit report coordinator shall provide the social worker with a copy of credit reports from all three credit agencies via encrypted email or interoffice mail.
2. The ongoing social worker shall review and discuss the credit reports with the youth, the birth parents, and/or the resource provider to identify any irregularities and determine whether identity theft has occurred. In addition, the social worker shall ask for any information that will help to determine the circumstances surrounding the irregularity or possible identity theft.
3. If identity theft has occurred, then the social worker shall immediately alert the AAG and GAL, providing them with a copy of the credit report(s) within three business days.
4. The Office of the General Counsel (“OGC”) may direct the social worker to forward all relevant information and documentation within 10 business days to the District’s Metropolitan Police Department for criminal investigation.
5. The credit report coordinator shall contact, or refer the youth and his or her birth parents or resource parents to the credit reporting agencies within two business days of the review with the OGC to initiate resolution of the youth’s credit record in accordance with the procedures prescribed by each agency.
6. Within 30 calendar days of submission to the credit agencies of information to correct the credit record, the credit report coordinator shall request another credit report from all three credit reporting agencies for the youth, and shall continue to do so every 30 days until confirmation is received that the record has been cleared. A copy of the reports shall be provided to the social worker who shall ensure a copy is sent to the child’s GAL and the AAG within 10 business days of receipt.