

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Child and Family Services Agency



Business Process: Protecting Children and Youth in Foster Care from Identity Theft

I. Policy

It is the policy of CFSA to protect children and youth from identity theft and have a designee responsible for requesting credit reports from Equifax, Experian, and TransUnion annually for children and youth 14 years of age and older until they leave foster care. This is to ensure that any credit inaccuracies have been resolved prior to exiting care. In addition, within 90 days prior to finalizing permanency and exit from foster care, all children and youth regardless of their age, shall receive a copy of their consumer credit report from each of the three credit reporting agencies without cost. Each child and youth shall also receive assistance to interpret the credit report and resolve inaccuracies when needed.

II. Procedures

A. Responsibilities for the Office of Planning, Policy and Program Support (OPPPS) Designee

1. The OPPPS designee shall be responsible for receiving individual requests for credit reports from social workers and program area points of contact (POC) assigned to the Permanency Administration, Office of Youth Empowerment and the private provider agencies for children and youth as they exit foster care for permanency. POCs are selected and identified by the Deputy Director of Program Operations.
2. Within five business days after notification from the respective POC, the OPPPS designee will pull the child or youth's credit reports from Equifax, Experian, and TransUnion.
3. Once a year, the OPPPS designee aggregates a list of children and youth in care who are ages 14 through 17 to create batch requests for each credit bureau.
4. The OPPPS designee submits the batch request to Equifax, Experian, and TransUnion.
5. Once the results of the request are received from each of the credit bureaus, the OPPPS designee reviews each credit report and identifies outstanding debts or credit problems on the reports within 10 business days.
6. For those credit reports that do not have any discrepancies, the OPPPS designee sends an email to each POC assigned to the Permanency Administration, Office of Youth Empowerment, and the private agencies informing them that there were no discrepancies as a result of the credit pull. Within five business days of receiving the results, the POC then ensures that a contact note is documented in FACES that there were no reports of credit discrepancies found.
7. For those credit reports that have discrepancies, the OPPPS designee sends an encrypted email, with a copy of the credit report, to each POC assigned to the Permanency Administration, Office of Youth Empowerment, and the private agencies within five business days of receiving the results. Then the POC notifies the social worker of any or no outstanding credit debt discrepancies and the social worker notifies the youth of the findings and files a copy of credit reports in the youth's case file.
8. The social worker works with the child or youth to complete an identity theft form available at <https://identitytheft.gov> to report the fraud. The social worker provides confirmation of the report to the OPPPS designee.

9. The OPPPS designee gathers the disposition order and birth certificate with assistance from the social worker to work with the credit bureaus for resolution.
10. Within five business days of receipt of the disposition order and the birth certificate needed, the OPPPS designee submits via fax or mail the required information to the following credit reporting agencies listed below in Section C2b.
11. Within 90 calendar days of submission, the OPPPS designee requests another credit report from all three credit reporting agencies for the child or youth to determine if the identified discrepancies from the previous credit report have been corrected. The OPPPS designee submits follow up requests every 90 days until confirmation is received that the record has been cleared. If there is no response from the credit agencies, then the OPPPS designee will determine whether legal intervention is necessary. If so, the OPPPS designee will consult with OGC regarding next steps.
12. Within five business days the OPPPS designee confirms that the debt has been cleared and informs the POC who notifies the social worker who notifies the child or youth.
13. Once a year the OPPPS designee aggregates a list of youth in care 18-20 years of age and notifies the designated program area POC that such youth will need assistance from their assigned social workers to pull their credit reports (see Section C2 below for contact information).

B. The Responsibilities of the POC

1. The POC shall disseminate within 72 hours the information from the OPPPS designee to the social worker assigned to the impacted child or youth. The POC will send an email to request that the social worker speak with the child or youth directly to determine if they are aware of outstanding debt or credit problems.
2. If a credit discrepancy is in question and the child or youth is unaware of any outstanding debt or credit problems, the POC sends an email with the youth's social security number and date of birth to the OPPPS designee within 72 hours requesting that a credit report be pulled.
3. The OPPPS designee reports any outstanding credit or debt issues that the child or youth may have to the POC within five business days. The POC notifies the social worker of outstanding credit debt or issues. The social worker works with the child or youth to complete an identity theft form available at <https://identitytheft.gov> to report the fraud. The social worker provides the reference number located on the report to the OPPPS designee within five business days.

C. Responsibilities of The Social Worker

1. For children or youth who are younger than 18 years of age, the social worker shall perform the following:
 - a. If the youth reports a credit discrepancy to their social worker, then the social worker submits a request to the OPPPS designee requesting a credit report be pulled. The OPPPS designee works towards a discrepancy resolution.
 - b. Once the results of the request are received, the social worker shall ensure that a contact note is entered into FACES within 72 hours. When the discrepancy is resolved, a copy of the clean credit report is placed within the youth's case file by the social worker.

2. For youth in foster care who are 18 years old or older, the social worker performs the following:
 - a. Documents in FACES efforts made to inform the youth of the importance of obtaining a credit report. This step should be completed within 72 hours especially if a youth objects to obtaining a credit report. The FACES note should indicate the youth's stated reason for refusing to obtain the credit report.
 - b. Assist the youth with pulling their credit report and where discrepancies are identified, the social worker assists the youth with resolving the issue by navigating the annualcreditreport.com website or contacting the credit bureaus directly by using the contact information below:

Web Sites

Equifax - www.equifax.com/CreditReportAssistance

Experian - www.experian.com/fraud

TransUnion - www.transunion.com/fraud

Mailing Addresses

Equifax
PO Box 105139
Atlanta, GA 30348
Phone: (886) 349-5191
Fax: (770) 740-4331

Experian
My Customer Experience
PO Box 9701
Allen, Texas 75013
Phone: 866-200-6020

TransUnion Consumer
Solutions
P.O. Box 2000
Chester, PA 19016-2000
Phone (833) 395-6941
Mon–Fri 8:00AM - 1:00PM ET