



<b>POLICY TITLE:</b>	<b>Protecting Children and Youth in Foster Care from Identity Theft</b>		
 	<b>CHILD AND FAMILY SERVICES AGENCY</b>		
<b>Approved By:</b>	<b>Date Approved:</b>	<b>Original Effective Date:</b>	<b>Last Revision:</b>
Tanya T. Trice	September 16, 2023	April 20, 2018	August 2, 2023

<b>I. AUTHORITY</b>	D.C.Code § <a href="#">4-1303.03 (16)(A i-iv-D)</a> , Duties and Power of the Director, § <a href="#">4-1306.06</a> (Confidentiality of Records and Information), and Child and Family Services Improvement and Innovation Act ( <a href="#">Public Law 112-34, § 106 (b)</a> ).
<b>II. APPLICABILITY</b>	This policy shall apply to all Child and Family Services Agency (“CFSA”) staff and contracted providers. The provisions of this policy are based on operational needs to protect children and youth in foster care from identity theft.
<b>III. RATIONALE</b>	The purpose of this policy is to ensure guidelines are in place 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.
<b>IV. POLICY</b>	<p>It is CFSA’s policy that credit reports from Equifax, Experian, and TransUnion shall be requested annually for children and or 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<sup>1</sup> 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.</p> <p>This policy 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.</p> <p>Questions regarding this policy should be directed to the Office of Planning, Policy, and Program Support (OPPPS) at (202) 724-7100 or <a href="mailto:cfsa.creditreport@dc.gov">cfsa.creditreport@dc.gov</a>.</p>

<sup>1</sup> A child preparing for permanency shall meet the following criteria: a petition for adoption has been filed for the child with the Family Court of the District of Columbia Superior Court; a motion for guardianship has been filed for the child with the Family Court of the District of Columbia Superior Court; CFSA anticipates that the jurisdiction of the Family Court will be terminated.

<p><b>V. CONTENTS</b></p>	<p><b>A. General Guidelines</b>  <b>B. Annual Pulling of Credit Reports for Youth Ages 14 and Older</b>  <b>C. Requesting Credit Reports for Youth Younger Than 18 years of Age</b>  <b>D. Requesting Credit Reports for Youth 18 Years of Age and Older</b></p>
<p><b>VI. SECTIONS</b></p>	<p><b>Section A: General Guidelines</b></p> <ol style="list-style-type: none"> <li>1. All credit reports contain confidential and private information and any transmission of confidential and private information shall be completely secured. All emailed copies of a credit report shall be encrypted.</li> <li>2. CFSA and private agency social workers shall inform older youth to keep key personal identifiers secure. Personal identifiers shall include, but are not limited to, the following: <ol style="list-style-type: none"> <li>a. Name, address, telephone number, and birth date</li> <li>b. Mother’s maiden name</li> <li>c. Serial numbers associated with the following personal information: <ol style="list-style-type: none"> <li>i. Social Security</li> <li>ii. Medicaid card</li> <li>iii. Passport or visa</li> <li>iv. Driver’s license or another identification card</li> <li>v. Bank account</li> <li>vi. Credit or debit cards</li> <li>vii. User names and passwords</li> </ol> </li> </ol> </li> <li>3. CFSA and private agency social workers shall minimize sharing personal information of children and youth in foster care to limit opportunities for identity theft. Precautions include, but are not limited to, the following: <ol style="list-style-type: none"> <li>a. The Ward letter or Disposition Report shall not include any Social Security numbers.</li> <li>b. Paper records with personally identifying information shall be maintained in a locked and secure storage location (e.g., file cabinets or desk drawer).</li> <li>c. Secure methods such as encrypted email, secure fax, or mail shall be used to transmit personally identifying information.</li> </ol> </li> </ol>
	<p><b>Section B: Annual Pulling of Credit Reports for Youth ages 14 or older</b></p> <ol style="list-style-type: none"> <li>1. Once a year, the OPPPS designee shall aggregate a list of children and youth in care who are ages 14 through 17 to create batch requests for each credit bureau (Equifax, Experian, and TransUnion).</li> </ol>

	<p>2. Once a year the OPPPS designee shall aggregate a list of youth in care 18-20 years of age and notify the designated program area Point of Contact (POC)<sup>2</sup> that these youth will need assistance from the client's assigned social worker to pull their credit reports.</p>
	<p><b>Section C: Requesting Credit Reports for Youth Younger Than 18 years of Age</b></p> <p>Requesting annual credit report checks can protect youth and children's credit history from errors and help to spot signs of identity theft.</p> <ol style="list-style-type: none"> <li>1. If the youth in care reports any errors or credit discrepancies, the social worker shall submit a request to the OPPPS designee.</li> <li>2. As children and youth exit foster care to permanency, the social worker shall submit a request to the OPPPS designee.</li> </ol>
	<p><b>Section D: Requesting Credit Reports for Youth 18 years of Age and Older</b></p> <ol style="list-style-type: none"> <li>1. Youth who are 18 years of age and older and have reached the age of legal majority, the OPPPS designee will notify the designated program area POC. Within five business days of pulling the aggregate list of youth who are 18-20 years of age, the OPPPS designee will notify the program's POC that the youth may need assistance in requesting their credit report annually.</li> <li>2. All credit report requests to the credit bureau for youth shall be submitted by the youth with assistance from the social worker. The social worker shall work with the youth to obtain their credit reports from all three credit reporting agencies (Equifax, Experian, and TransUnion).</li> <li>3. If there are any disputes or where identity theft is identified, the youth should follow the instructions given by <a href="http://annualcreditreport.com">annualcreditreport.com</a>.</li> </ol>

<sup>2</sup> POCs shall be selected and identified by the Deputy Director for Program Operations.