

	DIVISION OF FAMILY AND CHILDREN SERVICES CHILD WELFARE POLICY MANUAL			
	Chapter:	(13) Independent Living Program	Effective Date:	
	Policy Title:	Credit Reports for Youth in Care		
Policy Number:	13.6	Previous Policy #:	N/A	

CODES/REFERENCES

The Child and Family Services Improvement and Innovation Act (P.L.112-34)
Section 475 (5)(I) of the Social Security Act

REQUIREMENTS

*The Division of Family and Children Services (DFCS) shall ensure that each child in foster care who has reached 16 years of age receives a free copy of their consumer credit report from each of the three (3) nationwide credit report agencies¹ each year they remain in foster care until age 18 and receives assistance (including when feasible, from any court appointed advocate for the child) in interpreting and resolving any inaccuracies in the report. **NOTE:** Only one report from each credit reporting agency may be obtained in a 12 month period.*

DFCS shall ensure youth age 16 years and older in foster care shall participate annually in consumer credit education which includes information on interpreting and understanding consumer credit and credit reports.

If any of the credit reporting agencies reports that a youth has a credit history, DFCS shall ensure the youth receives assistance in interpreting the credit report and resolving any inaccuracies in the report.

DFCS shall provide youth emancipating from foster care with information on how to obtain annual free credit reports which they may do independently upon reaching age 18 years.

PROCEDURES

Within thirty (30) calendar days of a youth in foster care turning 16 years of age and 17 years of age or upon entry into foster care of a youth age 16 years or older, the Social Services Case Manager (SSCM) will:

1. Update the Written Transitional Living Plan (WTLP) to include the following two goals which must be completed within six (6) months of being included in the WTLP or prior to the next WTLP update (which is no longer than six (6) months):
 - a. The SSCM will request a credit report court order in order to obtain the three credit agencies' reports and will provide assistance with interpreting and resolving any inaccuracies in the report(s) as needed; and
 - b. The SSCM shall ensure that the youth participates in an approved consumer credit course which provides information on interpreting and understanding

¹ Equifax, TransUnion and Experian are the three nationwide credit reporting agencies.

consumer credit and credit reports. **NOTE:** A list of approved 1:1, group and online options are described in the [Practice Guidance](#). Additional options may be approved by the ILP Manager if they meet required content.

Credit Reporting Court Order

In order to request the credit reports, a Credit Reporting Court Order must be obtained. The Social Services Case Manager (SSCM) shall:

1. Send the legal request form to the Special Assistant Attorney General (SAAG) and request a Credit Reporting Court Order.
2. Once received, upload a copy of the court order in the GA Statewide Automated Child Welfare System (SHINES) in External Documentation;
3. Complete the Credit Report Request (CRR) in SHINES. **NOTE:** Once these steps are complete, an alert will be sent to the state office ILP Credit Report Specialist (ILP CRS). The ILP CRS is responsible for obtaining the youth credit reports after receipt of the (CRR) and authorizing court order.

Receipt of Credit Reports

Upon receipt of responses from all three (3) credit agencies, the ILP CRS shall:

1. Upload the responses into SHINES External Documentation using the following document type names, as applicable:
 - a. Equifax Credit Report;
 - b. Trans Union Credit Report;
 - c. Experian Credit Report.
2. Complete the Credit Report Results Summary (CRRS) in SHINES for each report.
NOTE: Once all three reports have been completed, the SSCM will receive an alert.

Within thirty (30) calendar days of receiving the alert from the ILP CRS, the SSCM shall discuss the credit results with the youth as follows:

1. If the CRRS indicates that all three (3) credit reporting agencies responded that **no credit history exists** for the youth, document that this information was shared with the youth in the Narrative of the Contact Detail in SHINES using the “Credit Report Results” purpose type.
2. If the CRRS indicates that any of the credit reporting agencies responded that the youth **does have a credit history; i.e. Credit History Found-Resolution Needed or Other:**
 - a. Download the report from SHINES and provide it to the youth;
 - b. Ensure the youth understands the content of the report(s);
 - c. In collaboration with the youth, initiate the process for resolving any inaccuracies;
 - d. Document the discussion and plan to resolve any inaccuracies in the Narrative of the Contact Detail in SHINES using the “Credit Report Results” purpose type.

NOTE: If the discussion of the credit reports occurs in conjunction with the Every Child Every Month (ECEM) contact, it may be documented in the ECEM narrative, but must clearly indicate that the above procedures were met.

Subsequent Reports

The ILP CRS will receive an alert in SHINES when subsequent credit reports are due for a youth who previously had credit reports obtained. **NOTE:** A new Credit Reporting Court Order is not needed. Upon receipt of all three (3) credit agencies' credit reports, the ILP CRS shall:

1. Upload the responses into SHINES External Documentation using the following document type names, as applicable:
 - a. Equifax Credit Report;
 - b. Trans Union Credit Report;
 - c. Experian Credit Report.
2. Complete the Credit Report Results Summary (CRRS) in SHINES for each report.
NOTE: Once all three reports have been completed, the SSCM will receive an alert.

Within thirty (30) calendar days of receiving the alert from the ILP CRS, the SSCM shall discuss the credit results with the youth as follows:

1. If the CRRS indicates that all three (3) credit reporting agencies responded that **no credit history exists** for the youth, document that this information was shared with the youth in the Narrative of the Contact Detail in SHINES using the "Credit Report Results" purpose type.
2. If the CRRS indicates that any of the credit reporting agencies responded that the youth **does have a credit history; i.e. Credit History Found-Resolution Needed or Other:**
 - a. Download the report from SHINES and provide it to the youth;
 - b. Ensure the youth understands the content of the report(s);
 - c. In collaboration with the youth, initiate the process for resolving any inaccuracies;
 - d. Document the discussion and plan to resolve any inaccuracies in the Narrative of the Contact Detail in SHINES using the "Credit Report Results" purpose type.

NOTE: If the discussion of the credit reports occurs in conjunction with the Every Child Every Month (ECEM) contact, it may be documented in the ECEM narrative, but must clearly indicate that the above procedures were met.

Assisting Youth with Resolving Inaccuracies

To help the youth resolve any inaccuracies on the credit report, the SSCM shall:

1. In collaboration with the Court Appointed Special Advocate (CASA), assist the youth in disputing the credit report findings and clearing the report by following the steps outlined in [Taking Charge: What to Do if Your Identity is Stolen](#).
2. In written correspondence with the three (3) credit reporting agencies and any businesses listed on the report, include:
 - a. An explanation that the youth is a minor and cannot legally enter into any type of contract;
 - b. A request that the account be closed and flagged as a result of identity theft;
 - c. A request for a written response stating the disputed accounts have been closed and the fraudulent debts have been discharged.

Note: If we send information to anyone outside the agency (credit bureaus) via email, we need to send the information in a password-protected and encrypted zip file.

Contact your Business Application Specialist for assistance, if necessary.

3. If necessary, request guidance from the ILP CRS;
4. Once the credit history information is resolved, update the CRRS in SHINES with the date of the resolution(s) by the credit agencies and how the issue(s) were resolved.

PRACTICE GUIDANCE

Credit Reports for Older Youth in Foster Care

The Child and Family Services Improvement and Innovation Act (Public Law (Pub. L.) 112-34) requires that all youth in foster care who are 16 and older should be assisted in obtaining a copy of the consumer credit report each year until they leave foster care. The law also includes the provision that youth shall be assisted in interpreting the credit report and resolving any discrepancies in the report.

Youth should be educated on the importance that credit history plays in many important aspects of their lives. They should be informed of the following:

1. The information contained in credit reports is used to evaluate applications for loans, cell phones, cable, utilities, credit cards, insurance, employment, purchasing a car or home, renting an apartment, etc.
2. Regular monitoring of their credit report is important to ensure information is accurate and up-to-date and to prevent identify fraud.
3. Once they turn 18 they can request their own annual free credit report at www.AnnualCreditReport.com.
4. If they have a less than favorable credit score, they can be denied many of the aforementioned services, be asked for a large deposit to cover the cost of a service or be denied employment opportunities.
5. The importance of correcting discrepancies and/or negative information on the credit report when discovered.
6. The importance of protecting and ways to protect their identifying information such as social security numbers, birth dates, etc.

Subsequent Reports

Youth credit reports must be obtained from each of the three (3) nationwide credit report agencies each year a youth remains in foster care until age 18 and the youth must receive assistance (including when feasible, from any court appointed advocate for the child) in interpreting and resolving any inaccuracies in the report. Therefore, another credit report must be obtained 12 months after the initial report is obtained if the youth has remained in foster care and has not yet obtained 18 years of age. Only one report from each credit reporting agency may be obtained in a 12 month period.

WTLP Goal Timeframes

The Written Transitional Living Plan must be updated every six months. The timeframe for individual goals however have different goal achievements dates which may go across one or more WTLP updates. The two goals for credit reporting must be completed within the six months in which they were included in the WTLP or prior to the next WTLP update (which is no longer than six months).

It is required that the credit reporting goals are added within 30 days of the youth turning 16 and 17 years or within 30 days of their entry into foster care if they are at least 16 years of

age at the time. This may require that WTLPs are completed sooner than the standard six month timeframe. The SSCM will receive an alert when youth in care are within 60 days of their 16th and 17th birthdays so that the WTLP may be updated timely with the credit reporting goals.

Youth Age 18 and Older Receiving Extended Youth Supportive Services

Although the requirement to obtain a credit report for youth ends in Georgia when the youth turns 18, the SSCM should assist youth receiving extended youth supportive services (EYSS) in obtaining their own annual free credit report online at www.AnnualCreditReport.com.

Note: [AnnualCreditReport.com](http://www.AnnualCreditReport.com) is the only authorized source for the free annual credit report that adults can obtain per the Fair Credit Reporting Act.

The [Federal Trade Commission](http://www.ftc.gov) (FTC) is the nation's consumer protection agency. The FTC's Bureau of Consumer Protection **works** to prevent fraud, deception, and unfair business practices in the marketplace including enforcing the Fair Credit Reporting Act (FCRA) with respect to the nation's consumer reporting agencies — Equifax, Experian, and TransUnion. The FCRA requires these agencies to provide consumers with free copies of their credit reports, upon request, once every 12 months. The FCRA promotes the accuracy and privacy of information in the files of the nation's consumer reporting companies. A credit report includes information on where you live, how you pay your bills, and whether you've been sued or arrested, or have filed for bankruptcy. Nationwide consumer reporting companies sell the information in your report to creditors, insurers, employers, and other businesses that use it to evaluate your applications for credit, insurance, employment, or renting a home. (FTC Brochure: Facts for Consumers @ <http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre34.shtm>)

For adults to obtain a free credit report online annually:

1. Go to www.AnnualCreditReport.com.
2. Select State and click "**Request Report**"
3. Complete the form - including Social Security number, date of birth, etc.
4. Click "**Continue**" which will navigate to a page that lists all three reporting agencies – (Equifax, Experian, TransUnion)
5. Click the check box for all three names
6. You will be led through each agency
7. The reports can be reviewed, saved and printed
8. The **FREE** credit report is only available **ONCE per year** (additional reports will cost). Try to establish a good time to do the credit reports annually – such as birthdays, etc.
9. The reports will also provide information on what to do to resolve any false or inconsistent information.

Identity Theft (also referred to as Identity Fraud)

Identity fraud occurs when someone uses your personally identifying information, like your name, Social Security number, or credit card number, without your permission, to commit fraud or other crimes. (<http://www.ftc.gov/bcp/edu/microsites/idtheft/consumers/about-identity-theft.html>)

Some examples for concern can include credit cards accounts that the youth has not opened, utility bills in the youth's name created prior to the youth residing on his/her own, car purchases if the youth does not have a vehicle, etc. Youth need to be aware of not only identity theft, but also other types of fraud that exist such as stealing debit card information. Unlawful people have been known to place card readers on ATM machines, gas pumps or use a handheld reader to obtain debit card information from consumers. The bank would assist youth in resolving any debit card issues.

Foster youth are at great risk of identity fraud because while in foster care, any number of people has access to their personal information (such as social security number and birthdates). This information can be used to open accounts and acquire debt without the youth's permission or knowledge and can ultimately create serious challenges for youth as they transition to adulthood.

Initial Fraud Alert

If an initial fraud alert is placed on an account, potential creditors must verify a person's identity before extending credit. To place an initial fraud alert, contact any of the three major credit reporting agencies and they are responsible for contacting the other two. Initial fraud alerts are free and remain in effect for 90 days. An extended fraud alert may also be placed on account. It is a free service and remains in effect for seven (7) years.

National Identity Theft Victim Assistance Network (NITVAN)

The National Identity Theft Victim Assistance Network is a resource that offers victim compensation and assistance throughout the United States in addition to programs to enhance service providers' ability to provide assistance to victims. NITVAN is funded by the U.S, Department of Justice.

Consumer Credit Course

Info needed...

FORMS AND TOOLS

http://www.saysoinc.org/do_you_know/how_to_get_your_credit_report/

Credit Report Request (CRR) for Youth in Foster Care

Credit Reporting Court Order Example