

## 1966 CREDIT REPORT ASSISTANCE FOR YOUTH IN CARE

Chapter: **Adolescent Services**

Section: **Supporting Transitions**



New Hampshire Division for Children, Youth and Families Policy Manual

Policy Directive: **15-42**

Approved:

Effective Date: **August 2015**

Scheduled Review Date:

Lorraine Bartlett, DCYF Director

Related Statute(s): [RSA 169-B](#), [RSA 169-C](#), [RSA 169-D](#), and [RSA 170-E](#)

Related Admin Rule(s):

Related Federal Regulation(s): [SSA 475](#)

Related Form(s): [FORM 1966](#) and [FORM 1967](#)  
Bridges' Screen(s) and Attachment(s):

A key component of DCYF practices is the principle that we prepare youth for adulthood and that we listen to youth and their voices are heard, valued, and considered. The goals of obtaining regular credit reports for every youth in care is to: ensure that the youth does not have a credit issue such as identity theft; and to assist the youth in the identification and remediation of any such issues to their credit report prior to their exit from out-of-home care.

### Purpose

This policy describes the Division for Children, Youth and Families' practices for assisting youth in interpreting credit reports and resolving any inaccuracies consistent with [Section 475\(5\)\(I\) the Social Security Act](#), Credit Reports for Youth in Foster Care.

### Definitions

"**CPSW**" means a Child Protective Service Worker employed by DCYF.

"**Credit Report**" is a record of a person's credit activities. A credit report contains identifying information, lists of accounts, credit inquiries, items of public record, and positive and negative entries.

"**Credit Reporting Agencies**" means companies that collect information from various sources and provides consumer credit information on individual consumers for a variety of uses (i.e. TransUnion, Equifax, and Experian).

"**DCYF**" or the "**Division**" means the DHHS Division for Children, Youth and Families.

"**JPO**" or "**Juvenile Probation and Parole Officer**" means an employee of DCYF who discharges the powers and duties established by RSA 170-G: 16, and supervises paroled delinquents pursuant to RSA 170-H.

"**Vendored**" means a method of purchasing services from non-contract providers. Service providers are reimbursed for the service after it has been provided.

### Policy

- I. DCYF will provide all youth ages 14 and older in out-of-home care with an annual credit report until the youth is discharged from care.

- A. DCYF will have a vendor agreement in place with all three credit reporting agencies for the purposes of obtaining credit reports for youth in out-of-home care.
  - B. The Division will provide information on each youth age 14 and older in out-of-home care to all three credit reporting agencies at least once every 12 months until the youth exits state care.
  - C. Any youth whose record contains an error will be checked with all three credit reporting agencies every three months, until error has been resolved with all credit reporting agencies.
  - D. If a youth's information is sent to the credit reporting agencies and there is no record, that youth's name will not be resubmitted for one year after initial submission.
- II. The information received from the credit reporting agencies will indicate:
- A. The youth has no record; or
  - B. The youth has a record; and
  - C. Any positive or negative credit accounts for the youth.
  - D. Any information submitted that mismatches a record in the system will be identified with an alert (e.g. a record for the same name and social security number but different address).
- III. DCYF will review the credit reports with youth, including how to interpret them, and explain the importance of credit and what is good credit and bad credit.
- IV. If a report comes back identifying an inaccuracy or problem with a youth's credit report DCYF will take appropriate action to resolve the issue including but not limited to:
- A. Contacting the credit reporting companies and initiating a:
    - 1. Initial Fraud Alert;
    - 2. Credit Freeze; or
    - 3. Extended Fraud Alert;
  - B. Contacting companies where an account was fraudulently opened or misused;
  - C. Filing a report with the Federal Trade Commission;
  - D. Filing a police report; and
  - E. Getting an "Identity Theft Report."
- V. In circumstance regarding suspected identity theft, DCYF State Office will work with administration and legal staff to take appropriate action to resolve the issues and report the crime.

### **Procedures**

- I. State Office staff will:

- A. Send youth information to the credit reporting agencies for credit checks.
  - B. Receive all information back from each credit reporting agency.
  - C. Send credit reports to the adolescent worker in the District Office that manages that youth's case.
  - D. Report any incidents of suspected identity theft to all the credit reporting agencies and convene a group at the State Office to take appropriate action.
- II. The Adolescent CPSW must:
- A. Review reports received with the CPSW/JPPPO and determine if the report is legitimate and accurate or contains an error or indicates possible identity theft.
  - B. Guide the CPSW/JPPPO through the steps needed to resolve any credit report issues.
  - C. Be available to meet with the adolescent if requested by the CPSW/JPPPO.
- III. The CPSW/JPPPO must:
- A. Maintain all court order information in Bridges for submission to the credit reporting agencies for credit report requests including:
    - 1. The name of the Judge that ordered the foster care placement;
    - 2. The date of the court order for foster care placement; and
    - 3. The effective dates of the foster care placement.
  - B. Note receipt of the report in the Bridges case contact log for the youth.
    - 1. Create one collateral for Experian, one collateral for Transunion, and one collateral for Equifax, each identified as "No Relations" as the relationship type.
    - 2. Indicate other as the "type/loc" unless a paper letter was sent and received.
    - 3. Choose the appropriate agency and the name of the child. If there is more than one child in the case who has had a credit report checked, a separate contact will need to be entered for the other child with respect to the same credit reporting agencies.
    - 4. Identify the purpose as Independent Living and concur that the contact is documenting NYTD services.
    - 5. On the Document tab indicate adult living prep and the date.
    - 6. On the Services tab indicate:
      - (a) Services are Budget and Financial Management;
      - (b) Description is info about credit and loans;

- (c) Provided by DCYF and the name of the worker who reviews the results with the youth;
  - (d) Delivery method is other and one-on-one; and
  - (e) Method comment is reviewed credit report results with youth.
7. Under comments, the first sentence must say "Credit Check."
- C. Review the credit report with the youth and teach the youth about credit.
  - D. Consult with the Adolescent worker for support, if needed.
  - E. Work with the credit reporting agencies to correct an error, if a simple error is found.
  - F. Request confirmation from all three credit reporting agencies that the error has been resolved once the error is corrected.
  - G. Document all communications and the resolution of any errors in the Bridges case contact log for the youth.
  - H. Save all communications in the youth's paper file as confirmation that the error was found and corrected.

### Practice Guidance

#### **What do I do if credit reporting agency requests proof that the youth is indeed a minor?**

- Staff can use the child's birth certificate, a court order, or any agency documentation deemed necessary and appropriate.

#### **Why is it important to check youth's credit (other than the legal requirement)?**

- Minors do not have the legal capacity to sign a contract or apply for credit. Nor will credit reporting agencies knowingly disclose credit report information for a minor, except to a parent, guardian, or custodian of the child. Therefore, if a credit report does exist for a person younger than 18 years of age, it may be due to error, fraud, or identity theft.
- Children and youth in foster care are particularly vulnerable because their personal information is often shared widely among various caretakers, service providers, and schools, etc. The misuse of the child/youth's identity and information may not be discovered until the youth exits the states care if it is not check on an annual basis.

#### **What about youth that are older than 18, but still in the states care?**

- With Title IV-E, to assist a foster youth age 18 or older in obtaining credit reports is possible. Youth aged 18 in the state's care may also request their own free credit report, without assistance, and is allowed to object to having the state check his or her credit report for them. DCYF should document any efforts made as well as any youth objections.