



State of South Carolina

Department of Social Services

Policies and Guidelines: Child Welfare Services

Title	Credit Reports for Youth and Young Adults
Document No.	620
Authority	42 USC 675(5)(l); 15 USC 1681(a)(d)
Standards	Guiding Principles and Standards (GPS) Practice Model
Application	Child Welfare Services Staff
Purpose	
To provide guidance to child welfare services staff on legally required and requested consumer credit reports for eligible youth in foster care and young adults in extension of foster care or aftercare.	
Policy Statement	
On an annual basis, until discharged from foster care, all youth between the age of 14 and 17 and young adults ages 18 to 20 will receive without cost a copy of their credit reports. The South Carolina Department of Social Services (SCDSS) assists youth and young adults who are in foster care in interpreting and resolving inaccuracies found in a report. SCDSS may engage a youth or young adult's guardian <i>ad litem</i> or attorney to assist in the interpretation and resolution of any inaccuracies. Additionally, upon request and up to age 21, SCDSS may assist youth previously in foster care at age 14, but who have exited foster due to reunification, adoption, or guardianship as well as young adults receiving aftercare services to obtain copies of their credit reports on an annual basis without cost.	
Policy Administration	
The Division of Child Welfare Services' Office of Operations is the owner of this policy. The Operations Director, or designee, shall review this policy annually from the date published in the Child Welfare Services Policy Manual, or as needed due to changes in law or practice.	
Policy Guidelines	
A. Credit Report Requests	1. The Identity Theft Coordinator must submit batch credit report requests for all the following until they exit foster care: a. Youth entering foster care at or after age 14 b. Young adults (18-20 years old) enrolled in extension of foster care 2. The Identity Theft Coordinator may only submit batch credit report requests to the following three nationwide credit reporting agencies: a. Equifax, b. Experian, and c. TransUnion. 3. Case managers must instruct young adults (18-20 years old) to complete DSS Form 1540: Young Adult Credit Check Consent to request a credit report annually while in extension of foster care.

Subject: Credit Reports for Youth and Young Adults

	a. The completed DSS Form 1540 must be submitted to independentliving@dss.sc.gov for processing. 4. If a credit check is needed outside the annual cycle (e.g., due to a break in service line or suspected identity theft), case managers must submit DSS Form 1534: Off-Cycle Request for Credit Report to independentliving@dss.sc.gov. 5. The Identity Theft Coordinator must notify requestors of approval or denial within 30 calendar days of receiving requests. 6. Only one (1) credit report from each credit reporting agency may be obtained within a 12-month period unless discrepancies are found or suspected. Note: <i>In the absence of the Identity Theft Coordinator, the Education Success and Career Development Program Coordinator, or their designee, assumes responsibility for credit report requests.</i>
B. Data Entry Guidelines	1. To prevent batch report requests from being rejected by the credit reporting agencies, CAPSS data must be entered in the proper format in the Person ID field for each youth and young adult. 2. If records are incorrect, the entire batch may be rejected by credit reporting agencies. 3. Data which must be entered accurately and verified are: - Name - Social Security Number - Date of Birth - Address (personal and placement) 4. Case managers must verify that the address where the youth or young adult resided at the time of removal in the current foster care episode is accurate and complete. 5. The address should be left blank only when the youth or young adult's last known permanent address cannot be identified. - If the youth or young adult was experiencing homelessness upon entry into foster care, extended foster care, or after-care, diligent efforts must be made to obtain the physical address of the last known permanent residence. - Case managers must document, in CAPSS dictation, that the youth or young adult was experiencing homelessness upon entry into care and the last known permanent address could not be identified.
C. Transition Plan Meeting	1. Prior to a youth or young adult's exit from foster care, a Transition Plan Meeting must be held to review and discuss the youth or young adult's credit report status. 2. Unless this information has already been entered into CAPSS for the current annual check, case managers shall contact the Identity Theft Coordinator prior to the Transition Plan Meeting to determine the following:

Subject: Credit Reports for Youth and Young Adults

	a. Whether a credit report was found during the most recent annual check b. The status of the credit report c. Instructions for accessing free annual credit reports post-transition 3. The aforementioned topics must be discussed during the Transition Plan Meeting and documented on DSS Form 1598: Chafee Foster Care Program Resource Checklist. Note: For detailed requirements related to Transition Plan Meetings for extended foster care and aftercare, refer to Policy 545 and Policy 546.
D. No Credit Report Found	1. If no credit report is found, the Identity Theft Coordinator must document this in CAPSS using the dictation tab, “Yearly Credit Check – No History” action code. 2. At the first face to face meeting between the case manager and the youth or young adult following the receipt of notification that no credit report was found, case managers must: a. Inform the youth or young adult that a credit report was not found b. Document the discussion in CAPSS dictation
E. Credit Report Found	1. If a credit report is found, the Identity Theft Coordinator must schedule a private meeting within 30 calendar days with the youth/young adult and case manager to: a. Review the report b. Review any discrepancies c. Discuss the resolution process and next steps taken to resolve the discrepancies d. Document discrepancies and resolution steps in a paper file and enter dictation in the Credit Report tab in CAPSS within 10 business days after the meeting 2. The Identity Theft Coordinator must: a. Provide the youth/young adult with a copy of the credit report b. Provide DSS Form 1587: Acknowledgement of Credit Report Receipt for the youth/young adult to sign c. Provide guidance on secure storage of credit reports 3. When applicable, the Identity Theft Coordinator must complete the following to resolve discrepancies for ages 14-17 years in foster care: a. Contact the three nationwide credit reporting agencies. i. When the youth is under age 18, please utilize DSS Form 1542: Uniform Minor’s Declaration b. Place an initial fraud alert c. Consider a credit freeze (if needed) d. Contact each company listed on the report where a fraudulent account was opened or misused

Subject: Credit Reports for Youth and Young Adults

	e. File a report with the Federal Trade Commission (FTC) f. Obtain an Identity Theft Affidavit from the FTC g. File a report for identity theft with local law enforcement where the youth/young adult resides h. File a complaint with the Internet Crimes Complaint Center (https://www.ic3.gov/) if the cause of the identity theft is undetermined (e.g., the person committing the theft is not currently known) i. File an Identity Theft Report with the South Carolina Department of Consumer Affairs (https://www.consumer.sc.gov/identity-theft-unit/id-theft) 4. For credit report discrepancies involving children ages 14-17 in foster care, if identity theft is confirmed and a possible offender is identified, a case consultation must be held with the following to determine whether the agency will pursue prosecution: a. Identity Theft Coordinator b. Education Success and Career Development Program Coordinator c. Office of General Counsel d. Office of Inspector General 5. For identity theft of children ages 14-17 in foster care, if prosecution is pursued, the Identity Theft Coordinator must: a. Notify credit reporting agencies b. Initiate a credit freeze c. File an identity theft report d. File a police report with the local jurisdiction e. Petition the court (or request assistance from the County Office of Victims' Assistance) for an expedited judicial determination of factual innocence if the identity thief was arrested for and convicted of a crime under the victim's identity or if the victim's identity was mistakenly associated with a record of criminal conviction 6. The Identity Theft Coordinator must advise young adults aged 18 and older on how to resolve credit report discrepancies that occurred while they were aged 20 or younger. The Identity Theft Coordinator will not initiate the activities to dispute these discrepancies. 7. All discussions with youth and young adults must be developmentally appropriate and tailored to their needs. a. If additional support is needed, the Identity Theft Coordinator may consult with the Education Success and Career Development Program Coordinator or designee.
F. Security, Retention, and Destruction of	1. Credit report details must not be shared with anyone other than the youth or young adult, except in cases involving law enforcement during a criminal investigation or prosecution.

Subject: Credit Reports for Youth and Young Adults

Credit Report Records	2. It is prohibited to share credit reports and information obtained from credit reports via email. 3. All sensitive records including, but not limited to, credit reports and discrepancy records must be stored in a locked file cabinet within the office of the Identity Theft Coordinator. 4. The Identity Theft Coordinator shall retain records for a period of three (3) years after a young adult's twenty-first (21st) birthday and shall destroy them thereafter. 5. Records will be destroyed immediately under any of the following circumstances: a. A youth or young adult declines to receive a physical copy of their credit report b. An error occurs (e.g., an additional copy of a credit report is produced)
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Forms and Related Documents	DSS Form 1534: Off-Cycle Request for Credit Report DSS Form 1540: Young Adult Credit Check Consent DSS Form 1542: Uniform Minor's Status Declaration DSS Form 1587: Acknowledgement of Credit Report DSS Form 1598: Chafee Foster Care Program Resource Checklist
Related Management Reports	SF200-R01 Yearly Credit Check – Detail SF200-R02 Yearly Credit Check – Summary SF200-R03 Yearly Credit Check – State Summary

Glossary	
Credit Freeze: an action that restricts access to an individual's credit report (i.e., a new credit account cannot be opened with the individual's information and remains in place until it is removed) Credit Report: any written, oral, or other communication of any information by a consumer reporting agency bearing on a consumers credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or expected to be used or collected in whole or in part for the purpose of serving as a factor in establishing the consumer's eligibility for credit or insurance, employment, or other purposes Identity Theft Affidavit: a form used to report information to several different companies to simplify the process of alerting companies where a new account was opened in the victim's name Identity Theft Coordinator: a designated point of contact in the state office Transition Services and Support unit who is responsible for monitoring, reviewing, and reconciling credit reports for all youth and young adults receiving foster care, extended foster care, or aftercare services Youth: a person who is 14-17 and in foster care Young Adult: a person who is at least 18 and no older than 21	