

## DEPARTMENT OF SOCIAL SERVICES

## CHILDREN'S DIVISION

P. O. BOX 88

JEFFERSON CITY, MISSOURI

August 3, 2012

**What's Inside:**

New process for obtaining credit information on youth in foster care ages 16 and 17

## M E M O R A N D U M

TO: REGIONAL EXECUTIVE STAFF, CIRCUIT MANAGERS, AND CHILDREN'S DIVISION STAFF

FROM: CANDACE A. SHIVELY, DIRECTOR

SUBJECT: Obtaining Credit Information for Older Youth

DISCUSSION: The purpose of this memorandum is to introduce a process for obtaining credit history information for youth in foster care ages 16 and 17. Memorandum [CD12-06](#) outlined requirements as a result of [The Child and Family Services Improvement and Innovation Act \(Public Law \(Pub. L.\) 112-34\)](#). A statewide e-mail issued on April 4, 2012 directed staff to continue obtaining credit checks for youth age 18, 19, 20 but rescinding requirements for 16 and 17 years olds until further guidance was received.

As part of the technical assistance provided by the Children's Bureau, a webinar was held on May 3, 2012 and guidance was provided for staff who work with older youth. The PowerPoint presentation from this webinar is available on the CD intranet under [Credit Reports](#) in the Older Youth Program Section. It is anticipated that more webinars will be held in the future and information will be made available by statewide e-mail as it is received.

Effective with this memo, all youth age 16 and 17, will receive a fraud prevention service check through Central Office. As youth in this age range cannot enter into contracts or credit transactions, the report will identify potential discrepancies and/or inaccuracies. For youth age 16 and 17, this information is not part of a consumer file rather is fraud prevention and therefore the information obtained cannot be used for establishing a youth's creditworthiness or eligibility for credit, insurance, employment, or for any other purposes unrelated to the detection, prevention or remediation of identity theft or other fraud against the minor youth.

The Children's Division has entered into an agreement with TransUnion to administer a web based portal system, TransUnion Direct, for obtaining credit discrepancies and/or inaccuracies on youth in which credit information would otherwise have to be obtained through the mail.

Initially, this will be done for all youth in Legal Status 1 age 16 and 17 and then on a monthly basis for youth turning 16 or coming into care at age 16 or 17. Staff will receive

notification on their youth via e-mail that the information was submitted. This is the date staff will record on the CD-94, Adolescent Family Support Team Guide and Individualized Action Plan. Staff will be notified if there are credit discrepancies and/or inaccuracies but will not receive a “report” for youth age 16 or 17. As this is the only notification staff will receive, it is vital to document upon receipt to ensure federal compliance. Staff should continue assisting youth age 18 and older in obtaining credit reports annually and ensuring that the youth has a copy of the report as discussed in [CD12-06](#). Free credit reports for youth age 18 and older may be obtained through [AnnualCreditReport.com](#).

Any information regarding a youth with a credit history should be shared with the youth. If discrepancies, fraud and identify theft are indicated, the Family Support Team and Division of Legal Services should be informed. For 18, 19, and 20 year olds there may be legitimate negative items due to late payments or debts. Regardless of the reason steps should be taken to help resolve these issues if possible. Slides 15-20 of [Credit Reports](#) outline steps to take to resolve these issues. Information to assist with interpretation and education can be found on the [Federal Trade Commission’s](#) website.

If there is a need to further educate youth regarding credit, Children’s Service Workers should address this on the CD-94, Adolescent Family Support Team Guide and Individualized Action Plan, by submitting new goals to the Chafee provider. The Chafee provider will assist with the identified tasks of the new goals.

All documentation, including correspondence from Central Office, pertaining to the credit checks should be filed in the Older Youth Section of the youth’s record. Supervisors should continue to monitor credit reports and information requirements.

<b>NECESSARY ACTION</b>	
<ol style="list-style-type: none"> <li>1. Review this memorandum with all Children’s Division staff.</li> <li>2. Review revised Child Welfare Manual chapters as indicated below.</li> <li>3. All questions should be cleared through normal supervisory channels and directed to:</li> </ol>	
<b>PDS CONTACT</b> Sally A. Gaines (573)522-6279 <a href="mailto:Sally.A.Gaines@dss.mo.gov">Sally.A.Gaines@dss.mo.gov</a>	<b>DEPUTY DIRECTOR</b> Marta Halter (573)751-2427 <a href="mailto:Marta.Halter@dss.mo.gov">Marta.Halter@dss.mo.gov</a>
<b>CHILD WELFARE MANUAL REVISIONS</b> Section 4 Chapter 21.3.5 <a href="#">Credit Reports</a>	
<b>FORMS AND INSTRUCTIONS</b> N/A	
<b>REFERENCE DOCUMENTS AND RESOURCES</b> <a href="#">Federal Trade Commission</a> <a href="#">AnnualCreditReport.com</a> <a href="#">Credit Reports</a>	

**RELATED STATUTE**

[The Child and Family Services Improvement and Innovation Act \(2011\)](#)

**ADMINISTRATIVE RULE**

N/A

**COUNCIL ON ACCREDITATION (COA) STANDARDS**

[FC 3](#), 8th Edition COA Standards

[PA-FC13](#)

**CHILD AND FAMILY SERVICES REVIEW (CFSR)**

N/A

**PROTECTIVE FACTORS**

Parental Resilience: N/A

Social Connections: N/A

Knowledge of Parenting and Child Development: N/A

Concrete Support in Times of Need: <http://dss.mo.gov/cd/info/cwmanual/philbase.pdf>

Social and Emotional Competence of Children:

<http://dss.mo.gov/cd/info/cwmanual/philbase.pdf>

**FACES REQUIREMENTS**

N/A