

## Foster Youth Credit Reports

**NOTE: Our case management system is moving from Child Welfare Services/Case Management System (CWS/CMS) to Child Welfare Services-California Automated Response and Engagement System (CWS-CARES). This policy includes language, forms/templates, and resources that will be reviewed and updated as we transition into CWS-CARES.**

(Revised 08/21/26)

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### Related Policy

Additional information can be found in the following policy:

- Critical Incident Protocol
- Case Plans

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### Forms

The following forms are referenced in this policy:

- 04-243 CRA - Dispute Letter for Minors
- 04-244 CRA – Dispute Letter for Adults
- [TILP 1](#) Transitional Independent Living Plan and Agreement

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### Background

[Senate Bill \(SB\) 1521](#) states, “existing law requires a county welfare department to request a consumer disclosure, pursuant to federal law, on behalf of a youth in a foster care placement in the county, when the youth reaches their 16<sup>th</sup> birthday, in order to ascertain whether the youth has been the victim of identity theft, as specified. This bill would revise and expand these consumer disclosure and identity theft provisions, by including Non-Minor Dependents(NMD) and requiring assistance to be given by the county welfare department, county probation, or the State Department of Social Services, as specified, on an annual basis while a youth or NMD is under the jurisdiction of the juvenile court.

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## Background (cont.)

The bill would require information relating to the yearly consumer credit report to be included in the youth's or NMD's case plan as specified." See the [Case Plans](#) policy for more information.

[SB 794](#) states, "existing law requires the county welfare department, county probation department, or the State Department of Social Services to annually obtain a credit report, as specified, for a youth in foster care who is 16 years of age or older. This bill would require that these services be provided to a youth in foster care who is 14 years of age or older."

[Assembly Bill \(AB\) 2935](#) deems certain requirements for the placement or removal of a security freeze for a protected consumer, individual who is under the jurisdiction of a county welfare or county probation department placed in a foster care setting, to be met if the request is from the county welfare or county probations department appearing on the most recent list provided to the consumer credit reporting agency (CRA) from the California Department of Social Services (CDSS) and the requesting entity provides sufficient proof of identification under federal law 15 U.S.C. Sec. 1681c-1(j)(1)(G).

If a security freeze/credit lock request received by one of the CRAs indicates that a foster youth has a consumer credit history, the information will be promptly blocked and not reported, in the same manner as if the CRA had received a police report pursuant to a specified provision relating to identity theft. The CRA is also required to comply with additional requirements relating to the blocking and unblocking of credit history information that is subject to investigation by the police or the Department of Motor Vehicles.

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## Policy

Child and Family Well-Being (CFWB) is required to obtain, for youth between the ages of 14-17, the youth's credit report or assist, for youth over the age of 18, an NMD with obtaining their credit report. CFWB receives quarterly reports from the California Department of Social Services (CDSS) indicating whether a youth or NMD in foster care has a credit report with any of the Credit Reporting Agencies (CRAs). Credit reporting requirements **do not** apply to the following:

- Youth in a voluntary placement
- Youth who exited foster care to guardianship
- Youth who exited foster care to adoption
- Youth who have been returned home even if the juvenile case remains open

Quarterly, CDSS sends data electronically for dependent youth ages 14-17 to the three CRAs (Experian, Equifax, and Transunion). To assure that CDSS obtains accurate information when completing this action, SWs must ensure that the youth's identifying information is accurate in CWS/CMS. The SW will verify that the following information in the Client Notebook is current:

- Correct spelling of the first, middle and last name
- Date of birth
- Social security number
- Current address and any previous address.

**NOTE:** Due to CDSS sending the information to the CRAs to inquire about any credit discrepancies for dependent minor youth, credit reports are not completed at the request of the SW. See [Obtaining Credit Reports](#) for more information.

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## Obtaining Credit Reports

Since the CRA information is confidential and sensitive, only the Continuous Quality Improvement (CQI) Policy Analysts (PAs) will have access to credit reports. They will back up each other to ensure that the following procedures happen.

The SW will:

- Receive an email from the CQI PA if a minor youth on their caseload has a credit report history.
- Assist the NMD with obtaining their credit report from one or all three CRAs.
- Ensure the youth/NMD receives assistance with interpreting the credit report and clearing any inaccuracies.
- Document all information related to credit reports in court reports and case plans.

It is considered good case practice to help educate foster youth and NMDs about the value of being knowledgeable about their own credit report. This should be an identified goal on the youth's/NMD's Transitional Independent Living Plan and Agreement (TILP), if applicable.

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## Confidentiality Regarding Credit Reports

The credit report is a confidential document containing Personal Identifying Information (PII). The SW will take all steps necessary to keep the credit report from being distributed improperly and to prevent the information contained in the credit report from being misused. **Do not** attach it to the court report.

The SW/PSS **will not** keep a copy of the credit report in the case file nor in their records. When reviewing the credit report with the youth, the SW will ensure that they are in a private and secure location to reduce the risk of an incident, when possible.

If there is a confidentiality breach, such as while going over the report with a minor youth the report was seen by a person not authorized to have that information, the SW will complete a Critical Incident Report (CIR) following the procedures outlined in the Reporting Procedures section of the [Critical Incident Protocol](#), noting that the type of the report is "Other".

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## Obtaining Credit Reports for Nonminor Dependents (NMDs)

SWs do not have the authority to access credit reports for NMDs due to their status as legal adults. SWs will assist NMD with accessing their credit report annually, pursuant to the free annual disclosure provision of the federal Fair Credit Reporting Act (15 U.S.C. Sec. 1681 et seq.). The SW will also ensure that the NMD receives assistance with interpreting the consumer credit report and resolving any inaccuracies. This assistance may include but is not limited to referring the NMD to a governmental or nonprofit agency that provides consumer credit services. The SW is not required to be the individual providing the direct assistance with the interpretation of the consumer credit disclosure or resolving the inaccuracies.

The NMD can access their credit report by going to each agency individually or by going to other sites where the NMD can run a report from all three CRAs. See [Credit Report Resources](#) for more information.

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**Credit Report  
Process for Youth  
Under 18 years of  
Age**

The following table outlines the credit report procedures for youth under 18 years of age:

| Step | Who           | Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | CDSS          | <ul style="list-style-type: none"> <li>• Receive an electronic batch from three CRAs quarterly.</li> <li>• Provide each county secure access to their county's list of youth who were submitted to the three CRAs indicating whether that youth has a credit report or not.</li> </ul> <p><b>NOTE:</b> Since youth under 18 years of age are not allowed to enter into legally-binding contracts, a credit report should not exist for them. If a report does exist for a youth, it is a red flag as this could reflect an error or possible fraudulent activity that could affect a youth's credit rating.</p> |
| 2    | PPS Data Unit | <p>Access the secure CDSS website and download San Diego's batch list.</p> <p>Run a report to obtain the:</p> <ul style="list-style-type: none"> <li>• Youth's name</li> <li>• Youth's age</li> <li>• SW's name</li> <li>• PSS's name</li> <li>• Region.</li> </ul> <p>Send the batch list combined with the above report information for each office/program to its respective CQI PA.</p>                                                                                                                                                                                                                     |
| 3    | CQI PA        | <p>Does a credit record exist for the youth?</p> <p>If yes, then go to Step 5.<br/>If no, then go to Step 4.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 4    | CQI PA        | <p>Inform the SW and PSS via email that a credit report does not exist for the youth.</p> <p>Complete the documentation in the credit notebook in CWS/CMS of no report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                     |

**Credit Report  
Process for Youth  
Under 18 years of  
Age (cont.)**

| Step | Who    | Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5    | CQI PA | <ul style="list-style-type: none"> <li>Request a credit report from all three CRAs via the County of San Diego's electronic account. See instructions in the next three sections to obtain a copy of the report from each CRA.</li> <li>Notify the PSS and SW via e-mail that a credit report exists for a youth on their caseload.</li> <li>Provide a link to the electronic copy of the report in the SharePoint folder to the SW/PSS.</li> <li>Maintain a tracking log that includes: <ul style="list-style-type: none"> <li>date the credit report was requested</li> <li>date credit report link was given to PSS/SW</li> <li>date PSS/SW notified the CQI PA that they had completed their response.</li> </ul> </li> <li>Monitor tracking log and follow up with PSS/SW monthly.</li> </ul> <p><b>NOTE:</b> If there is an indication of a credit report for a youth that is due to them having a different address, DOB, middle initial, etc., and not from having an actual credit discrepancy, notify the PSS and SW of the issue and document the reason for the report in the credit report notebook in CWS/CMS. No report will need to be sent to the PSS or SW for these instances.</p> |
| 6    | SW     | <p>Once the credit report information is received from the CQI PA:</p> <ul style="list-style-type: none"> <li>Discuss the information with the youth to determine if there is an inaccuracy in the credit report.</li> <li>Inform the youth about the sensitive nature of credit information.</li> <li>Ensure the youth receives assistance with interpreting the credit report and resolving any inaccuracies.</li> </ul> <p>If inaccuracies exist, send the <a href="#">04-243 CRA-Dispute Letter for Minors</a> to the CRA where the credit history exists. Attach the most recent minute order and a copy of the youth's birth certificate.</p> <p><b>NOTE:</b> Redact confidential (account numbers, SSNs, sibling names, caregiver names, etc.) information from the minute order that is attached to the letter.</p> <ul style="list-style-type: none"> <li>Document the above actions in the court report (Independent Living Program section of the status review report), and in the CWS/CMS Credit Report Notebook or in a contact. See <a href="#">Documenting Credit Reports in CWS/CMS</a> section below.</li> </ul>                                                                    |
| 7    | CQI PA | <p>Destroy the electronic credit report and revoke access to the link upon notification from the SW/PSS that they have received a response to the 04-243 CRA- Dispute Letter for Minors.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

**To Access Trans  
Union Credit  
Reports**

The CQI PA/back-up will do the following:

| Step | Action                                                                                                                                                                                                                                                                                                                                                             |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | <p>Log on to <a href="https://direct.transunion.com">https://direct.transunion.com</a> using your user name and password provided to you by the PPS Policy Analyst.</p> <p><b>NOTE:</b> If this is your first time accessing the site, you will need to follow the prompts to change your temporary password.</p>                                                  |
| 2    | After you are logged on, go to the “Individual Services” tab.                                                                                                                                                                                                                                                                                                      |
| 3    | <p>Select whether you are placing a single order or multiple orders. You will be directed to the “Choose a Service” page.</p> <ul style="list-style-type: none"> <li>• Select “Trans Union Credit Report” from the drop-down.</li> <li>• Inquiry Type: select “individual”</li> <li>• Leave the “permissible purpose” and “reference ID” field’s blank.</li> </ul> |
| 4    | <p>Complete the following information about the youth whose credit report you are requesting:</p> <ul style="list-style-type: none"> <li>• First and last name</li> <li>• Current or last known address</li> <li>• Social Security Number.</li> </ul> <p>You may leave the other fields blank.</p>                                                                 |
| 5    | <ul style="list-style-type: none"> <li>• Scroll to the top of the page and select the blue “order” button.</li> <li>• The site will inform you that your order was successfully submitted and a PDF version of the credit report will be on your screen.</li> <li>• Click the PDF icon to display the report.</li> </ul>                                           |
| 6    | If you need to order additional credit reports, click on “new order” repeat steps 3 and 4.                                                                                                                                                                                                                                                                         |
| 7    | <ul style="list-style-type: none"> <li>• Save and upload the report to the SharePoint folder.</li> <li>• Record the date the report was retrieved on the credit report log.</li> </ul>                                                                                                                                                                             |
| 8    | <ul style="list-style-type: none"> <li>• Email the assigned SW/PSS that a credit report exists for the youth.</li> <li>• Give access to the assigned SW/PSS to the SharePoint folder.</li> <li>• Record the date that access to the report was given to SW/PSS and the date notified that access was no longer needed.</li> </ul>                                  |
| 9    | Destroy the electronic report and revoke access for the SW/PSS to the SharePoint folder once notified by the SW/PSS that they have completed the process regarding inaccuracies in the report.                                                                                                                                                                     |

## To Access Equifax Credit Reports

The CQI PA/back-up will do the following:

| Step | Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | Log on to <a href="http://www.report.equifax.com">www.report.equifax.com</a> using your user name, and password provided to you by the PPS Policy Analyst.                                                                                                                                                                                                                                                                                                                                    |
| 2    | <p>From the home screen, select the 'Request New Report' tab. The 'Consumer Report' tab should appear.</p> <p>The 'reference' and 'product configuration' categories should already be filled out. Do not change them.</p> <p>Fill out the following information about the youth whose credit report you are requesting:</p> <ul style="list-style-type: none"><li>• First and last name</li><li>• Social Security Number</li><li>• Address</li><li>• Leave the other fields blank.</li></ul> |
| 3    | Click 'Run Consumer Report' at the bottom of the screen. The credit report should display automatically.                                                                                                                                                                                                                                                                                                                                                                                      |
| 4    | <ul style="list-style-type: none"><li>• Save and upload the report to the SharePoint folder.</li><li>• Record the date the report was retrieved on the credit report log.</li></ul>                                                                                                                                                                                                                                                                                                           |
| 5    | <ul style="list-style-type: none"><li>• Email the assigned SW/PSS that a credit report exists for the youth.</li><li>• Give access to the SharePoint folder to the assigned SW/PSS.</li><li>• Record the date that access to the report was given to SW/PSS and the date notified that access was no longer needed.</li></ul>                                                                                                                                                                 |
| 6    | Destroy the electronic report and revoke access for the SW/PSS to the SharePoint folder once notified by the SW/PSS that they have completed the process regarding inaccuracies in the report.                                                                                                                                                                                                                                                                                                |

## To Access Experian Credit Reports

The CQI PA/back-up will do the following:

| Step | Action                                                                                                                                 |
|------|----------------------------------------------------------------------------------------------------------------------------------------|
| 1    | Log on to <a href="#">experian-nab default - Sign In</a> using your user name, and password provided to you by the PPS Policy Analyst. |

**To Access Experian  
Credit Reports  
(cont.)**

| Step | Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2    | <ul style="list-style-type: none"> <li>From the home screen select the 'Products' tab.</li> <li>Select the 'Credit Profile Report' product.</li> <li>Select the following access subcode (Step 1): TBD3 1580201 SAN DIEGO, CA</li> <li>Leave the 'end user' and 'purpose type' field blank.</li> <li>Fill out the following information about the youth whose credit report you are requesting: <ul style="list-style-type: none"> <li>First and last name</li> <li>Social Security Number</li> <li>Address</li> <li>Leave the other fields blank.</li> </ul> </li> </ul> <p>Do <b>not</b> complete STEP 3 or STEP 4 on the website if prompted.</p> |
| 3    | Click 'submit' at the bottom of the screen. The credit report should display automatically                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4    | <ul style="list-style-type: none"> <li>Save and upload the report to the SharePoint folder.</li> <li>Record the date the report was retrieved on the credit report log.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 5    | <ul style="list-style-type: none"> <li>Email the assigned SW/PSS that a credit report exists for the youth.</li> <li>Give access to the SharePoint folder to the assigned SW/PSS.</li> <li>Record the date that access to the report was given to SW/PSS and the date notified that access was no longer needed.</li> </ul>                                                                                                                                                                                                                                                                                                                          |
| 6    | Destroy the electronic report and revoke access to the SharePoint folder upon notification by the SW/PSS that they have completed the process regarding inaccuracies in the report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

**Security Freeze/  
Credit Lock**

Although the California Civil Code does not require CFWB to request or remove a security freeze/credit lock on behalf of any foster youth, SWs are required to inform youth of any credit history and to ensure that they receive assistance in resolving any problems. During this conversation the SW will:

- Ask the youth if they would like to have a security freeze/credit lock placed on their credit.
- Document the youth's response in the Credit Report Notebook and
- If the youth requests a security freeze/credit lock, the SW will complete the 04-243 CRA - Dispute Letter for Minors and contact the CQI PA for their office/program to notify them of the request.

If a security freeze/credit lock is requested by the protected consumer's representative (SW), the CRA shall disclose the process for placing and removing a security freeze/credit lock. The CRAs are required to place a security freeze/credit lock within 30 days of receiving a request from a protected consumer's representative.

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**Security Freeze/  
Credit Lock (cont.)**

County welfare or county probation departments are unable to request a security freeze/credit lock for a protected consumer over the age of 18. The security freeze/credit lock requests will also not extend past the age of 18, if one is placed.

If a request to remove is not received by the CRA, a security freeze/credit lock will automatically expire on the protected consumer's 18<sup>th</sup> birthday unless the consumer instructs the CRA to maintain the freeze beyond that date directly or through their representative. Security freezes/credit locks can also be removed by the protected consumer's representative if the youth is 16 years or older under the following circumstances:

- foster care terminates
- youth requested removal
- Upon determination by the protected consumer's representative that the removal of the security freeze/credit lock is in the best interest of the protected consumer

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**Documenting Credit  
Reports in CWS/CMS**

For all youth aged 14 and over, including NMDs, the SW must document the youth's credit report status in the court report and in a contact in CWS/CMS, as applicable.

The SW must document the following in the court report in CWS/CMS:

- Dates that the credit reports were:
  - Received from the CQI PA
  - Reviewed with the youth
- How the youth was assisted with interpreting the credit report and resolved any inaccuracies, including referrals to government or nonprofit agencies that provide consumer credit services.
- The results of the youth's credit check in the "Independent Living Plan Services" section of the Status Review Hearing Report.
- No credit report received. Most youth will not have a credit report, but that information needs to be documented.

The SW will generate a new contact for the youth/NMD in the Contact Notebook in CWS/CMS. On the Associated Services page, the SW will indicate the Service Category, Independent Living Program Services and choose between the two Service Types:

- ILP Credit Results Reviewed with Youth, or
- ILP Discuss Credit Counsel/Participate

For youth aged 14-17, the CQI PA will ensure the credit report information is documented as a contact in the Credit Report section of CWS/CMS.

The CQI PA must document the following in the Credit Report Notebook section in CWS/CMS:

- Date the credit reports were requested from all three CRAs at no cost to the youth and who requested the reports;
  - Date the credit reports were received from the CRAs;
  - Status date and Status of the reports;
  - No credit report received. Most youth will not have a credit report, but that information needs to be documented; and
  - Any comment regarding notification of a credit report, but the CRA does not show an actual report, i.e. youth's current address is different than what is listed on the report.
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**Documenting Credit Reports in CWS/CMS (cont.)**

In the Request/Refusal Date box, the CQI PA will enter the date the request was made. The Request /Refusal Date cannot be less than the birth date.

After receiving notification that a credit report exists from the CQI PA, the SW will go to the Credit Report page to enter information in the comments and results sections. This is where the SW will note what was completed to resolve the inaccuracy. The SW must ensure that the date the report was provided to the youth and the date that the inaccuracy was cleared are documented on this page.

For NMDs, the SW will update the Credit Report Notebook, following the above procedures, indicating the date when the credit report was requested and which credit agency received the request from the NMD, the status date and status of the request. The SW will complete the comments and results sections as noted above, indicating what was done to resolve the inaccuracy. The SW will note "N/A – NMD Refused" if the NMD decides not to disclose this information.

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**Documentation**

The SW will document any information about a youth/NMD's credit report in the court report, case plan, and contact in CWS/CMS. The SW will indicate if there was a credit report and what steps were taken to clear up the inaccuracies.

In the court report in the Independent Living Section, the SW will state the date that the credit report was requested and reviewed with the youth, indicating how the inaccuracies in the report were cleared, if there were any.

When completing the Case Plan in the Case Plan Notebook, the SW will:

- Complete the Planned Client Services page with the Service Category, Independent Living Program Services marking the Service Type as either:
    - ILP Credit Results Reviewed with Youth, or
    - ILP Discuss Credit Counsel/Participate
  - Complete the Case Management Services page with the Service Category, Independent Living Program Services as either:
    - Credit Results Reviewed with Youth, or
    - Discuss Credit Counseling/Participation, or
    - Referral for ID Theft Services.
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**Out-of-County Youth**

For youth residing or placed out-of-county who are dependents of San Diego County, it is the responsibility of the SW to ensure the credit report is reviewed with the youth. This may be completed at a monthly compliance visit. If the case is receiving courtesy supervision from another county or state (so the other county/state is making the monthly contacts), then the San Diego SW **must** review the credit report with the youth over the phone. The San Diego SW may **not** give the report to the courtesy supervision worker.

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**Assistance**

The EFC PA, listed below, will assist the office/program CQI PAs who have been identified for access to the credit reports with resolving problems and issues and is the liaison for staff with the credit reporting agencies.

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**Resources**

The following resources are referenced in this policy:

- Credit Report Resources

Free Credit Report websites, not exhaustive:

- [www.annualcreditreport.com](http://www.annualcreditreport.com)
  - [www.freecreditreport.com](http://www.freecreditreport.com)
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**Alignment with SET**

This policy supports SET [Value 3](#) of assisting children in achieving their full potential through the continual focus on their well-being while they are in our care.

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