

<h1>ACF</h1> <p>Administration for Children and Families</p>	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration on Children, Youth and Families	
	<b>1. Log No:</b> ACYF-CB-IM-12-02	<b>2. Issuance Date:</b> 2-13-2012
	<b>3. Originating Office:</b> Children's Bureau	
	<b>4. Key Words:</b> Title IV-E Plan Pre-Print; Child and Family Services Improvement and Innovation Act; Case Plan; Credit Report; Extended Deadline	

### INFORMATION MEMORANDUM

**TO:** State, Tribal and Territorial Agencies Administering or Supervising the Administration of Title IV-E of the Social Security Act, Indian Tribes, Tribal Organizations and Tribal Consortia (Tribes).

**SUBJECT:** Extended deadline to implement and submit a title IV-E plan amendment – Annual Credit Report required by the Child and Family Services Improvement and Innovation Act (Public Law (Pub. L.) 112-34).

**LEGAL AND RELATED REFERENCES:** Section 475(5)(I) of title IV-E of the Social Security Act (the Act); ACYF-CB-PI-11-09.

**PURPOSE:** The purpose of this Information Memorandum (IM) is to extend the deadline to implement annual credit report requirements and re-submit section 2.D.6 of the title IV-E plan amendment.

**INFORMATION:** The President signed Pub. L. 112-34 into law on September 30, 2011. Pub. L. 112-34 amends the case review system definition to require that each child age 16 and older in foster care receive a copy of any consumer credit report annually until discharged from foster care, and must be assisted in interpreting the credit report and resolving any inaccuracies (section 475(5)(I) of the Act). This amendment became effective October 1, 2011, unless the Regional Office approved a delayed effective date permitted under certain conditions if the State was required to enact legislation to comply with this provision. In [ACYF-CB-PI-11-09](#), we instructed title IV-E agencies to submit a title IV-E plan amendment that incorporates the annual credit reporting provisions in section 2.D.6 by January 31, 2012. We are now extending the deadline as described below.

*Extension of the Deadline to Implement and Submit a Title IV-E Plan Amendment for Credit Reports for Youth in Foster Care:*

Title IV-E agencies have expressed difficulties implementing the annual credit report requirements, including determining how best to obtain credit reports on behalf of a child in foster care and identifying who is best suited to resolve any inaccuracies. The Children's Bureau (CB) is working with the U.S. Federal Trade Commission and the three national credit bureaus to provide technical assistance and guidance to title IV-E agencies<sup>1</sup> on annual credit reporting. CB will issue additional guidance to assist title IV-E agencies to comply with section 475(5)(I) of the Act and will provide a new deadline to implement the requirement and submit a revised title IV-E plan amendment.

In accordance with forthcoming guidance and an updated submission deadline, States that submitted a title IV-E plan amendment in accordance with the January 31, 2012 deadline, will also have the opportunity to resubmit their title IV-E plan amendment.

**Inquiries:** Children's Bureau Regional Program Managers

/s/

Bryan Samuels  
Commissioner

**Attachment:**

CB Regional Office Program Managers

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<sup>1</sup> We note that the annual credit report requirement applies to Tribes receiving title IV-B, subpart 1 funds. This delayed implementation deadline applies to Tribal IV-B agencies as well.

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