PROGRAM INSTRUCTION

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

SUBJECT: Annual Credit Report required by the Child and Family Services Improvement and Innovation Act (Public Law (P.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; ACYF-CB-IM-12-02.

PURPOSE: The purpose of this Program Instruction (PI) is to provide additional guidance on the implementation of the annual credit report requirements and the submission, or re-submission, of section 2.D.6 of the title IV-E plan amendment.

INFORMATION: The President signed P.L. 112-34 into law on September 30, 2011. Among other provisions, P.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 needed 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 by January 31, 2012 that incorporated the annual credit reporting provisions. ACYF-CB-IM-12-02, issued February 13, 2012, extended the deadline to submit the title IV-E plan amendment for this requirement in order to provide title IV-E agencies more information because the standard procedures to request a credit report for an adult cannot be used for a minor.

Background

What is a Credit Report?
A credit report is a record of a person’s credit activities. It lists any credit card accounts or loans the person has, the balances, and how regularly payments are made, as well as identifying information. Nationwide Credit Reporting Agencies (CRAs) are private companies that sell the
information in credit reports to creditors, insurers, employers and other businesses that use it to evaluate a person’s applications for credit, insurance, employment, or renting a home. There are three nationwide CRAs (TransUnion, Equifax, and Experian).

**What Information is in a Credit Report?**
A credit report contains identifying information, lists of accounts, credit inquiries, items of public record, and positive and negative entries.

- **Identifying Information** – The name (including nicknames and abbreviations), addresses (current and past), Social Security number, date of birth, and employment information used to identify an individual.

- **Credit Accounts** – The type of accounts (credit card accounts, mortgages or home equity loans, and installment accounts, like car loans), the date the accounts were opened, any credit limits, loan amounts, account balances, and payment history. This includes the contact information for the holder of the account.

- **Credit Inquiries** – When a person applies for credit or a loan, the lender may ask for a copy of the borrower’s credit report. The credit inquiries section of a credit report will list lenders who have accessed a person’s credit report within the last two years.

- **Public Records and Collections** – Information including bankruptcies, foreclosures, lawsuits, wage garnishments, liens, and judgments from state and county courts, and overdue debts from collection agencies.

- **Positive Accounts and Negative Items** – Positive information includes the payment of loans and other debts. Negative items include late payments and debt that was charged-off or was sent to a collection agency. Account numbers and addresses for creditors also are listed.

**Should Youth in Foster Care Have a Credit Report?**
No. Because minor children do not usually have the legal capacity to sign a contract or apply for credit on their own, most children and youth do not have credit reports. Therefore, if a credit report does exist for a person younger than 18, whether in foster care or not, it may be due to error, fraud or identity theft. The credit reporting agencies will not knowingly disclose credit report information for a minor, except to a parent, guardian or custodian of the child.

Therefore, in most cases, a title IV-B/IV-E agency requesting a credit report for a youth in foster care will simply be confirming that no such report exists. However, when a credit report does exist for a youth, it indicates that there is likely a need to correct information and take action to protect the identity and future credit worthiness of the youth.
**What is Child Identity Theft?**
Child identity theft happens when someone uses a minor’s personal information to commit fraud. A thief may steal and use a child’s information to get a job, government benefits, medical care, utilities, car loans, or a mortgage. Avoiding, discovering, and undoing the damage resulting from the theft of a child’s identity can be a challenge.

Adults can monitor their own credit reports every few months to see if someone has misused their information, and order a fraud alert or credit freeze on their credit files to stymie further misuse. A thief who steals a child’s information may use it for many years before the crime is discovered.

Children and youth in foster care are particularly vulnerable to identity theft because their personal information is often shared widely among various caretakers, service providers and schools. The misuse of the child’s identity may not be discovered until the youth exits the foster care system and applies for a cell phone, job, student loan or apartment.

When a child or youth in foster care is a victim of identity theft, there may be a credit report associated with the youth, but it may contain errors in the identifying information, like the date of birth and address. This is because the thief may use the child’s Social Security number, but his own date of birth and address. The title IV-B/IV-E agency may have knowledge of different birthdates, Social Security numbers, and names used for the child or youth in foster care and providing this information to the CRAs will help them determine if a credit report does exist for the youth.

**What Steps Need to be Taken to Clear a Credit Report for a Youth in Foster Care?**
Attachment E to this PI contains information on the steps to be taken to address inaccuracies in a credit report, as well as additional resources for assistance. The title IV-B/IV-E agency may wish to reach out to any consumer protection agency or an Attorney General’s Office to determine if additional assistance may be available to the agency to address credit report errors or child identity theft.

**Further Guidance on Obtaining Credit Reports for Youth in Foster Care**

**How Does the IV-B/IV-E Agency Make Contact with the Credit Reporting Agencies?**
Youth in foster care qualify for a free credit report annually from each of the major credit reporting agencies under the Fair Credit Reporting Act (FCRA), but a common method to obtaining such reports for adults, the www.annualcreditreport.com website, **cannot** be used to obtain the credit report of a minor child.

To facilitate successful implementation of the requirement to check credit reports for youth in foster care, the Children’s Bureau (CB) has met with each of the three major CRAs, individually and as a group, to discuss the new requirement to obtain the credit report of youth ages 16 and older in foster care and to obtain information to provide to title IV-B/IV-E agencies on how best to comply with this new requirement since the website cannot be used. Each of the three main CRAs has provided information that is included in Attachments B – D of this PI.
CB has discussed the idea of the CRAs developing a universal or automated process to obtain the credit reports of youth in foster care (or verify that one does not exist). While the CRAs are exploring possibilities, no such mechanism or system is currently available. However, each CRA has provided information on who to contact at each of the agencies so that each the title IV-B/IV-E agency and each CRA can develop a workable approach to obtaining the credit reports of youth in foster care.

In discussion with the CRAs, it is apparent that one main concern of the CRAs is to create a process that addresses concerns around authentication, including:

- **Establishing and Verifying the Identity of the Requestor.** The CRAs need verification that the individual who is requesting the information has the legal authority to do so. Therefore, in developing an approach to meet the requirement, the title IV-B/IV-E agency will need to consider what document can be provided to the CRA as proof that person has the right to request a credit report on behalf of a minor child in the placement and care of the title IV-B/IV-E agency (e.g., a copy of a government agency ID badge).

- **Establishing and Verifying that the Youth is in Foster Care.** To prove that the youth is in foster care, CRAs will ask for a court order or other documents that establishes that the youth is in foster care. We have provided the information to the CRAs that a child in “foster care” is in the placement and care of the title IV-B/IV-E agency.

In order to determine if a credit report exists for a youth, the CRAs need as much information as possible to search their records to find matches. This includes information on last known address, other birthdates, and nicknames.

**Must a title IV-B/IV-E Agency Contact All Three Credit Reporting Agencies?**

Yes. Section 475(5)(I) of the Act states that youth who have attained 16 years of age must receive, without cost, a copy of any consumer report (as defined in section 603(d) of the Fair Credit Reporting Act). Therefore, to be in compliance with this requirement, the title IV-B/IV-E agency must have a copy of the credit report, if one exists, from each of the three main CRAs: TransUnion, Equifax, and Experian.

However, it may be more productive to begin with one CRA and then to request information sequentially from the other CRAs, so that any errors corrected with one agency can have had time to be cleared from the reports of the other CRAs before the second and third credit reports of youth in foster care are requested and reviewed.

**Does the Requirement to Obtain Credit Reports Apply to Youth Age 18 and Older in Foster Care?**

For title IV-E agencies that have exercised either the title IV-E option to redefine “child” and increase the maximum age for title IV-E or that exercised the AFDC plan option to serve and claim title IV-E for youth past age 18, the requirement to assist foster youth age 18 or older in obtaining credit reports is applicable. However, because these young people have reached the legal age of majority, they may also request their own free credit report. Therefore, the title IV-B/IV-E agency must have an approach in place to work with the young adult in foster care to obtain their credit report and then work with them to dispute any inaccuracies. If a youth over
age 18 objects to having his credit report requested, the IV-E agency must document efforts to comply with 475(5)(I). In this instance, the title IV-B/IV-E agency will not be considered out of compliance if it fails to obtain a credit report due to the young adult’s objection.

**Action Required**

Title IV-E agencies must submit their title IV-E plan amendment to show compliance with this requirement by **August 13, 2012**. Title IV-E agencies that submitted a title IV-E plan amendment in accordance with the earlier January 31, 2012 deadline listed in ACYF-CB-PI-11-09 may resubmit their title IV-E plan amendment.

In addition, section 422(b)(8) of the Act requires that each State and Tribe receiving funds under title IV-B, subpart 1 provide an assurance that it is operating a case review system, as defined in section 475(5) of the Act, for children in foster care. As previously noted, the requirements relating to annual credit reports are included in the definition of the case review system at section 475(5), therefore, the requirement to obtain credit reports for youth in foster care is also applicable to children under the jurisdiction of Tribes receiving title IV-B, subpart 1 funds.

Federal regulations at 45 CFR 1357.15(q) require a State to jointly develop with the Tribes within its borders, the arrangements made for the provision of the child welfare services and protections in section 422(b)(8) to Indian children under both State and Tribal jurisdiction and address the understanding reached in the Child and Family Services Plan (CFSP) and the Annual Progress and Services Report (APSR). Tribes also are asked to address this issue in their CFSP and APSR submissions. Therefore, States are required to consult with Tribes to determine how the provision relating to annual credit reports will be met for Tribal children and must address the understanding reached no later than in the APSR that will be due June 30, 2013.

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

/s/

Bryan Samuels
Commissioner

**Attachments:**

A - CB Regional Office Program Managers

B - Information From Equifax

C - Information From Experian

D - Information From TransUnion

E - How to Clear A Youth in Foster Care’s Credit Report

F - Resources from the U.S. Federal Trade Commission
<table>
<thead>
<tr>
<th>Region</th>
<th>City</th>
<th>Contact Person</th>
<th>Email</th>
<th>Address</th>
<th>Phone</th>
<th>States and Territories</th>
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</thead>
<tbody>
<tr>
<td>I</td>
<td>Region I - Boston</td>
<td>Bob Cavanaugh</td>
<td><a href="mailto:bob.cavanaugh@acf.hhs.gov">bob.cavanaugh@acf.hhs.gov</a></td>
<td>JFK Federal Building, Rm. 2000</td>
<td>(617) 565-1020</td>
<td>Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont</td>
</tr>
<tr>
<td>II</td>
<td>Region II - New York City</td>
<td>Junius Scott</td>
<td><a href="mailto:junius.scott@acf.hhs.gov">junius.scott@acf.hhs.gov</a></td>
<td>26 Federal Plaza, Rm. 4114</td>
<td>(212) 264-2890</td>
<td>New Jersey, New York, Puerto Rico, Virgin Islands</td>
</tr>
<tr>
<td>III</td>
<td>Region III - Philadelphia</td>
<td>Lisa Pearson</td>
<td><a href="mailto:lisa.pearson@acf.hhs.gov">lisa.pearson@acf.hhs.gov</a></td>
<td>150 S. Independence Mall West - Suite 864</td>
<td>(215) 861-4000</td>
<td>Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia</td>
</tr>
<tr>
<td>IV</td>
<td>Region IV - Atlanta</td>
<td>Ruth Walker</td>
<td><a href="mailto:ruth.walker@acf.hhs.gov">ruth.walker@acf.hhs.gov</a></td>
<td>Atlanta Federal Center</td>
<td>(404) 562-2900</td>
<td>Alabama, Mississippi, Florida, North Carolina, Georgia, South Carolina, Kentucky, Tennessee</td>
</tr>
<tr>
<td>V</td>
<td>Region V - Chicago</td>
<td>Angela Green</td>
<td><a href="mailto:angela.green@acf.hhs.gov">angela.green@acf.hhs.gov</a></td>
<td>233 N. Michigan Avenue</td>
<td>(312) 353-9672</td>
<td>Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin</td>
</tr>
<tr>
<td>VI</td>
<td>Region VI - Dallas</td>
<td>Janis Brown</td>
<td><a href="mailto:janis.Brown@acf.hhs.gov">janis.Brown@acf.hhs.gov</a></td>
<td>1301 Young Street, Suite 945</td>
<td>(214) 767-8466</td>
<td>Arkansas, Louisiana, New Mexico, Oklahoma, Texas</td>
</tr>
<tr>
<td>VII</td>
<td>Region VII - Kansas City</td>
<td>Rosalyn Wilson</td>
<td><a href="mailto:rosalyn.wilson@acf.hhs.gov">rosalyn.wilson@acf.hhs.gov</a></td>
<td>Federal Office Building</td>
<td>(816) 426-3981</td>
<td>Iowa, Kansas, Missouri, Nebraska</td>
</tr>
<tr>
<td>VIII</td>
<td>Region VIII - Denver</td>
<td>Marilyn Kennerson</td>
<td><a href="mailto:marilyn.kennerson@acf.hhs.gov">marilyn.kennerson@acf.hhs.gov</a></td>
<td>1961 Stout Street - 9th Floor</td>
<td>(303) 844-3100</td>
<td>Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming</td>
</tr>
<tr>
<td>IX</td>
<td>Region IX - San Francisco</td>
<td>Douglas Southard</td>
<td><a href="mailto:douglas.southard@acf.hhs.gov">douglas.southard@acf.hhs.gov</a></td>
<td>90 7th Street - 9th Floor</td>
<td>(415) 437-8425</td>
<td>Arizona, California, Hawaii, Nevada, Outer Pacific—American Samoa</td>
</tr>
<tr>
<td>X</td>
<td>Region X - Seattle</td>
<td>Tina Minor</td>
<td><a href="mailto:tina.minor@acf.hhs.gov">tina.minor@acf.hhs.gov</a></td>
<td>2201 Sixth Avenue, Suite 300, MS-70</td>
<td>(206) 615-3657</td>
<td>Alaska, Idaho, Oregon, Washington</td>
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</table>
Equifax requests that any State Foster Care Agency seeking to fulfill its obligations to request a credit report under the “Child and Family Services Improvement and Innovation Act” please contact one of the below individuals:

- Gary Poch – 678-795-7787 or gary.poch@equifax.com
- Troy Kubes – 678-795-7777 or troy.kubes@equifax.com

Equifax also provides information on its website to assist with issues of identity theft, fraud alerts and security freezes. Please visit www.equifax.com for more information.
Foster Youth Process for requesting a copy of the personal credit report:

- State or Tribal Agency will send proof of a court ordered document for each person they are requesting a credit report indicating that the youth is in foster care and provide documentation of their ability to act in that capacity. Sensitive information can be redacted from the court order as long as the identification of the minor remains intact. We recommend using USPS Priority, UPS or FedEx because they offer a tracking feature. The address for Experian is
  Experian National Consumer Assistance Center
  PO Box 9701
  Allen, Texas 75013
- State or Federal Agency will include a form with all of the youth identification information including, full name, current address, social security number, date of birth, address within the past two years.
- Upon receipt, the NCAC will process the request under the annual free credit report type and send the report to the requestor (agency) through regular mail. The report will either be a “no record”, or have information. For security purposes, the envelope will not indicate Experian. If there is a report, the account information will be truncated, the Social Security Number for the youth will not appear on the report and any variations of the Social Security Number, will be truncated. Please specify in the request the State or Federal agency address to which you want the no record or credit report sent.
- There is no charge for this process.

Foster Youth process for disputing the file through the National Consumer Assistance Center (NCAC):

- If the agency chooses to dispute items on the youth’s report, they must submit to us the court ordered document indicating that the youth is in foster care and documentation for the agency to act in the capacity of the court order.
- The agency shall send all identification information of the youth, including full name, current address, and social security number, date of birth, address within the past two years or the credit report number from the report that was received.
- Agency shall indicate what accounts do not belong to the youth, indicating that the youth is a minor child
- A dispute process will be initiated with the designated creditor and the results will be sent to the designated agency.
Note: The State or Federal agency may also choose to dispute any information reported directly with the data furnisher.

Contact information for questions:

Cathy Jones
Director Regulatory Compliance and Risk Management
Phone: 714 830-7218
Email: cathy.jones@experian.com

Alternate Contact:

Jonathan Sepe
Compliance Specialist Lead
Phone: 714 830-7227
Email: jonathan.sepe@experian.com
State Foster Care Agencies seeking information on how to work with the national credit reporting companies to meet their obligations under the „Child and Family Services Improvement and Innovation Act” may contact TransUnion directly:

- Angela Harp at 714-680-7268 or aharp@transunion.com, or
- Eric Rosenberg at 312-466-6323 or erosenb@transunion.com

State Foster Care Agencies may register for secure online access to check for the presence of minor credit file via “TU Direct.” Nominal one-time set up charge and annual fee apply.

If a parent or guardian suspects that identity thieves may have already targeted their child, they may access our free, secure online form at www.transunion.com/childidentitytheft to submit details about their concerns and we will investigate the existence of a potential credit file in the child's name.

For assistance with fraud resolution, call 800-372-8391 or write:

PO Box 6790
Fullerton, CA 92831
Attn: Foster Youth Fraud Investigations
How to Clear A Youth in Foster Care’s Credit Report

How do I clear a foster child’s credit report?
If you discover that a foster child is a victim of identity theft, take the following steps on the youth’s behalf to prevent further harm. Each CRA has varying processes to handle requests for minors when they have been a victim of identity theft but below is a general outline of what to do. Keep a written record with the details of your efforts and copies of all correspondence.

1. Contact the credit reporting companies
Contact the three nationwide credit reporting companies. Explain that the child is a minor and cannot legally enter into any type of contract. To prove that the child is a minor, send the credit reporting companies a copy of the child’s birth certificate or other documentation of age, such as a court order, and a letter asking them to remove all accounts, application inquiries, and collection notices from the credit report associated with the child’s name or personal information. Documentation may also be needed to verify that the youth is in foster care and the agency is authorized to act of the youth’s behalf.

2. Place an initial fraud alert
If a credit report was created for the child as a result of identity theft, consider placing an initial fraud alert on the report. An initial fraud alert requires potential creditors to verify a person’s identity before extending credit. When a creditor knows that a minor child is involved, it will not ordinarily extend credit.

To place an initial fraud alert, contact any one of the three credit reporting companies. The company that you call must contact the other two. All three will place the initial fraud alert on the report they have for the child. After you place the initial fraud alert, the credit reporting company will explain your rights, including your right to get a free credit report from each credit reporting company.

3. Consider a credit freeze
If there is a credit report for the child, you can also consider placing a credit freeze. If you place a credit freeze (also known as a security freeze), potential creditors cannot get the child’s credit report, which makes it less likely an identity thief can open new accounts. You must contact each of the three credit reporting companies directly to place a freeze. The credit reporting companies may ask for proof of the child’s Social Security number, proof that you are legally able to represent/are the child’s legal representative, and a copy of the child’s birth certificate. Putting a freeze on a minor’s credit report can be a useful deterrent to additional fraud.

You must lift the freeze from the credit report before the minor child applies for student or auto loans, an apartment, or job. Once the child turns age 18, he/she can ask to lift the freeze himself.

Although businesses do not ordinarily extend credit to a minor, you also should consider placing an extended fraud alert – which lasts for seven years – on the credit report. When a business sees
an alert on a credit report, it must verify the borrower’s identity before issuing credit. Identity theft victims – including children and youth in foster care – can have an extended alert placed on their credit reports if they can provide an Identity Theft Report to the credit reporting company.

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<tr>
<th>What It Is</th>
<th>What It Does</th>
<th>How to Get It</th>
<th>What it Costs</th>
<th>How Long It Lasts</th>
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<tr>
<td><strong>Initial fraud alert</strong></td>
<td>Requires creditors to verify an identity before granting credit and makes it harder for a thief to open fraudulent new accounts.</td>
<td>Contact one credit reporting company. It will share your request with the other two companies.</td>
<td>Free</td>
<td>90 days</td>
</tr>
<tr>
<td><strong>Extended fraud alert</strong></td>
<td>Requires creditors to verify an identity before granting credit and makes it harder for a thief to open fraudulent new accounts.</td>
<td>Contact one credit reporting company. It will share your request with the other two companies.</td>
<td>Free</td>
<td>7 years</td>
</tr>
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<td><strong>Credit freeze</strong></td>
<td>Stops creditors from getting your credit report unless you lift the freeze.</td>
<td>Contact each credit reporting company.</td>
<td>Depends on state law</td>
<td>Depends on state law</td>
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4. **Call every company where an account was fraudulently opened or misused**
If you already know where the child’s information was misused, contact that business and explain to the business that the individual is a minor. Otherwise, when you receive the child’s credit report, review it for any accounts opened in the child’s name. If you see a fraudulent account in the child’s name, contact the company where the account was opened. Ask the company to close the fraudulent account and flag the account to show it is a result of identity theft. Follow up with each business in writing.

Once you have resolved identity theft disputes with the company, ask for a letter stating that the company has closed the disputed accounts and has discharged the fraudulent debts. This letter will enable the youth in foster care to dispute erroneous charges if errors relating to the account reappear on his credit report in the future.
5. File a report with the Federal Trade Commission (FTC)
Visit www.ftc.gov or call 1-877-IDTHEFT (1-877-438-4338) to file a report about the theft of the child’s identity.
After you file a report with the FTC, print a copy. It will be called an Identity Theft Affidavit. Give a copy of your FTC Identity Theft Affidavit to the police if you file a police report.

6. File a police report
Usually, adults must file a police report about identity theft before they can use certain legal remedies to clear a credit report. The situation may be different for children, because credit reporting companies may correct a child victim’s credit report without a police report. Even so, it is important to consider filing a police report, because you may need it to resolve other instances of identity theft.

You will need to send the credit reporting company a letter or other documentation explaining that the child is a minor who cannot legally enter into a contract. After you provide proof that the victim is a minor, the credit reporting companies and businesses should correct the fraudulent information that the identity thief created.

7. Get an Identity Theft Report
Ordinarily, providing information that the youth is a minor should be sufficient to correct fraudulent debts on the youth’s credit report, but you also might consider taking advantage of rights available to identity theft victims under the Fair Credit Reporting Act (FCRA). The FCRA enables identity theft victims to block erroneous charges from appearing on their credit reports and to get documents like applications and contracts to prove the underlying crime. For more information, see Remedying the Effects of Identity Theft at http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt09.pdf.

To take advantage of these remedies, an identity theft victim must get an Identity Theft Report. Creating an Identity Theft Report involves 3 steps:

1. Submit a complaint about the theft to the FTC. When you finish writing all the details, print a copy of the report. It will print as an Identity Theft Affidavit.
2. File a police report about the identity theft, and get a copy of the police report or the report number. Bring the FTC Identity Theft Affidavit when you file a police report.
3. Attach the FTC Identity Theft Affidavit to your police report to make an Identity Theft Report.

Some companies want more information than the Identity Theft Report includes, or want different information. The information you need to provide depends on the policies of the credit reporting company and the business that sent the information about you to the credit reporting company.
Resources from the U.S. Federal Trade Commission

Deter, Detect, Defend: Avoid ID Theft
http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt01.pdf

Probono Guide
http://www.idtheft.gov/probono

Taking Charge: What To Do if Your Identity is Stolen

Medical Identity Theft

Statement of Rights

Annual Credit Report
www.annualcreditreport.com

Credit, ATM, and Debit Cards

Getting Credit: What You Need To Know About Credit

Building a Better Credit Report
http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre03.pdf

Credit Repair: How to Help Yourself

Credit and Debit Blocking

Credit and Your Consumer Rights
http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre01.pdf