

COUNTY OF SHASTA		Number
ADMINISTRATIVE MANUAL		8-510
SECTION:	Miscellaneous	Verification of Address
INITIAL ISSUE DATE:	October 28, 2008	
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PURPOSE

This policy applies to a County department’s use of a consumer report provided by a consumer reporting agency for employment purposes or other purposes authorized by law. It is designed to comply with the requirements of 16 C.F.R. § 681.1.

BACKGROUND

- A. Consumer Report - Any written, oral, or other communication of any information by a consumer reporting agency bearing on an individual ’s creditworthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or expected to be used for employment purposes or other purposes authorized by law.
- B. Consumer Reporting Agency - A person or entity which, for monetary fees, dues, or on a cooperative nonprofit basis, regularly engages in whole or in part in the practice of assembling or evaluating credit information or other information on individuals for the purpose of furnishing consumer reports to third parties.
- C. Notice of Address Discrepancy - A notice sent by a consumer reporting agency informing of a substantial difference between the address for the individual that was provided to request the consumer report and the address(es) in the consumer reporting agency’s file for the individual.

POLICY

- A. Should a County department receive a notice of address discrepancy from the consumer reporting agency that provided the department with a consumer report, the County department shall attempt to form a reasonable belief that the consumer report it received relates to the individual about whom it requested the report. In attempting to form this reasonable belief, the department shall do at least one of the following:
 - 1. Compare the information in the consumer report provided by the consumer reporting agency with information the department:
 - a. Maintains in its own records, such as applications, change of address notifications, or other such documents; or

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- b. Obtains from third-party sources; or
- 2. Verify the information in the consumer report provided by the consumer reporting agency with the individual.
- B. If an employment relationship or other continuing relationship is established with the individual and the County department regularly and in the ordinary course of business furnishes information to the consumer reporting agency from which the notice of address discrepancy pertaining to the individual was obtained, the department must furnish to that consumer reporting agency an address for the individual that the department has reasonably confirmed is accurate. The department may reasonably confirm an address is accurate by:
 - 1. Verifying the address with the individual about whom it has requested the report;
 - 2. Reviewing its own records to verify the address of the individual;
 - 3. Verifying the address through third-party sources; or
 - 4. Using other reasonable means.

The department will furnish the individual's address that the department has reasonably confirmed is accurate to the consumer reporting agency as part of the information the department regularly furnishes for the reporting period in which an employment relationship or other continuing relationship with the individual is established.

RESPONSIBLE DEPARTMENTS

County Administrative Office
County Counsel
Support Services

REFERENCES

BOS Policy Resolution No. 2008-04--10/28/08