

# Notices of Address Discrepancies Received in the Use of Consumer Credit Reports

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## About This Policy

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**Responsible University Administrator:**

Vice President and Chief Financial Officer

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## Scope

All Indiana University units and employees.

## Policy Statement

Upon receipt of a consumer credit report from a credit report agency (CRA) that contains a notice of address discrepancy, the university user shall take necessary measures to form a reasonable belief that the credit report pulled relates to the individual for whom the report was requested.

Business units within the university that regularly and in the ordinary course of business furnish information to a CRA, shall report back to the CRA from whom they received a notice of address discrepancy and furnish an address they have reasonably confirmed is accurate.

## Reason For Policy

Establish policy and procedures to be followed by users of consumer credit reports upon the receipt of a notice of address discrepancy from a nationwide consumer reporting agency (CRA).

One of the Federal Trade Commission's (FTC) regulations implementing its new "Red Flag" rules, specifically 16 C.F.R. Part 681.1, applies to users of consumer credit reports who receive a notice of address discrepancy from one of the three nationwide consumer reporting agencies. The regulation requires such users to develop and implement reasonable policies and procedures designed to enable the user to form a reasonable belief that a consumer report relates to the consumer about whom it has requested the report, when the user receives a notice of address discrepancy. For users who form a continuing relationship with the consumer and regularly and in the ordinary course of business furnish information to the CRA from which the notice of address discrepancy relating to the consumer was obtained, the user must report back to the CRA and furnish an address for that consumer that the user has reasonably confirmed is accurate.

Certain business units and departments within the university obtain consumer credit reports from one of the three, and are therefore considered "users" for purposes of the FTC regulation.

## Procedure

1. Any and all users of consumer credit reports within the University, whether obtained directly from a CRA or from a third-party reseller, shall track each report for a notice of address discrepancy.
2. Upon receipt of a credit report that contains a notice of address discrepancy, the user shall take the following steps to form a reasonable belief that the credit report provided relates to the individual for whom the report was requested:
  - i. Compare information in the credit report provided with information the user maintains within its files for that particular individual; and
  - ii. When appropriate, verify the information contained within the credit report through third-party sources; and
  - iii. When appropriate, verify the information contained within the credit report with the individual.
3. In addition, users who have a continuing relationship with the individual for whom they have received a notice of address discrepancy, and who regularly and in the ordinary course of business furnish information to the CRA from which the notice relating to the individual was obtained, shall take the following additional steps upon completion of Procedure No. 2 above:
  - i. Report back to the CRA to furnish an address for the individual that they have reasonably confirmed is accurate; and
  - ii. Report back to the CRA as part of the information the user regularly furnishes for the reporting period in which it establishes a relationship with the individual.

## Definitions

**Users:** For the purpose of this policy "users" are individuals who in the course of their positions have needed to use a consumer credit report for any individual and for any reason. The receipt of the report automatically requires the user to follow the requirements of this policy.

## History

The source to this policy is:

Federal Trade Commission Regulations