



TITLE	POLICY NUMBER	
Address Confidentiality Program	DCS 07-12	
RESPONSIBLE AREA	EFFECTIVE DATE	REVISION
Audit Management Services	12/7/2022	4

I. POLICY STATEMENT

As a state government entity, Arizona Department of Child Safety (DCS) is required to comply with the Arizona Address Confidentiality Program (ACP). The ACP is administered through the Arizona Secretary of State's office. ACP allows a person who has been subjected to domestic violence offenses, sexual offenses, or stalking to keep a residential address and telephone number confidential by using a substitute address.

II. APPLICABILITY

This policy applies to all DCS employees, contractors, interns, volunteers and external partners (collectively "employees") and their respective programs and operations, and to all active ACP participants with current or past involvement with the Department.

III. AUTHORITY

[A.R.S § 41-161](#)

Definitions

[A.R.S § 41-162](#)

Address confidentiality; duties of secretary of state; application assistant; program termination

[A.R.S § 41-163](#)

Filing and certification of applications; authorization cards

[A.R.S § 41-164](#)

Change of name, address or telephone number; cancellation of certification

<u>A.R.S § 41-165</u>	Disclosure of actual address prohibited; violation; classification
<u>A.R.S § 41-166</u>	Address use by state or local government entities
<u>A.R.S § 41-167</u>	Request for disclosure
<u>A.R.S § 41-168</u>	Nondisclosure of address in court proceedings

IV. DEFINITIONS

Active ACP Participant: A parent, child, or other individual whose participation in the ACP is not expired or cancelled and can be verified by the Office of the Secretary of State.

ACP Authorization Card: The card presented to an ACP participant by the Secretary of State's Office identifying the person as an ACP participant. The card contains the ACP substitute address, and the effective and expiration dates of the person's participation in the ACP program.

Actual address: The residential, work, or school address on an individual's Address Confidentiality Program application. The actual address includes the county and the voting precinct number. This address is a participant's confidential address.

Address Confidentiality Program (ACP): The program established by Title 41, Chapter 1, Article 3 of the Arizona Revised Statutes. The program is administered by the Secretary of State to protect the confidentiality of the actual address of a relocated victim of domestic violence, a sexual offense, or stalking.

ACP liaisons: DCS employees within Audit Management Services unit assigned to work with the Secretary of State and other DCS employees to respond to ACP inquiries.

Audit Management Services (AMS): The unit assigned to manage the Address Confidentiality Program.

Date of Issuance (DOI) or Date of Certification: The date that the program participant applied to be certified in the program. It is also known as the "enrollment date" in this policy and the "Address Start Date" in Guardian.

Department or DCS: The Arizona Department of Child Safety.

Employees: For the purpose of this policy, employee means all DCS full-time, part-time, intermittent, and temporary employees; contractors; interns; volunteers and external partners.

Leadership Team: Employees who directly report to the Senior Leadership Team and who administer operational and program areas within DCS.

Non-Emergency Disclosure: The process for requesting disclosure of an ACP participant's actual address for a state or local government agency for statutory or administrative use.

Record: All documents, papers, letters, maps, books, photographs, films, sound recordings, magnetic or other tapes, digital data, artifacts or other documentary material, regardless of physical form or characteristics, made or received pursuant to law or ordinance in connection with the transaction of public business by a state or local government entity.

Senior Leadership Team: Director and Deputy Director direct reports who manage operational and program areas within DCS.

State or local government entity: Every elected or appointed state or local public office, public officer or official, board, commission, bureau, committee, council, department, authority, agency, institution of higher education or other unit of the executive, legislative or judicial branch of this state. This also includes any city, town, county, public school or other kind of municipal, quasi-municipal or public corporation but does not include an agricultural improvement district.

Substitute address: An address that is designated by the Secretary of State under the Address Confidentiality Program and that is used instead of an actual address. This is also known as a participant's legal address of record. This address is 1901 W. Madison Street, Apt. #XXX, Phoenix, AZ 85009-XXXX. All program participants have distinct Apartment Numbers.

V. POLICY

- A. It is the responsibility of ACP participants to inform DCS employees of their participation in the program by providing a current and valid ACP card.

- B. Once participation in the ACP is verified by the Secretary of State, the Department shall use the substitute address in lieu of the actual address, unless the participant voluntarily provides DCS their actual address.
- C. The actual address of an ACP participant may be disclosed to the ACP liaison(s) by the Secretary of State for non-emergency situations. Actual addresses may not be used after the expiration date set by the Secretary of State at the time of disclosure, or for any other purpose not outlined in the request. Any record of the actual address must be destroyed at the time of the expiration.
- D. Actual addresses shall be protected from disclosure, and they must not be stored or included in any correspondence. DCS must redact the actual address (excluding phone number) of an ACP participant from any records that were created up to 90 days prior to the date that the program participant applied to be certified in the program. The date that the program participant applied to be certified in the program is reflected on the authorization card as date of issue (DOI).
- E. DCS employees seeking disclosure of the participant's actual address shall comply with the ACP actual address disclosure request procedure. DCS employees may not ask a client for their actual address once an ACP participant presents a current and valid ACP authorization card. The DCS employees shall ask the ACP participant to provide the Apartment Number associated with the substitute address, as the Apartment Number is a unique identifier for each ACP participant and is not confidential.

EXCEPTIONS:

- 1. If an ACP participant voluntarily provides the actual address or requests that the Department uses the actual address in lieu of the substitute address, the DCS employee may obtain and utilize the actual address voluntarily provided by the ACP participant. The actual address obtained from the ACP participant shall be protected from disclosure and it must not be stored or included in any correspondence.
 - 2. If the Department receives the actual address from a third party, the Department may utilize the actual address until the ACP participant informs the Department of their participation in the program by providing a current and valid ACP card.
- F. Phone numbers may be excluded from redaction and used to contact ACP participants, but may not be shared outside the organization.

- G. If any participant (parent, guardian, custodian, child, etc.) becomes actively enrolled into a referral program, the DCS employee making the service referral shall ensure that the contracted service provider is aware of the client's participation in the ACP program.
- H. The DCS employee working with a verified ACP participant shall ensure confidentiality of records.

VI. PROCEDURES

- A. It is the responsibility of the ACP participant to inform DCS employees of their participation in the program and request DCS to use the program participant's substitute address. Once the participant informs the DCS employee and provides a current and valid ACP authorization card, the DCS employee shall no longer request disclosure of the participant's actual address, unless the participant voluntarily provides DCS their actual address.
- B. Roles and Responsibilities
 - 1. DCS Intake Specialists are responsible for:
 - a. utilizing the address provided by the source at the time of report;
 - b. requesting the source to provide the Apartment Number when an ACP substitute address is presented at the time of report. If unknown, the substitute address shall be used without the Apartment Number and "Address Confidentiality Program" be selected as the "Address Type";
 - c. utilizing the "Address Confidentiality Program" Address Type only in conjunction with the substitute address; and
 - d. not updating the address of an ACP participant if the Person's Record in Guardian identifies the client as a verified ACP participant, except to update the Apartment Number of a substitute address.
 - 2. DCS Investigators and Case Specialists are responsible for:
 - a. reporting to AMS when a participant presents a valid address ACP authorization card, except when the Person Record in Guardian already identifies the client as a verified active ACP participant;

- b. contacting the ACP participant telephonically to obtain the Apartment Number associated with the substitute address, if not obtained previously;
- c. utilizing the “Address Confidentiality Program” Address Type in Guardian only in conjunction with the substitute address;
- d. submitting an address disclosure request to AMS to obtain the actual address disclosure, if needed for investigative or case management duties. The Apartment Number must be included with the request;
- e. ensuring the address of an ACP participant is not updated if the Person’s Record in Guardian identifies the client as a verified active ACP participant, except to update the Apartment Number of a substitute address;
- f. redacting or destroying any actual address information that is not the substitute address from hard file case records and safeguard it from unauthorized entities. It is the responsibility of the DCS employee to review all records before dissemination of those records occurs to ensure the actual address and telephone number do not appear anywhere inadvertently;
- g. ensuring the actual address is not used after the expiration date set by the Secretary of State at the time of disclosure or for any other purpose not outlined in the request, and securely disposing of any record of the actual address at the time of the expiration;
- h. not disclosing the actual address to anyone (internal or external); including law enforcement, JPO, DPS, the A.G.'s Office, etc.;
- i. ensuring that the contracted service provider is aware of the client’s participation in the ACP program when an active ACP participant becomes actively enrolled into a service referral program; and
- j. ensuring that the service referral shall include the substitute address as the address of record and telephone number shall not be included.

3. CRCU is responsible for:

- a. redacting all addresses that are not the substitute address and telephone numbers when releasing Department's records, when the Person's Record in Guardian identifies the client as a verified active ACP participant;
 - b. redacting any records that were created up to 90 days prior to the date that the program participant applied to be certified in the program. The date that the program participant applied to be certified in the program is reflected on the authorization card as date of issue (DOI), and in Guardian as the "Address Start Date"; and
 - c. contacting AMS when uncertain about an individual's ACP participation status.
4. Service Providers are responsible for:
- a. submitting an address disclosure request to AMS to obtain the actual address or telephone number disclosure. The Apartment Number must be included with the request;
 - b. not using the actual addresses after the expiration date set by the Secretary of State at the time of disclosure or for any other purpose not outlined in the request, and securely disposing of any record of the actual address at the time of the expiration; and
 - c. not divulging the actual address to anyone (internal or external); including law enforcement, JPO, DPS, the A.G.'s Office, etc.
5. AMS is responsible for:
- a. working with the Secretary of State to verify ACP participation;
 - b. updating the address and telephone number of an active verified ACP participant in the Person's Record in Guardian to reflect ACP participation;
 - c. working with the Secretary of State to obtain the disclosure of the actual address when requested by DCS employees;
 - d. maintaining records of verified active ACP participants; and
 - e. performing an annual review to ensure that the Department

maintains the substitute address as the address of record for active verified ACP participants.

6. Active ACP participants are responsible for properly identifying themselves as active ACP participants by providing a current and valid ACP authorization card.
7. All other DCS employees are responsible for:
 - a. reporting to AMS when a client presents a valid ACP authorization card, except when the Person Record in Guardian already identifies the client as a verified active ACP participant;
 - b. utilizing the “Address Confidentiality Program” Address Type only in conjunction with the substitute address; and
 - c. not updating the address of an ACP participant if the Person’s Record in Guardian identifies the client as a verified active ACP participant, except to update the Apartment Number of a substitute address.

C. Verification of ACP Enrollment

The DCS employee verifies the client's current participation in the ACP by completing the following steps:

Step 1: The DCS employee contacts AMS requesting verification of a client's current participation in ACP.

E-mail: privacy@azdcs.gov (preferred method)

Phone: 602-255- 2615

Fax: 833-833-8461

The ACP verification request contains the following information:

- Full Name;
- Date of Birth;
- Guardian’s PI number;
- Guardian’s Intake (IN), assessment (AS) or case (CS) number; and
- ACP substitute address with Apartment Number.

The Apartment Number is the unique identifier for the client, and must be included. The Secretary of State will not verify ACP Participation without the Apartment Number. If Apartment Number is unknown, the DCS employee must contact the client telephonically to obtain the Apartment Number (Also see VI.B.6).

Step 2: AMS works with the Secretary of State to verify ACP participation and obtain ACP authorization cards for verified active ACP participants.

Step 3: AMS responds with verification of the client's current ACP participation.

- When a client is verified to be an active ACP participant, AMS will update the DCS employee who requested the verification.
- When the Secretary of State is unable to confirm that a client is an active ACP participant, the DCS employee informs the client and provides the Secretary of State's phone number 602-542-1653, if they wish to dispute the resolution. No further protection is required if participation is not verified and the client will be required to provide their address, unless they wish to make a dispute with the Secretary of State.

Step 4: When a client is verified to be an active ACP participant, AMS will update Guardian's Address Directory, Address Type, Address Start Date, Phone Type, and updates Validation status to "Confirmed." AMS will also enter an end date for all other addresses that are not the substitute address.

D. Requesting Disclosure of Actual Address

Disclosure of the actual address is required only if in-person contact with a verified active ACP participant will occur at the ACP participant's **actual address**. A request for disclosure is not required if contact occurs outside the ACP participant's actual address.

When a DCS employee requires disclosure of an ACP participant's actual address, the DCS employee works with AMS to obtain the actual address.

Step 1: The DCS employee completes the [DCS-1248A ACP Non-Emergency Address Disclosure Request](#) form and obtains the signature of their direct supervisor prior to submitting the request to AMS. Only the DCS employee assigned to work directly with the active ACP participant and direct supervisor shall request the disclosure of the actual address. A DCS employee asked to assist

but not assigned to work directly with the active ACP participant must be included in the disclosure request if assistance is required at the active ACP participant's actual address.

At the time of the request, if the direct supervisor is unavailable to sign the DCS-1248A ACP Non-Emergency Address Disclosure Request, a different supervisor may sign the request on behalf of the DCS's employee direct supervisor, or one of the Department's ACP liaisons (see Definitions) will sign the request on behalf of the DCS's employee direct supervisor. Even so, the DCS's employee direct supervisor must be named as the "Requestor supervisor" on the request.

The Apartment Number must be included in the request. If unknown, the DCS employee must contact the client telephonically to obtain the Apartment Number (Also see VI.B.6).

The completed and signed DCS-1248A ACP Non-Emergency Address Disclosure Request shall be submitted to AMS.

E-mail: privacy@azdcs.gov (preferred method)

Faxed: 833-833-846.

Step 2: AMS verifies that the client is an active ACP participant either by reviewing the list of verified active ACP participants it maintains, or following VI.C. Step 2.

Step 3: If the client is confirmed to be an active ACP participant, AMS will email the completed DCS-1248A ACP Non-Emergency Request form to the Secretary of State. The request may take up to ten business days to be processed from the time AMS submits the request to the Secretary of State.

Step 4: AMS provides the requested information to the DCS employee telephonically.

- AMS will communicate telephonically ACP participant's actual address and the parameters for using the ACP participant's actual address; for example, time limitations.
- AMS will send a follow-up email documenting the parameters for using the ACP participant's actual address. The email will not include the actual address.

- AMS can only disclose the information to the requestor and supervisor identified on the form. If the actual address is needed by another DCS employee (i.e. transfer from investigation to ongoing or to another case specialist), the employee and their supervisor shall submit a new request for disclosure.
- The requestor uses the actual address only for the purposed time frame specified on the request. After disclosure of actual address expires, the requestor will securely dispose of any record of the actual address.
- The requestor does not divulge the actual address to anyone (internal or external); including law enforcement, JPO, DPS, the A.G.'s Office, etc..
- The requestor does not enter the actual address into any system, or record the actual address on any hard copy record. The document containing the actual address shall not include complete personal identifiers; such as, the ACP participant's full name.

VII. FORMS INDEX

[DCS 1248A Non-Emergency Address Disclosure Request](#)