



TITLE	POLICY NUMBER	
Address Confidentiality Program	DCS 07-12	
RESPONSIBLE AREA	EFFECTIVE DATE	REVISION
Audit Management Services	05/20/2019	2

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.

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
- [A.R.S § 41-165](#) Disclosure of actual address prohibited; violation; classification

A.R.S § 41-166	Address use by state or local government entities
A.R.S § 41-167	Request for disclosure
A.R.S § 41-168	Nondisclosure of address in court proceedings

IV. DEFINITIONS

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.

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.

Address Confidentiality Program 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.

Audit Management Services: The team assigned to manage privacy.

Case Record Coordination Unit (CRCU): The DCS unit responsible for providing redacted DCS records to individuals who request them in a manner that complies with DCS policy and applicable law.

Date of issuance/date of certification: The date that the program participant applied to be certified in the program.

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.

Expedited Disclosure: A request for disclosure of an ACP participant's actual address for use by a court, clerk of the court, criminal justice official, criminal justice agency, or

probation department.

Leadership Team: Senior Leadership Team direct reports, 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.

Program participant: An individual accepted into and currently participating in the Address Confidentiality Program.

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. It 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 address is 1901 W. Madison Street, Apt. #XXX, Phoenix, AZ 85009-XXXX. All program participants have distinct apartment numbers.

V. POLICY

- A. Upon the request of the ACP participant, the substitute address (see "Definitions") shall be used in lieu of actual address when creating any record once the ACP participant verbalizes or provides a current, valid ACP card or participation is confirmed. It is the responsibility of ACP participants to make DCS employees aware of their participation in the program.

- B. If a DCS employee becomes aware of an ACP participant's involvement in the program, they must report it to Audit Management Services (AMS) within one business day.
- C. The actual address of an ACP participant shall be protected from disclosure or redacted from any DCS record created up to 90 days prior to the date of issuance of the ACP authorization card.
 - 1. Actual addresses may be disclosed to the DCS Address Confidentiality Program liaison by the Secretary of State (SOS) for emergency and non-emergency situations. Non-emergency disclosures are the only approved process with the SOS but in certain situations (e.g., Priority 1 Report) they will also grant emergency disclosures. In either instance (emergency or non-emergency) the actual address must not be stored, disclosed, or included in any correspondence.
 - 2. Actual addresses may not be used after the expiration date set by the SOS 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. 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 has made them aware of their participation in the program, nor may they use the address if it was obtained previously.
- E. 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 ACP enrollment date. The enrollment date is reflected on the authorization card as date of issue (DOI).
- F. Phone numbers may be excluded from redaction and used to contact ACP participants, but may not be shared outside the organization.
- G. If the 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.
 - 1. Addresses may not be disclosed to service providers if the client is actively enrolled as a participant in the ACP.

2. Service providers will follow the steps located in the Requesting Disclosure section of Procedures in order to disclose the actual address or phone number.
 3. Actual address information must be redacted from any documents leaving the Department.
- H. The DCS employee working with a verified ACP participant ensures confidentiality of records.
1. The verified ACP participant's substitute address should not be updated or changed in Guardian until the person is no longer an ACP participant.
 2. It is the responsibility of the DCS employee to review all records before dissemination of those records occurs to ensure the actual address does not appear anywhere inadvertently.
 3. The DCS employee does not divulge the actual address to anyone; this includes law enforcement, JPO, DPS, or the A.G.'s Office.

VI. PROCEDURES

It is the responsibility of the ACP participant to request DCS to use the program participant's substitute address. Once the participant verbalizes or provides a current and valid address confidentiality authorization card, DCS employees shall no longer request disclosure of the participant's actual address.

A. Roles and Responsibilities

1. DCS employees are responsible for:
 - a. reporting to AMS when a client discloses that they are an active ACP participant or when they learn that the client has a substitute address;
 - b. working with AMS to maintain contact with the client; and
 - c. redacting or destroying any phone number or actual address information that is not the substitute address from hard file case records and safeguarding it from unauthorized entities.
2. AMS is responsible for:

- a. working with the SOS to verify ACP participation;
 - b. entering and managing addresses and phone numbers for ACP participants in the Demographic tab of a Person record in Guardian.
 - c. enabling High Profile status on case records; and
 - d. delivering ACP information to DCS employees upon request for a client in the program.
3. CRCU is responsible for redacting all addresses from the electronic case record that are not the substitute address when a client discloses their participation in ACP.

B. 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
Faxed: upon request.

The ACP verification request contains the following information:

- full name;
- date of birth;
- Guardian case identification number; and
- ACP substitute address with apartment number.

The apartment number is the unique identifier for the client, and must be included. The SOS will not verify ACP Participation without the Apartment Number.

Step 2: AMS responds with verification or negation of the client's current ACP Participation.

- When current ACP participation is verified, AMS requests the DCS employee redact address information, other than the substitute address from Guardian, for the ACP participant and any other case participant who has the actual address listed of the ACP participant.
- When AMS does not have access to a DCS system (e.g., Quick Connect, DCS CHP), AMS notifies the unit with access and that unit must redact the information.
- When current ACP participation is not verified, the DCS employee informs the client. No further protection is required if participation is not verified.

Step 3: After ACP participation is verified, AMS will end date the current address in Guardian and will create the new address with the apartment number of the substitute address in the demographic screen of the Person record in Guardian. The substitute address should not be end dated by anyone but AMS.

Step 4: The case will be put on high profile status. AMS will email the Deputy Director of Field Operations and the Child Abuse Hotline Administrator. Once the case is high profile, only the case manager and designated users may review the cases.

C. Requesting Disclosure of Actual Address

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

Step 1: The DCS employee provides AMS with the ACP participant's name and address, with apartment number.

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

Phone: 602-255-2615

Faxed: upon request.

Step 2: The DCS employee receives verification from AMS of the ACP participant's current participation in ACP.

Step 3: The DCS employee completes the DCS 1248A ACP Non-Emergency Request form (see Forms Index below) and forwards it to AMS.

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

Phone: 602-255-2615;

Faxed: upon request.

Step 4: AMS will email the completed DCS 1248A ACP Non-Emergency Request form to the SOS. Request may take up to seven days to be processed from the time AMS submits the request to the SOS.

Step 5: AMS provides the requested information to the DCS employee telephonically.

- AMS will communicate telephonically the ACP participant's actual address and the parameters (e.g., time limitations) for using the participant's actual address.
- 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.
- The disclosure of the actual address is specific to the requestor and the supervisor. If the actual address is needed by another DCS employee (e.g., 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 time period specified on the request.
- The requestor does not divulge the actual address to anyone, including law enforcement, JPO, DPS, or the A.G.'s Office.
- The requestor does not enter the actual address into any system, or record the actual address on any hard copy record.

VII. FORMS INDEX

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