

Assistance for Victims of Trafficking

Pursuant to the Fair Credit Reporting Act (FCRA) and regulations promulgated by the Consumer Financial Protection Bureau (CFPB), victims of trafficking can now seek to have adverse information that resulted from trafficking blocked from consumer reports about them. IHA Human Capital Services, Inc. (“IHA HCS”) offers Verified Services and is committed to assisting those who are victims of trafficking in compliance with applicable law. Please follow the instructions below to have adverse information that resulted from trafficking blocked from your consumer report.

Who Is Covered By The Trafficking Law?

The information on this webpage applies to “victims of trafficking.” “Victims of trafficking” are those individuals who were subject to:

1. “Severe forms of trafficking in persons.” This is defined as sex trafficking in which a commercial sex act is induced by force, fraud, or coercion in which the person induced to perform such act is less than 18 years old or the recruitment, harboring, transportation, provision, *or* obtaining of a person for labor/services through the use of force, fraud, or coercion for the purposes of involuntary servitude, slavery, peonage, or debt bondage; or
2. “Sex trafficking.” This is defined as the recruitment, harboring, transportation, provision, obtaining patronizing or soliciting of a person for the purpose of a commercial sex act.

How to Request a Block of Information in Your Consumer Report

You must submit the following information/documentation to IHA HCS in order to request a block of information in a consumer report prepared about you: (1) appropriate proof of identity; (2) victim determination documentation; (3) identified adverse items of information; and (4) your preferred contact method. Each of these is discussed in more detail below.

1. Appropriate Proof of Identity.

Victims of trafficking must submit appropriate proof of their identity to IHA HCS. This typically includes providing IHA HCS with a copy of your:

- a) Driver’s license;
- b) State identification card;
- c) Passport;
- d) Social Security Card;
- e) Utility or service bills; or
- f) Other government-issued identification card.

If you are a victim of trafficking and do not have any of the forms of identification listed above, please contact IHA HCS at 630-276-5400 or Verified@team-ihc.org so that your identity can be confirmed by another method.

2. Victim Determination Documentation.

Victims of trafficking are required to provide victim determination documentation to IHA HCS. To do so, you may provide any of the following:

Option #1: Documentation that establishes that one of the following entities has formally determined that you are a victim of trafficking:

- a. A Federal, State, or Tribal governmental entity.
- b. A non-governmental organization or member of a human trafficking task force, including victim service providers affiliated with these entities and authorized by a Federal, State, or Tribal government entity.

Option #2: Documentation that you are a victim of trafficking, which has been made by a court of competent jurisdiction or a determination consisting of documents filed in a court of competent jurisdiction where a central issue in the case is whether you are a victim of trafficking and the court has, at a minimum, affirmed your claim either by accepting certain pieces of evidence which are assumed to be true or finding that there is no genuine dispute as to any material fact supporting a judgment in favor of you as a matter of law.

Option #3: A signed self-attestation attesting that you are a victim of trafficking, if the self-attestation or accompanying document is signed by:

- a. A Federal, State, or Tribal governmental entity;
- b. A non-governmental organization or member of a human trafficking task force; or
- c. A court of competent jurisdiction.

3. Identified Adverse Items of Information

Victims of trafficking are required to identify any item(s) of adverse information (e.g., arrest records, criminal convictions, civil judgments, etc.) that they believe should not be included in a consumer report about them because the item(s) resulted from a severe form of trafficking in persons or sex trafficking of which they are a victim. Please make sure to provide this information to us.

4. Preferred Contact Method.

Victims of trafficking must provide IHA HCS with their preferred contact method (e.g., mail or email).

How To Submit Documentation To IHA HCS

You can submit the above-referenced information and documentation via mail at the addresses listed below:

By mail:

1. IHA HCS, P.O. Box 3015, Naperville, IL 60566 or

2. IHA HCS, 1120 E. Diehl Road, Suite 200, Naperville, IL 60563

Information Blocking Process

Once IHA HCS receives your complete submission, we will create a preliminary block on the adverse information within four business days of your request. This means that IHA HCS will not report the adverse items of information you identified while the preliminary block is in place. If IHA HCS needs additional information to process your request, we will contact you within five business days of your submission.

IHA HCS will make a final determination within 25 business days of receipt of your submission. We will notify you of our final determination within five business days of us making the final determination.

Questions

If you have questions regarding the process or the status of your request, please contact IHA HCS at 630-276-5400 or Verified@team-iha.org.