

North Carolina Infant-Toddler Program Procedural Guidance

Reference: Procedural Safeguards Policy

Address Confidentiality Program

Introduction

The Address Confidentiality Program, or ACP, is a statutorily authorized mail forwarding program established under N.C.G.S. § 15C, to assist victims of domestic violence, sexual assault, stalking, and human trafficking keep their address out of the public record. State agencies may ask an applicant, who is a participant in the ACP, to provide a residential address for their services, however, the state agency is required to keep the residential address out of the public record. The state agency must use the substitute address provided by the ACP when communicating with the applicant or releasing public records.

Procedures

1. The Parent/guardian participating in the ACP is responsible for notifying the North Carolina Infant-Toddler Program (NC ITP) of their enrollment by presenting the ACP card to the NC ITP/Early Intervention Service Coordinator (EISC). The EISC is to document in a progress note that card was presented, and the confidential address field is to be used in HIS to record the family's physical address.
2. When registering a child in HIS or updating client data for a child already enrolled in the NC ITP: The ACP substitute address is to be entered into the mailing address fields. The family's physical address must be entered into the Confidential Address fields at the bottom of the screen.

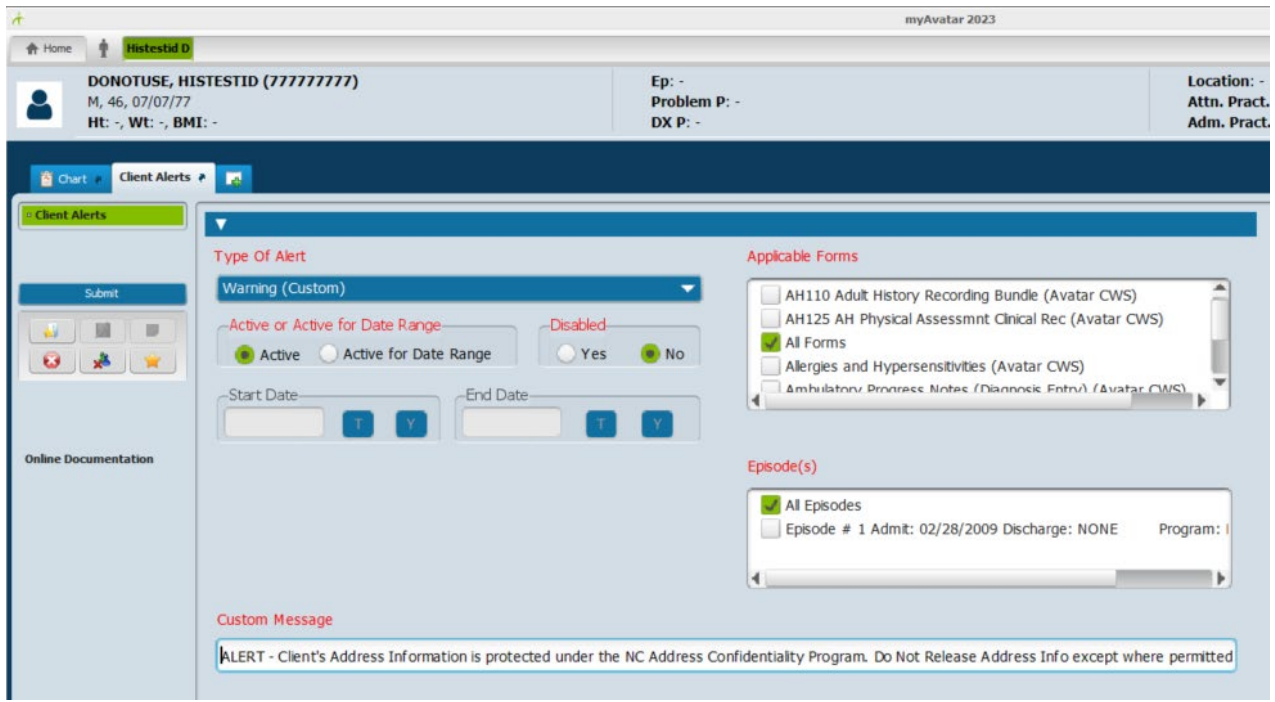
The screenshot displays the 'Update Client Data' form in the HIS system. The form is titled 'Update Client Data' and includes a 'Client Update' section. The form is divided into two main columns of address fields. The left column contains 'Client's Mailing Address' fields, and the right column contains 'Client's Confidential Address' fields. The 'Client's Mailing Address' fields include: 'Client's Mailing Address - State' (dropdown menu set to 'NORTH CAROLINA'), 'Client's Mailing Address - Street' (text input field with '9099 MAIL SERVICE CENTER'), 'Client's Mailing Address - Street 2' (text input field), 'Client's Mailing Address - Zipcode' (text input field with '27699-9099'), and 'Client's Mailing Address - City' (text input field with 'RALEIGH'). The 'Client's Confidential Address' fields include: 'Client's Confidential Address - Street' (text input field with '1234 MADEUP ROAD'), 'Client's Confidential Address - Street 2' (text input field with 'APT 123'), 'Client's Confidential Address - Zipcode' (text input field with '27713-1718'), 'Client's Confidential Address - City' (text input field with 'DURHAM'), and 'Client's Confidential Address - State' (dropdown menu set to 'NORTH CAROLINA'). The form also includes a 'DONOTUSE' field at the top, an 'SSI Indicator' section with 'Yes' and 'No' radio buttons, and a 'Grade Level' dropdown menu. A 'Submit' button is located on the left side of the form.

The physical address fields (Address – Street, Apartment or Unit, Zip Code, and City) are to be left blank. The county field must be listed in HIS as the county that the child resides in, not the county of the ACP substitute address.

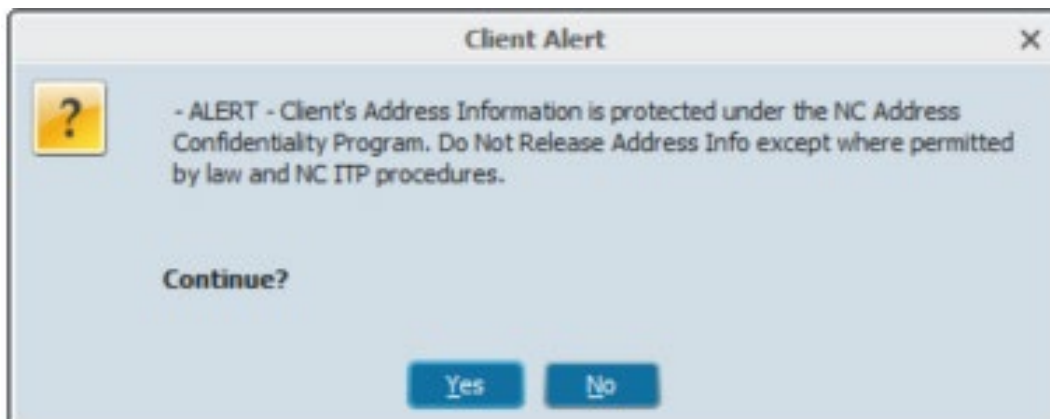
Once the address fields have been entered in HIS, an alert must be added in HIS to alert staff when they access the child’s record that the child’s address is protected under the Address Confidentiality Program. This is done through the Client Alerts screen in HIS. This screen can be accessed by entering “Client Alerts” in the search box under “Search Forms” on the HIS main screen.

In the Client Alerts screen, under Type of Alert, select Warning (Custom) from the dropdown. Under Applicable Forms, select All Forms. Under Episodes, select All Episodes. Under Custom Message enter the following text:

ALERT - Client's Address Information is protected under the NC Address Confidentiality Program. Do Not Release Address Info except where permitted by law and NC ITP procedures.



After submitting the information on the Client Alerts screen, the following popup should appear whenever staff access the child’s record in HIS:



3. The family’s physical address will be listed on the Child Find notification report sent to the Local Education Agency (LEA). All other NC ITP forms, including patient pay invoices, Assistive Technology (AT) no contact letters, etc., will list the substitute address given by the ACP. For the meeting invitation, “contact SC to receive physical address” should be written on the address line.
4. Children’s Developmental Services Agency’s (CDSA) utilizing provider email blasts, individual email, and/or fax for identifying potentially available providers must call the provider to verbally give out the physical address and explain that the family is enrolled in the ACP and the substitute ACP address is the only address to be listed on their forms.
5. When a record for a child is transferred to another CDSA, whether the child is enrolled or still in the referral process, call the record transfer contact and explain that the family is enrolled in the ACP and that all forms will have the substitute address listed. A password protected and encrypted email with the family’s actual address must be sent to the receiving CDSA.

6. To accommodate the forwarding of mail, an additional five (5) days must be added when mailing letters, Prior Written Notice (PWN), and other NC ITP forms that require the family to exercise their rights. For example, instead of the standard 10 days to respond to PWNs, the family would now have 15 days.
7. The EISC or CDSA designee must place a note in the front of the paper chart with the following wording from the Division of Child and Family Well-Being (DCFV) legal department:
Pursuant to Chapter 15C of the North Carolina General Statutes, no employee of a CDSA shall knowingly and intentionally disclose an Address Confidentiality Program participant's actual address or telephone number unless permissible by law. Questions of whether a particular disclosure is permissible should be addressed to legal counsel.
8. If a currently enrolled child enters the ACP following enrollment, documents in the file prior to that date do not need to be redacted, but the address does need to be kept confidential. Follow the HIS data entry steps listed above to update the address fields in HIS.

Link to legislation –

https://ncleg.gov/EnactedLegislation/Statutes/HTML/ByChapter/Chapter_15C.html