Credit Builders ALLIANCE

Guidance for CBA Access Members

Sharing Credit Reports while Working Remotely

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General Security Protocol Best Practices

Organizations should have high quality security protection in place regardless of whether staff are working in an office setting or remotely. These security protections may look different for remote settings, but in either case, at a minimum, policies, standards and guidelines should consider how to:

- ✓ protect the information resources of the organizations.
- ✓ mitigate the risks associated with accidental or deliberate mishaps from both internal and external sources by limiting access to networks and systems to authorized staff.
- ✓ provide direction to those responsible for the design, implementation, and maintenance of information and network systems in support of the organization's mission.
- ✓ promote security awareness and accountability for use and management of IT resources and any sensitive data.
- ✓ comply with end-user agreements in place with third-party agencies that allow you to access sensitive consumer data.
- ✓ establish a basis for routine and periodic audits, reviews, and assessments.

Disclaimer:

This guidance document is not intended to provide legal advice and may not be used as legal advice. Every effort has been made to assure this information is up to date. However, it is not intended to be a full and exhaustive explanation of contractual obligations or the law in any area, nor should it be used to replace the advice of your own legal counsel.

Protecting Credit Report Information

CBA recommends that your organization provide staff working remotely with all the tools necessary to effectively maintain the highest standards of data security. This may include access to a VPN (Virtual Private Network), locking file cabinet, privacy screen, and shredder.

The following are **key security protocols** that everyone should have in place:

- ✓ Always require password protection to access your computer.
- ✓ Limit the amount of time you transport your computer outside of your remote location, and never leave it unattended in a vehicle.

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Protecting Credit Report Information

Key Security Protocols, cont.

- ✓ Lock your computer every time you walk away from it and/or set it to time out when activity isn't detected—even if for a minute.
- ✓ Avoid working with paper documents while remote. If it is necessary, keep the documents in a locked filing cabinet in your remote location.
- ✓ Shred sensitive information (like personal protected information such as social security numbers) immediately whether in printed form or electronically.
- ! Do not save credit reports electronically on your desktop, mobile phone or tablet, or outside of your organization's secure server/filing record keeping system (i.e. Dropbox, Salesforce, etc.)
- ! Do not send credit reports to your clients over unencrypted email.

Accessing Credit Reports

If your organization, in compliance with your end-user agreements with the credit bureaus, determines that you are able to access credit reports remotely, remember the following:

- ✓ Pull credit reports in a dedicated, private room of your remote location only and not around others, including household members. You may wish to use a privacy screen to ensure confidentiality.
- ✓ Use a secure server to pull credit reports, ideally using a secure VPN made available by your employer.
- ✓ Offer clients a secure way to provide you with their written authorization to pull their credit reports. Different options may include:
  - Set up secure workspaces to which clients can send or upload documents such as Dropbox, ShareFile, etc.
  - Send a secure link via a secure email program that clients can use to send back a secure email with the document attached securely.
  - Use an e-signature platform such as DocuSign for clients to sign and in which they can enter sensitive information that will be encrypted during transmission.
- ! Never pull reports in public or using public WIFI (example: McDonalds, Starbucks, a library, a coworking space, at a friend's home, etc.).

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Sharing Credit Reports Remotely

Remote coaching/counseling may be necessary or preferred in certain circumstances. Below are tips for sharing credit reports outside of an in-person session with clients.

- Sessions may be conducted by telephone or if feasible, through online video/screen sharing platforms in a confidential space
  - If meeting via phone, verbalize the key information on your client's credit report and have them take notes on what action steps they may need to take next. Remember to prompt them to ask questions and pause to listen to their concerns. Alert them when you may not be speaking because you too are taking notes.
  - When conducting remote sessions using an online screen sharing platform, don't turn on the screen sharing function until you are ready to start sharing that client's report with them. Be sure to close out of any other documents that may include sensitive data about other clients or any other information, like case notes, that you do not want clients to inadvertently see. Go through the credit report as thoroughly as you would in-person.

! Do not conduct virtual coaching/ counseling sessions in public or around household members. No one should be able to hear your phone conversations or see the information you may be sharing onscreen. If your space does not allow for privacy, these conversations should be postponed until these privacy requirements can be met.

Ensure confidentiality: no one should be able to hear your phone conversations or see the information you may be sharing onscreen.

*If meeting via phone and your organization does not have the ability to forward your office line to your cell or home phone, your organization may wish to consider signing up for remote phone number access through Ring Central or Google Voice so that employees personal phone numbers are protected.

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Sharing Credit Reports Remotely, cont.

- Encourage your clients to find a space to participate at their location that is also private.
- Ensure that you are disclosing credit reports and scores in compliance with your end-user agreements. If you are purchasing FICO® Scores, ensure that you are participating in the FICO® Open Access for Credit and Financial Counseling program and using the appropriate disclosures. (Consult CBA Guidance docs on Sharing Credit Report information for more details).
- Consider mailing the client a copy of their credit report, but no do not send over unencrypted email. During your session, collect notes or use coaching worksheets to document key pieces of information and action items that you can share with your client, without including any sensitive information.

! Do not pull credit reports from www.annualcreditreport.com or pull credit information from sites like Credit Karma on behalf of your clients. Instead, guide them through the process of requesting that information on their own.

Visit CBA's Learning Library for more tip sheets, tools, and resources on a variety of Credit Building topics!

cbatraininginstitute.org

General Tips for conducting remote counseling/coaching

As a trusted financial coach, it is important to continue to build relationships with clients, which may be harder to do remotely than in person. Some tips for achieving that include, but are not limited to:

- Brush up on skills such as empathetic listening and trauma informed care.
- Set expectations upfront for the call. Given circumstances, notify your client that there may be period of brief silence, particularly if the session is conducted by phone only, should you need to enter information into documents or take specific notes. Get their buy-in to proceed.
- Allow your client to lead the initial conversation, as their goals may have changed since the last time you connected.
- Discuss possible resources or information that your client may have questions on or wish to pursue.