the credit check requirement for youth in foster care

Q&A ON IMPLEMENTATION

FEBRUARY 2015

The credit check requirement is an important step to ensure that young people leave foster care with clear credit to increase their odds of achieving financial stability. Yet states, counties, tribes and credit reporting agencies (CRAs) have faced numerous challenges to implementation that continue to stymie efforts to be fully compliant. These challenges include, but are not limited to:

- Contracting provisions that states, counties, and tribes may have difficulty meeting, such as provisions governing information system requirements, confidentiality assurances, and permissible uses for the reports;
- Need for training and lack of capacity among frontline staff and administrators alike about credit issues, how to dispute credit problems, how to work with the CRAs, how to engage partners, etc. Additionally, CRAs lack understanding of how child welfare agencies work and the unique issues facing youth transitioning from foster care;
- Lack of robust partnerships between child welfare agencies and community-based nonprofit institutions that may be able to not only help with implementation of the credit check mandate but may also serve as excellent resources for youth as they age out of foster care;
- Complexities of dealing with all three CRAs, which has created numerous lag times given the differing contacts, procedures, requirements, and offerings of the CRAs; and
- Changes in federal law, specifically recent legislation lowering the age to 14, which requires agencies and tribes to make changes to how they are currently conducting their credit checks—including possible revisions to existing contracts with the CRAs and some state laws.

Despite these challenges, state and local agencies are moving forward incrementally and, along the way, are identifying credit problems that are being addressed. We hope this guide can serve as a resource for those who are new to the issue or are still struggling to fully implement the requirement so that no young person leaves foster care with unidentified credit issues.

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Q&A ON IMPLEMENTATION OF THE CREDIT CHECK REQUIREMENT

1. BACKGROUND

A. What is the credit check requirement?

The credit check requirement is a provision in federal law[1] enacted in 2011 that requires public child welfare agencies to provide credit reports to youth in foster care at age 16 and up and address any inaccuracies found in their reports. More recent legislation enacted in 2014 lowered the age to 14[2], and the U.S. Department of Health and Human Services (HHS) is developing a program instruction to guide implementation by September 2015. The credit check requirement also applies to young people in foster care beyond their 18th birthday.

B. Why did Congress pass the credit check requirement?

The requirement to check the credit of youth in foster care responds to stories from young people who transitioned from foster care with credit that had been compromised due to identity theft or credit errors. Some of these stories suggest that their credit was compromised while in care, while other credit problems occurred before they entered care. Regardless, young people have reported difficulty renting an apartment, getting a job, or obtaining a student loan due to these credit issues. Policymakers wanted to ensure that young people who leave foster care do not have to face any negative consequences of credit problems on their own and can start their adult lives with a clean credit slate.

1 The Child and Family Services Improvement Act, P.L. 112-34.

2 The Preventing Sex Trafficking and Strengthening Families Act, P.L. 113-34.

C. How many children does this requirement impact?

There is no national data on the incidence of identity theft or credit problems for youth in and transitioning from foster care. One pilot in Los Angeles found that about 5% (104 out of 2,110) of 16 year olds in the pilot had credit issues. In a recent survey conducted by ChildFocus and Credit Builders Alliance[3], 5% of respondents estimated that evidence of ID theft existed on the credit reports they obtained for 10% or more of the young people they serve, and 60% estimated that ID theft or errors existed on in 1-9% of the credit reports. Even at the conservative estimate of 5%, this would amount to 2,700 16- and 17-year-olds in foster care in 2012. As required under the new law, 5% of the young people between the ages of 14 and 17 who are in foster care would amount to almost 4,800 children, while 5% of the young people in foster care up to age 21 would impact almost 5,700 children.

2. FEDERAL GUIDANCE

A. What guidance has HHS issued about the credit check requirement?

HHS has issued two program instructions and two information memoranda related to the credit check requirement.

- **CB-PI-11-09** required states to submit a plan amendment by January 31, 2012, for how to comply with the new provision.

*3 The ChildFocus and Credit Builders Alliance survey was sent to the Credit Check Learning Community, a peer network of state and local child welfare agencies across the country. Results of the survey can be found at **childfocuspartners.com***

- **ACYF-CB-IM-12-02** extended the deadline for the state plan amendment to August 13, 2012. The reason for the extension was to give HHS more time to provide more information on the process for checking credit for minors given that the use of the government-sanctioned annualcreditreport.com site is only available to individuals 18 and older.
- **ACYF-CB-PI-12-07** provides additional information on how to comply with the provision and requires child welfare agencies to obtain credit reports for minors from all three credit reporting agencies.
- **ACYF-IM-14-03** outlines case plan requirements for youth 14 and older, including the requirement to provide a copy of an annual credit report and address any inaccuracies found in the report.
- HHS issued **a letter** to state child welfare directors on December 5, 2014, encouraging them to do more frequent credit checks for youth in foster care, to consider checking the credit for all young people in foster care and to explore the use of credit freezes and fraud alerts for those young people for whom identity theft or other credit issues are identified.

B. Why do the federal regulations require child welfare agencies and tribes to request reports from all three credit reporting agencies?

Credit reporting agencies (CRAs) are companies that collect, store, analyze, summarize and sell credit-related information on individuals and firms for a fee. Under federal law, adults 18 and older can obtain one free credit report per year from each of the three largest CRAs—Equifax, Experian and TransUnion—through AnnualCreportReport.com, the only government-sanctioned site for consumers to access their free credit reports. Unfortunately, minors cannot use annualcreditreport.com to access their reports because, as minors, they are not legally able to enter into contracts in most states, and therefore should not have a credit report.

Not all businesses or creditors report to each of the three CRAs, which means that obtaining a report from one of the CRAs does not guarantee that all possible credit issues have been identified. Therefore, obtaining reports from all three CRAs is the best way to ensure any credit problems are identified before young people leave foster care. This means that child welfare agencies that want to obtain reports electronically must become credentialed by and complete contracts with all three CRAs (see 3(C) below).

C. What is the role of other federal agencies, such as the Consumer Financial Protection Bureau and the Federal Trade Commission?

The Consumer Financial Protection Bureau (CFPB) was created under the Dodd-Frank Act of 2010 to consolidate the federal government's approach to consumer financial

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protection. As the regulator of the credit reporting agencies, the CFPB has advised HHS on implementation issues and has produced materials to support state efforts to dispute credit issues for youth in foster care. Together with the Federal Trade Commission (FTC), which also conducts a range of activities related to consumer financial protection, the CFPB has been an invaluable resource to child welfare agencies on consumer protection laws, including the Fair Credit Reporting Act, and the practices of credit reporting agencies.

The FTC has also advised HHS on credit issues and has numerous resources related to preventing and addressing identity theft in particular. CFPB and FTC resources are available on **Resources to Support Implementation of the Credit Check Requirement for Youth in Foster Care**.

3. WORKING WITH THE CRAS

A. What options do child welfare agencies and tribes have for obtaining reports from the credit reporting agencies?

Child welfare agencies have two options for requesting credit reports:

- **The manual process** is a relatively traditional approach by which agency staff send a written request by mail, email or fax to the CRAs for individual young people. This can be done in a centralized fashion (a county, region or state administrator makes the request) or by frontline staff (foster care or independent living worker) on behalf of young people in their caseload. When requesting reports through the manual process, the child welfare agency will receive any consumer disclosure reports (see 3(B) below) that exist for minors so they can be reviewed and disputed if necessary. Those conducting manual requests must also prove that they have the right to do so on behalf of the youth in question by submitting court documentation that the young person is in foster care or a letter on agency letterhead. This process may be more efficient for small counties or states with smaller caseloads.
- The **electronic batch process** allows agencies to send a CSV spreadsheet—similar to an Excel spreadsheet—through each CRA's online portal for creditors and other businesses with a permissible purpose under federal law to pull credit reports. Those using the electronic batch process must be credentialed by each CRA as having all the necessary procedures in place to access their respective online portals, which requires a contract between the child welfare agency and the credit reporting agency. The CRA runs the names and other relevant information (e.g., Social Security number) for all the young people listed on the spreadsheet, and if anything comes up, a credit report is delivered electronically to the agency (see **Accessing Credit Reports through the CRA Online Portals** for more information about the process). The child welfare agency can then refer any credit report that may exist for a young person to the appropriate staff person or contracted agency to review and determine if there are credit issues that need to be disputed or evidence of ID theft that needs to be addressed. The absence of a report for a minor simply means that there are no reported credit issues.

It should be noted that for youth younger than 18, the presence of a credit report is in and of itself a red flag. Legally, minors cannot enter into contracts, so they generally should not have any type of credit report, although there are cases in which the existence of a credit report does not necessarily indicate erroneous or fraudulent activity (one example is if a minor has legitimately been added by a parent or guardian as an authorized user on a credit

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card account). CRAs will flag credit reports that exist for minors in foster care to determine if they were victims of identity theft or other fraudulent activities and to begin the process of disputing the reports.

B. What can agencies expect to get back when a credit issue is identified?

Typically, agencies that use the manual process will receive a **Consumer Disclosure Report** (also called a **Consumer Education Report**), which is similar to what a consumer will get if he or she requests the report through **AnnualCreditReport.com**. Consumer Disclosure Reports are relatively easy to read and include all the information needed to link credit problems back to the original creditor for dispute purposes. Consumer Disclosure Reports are also what young people can use to monitor their credit once they are over 18, so it's important they become comfortable knowing how to understand them. A disadvantage with Consumer Disclosure Reports is that they may be difficult to access if an individual doesn't have all the required information to get through security questions, such as "last known address," which might be challenging for young people who have moved frequently while in care.

Agencies using the online portal will receive a **Business Division Report** if a credit report exists, which is what creditors, employers, landlords, and other businesses receive when they request a credit report for an individual. Business Division Reports may be more difficult to interpret and may not include all the information needed to dispute a report directly with an original creditor. For more on the advantages and disadvantages of Consumer Disclosure Reports and Business Division Reports, see the Credit Builders Alliance reference guide for child welfare agencies, **Accessing Credit Reports for Foster Youth: A Reference Guide for Child Welfare Agencies**.

When an agency receives a Business Division Report for a young person for whom a credit issue has been identified, they should consider requesting a Consumer Disclosure Report from the CRA(s) in question. This will allow them to show the young person what is on his or her report in a format that is easier to understand and more consistent with what he or she will receive when requesting it through **AnnualCreditReport.com** once he or she is 18 and older.

C. How do child welfare agencies become credentialed by the credit reporting agencies to submit electronic batch requests online?

The first step toward obtaining credit reports through the online portal is to become credentialed by each of the three main CRAs (Experian, Equifax and TransUnion). The credentialing process allows the CRAs to conduct their due diligence to ensure the agencies have a permissible purpose for pulling the reports. Once credentialed, a child welfare agency must enter into a contract with the CRAs to outline the requirements of the credit reporting process. Contracts address the purpose for pulling reports, the scope of work and responsibilities of each party (the CRAs and the child welfare agency), including confidentiality of information, data handling/sharing requirements and safeguards, fees and payments, warranties and due process issues, and more. Once contracts have been finalized, the child welfare agency is authorized to pull reports.

Child welfare agencies in state-administered states can become credentialed at the state level. Those in county-administered states likely must become credentialed at the county level. Once credentialed, the state or county can determine who within the agency has the authority to request the reports on behalf of an individual or a group of young people.

D. How difficult is the contracting process?

States and counties report that the contracting process is the most complex and time-consuming aspect of the credit check mandate. Certain standard contractual language may require modification before contracts can be finalized by the agencies, and they typically have to be reviewed by a state office that handles contracts and/or the attorney general's office. While states report few problems working with the CRAs, the contracting process has at times felt daunting and has created lag times for agencies trying to implement the credit check requirement. Given the complexities of the contracting process, states may find it useful to reach out to other child welfare agencies across the country for advice on their experiences.

E. How much does it cost to get credit reports for youth in foster care?

By law, individuals are entitled to receive one free annual Consumer Disclosure Credit Report every year from each CRA. However, the CRAs typically charge for Business Division Reports, which are what child welfare agencies will receive if they request electronic reports through the online portals. According to correspondence with states, Equifax, TransUnion and Experian provide these credit reports for free, which means they are waiving the typical fee for use of the online portal.

4. DEVELOPING STATE POLICY

State and/or county policy is essential to guide the process for securing credit reports for youth in foster care, disputing any inaccuracies, and helping young people understand what is on their credit report, if they have one, and how to protect their credit in the future. Policy should, at a minimum, address the following:

A. Who is responsible for accessing the credit report?

Policy should be clear as to whether the agency is using a manual or electronic process to access reports. If using the manual process, the policy should spell out who is responsible for accessing the report and how that person will be notified when it is time to process the credit check. If the agency is sending a spreadsheet through an online CRA portal, the policy should include clear instructions about who is responsible for producing the spreadsheet, who will send it to the CRA, when it will be sent, and who will review any reports that come back.

B. How does the process differ for minors vs. young people ages 18 and older?

Agency policy should be clear that the process for requesting reports may differ for youth between ages 14 and 17 and those who are 18 and older. Young people 18 and over should be able to access their own consumer disclosure report for free through

By law, individuals are entitled to receive one free annual consumer disclosure credit report every year from each CRA.

annualcreditreport.com. Policy supporting this is recommended—with appropriate assistance of an adult—to ensure that the young adult knows how to pull and review his or her own credit report in the future. However, it may be difficult for a youth to answer all of the security questions required to access his or her report. Agencies should consider instituting an alternative procedure, such as directly requesting older youths' credit reports in batches or individually through the CRA portals, if possible.

C. Who is responsible for addressing any inaccuracies?

The legislation clearly states that child welfare agencies are responsible for addressing any inaccuracies found on the credit reports. This should apply to minors as well as youth 18 and over who are still in foster care. Policy should articulate who is responsible for this process.

D. What are the steps for disputing inaccuracies?

Policy should outline the steps for addressing inaccuracies and the importance of a clear plan for ensuring problems are resolved before youth leave foster care. Disputing errors on credit reports takes time, patience, and understanding of the resources available to support those who are trying to clear credit records for youth. The Credit Builders Alliance and ChildFocus' 2014 six-part webinar series includes a number of resources to support this process, including advice about disputing with both the CRAs and businesses, sample dispute letters, whether to institute a credit freeze, whether to file a police report in instances of identity theft, and more. This series can be accessed on **CBA's website**.

In rare situations, issues of serious identity theft may not be resolved by the time a young person leaves foster care. In these situations, policy should be clear about expectations for linking young people with those who can help them continue to dispute the credit issues until the issues are cleared and/or there is clear documentation of the steps taken to clear their credit so they have the tools to explain these issues to employers, creditors and others in the future.

For more suggestions on disputing reports, see section 5.

E. How should child welfare agencies involve young people in the process?

Older youth need to understand what a credit report is, why it is important, how to protect their credit, and the actions child welfare agencies are taking to check their credit and clear reports if there are any inaccuracies. Policy should clearly set expectations for involving youth in the process and how to determine their developmental readiness to be involved.

F. What credit-related training should child welfare agencies offer to staff and others responsible for youth in care?

The CBA-ChildFocus survey results suggest that many caseworkers have not received sufficient training to fulfill their responsibilities under the credit check mandate. Those who did receive training cited the 2014 webinar series as the only training they have had. It's critically important that caseworkers have the tools and knowledge needed to talk to young people about credit and dispute credit issues. Some suggested resources for training are included in **Resources to Support Implementation of the Credit Check Requirement for Youth in Foster Care**.

5. DISPUTING ERRORS ON THE CREDIT REPORTS

A. What's the best process for disputing errors on credit reports?

While every situation is different, there are some basic guidelines for disputing credit reports that every frontline staff member should know to assist young people with this process:

- **Write a letter to the creditor/business:** For young people whose credit problems were incurred while they were minors, writing a letter to this effect with a copy (never send originals) of their birth certificate to prove their age is often sufficient to have credit issues cleared.
- **Dispute with creditors/businesses and CRAs:** Whenever possible, disputes should be made simultaneously to CRAs and to creditors/businesses. Creditors/businesses that clear credit for a young person are required to inform all CRAs to which they report.
- **Seek help from experts:** When roadblocks occur, there are experts in most communities to assist with this process. Accredited nonprofit credit counseling organizations, some other community-based nonprofit institutions, and the State Attorney General Office have in-depth knowledge that is sometimes needed to clear credit.
- For particularly serious incidences of identity theft or credit errors, a credit freeze may be appropriate. See below for more information on the pros and cons of a credit freeze.

B. What resources are available to help with the dispute process?

Frontline staff and others disputing problems identified on a credit report should not have to reinvent the wheel. Helpful resources to support the dispute process include:

- **Template dispute letter** for minors and 18+ population
- **CBA webinar** on disputing credit problems
- **Credit counseling organizations** across the country who can help with the dispute process
- **CBA members** across the country who can help with the dispute process

C. When should a credit freeze or fraud alert be considered?

The HHS letter issued to all child welfare directors December 5, 2014, encouraged them to consider a credit freeze or fraud alert for certain young people with credit problems. Considerations for whether to freeze credit or issue a fraud alert include:

- **State law:** What is the state law governing credit freezes and fraud alerts, and how would those laws impact young people, including those who may leave care before credit issues have been completely cleared?
- **Limitations:** Credit freezes and fraud alerts only protect young people from new fraud and do not address the existing fraud that has been identified.
- **How to unfreeze or turn off a fraud alert:** Young people in foster care and their families are very mobile and may cycle in and out of care and various placements while in custody. States considering using these tools should have very clear policies and procedures to ensure a credit freeze can be unfrozen and fraud alerts turned off so young people can access credit in the future.

For more on credit freezes and alerts, visit **www.consumer.ftc.gov**

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6. RECOMMENDATIONS TO IMPROVE THE IMPLEMENTATION OF THE CREDIT CHECK REQUIREMENT

There are a number of actions that can and should be taken at multiple levels to improve the likelihood of success with implementing the credit check requirement.

A. What additional actions can the federal government take to support the credit check requirement?

- **Amend existing regulations.** HHS should consider amending existing regulations to require that states, counties and tribes participating in the online process contract with only one CRA as a starting point and extend deadlines for finalizing contracts with the other CRAs.
- **Convene a cross-sector working group to address implementation issues.** HHS should convene a working group made up of CRAs, child welfare agencies, national organizations and key federal agencies (i.e., CFPB and FTC) to brainstorm ways to streamline the credit check process. The working group could consider the following:
    - Challenges of lowering the age to 14 as required in the Preventing Sex Trafficking and Strengthening Families Act, including possible revisions to existing contracts, amendments to laws, IT challenges, challenges of working with younger youth around credit issues, etc.
    - Ways to streamline the credentialing and contracting process to ensure that contracts are negotiated in a timely and mutually acceptable manner.
    - Development of a guide for disputing credit issues for youth in foster care directly with CRAs and creditors/businesses.
    - Clearer guidance on the pros and cons of credit freezes and fraud alerts.
    - Development of suggested data to collect to inform implementation, such as percentage and number of youth in care who have credit reports with errors and/or ID theft and success rates in dealing with both.
- **Develop a plan for technical assistance.** HHS, in consultation with CFPB and FTC, should develop a plan for continued technical assistance on implementation to be carried out by one or a combination of the National Resource Centers. Technical assistance plans should include:
    - Growing and facilitating the Credit Check Learning Community (CCLC) as a safe space for states, counties and tribes to communicate with each other about implementation issues and to share resources, including policies, contracts, forms, training, and data
    - Supports for frontline staff, including curriculum on credit issues, clear instructions on how to dispute credit issues, the pros and cons of fraud protection and products relevant for youth, state laws on how to freeze credit, etc.
    - Mechanisms for child welfare agencies to troubleshoot any issues they have negotiating and finalizing contracts with the CRAs.
    - Technical assistance on the development of clear state policy to guide implementation.
- **Survey the CRAs.** CFPB, as the overseer of CRAs, should survey the CRAs to find out what kinds of implementation challenges they are facing and continue to engage them productively in the process. The CBA/ChildFocus survey of child welfare agencies yielded many important insights into implementation, and CRAs will likely have additional ideas about how to strengthen the process.

Understanding how effective and helpful this process is from the perspective of the young people themselves can help inform the introduction of greater implementation efficiencies and effective policies and procedures throughout the process.

- **Engage young people in the process.** The goal of the credit check mandate is to verify the credit status of youth and help them resolve any errors, identity theft or fraud reflected on their credit reports before they leave foster care. Understanding how effective and helpful this process is from the perspective of the young people themselves can help inform the introduction of greater implementation efficiencies and effective policies and procedures throughout the process. It can also help uncover new and innovative ideas for empowering youth around credit issues as they transition to adulthood.
- **Continued involvement by the CFPB and FTC.** Other federal agencies should develop plans for continued involvement, informed in large part by regularly collected data from the child welfare agencies and the CRAs on their technical implementation experiences, and by the experiences of and outcomes for young people. For instance, the CFPB should continue to support HHS on its regulatory responsibility for the provision and develop materials as needed. FTC should also keep providing technical assistance on identity theft, including ways to prevent ID theft and address it when it occurs.

B. What additional action can states, communities and tribes take to support the credit check requirement?

- **Get started with one credit reporting agency.** States that have not begun to implement the credit check requirement should begin accessing manual reports or develop at least one contract with a credit reporting agency for electronic submission to begin helping young people leave care with clear credit. States that feel they do not have the capacity should reach out to community partners (philanthropy, banks, nonprofit financial institutions, credit counseling organizations, etc.) for assistance.
- **Go beyond the requirements of the law.** States should consider a process to check the credit for all youth in foster care, not just those who are 14 and older, and should develop age-appropriate policies and procedures for dealing with any issues that arise.
- **Get help.** States should develop partnerships with those who have expertise on credit and identity theft issues. Ideas for developing partnerships include:
  - **Convene a statewide or local working group with diverse stakeholders to discuss ways to help young people learn about and protect their credit.** This working group can go beyond child welfare to include other youth-serving systems (juvenile justice, housing, youth employment, education), community-based financial institutions, and businesses that

routinely show up as problematic on young people's credit reports.

- **Develop a partnership with the attorney general's office**, which should have expertise on identity theft and fraud and can help child welfare agencies troubleshoot with CRAs and businesses. Attorney general's offices typically have resource materials to educate and help protect consumers from harmful financial products, scams, and more.
- **Work with statewide or municipal entities** that exist in many communities to build financial capability of adults. Many city and state treasurer's offices, governors, and mayors have created special initiatives to empower low-income adults around financial issues, including becoming safely banked, participating in financial coaching, and building credit through reporting of payments on loans. Child welfare agencies can engage leaders in these initiatives to consider a special focus on youth in foster care.

- **Spread the capacity to help young people build financial capability.** States should develop plans to build knowledge and skill among foster parents, biological parents, youth leaders and others who can help young people with credit issues. To accomplish this, states can work with foster parent associations, non-profit organizations, CASAs, etc. Training and others efforts should building understanding of how identity theft by biological or foster parents impacts the well-being of youth and strategies to help young people deal with it. Such efforts should also focus on prevention of identity theft and future credit problems.
- **Use Chaffee dollars more strategically.** States can use funding from the John H. Chaffee Foster Care Independence Program to develop more effective programs for helping young people with credit and other financial capability issues. Drawing on lessons from the Jim Casey Youth Opportunities Initiative's Opportunity Passport™, outlined in a brief called **Building Financial Capacity for Youth Transitioning from Foster Care**, these efforts should help young people in foster care practice what they are learning in real life and use opportunity moments (buying a car, renting an apartment, first paycheck, etc.) to apply classroom knowledge in real life.
- **Engage young people, including alumni of foster care.** States, counties and tribes can engage young people in the development of policies and practices designed to help them learn about credit, understand what's on their credit report, dispute credit problems and other issues.
- **Engage key businesses.** If trends emerge around the types of business accounts showing up on youth credit reports (i.e., utility accounts in collections), mostly as a result of ID theft, engage directly with executives of those companies to try to strengthen internal controls and prevent future ID theft or improve early warning signs that ID theft might be at play.
- **Ensure young people transition from care with the right tools.** At a minimum, young people leaving care should have a copy of their consumer disclosure credit report, understand the purpose of checking it regularly, and have basic knowledge about the importance of building and protecting their profiles in the future.

C. What additional actions can CRAs take to support the credit check requirement?

- **Streamline the process.** CRAs can create common forms, spreadsheets, and contracts that can serve as templates for states, communities and tribes as they become credentialed to pull credit reports. They should also streamline documentation requirements, particularly for manual reporting.

- **Build capacity.** By now, CRAs likely understand that the credit check requirement is an unfunded mandate and that most child welfare agencies do not have internal expertise around these issues. CRAs might consider some tools and resources that are specifically designed for child welfare agencies, including a fact sheet that describes a step-by-step process for completing contracts, obtaining credit reports, and disputing errors.
- **Be flexible and responsive.** CRAs should be as flexible as possible in their requirements for child welfare agencies. They should also create a single point of contact who can be responsive to their needs.

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