



Division of Community Assistance and Development

Policy & Procedures

Subject: Address Confidentiality Program
Process Owner: Division of Community Assistance and Development
Effective Date: 3/1/2022
Revision Number: 0

Address Confidentiality Program

I. POLICY STATEMENT

The Arizona Address Confidentiality Program (ACP) helps survivors of domestic violence, sexual offenses, and/or stalking from being located by the perpetrator through public Records. The ACP is administered by the Arizona Secretary of State's Office.

The program provides a Substitute Address and confidential mail forwarding services to individuals and families across Arizona.

II. APPLICABILITY

This policy applies to all Division of Community Assistance and Development (DCAD) Employees and contractors that administer or provide services on behalf of the programs. This policy also applies to Applicants and Clients of any DCAD program.

III. AUTHORITY

A.R.S. § 41-166	Address use by state or local government entities
DES-1-01-45	DES Address Confidentiality Program
DES 1-01-45-01	Requesting an ACP Participant's Actual Address

IV. DEFINITIONS

ACP Authorization Card: The card issued 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, as well as the effective and expiration dates of the person's participation in the ACP.

ACP Contact: DES Employee who responds to the Division's ACP questions and cooperates with the DES ACP Coordinator and the Secretary of State's ACP Office on ACP matters.

Actual Address: The residential, work, or school address as specified on the individual's application to be a program Participant. The Actual Address includes the county and voting precinct number.

Address Confidentiality Program (ACP): Program administered by the Secretary of State that ensures a Participant's Protected Information is confidential by using a Substitute Address and Redacting their Physical Address from electronic and hard copy Records.

Applicant: A person who is applying for a DCAD program.

Client: A person who receives a benefit from a DCAD program.

Division: Division of Community Assistance and Development (DCAD).

Employee: Any full-time or part-time worker, contractor, or temporary paid or unpaid worker, who is employed directly by DES/DCAD.

Mail Forwarding: The process of redirecting mail addressed to one location to another address.

Participant(s): Person(s) who is enrolled in ACP.

Protected Information: A person's phone number, city, county, and home, work or school address.

Program Representatives: Designated Employee from each program who will be responsible for updating Records when notified of an ACP Participant.

Record: All systems, books, paper, emails, maps, photographs, or other documentary materials, regardless of physical form or characteristics, including prints or copies of such items produced or reproduced on film or electronic media pursuant to A.R.S. § 41-151.16, made or received by any governmental agency in pursuance of law or in connection with the transaction of public business and preserved or appropriate for preservation by the agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the

government, or because of the informational and historical value of the data contained therein. All forms of recorded media are included in this definition from the traditional paper forms to electronic types in use, or forms of Records not yet invented.

Redact: The process of concealing sensitive information in a document before being released to someone not authorized to see that information. Redaction is used to protect an individual's privacy or to ensure personal information is not compromised. For the purposes of this policy, Redact refers to the process to edit a document to delete or mask the Client's or Applicant's Actual Address.

Substitute Address: The address designated by the Secretary of State's ACP Office to be used instead of an Actual Address. This address is 1901 W. Madison Street, Apt. #XXX, Phoenix, AZ 85009.

V. POLICY

A. Overview

1. An Applicant or Client who participates in ACP must not be required to provide Protected Information in order to apply for programs offered through the Division, unless the Information is required to determine program eligibility.
2. Participation in ACP does not exempt an Applicant from meeting all relevant program eligibility criteria.

B. Application for a Division of Community Assistance and Development (DCAD) Program

1. In order to demonstrate ACP participation, an Applicant or Client must submit the following supporting documentation:
 - a. Proof of ACP participation
 - i. ACP Authorization Card; or
 - ii. Letter by the Secretary of State's ACP office showing that they are participating in the program.

- b. If an Applicant does not have proof of ACP participation, an Employee must contact the Secretary of State's ACP Office by calling (602) 542-1892 to verify that the person is an ACP Participant.
 - 2. The Employee must document confirmation of ACP participation. Documentation may include:
 - a. A copy of the ACP Authorization Card (front and back);
 - i. If the card appears altered or fraudulent, the Employee must request the original or contact the Secretary of State's Office to confirm participation.
 - b. A copy of the ACP Letter from the Secretary of State's Office; or
 - i. If the letter appears altered or fraudulent, the Employee must request the original or contact the Secretary of State's Office to confirm participation.
 - c. Documenting the phone call made to the Secretary of State's Office.
 - 3. Upon confirmation of an Applicant's ACP participation, an Employee must accept the Substitute Address in completing application materials, unless a Participant's Protected Information is needed to determine program eligibility.
 - 4. If assistance is needed, contact the DCAD ACP contact.

C. Terminating ACP Participation

ACP protections to a verified ACP Participant must continue until:

- 1. The ACP Participant requests that DCAD cease providing ACP protection. The request to terminate ACP protection must be received only from the ACP Participant, or from the ACP Participant's parent or guardian when the ACP Participant is a minor or incapacitated adult; or
- 2. Mail sent to the ACP Participant at the Participant's Substitute Address is returned to the program as undeliverable.

VI. PROCEDURE

A. Employee Responsibilities

1. An Employee must comply with the ACP policy as detailed above.
2. An Employee must verify a person's participation in the ACP program.
3. An Employee must accept the Participant's Substitute Address, unless the Actual Address is needed for program eligibility.
4. An Employee must review all Records and make the following changes for all Records created less than 90 days prior to the date of ACP participation:
 - a. Redact the Participant's Protected Information;
 - b. Change the Actual Address to the Substitute Address in any Department Record. This includes documents that may have been provided by the Participant; and
 - c. Ensure that a City/County resident letter provided by the Secretary of State is not saved in Division Records, if applicable.
5. After the Employee has Redacted/changed the Participant's Protected Information, the Employee must send an email to acpdcad@azdes.gov within 5 business days. In the email, the Employee must provide the following information:
 - a. Participant's name;
 - b. Participant date of birth;
 - c. The name of the program/benefit that the Participant applied for;
 - d. Start Date of Participant's ACP eligibility; and
 - e. Confirmation that the Participant's Protected Information has been changed or Redacted in all Records.

B. Program Representative Responsibilities

1. When a Program Representative is notified by the DCAD ACP Contact that a person is an ACP Participant, the Program Representative must:
 - a. Review all Records and make the appropriate changes for all Records created less than 90 days prior to the date of ACP

participation, if applicable; and

- b. Notify the DCAD ACP contact that a Records search was completed and all applicable changes have been made.

C. DCAD ACP Contact Responsibilities

1. The DCAD ACP Contact will check the acpdcad@azdes.gov twice per week.
2. If the DCAD ACP Contact is notified of any ACP Participants, the ACP Contact will send an email with a list of ACP Participants to assigned Program Representatives. The email will also include instructions on changing/Redacting a Participant's Protected Information.
3. The ACP Contact will send a follow up email within 5 business days.
4. Maintain a spreadsheet of all DCAD ACP Participants.
5. Periodically conduct trainings for DCAD staff and community partners on ACP policies and procedures.
6. Conduct an annual review to ensure ACP Participants' information has been Redacted.
7. Respond to any Employee questions on ACP.