Introduction

Focus of today’s discussion is on complete and accurate reporting, specific to:

- Fair Credit Reporting Act (FCRA)
- Fair Credit Billing Act (FCBA)
- Accounts included in Bankruptcy
- Equal Credit Opportunity Act (ECOA)
Disclaimer

- The purpose of this training is to provide guidance in Metro 2® reporting.
- This information is not intended to be legal advice.
- Furnishers are solely responsible for the accuracy of the information furnished to a consumer reporting agency.
No legal advice. Any person using the CRRG®, the Metro 2® Format, or information from the Metro 2® Task Force concerning the Metro 2® Format; or any software vendors that provide Metro 2® programming software acknowledges that such documents or communications are not made available for the purpose of providing legal advice or other counsel concerning the accuracy of the information furnished to a consumer reporting agency. Such persons rely solely upon their own determination as to the selection of the appropriate Metro 2® Code to meet any furnisher obligations under the FCRA.
Disclaimer of liability. Any person using the CRRG®, the Metro 2® Format, or information from the Metro 2® Task Force concerning the Metro 2® Format; or any software vendors that provide Metro 2® programming software acknowledges that the fees paid, directly or indirectly, to receive the CRRG®, the Metro 2® Format, or information from the Metro 2® Task Force concerning the Metro 2® Format are based upon the expectation that such person will be solely responsible for the accuracy of the information furnished to a consumer reporting agency.
ANY PERSON USING THE CRRG®, THE METRO 2® FORMAT OR INFORMATION OBTAINED FROM THE METRO 2® TASK FORCE; OR ANY SOFTWARE VENDORS THAT PROVIDE METRO 2® PROGRAMMING SOFTWARE AGREES THAT UNDER NO CIRCUMSTANCES WILL THE CONSUMER DATA INDUSTRY ASSOCIATION (CDIA) OR ANY CONSUMER REPORTING AGENCY HAVE ANY OBLIGATION OR LIABILITY TO SUCH PERSON FOR ANY DIRECT, INDIRECT, INCIDENTAL, CONSEQUENTIAL, PUNITIVE OR SPECIAL DAMAGES SUSTAINED BY SUCH PERSON ARISING OUT OF SUCH PERSON’S FURNISHING OF CONSUMER INFORMATION TO A CONSUMER REPORTING AGENCY REGARDLESS OF HOW SUCH DAMAGES ARISE AND WHETHER OR NOT THE CONSUMER REPORTING AGENCY OR CDIA WAS ADVISED SUCH DAMAGES MIGHT ARISE. SHOULD THIS DISCLAIMER CONFLICT WITH ANY PROVISION OF ANY OTHER AGREEMENT, SUCH PERSON AGREES THAT THIS DISCLAIMER SHALL SUPERSEDE SUCH CONFLICTING PROVISION.
Discussion Topics

- Data Accuracy and Integrity
- Compliance Condition Codes
  - Accounts closed at consumer’s request
  - Accounts in dispute
- Date of First Delinquency
- Consumer Information Indicators
  - Bankruptcy or Personal Receivership
  - Reaffirmation of Debt or Lease Assumption
- ECOA Codes
Federal regulatory agencies issued rules to implement the accuracy and integrity provisions in Section 312 of the Fair and Accurate Credit Transactions Act that amended Section 623 of the FCRA Data Furnisher Regulations.

The rules pertain to the accuracy and integrity of the information about consumers that is furnished to Consumer Reporting Agencies (CRAs).

Effective date July 1, 2010
```
“Accuracy” means that information a furnisher provides to a consumer reporting agency about an account or other relationship with the consumer correctly:

- Reflects the terms of and liability for the account or other relationship;
- Reflects the consumer’s performance and other conduct with respect to the account or other relationship; and
- Identifies the appropriate consumer.
```
Accuracy

Consumer-level information:

- Complete name: Surname, First Name, Middle Name, Generation Code
- Social Security Number, Date of Birth
- Telephone Number
- ECOA Code
- Consumer Information Indicator
“Integrity” means that information provided to a CRA about an account or other relationship with the consumer:

- Is substantiated by the furnisher’s records at the time it is furnished;
- Is furnished in a form and manner that is designed to minimize the likelihood that the information may be incorrectly reflected in a consumer report; and
- Includes Credit Limit, if applicable and in the furnisher’s possession.
Account-level information:

- Account Number, Identification Number, Portfolio Type, Account Type, Terms Duration, Terms Frequency, Interest Type Indicator, Scheduled Monthly Payment Amount, Date Opened, Original Amount, Credit Limit

- Date of Account Information, Account Status, Payment Rating, Payment History Profile, Date of First Delinquency, Special Comment, Compliance Condition Code, Highest Credit, Current Balance, Amount Past Due, Actual Payment Amount, Date of Last Payment, Date Closed
The “as of” date for the account being reported.

All other information reported for the account will be “as of” this date, such as Account Status and Current Balance.
Compliance Condition Codes
Field 20

- Assists in complying with reporting requirements of the Fair Credit Reporting Act and/or the Fair Credit Billing Act

- Required field when it applies to the account being reported
Compliance Condition Codes

- **Closed Accounts:**
  
  XA = Account closed at consumer’s request
Examples – CCC XA

- Consumer notifies bank that they want to close their credit card even though they still have an outstanding balance.
  - Account Status = 11
  - Current Balance = 2459
  - CCC = XA

- When paid in full:
  - Account Status = 13
  - Cur Balance = 0
  - CCC = XA (or blank)
Compliance Condition Codes
Disputed Accounts

- **FCRA:**
  - XB = Account information disputed by consumer under Fair Credit Reporting Act
  - XC = Completed investigation of FCRA dispute – consumer disagrees

- **FCBA:**
  - XF = Account in dispute under FCBA
  - XG = FCBA dispute resolved – consumer disagrees

- **FCRA/FCBA:**
  - XH = Account previously in dispute – investigation completed, reported by data furnisher
Examples - Disputes

- **Disputed:**
  - Account Status 71
  - Current Balance = 5288
  - CCC = XF

- **Resolved:**
  - Account Status = 11
  - Current Balance = 5204
  - CCC = XR or XH

XH will remain until you tell us to delete it.
Compliance Condition Codes

Combination Codes

- XD = Account closed at consumer’s request and in dispute under FCRA
- XE = Account closed at consumer’s request and dispute investigation completed, consumer disagrees (FCRA and FCBA)
- XJ = Account closed at consumer’s request and in dispute under FCBA
Example – Combination Codes

- Consumer requests the account be closed:
  - Account Status = 11
  - Current Balance = 2960
  - CCC = XA

- Consumer now disputes the acct:
  - Account Status = 11
  - Current Balance = 2942
  - CCC = XD
Continued Example

When dispute resolved:

- Account Status = 11
- Current Balance = 2896
- CCC = XA

It’s important to retain the fact that the consumer requested the account be closed.
Compliance Condition Codes

Report code one time only when condition applies. Code will be retained until another code or the removal value is reported.

Example:

<table>
<thead>
<tr>
<th>Date of Account Information</th>
<th>CCC</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/10/2015</td>
<td>XB</td>
<td>XB is added to file.</td>
</tr>
<tr>
<td>02/10/2015</td>
<td>Blank</td>
<td>XB is retained.</td>
</tr>
<tr>
<td>03/10/2015</td>
<td>Blank</td>
<td>XB is retained.</td>
</tr>
<tr>
<td>04/10/2015</td>
<td>XA</td>
<td>XB is replaced by XA.</td>
</tr>
</tbody>
</table>

© 2015, Consumer Data Industry Association
Compliance Condition Codes

Optionally, CCCs may be reported every month as long as the condition applies.

Example:

<table>
<thead>
<tr>
<th>Date of Account Information</th>
<th>CCC</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/10/2015</td>
<td>XB</td>
<td>XB is added to file.</td>
</tr>
<tr>
<td>02/10/2015</td>
<td>XB</td>
<td>XB is retained.</td>
</tr>
<tr>
<td>03/10/2015</td>
<td>Blank</td>
<td>XB is retained.</td>
</tr>
<tr>
<td>04/10/2015</td>
<td>XR</td>
<td>XB is removed.</td>
</tr>
</tbody>
</table>
Compliance Condition Codes

Removal Code:
XR = Removes most recently reported Compliance Condition Code

<table>
<thead>
<tr>
<th>Date of Account Information</th>
<th>CCC</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/10/2015</td>
<td>XF</td>
<td>XF is added to file.</td>
</tr>
<tr>
<td>02/10/2015</td>
<td>XF</td>
<td>XF is retained.</td>
</tr>
<tr>
<td>03/10/2015</td>
<td>XR</td>
<td>XF is removed.</td>
</tr>
</tbody>
</table>
Compliance Condition Codes

- *Do NOT use XR as a default value.*
- If a Compliance Condition Code does not apply, blank fill this field.
For questions about the use of Compliance Condition Codes or how long to report them, data furnishers should consult with their internal Legal counsel or Compliance area.
If I send Blank in the CCC field, will the CCC I reported last month be deleted?

No. Blank does not remove a previously-reported CCC.

Important: You must still report the Removal value (XR) when you want to delete the previously-reported CCC.
Compliance Condition Codes (CCCs)

Common Questions

- Do I have to delete the previously-reported CCC before I can report a new one?
  - No. A newly reported CCC will automatically replace the previously-reported code.
FCRA Compliance/
Date of First Delinquency
Field 25

- Used to ensure compliance with the Fair Credit Reporting Act
- Contains the date of the first delinquency, in an unbroken chain, that led to the status being reported
# Date of First Delinquency Hierarchy

<table>
<thead>
<tr>
<th>Account Status Codes that are Delinquent, Derogatory and Paid derogatory</th>
<th>Date of first delinquency that led to Account Status being reported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payment Ratings that are Delinquent and Derogatory with specified Account Status Codes</td>
<td>Date of first delinquency that led to Payment Rating being reported</td>
</tr>
<tr>
<td>Current Account with Bankruptcy, Personal Receivership or Reaffirmation Rescinded</td>
<td>Date of bankruptcy or personal receivership notification</td>
</tr>
</tbody>
</table>

© 2015, Consumer Data Industry Association
Example of Date of First Delinquency
Delinquent to Current & Delinquent Again

<table>
<thead>
<tr>
<th>Date of Acct Information</th>
<th>Due Date</th>
<th># of Days Past Due Date</th>
<th>Status</th>
<th>Date of 1st Delinq</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/11/2015</td>
<td>12/20/2014</td>
<td>0</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>02/11/2015</td>
<td>01/20/2015</td>
<td>22</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>03/11/2015</td>
<td>01/20/2015</td>
<td>50</td>
<td>71</td>
<td>02/19/2015</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1st Delinquency)</td>
</tr>
<tr>
<td>04/11/2015</td>
<td>01/20/2015</td>
<td>81</td>
<td>78</td>
<td>02/19/2015</td>
</tr>
<tr>
<td>05/11/2015</td>
<td>04/20/2015</td>
<td>21</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>06/11/2015</td>
<td>04/20/2015</td>
<td>52</td>
<td>71</td>
<td>05/20/2015</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1st Delinquency)</td>
</tr>
<tr>
<td>07/11/2015</td>
<td>04/20/2015</td>
<td>82</td>
<td>78</td>
<td>05/20/2015</td>
</tr>
<tr>
<td>08/11/2015</td>
<td>04/20/2015</td>
<td>113</td>
<td>80</td>
<td>05/20/2015</td>
</tr>
<tr>
<td>09/11/2015</td>
<td>04/20/2015</td>
<td>144</td>
<td>93</td>
<td>05/20/2015</td>
</tr>
</tbody>
</table>
### Example of Date of First Delinquency
Delinquent account never returns to current

<table>
<thead>
<tr>
<th>Date of Acct Information</th>
<th>Due Date</th>
<th># of Days Past Due Date</th>
<th>Status</th>
<th>Date of 1st Delinq</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/31/2015</td>
<td>01/01/2015</td>
<td>0</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>02/28/2015</td>
<td>02/01/2015</td>
<td>27</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>03/31/2015</td>
<td>02/01/2015</td>
<td>58</td>
<td>71</td>
<td>03/03/2015</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1st Delinquency)</td>
</tr>
<tr>
<td>04/30/2015</td>
<td>02/01/2015</td>
<td>88</td>
<td>78</td>
<td>03/03/2015</td>
</tr>
<tr>
<td>05/31/2015</td>
<td>02/01/2015</td>
<td>119</td>
<td>80</td>
<td>03/03/2015</td>
</tr>
<tr>
<td>06/30/2015</td>
<td>02/01/2015</td>
<td>149</td>
<td>82</td>
<td>03/03/2015</td>
</tr>
<tr>
<td>07/31/2015</td>
<td>03/01/2015</td>
<td>152</td>
<td>82</td>
<td>03/03/2015</td>
</tr>
<tr>
<td>08/31/2015</td>
<td>All payments made</td>
<td>N/A</td>
<td>13+</td>
<td>03/03/2015</td>
</tr>
</tbody>
</table>

**Payment Rating = 6**
## Example of Date of First Delinquency
### Rolling delinquencies

<table>
<thead>
<tr>
<th>Date of Acct Information</th>
<th>Due Date</th>
<th># of Days Past Due Date</th>
<th>Status</th>
<th>Date of 1st Delinq</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/11/2015</td>
<td>12/20/2014</td>
<td>21</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>02/11/2015</td>
<td>12/20/2014</td>
<td>52</td>
<td>71</td>
<td>01/19/2015 (1st Delinquency)</td>
</tr>
<tr>
<td>03/11/2015</td>
<td>01/20/2015</td>
<td>50</td>
<td>71</td>
<td>01/19/2015</td>
</tr>
<tr>
<td>04/11/2015</td>
<td>01/20/2015</td>
<td>81</td>
<td>78</td>
<td>01/19/2015</td>
</tr>
<tr>
<td>05/11/2015</td>
<td>01/20/2015</td>
<td>111</td>
<td>80</td>
<td>01/19/2015</td>
</tr>
<tr>
<td>06/11/2015</td>
<td>04/20/2015</td>
<td>52</td>
<td>71</td>
<td>01/19/2015</td>
</tr>
<tr>
<td>07/11/2015</td>
<td>05/20/2015</td>
<td>52</td>
<td>71</td>
<td>01/19/2015</td>
</tr>
<tr>
<td>08/11/2015</td>
<td>05/20/2015</td>
<td>83</td>
<td>78</td>
<td>01/19/2015</td>
</tr>
</tbody>
</table>
FCRA Compliance/ Date of First Delinquency

Credit Reporting Resource Guide®
Exhibit contains:

- Reporting guidelines
- Flowchart demonstrating the hierarchy
- Examples for reporting the date of first delinquency
- Excerpts from the FCRA
FCRA Compliance/
Date of First Delinquency
Common Questions

- If the due date is the 1st of the month and the consumer doesn’t make their February payment, how do we report the Account Status and Date of First Delinquency when we report on February 28th?

- Delinquencies are calculated based on the Due Date.

- Standard definitions of delinquent statuses are based on “number of days past the due date”.

© 2015, Consumer Data Industry Association
### Example of Account Status/Date of First Delinquency – “February” Question

<table>
<thead>
<tr>
<th>Date of Acct Information</th>
<th>Due Date</th>
<th># Days Past Due Date</th>
<th>Status</th>
<th>Date of 1st Delinq</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/31/2015</td>
<td>01/01/2015</td>
<td>0</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>02/28/2015</td>
<td>02/01/2015</td>
<td>27</td>
<td>11</td>
<td>Zero fill</td>
</tr>
<tr>
<td>03/31/2015</td>
<td>02/01/2015</td>
<td>58</td>
<td>71</td>
<td>03/03/2015</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1st Delinquency)</td>
</tr>
<tr>
<td>04/30/2015</td>
<td>02/01/2015</td>
<td>88</td>
<td>78</td>
<td>03/03/2015</td>
</tr>
</tbody>
</table>
FCRA Compliance/
Date of First Delinquency
Common Questions

If we purchase an account from another lender and the account is delinquent, what Date of First Delinquency do we report?

- DOFD with the *original lender* that led to the account status being reported
- If *original lender’s* DOFD is not available, do not report the account.
Consumer Information Indicators (CII)
Field 38 – Base Segment
Field 11 – J1 and J2 Segments

- Used to report information at the consumer level, rather than at the account level
- Contains a value that indicates a special condition that applies only to the consumer on whom it is reported
- Separate CII field for each consumer reported on an account (primary and associated borrowers)
Consumer Information Indicators

- 3 Categories of CII:
  - Bankruptcy or Personal Receivership
  - Reaffirmation of Debt or Lease Assumption
  - Credit grantor cannot locate consumer / consumer located
Consumer Information Indicators

Bankruptcy

- Petitions for Bankruptcy
  - A = Chapter 7
  - B = Chapter 11
  - C = Chapter 12
  - D = Chapter 13

- Discharged/Completed through Bankruptcy
  - E = Chapter 7
  - F = Chapter 11
  - G = Chapter 12
  - H = Chapter 13

© 2015, Consumer Data Industry Association
Consumer Information Indicators

Bankruptcy

- Dismissed Bankruptcies
  - I = Chapter 7
  - J = Chapter 11
  - K = Chapter 12
  - L = Chapter 13

- Withdrawn Bankruptcies
  - M = Chapter 7
  - N = Chapter 11
  - O = Chapter 12
  - P = Chapter 13
Consumer Information Indicators

Personal Receivership

- 1A = Personal Receivership (specific to Wisconsin)
Consumer Information Indicators
Reaffirmation of Debt or
Lease Assumption

- R = Reaffirmation of Debt
- V = Chapter 7 Reaffirmation of Debt Rescinded
- 2A = Lease Assumption
Consumer Information Indicators

Report code one time only when condition applies. Code will be retained until another code or the removal value is reported.

Example:
- A is reported in January 2015.
- Blank is reported in February 2015, so A is retained.
- E is reported in March 2015.
- In March, A is replaced by E.
Consumer Information Indicators

As an option, the same CII can be reported each month as long as it applies.

Example:

- A is reported in January 2015.
- A is reported in February 2015, so A is retained.
- E is reported in March 2015.
- In March, A is replaced by E.
Consumer Information Indicators Removal Codes

Each category of Consumer Information Indicators has its own removal code.

- **Q** = Removes Bankruptcy Indicators A-P, Z, or Personal Receivership Indicator 1A
- **S** = Removes Reaffirmation of Debt and Rescinded Indicators R, V, or 2A

Example:

- A is reported in January 2015 in error.
- Q is reported in February 2015 to remove the Bankruptcy CII A.
Consumer Information Indicators
Removal Codes

- Do not use a removal code as a default value.
- If a CII does not apply to the consumer, blank fill this field.
Consumer Information Indicators

Example of Bankruptcy Progression:

1. Martin files a Bankruptcy Chapter 7 petition.
   Report CII = A.

2. Martin reaffirms through the court that he will repay his car loan to ABC Bank.
   Report CII = R.

3. Martin finds that he cannot pay ABC Bank. The reaffirmation is rescinded through the court.
   Report CII = V.
Consumer Information Indicators

Another example of progression:

1. A petition is filed for Bankruptcy.
2. The petition is dismissed by the court.
Consumer Information Indicators

Example of Bankruptcy Progression:

1. Jeremy files a Bankruptcy Chapter 13 petition.  
   Report CII = D.

2. The court dismisses the petition.  
   Report CII = L.
Example of Bankruptcy Progression:

1. Margaret files a Bankruptcy Chapter 7 petition.
   Report CII = A.

2. The Bankruptcy is discharged.
   Report CII = E.
Consumer Information Indicators

Example – Only primary borrower filed petition for Chapter 7:

- Base Segment CII = **A**  
  (Chapter 7 Petition)

- J1 Segment CII = **Blank**  
  (Bankruptcy not applicable)
Consumer Information Indicators

Example – CII plus Account Status Code:

- Base Segment CII = A
  (Chapter 7 Petition filed)
- J1 Segment CII = Blank
  (Bankruptcy not applicable – non-filer)
- Account Status Code = 84
  (180 days or more past the due date)
- Current Balance = $2,124
Consumer Information Indicators

Example – Both borrowers filed petition for Chapter 7:

- Base Segment CII = A (Chapter 7 Petition)
- J1 Segment CII = A
- Account Status = 83 (150-179 days past the due date)
- Current Balance = $5,955
Example – Two different CIIs:

- Base Segment CII = A
  (Chapter 7 Petition)
- J1 Segment CII = T
  (Credit grantor cannot locate consumer)
## Consumer Information Indicator Recap

<table>
<thead>
<tr>
<th>Account Number</th>
<th>Consumer 1</th>
<th>Consumer 2</th>
<th>CII</th>
</tr>
</thead>
<tbody>
<tr>
<td>2464567</td>
<td></td>
<td></td>
<td>A</td>
</tr>
<tr>
<td></td>
<td>A</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td>3575335</td>
<td></td>
<td></td>
<td>A</td>
</tr>
<tr>
<td></td>
<td>A</td>
<td>Blank</td>
<td></td>
</tr>
<tr>
<td>4676468789</td>
<td></td>
<td></td>
<td>A</td>
</tr>
<tr>
<td></td>
<td>A</td>
<td>T</td>
<td></td>
</tr>
</tbody>
</table>

© 2015, Consumer Data Industry Association
### Example: Date of 1st Delinquency

**Current Account in Bankruptcy**

<table>
<thead>
<tr>
<th>DOAI</th>
<th>Status</th>
<th>Definition</th>
<th>CII</th>
<th>Date of 1st Delinq</th>
</tr>
</thead>
<tbody>
<tr>
<td>02/28/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>03/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>04/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>05/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>06/30/2015</td>
<td>11</td>
<td>Current</td>
<td>A*</td>
<td>06/14/2015</td>
</tr>
<tr>
<td>07/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero fill</td>
</tr>
</tbody>
</table>

* Consumer Information Indicator A = Petition for Chapter 7 Bankruptcy
### Example: Date of 1st Delinquency
Current Account in Bankruptcy

<table>
<thead>
<tr>
<th>DOAI</th>
<th>Status</th>
<th>Definition</th>
<th>CII</th>
<th>Date of 1st Deling</th>
</tr>
</thead>
<tbody>
<tr>
<td>02/28/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>03/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>04/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>05/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>06/30/2015</td>
<td>11</td>
<td>Current</td>
<td>A*</td>
<td>06/14/2015</td>
</tr>
<tr>
<td>07/30/2015</td>
<td>11</td>
<td>Current</td>
<td>A</td>
<td>06/14/2015</td>
</tr>
</tbody>
</table>

* Consumer Information Indicator A = Petition for Chapter 7 Bankruptcy
Example: Date of 1st Delinquency

<table>
<thead>
<tr>
<th>DOAI</th>
<th>Status</th>
<th>Definition</th>
<th>CII</th>
<th>Date of 1st Delinq</th>
</tr>
</thead>
<tbody>
<tr>
<td>02/28/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>03/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>04/30/2015</td>
<td>11</td>
<td>Current</td>
<td>Blank</td>
<td>Zero Fill</td>
</tr>
<tr>
<td>05/30/2015</td>
<td>71</td>
<td>Delinq 30</td>
<td>Blank</td>
<td>05/14/2015</td>
</tr>
<tr>
<td>06/30/2015</td>
<td>78</td>
<td>Delinq 60</td>
<td>A*</td>
<td>05/14/2015</td>
</tr>
</tbody>
</table>

* Consumer Information Indicator A = Petition for Chapter 7 Bankruptcy
Relief from Stay

- A Bankruptcy judge grants a secured creditor the right to collect the debt to the extent that the order permits.

- For credit reporting purposes, the account is still included in Bankruptcy and the appropriate Consumer Information Indicator should be reported.
Reaffirmed Debts

Completely Reaffirmed Debts:
Report Consumer Information Indicator ‘R’ for the consumer(s) to whom it applies.

Reaffirmation Rescinded:
Report Consumer Information Indicator V for the consumer(s) to whom it applies.
Reaffirmed Debts

Partially Reaffirmed Debts:

- For the consumer who reaffirms a portion of the debt, report a separate tradeline with a new Account Number for the portion of the account that is reaffirmed & in repayment. Report Consumer Information Indicator ‘R’. Adjust the Current Balance.

- Report the original tradeline, which is included in Bankruptcy, with the appropriate Account Status and the Bankruptcy CII for the consumer to whom it applies. Adjust the Current Balance.
Reaffirmed Debts

Partially Reaffirmed Debts:

- If the partial Reaffirmation of Debt is subsequently rescinded, report the new account with Account Status DA to delete the account.
Debts that are Not Reaffirmed

Accounts must be reported with the appropriate Bankruptcy Consumer Information Indicator if they are included in Bankruptcy.
Debts Not Included in BK

- When notified of the petition, report applicable CII.
- Follow guidance in FAQ 27 or 28 for months between petition and final resolution.
- Remove petition indicator by reporting CII Q:
  - For Chapter 7, 11 or 12 → when BK is discharged
  - For Chapter 13 → when the repayment plan is completed. Also, if an associated borrower had been terminated from the account, re-report this borrower with an active ECOA Code.
- Continue reporting the account normally going forward.
Voluntarily Surrendered or Redeemed Merchandise

Voluntarily Surrendered Merchandise:
- Report Account Status 95 (Voluntary Surrender)
- Report appropriate Consumer Information Indicator

 Redeemed Merchandise:
- Report Account Status 13 (Paid/Closed)
- Report Special Comment AU (Account paid in full for less than the full balance)
- Report appropriate Consumer Information Indicator
Chapter 13 – FAQ 28(a)
All associated borrowers filed BK

MONTH BK 13 FILED:

- Base Segment CII = D (Chapter 13 Petition)
- J1 Segment CII = D
- Account Status = 11 (Current - 0 → 29 days past the due date)
- Payment History Profile = 000000000000
  000000000000
- Current Balance = $9,245
- Scheduled MPA = $125
- Amount Past Due = $0

© 2015, Consumer Data Industry Association
Chapter 13
All associated borrowers filed BK

MONTHS BETWEEN PETITION FILED & BK RESOLUTION:

- Base Segment CII = **Blank or D**
- J1 Segment CII = **Blank or D**
- Account Status = **11**
  (Current - 0 → 29 days past the due date)
- Payment History Profile = D000000000000
                           000000000000
- Current Balance = **$9,245**
- Scheduled MPA = **$125**
- Amount Past Due = **$0**
Chapter 13

All associated borrowers filed BK

**PLAN CONFIRMED:**

- Base Segment CII = Blank or D
- J1 Segment CII = Blank or D
- Account Status = 11
  (Current - 0 → 29 days past the due date)
- Payment History Profile = DDD0000000000
  000000000000
- Current Balance = $5,000 (per plan)
- Scheduled MPA = $55 (per plan)
- Amount Past Due = $0

© 2015, Consumer Data Industry Association
Chapter 13
All associated borrowers filed BK

PLAN COMPLETED:
- Base Segment CII = H
- J1 Segment CII = H
- Account Status = 11 (Current - 0 → 29 days past the due date)
- Payment History Profile = DDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDOO
Month BK Filed:
- Report filer
- Terminate non-filer (ECOA Code ‘T’)

Months between Petition and Plan Completion:
- Report filer
- Do not report non-filer

If creditor intends to collect additional monies from non-filer after case is closed, non-filer can be reported at least one month after the CII H is reported for the filer.
Closed Bankruptcies

- Report Consumer Information Indicator ‘Q’ to remove the previously-reported bankruptcy petition indicator.

- If the case is re-opened, report the appropriate CII according to the disposition; e.g., petition, discharge.
Multiple Bankruptcies for Multiple Borrowers

Reporting guidance for various situations:

- Multiple associated borrowers
- The same or different BK Chapters
- Filing within the same reporting period or different reporting periods
Consumer Information Indicators

- Credit Reporting Resource Guide®
  - Frequently Asked Questions & Answers
  - Accounts Included in Bankruptcy

© 2015, Consumer Data Industry Association
If a consumer files Bankruptcy Chapter 13 and the court says they only need to pay back $10,000 of the $15,000 they still owe, what Current Balance do I report?

- Report the court-determined repayment amount of $10,000.
- Current Balance may decline as consumer makes payments.
If the consumer converts from a Chapter 7 Bankruptcy to a Chapter 13 Bankruptcy, do I have to remove the Chapter 7 indicator before reporting the Chapter 13 indicator?

No – reporting a new CII value causes the previously-reported value to be overlaid.
Consumer Information Indicators

Common Questions

- If I blank-fill the CII field, will the previously-reported CII be removed?
  - No. You must report the Removal value (Q or S) when you want to delete a previously-reported CII.
Consumer Information Indicators

Common Questions

- How should I report an account that’s included in a Personal Receivership plan in Wisconsin?
  - If the Terms Duration and Scheduled Monthly Payment Amount were modified by the plan, report the new values. Include CII = 1A for the consumer who filed the plan.
  - When the plan has been completed or is dismissed, report CII = Q to remove the Personal Receivership indicator.
ECOA Codes

Field 37 – Base Segment
Field 10 – J1 and J2 Segments

- Meets the reporting requirements of the Equal Credit Opportunity Act (ECOA)
- Defines the relationship of the consumer to the account
- Separate ECOA Code for each consumer reported on an account (primary and associated borrowers)
<table>
<thead>
<tr>
<th>ECOA Code</th>
<th>Definition</th>
<th>Metro 2® Segments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Individual (May be reported in J1 or J2 if Base consumer is reported with ECOA = T, X or Z)</td>
<td>Base</td>
</tr>
<tr>
<td>2</td>
<td>Joint – contractual liability</td>
<td>Base, J1, J2</td>
</tr>
<tr>
<td>3</td>
<td>Authorized User</td>
<td>J1, J2</td>
</tr>
<tr>
<td>5</td>
<td>Co-maker or Guarantor</td>
<td>J1, J2</td>
</tr>
<tr>
<td>7</td>
<td>Maker (May be reported in J1 or J2 if more than one maker on account.)</td>
<td>Base</td>
</tr>
</tbody>
</table>
Association Terminated

\( T = \text{Association with account terminated} \)

Month 1:
- Base ECOA for Paul = 2
- J1 ECOA for Cynthia = 2

Month 2:
- Base ECOA for Paul = \( T \)
- J1 ECOA for Cynthia = 1

Month 3:
- Base ECOA for Cynthia = 1
Deceased

\[ X = \text{Consumer Deceased} \]

Month 1:
- Base ECOA for Benjamin = 2
- J1 ECOA for Janice = 2
- J2 ECOA for Mary = 3

Month 2:
- Base ECOA for Benjamin = 2
- J1 ECOA for Janice = 2
- J2 ECOA for Mary = X

Month 3:
- Base ECOA for Benjamin = 2
- J1 ECOA for Janice = 2
Z = Delete Consumer

- The entire account is deleted for this consumer.
- Only report ECOA Z if the consumer was reported in error.
Deleting Inaccurate Information

ECOA Z
Deletes only associated borrower from the account.

Account Status DA
Deletes entire account and all associated borrowers.
Delete Consumer

Month 1:
- Base ECOA for Paulo = 2
- J1 ECOA for Tina = 2

Month 2:
- Base ECOA for Paulo = 1
- J1 ECOA for Tina = Z

Month 3:
- Base ECOA for Paulo = 1
T, X and Z

- Each of these ECOA Codes has a specific purpose.

- ECOA Codes T, X and Z are not interchangeable.
ECOA Codes

W = Business/Commercial

- Base Segment contains consumer name with applicable ECOA Code. (Consumer must be personally liable.)

- J2 Segment contains business name with ECOA W.
ECOA Codes
Common Questions

- Should I report ECOA Code ‘Z’ to remove a borrower when he or she is no longer participating on an account?
  - No. Report ECOA Code ‘T’ to terminate the borrower’s association.
  - Previous account history is retained when the ‘T’ is reported.
If both borrowers on a joint account are contractually responsible (ECOA 2), which one do I report in the Base Segment?

Either one!
Credit Reporting Resource Guide®

Website:
www.cdiaonline.org/data.cfm
Thank you for your interest!

Questions can be submitted to the CDIA Metro 2® Format Task Force through CDIA at:

metro2info@cdiaonline.org