

COVID-19 and Credit Reporting Resources

COVID-19 has had a devastating human and economic toll on the World and the United States has suffered as much or more than many other countries. Thankfully the American governments (Federal, State and local) and Industries have made steps to soften the blow as much as possible. We hope the following resources help you in these very trouble times.

NCRA COVID-19 Slide Deck

March 13, 2020 – President Declaration of Emergency

https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/

March 20, 2020 - The Department of Housing and Urban Development (HUD) issued guidance for mortgage services, landlords, and property managers creating a foreclosure and eviction moratorium. https://www.hud.gov/sites/dfiles/Main/documents/sec184 letter 032020.pdf many states and local municipalities have also issued similar ordinances providing consumers relief from being unable to pay your mortgage or rent during the pandemic.

The full HUD COVID-19 site is at: https://www.hud.gov/coronavirus and is complete with links to many other helpful

March 22, 2020 - Interagency statement on loan modifications and reporting for financial institutions from five key Federal agencies and state regulators https://files.consumerfinance.gov/f/documents/cfpb_interagency-statement_payment-obligations-covid19.pdf

March 27, 2020 – Congress passes and President Trump signs the CARES Act https://www.congress.gov/bill/116th-congress/senate-bill/3548/text?q=product+actualizaci%C3%B3n

Section 4021 of the CARES Act amends the Federal Fair Credit Reporting Act (FCRA) so that furnishers of information to credit reporting agencies who agree to account forbearance, or agree to modified payments with respect to an obligation or account of a consumer that has been impacted by COVID-19, report such obligation or account as "current" or as the status reported prior to the accommodation during the period of accommodation unless the consumer becomes current. This applies only to accounts for which the consumer has fulfilled requirements pursuant to the forbearance or modified payment agreement. Such credit protection is available beginning January 31, 2020 and ends at the later of 120 days after enactment or 120 days after the date the national emergency declaration related to the coronavirus is terminated. When properly reported these accounts will be calculated in a "neutral" fashion by both FICO and VantageScore to have no adverse effect from COVID-19 on the credit score.

To help mortgage servicers explain the COVID-19 payment options, Fannie Mae and Freddie Mac published scripts that should guide how servicers of loans backed by those two Enterprises in their communications with homeowners. Those scripts are at: Fannie's script for servicers and Freddie's script for servicers.

The Federal Housing Authority's published flexible communication policies for forbearance and also making the FHA partial claims process the primary means of post-forbearance loss mitigation/loan modification for those who have recovered from COVID-19 hardships.

FHA's Mortgagee letter 2020-06

The Consumer Financial Protection Agency (CFPB) issued guidance on April 1, 2020 https://files.consumerfinance.gov/f/documents/cfpb_credit-reporting-policy-statement_cares-act_2020-04.pdf that provided CARES Act instructions.

The Senate Banking Committee also has great information about these issues at: https://www.banking.senate.gov/imo/media/doc/CARES%20Act%20Housing%20Summary%20-%204%2013%202020.pdf .

WARNING - Scammers and con artists who are scheming on ways to separate you from your CARES Act stimulus money or any other funds they can get from you. COVID-19 scams are so rampant right now the FTC has a full site dedicated to trying to protect people from further harm: https://www.consumer.ftc.gov/features/coronavirus-scams-what-ftc-doing

Additional COVID-19 Resources:

CFPB https://www.consumerfinance.gov/coronavirus/

https://www.consumerfinance.gov/about-us/blog/protecting-your-credit-during-coronavirus-pandemic/

FTC https://www.ftc.gov/coronavirus

TransUnion https://www.transunion.com/blog/credit-advice/managing-credit-through-financial-hardship

Equifax https://www.equifax.com/about-equifax/covid-19-and-your-credit-score/

Experian https://www.experian.com/blogs/ask-experian/coronavirus-and-your-credit-report/

CDIA Metro2 https://cdia-news.s3.amazonaws.com/CDIA+Disaster+Notice 3-9-2020.pdf

FICO https://www.fico.com/en/covid-19

VantageScore https://www.vantagescore.com/news-story/339/vantagescore-statement-advising-scoring-options-those-impact

To ensure proper credit reporting documentation with the CARES Act and specific guidance in the Metro 2® reporting please review your credit reporting policies with whichever credit bureaus you report to (see the above links) and your legal and/or compliance teams.

Please stay safe, protect yourself, your family, and co-workers from the impact of this world-wide health crisis!