



Examples Related to Metro 2® Post Accommodation Reporting under CARES Act

Since the start of the COVID-19 pandemic, the Consumer Data Industry Association (CDIA) and our consumer reporting agency (CRA) members have provided guidance to assist furnishers as they navigate various complexities in credit reporting under the CARES Act amendments to the Fair Credit Reporting Act (FCRA). Most notably, there has been new and expanded guidance for reporting by data furnishers to CRAs in the Metro 2® Format. For a complete list of the CARES Act Reporting guidance, please [click here](#) and for the COVID-19 Post-Accommodation Reporting Guidance [click here](#).

CDIA has issued new and helpful examples to guide data furnishers in post-accommodation reporting in ways that are consistent with the CARES Act and the [FAQs issued by the Consumer Financial Protection Bureau \(CFPB\)](#).

The two examples provided illustrate how the days of delinquency can be counted for credit reporting purposes in two scenarios:

(1) the account is current at the time the forbearance is granted, the account is placed in a 180-day forbearance, borrower makes no payments during the forbearance period, and the borrower fails to make plans to resolve the forborne payments either before or after the forbearance period ends; and

(2) the account is delinquent at the time the forbearance is granted, the account placed in a 180-day forbearance, the forbearance does not cure the missed payments, borrower makes no payments during the forbearance period, and the borrower fails to make plans to resolve the forborne payments either before or after the forbearance ends.

The new, additional examples provided to data furnishers illustrate how the days of delinquency can be counted for credit reporting purposes. These illustrative examples focus on forbearance programs when no payments are due for a period of time and when the borrower must take additional action to determine how the forborne payments will be handled at the end of the forbearance period. For example, repayment plans, loan modifications, deferrals to maturity or payoff, lump sum payments at the end of forbearance, or other non-home retention solution).

The dates used are hypotheticals and do not reflect any specific legal requirements or specific agency program. Furnishers may use different dates that may slightly change the calculations of the number of days delinquent. For federal mortgage forbearances extended under the CARES Act, furnishers may consider the number of days payments that were late, if any, at the time the forbearance was granted or effective and the number of days delinquent after the forbearance ended if the consumer failed to reach a workout agreement with the furnisher.

These examples are not intended to be legal advice. Data furnishers are encouraged to review their accommodation programs and related furnisher credit reporting policies and procedures with their legal and compliance teams.

Date of Forbearance Request	Last due date for which a payment was made before forbearance request	Number of days past the due date at the time forbearance granted (For purposes of this example, date granted = date requested)	Effective date of forbearance (For purposes of this example, first payment not required after forbearance granted)	Length of Forbearance (For purposes of this example, forbearance calculated in number of days)	Date Forbearance ended (Example assumes forbearance was granted for a number of days, beginning with the effective date of forbearance)	First payment due date after forbearance ends*	Date of Account Information (Field 24)	Date of Last Payment (Field 27)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
Example #1 Account not delinquent at time of forbearance request, but no payment made after forbearance ended											
4/15/2020	4/1/2020	0 Borrower current because all payments due before forbearance requested were satisfied	5/1/2020	180 days	10/28/2020 (5/1/2020 + 180 days) <i>(Note that if furnisher uses the date granted as the start date, the forbearance in this example would end on 10/12/2020)</i>	11/1/2020	10/31/2020	4/1/2020	0 Because as of 10/31/2020, the first payment due following end of forbearance was not yet due	11 Current Account 0–29 days past the due date	Zero fill
						11/1/2020	11/30/2020	4/1/2020	29 Because as of 11/30/2020, the payment due on 11/1/2020 was not made	11 Current Account 0–29 days past the due date	Zero fill
						11/1/2020	12/31/2020	4/1/2020	60 Because as of 12/31/2020, the payment due on 11/1/2020 was 60 days delinquent	78 Account 60–89 days past the due date	12/1/2020

Date of Forbearance Request	Last due date for which a payment was made before forbearance request	Number of days past the due date at the time forbearance granted (For purposes of this example, date granted = date requested)	Effective date of forbearance (For purposes of this example, first payment not required after forbearance granted)	Length of Forbearance (For purposes of this example, forbearance calculated in number of days)	Date Forbearance ended (Example assumes forbearance was granted for a number of days, beginning with the effective date of forbearance)	First payment due date after forbearance ends*	Date of Account Information (Field 24)	Date of Last Payment (Field 27)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
Example #2 Account delinquent at time of forbearance request, and no payment made after forbearance ended											
4/15/2020	2/1/2020	45 Borrower missed the 3/1/2020 and the 4/1/2020 payments and by 4/15/2020, the 3/1/2020 payment was 45 days past due. The borrower's account would have been reported with account status 71 (30-59 days delinquent) as of 3/31/2020 because the 3/1/2020 payment was 30 days delinquent	5/1/2020	180 days	10/28/2020 <i>(Note that if the furnisher uses the date granted as the start date, the forbearance in this example would end on 10/12/2020)</i>	11/1/2020	10/31/2020	2/1/2020	48 Account was 45 days delinquent when forbearance was granted and 3 additional days delinquent as of 10/31/2020 (DOAI) because forbearance ended on 10/28/2020 <i>(Note that in this example the date the forbearance was granted was used because when the account was reported on 4/30/2020, the account status would have been held at status 71 because the forbearance was granted on 4/15/2020 and the delinquency count would not have advanced)</i>	71 Account 30 - 59 days past the due date <i>(Note that this is the same status that would have been reported as of 3/31/2020)</i>	3/2/2020 The 2/1/2020 payment was 30 days past due as on 3/2/202; the forbearance did not cure the delinquency and no payments were made during the forbearance period.

Date of Forbearance Request	Last due date for which a payment was made before forbearance request	Number of days past the due date at the time forbearance granted (For purposes of this example, date granted = date requested)	Effective date of forbearance (For purposes of this example, first payment not required after forbearance granted)	Length of Forbearance (For purposes of this example, forbearance calculated in number of days)	Date Forbearance ended (Example assumes forbearance was granted for a number of days, beginning with the effective date of forbearance)	First payment due date after forbearance ends*	Date of Account Information (Field 24)	Date of Last Payment (Field 27)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
						11/1/2020	11/30/2020	2/1/2020	78 Account was 45 days delinquent when forbearance was granted and 33 additional days delinquent as of 11/30/2020 (DOAI) because forbearance ended on 10/28/2020 and no payments were made (i.e., 45 days pre-forbearance plus 33 days post-forbearance)	78 Account 60-89 days past the due date	3/2/2020
						11/1/2020	12/31/2020	2/1/2020	109 Account was 45 days delinquent when forbearance was granted and 64 additional days delinquent as of 12/31/2020 (DOAI) because forbearance ended on 10/28/2021 and no payments were made (i.e., 45 days pre-forbearance plus 64 days post-forbearance)	80 Account 90 – 119 days past the due date	3/2/2020

* The amount of the payment that is due on the “payment due” will depend upon the agreement between the borrower and the furnisher.