CONSUMER DATA INDUSTRY ASSOCIATION

## CARES Act Reporting Guidelines

## KEY NOTES

We are providing the following information for your convenience and to assist you with reporting in accordance with the CARES Act. The purpose of this material is to provide guidance in Metro $2^{\circledR}$ reporting. This information is not intended to be legal advice. Please review your reporting policies with your legal and compliance teams.

We recommend that you do not suppress or suspend reporting your entire portfolio or delinquent accounts.
It is also important to remember that you should not update the Accommodation Payment History Profile entries post the Accommodation period.

## Furnisher - CARES Act Reporting

- Report the following Base Segment fields as specified if the account was current prior to the Accommodation period:
- Highest Credit or Original Loan Amount = the total amount borrowed
- Credit Limit = assigned Credit Limit for the account
- Scheduled Monthly Payment Amount = zero
- Account Status Code = 11 (Current account)
- Payment History Profile (report All prior history)
- Report value 0 for the months during the Accommodation period
- As an option, increment the Payment History Profile with value D during the Accommodation period
- Current Balance = outstanding balance amount
- Amount Past Due = zero
- For all other Metro $2^{\circledR}$ fields, the standard guidelines described within the Field Definitions module of the CRRG ${ }^{\circledR}$ should be followed.
- Report the following Base Segment fields as specified if the account was delinquent prior to the Accommodation period:
- Highest Credit or Original Loan Amount = the total amount borrowed
- Credit Limit = assigned Credit Limit for the account
- Scheduled Monthly Payment Amount = zero
- Account Status Code = Delinquency Status 71-84 as reported prior to the Accommodation period (example 30-day delinquency prior to the period remains a 30-day delinquency throughout the Accommodation period)
- Payment History Profile (report ALL prior history)
- Report appropriate code that specifies the previous month's Account Status for each month the account is in the Accommodation period
- As an option, increment the Payment History Profile with value D during the Accommodation period
- Current Balance = outstanding balance amount
- Amount Past Due = APD as reported prior to the accommodation period
- For all other Metro $2^{\circledR}$ fields, the standard guidelines described within the Field Definitions module of the CRRG ${ }^{\circledR}$ should be followed
- Report the following Base Segment fields as specified if the account is brought current during the Accommodation period:
- Highest Credit or Original Loan Amount = the total amount borrowed
- Credit Limit = assigned Credit Limit for the account
- Scheduled Monthly Payment Amount = zero
- Account Status Code = 11 (Current account) or 13 (Paid account)
- Payment History Profile (report All prior history)
- Report appropriate code that specifies the previous month's Account Status for each month the account is in the Accommodation period
- As an option, increment the Payment History Profile with value D during the Accommodation period
- Current Balance = outstanding balance amount OR zero if Paid
- Amount Past Due = zero
- For all other Metro $2^{\circledR}$ fields, the standard guidelines described within the Field Definitions module of the CRRG ${ }^{\circledR}$ should be followed

If furnishers elect to utilize the Metro $2^{\circledR}$ FAQ 44 (Deferred), FAQ 45 (Forbearance) or FAQ 58 (Natural Disaster), they should do so in accordance with the CARES Act amendment to the FCRA as outlined above.

