

4/8/2015



Michael Brown  
National Director of Collections  
Parking and Mobility Solutions

Xerox Local Government  
Transportation Group  
9913 Chiles Court  
St. Louis, MO 63126

michael.brown6@xerox.com  
tel 314.221.4211

Donzell Gipson  
City of Dallas Police Department  
1400 S Lamar Street  
Dallas, TX 75215

Dear Donzell:

On March 9, 2015, the three major credit reporting agencies (CRAs) - Experian, Equifax and TransUnion - launched the National Consumer Assistance Plan to enhance credit reporting accuracy and the consumer experience. This plan was announced in cooperation with the State of New York's Attorney General Eric Schneiderman.

The highlights of the plan are as follows:

#### National Consumer Assistance Plan Highlights

- Consumer experience:
  - Consumers visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), the website that allows consumers to obtain a free credit report once a year, will see expanded educational material.
  - Consumers who obtain their free annual credit report, and dispute information resulting in modification of the disputed item, will be able to obtain another free annual report without waiting a year.
  - Consumers who dispute items on their credit reports will receive additional information from the credit bureaus along with the results of their dispute, including a description of what they can do if they are not satisfied with the outcome of their dispute.
  - The CRAs are focusing on an enhanced dispute resolution process for consumers that are proven victims of identity theft and fraud, as well as those involved in mixed file situations.
  
- Data accuracy and quality:
  - Medical debts won't be reported until after a 180-day "waiting period" to allow insurance payments to be applied. The CRAs will also remove from credit reports previously reported medical collections that have been or are being paid by insurance.
  - Consistent standards will be reinforced by the credit bureaus to entities that submit data for inclusion in a credit report (data furnishers).
  - Data furnishers will be prohibited from reporting authorized users without a date of birth and the CRAs will reject data that does not comply with this requirement.
  - *The CRAs will eliminate the reporting of debts that did not arise from a contract or agreement by the consumer to pay, such as tickets or fines.* [emphasis added]
  - A multi-company working group will be formed to regularly review and help ensure consistency and uniformity in the data submitted by data furnishers for inclusion in a consumer's credit report.

As outlined in the fourth bullet point under Data accuracy and quality (italicized and underlined above), the credit bureaus will no longer report governmental fees and fines or other transactions that do not arise

from a contract or agreement where the consumer agrees to the duty to pay. This means that Xerox, if reporting under our LDC Collection Systems subscriber code, or any reporting done by Xerox, or directly by a City via the City's subscriber code, for fees and fines debt will be rejected and any existing credit bureau records will be deleted.

Experian has already submitted cease and desist notification to Xerox for all credit reporting transactions listed as unacceptable data. This list is identified below:

- Fines and Fees
  - Examples include but are not limited to:
    - Towing Charges
    - Vehicle Storage Fees
    - Parking and Traffic Tickets/Fines
    - Toll Road Fines/Fees
    - Ordinance Violations
    - Library Fines
    - Video Rental Fees
    - Prequalification Fees
    - Brokerage Fees
    - Eviction Fees
- Continuity Clubs
  - Examples include but are not limited to:
    - Health Club Dues
    - Karate Club/Martial Arts Dues
    - Magazine Subscriptions
    - DVD/Book Club Fees
- Pre-Paid Debit/Gift Cards
- Checking/Savings Account Activity/Balances
- Home Owners' Association (HOA) Dues
- Child Support Enforcement Data from Non-Government Entities
- Tribal loans not compliant with federal and state lending laws
- Unpaid Taxes\*\*
- Unacceptable Data by Industry Type
  - Bail Bonds Companies
  - Check Cashing Companies
  - Pay Day Loan Companies

*\*\* Data that is reflected in a public record (such as tax liens, civil court judgments, bankruptcy petitions, etc.) will not be accepted by Experian from its subscribers. Experian uses a vendor to gather such information directly from the public records.*

TransUnion is expected to present their cease and desist notification in the future (sometime within the next seventeen months). Equifax did not accept fees and fines debt prior to this plan announcement.

Based upon the above information, your Xerox program manager will be working with you and your team to review the following:

- Contract implications
- Revenue impact
- Alternative enforcement measures
- Communication plans



If you have any questions regarding this change in reporting qualification, please feel free to reach out to me directly at 314-221-4211.

Sincerely,

A handwritten signature in black ink, appearing to read "M D Brown", followed by a long horizontal line extending to the right.

Michael D Brown  
National Director of Collections  
Xerox Local Government Transportation Group

# Furnisher Data Reporting and Process Requirement Changes

## To All Data Furnishers March 2016

### National Consumer Assistance Plan

Last year, Equifax, Experian and TransUnion announced the National Consumer Assistance Plan to enhance their ability to collect complete and accurate consumer information and provide consumers more transparency when interacting with consumer reporting agencies about their credit reports. The plan was announced after cooperative discussions and an agreement with the Attorneys General of multiple states.

### Impact of the Plan

The agreement provides for updates to mandatory data reporting requirements and data collection procedures. The resulting initiatives will impact Data Furnisher reporting. *The requirements listed are in addition to reporting requirements of any individual CRA.*

### Initiatives

Below is a summary of upcoming initiatives, impacted furnishers, and the Effective Dates. **You should implement these data reporting changes in advance of the Effective Dates.** Details of each initiative are provided on pages 3 and 4:

Who is Impacted?	What is Required?	Effective Date
Collection Agencies and Debt Buyers	Report the name of the Original Creditor and Creditor Classification Code	6/15/2016
Collection Agencies and Debt Buyers	Do not report debt that did not arise from a contract or agreement to pay	6/15/2016
Collection Agencies and Debt Buyers	Report a full file monthly	9/1/2016
Collection Agencies and Debt Buyers	Do not report Medical Debt collection accounts less than 180 days old	9/15/2017
Collection Agencies and Debt Buyers	Report a delete for accounts that are being paid or were paid in full through insurance	9/15/2017
All Data Furnishers	Report using the newly established minimum reporting requirements for consumer personally identifiable information	9/15/2017
Reporters of Authorized User Data	Report full Date of Birth for new Authorized Users on all accounts	9/15/2017

*Continued on next page*

## Furnisher Data Reporting and Process Requirement Changes, Continued

---

### Recommended Action

It is **strongly advised** that all Data Furnishers:

- Review the list of initiatives and the details that follow to understand which changes will affect you.
  - Forward this communication within your organizations in order to disseminate the requirements widely (Technology, Compliance, Operations, etc.).
  - Ensure that your organizations successfully implement these initiatives in all affected systems and departments **on or before the Effective Dates listed above.**
  - Monitor your data on an ongoing basis to ensure these requirements are met.
- 

### Questions?

Additional communications will be provided on this transition effort as they become available. Should you have any questions, please contact:

**Equifax:** [EquifaxConsumer.DataOperation@Equifax.com](mailto:EquifaxConsumer.DataOperation@Equifax.com)

**Experian:** [DataReporting@experian.com](mailto:DataReporting@experian.com)

**TransUnion:** [TUDAS@TransUnion.com](mailto:TUDAS@TransUnion.com)

**EQUIFAX**<sup>®</sup>

 Experian

TransUnion<sup>®</sup>

---

## Initiative Details by Furnisher

---

### Collection Agencies/Debt Buyers

Initiative	Furnisher Action	Effective Date
Report the name of the Original Creditor and Creditor Classification Code	Report the Original Creditor Name and the valid Creditor Classification Code according to the Metro 2® format. These fields are required for each account or item reported.	6/15/2016
Do not report debt that did not arise from a contract or agreement to pay	Do not report debt that did not arise from a contract or agreement to pay, including, but not limited to, certain fines, tickets, and other assessments. For example, library fees or fines, parking tickets, speeding tickets, and court fees or fines.	6/15/2016
Report a full file monthly	To avoid potential deletion of data by the CRAs, you must report your full file monthly including accounts that are open, that are paid in the last 90 days, or that require deletion or correction.	9/1/2016
Do not report Medical Debt collection accounts less than 180 days old	Do not report Medical Debt collection accounts (as defined by Creditor Classification Code 02) until they are at least 180 days past the Date of the First Delinquency with the original creditor that led to the account being sold or placed for collection.	9/15/2017
Remove Debt paid or being paid by insurance	Report a delete for accounts that are being paid by insurance or were paid in full through insurance (not by the consumer).	9/15/2017

---

*Continued on next page*

## Initiative Details by Furnisher, Continued

### All Data Furnishers

Initiative	Furnisher Notice	Effective Date
Reporting of consumer personally identifiable information	<p>A new minimum standard has been established to expand the CRAs' capabilities to match credit data to the file of the appropriate consumer.</p> <p>Furnishers of newly opened trade and collection data must report the full name (First, Middle, Last Name and Generation Code/Suffix), address, full Social Security Number and Date of Birth (mmddyyyy).</p> <p>If full Social Security Number is not available, full Date of Birth (mmddyyyy) will be required.</p> <p>This new minimum standard will apply to <u>accounts reported with a Date Opened after the Effective Date</u> in order for the CRAs to accept these records for processing.</p> <p>Data will be monitored to ensure these requirements are met.</p>	9/15/2017

### Reporters of Authorized User Data

Initiative	Furnisher Action	Effective Date
Report full Date of Birth for new Authorized Users on all accounts	Report the full Date of Birth (month, day, and year - MMDDYYYY) for newly added authorized users (EOA "3") on ALL pre-existing and newly opened accounts.	9/15/2017

#### Questions?

Additional communications will be provided on this transition effort as they become available. Should you have any questions, please contact:

Equifax: [EquifaxConsumer.DataOperation@Equifax.com](mailto:EquifaxConsumer.DataOperation@Equifax.com)

Experian: [DataReporting@experian.com](mailto:DataReporting@experian.com)

TransUnion: [TUDAS@TransUnion.com](mailto:TUDAS@TransUnion.com)

