Helping Consumers Avoid Credit Problems if They Have Been Impacted by Coronavirus (COVID-19)

Overview

Questions come up about the impact of the spread of Coronavirus has on consumers’ credit histories. The Consumer Data Industry Association (“CDIA”) and its credit bureau members have answers. For years, the credit bureaus have had systems in place to minimize or eliminate the negative credit impact of the extreme events, like a natural disaster, or a pandemic.

Consumers who have been impacted (directly or indirectly) by Coronavirus are strongly encouraged to contact their lenders and creditors. Lenders and creditors have programs and plans to assist their customers in a time of a financial crisis, like a pandemic. Lenders and creditors typically offer forbearance or deferred payments programs for their customers who need help. In many cases, a consumer will be reported as “paid as agreed”.

Consumers should contact their lenders and creditors first

If a consumer is impacted (directly or indirectly) by Coronavirus, the very first thing that consumer should do is contact his or her lender or creditor. Lenders and creditors have a variety of tools in place to help consumers, but these institutions can help only if they know that there is a problem. Lenders and creditors may defer payments or place consumers into forbearance programs. Five federal and state regulators have encouraged financial institutions to work with consumers during this public health emergency.1

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1 On March 10, 2020 five federal financial institution regulators and state regulators issued a joint statement “encouraging financial institutions to meet the financial needs of customers and members affected by the coronavirus.” These five agencies (the Board of Governors of the Federal Reserve System, the Consumer Financial Protection Bureau, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, and the Conference of State Bank Supervisors) “recognize the potential impact of the coronavirus on [consumers].” These agencies encourage “financial institutions to work constructively with borrowers and other customers in affected communities. Prudent efforts that are consistent with safe and sound lending practices should not be subject to examiner criticism.”
For the many consumers that have mortgages, Fannie Mae and Freddie Mac have reminded mortgage services that “hardship forbearance is an option for borrowers who are unable to make their monthly mortgage payment.”

The largest bank in the U.S., Citi, told its customers that a “range of assistance measures include fee waivers, hardship programs and small business.”

When a consumer is placed in a forbearance plan, a deferred payment plan, or some other special abatement program, credit reporting codes have been created by the credit bureaus to make sure that the consumer’s credit is not treated negatively.

*Reporting to the credit bureaus*

CDIA has guidance for the approximately 15,000 lenders and creditors who report data to the nationwide credit bureaus to handle a wide variety of data reporting scenarios. CDIA and our credit bureau members are doing our part to help consumers who have been impacted (directly or indirectly) by Coronavirus. To help lenders and creditors offer help consumers affected by Coronavirus, CDIA has guidance for lenders and creditors who put an account either (a) into forbearance as a result of a consumer’s inability to make payments due to natural or declared disasters, or for other national crises, or (b) into a deferred payment status.

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These five agencies are the Federal Reserve (“FRB”), the Conference of State Bank Supervisors (“CSBS”), the Consumer Financial Protection Bureau (“CFPB”), the Federal Deposit Insurance Corporation (“FDIC”), the National Credit Union Administration (“NCUA”), and the Office of the Comptroller of the Currency (“OCC”).

3 Website, Citi, *Citi Assists U.S. Customers and Small Businesses Impacted by COVID-19*, March 6, 2020.
The country’s leading score developers, VantageScore and FICO note that forbearance and deferred payment scenarios have a neutral impact on a consumer’s credit score so consumers in one of these programs, as reported to the nationwide credit bureaus, should have no negative impact as a result of Coronavirus.

**Low or no credit score impact**

FICO noted that when a consumer is in forbearance, if, for example, because a consumer “is experiencing temporary financial difficulty. The consumer may be making reduced payments, interest-only payments or no payments. FICO® Scores do not [count] the fact that a loan is in forbearance. Therefore, the fact that a loan moved into forbearance would not impact the score.” VantageScore makes clear that “[a] loan placed in a deferred payment or forbearance plan will not result in a negative impact.” The same is true for a natural disaster coding: “[t]he net impact is that a consumer’s VantageScore credit score will not go down, either because negative information is neutralized because of the natural disaster code or because the account is completely removed.”

**Conclusion**

Questions come up about the impact of the spread of Coronavirus has on consumers’ credit histories. CDIA and its credit bureau members have answers. For years, the credit bureaus have had systems in place to minimize or eliminate the negative credit impact of the extreme events, like a natural disaster, or a pandemic.

Consumers who have been impacted (directly or indirectly) by Coronavirus are strongly encouraged to contact their lenders and creditors. This is the advice banks and bank regulators have given. Lenders and creditors have programs and plans to assist their customers in a time of a financial crisis, like a pandemic. Lenders and creditors typically offer forbearance or deferred payments programs for their customers who need help. In many cases, a consumer will be reported as “paid as agreed”. Yet, the only way a consumer

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5 VantageScore Website, [VantageScore statement advising on scoring options for those impacted by COVID-19 (Coronavirus)](https://ficoscore.com/wp-content/uploads/Frequently-Asked-Questions-About-FICO-Scores.pdf). VantageScore notes that when a loan is in a deferred payment for forbearance, that loan “will continue to positively impact one’s credit history and credit score, while the related balance and payment obligations under the plan will not be considered for purposes of a credit score calculation during the forbearance period. The net impact to a consumer’s VantageScore credit score is ‘set to neutral,’ so the consumer’s credit score is not harmed.
6 Id.
can get they help she deserves is by asking for help from their lenders and creditors. Asking for help should be the first call or the first click.

Key terms

- A **deferred payment** is a loan arrangement in which the borrower is allowed to start making payments at some specified time in the future.
- **Forbearance** is a period during repayment in which a borrower is permitted to temporarily postpone making regular monthly payments. The debt is not forgiven, but regular payments are suspended until a later time. As an example, forbearance may be granted if a borrower is experiencing temporary financial difficulty. The consumer may be making reduced payments, interest-only payments or no payments.

Additional resources

- Equifax: [COVID-19 (Coronavirus) and Your Credit Score](https://www.equifax.com/coronavirus)  
- Experian: [COVID-19 (Coronavirus) and Your Credit Report](https://www.experian.com/coronavirus)  
- TransUnion: [Managing Your Credit Through a Financial Hardship](https://www.transunion.com/coronavirus)  
- VantageScore: [VantageScore statement on scoring options for those impacted by COVID-19 (Coronavirus)](https://www.vantagescore.com/coronavirus)

About the Consumer Data Industry Association

The Consumer Data Industry Association (CDIA) is the voice of the consumer reporting industry, representing consumer reporting agencies including the nationwide credit bureaus, regional and specialized credit bureaus, background check and residential screening companies, and others. Founded in 1906, CDIA promotes the responsible use of consumer data to help consumers achieve their financial goals, and to help businesses, governments and volunteer organizations avoid fraud and manage risk. Through data and analytics, CDIA members empower economic opportunity all over the world, helping ensure fair and safe transactions for consumers, facilitating competition and expanding consumers' access to financial and other products suited to their unique needs. Find us online at [www.cdiaonline.org](http://www.cdiaonline.org).

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