



CBR Compliance and Enhancements

Technical Reference

Last updated March 8, 2018

(See [Change Log](#) for a summary of changes to this document since its initial release.)

Abstract

This document outlines the system changes to support the new 2016 credit bureau reporting requirements. It also provides release information for enhancements to credit reporting functionality.

For copyright and trademark information, see

https://help.genesys.com/latitude/10/Copyright_and_Trademark_Information.htm.

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Introduction to CBR Compliance and Enhancements

Latitude by Genesys completed system changes to support the new 2016 credit bureau reporting requirements. Latitude by Genesys also completed enhancements to credit reporting functionality.

Important!

If you are a Latitude 8.3 client, download and apply the required files located on the **Utilities and Downloads** page at <https://my.inin.com/products/Latitude83/Pages/Utilities-Downloads.aspx>. Complete the upgrade instructions provided in [Latitude 8.3 Upgrade Instructions](#).

Latitude 8.3 Upgrade Instructions

Complete the following steps to upgrade your Latitude 8.3 system to include the latest credit bureau reporting requirements and enhancements:

1. Back up the Target database after the end of cycle and after generating the report.
2. If possible, restore the backup as a copy.
3. Run the CBR_DB_UPDATE_83320_TO_1st_Party_Cider.sql upgrade script.
4. Copy the Latitude.Metro2.dll and CBRUtilityPanel.dll overlay files to the Latitude installation Bin directory (for example, c:\\Program Files X86\\).
5. Run the evaluation and review the results. Use the "re-evaluate" option when running the evaluation after any upgrade.

```
execute cbrevalatebulk null,'y','n',1
```

6. Review the data.
7. Run the Credit Bureau Reporting Wizard and review the report.

Latitude 8.3 data clean-up

As part of the evaluation process, the system identifies all reported active accounts that don't have a valid contract-to-pay configuration and generates exceptions for those accounts. If there are exceptions, you can run the following sample query to delete or modify the accounts accordingly.

```
with xacct as
```

```
(select * from CbrReportExceptionsDtl where CbrException = 'InvalidContractToPay'),
```

```
reports as
```

```
(select * from CbrAccountHistory(null) where AccountStatus not in ('DA','DF','62','64')),
```

```
updateset as
```

```
(Select AccountID from reports inner join xaccts on number = AccountID)
```

```
update master
```

```
set specialnote = 'DA'
```

```
where number in (select AccountID from updateset);
```

The query updates each of these accounts to report a forced "DA" to credit bureaus the next time you run the Credit Bureau Reporting Wizard. If applicable, the query also updates the contract date on the respective master account row.

Collection Agency and Debt Buyer Requirements

Following are the 2016 requirements for collection agencies and debt buyers.

- Report the Original Creditor Name and the valid Creditor Classification Code for each account or item reported according to the Metro 2 format. (06/15/2016)

Now required for first- and third-party reporters. The system raises an exception when one or both data items are missing.

- Report your entire file monthly, including accounts that are open, paid in the last 90 days, or require deletion or correction. (9/1/2016)
- 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 First Delinquency. (9/15/2017)

The system screens accounts using the delinquency date and creditor class and generates exceptions for accounts that are under the minimum number of days.

- Do not report debt that didn't arise from a contract or agreement to pay (including, certain fines, tickets, and other assessments). (6/15/2016)

The system reports all medical accounts with a "02" Creditor Classification Code, regardless of the contract date. The system creates an exception of "non-valid contract-to-pay debt" for all government accounts with a "04" Creditor Classification Code. All other accounts require a valid contract date to report the account. For a list of Creditor Classification Codes, see [Appendix A: Creditor Classification Codes](#).

CBR Evaluation Enhancements

CBR Evaluation Enhancements

The following enhancements are in addition to the 2016 requirements.

Minimum balance exclusion

The system compares the minimum balance required for reporting against the current principal bucket on the account. You can alter the test to use the current balance with the following caveats:

- The test is a one-time occurrence that filters the account on the current principal and the configured minimum balance allowed.
- Once reported, the account continues to report until finalized.
- The test doesn't cause exclusion of the account once reported.

CBR exceptions

- When a CBR exception excludes an account or debtor from reporting, the system removes the account from the pending file and adds it to the exceptions file.
- The system adds an audit record to the "cbr_audit" table to allow the **Work Form** to display the correct status.

MasterChargeOff table

Added "SpecialComment" and "ComplianceCondition" to the "MasterChargeOff" table. These columns allow for special case reporting of initial values for first-time reports. The system retains these values until the evaluation determines a different value. The system uses "SpecialComment" and "ConsumerInformationIndicator" in the "MasterChargeOff" table to report default first-report values passed from the host. This feature is for first-party clients, primarily.

Master.SpecialNote

Repurposed "SpecialNote" in the "master" table to provide DA and DF forced statuses.

- For first-party only, DA and DF accounts report accordingly, even if the account has never reported and is a new placement in Latitude. Clients now use "SpecialNote" to force a DA or DF on any account that has or hasn't reported previously.
- Added "UpdatedDate" to the bankruptcy update trigger to enhance tracking. Knowing the date of change for the bankruptcy row is critical in troubleshooting data concerning time issues.

CbrReportExceptions

Altered and enhanced this view.

CbrReportExceptionsDtl

Added "CbrReportExceptionsDtl" view to provide more details regarding exceptions.

cbrdataexceptionsdtl ()

Added "cbrdataexceptionsdtl ()" function to provide exception detail at the account level for a single account.

OutOfStatute

Changed Federal "OutOfStatute" timeframe based on delinquency date to trigger inclusive of the day that passes the seven-year range. The system doesn't report "OutOfStatute" accounts. This feature is available using the "cbrdictionary" table to allow the system to determine "OutOfStatute" from a time offset that prevents the account from reporting before the seven-year rule. Clients can now provide a time buffer for "OutOfStatute" (for example, 30 days) to prevent the account from reporting.

CBR Metro 2 history

The system assigns accounts not recorded in the "cbr_metro2_accounts" or "cbr_metro2_debtors" table a blank "TransactionType." This transaction type indicates a previously reported first-party account. Since the system evaluates charged-off accounts only, the system of record considers all accounts as previously reported.

First-party clients**First-party clients****DateTimeEntered**

For first-party clients, the system uses "DateTimeEntered" in the PayHistory table for cycle payment calculation for the current cycle, as well as the payment history profile. When the payment "DateTimeEntered" is greater than the last reported date, the payment qualifies for the cycle. If the account is reporting for the first time and the payment is within a 38-day window, the payment counts.

ActualPayment

"ActualPayment" only reflects transactions where "DateTimeEntered" is after the last reported date or within 38 days on accounts not reported for the current cycle. The system doesn't report reversals.

AmountPastDue

The system sets "AmountPastDue" and "CurrentBalance" to zero (0) for discharged, paid-off, and sold accounts.

CbrPrevent

The system sets the "CbrPrevent" flag on accounts that report as "DA" or "DF," or are sold ("PortfolioIndicator" is set to "2"). The system flags discharged bankruptcy, deceased primary debtor, and paid-in-full accounts after reporting. "GetNextMetro2" procedures exclude accounts flagged as

"CbrPrevent." The system only sets the "CbrPrevent" flag when the Credit Bureau Reporting Wizard finalizes the report.

Buyback

The system supports buyback reporting for sold AIM accounts.

Notes

The system provides more detailed notes for post history processing.

Reverse charge-off accounts

The system places reverse charge-off accounts into a status that has the "CbrReport" flag set to "False" to prevent evaluation and reporting of these accounts. If these accounts return to a charge-off state, they are subject to reporting again. The bridge is responsible for setting the proper status when accounts return to a charge-off state.

Metro 2 reporting process upgrade

Customers can upgrade the Metro 2 reporting process mid-cycle with greater accuracy.

- If the system evaluates and updates accounts after the last report to credit bureaus, the system reprocesses the accounts. Note the following exceptions:
 - Accounts with a status of "DA," "DF," or discharged bankruptcy that the system updated during the current cycle are subject to reporting on the first cycle reported after the upgrade. These accounts fall into the category of first-party reverse charge-off.
 - Customers can identify these accounts and delete their pending data ("cbr_accounts" and "cbr_debtors") before generating the next report. The system regenerates the accounts that qualify during the next evaluation.
- Customers can delete all pending "cbr_accounts" and "cbr_debtors" after upgrading. The evaluation regenerates the pending file. We don't recommend using this option but it is available by default. Instead, we recommend that customers delete only those pending accounts that are in question and then review the results before reporting.

BillingDate

"BillingDate" now corresponds to the date the account sold in "aim_ledger" and "lastpaiddate" for paid or settled.

Bankruptcy accounts

The system appends a "D" to "paymenthistoryprofile" for bankruptcy accounts that are in a filed status for the period beginning with the date filed through the cycle end date.

Dismissed bankruptcies

Customers can delete dismissed bankruptcies. This removal is a one-time report of a "Q" status to credit bureaus for the information indicator code. The system returns the account status to "Active 97" when removing and deleting the bankruptcy from the **Work Form**.

Payment history profile calculation

Enhanced the payment history profile calculation to meet Metro 2 standards for bankruptcy reporting.

Data capture

Added a table and procedure to capture data that is critical to the evaluation at cycle end, which the system populates when generating the CBR report to send to credit bureaus.

CbrDatafx function

New "cbrDatafx" function returns a table result set containing all relevant data that the CBR evaluation process uses. "cbrPostHistory" now has a procedure call to capture the data points just after generating the credit bureau report for the end of business cycle. The system uses the data to predict the number and type of accounts that will report for the current cycle. The "cbrAuditDataCapture" procedure truncates and stores the current cycle data. The "CBR_Data_Compare" procedure compares the cycle end data with the current data and reports any changes that would trigger a report during the current cycle at the current point in time. Use this procedure for troubleshooting and estimating existing accounts that will report. Data comparison depends on new CBR functions slated for Latitude but are compatible with previous versions to provide the current data set.

```

dbo.CbrDataCycleEnd

    [FileId]

    ,[CbrEnabled]

    ,[CbrPortfolioType]

    ,[CbrAccountType]

    ,[CbrMinBalance]

    ,[CbrWaitDays]

    ,[CbrCreditorClass]

    ,[CbrDefaultOriginalCreditor]

    ,[CbrUseAccountOriginalCreditor]

```

CBR Compliance and Enhancements Technical Reference

,[CbrUseCustomerOriginalCreditor]
,[CbrPrincipalOnly]
,[CbrIncludeCodebtors]
,[CbrDeleteReturns]
,[CbrIndustryCode]
,[CbrCustomercode]
,[CbrCustomerid]
,[CbrCustomerName]
,[CbrCustomerCreditorClass]
,[CbrCustomerOriginalCreditor]
,[CbrParmAbbrev]
,[CbrValueLookup]
,[Customer]
,[number]
,[Status]
,[qlevel]
,[receiveddate]
,[DelinquencyDate]
,[OriginalPrincipal]
,[original]
,[CurrentPrincipal]
,[CurrentBalance]
,[lastpaid]
,[OriginalCreditor]

,[ContractDate]
,[ConsumerAccountNumber]
,[SettlementID]
,[soldportfolio]
,[purchasedportfolio]
,[lastpaidamt]
,[CLIDLDP]
,[specialnote]
,[cbrPrevent]
,[CbrOverride]
,[cbrextenddays]
,[PrvCbrException]
,[PersonalReceivership_Amortization]
,[StatusCbrReport]
,[StatusCbrDelete]
,[IsBankruptcy]
,[IsDeceased]
,[IsDisputed]
,[StatusIsPIF]
,[StatusIsSIF]
,[StatusIsFraud]
,[McoChargeoffnumber]
,[McoSecondaryAgencyIdentifier]
,[McoSecondaryAccountNumber]

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,[McoMortgageIdentificationNumber]

,[McoTermsDuration]

,[McoClosedDate]

,[McoChargeOffStatus]

,[McoChargeOffAmount]

,[McoPaymentHistoryProfile]

,[McoPaymentHistoryDate]

,[McoHighestCredit]

,[McoCreditLimit]

,[McoSpecialComment]

,[McoComplianceCondition]

,[portfolioid]

,[AimGroupSeller]

,[AimGroupBuyer]

,[PortfolioSoldDate]

,[debtornumber]

,[PrimaryDebtorID]

,[DebtorID]

,[Debtorseq]

,[Debtorname]

,[DebtorResponsible]

,[CbrExclude]

,[PrvDebtorExceptions]

,[IsBusiness]

,[DebtorSSN]
,[DebtorStreet1]
,[DebtorStreet2]
,[DebtorCity]
,[DebtorState]
,[DebtorZipCode]
,[IsAuthorizedAccountUser]
,[bankruptdebtorid]
,[bankruptchapter]
,[bankruptdateFiled]
,[bankruptdateNotice]
,[bankruptproofFiled]
,[bankruptdateTime341]
,[bankruptWithdrawnDate]
,[bankruptdischargeDate]
,[bankruptdismissalDate]
,[bankruptreaffirmDateFiled]
,[cccdebtorid]
,[CCCS]
,[PrimaryDebtorDispute]
,[datedeceased]
,[lastpaidnumber]
,[LastPaymentDate]
,[lastPaymentAmount]

,[payhistorydatepaid

,[DateCreated]

Appendix A: Creditor Classification Codes

The following table lists the creditor classification codes and their description.

| Classification Code | Creditor |
|---------------------|---------------------|
| 01 | Retail |
| 02 | Medical/Health Care |
| 03 | Oil Company |
| 04 | Government |
| 05 | Personal Services |
| 06 | Insurance |
| 07 | Educational |
| 08 | Banking |
| 09 | Rental/Leasing |
| 10 | Utilities |
| 11 | Cable/Cellular |
| 12 | Financial |
| 13 | Credit Union |
| 14 | Automotive |
| 15 | Check Guarantee |

Appendix B: Supporting Metro 2 Guidelines

Appendix B: Supporting Metro 2 Guidelines

The following Metro 2 guidelines, extracted from the Credit Reporting Resource Guide, support the CBR enhancements.

- [Payment History Profile – Base segment field](#)
- [Reporting scenarios](#)
- [Accounts included in bankruptcy](#)

Payment History Profile – Base segment field

Payment History Profile only reports for first-party charged-off accounts. The evaluation only applies “L,” “B,” and “D” codes.

| FIELD | FIELD NAME & DESCRIPTION | 426 Character Format | | |
|-------|--|----------------------|----------|---------------------|
| | | Length | Position | Recording Technique |
| 18 | <p>Payment History Profile</p> <p>Contains up to 24 months of consecutive payment activity for the previous 24 reporting periods prior to the Date of Account Information (Field 24) being reported. Report one month's payment history in each byte from the left to right in most recent to least recent order. The first byte should represent the Account Status Code reported in the previous reporting period. Refer to Exhibit 5 for examples of reporting payment history, which includes examples for month-end reporters, as well as examples for reporters who submit data on other days of the month (e.g., 1st, 15th, etc.). Values available:</p> <p>0 = 0 payments past due (current account) 1 = 30 - 59 days past due date 2 = 60 - 89 days past due date 3 = 90 - 119 days past due date 4 = 120 - 149 days past due date 5 = 150 - 179 days past due date 6 = 180 or more days past due date B = No payment history available prior to this time - either because the account was not open or because the payment history cannot be furnished. A "B" may not be embedded within other values. D = No payment history available this month. "D" may be embedded in the payment pattern. E = Zero balance and current account (Applies to Credit Cards and Lines of Credit) G = Collection H = Foreclosure Completed J = Voluntary Surrender K = Repossession L = Charge-off</p> <p>No other values are acceptable in this field.</p> <p>If a full 24 months of history are not available for reporting, the ending positions of this field should be B-filled.</p> <p>The Payment History Profile is intended to be used to report monthly history, regardless of the Terms Frequency.</p> <p>Reporting of the Payment History Profile provides a method for automated correction of erroneously reported history.</p> <p>For important information:</p> <ul style="list-style-type: none"> • Paid accounts - refer to Frequently Asked Question 41. • First-time reporters - refer to Frequently Asked Question 22. | 24 | 127-150 | AN |

Reporting scenarios

Purchased accounts – FAQ 48

48. Question: How should accounts that were purchased from another company be reported?

FAQ 48 (continued)

2. If the previous lender’s account history is being converted to the new lender’s system and the account history can be verified, report the following Base, K2 Segment and L1 Segment fields as specified:
 - Base Segment Identification Number = Identification Number reported by the previous lender
 - Base Segment Consumer Account Number = Account Number reported by the previous lender
 - Date Opened = date opened with the previous lender
 - Account Status Code = appropriate code that specifies the status of the account as of the Date of Account Information
 - Payment Rating = if applicable to the Account Status Code being reported
 - Payment History Profile = report payment history provided by the previous lender
 - Date of Account Information = follow the standard guidelines documented in Field 24

Note: Reporting by the purchaser should begin in the following month’s reporting period – **after** the seller reported the accounts as sold.
 - FCRA Compliance/Date of First Delinquency = if the account is delinquent or derogatory at the time of purchase, report the date of the first delinquency with the previous lender

Note: If the new lender is unable to obtain the **Date of First Delinquency with the original lender**, do not report the account.
 - K2 Segment Portfolio Indicator = **1** and Purchased Portfolio Name = name of the company from which the account was purchased
 - L1 Segment Change Indicator = **3**, New Consumer Account Number = new account number assigned by the new lender, and New Identification Number = internal code that specifies where information will be verified by the new lender

Note: Do not report purchased accounts that were included in discharged/completed Bankruptcies.

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Base segment fields – 16 and 26-29

| | | | | |
|----|--|---|---------|---|
| 16 | <p>Actual Payment Amount Report the dollar amount of the monthly payment actually received for this reporting period in whole dollars only.</p> <p>If multiple payments are made during the reporting period, the total amount should be reported.</p> | 9 | 115-123 | N |
|----|--|---|---------|---|

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| 4-10

| FIELD | FIELD NAME & DESCRIPTION | 426 Character Format | | |
|-------|---|----------------------|----------|---------------------|
| | | Length | Position | Recording Technique |
| 26 | <p>Date Closed For all portfolio types, contains the date the account was closed to further purchases, paid in full or sold. For Line of Credit, Open or Revolving accounts, there may be a balance due.</p> <p>Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If not applicable, zero fill.</p> | 8 | 198-205 | N |
| 27 | <p>Date of Last Payment Report the date of the most recent consumer payment, whether full or partial payment is made.</p> <p>Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If the day is not available, use 01.</p> | 8 | 206-213 | N |
| 28 | <p>Interest Type Indicator Contains one of the following values that designates the interest type: F = Fixed V = Variable/Adjustable If indicator not available or unknown, blank fill.</p> <p>Note: Report indicator 'V' for loans where the interest rate will be variable at some point, even if the interest rate starts as fixed.</p> | 1 | 214 | AN |
| 28A | <p>Reserved Blank fill.</p> | 16 | 215-230 | AN |
| 29 | <p>Consumer Transaction Type Used to indicate a new record, a new borrower or a change in consumer identification. Values available: 1 = Newly opened account, or new borrower associated with existing account 2 = Name change 3 = Address change 5 = Social Security Number change 6 = Name & Address change 8 = Name & Social Security Number change 9 = Address & Social Security Number change A = Name, Address and/or Social Security Number change If account or borrower is not new, or if no change in consumer information, blank fill.</p> | 1 | 231 | AN |

Charge-offs – FAQ 34

34. Questions: Charge-offs:

(a) How should charged off accounts be reported?

Answer: Report the following Base Segment fields:

- Scheduled Monthly Payment Amount = zero
- Account Status = 97 (Unpaid balance reported as a loss - charge-off)
- Current Balance and Amount Past Due = outstanding balance amount, which may include fees and interest. If payments are made by the consumer, report the declining balance in these two fields.
- Original Charge-off Amount = the original amount charged to loss, regardless of the declining balance. This field should not be changed.
- FCRA Compliance/Date of First Delinquency = the date of the first delinquency that led to the account being charged off
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), zero fill. For Revolving, Open and Line of Credit accounts (Portfolio Types R, O and C), if the account is closed, report the date the account was closed to further purchases. Otherwise, zero fill.
- Date of Last Payment = date of the consumer's most recent payment

Note: If the deficiency balance is being charged off for accounting and general ledger purposes only, **do not report** the account as a charge off. Deduct the charged off amount from the Current Balance of the ongoing account.

FAQ 34 continued on next page

Charge-offs – FAQ 34 continued

34(b) How should paid charge-off accounts be reported?

Answer: Report the following Base Segment fields:

- Scheduled Monthly Payment Amount = zero
- Account Status = 64 (Account paid in full, was a charge-off)
- Special Comment Code = If the account is settled for less than the full balance, include **AU**.
- Current Balance and Amount Past Due = zero
- Original Charge-off Amount = the original amount charged to loss
- Date of Account Information = date paid
- FCRA Compliance/Date of First Delinquency = the date of the first delinquency that led to the account being charged off
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), report the date the account was paid in full. For Revolving, Open and Line of Credit accounts (Portfolio Types R, O and C), report the date the account was closed to further purchases.
- Date of Last Payment = date of the consumer's most recent payment

34(c) Is there a preferred method of reporting when an account is partially charged off?

Answer: When the consumer is held responsible for the portion of the debt that is charged off, follow the guidance below.

Note: If the deficiency balance is being charged off for accounting and general ledger purposes only, **do not report** the charge off as a separate account as described below. Deduct the charged off amount from the Current Balance of the ongoing account.

Report the original account with the appropriate Account Status for that month (e.g., Current, 30 days delinquent, 60 days delinquent) with a balance that does not include the amount charged to loss.

The charged off portion of the balance should be reported as a separate account with a new Account Number. Other pertinent fields should be reported as follows:

- Date Opened = original date opened
- Original Charge-off Amount = amount charged to loss
- FCRA Compliance/Date of First Delinquency = date of the first delinquency in the series of delinquencies that led up to the charge-off

If the original account is subsequently charged off, both accounts would be reported as Account Status Code **97** (Charge-off), but would have different Original Charge-off Amounts.

| FIELD | FIELD NAME & DESCRIPTION | 426 Character Format | | |
|-------|--|----------------------|----------|---------------------|
| | | Length | Position | Recording Technique |
| 38 | <p>Consumer Information Indicator Contains a value that indicates a special condition of the account that applies to the primary consumer.</p> <p>This special condition may be that a bankruptcy was filed, discharged, dismissed or withdrawn; a debt was reaffirmed; or the consumer cannot be located or is now located.</p> <p>The indicator should be reported one time and will remain on file until another Consumer Information Indicator or a Removal value is reported. As an option, the indicator may be reported each month as long as the condition applies.</p> <p>Regardless of the method of reporting, the indicator will be deleted <i>only</i> when another Consumer Information Indicator or a Removal value (Q, S, U) is reported.</p> <p>Exhibit 11 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines, refer to Frequently Asked Questions 23 through 32 (bankruptcy) and 61 (personal receivership).</p> <p>Note: When converting from Metro™ to Metro 2®, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2® submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro™ submission.</p> | 2 | 326-327 | AN |
| 39 | <p>Country Code Contains the standard two-character country abbreviation.</p> <p>Exhibit 12 provides a list of the Country Codes.</p> | 2 | 328-329 | AN |

Exhibit 8 – Compliance Condition Codes

Interactive Intelligence, ARM Division doesn't support the option indicated with a strikethrough.

Compliance Condition Codes

Important Notes:

When a dispute investigation is completed, it is important to update the Compliance Condition Code to show that the investigation has been completed or to delete the previously-reported Compliance Condition Code. Please consult with your internal Legal counsel regarding which option your company prefers to use; and if you choose to report a code indicating that the investigation has been completed, how long to retain the code on the consumer's file.

When converting from Metro™ to Metro 2®, it is necessary to report the applicable Compliance Condition Code on your first Metro 2® submission, even if you had reported this information through a Special Comment on your last Metro™ submission.

The code should be reported one time and will be deleted only when another Compliance Condition Code or the XR (Removal value) is reported. Example:

| Date of Account Information | CCC | Action |
|-----------------------------|-------|-------------------------|
| 03/15/2015 | XB | XB is added to file. |
| 04/15/2015 | Blank | XB is retained. |
| 05/15/2015 | Blank | XB is retained. |
| 06/15/2015 | Blank | XB is retained. |
| 07/15/2015 | XC | XB is replaced with XC. |
| 08/15/2015 | Blank | XC is retained. |
| 09/15/2015 | XR | XC is removed. |

~~As an option, the code may be reported each month as long as the condition applies.~~

| Date of Account Information | CCC | Action |
|--|------------------|------------------------------------|
| 03/15/2015 | XB | XB is added to file. |
| 04/15/2015 | XB | XB is retained. |
| 05/15/2015 | XB | XB is retained. |
| 06/15/2015 | Blank | XB is retained. |
| 07/15/2015 | XC | XB is replaced with XC. |
| 08/15/2015 | XC | XC is retained. |
| 09/15/2015 | XR | XC is removed. |

Note: Regardless of the method of reporting, the code will be deleted *only* when another Compliance Condition Code or the XR (Removal value) is reported.

Exhibit 11 - Consumer Information Indicators

Interactive Intelligence, ARM Division doesn't support the codes indicated with a strikethrough.

Consumer Information Indicators

The Consumer Information Indicator (CII), which is reported in Field 38 of the Base Segment, Field 11 of the J1 Segment, and Field 11 of the J2 Segment, contains a value that indicates a special condition that applies to the specific consumer. The Consumer Information Indicator must be reported only on the consumer to whom the information applies. Report the following values:

| Code | Description |
|---------------|--|
| BLANK | Retains previously reported value, or no new Consumer Information Indicator applies for this activity period |
| A | Petition for Chapter 7 Bankruptcy |
| B | Petition for Chapter 11 Bankruptcy |
| C | Petition for Chapter 12 Bankruptcy |
| D | Petition for Chapter 13 Bankruptcy |
| E | Discharged through Bankruptcy Chapter 7 |
| F | Discharged through Bankruptcy Chapter 11 |
| G | Discharged through Bankruptcy Chapter 12 |
| H | Discharged/Completed through Bankruptcy Chapter 13 (Should be reported when consumer has completed all payments through the Chapter 13 plan) |
| I | Chapter 7 Bankruptcy Dismissed |
| J | Chapter 11 Bankruptcy Dismissed |
| K | Chapter 12 Bankruptcy Dismissed |
| L | Chapter 13 Bankruptcy Dismissed |
| M | Chapter 7 Bankruptcy Withdrawn |
| N | Chapter 11 Bankruptcy Withdrawn |
| O | Chapter 12 Bankruptcy Withdrawn |
| P | Chapter 13 Bankruptcy Withdrawn |
| Z | Bankruptcy – Undesignated Chapter Note: Report indicators with specific bankruptcy chapters, when known. |
| 1A | Personal Receivership |
| Q | Removes previously reported Bankruptcy Indicator (A through P and Z) or Personal Receivership Indicator (1A). Also used to report Bankruptcies that have been closed or terminated without being discharged or dismissed. Note: Do not report Q as a default value. If no new CII applies in the current activity period, blank fill this field. |

(continued)

Exhibit 11 - Consumer Information Indicators continued

Consumer Information Indicators

| Code | Description |
|---------------|---|
| R | Reaffirmation of Debt |
| V | Chapter 7 Reaffirmation of Debt Rescinded |
| 2A | Lease Assumption |
| S | Removes previously reported Reaffirmation of Debt, Reaffirmation of Debt Rescinded and Lease Assumption Indicators (R, V, 2A, and Obsolete values W, X, Y) Note: Do not report S as a default value. If no new CII applies in the current activity period, blank fill this field. |
| T | Credit Grantor Cannot Locate Consumer |
| U | Consumer Now Located (Removes previously reported T Indicator) Note: Do not report U as a default value. If no new CII applies in the current activity period, blank fill this field. |

Notes: When converting from Metro™ to Metro 2®, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2® submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro™ submission.

Codes W (Chapter 11 Reaffirmation of Debt Rescinded), X (Chapter 12 Reaffirmation of Debt Rescinded) and Y (Chapter 13 Reaffirmation of Debt Rescinded) are obsolete as of September 2010 and may no longer be reported.

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Accounts included in bankruptcy

Chapter 7, 11, or 12 – FAQ 27

27. Questions: Accounts included in Bankruptcy Chapter 7, 11 or 12:

(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 7, 11 or 12?

Answer: Report the account according to the following guidelines:

| | All Borrowers Filed Bankruptcy Chapter 7, 11 or 12 |
|---|--|
| Month BK Filed | <ul style="list-style-type: none"> • CII = A, B or C (Petition for Chapter 7, 11 or 12 Bankruptcy) • Account Status = status at time of petition • Payment History = first character based on previous month's status plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should either be terminated (ECOA Code T) or deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p> |
| Months Between Petition Filed & BK Resolution (Reaffirmation of Debt, Lease Assumption, Discharged, Dismissed, Withdrawn) | <ul style="list-style-type: none"> • CII = Blank (previous petition value reported is retained) or CII = A, B or C • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus history reported prior to bankruptcy filing) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date |
| Reaffirmation of Debt or Lease Assumption | <ul style="list-style-type: none"> • CII = R (Reaffirmation of Debt) or 2A (Lease Assumption) • Account information as it applies going forward |
| BK Discharged | <ul style="list-style-type: none"> • CII = E, F or G (Discharged through BK Chapter 7, 11 or 12) • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Note: After reporting the discharge CII for all Filers, discontinue reporting the account.</p> |

FAQ 27(a) continued on next page

FAQ-27 – continued

FAQ 27(a) (continued)

| All Borrowers Filed Bankruptcy Chapter 7, 11 or 12 | |
|---|--|
| Reaffirmation of Debt Rescinded | <ul style="list-style-type: none"> • CII = V (Chapter 7 Reaffirmation of Debt Rescinded) • Account Status = status at time of petition • Payment History = increment first position based on previous month's Account Status, plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Note: After reporting CII 'V' for all Filers, if the bankruptcy has been discharged, discontinue reporting the account. If the bankruptcy has not yet been discharged, continue reporting the account and Filers with the applicable CIIs.</p> |
| BK Dismissed | <ul style="list-style-type: none"> • CII = I, J or K (BK Chapter 7, 11 or 12 Dismissed) • Account Information as it applies going forward |
| BK Withdrawn | <ul style="list-style-type: none"> • CII = M, N or O (BK Chapter 7, 11 or 12 Withdrawn) • Account Information as it applies going forward |

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Closed or terminated but not discharged or dismissed – FAQ 32

32. Question: How should an account be reported when a Bankruptcy case has been closed or terminated without being discharged or dismissed?

Answer: Report Consumer Information Indicator **Q** to remove the previously-reported Bankruptcy Petition Indicator. If the case is re-opened, report the Consumer Information Indicator for the appropriate disposition; e.g., petition, discharged or dismissed.

Note: A bankruptcy case may be closed or terminated when the consumer does not pay the applicable court fees or does not attend the required financial management class.

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Change Log

The following table lists the changes to the *CBR Compliance and Enhancements Technical Reference* since its initial release.

| Date | Change |
|-----------------|---|
| 24-October-2016 | Added "Exhibit 8 – Compliance Condition Codes" to appendix. |
| 08-March-2018 | Rebranded to Genesys. |
| 15-July-2019 | Reorganized the content only, which included combining some topics and deleting others that just had an introductory sentence such as, "In this section..." |