



Federal Deposit Insurance Corporation  
550 17th Street NW, Washington, DC 20429-9990

Financial Institution Letter  
FIL-115-2007  
December 21, 2007

## Fair and Accurate Credit Transactions Act

### *Proposed Procedures to Enhance the Accuracy and Integrity of Information Furnished to Consumer Reporting Agencies*

**Summary:** The FDIC, the other federal financial institution regulatory agencies, and the Federal Trade Commission (the agencies) have jointly published for comment the attached proposed regulations and guidelines on the accuracy and integrity of information furnished to consumer reporting agencies (CRAs) and proposed regulations on direct disputes to furnishers of this information. The agencies are proposing to adopt these guidelines and regulations to satisfy the requirements of section 312 of the Fair and Accurate Credit Transactions Act (FACT Act), which amended section 623 of the Fair Credit Reporting Act (FCRA). Comments on the proposals are due February 1, 2008.

#### **Distribution:**

FDIC-Supervised Banks (Commercial and Savings)

#### **Suggested Routing:**

Chief Executive Officer  
Compliance Officer

#### **Related Topics:**

- FDIC Part 334 – Fair Credit Reporting
- FCRA – Section 623

#### **Attachment:**

[Interagency Notice of Proposed Rulemaking](#)  
[PDF 306k \(PDF Help\)](#)

#### **Contact:**

John Jackwood, Senior Policy Analyst (Compliance) at (202) 898-3991 or [jjackwood@fdic.gov](mailto:jjackwood@fdic.gov); or  
Richard Schwartz, Counsel at (202) 898-7411 or [rischwartz@fdic.gov](mailto:rischwartz@fdic.gov)

#### **Note:**

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#### **Highlights:**

- Section 623 of the FACT Act describes the responsibilities of persons that furnish information about consumers (furnishers) to CRAs, and, as amended by the FACT Act, contains provisions designed to enhance the accuracy and integrity of information in consumer reports.
- The proposed accuracy and integrity regulations require furnishers to establish reasonable policies and procedures for implementing the proposed accuracy and integrity guidelines. The proposed guidelines discuss the (1) nature, scope and objectives of a furnisher's policies and procedures, (2) duties that relate to the accuracy and integrity of the information about consumers that furnishers provide to CRAs, (3) steps that furnishers should take when establishing policies and procedures, and (4) specific components that should be addressed in policies and procedures.
- FCRA does not define the terms "accuracy" and "integrity." The agencies are proposing two alternative approaches to defining the terms in the regulatory text or in the guidelines.
- The proposed direct dispute regulations identify the circumstances under which a furnisher must reinvestigate disputes concerning the accuracy of information about the consumer contained in a consumer report, based on a direct request by the consumer.