



Suppression Codes for Firm Offers of Credit

During the firm offer of credit (FOC) credentialing process, there are multiple steps to establish eligibility to monitor a consumer's credit file in accordance with *Fair Credit Reporting Act* (FCRA) regulations.

After eligibility has been established, the company goes through the credit underwriting process. This is a very important step for the credit bureaus, Total Expert, and the organization that is monitoring for credit pulls.

Credit underwriting determines which of the consumers being monitored for credit pulls will instantly qualify for a firm offer of credit. This process involves deciding the range of credit score, presence of bankruptcy, debt-to-income ratios, number of tradelines, and so on.

Another key part of the credit underwriting process is tracking down all of the membership IDs that have been provided from any credit providers that your company uses currently. While you may have a main customer ID with Equifax, TransUnion, or Experian, you may also have sub-IDs for various branches, lines of business, regions, and so on.

If the organization uses a third party to initiate credit pulls (such as CredCo, Xactus, or Kroll) they also assign a membership ID. A membership ID is also a *suppression code*. When a bureau monitors for credit pulls on your consumers, they will not inform you of any pulls that were initiated using your own codes.

These membership IDs are used when checking a consumer's credit. Depending on how your organization is set up, you may have anywhere from 1 to hundreds of membership IDs to define:

Credit being pulled by:

- Branch level
- Regional level
- Different lines of business
- IDs from multiple vendors

Equifax will not track down Membership IDs for organizations. As stated by Equifax:

- *Equifax does not have tri-bureau member numbers. The member numbers we are privy to are only inquiries related to Equifax credit information.*
- *Equifax will not be liable for providing member numbers to be used for suppression. An end user could have infinite member numbers based on branch/department and is thus accountable for providing member numbers for suppression to ensure accuracy.*

Action Items

Based on how this process works, the organization that is monitoring credit must make best efforts to collect all of the membership IDs used across their organization.



Question: What happens if you don't know all of them?

Answer: Equifax will investigate any alerts that they send but the lender believes were triggered by their own process. The lender needs to alert their contacts at TE and explain that this consumer generated an alert right after pulling credit.

TE needs the consumer's name, address, and (ideally) the day that the alert was generated to track down the suppression code/membership ID that was used to pull credit.

Equifax will then investigate the credit pull, which may take up to 7 business days. When they find the code, if it is associated with the organization that received the alert, the code will automatically be added to the list of suppression codes and no other inquiries using that membership ID/suppression code will be sent by Equifax to that organization.