

FREQUENTLY ASKED QUESTIONS: INDIANA HOUSE BILL 1668

Dear Equifax Customer,

Recently, changes to how Equifax reports are delivered were made based on new legislation in Indiana. Some of you have requested additional information regarding the updates, so we have put together a quick FAQ to help answer your questions.

As always, thank you for being an Equifax customer. If you have questions regarding this communication or the programming changes, please contact your Equifax Sales, Technical or Customer Service representative.

BACKGROUND:

Indiana recently enacted House Bill 1668, which limits the use of a consumer's Social Security Number (SSN) in the search and match process of locating a credit report. The law became effective immediately when the governor signed the bill on May 1, 2019.

The new Indiana law prohibits the use of all or part of a consumer's SSN as the sole factor when determining whether a credit report in a credit bureau's files matches the identity of a person who is the subject of a credit inquiry from a user of credit reports. The law also requires at least 3 matching data points when an SSN is used to pull a credit report.

To continue to receive reports on Indiana consumers in a timely manner, we encourage you to provide as much information as possible to allow us to complete the inquiry.

FREQUENTLY ASKED QUESTIONS:

1. How Will this Impact What I Receive from Indiana in Credit Reports?

When the inquiry involves an Indiana consumer, the credit report will not be returned without two other pieces of matching information other than the inquiring SSN matching.

If the transaction does not contain enough matching information an error message will appear stating the following: **"07C - Insufficient Information for File Search – Additional Data is Needed."**

2. How Will this Impact What I Receive from Indiana in Credit Marketing Services?

Equifax Credit Marketing Services will comply with these new requirements for inquiries that are submitted for Prescreen and Account Management programs that have a state code for Indiana (IN).

3. How is an "Indiana consumer" defined? Is it based on the current address on the credit file, the inquiry address, or both?

An Indiana consumer is defined as a consumer with an Indiana address provided on their inquiry or present on their file in the Equifax core credit database, ACRO.

4. The communication said that Equifax requires 'two other pieces of matching information other than the inquiring SSN'. What qualifies as 'pieces of matching information'?



Name is required to match, plus one of current address, former address, or date of birth (DOB)

- 5. Does the name count or is that a 'given'? If the name DOES count, would the entire name (first name, MI, last name) count as one piece of information, or is first name one piece, last name is a second piece, etc.?**

For a file to be returned with Indiana information the first name and last name must match and there must be one other matching identifier such as current address, prior address or DOB.

- 6. What does Equifax consider a match in the address fields?**

The new law did not change how we treat each item of identification within our search match logic. It merely requires that we have more items if the SSN is among the items we are matching. Equifax needs the items of identification submitted to be as robust as possible whether they are name fields, address fields, or any of the others.

- 7. If the Social Security Number (SSN) is totally incorrect, would Equifax still return the file? Would Equifax return an error?**

It's possible for a file to be returned, see #5 above.

- 8. Should we drop the SSN from input?**

No, you should always send SSN. The SSN is needed to comply with federal laws and to help make sure that files are not returned to you that have been associated with fraudulent activity. Moreover, most customers utilize the file for FACTA compliance to validate the consumer's SSN. If you do not provide a SSN on input, Equifax will not output the SSN on file.

- 9. Why am I seeing files with a "07C" no hit indicator when both name & address appear to match the credit file?**

The additional identifying information is likely revealing that there is a mismatch in the additional information and what we have on file.

- 10. Can a DTEC (SSN Only) search be performed for Indiana files?**

No, DTEC search is not available for Indiana inquiries or files containing an Indiana address.

Regards,

Your Equifax Team