



CBA Reporter Members: Block Notifications and Rescission Requests

The Fair Credit Reporting Act (FCRA) sets requirements for accessing and reporting consumer credit data. This includes how to respond to ID theft and fraud claims. The FCRA sets specific guidance for:

1. What consumers must provide to the credit bureaus if they believe they are the victim of ID theft or fraud
2. What the bureaus must do if they are notified of ID theft or fraud
3. And what lenders and other furnishers of data must do if notified of ID theft or fraud

ID theft and fraud claims are treated differently than other types of consumer disputes. The bureaus are required to block all information from credit reports that is related to ID theft or fraud.

Yet, claiming ID theft or fraud isn't enough to automatically block information from a credit report. Instead, consumers must follow reporting guidance in the FCRA. You can learn more about this topic in our on-demand courses, "[Addressing Identity Theft on Credit Reports](#)" and "[Spotting Credit Repair Scams](#)."

If the bureaus believe all requirements have been met and that the dispute is credible, they will proceed with blocking this information from the consumer's credit report. This applies to any tradeline, or credit account, that the consumer indicates has originated due to ID theft or fraud. The credit bureaus will send a **Block Notification** to data furnishers to alert them that a credit account they have reported or are currently reporting has been blocked from the consumer's credit report.

Block Notifications

What to do If You Receive a Block Notification from CBA:

CBA's Credit Reporting Team will send you an email if the bureaus provide a Block Notification for any consumer or account that you are currently reporting or have reported before. This email will contain account details for you to review. Any images associated with the notification may be uploaded to the CBA Reporter site, just like the images that sometimes come with regular credit disputes.

If you receive a Block Notification, the FCRA says that you must stop reporting any consumer and account that has been blocked from a report due to ID theft or fraud. But you also have the ability to refute – or dispute – this block if you have evidence that shows this account has not originated from ID theft or fraud.

Why can the second option happen? Sometimes, a consumer gets confused about the accounts showing on their report, especially if they are legitimately experiencing identity theft related to other credit accounts. Other times, they're following guidance from a credit repair agency that has disputed all accounts on their report, sometimes using ID theft or fraud as a reason.

Responding to Block Notification:

Review information in your records, including details and documents provided with the consumer's application, later communications, payments received, etc. to see if there appears to be anything that is unusual or suspicious.

If you agree with the Block Notification and can confirm fraudulent activity:

- Use the account status code DF – Delete due to Fraud in your next Metro 2® final to send a final status update to the bureaus, which shows you are complying with your FCRA duties. **Then, stop reporting this account moving forward.**
- If this account has already stopped reporting because it's been satisfied, no further action is needed

If you can't be certain about any fraudulent activity:

- Use the account status code DA – Delete Account in your next Metro 2® final to send a final status update to the bureaus, which shows you are complying with your FCRA duties. **Then, stop reporting this account moving forward.**
- If this account has already stopped reporting because it's been satisfied, no further action is needed

If you investigate and have reasonable cause to believe this Block Notification is incorrect:

- Respond to CBA's Credit Reporting Team that you want to submit a request, called a **Block Rescission Request (BRR)**, to unblock the information from the consumer's credit report. This will add it back onto the report
- You may be asked to verify the consumer's ID information, like in a standard dispute
- You must provide CBA with written confirmation that the information being reported is correct
- You must confirm, in writing, what types of documentation or evidence you have on file to support your request

You will have up to 120 days from the initial block to respond with a BRR, but you will need to investigate and stop reporting immediately.

CBA will submit the request to the bureaus once we have received your written confirmation. A Block Rescission Request is still just a request that the information be unblocked from a report. The bureau will make the final decision if they continue to block this information or if they agree to your request.

Types of supporting evidence for a BRR:

- Original or copy of signed application
- Original or copy of signed contract
- Copy of Consumer identification submitted by Consumer at time of application
- Account payment documentation (e.g.: Signed, canceled check, signed ACH authorization and debit from Consumer's bank account)
- Communication to/from the Consumer or a representative of the Consumer indicating that the consumer received loan proceeds or collateral (e.g., request for deferral,
- Modification, adjustment to account, time to pay, promise to pay, inclusion of debt in bankruptcy petition
- Evidence that Consumer has possession of the Residential Real Property collateral type
- Evidence that Consumer has possession of the Auto/RV/Boat collateral type
- Evidence that Consumer has possession of Personal Property collateral type
- Evidence that the Consumer received loan proceeds or accessed credit to purchase goods or services (e.g., confirmation from third party, such as bank or merchant)
- Verification of an invalid or fraudulent police report or identity theft report
- Direct communication from Consumer confirming Account was opened by Consumer and Block should be removed

Resources

CBA Training Institute:

Addressing Identity Theft on Credit Reports – On-demand course:
<https://cbatraininginstitute.org/product/addressing-identity-theft-on-credit-reports/>

Spotting Credit Repair Scams – On-demand course:
<https://cbatraininginstitute.org/product/spotting-credit-repair-scams/>

FTC Resources on ID Theft Notifications and FCRA Responsibilities

[https://www.identitytheft.gov/assets/pdf/FTC Notice To Furnishers.pdf](https://www.identitytheft.gov/assets/pdf/FTC_Note_to_Furnishers.pdf)

<https://www.ftc.gov/business-guidance/resources/consumer-reports-what-information-furnishers-need-know#Additional%20Responsibilities>

ID Theft and CFPB regulation:

<https://www.consumerfinancialserviceslawmonitor.com/2025/04/the-next-fcra-frontier-identity-theft-and-cfpb-updates/>

Reasonable Investigation standards updates:

<https://www.consumerfinancialserviceslawmonitor.com/2025/06/second-circuit-explains-reasonable-investigation-standard-in-identity-theft-case-under-fcra/>

Consumer resources for ID theft:

IdentityTheft.gov initial steps to start recovery process:
<https://www.identitytheft.gov/Steps>

Sample letter to bureaus to dispute accounts involved in ID theft:
<https://www.identitytheft.gov/Sample-Letters/dispute-credit-bureau>

FTC information for consumers: <https://consumer.ftc.gov/identity-theft-and-online-security/identity-theft>

Disclaimer:

This guidance document is not intended to provide legal advice and may not be used as legal advice. CBA encourages you to carefully review all contracts signed with the credit bureaus and general guidance from the [Federal Trade Commission](#) related to FCRA adherence.

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