



LETTER CIRCULAR NO. 2021- 13
SERIES OF 2021

DATE : 07 DECEMBER 2021

TO : SUBMITTING ENTITIES IN PRODUCTION

**SUBJECT : SPECIAL SUBMISSION OF SEPARATE FILE
TO UPDATE/CORRECT DISPUTER'S CREDIT DATA**

I. Background

In view of the right of a data subject¹ to dispute erroneous, incomplete or misleading credit information as well as its right to a simplified dispute resolution process protected by RA 9510 or the Credit Information System Act, the Credit Information Corporation (CIC) issued Circular No. 2019-01, Series of 2019 providing guidelines for the Online Dispute Resolution Process (ODRP). The ODRP requires the Submitting Entities (SE) to submit their recommended action on the pending dispute through the CIC Helpdesk. The recommended action should state the following information: acknowledgment of the validity or invalidity of the disputed information, the supporting document/s received and reviewed in relation thereto, and the underlying basis or justification for the acceptance or rejection of the Dispute. This information shall guide CIC in resolving the pending dispute to ensure that only correct, accurate and updated credit information of the borrower/disputer is reflected in their Credit Reports.

During the implementation of the ODRP, the CIC noted the instances wherein the SE recommends/confirms that the Dispute was resolved since the Disputer's correction file was already submitted to CIC, the Disputer would still inquire with the CIC to verify such status.

Mindful of the aforesaid rights of the borrower, even if the requested verification step was not recognized under the ODRP Guidelines, the CIC acknowledged and assisted such inquiries by requesting the SEs to provide the **file name and submission date** of Disputer's credit information. The requested

¹ Data subject refers to existing borrower or loan applicant or anyone who in any way applies for or avails of a credit facility.

information is then forwarded by the CIC to the proper unit for verification of the status of Disputer's information. It is at this point that it is determined if the submitted report was loaded successfully without errors. However, this practice has been observed to lead to delays in the prompt resolution of the dispute since the corrected data has to be tracked down and verified amidst the millions of data records with the CIC, straining the organization's limited resources.

II. Special Submission to Update or Correct Borrowers' Credit Information

For purposes of addressing the disputed credit data, SEs are now directed to submit "Special Submission" Files to Update or Correct Borrowers' Credit Information (Special Submission). This Special Submission shall be submitted **separately** from the Regular Contribution File which is submitted monthly. All relevant data to be corrected pertaining to a dispute shall be contained in the Special Submission and future Regular Contribution Files shall be consistent with the corrections made therein.

Special Submission must be submitted upon confirmation/acceptance of the SE of the validity of the Dispute. As a matter of procedure, the CIC will prioritize the loading of these Special Submissions to ensure that any erroneous, outdated or misleading credit information found in the basic credit report will be resolved and updated expeditiously.

To validate the loading of the Special Submission, the Disputer will then be prompted to pull a new credit report once the CIC system loads the same.

For all pending disputes, the same principle applies wherein once the SE confirms the validity of the dispute, it must submit a Special Submission. This means that the SE may have to **re-submit the files containing only the corrected credit data of the disputer and identify the same as Special Submission.**

After the Special Submission is submitted in their respective FTP folders, the SE must notify the concerned operator copying the Dispute Resolution Team. The notification must indicate the following details: **(a) file name containing the corrected credit data; (2) subject provider number of the Disputer; and (3) contract provider number of the Disputer.** The attached transmittal template, marked as Annex "A" shall be used.


III. Guidelines in Submission

1. The SE must submit the Special Submission upon its confirmation/acceptance of the validity of the Dispute.
2. The Special Submission format is the same to that of Regular Contribution File but will only contain the information of the Disputer.

3. Should the SE need technical assistance on Special Submissions, it may contact its assigned CIC Data Operator for support or email cis-support@creditinfo.gov.ph.

By observing this process, we can ensure the speedy resolution of disputes, and consequently produce Credit Reports which reflect the current and actual information of borrowers.

For your guidance and strict compliance.



ATTY. BEN JOSHUA A. BALTAZAR
President and CEO

TRANSMITTAL LETTER

**SPECIAL SUBMISSION OF SEPARATE FILE
TO UPDATE/CORRECT DISPUTER'S CREDIT DATA**

Respectfully submitting the attached Special Submission to update/correct file for (NAME OF DISPUTER) with the following verification details:

1. File name: _____
2. Subject provider number of the Disputer: _____
3. Contract provider number of the Disputer: _____

Authorized Representative

Date