

APRIL 20, 2020



DATA REPORTING GUIDELINES FOR  
IMPLEMENTATION OF COVID 19  
REGULATORY PACKAGE

By EXPERIAN INDIA

## Background

As you are aware, the Reserve Bank of India, vide circular no. RBI/201920/186DOR.No.BP.BC.47/21.04.048/2019-20 dated March 27, 2020 ('Circular') permitted all banks and non-banking financial institutions to grant its borrowers a moratorium of three months on payment of all instalments falling due between March 1, 2020 and May 31, 2020. It also allowed lending institutions to defer the recovery of interest applied in respect of all working capital facilities sanctioned in the form of cash credit/overdraft ("CC/OD") during this period.

By way of the Circular, the RBI has also directed all Credit Information Companies to ensure that the actions taken by lending institutions pursuant to the above reliefs granted, do not adversely impact the credit history of the beneficiaries.

- To enable Experian, as a Credit Information Company, to comply with the Circular, it is pertinent for Experian to receive accurate data regarding the grant of moratorium by Credit Institutions. For Experian to be able to ensure uniformity in credit reporting and validate that the credit history of a borrower is appropriately captured, we request you to adhere to the following 'Data Reporting Guidelines' whilst making submissions.

## Data Reporting Guidelines

### 1.0 Consumer & Commercial Data Submission for Moratorium Cycles, starting Mar 20 data submission

1.1 Data to be submitted as per table 1 provided below:

Sr. No.	Moratorium Applicability	Customer/MSME to opt in explicitly	Blanket Moratorium for all Customers
1	Customers No eligible for Moratorium (NPA/90+) as on 29th Feb 2020	Regular Reporting	Regular Reporting
2	Customers whose Mar20 EMIs are cleared or Credit card MAD/Total dues paid	Regular Reporting	Regular Reporting
3	Customers whose Mar20 EMIs not cleared or Credit Card MAD not paid	As per Bank Policy	NA
4	Moratorium Accounts & applicable condition:		
4.1	EMI product, Account is 0/Current as of 29th Feb,2020:	<b>DPD/Asset Classification:</b> Freeze <b>Principle O/S:</b> Freeze <b>Amount Overdue :</b> 0	<b>DPD/Asset Classification:</b> Freeze <b>Principle O/S:</b> Freeze <b>Amount Overdue :</b> 0
4.2	EMI product, Account is 1-90 DPD/Standard as of 29th Feb,2020:	<b>DPD/Asset Classification:</b> to flow forward as per oldest default date <b>Principle O/S :</b> Freeze <b>Amount Overdue :</b> Freeze till 31May 2020	<b>DPD/Asset Classification:</b> to flow forward as per oldest default date <b>Principle O/S :</b> Freeze <b>Amount Overdue :</b> Freeze till 31May 2020



Sr. No.	Moratorium Applicability	Customer/MSME to opt in explicitly	Blanket Moratorium for all Customers
4.3	Credit Card Product, Account is 0/Current as of 29th Feb,2020:	<b>DPD/Asset Classification:</b> Freeze <b>Principle O/S :</b> Add interest to Total outstanding amount and report; no late payment fee should be charged to such accounts <b>Amount Overdue :</b> 0	<b>DPD/Asset Classification:</b> Freeze <b>Principle O/S:</b> Add interest to Total outstanding amount and report; no late payment fee should be charged to such accounts <b>Amount Overdue :</b> 0
4.4	Credit Card Product, Account is 1-90 DPD/Standard as of 29th Feb,2020:	<b>DPD/Asset Classification:</b> to flow forward as per oldest default date <b>Principle O/S:</b> Add interest to Total outstanding amount and report; no late payment fee should be charged to such accounts <b>Amount Overdue:</b> Freeze till 31May 2020	<b>DPD/Asset Classification:</b> to flow forward as per oldest default date <b>Principle O/S:</b> Add interest to Total outstanding amount and report; no late payment fee should be charged to such accounts <b>Amount Overdue:</b> Freeze till 31May 2020

1.2 In addition to regular data submission, members are required to submit a list of all customers who have opted-in for the moratorium and have been granted the same, for the period March 2020 to May 2020

## **2.0 OLM for customers who opt in for moratorium post Mar20 data submission is made to Experian**

- 2.1 Member to make changes in DPD/Asset Classification, Principle outstanding and amount overdue as per the guidelines provided in section 1.0, Grid 1.1 above
- 2.2 Revised OLM file to be shared with Experian for correction

## **3.0 OLM for customers who opt out of moratorium post Mar20 data submission is made to Experian**

- 3.1 Based on the customer's explicit consent to withdraw from the moratorium, the member must make changes in DPD/asset classification, principal outstanding and amount overdue as per the guidelines provided in table 2 below
- 3.2 Revised OLM file to be shared with Experian for correction



**Table 2:**

Sr. No.	Moratorium Applicability	Customer/MSME to opt in explicitly	Blanket Moratorium for all Customers
1.1	EMI product, Account is 0/Current as of 29th Feb,2020:	<p><b>DPD/Asset Classification:</b> un-Freeze</p> <p><b>Principle O/S:</b> roll back freeze &amp; calculate as per normal accounting policy</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>	<p><b>DPD/Asset Classification:</b> un-Freeze</p> <p><b>Principle O/S:</b> roll back freeze &amp; calculate as per normal accounting policy</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>
1.2	EMI product, Account is 1-90 DPD/Standard as of 29th Feb,2020:	<p><b>DPD/Asset Classification:</b> to flow forward as per oldest default date</p> <p><b>Principle O/S:</b> roll back freeze &amp; calculate as per normal accounting policy</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>	<p><b>DPD/Asset Classification:</b> to flow forward as per oldest default date</p> <p><b>Principle O/S:</b> roll back freeze &amp; calculate as per normal accounting policy</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>
1.3	Credit Card Product, Account is 0/Current as of 29th Feb,2020:	<p><b>DPD/Asset Classification:</b> un-Freeze</p> <p><b>Principle O/S:</b> Add interest to Total outstanding amount and report; late payment charges can be calculated as per normal policy and to be added to principle outstanding</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>	<p><b>DPD/Asset Classification:</b> un-Freeze</p> <p><b>Principle O/S:</b> Add interest to Total outstanding amount and report; late payment charges can be calculated as per normal policy and to be added to principle outstanding</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>
1.4	Credit Card Product, Account is 1-90 DPD/Standard as of 29th Feb,2020:	<p><b>DPD/Asset Classification:</b> to flow forward as per oldest default date</p> <p><b>Principle O/S:</b> Add interest to Total outstanding amount and report; late payment charges can be calculated as per normal policy and to be added to principle outstanding</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>	<p><b>DPD/Asset Classification:</b> to flow forward as per oldest default date</p> <p><b>Principle O/S:</b> Add interest to Total outstanding amount and report; late payment charges can be calculated as per normal policy and to be added to principle outstanding</p> <p><b>Amount Overdue:</b> roll back freeze &amp; calculate as per normal accounting policy</p>

**4.0 Illustrative Examples for data submission**

**Table 3:**

Scenario1:	<p>1. EMI cycle 5th of the month</p> <p>2. 0 DPD/Current as of 29th Feb, 2020</p> <p>3. EMI amount INR 20000 (Principle 3000, Interest 17000)</p> <p>4. Principle O/S as of 29th Feb, 2020: 10,80,000</p> <p>3. Didn't opt for Moratorium</p>	Mar20 EOM data
	Cleared Mar20 EMI	DPD: 0 Overdue Amount:0 Principle O/S: 10,77,000
	Didn't clear Mar20 EMI	DPD: 26 Overdue Amount:20,000 Principle O/S: 10,80,000



Scenario2:	<ol style="list-style-type: none"> <li>1. EMI cycle 5th of the month</li> <li>2. 0 DPD/Current as of 29th Feb, 2020</li> <li>3.EMI amount INR 20000 (Principle 3000, Interest 17000)</li> <li>4. Principle O/S as of 29th Feb, 2020: 10,80,000</li> <li>3. Opted for Moratorium</li> </ol>	
	Cleared Mar20 EMI	DPD: 0 Overdue Amount:0 Principle O/S: 10,77,000
	Didn't clear Mar20 EMI	DPD: 0 Overdue Amount:0 Principle O/S: 10,80,000
Scenario3:	<ol style="list-style-type: none"> <li>1. EMI cycle 5th of the month</li> <li>2. 55 DPD/Current as of 29th Feb, 2020</li> <li>3.EMI amount INR 20000 (Principle 3000, Interest 17000)</li> <li>4. Overdue amount as of 29th Feb, 2020: 40,000</li> <li>5. Principle O/S as of 29th Feb, 2020: 10,80,000</li> <li>6. Didn't opt for Moratorium</li> </ol>	
	Cleared Mar20 EMI	DPD: 60 Overdue Amount:40,000 Principle O/S: 10,77,000
	Didn't clear Mar20 EMI	DPD: 86 Overdue Amount:60,000 Principle O/S: 10,80,000
Scenario4:	<ol style="list-style-type: none"> <li>1. EMI cycle 5th of the month</li> <li>2. 55 DPD/Current as of 29th Feb, 2020</li> <li>3.EMI amount INR 20000 (Principle 3000, Interest 17000)</li> <li>4. Overdue amount as of 29th Feb, 2020: 40,000</li> <li>5. Principle O/S as of 29th Feb, 2020: 10,80,000</li> <li>6. Opted for Moratorium</li> </ol>	
	Cleared Mar20 EMI	DPD: 60 Overdue Amount:20,000 Principle O/S: 10,77,000
	Didn't clear Mar20 EMI	DPD: 86 Overdue Amount:40,000 Principle O/S: 10,80,000

Disclaimer: These Data Reporting Guidelines do not mandate a Credit Institution to provide a moratorium to its borrowers. No reliance must be placed on this document to decide whether a moratorium to borrowers must be provided or not. This must be solely decided by the Credit Institutions as per their reading of the Circular and any internal guidelines issued for the same.. This document only provides guidelines for data submission for the moratorium period.

