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Housing Affordability Breakthrough Challenge

Mapping Rent Reporting for Credit Building: A Landscape Scan of the Affordable Housing Industry

By: **Evelyn Immonen and Grace Campion**

Overview

How important is a credit score for a renter? Traditional credit reporting practices for renters are different than those for homeowners, but that is starting to change. Credit scores are the primary reference that landlords review or use to screen potential new tenants. Having poor, low, or non-existent credit remains a barrier to affordable housing for low-income people. This affects not only their ability to qualify for rental housing, but also the probability of transitioning between renting and owning their own home by qualifying for financial products with fair and reasonable interest rates — a key wealth-building milestone that signifies upward mobility.

Acknowledgments

The authors would like to thank the following individuals for their contributions and assistance:

Susan Anderson
Andrew Jakabovics
Caren Johnson
Talia Kahn-Kravis
Jennie Rodgers
Richard Reeve
Christi Smith
Orlando Velez

This research was supported by the Housing Affordability Breakthrough Challenge, powered by Wells Fargo.

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Enterprise®

About Enterprise Community Partners

Enterprise is a national nonprofit that exists to make a good home possible for the millions of families without one. We support community development organizations on the ground, aggregate and invest capital for impact, advance housing policy at every level of government, and build and manage communities ourselves. Since 1982, we have invested $44 billion and created 781,000 homes across all 50 states – all to make home and community places of pride, power and belonging. Join us at enterprisecommunity.org.

Table of Contents

Rent Reporting for Credit Building

Rent reporting for credit building is a financial reporting innovation that aims to amplify the consumer credit profile and potentially increase credit scores in the process. Rent reporting works by having the landlord submit their tenant's rent payment information to the credit bureau(s). This added information on their credit profile gives tenants a chance to improve their overall credit score. Currently, mortgages paid on a home positively affect a homeowner's credit scores, but timely rental payments remain largely invisible to credit bureaus. Not only does rent reporting benefit those seeking rental or homeownership opportunities, but the mechanism operates within the rental housing market.

As an element of the Challenge Network, a program of the Housing Affordability Breakthrough Challenge (HABC), Enterprise is further exploring the latent potential of rent reporting for credit building, hoping ultimately to scale the Center for New York City Neighborhood's pilot program. In this landscape scan, we outline the history of credit reporting in America and map out the existing network of assets.

Document Purpose

This document was compiled using an "asset mapping" approach. Asset mapping is generally a systematic process of cataloging key services, benefits, and resources within the community. Asset maps can be used to identify and illustrate the existing or potential connections between groups, organizations, and institutions. This document summarizes existing information available about the field of rent reporting. The asset mapping exercise was intended to gather current information on rent reporting for credit building in one place. The information included in this document is at a high-level and intended to be an overview of the current state of play. This document is not intended to be a comprehensive research study of the topic.

Background

While revolving credit plans emerged in the 1950s, lower income neighborhoods, minorities, and unmarried women were excluded from these policies, and consumers still risked repossession if they did not pay. Ultimately, progress towards more equal credit systems occurred with the Fair Credit Reporting Act (FCRA) and Equal Credit Opportunity Act in the 1970s, largely due to protests from women who were unable to open their own line of credit separate from their husbands'.

Credit then became more computerized and "objective," though redlining and discrimination based on zip codes continued to occur. Individualized credit scores grew in importance and the FICO score was developed. By the end of the 1990s, two-thirds households used bank-issued revolving credit for home loans, where in 1960 only 1 out of 6 households had.[1] Regulations under FCRA solidified into consumer rights and protections against discrimination from credit unions.

Today these policies continue. Vantage Score, a collaboration of three major credit bureaus, Equifax, Experian and TransUnion, recently emerged in 2006 and is continually evolving and using machine learning to optimize reporting.[2] Credit remains an imperfect and ever-changing system, but it is undoubtedly an inextricable part of the American economy, especially in rental and homeownership markets.

Positive rent reporting represents a pathway to build better credit for pre-existing good behavior. Unlike homeowners, renters do not "get credit" on their credit reports for making monthly housing payments. In one U.S. Department of Housing and Urban Development (HUD) **study** from 2019, introducing positive rental data led to 16.5 times as many consumers whose score increased than those whose score decreased. The consumers who had credit scores about 620 improved their scores by 54% with the inclusion of rental reporting data.[3] More research on the impact of this policy could lead to a better understanding of the program benefits.

A recent **report** on "The Use of Alternative Data in Underwriting Credit" from FinRag Lab and Urban Institute included a section on small-scale rent reporting pilots. The report showed that in simulations, 76 percent of "typical" NYC renters experienced score increases, with 19% experiencing an average increase of 11 points or more. In another study, eleven percent of subsidized renters were unscorable at the outset but became scorable with the addition of rental payment data, with an average score of 670.[4]

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[1] https://esusurent.com/blog/a-brief-history-of-u-s-consumer-credit-part-2-consumer-credit-becomes-a-right/

[2] https://vantagescore.com/consumers/why-vantagescore/how-it-works

[3] https://www.huduser.gov/portal/sites/default/files/pdf/Potential-Impacts-of-Credit-Reporting.pdf

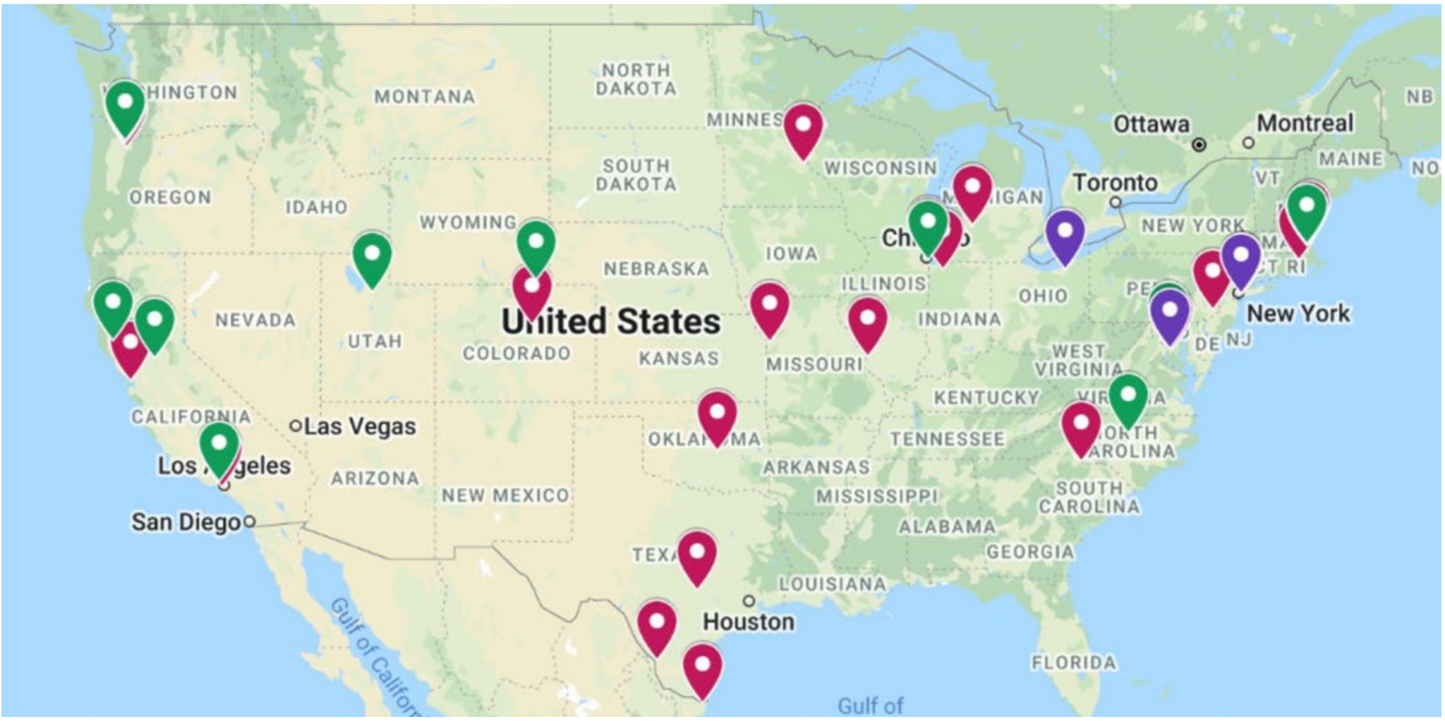
[4] https://finreglab.org/wp-content/uploads/2022/03/utility-telecommunications-and-rental-data-in-underwriting-credit_0.pdf

Asset Mapping

In order to evolve the system of rent reporting, we must consider the landscape of entities that work within the system, and map out how each industry impacts the credit reporting ecosystem. For purposes of this report, we categorize two major sectors of the ecosystem: nonprofit organizations and federal entities. This is by no means an exhaustive list of organizations that are integral to the rent reporting ecosytem.

Below is a **collaborative mapping exercise** completed with the assistance of Credit Builders Alliance that includes locations where rent reporting for credit building has been piloted. Markers are color coded based on the available software: Esusu, another third-party software group, or reporting directly to one or more credit bureau. Additionally, participants in the Rent Reporting for Credit Building Summit[5] also **added data points** based on their pilot programs from around the country. This map may exclude many of the sites in California after the passage of SB1157. While the map is not comprehensive, it represents the geographic scope of where rent reporting pilot programs have been implemented.

[5] Enterprise and the Credit Builders Alliance (CBA) planned and facilitated a Summit that included three two-hour sessions and took place in April and May 2022. The Summit series helped build towards our collective understanding of rent reporting for credit building. The goal of the series was to identify where and how a group of like-minded coalition members could make an impact on the national conversation.



Initial Pilot Participants (2012-2015)

- Ahead Inc
- AHC Greater Baltimore
- East Bay Asian Local Development Corporation
- Covenant Community Capital
- CHN Housing Partners
- Commonwealth Land Trust
- Hacienda CDC
- Marquette Management

User of Other Platforms

- NEW Economics for Women FamilySource Center
- Project Open
- Jubilee Housing
- Cheyenne Housing Authority
- Durham Housing Authority
- The Donaldson Group
- Portland Community Reinvestment Initiatives
- Inquilinos Boricuas en Action
- Mutual Housing California
- The Resurrection Project
- Northern Circle Indian Housing Authority

Reporting Directly to One or More Bureau

- New York Housing Authority
- L & M Development Partners
- Housing Works

Esusu Users

- Codman Square Neighborhood Development Corporation
- ISWA Development Corporation
- Foundation Communities
- Mercy Housing Lakefront
- Housing Opportunities, Inc.
- Jamaica Plain Neighborhood Development Corporation
- Westside Housing Organization
- Northwest Oregon Housing Associates
- NeighborWorks Laredo
- Amos House
- Community Development Corporation of Brownsville
- Mercy Housing California
- Home Forward
- Urban Edge
- Avenue CDC Homeownership Center
- Sun Residential
- Tlingit Haida Regional Housing Authority
- Warren Village
- Neighborhood Development Alliance
- Citizen Potawatomi Nation Housing Department
- District of Columbia Housing Authority
- The NHP Foundation
- DeSales Community Development
- Turner Impact Capital
- Dwelling Place of Grand Rapids
- The Neighborhood Developers

Nonprofit Sector

There are number of nonprofit organizations doing important work on improving rent reporting.

One of the leading organizations doing this work is the **Credit Builders Alliance (CBA)**, which is a national nonprofit dedicated to helping organizations move people from poverty to prosperity through credit building. Their Rent Reporting Technical Assistance Center offers tools and training to affordable housing landlords interested in implementing rent reporting. CBA regularly offers pilot program cohorts bringing together landlords. They have worked with providers from Austin, Texas to Juneau, Alaska. In 2017, they worked with the National Association for Latino Credit Asset Builders (NALCAB) and together launched a pilot project to build the credit and financial capability of tenants in affordable rental housing communities that are owned/operated by Latino-serving nonprofit institutions. Their annual credit building symposium.

- **Enterprise Real Estate Equity:** Working with investors to expand and preserve affordable housing, the Real Estate Equity division of Enterprise Community Partners has been incentivizing their partner communities to use rent reporting through their investment practices across their portfolio. Their portfolio impact includes 9,000 income restricted units around the country.

- **Enterprise Residential:** Enterprise Residential is the property management division within Enterprise Community Partners that owns and operates 103 income restricted properties serving 17,000 residents across the Mid Atlantic. They started positive rent reporting in January of 2021 as part of a housing stability initiative and chose to work with Yardi and utilize an opt-out model for their tenants. This initiative has meant a hands-off program for landlords although it only reports only to one credit bureau, Experian, and the program has some trouble collecting impact data.

- **NeighborWorks America:** This national chapter of many regional nonprofits works to drive change at the local level for families and communities. NeighborWorks America has supported rent reporting throughout its network beginning with a rent reporting pilot project in Massachusetts, alongside CBA. They are in the process of standing up a peer group of about six NeighborWorks organizations with active rent reporting for credit building programs to offer them grant funding and technical assistance to grow the service. The overall project is focused on financial capability for Black and Latinx populations.

- **Prosperity Now:** This national advocacy and training nonprofit is working to transform systems, policies, and practices to create an economy that works for everyone. They used their national platform to hold a webinar championing rent reporting for credit building in April 2022.

- **Stewards of Affordable Housing for the Future (SAHF):** is a collaborative nonprofit composed of twelve affordable housing partners working in one or more states, who own more than 149,000 homes. SAHF has been engaged with members and other partners around Rent Reporting since 2017-2018. They worked with CBA to conduct outreach and supported two SAHF members to undergo an assessment and explore different models of rent reporting. In addition, they have been on a Steering Committee for rent reporting and are monitoring the implementation by additional SAHF member organizations as the program expands.

Innovation Highlight: Underwriting for Good

Underwriting for Good is a non-discriminatory automatic underwriting system currently being developed by the Center for New York City Neighborhoods (CNYCN) as a part of the Housing Affordability Breakthrough Challenge (HABC). This financial product includes rent reporting and alternative data, which to date is being applied in a manual system. It acts as a companion, not a replacement, for existing underwriting systems. Underwriting for Good (UFG) is working to automate existing manual alternative credit underwriting processes; leverage financial and non-financial data to better understand a borrower's true ability to repay; and support homeowners with ongoing housing and financial counseling through monitoring and early intervention. It also aims to overcome the challenge of serving underbanked households that may not be served by traditional credit reporting systems.

A challenge being addressed by UFG is applying less conventional and more equitable underwriting practices with an automated system. The UFG innovation meets this challenge and offers an alternative way to tell the compelling underwriting story of a borrower, in a way that is persuasive to a lender to provide that loan or mortgage.

> **“Data is not race-blind: how you collect it and how you process it matters.”**

Working under the assumption that lenders have access to Fannie Mae and Freddie Mac underwriting platforms already (DU and LP), which is the case for larger institutions, CNYCN hopes smaller institutions and non-profits can use the UFG platform. Even for those still using manual underwriting, UFG can be easily implemented and provide better outcomes to the borrowers who may suffer because of delays.

Caren Johnson from CNYCN said that to take part in HABC was exciting, exhilarating, and terrifying. “We have always had theoretical pieces of research being done in this space; this challenge has meant ensuring we are good stewards of transforming those concepts into a product.”

What will UFG mean for low-income clients? For example, an individual who wants to buy a condo, but was denied for a loan from a conventional lender using the Fannie Mae underwriting criteria, could use utilities, banking statements, even payment for a Netflix subscription to supplement their underwriting score by adding that data to the UFG platform. The individual would work with a financial institution that uses UFG, and give them permission to collect this data automatically, instead of going through the time consuming process of individually collecting different statements themselves. Essentially, UFG offers a safe and structured way to meet borrowers where they are. This may mean going around landlords and faceless management companies by working directly with the borrower and their bank statement to verify rental payments.

In this way, UFG also saves the borrower money because the time to process a loan tends to increase interest rates and fees, and the quicker time decreases the risk that another buyer will come in with a bid for the property.

After the two-year Breakthrough Challenge ends, CNYCN plans to talk with non-profits, CDFIs, and any financial institutions who would be interested in the product and hopes to have those lenders pilot the UFG platform with borrowers.

The Center has been involved in conversations around positive rent reporting and ultimately hopes this idea becomes more universal. However, UFG recognizes that perfect uptake doesn't exist and that waiting on landlords might mean the most vulnerable populations gain access last.

Anything that could go wrong disproportionally affects borrowers of color and Underwriting for Good wants to find a fintech solution that cannot just do no harm but also corrects for the inequities in the system.

Federal Entities

Several federal agencies and quasi-governmental entities have control over public policies concerning credit. Many federal-level agencies have studied the impact of rent reporting on credit, and some have produced research papers and implemented pilot programs. Other agencies have developed policies that expand options for renters to report payment history to credit bureaus while some have expanded options via policy within the financial ecosystem that support rent reporting. Below is an overview of each agency's mission and a brief update on their rent-reporting related activities.

- **Federal Housing Administration (FHA):** The FHA provides mortgage insurance on loans made to FHA-approved lenders nationwide, helping with the cost of single-family mortgages, multifamily housing, residential care facilities, or hospitals. FHA loan programs offer lower down payments and are often an important option for first-time homebuyers. FHA does allow lenders to account for rental payment history when the lender performs manual underwriting. Overall, there are barriers that FHA sees to adopting rental payment history data into their automated single-family mortgage underwriting process. The automated underwriting system for the FHA currently relies on "Classic FICO," which does not consider rental payments, and FHA has not announced any plans to migrate to more recent models.

- **Federal Housing Finance Agency (FHFA):** FHFA is the regulator of the Federal Home Loan Bank System and is both the regulator and conservator of Fannie Mae and Freddie Mac. Policy direction from FHFA is important as Fannie Mae and Freddie Mac consider pilot programs on rent reporting for credit. In August 2021, FHFA announced the inclusion of on-time rental payment history in the Fannie Mae underwriting process.

- **Consumer Financial Protection Bureau (CFPB):** The CFPB implements and enforces Federal consumer financial law and ensures that markets for consumer financial products are fair, transparent, and competitive. In May and June 2022, HUD and the CFPB hosted two joint webinars to explore strategies to help HUD-assisted residents build assets, increase financial well-being, and build positive credit histories.

- **U.S. Department of Agriculture Rural Housing Service:** The USDA's Rural Housing Service offers a variety of programs to build or improve housing in rural areas by offering loans, grants and loan guarantees for single-and multifamily housing. The USDA loan guarantee program does not explicitly have a credit score requirement, but most lenders it works with require a score of at least 640, which currently limits the pool of eligible homeowners.

- **Freddie Mac:** Freddie Mac is a publicly traded, government-sponsored enterprise that operates in the U.S. secondary mortgage market. Freddie Mac buys loans that meet certain standards from approved lenders which enables the approved lenders to provide loans to qualified borrowers. In November 2021, Freddie Mac announced an initiative in partnership with Esusu Financial, Inc. to help renters build credit by encouraging operators of multifamily properties to report on-time rental payments to the three major credit-reporting bureaus. Freddie Mac has collaborated with Credit Builders Alliance to support a pilot program with the National American Indian Housing Council (NAIHC) to assist five Tribally Designated Housing Entities (TDHEs) or Tribal Housing Departments (THDs) in initiating rent reporting activities in order to help low-to-moderate income renter households living in tribal lands build credit histories.

- **Fannie Mae:** Fannie Mae is a publicly traded, government-sponsored enterprise that purchases mortgages from lenders and helps facilitate the flow of capital into the housing market by issuing and guaranteeing mortgage-related securities. In August 2021, Fannie Mae **announced** a new automated underwriting system that incorporates consistent rental payment history in credit evaluations which will expand consumer access to mortgage credit.
- **U.S. Department of Housing and Urban Development (HUD):** HUD is the agency responsible for national policy and programs that address America's housing needs, that improve and develop the nation's communities, and enforce fair housing laws. In February 2020, the Office of Policy Development & Research released **research** conducted by HUD and the Policy and Economic Research Council (PERC) that emphasized the potential impact of expanded rent reporting. The results show that including rental history in credit reports could increase the proportions of tenant with scoreable credit histories and with good credit scores, but the change could be detrimental to credit scores for a subset of tenants. In April 2022, HUD **announced** that the Moving to Work (MTW) program would include a cohort of housing authorities that can implement asset building policies. One of the three allowable options, titled the "Credit Building Option," requires housing authorities to report public housing rent payments to credit bureaus with the goal of increasing the credit score of assisted households. In May 2022, HUD hosted a webinar on the MTW expansion asset building cohort to explain the options available to interested housing authorities. In May and June 2022, HUD and the CFPB hosted two joint webinars to explore strategies to help HUD-assisted residents build assets, increase financial well-being, and build positive credit histories.

State-Level Pilot Programs

States are often the laboratory of new policy ideas, and rent reporting is no exception. Colorado and the District of Columbia both have implemented pilot programs to incentivize landlord and tenant participation, coupled with financial education. Of the several pilot programs available right now, most of them take place in urban communities. Rural communities struggle with access to credit particularly for a pipeline to homeownership. As the Colorado pilot program with a variety of property types concludes, it is important to monitor for replicable results in more rural property types.

	Colorado State Pilot Program	District of Columbia Pilot Program	California SB1157 Law
Summary	Colorado "Rent Reporting for Credit" pilot program will have 10 pilot landlords from a variety of property types. Tenants will be required to take a financial education course as part of participation in the program. The program won't charge tenants for participation but will try to encourage 100 percent participation. State funding supports landlord participation and financial education courses are encouraged to be integrated with the program.	D.C. Housing Authority established a pilot program that will allow residents in certain public housing properties to volunteer to have the timeliness of their rent payment reported to one or more of the major credit bureaus. The program can be used to help obtain DC's DPA/closing cost assistance program for first-time homebuyers. It couples with an existing self-sufficiency program (credit building counseling).	A new California state law requires operators of multifamily properties to offer rental payment reporting to any households living in subsidized apartments over 15 units. State Senator Steven Bradford introduced SB1157. Landlords are required to disclose which consumer credit reporting agency they will be working with.
Time Period	Began Fall 2021	Started enrolling residents in fall 2020. 12-month implementation period, 3-month deadline for reporting to City Council.	Went into effect July 1, 2021. Expire or be renewed in 2025.
Budget	$205,000 budgeted to the Colorado Housing and Finance Agency for program, will be contracted to a third party.	Estimated total cost of $156,755; including $116-118,000 for a full-time rent reporting manager; $15,000 for a consultant and $17,000 for outreach and education, plus fees to the credit bureaus.	For California, Experian is offering no-cost reporting, and other options may be available with different costs, but the California law requires that tenants pay no more than $10 per month.

Key Considerations for Implementation

There are several up-front considerations before implementing a rent reporting for credit program. Understanding the different costs, a property's funding structure, and resident's needs or willingness to participate will help implement successfully.

Opt-In vs. Opt-Out

One of the key points of discussion in the rent reporting pilot space is how to engage residents in the process. There are essentially two options. Residents can either proactively choose to have their landlord share rental payment history information with the credit bureau, and effectively "opt-in" to having the landlord submit this information. Or the landlord can submit rental payment history to the credit bureau for all residents and give those who do not wish to have their information shared the choice to "opt-out". The key issue is the sharing of data between entities, something that is protected by the Federal Privacy Act.

This is also an important consideration for housing providers that receive federal subsidy. If a property receives any federal subsidy from HUD, or if the tenants living in the property receive HUD rental assistance vouchers, the property must use the opt-in method. The combination of current HUD regulations and the Federal Privacy Act essentially require that the resident give permission for their positive payment history to be reported to credit agencies. Residents need to provide informed consent and give permission in writing that the landlord can share their rent payment information with the credit bureaus.

One of the benefits of the "opt-in" approach is that residents are engaged in the process and are given the opportunity to learn about how rent reporting can impact their credit score. The process of explaining why the resident needs to give permission and getting their signature on the informed consent form, is often a key opportunity to engage residents, build trust, and share information about why rent reporting could be a powerful tool. Affordable housing providers sometimes offer financial education classes or coaching programs as a service in conjunction with rent reporting.

One of the benefits of the "opt-out" approach is that all residents are enrolled automatically but are given a very clear option to unenroll if they choose. This allows for larger numbers of residents to receive the benefits of rent reporting and cuts down on the amount of time to get rent reporting started at a property. For properties that do not receive federal subsidy, this is an effective and efficient way to implement rent reporting on a larger scale.

Positive Only vs. Full-File Reporting

Another important choice when setting up a rent reporting program, is to understand what type of rent payment information the landlord will send to the credit bureaus. There are essentially two options: sending just the positive rental payment history (positive-only reporting) or sending all payment history to the credit bureaus (full-file reporting).

An important benefit of positive-only reporting is that it creates a very low risk for negative impact on residents and their credit scores. With this approach, the landlord will only send information about on-time rental payments and will leave out anything considered "negative" like missed or late payments. Importantly, credit bureaus accept this type of reporting. There are considerations that the landlords will need to make to define when something is considered on-time and when it moves into a late payment or delinquent category. These timelines can vary by landlord and may also vary by state or local law.

Full-file reporting means the landlord sends all rent payment information to the credit bureaus. This can increase the credibility for the predictiveness of the tradeline. This is the traditional approach to credit reporting and gives a full picture of the renter's profile. The October 2019 **HUD study** examines the question: what if public housing agencies provided the "full file" rental payment history of all tenants to credit reporting agencies, including histories of on-time, late, and omitted payments? This would put renters on par with homeowners with a mortgage, who almost universally have this full file payment history reported to the credit agencies each month. Specifically, the HUD study found that adding full-file payment history raised credit scores for 23% of tenants and reduced scores for 20% of tenants under one model, while raising scores for 61% and reducing scores for 22% under the other. The study found the majority of renters benefitted from full-file reporting.

Housing providers also have the option to create their own software and report directly to the credit bureaus. This works in some examples of larger property owners, such as in New York City, and can allow long-term savings and customization if an organization has the available capacity. However, many organizations still choose to partner with a software service provider for ease of implementation.

Yardi	Yardi is a private software management company that many affordable and market rate landlords use to manage tenants. Yardi is now offering an opt-in service to positively report rent payments through Experian. It has limited costs: tenants can sign up to have their rental payment history reported to Yardi and property managers who report this data gain access to more information about potential tenants. Landlords using YARDI can choose to use this approach to report rent payments. YARDI does not provide or include credit counseling or other financial education services for tenants.
Esusu	Esusu is a private market software service that enrolls renters in a rental reporting for credit program for an individual fee - meaning that an individual renter can sign up on their own. Esusu is explicitly mission-driven and seeks to create tools that cultivate financially healthy communities and support a vision of equitable financial access for everyone. As a private market business, Esusu costs $50 a year for individuals, and additional fees for background reports and for landlords.
Credit Rent Boost	Credit Rent Boost is a commercial LLC that advertises its services to report rental payments directly to Equifax and TransUnion by first verifying your ID, landlord, and rent payments. Separately they offer reporting for past rental history up to two years. The average subscriber increases their credit score by 30-100 points. For renters, ongoing rent reporting is as low as $3.75 /month and past rent reporting for $2.50, with additional pricing offered for landlords.
Rent Track	Rent Track is another software program that reports payment history to all three credit bureaus: Experian, Equifax, and TransUnion. Their program is geared towards customized setup for landlords and incentive programs for tenants. Rent Track charges a fee to tenants of between $1 and $2 per resident per month, with no set up fees. There is no tie to coaching or financial education but there are additional features focused on identity protection.

Conclusion

Having a credit profile is essential to taking part in the American economy, especially for renting and homeownership markets. A plethora of organizations in the private market, nonprofit industry, and agencies at the state and federal level have laid the foundation for transitioning the credit system to include positive rent reporting. Credit building should not just be about homeownership anymore, since there are multiple proven ways to give renters credit for the rent they pay.