

This article, which will be updated as developments warrant, lists actions Congress, governors, federal and state agencies, and businesses are taking to protect consumers in light of the COVID-19 epidemic. These actions include suspensions on foreclosures, evictions, and terminations of telecommunications and utility service, elimination of interest and forbearance on student loan payments, limits on debt collection, and more.

This article is limited to actions and orders that have been officially announced as final decisions. For information about actions that have been proposed by NCLC, other organizations, or members of Congress, see [NCLC's web page on COVID-19 & Consumer Protections](#) [1].

Because of the rapidly changing reactions to the current epidemic, this list cannot be complete, but an effort has been made to be as up to date as possible. Readers are encouraged to email publications@nclc.org with additional protections that have been enacted in their state, county, or municipality.

NCLC during this emergency is making available to the public *for free* the digital version of NCLC's most popular publication, [Surviving Debt](#) [2] (2020).

[Just click here.](#) [2] *Surviving Debt* is geared for consumers, counselors, paralegals, and attorneys new to consumer law. The 288-page book explains steps that families in financial distress can take concerning foreclosures, repossessions, utility terminations, landlord evictions, debt collection, medical debt, student loans, credit reporting, credit cards, criminal justice debt, and a number of other topics of special current interest.

NCLC is also providing during the emergency deep discounts on our consumer law treatises, which are all available in print and digital formats. The first chapter of each treatise's digital version is also available free to the public. For more details, [go here](#) [3].

The Coronavirus Aid, Relief, and Economic Security Act or the "CARES Act," Pub. L. No. 116-136

[The CARES Act](#) [4] was signed into law on March 27, 2020. This article describes the main CARES Act provisions affecting consumer protection and links to specific Act provisions. This article also lists many actions by state governors, federal and state agencies, businesses and others that provide consumer protections during this crisis.

Federal Foreclosure and Eviction Suspensions; Mortgage Loan Forbearance

CARES Act Relief from Foreclosure: [CARES Act § 4022](#) [5] provides foreclosure relief for "federally-backed loans," which means loans (for 1–4 family properties) purchased, securitized, owned, insured, or guaranteed by Fannie Mae or Freddie Mac, or owned, insured, or guaranteed by FHA, VA, or USDA. See [§ 4022\(a\)\(2\)](#) [5]. To determine if a mortgage loan is "federally-backed," see "Determining If a Mortgage Loan is Federally Backed," *infra*. About one-third of residential mortgages are not federally backed and thus not covered by the CARES Act. These homeowners (and tenants) will have to rely on future federal action or state orders, described at "State Limitations on Foreclosures and Evictions," *infra*, or on voluntary actions by mortgage servicers.

Under the CARES Act, a servicer of federally backed mortgage loan may not: initiate any judicial or nonjudicial foreclosure process, move for a foreclosure judgment, order a sale, or execute a foreclosure-related eviction or foreclosure sale. The provision lasts for not less than the sixty-day period beginning on March 18, 2020. This provision is not limited to borrowers with a COVID-19 related hardship. See [§ 4022\(c\)\(2\)](#) [5].

Under the CARES Act, homeowners with federally backed mortgage loans affected by COVID-19 can request and obtain forbearance from mortgage payments for up to 180 days, and then request and obtain additional forbearance for up to another 180 days. During a period of forbearance, no fees, penalties, or interest shall accrue on the borrower's account beyond the amounts scheduled or calculated as if the borrower made all contractual payments on time and in full under the terms of the mortgage contract. The covered period appears to be during the emergency or until December 31, 2020, whichever is earlier. See [§ 4022\(b\), \(c\)\(1\)](#) [5].

CARES Act Forbearance Rights for Multi-Family Properties (5 or more units) and Rights of Their Tenants: The Act

provides for different forbearance rights for owners of multi-family property, and also provides that tenants are protected from eviction if the owner seeks such forbearance. See [CARES Act § 4023](#) [6].

CARES Act Protections Against Eviction: During the 120-day period beginning on the Act's March 27, 2020 enactment date, the lessor of a "covered dwelling" may not file a court action for eviction or charge additional fees for nonpayment of rent. See [CARES Act § 4024\(b\)](#) [7]. After that 120-day period, the lessor cannot require the tenant to vacate until it gives the tenant a thirty-day notice to quit. See [§ 4024\(c\)](#) [7]. A covered dwelling is one where the building is secured by a federally backed mortgage loan or participates in certain federal housing programs. See [§ 4024\(a\)](#) [7]. A large number of governors have also initiated suspensions of all residential evictions in their states, as listed *infra*.

For help to see if a tenant qualifies for CARES Act protections because Fannie or Freddie back the owner's mortgage, use [Fannie Mae's Multifamily Loan Lookup Tool](#) [8] and [Freddie Mac's Multifamily Loan Lookup Tool](#) [9]. A tenant listed in neither may still qualify for CARES Act or state protections. Renters found in the lookup tools can get support at the Fannie Mae Helpline at 877-542-9723 or the Freddie Mac Helpline at 800-404-3097.

Analysis of CARES ACT Eviction Protections: The National Housing Law Center has issued an analysis of federal and state eviction suspensions, ["Enforcing Eviction Moratoria: Guidance for Advocates"](#) [10] (April 3, 2020).

Determining if a Mortgage Loan Is Federally Backed: The CARES Act foreclosure and forbearance provisions apply only to "federally backed mortgages." In addition, prior to CARES Act enactment different federally backed mortgage investors had announced different foreclosure policies (*see* "Links to Foreclosure Suspensions by Federally Backed Mortgage Investors in Effect Prior to the CARES Act," *infra*). It is thus imperative to determine if a loan is federally backed and which investor is the backer: Fannie Mae, Freddie Mac, Federal Housing Administration (FHA), Veterans Affairs (VA), and the U.S. Department of Agriculture's Rural Home Service (RHS). The following tools let one quickly determine which investor backs a particular homeowner's mortgage loan.

- Fannie Mae and Freddie Mac have easy loan look-up websites to determine if they own a mortgage. See <https://ww3.freddiemac.com/loanlookup/> [11] and <https://www.knowyouroptions.com/loanlookup#> [12].
- To determine if a loan is FHA-insured, look for an FHA case number on the mortgage document, specific language in the mortgage and note forms, or through the payment of an FHA premium on the mortgage statement. In some cases, unfortunately, loans may have been stripped of their FHA-insured status; call HUD's National Servicing Center at 877-622-8525 if there are questions.
- A VA-guaranteed loan also has specific language in the note and mortgage identifying it as a VA loan, and there are fees paid to the VA noted in closing documents.
- While a borrower with a mortgage directly extended by the RHS will be very familiar with the agency, homeowners with privately serviced RHS-guaranteed loans often do not know the loan's status. If an RHS-guaranteed loan is suspected, directly ask the servicer to review the homeowners' closing documents.

Links to Foreclosure Suspensions by Federally Backed Mortgage Investors in Effect Prior to the CARE Act:

FHA — <https://www.hud.gov/sites/dfiles/OCHCO/documents/20-04hsgml.pdf> [13]

VA — https://www.benefits.va.gov/HOMELOANS/documents/circulars/26_20_8.pdf [14]

USDA Direct (bottom of page 1) —

https://www.rd.usda.gov/sites/default/files/USDA_SA_COVID19_SFHCContinuity03202020.pdf [15]

USDA Guaranteed —

https://www.rd.usda.gov/sites/default/files/USDA_RD_SA_Foreclosure_and_Eviction_Relief_COVID19_NationalEmergency.pdf [16]

Fannie Mae — <https://singlefamily.fanniemae.com/media/22261/display> [17]

Freddie Mac — <https://guide.freddiemac.com/app/guide/bulletin/2020-4> [18]

Banking Agency Guidance on Mortgage Servicing and Loan Modifications

Federal Reserve, FDIC, NCUA, OCC, CFPB, and the Conference of State Bank Supervisors have issued an [Interagency Statement on Loan Modifications and Reporting for Financial Institutions Working with Customers Affected by the Coronavirus \(March 22, 2020\)](#) [19].

State Limitations on Foreclosures and Evictions

[A state-by-state list of eviction moratoria](#) [20] is now published by the National Housing Law Project, researched by students at Columbia and University of Pennsylvania. It includes 24 categories of information concerning eviction for each state.

Analysis of CARES ACT Eviction Protections: The National Housing Law Center has issued an analysis of federal and state eviction suspensions, [“Enforcing Eviction Moratoria: Guidance for Advocates”](#) [10] (April 3, 2020).

Self-help and advocate eviction pleadings and forms: Go to lawhelpinteractive.org [21], click on the state on the map and search for self-represented or advocate materials. If there are forms available, you will be referred to the LSC-approved or court-approved websites where all forms are listed. Some states also have eviction expungement forms.

[The Anti-Eviction Mapping Project](#) [22] has a listing of enacted and pending state and local actions related to evictions.

Regional Housing Legal Services has an [updated list of tenant protections](#) [23] during the emergency.

The Eviction Lab also has [detailed state-by-state listings](#) [24] regarding renter protections during the emergency.

[Alaska](#) [25] has halted all court eviction hearings.

Alabama (non judicial foreclosure): [Governor’s Sixth Supplemental State of Emergency Proclamation](#) [26] (April 3, 2020) suspends enforcement of eviction for nonpayment of rent or mortgage payments for duration of public health emergency declaration or further order.

Alaska (nonjudicial foreclosure): [Senate Bill 241](#) [27] includes a moratorium on evictions (sec. 21) and foreclosures (sec. 24).

California (nonjudicial foreclosure): California Judicial Council issued [California Rules of the Court Emergency Rules](#) [28] (April 6, 2020) to effectively ban judicial foreclosures and evictions until 90 days after the state of emergency has been lifted.

California (nonjudicial foreclosure), [Executive Order N-28-20 from Governor](#) [29] (March 16, 2020), effective to March 31, 2020: Suspends state preemption of local government regulation of evictions, including post-foreclosure evictions. Localities may restrict evictions in cases where nonpayment was caused by income reduction or increased household expenses.

California [Governor’s Executive Order N-37-20](#) [30] (March 27, 2020): Orders a state-wide moratorium on evictions through May 31, 2020.

Colorado (nonjudicial foreclosure authorized by court), [Governor’s Executive Order 2020-12](#) [31] (March 20, 2020), effective for 30 days, extends for 30 days the deadlines to cure and to redeem under Colorado foreclosure statute.

Connecticut (judicial foreclosure), [Statement from Chief Court Administrator](#) [32] (March 18, 2020): All foreclosure sales previously scheduled to occur in April or May 2020 rescheduled to June 6, 2020. The judgment in any foreclosure action in which the court set a redemption period to expire during April or May 2020 is amended to set the expiration date for June 2, 2020. The execution of ejectment judgments is stayed through March 27, 2020. Civil trials, trial management conferences, pretrial and status conferences, and mediations cancelled until further notice.

Delaware (judicial foreclosure): [Governor’s Sixth Modification of Mar. 12, 2020 Declaration of State of Emergency](#) [33] (Mar. 24, 2020) prohibits commencement of foreclosures and late fees or excess interest for missed payments during the state of emergency. For pending foreclosures, sheriff sales, actions for ejectment, all actions and all deadlines extended at least until thirty-one days after the state of emergency. Extended until further notice by [Governor’s Fourteenth Modified Declaration of State of Emergency](#) [34], April 30, 2020.

District of Columbia: [D.C. Act 23-286](#) [35] Section 202 (April 13, 2020) creates a forbearance program similar to the CARES Act but with additional provisions. Section 203 suspends evictions, rent increases, and other actions against tenants.

District of Columbia (evictions): [The D.C. Superior Court Corona Virus Advisory](#) [36] (Mar. 13, 2020) suspends evictions of all tenants and foreclosed homeowners.

Florida (judicial foreclosure): [Governor's Executive Order No. 20-94](#) [37] (April 2, 2020) suspends and tolls operation of Florida foreclosure statutes for 45 days. Chief judge of each judicial district has authority to define the scope of the stay of foreclosure related proceedings due to the COVID-19 pandemic.

Florida (judicial foreclosure): [Administrative Order 12.510 – 04/2020.8 of the Circuit Court of the 15th Judicial Circuit for Palm Beach County](#) [38] (April 6, 2020) suspends foreclosure proceedings as non-essential and cancels all scheduled foreclosure sales up to and including May 29, 2020.

Florida (judicial foreclosure): [Administrative Order 2020-01 19th Judicial Circuit](#) [39] (March 19, 2020) stays foreclosure proceedings as non-essential and cancels all scheduled foreclosure sales until further court order.

Florida, Duval County (judicial foreclosures): [Court order](#) [40] (March 27, 2020, effective through April 3, 2020) suspends all foreclosure sales ordered by courts in Duval County and stays execution on all writs of possession or writs of eviction.

Illinois: [Governor's Executive Order No. 2020-10](#) [41] (Mar. 20, 2020): Suspends all enforcement of orders of eviction for residential premises through Apr. 7, 2020. Extends the eviction restriction through May 29 by [Executive Order No. 2020-30](#) [42] (April 23, 2020) and continued and clarified by [Executive Order No. 2020-33](#) [43] (Apr. 30, 2020).

Indiana (judicial foreclosure), [Governor's Executive Order](#) [44] (March 19, 2020): Public health emergency declared to April 5, 2020. No residential eviction proceedings or foreclosure actions to be initiated during the declared public health emergency.

Iowa (judicial foreclosures), [Governor's Proclamation of a Disaster Emergency](#) [45] (March 22, 2020): Temporarily suspends the commencement of foreclosure proceedings, or the prosecution of ongoing foreclosure proceedings, on residential, commercial, and agricultural real property located in the state, at least through April 16, 2020. The suspension also covers land contract forfeitures and removal actions for property tax deed foreclosures.

Iowa (judicial foreclosure): [Governor's Proclamation](#) [46] (March 22, 2020) and [Executive Proclamation of Disaster Authority](#) [47] (April 2, 2020) suspend new and pending foreclosure proceedings on residential, commercial and agricultural property, and extended through May 27 by [Governor's Proclamation](#) [48] (April 27, 2020).

Iowa (judicial foreclosure): [Governor's Proclamation of Disaster Emergency](#) [49] (April 24, 2020): Suspends actions to seize agricultural property.

Kansas (judicial foreclosures), [Governor's Executive Order 20-10](#) [50] (March 23, 2020): Suspends new foreclosure proceedings and evictions, but does not affect pending foreclosures, extended by [Governor's Executive Order No. 2020-28](#) [51], (April 30, 2020) through the earlier of May 31 or until State of Disaster Emergency expires.

Kentucky (evictions), by [Governor's Order 2020-257](#) [52] (March 25, 2020): All evictions are suspended, and all government officers are directed to cease enforcement of eviction orders for the duration of the emergency.

Kentucky (evictions): [Supreme Court Amended Order 2020-22](#) [53] (April 14, 2020): Suspends eviction hearings until June 30 2020.

Maine (judicial foreclosure), [Emergency Order and Notice Maine Supreme Court](#) [54] (March. 18, 2020, effective to May 1, 2020): No proceedings will be scheduled or heard for foreclosure and eviction cases, and actions to recover personal property, and extended through May 15 by [State of Maine Judicial Branch Revised Emergency Order and Notice PMO-SJC-1](#) [55] (April 22, 2020).

Maine (judicial foreclosure), [Emergency Order Maine Superior and District Court](#) [56] (March 17, 2020): Until further order of court 49 days added to unexpired deadline established by court order or court rule, but does not extend statutory deadlines or limitations.

Maryland (judicial authorization for nonjudicial foreclosure), [Administrative Order Maryland Court of Appeals suspension of evictions and foreclosures during Covid-19 emergency](#) [57] (March 18, 2020): Residential foreclosures and foreclosure of right to redeem after tax sale pending in circuit courts stayed effective immediately. Same for pending and

scheduled evictions. New residential foreclosures and foreclosures of right to redeem after tax sales “shall be stayed upon filing.” Order to be revised “as circumstances warrant.”

Maryland (judicial authorization for nonjudicial foreclosure): [Order of Chief Judge of Maryland Court of Appeals](#) [58] (March 25, 2020) stays initiation and pending proceedings related to residential foreclosures, foreclosure of the right of redemption after tax sales, and actions to recover possession of residential properties.

Maryland (judicial authorization for nonjudicial foreclosure), [Governor’s Executive Order 20-04-03-01](#) [59] (April 3, 2020) orders a moratorium on evictions and foreclosures.

Massachusetts (nonjudicial foreclosure): [House Bill 4647](#) [60] (signed into law April 20, 2020) suspends evictions and foreclosures and offers mortgage forbearance lasting for various periods after termination of the emergency. [ACA International v. Healey](#) [61] (D. Mass. May 6, 2020) entered a temporary restraining order enjoining enforcement of regulation provisions that ban debt collectors’ telephonic communications with consumers and that bar debt collectors from bringing collection lawsuits. Not affected are other parts of the regulation prohibiting garnishment, repossessions, in-person visits or other creditor remedies.

Michigan (non-judicial foreclosure): The Governor and Department of Insurance and Financial Services announced on April 23, 2020 the [MiMortgage Partnership Program](#) [62] with a list of participating financial institutions that have agreed to a voluntary plan protecting homeowners: 60-day moratorium on foreclosures and a streamlined process to apply for a 90-day forbearance, and for those homeowners, no late fees or adverse credit reporting.

Michigan (nonjudicial foreclosure), [Governor’s Executive Order 2020-19](#) [63] (March 20, 2020, effective April 17, 2020): Bars execution of eviction process against tenants, vendees under executory contracts (installment land sale contracts) and manufactured home owners. Does not specifically reference post-mortgage foreclosure evictions.

Michigan (nonjudicial foreclosure), [Governor’s Executive Order 2020-14](#) [64] (March 18, 2020): Temporarily suspends tax sale redemption deadline from March 31, 2020 until the later of (a) May 29, 2020 or (b) 30 days after the termination of the state of emergency.

Minnesota (evictions and request foreclosures): Governor’s [Emergency Executive Order 20-14](#) [65] (March 23, 2020), stops new and pending evictions and requests a suspension of foreclosures, beginning March 24.

Mississippi (evictions): [Governors Executive Order No. 1465](#) [66] (March 31, 2020) suspends all enforcement of evictions in Lauderdale County through April 14, 2020.

Montana (non-judicial foreclosures): Governor’s [Directive Implementing Executive Orders 2-2020 and 3-2020 providing measures to limit foreclosures, evictions, and disconnections from service](#) [67] (March 30, 2020): Effective through April 10, but now extended through at least April 24, 2020, suspends evictions, tenancy non-renewals (requiring at least month-to-month tenancies), late fees, rent increases, credit reporting for non-payment, foreclosure sales, other foreclosure actions, or foreclosure-related evictions.

Nevada (non-judicial foreclosure): [Governors Declaration of Emergency, Directive 008](#) [68] (March 29, 2020) prohibits initiation of lockouts, notices to vacate, notices to pay or quit, evictions, foreclosures, or other actions may be initiated until emergency terminates.

New Hampshire (nonjudicial foreclosure), [Governor’s Emergency Order No. 4 pursuant to Executive Order No. 4 Temporary Prohibition on Evictions and Foreclosures](#) [69] (March 17, 2020) prohibits all forms of foreclosure during emergency declaration. Initiation of foreclosure proceedings suspended for duration of declared emergency. Modified by [Governor’s Emergency Order No. 24](#) [70] (April 3, 2020).

New Jersey (judicial foreclosure): [Governor’s Executive Order No. 106](#) [71] (March 19, 2020) suspends evictions and enforcement of eviction orders (allowing proceedings to continue up to that point), effective until at least two months after the emergency expires.

New Jersey (judicial foreclosure), the [Department of Banking and Insurance](#) [72] announced on March 28, 2020 that Citigroup, JP Morgan Chase, US Bank, Wells Fargo, Bank of America, and over forty other federal and state-chartered banks, credit unions, and servicers have committed to allowing homeowners to apply for a ninety-day grace period on mortgage payments and a waiver of late fees, and the institutions will not start any foreclosures or evictions for sixty days. Overall, this

voluntary agreement appears to be weaker than what the CARE Act requires the banks to do for federally related mortgages.

New Mexico (manufactured home park evictions): The New Mexico Supreme Court has issued order No. 20-8500-008 4, [In the Matter of the Stay Of Writs of Restitution Issued under the Mobile Home Park Act 7 During the Covid-19 Public Health Emergency](#) [73] (March 26, 2020) staying all manufactured home park evictions and foreclosures during the emergency.

New York (judicial foreclosure): The Governor's [Executive Order 202.8](#) [74] (March 20, 2020) mandates "there shall be no enforcement of either an eviction of any tenant residential or commercial, or a foreclosure of any residential or commercial property for a period of ninety days." Tolls wide range of time limits until April 19, 2020, including "any specific time limit for the commencement, filing, or service of any legal action, notice, motion, or other process or proceeding, as prescribed by the procedural laws of the state, including but not limited to . . . the civil practice law and rules". Also tolls until April 19, 2020 all time limits set by "any other statute, local law, ordinance, order, rule, or regulation, or part thereof".

New York (judicial foreclosure): A [March 15, 2020 Memorandum](#) [75] from Chief Administrative Judge of the Court ordered that, "Effective March 16, all eviction proceedings and pending eviction orders shall be suspended statewide until further notice." In addition, [New York Office of Court Administrator's Order No. 78](#) [76] (March 22, 2020) directs court clerks not to accept filings in non-essential cases "until further order." Foreclosure cases are deemed non-essential cases.

New York (judicial foreclosure): [New York State Department of Financial Services New Part 119 to 3 NYCRR Emergency Relief for New Yorkers Who Can Demonstrate Financial Hardship As a Result of Covid-19](#) [77] (March 24, 2020), effective to April 20, 2020 and any subsequent renewal period, establishes "Covid-19 Relief Program." Regulated entities must make "widely available" to New York borrowers demonstrating financial hardship caused by COVID-19 a forbearance of ninety days. Federally guaranteed and GSE loans are exempted. Within ten business days regulated institutions must provide an application process for borrowers. Issued in response to [Governor's Executive Order 202.9](#) [78] (March 21, 2020).

North Carolina (judicial foreclosure), [Order of Supreme Court](#) [79] (March 19, 2020): Extends deadlines for filing pleadings, motions, notices, other documents and performing required "acts" in civil proceedings, including "special proceedings" (foreclosure proceedings) until April 17, 2020. Effect is to delay to April 17, 2020 the completion of foreclosure sales not finalized as of March 16, 2020.

Oregon (evictions), [Governor's Executive Order 20-11](#) [80] (March 22, 2020) places a ninety-day hold on evictions for non-payment of rent.

Pennsylvania (judicial foreclosure): [Supreme Court Order of Statewide Judicial Emergency](#) [81] (March 19, 2020), deadlines for filing legal papers due between March 19, 2020 to April 3, 2020: During this period no state official may effectuate an eviction, ejection, or other displacement from a residence for nonpayment of rent or a loan. Allows filing requests for orders of possession. Extended until May 11 by [Supreme Court Emergency Order of Statewide Judicial Administration](#) [82] (April 28, 2020).

Puerto Rico: [R.C. del S. 489](#) [83] (March 24, 2020) requires forbearance on mortgage loans if homeowner requests.

Rhode Island (evictions): [Governor's order](#) [84] (March 19) that state courts will not process any eviction proceedings for thirty days.

South Carolina (judicial foreclosure): [Order of Supreme Court of South Carolina, Re: Statewide Evictions and Foreclosures](#) [85] (March 18, 2020): Orders statewide moratorium on foreclosure hearings, foreclosure sales, writs of ejection, all matters relating to foreclosures until further order of Chief Justice. Suspension ends on May 15, by [Order No. 2020-4-30-02 of Supreme Court of South Carolina Re: Statewide Evictions and Foreclosures](#) [86] (April 30, 2020).

Texas (evictions): [Texas Supreme Court order](#) [87] (March 20, 2020).

Texas (nonjudicial foreclosure): [Texas Supreme Court Emergency Order No. 20-9052](#) [88] (April 6, 2020), effective to April 30, 2020 suspends eviction and forcible detainer actions filed against occupant of property after foreclosure. Extends the order through May 25 by [Texas Supreme Court Twelfth Emergency Order No. 20-9059](#) [89] (April 27, 2020).

Washington State (evictions) [Governor's Executive Order 20-19](#) [90] (March 18, 2020) orders a statewide hold on evictions for non-payment or where the tenancy has ended, until April 17, 2020.

Washington, D.C.: [Judiciary orders](#) [91] suspends evictions of all tenants and foreclosed homeowners from March 14 to May 15; continued hearings on Small Claims, Debt Collection, Mortgage Foreclosure, Housing Court.

Wisconsin (judicial foreclosures): [Governor's Emergency Order #15](#) [92] (March 22, 2020) provides that for sixty days: mortgagees are prohibited from commencing civil actions to foreclose upon real estate, and from requesting or scheduling a sheriff's sale of the mortgaged premises; sheriffs may not act on any order of foreclosure or execute any writ of assistance related to foreclosure.

Federal Changes re Appraisals for Mortgage Loans

Fannie Mae, Freddie Mac, FHA, and VA to allow appraisals without interior inspections:

- Fannie Mae: [Lender Letter \(LL-2020-04\) \(Mar. 23, 2020\)](#) [93]
- Freddie Mac: [Bulletin 2020-5](#) [94]
- VA: Circular: [26-20-11](#) [95]
- FHA: [Mortgagee Letter 2020-05](#) [96]

The USDA [97] has waived or relaxed certain parts of the application process for Single-Family Housing Direct Loans, including site assessments, and has extended the time period that certificates of eligibility are valid.

Federal Bank Regulators [have announced](#) [98] (April 14, 2020) relaxation of appraisal rules.

National Credit Union Administration has issued an [interim final rule](#) [99] relaxing the appraisal process.

The Appraisal Institute [100] and the [Appraisal Foundation](#) [101] have extensive information on how COVID-19 is affecting appraisers.

Student Loans, Other Debts Owed to the Government

CARES Act Relief for Federal Student Loan Borrowers: [CARES Act § 3513](#) [102] provides relief for student loan borrowers with Direct Loans and also for FFEL loans, but only those FFEL loans currently owned by the U.S. Department of Education. Critically, not protected by the CARES Act are borrowers with Perkins Loans and borrowers whose FFEL loans are still held by banks or guaranty agencies. One estimate is that this is upwards of 9 million student loan borrowers not covered by the Act.

Direct Loan and covered FFEL borrowers will have their payments suspended through September 30, 2020. See [CARES Act § 3513\(a\)](#) [102]. While student loan payments are suspended, the loans shall not accrue any interest and the month of a suspended loan payment will be treated as if a loan had been made for purposes of loan forgiveness and loan rehabilitation. See [§ 3513\(b\), \(c\)](#) [102]. The suspension period will result in no negative credit reporting and also involuntary collection of the loan will be suspended—no wage garnishments, tax intercepts, offset of federal benefits, or any other collection activity. See [§ 3513\(d\), \(e\)](#) [102]. Covered borrowers will be provided notices of all of these rights within fifteen days of the CARES Act's March 27 enactment. See [§ 3513\(g\)](#) [102]. For more detail, [see this article](#) [103] from NCLC's Student Loan Borrower Assistance website.

Department of Education Emergency Policy Prior to the CARES Act

[Department of Education Press Release](#) [104] (March 20, 2020): All borrowers with federally held student loans will automatically have their interest rates set to 0% for a period of at least 60 days. In addition, each of these borrowers will have the option to suspend their payments for at least two months to allow them greater flexibility during the national emergency. This will allow borrowers to temporarily stop their payments without worrying about accruing interest. For more detail about the suspension of interest charges and payment forbearance, [see this article](#) [105] from NCLC's Student Loan Borrower Assistance site.

[Department of Education, Coronavirus and Forbearance Info for Students, Borrowers, and Parents](#) [106]: Includes more detail on the suspension of interest accrual and loan payments, with additional Q & A on other topics relevant to students in school, student loan borrowers, and their parents.

[Relief for Private Student Loan Borrowers](#) [107]: A number of state attorney general offices and twenty private student loan lenders have reached agreement on a program to offer the following forms of relief for private student loan borrowers: minimum of ninety days of forbearance, waiving late payment fees, ensuring that no borrower is subject to negative credit reporting, ceasing debt collection lawsuits for ninety days, and working with borrower to enroll them in other borrower assistance programs, such as income based repayment.

Treasury Offset Program [Technical Bulletin # F2020-7](#) [108] (March 26, 2020): Effective immediately, the U.S. Department of the Treasury has exempted the Social Security Administration's (SSA) benefit payments from offset. This exemption will remain in effect through September 21, 2020. During this time, SSA benefit payments will not be offset to satisfy delinquent federal non-tax debts in the U.S. Treasury Offset Program. This is largely duplicative of CARES Act student loan provisions for Direct Loan and certain FFEL student borrowers, but protects other student loan borrowers and others owing government debts, such those owing mortgage deficiency judgments arising from FHA loans. For more on federal government collection of debts, See **[NCLC's Collection Actions Chapter 10](#)** [109].

Protection of CARES Act Payments to Individuals: The CARES Act provides for \$1200 payments to many Americans with an additional \$500 for each child. These amounts are generally protected from seizure by the United States for debts owed to the United States. See **[CARES Act § 2201\(d\)](#)** [110].

State Actions Regarding Utility Service and Telecommunications

Suspension of Lifeline Terminations. The FCC, **[In the Matter of Lifeline and Link Up Reform and Modernization](#)** [111], WC Docket No. 11-42 (March 30, 2020) waives certain rules so as to ensure that consumers enrolled in the Lifeline program do not lose access, at least until May 29, 2020. The Lifeline program provides qualifying low-income consumers discounts on voice or broadband Internet access service. The FCC is suspending rules that are the most common reasons for consumers to lose Lifeline access: the usage requirement and general involuntary de-enrollment procedures, and recertification and reverification rules. To ensure existing Lifeline subscribers do not lose service, the order directs the Universal Service Administrative Company to pause any involuntary de-enrollment of existing subscribers.

Free and low cost broadband: For information on company voluntary offers, see **[here](#)** [112] and **[here](#)** [113].

State Utility Commission Suspension of Utility Disconnections: Almost half the states have imposed a moratorium on utility terminations. The list is growing, but as of now government bodies have ordered disconnection suspensions statewide in:

- Alaska;
- Arizona (cooperative agreement with the state's largest electric utilities);
- California;
- Connecticut;
- District of Columbia;
- Illinois;
- Indiana;
- Iowa;
- Kansas;
- Kentucky;
- Louisiana;
- Maine;
- Maryland;
- Massachusetts;
- Mississippi;
- Montana;
- New Hampshire;
- New Jersey;
- New York;
- North Carolina;
- Ohio;
- Pennsylvania;
- South Carolina;

- Vermont;
- Virginia;
- West Virginia (regulators are “urging” utilities to suspend disconnections); and
- Wisconsin.

In addition, [click here](#) [114] to see statements from every state utility commission as to its policy re COVID-19 and disconnections. This state tracker is being updated frequently. Additional updated information can be [found here](#) [115].

Important Note re Municipal Utilities and Rural Electric Cooperatives (RECs): In a few states, the state PUC’s billing and termination rules apply to municipals, but, as a general rule, municipal utilities and RECs are not regulated by the state’s PUC. Whether the above state PUC utility termination suspension orders apply to municipal utilities and RECs depends on the state, who issued the order, that state’s emergency laws, and the wording of the proclamation order.

These unregulated utilities would be covered if the order is issued by a governor, and that state’s laws give the governor broad enough power to cover not just the regulated companies but virtually any business, and if the wording of the order/proclamation makes it clear that it applies to ALL utility providers. In addition, municipal utilities may abide voluntarily by a state suspension order even if it is not legal binding on them, or may on their own decide to suspend terminations. For example, Anchorage Alaska’s water and wastewater utility and Anchorage’s Municipal Light & Power have declared a moratorium on all shutoffs.

Voluntary Company Suspension of Utility Terminations: Even when not required by the state commission, a number of utilities are suspending terminations, including but not limited to: Ameren, American Electric Power, Dominion Energy, Duke Energy, Evergy, FirstEnergy, Georgia Power, NV Energy, PECO, PG&E, Southern California Edison, and Xcel Energy. The trade association for many utility companies, Edison Electric Institute, announced that its members are suspending electricity disconnections for nonpayment nationwide. A list of EEI members is [available here](#) [116] and a map of their service territories is [available here](#) [117].

More About Utility Suspensions: Some of the above mandated and voluntary suspensions of service also apply to suspension of late fees, but others do not. Some utilities are voluntarily reconnecting disconnected customers and Wisconsin, for one, is requiring reconnection for previously disconnected customers as long as utility companies can do so in a safe manner. Some of the mandated suspensions of disconnections are short-lived, such as only through the end of March, while others are open-ended. Some state moratoriums also apply to telecommunication services and some states have issued moratoriums specifically preventing termination of telecommunication or cable services. *See, e.g.*, District of Columbia, Kansas, and Maryland.

Arrearage Management: Eversource (a large Massachusetts utility) has agreed to change their arrearage management rules to help customers unable to make their monthly arrearage management plan (AMP) payments. Eversource will not remove a customer from the AMP, even if the customer misses payments during the emergency. At the end of the emergency, Eversource will work out a new monthly payment amount and schedule so the customer can continue to receive AMP benefits (monthly write-downs of the arrearage). For more details, email charak@nclc.org.

Door-to-Door Sales by Competitive Suppliers:

- Illinois Commerce Commission issued [two emergency orders](#) [118] banning in-person marketing and sales of electric and gas energy supply, including door-to-door marketing.
- [Massachusetts Department of Public Utilities has issued a March 24 letter](#) [119] requesting that all Competitive Suppliers and Licensed Competitive Supply Brokers cease door-to-door marketing activities until the Department rescinds this request or the state of emergency in the Commonwealth of Massachusetts is lifted, whichever comes first.
- [Pennsylvania Public Utility Commission’s Moratorium](#) [120] re: Supplier Door-to-Door and In-Person Marketing Proclamation of Disaster Emergency-COVID-19, limits in-person sale of competitive electric service. Other emergency proclamations may limit person-to-person sales contacts as well.
- Other emergency business closure proclamations may limit competitive suppliers’ person-to-person sales contacts as well.

State Limits on Collection Lawsuits, Post-Judgment Remedies, Debt Collection, Repossessions (Private Creditors)

[A state-by-state summary of protections from judgment creditors](#) [121], including exemptions for each of the fifty states

for wages, bank accounts, homesteads, motor vehicles, other personal property, benefits, retirement plans, insurance, extraterritoriality, and opt-out from bankruptcy exemptions. This appendix from NCLC's [Collection Actions](#) [121] is free to the public only for a limited time during the current emergency.

Alaska: [Senate Bill 241](#) [27] includes a moratorium on repossessions (sec. 26).

Arizona: [Attorney General Request](#) [122] (March 19, 2020): Urges “all financial and lending institutions who serve Arizonians to cease repossessions for at least ninety days.

District of Columbia: [D.C. Act 23-286](#) [35] Section 207 (April 13, 2020) during the emergency and for sixty days thereafter, no creditor or collector shall initiate or threaten a collection lawsuit; initiate, threaten, or act upon a garnishment, seizure, attachment, or repossession; visit, threaten to visit, or confront the consumer in person. No debt collector during that period shall communicate with the consumer. Certain exceptions apply.

Fulton County, **Georgia**, [Magistrate Court has suspended personal property foreclosures](#) [123] from March 14 to April 14, 2020.

Macon-Bibb County, **Georgia**, Civil and Magistrate Courts will not serve new garnishment orders. See <https://www.maconbibb.us/covid19/> [124] guidance listed under the “Slowing the Spread of COVID-19” list in the drop-down entitled Sheriff’s Office of Civil & Magistrate Court.

Illinois: [Governor’s Executive Order 2020-16](#) [125] (March 26, 2020) prohibits self-help repossessions from March 27, 2020 through the end of the declared emergency.

Illinois: [Governor’s Executive Order 2020-25](#) [126] (April 14, 2020) suspends during the emergency order service or garnishment orders or debtor examinations.

Iowa: Executive Department, [Proclamation of Disaster Emergency](#) [49] (April 24, 2020) suspends garnishments and replevin actions.

Maryland: [Governor’s Executive Order 20-04-03-01](#) [59] (April 3, 2020) orders a moratorium on repossessions.

Massachusetts: The Massachusetts Attorney General on March 27, 2020 issued [emergency regulation 940 C.M.R. 35.00](#) [127] regarding debt collection. One provision applies to creditors and debt collectors and the other provision only to debt collectors’ telephone calls. Both provisions apply for 90 days or when the state of emergency expires, whichever comes first.

The provision applicable to creditors and collectors provides that it is unfair or deceptive for any creditor or debt collector to threaten or act upon: a new collection lawsuit; garnishment, seizure, or attachment of the debtor’s wages or property; a motor vehicle repossession; a capias warrant; a visit to the consumer’s household or place of employment; or communicate in person with the consumer. Exceptions are made for mortgage loans, rent, and utilities.

The provision applicable to debt collector phone calls declares it unfair and deceptive for a debt collector to initiate a telephone communication, either live or recorded, to the debtor’s residence, cellular telephone, or other telephone number provided by the debtor. Exceptions are made for communications initiated by the debtor, for informing the debtor of a rescheduled court hearing, or for debts involving mortgage loans or rent payments.

[Click here](#) [128] to see the complaint in Massachusetts federal court brought by a debt collection trade association seeking to enjoin the emergency regulation.

Minnesota: [Governor’s Emergency Executive Order 20-50](#) [129] (May 4, 2020) suspends issuance and service of garnishment orders and also debtor examinations.

Nevada: [Governor’s Directive 017](#) [130] suspends the issuance and service of garnishment orders. (April 30, 2020).

Las Vegas, **Nevada**, [Justice Court, effective March 17 has ordered](#) [131] a stay of existing writs and requires any seized property frozen as of the date of the order to be released back to the debtor.

New York, [Brooklyn](#) [132] has adjourned all non-essential court dates (including payment dates) for either 60 or 90 days; no warrants or civil judgments will be issued for unpaid court debt in the meantime. District Attorney Eric Gonzalez also

announced he won't prosecute low level crimes.

Pennsylvania: [PA Care Package](#) [133] (March 30, 2020): Optional partnership between the Pennsylvania Attorney General and financial institutions in the state, recommending a vehicle repossession moratorium for sixty days.

Philadelphia, **Pennsylvania** [Common Pleas and Municipal Courts President Judge Administrative Order No. 17 of 2020](#) [134] (April 22, 2020) stays new garnishment orders and service of existing orders, and provides that consumers have a right to an emergency hearing on any frozen bank accounts.

Puerto Rico: [R.C. del S. 489](#) [83] (March 24, 2020) requires forbearance on car, personal and other consumer loans if consumer requests.

Texas: [Supreme Court Tenth Emergency Order Regarding the Covid-19 State of Disaster](#) [135] (April 9, 2020) suspends all service of a writ of garnishment until after May 7, 2020, which date may be extended.

Virginia: Virginia Supreme Court [Third Order Extending Declaration of Judicial Emergency in Response to Covid-19 Emergency](#) [136] (April 22, 2020) and [Processing Garnishments During the Pendency of Judicial Emergency](#) [137] (April 23, 2020) suspend new garnishment orders and provides for remote hearings on consumer's claim of exemption for prior garnishment orders.

Auto lender voluntary actions: See this [list of voluntary actions by auto lenders](#) [138].

The impact of court closures on judicial foreclosures, collection actions, and the like. Closure of courts to in-person hearings and limits on telephone/video hearings to essential matters may place a hold on judicial foreclosures, manufactured home replevin actions, collection lawsuits, and requests for post-judgment remedies. However, depending on their specific terms, these court closure orders and stays may not automatically stop the running of certain important deadlines, such as post-foreclosure redemption periods.

Is a debt collector a non-essential business? A list of state orders for the closure of non-essential businesses [is found here](#) [139]. When a state closes non-essential businesses, does this relate to debt collectors? This may depend on the specific wording of a governor's order. Nevada explicitly defines collectors as a non-essential business, but West Virginia's order provides that they are an essential business. While Illinois and Minnesota do not treat debt collectors as essential businesses, and state law prohibits debt collectors from calling debtors from the collectors' homes, the states have issued interpretations allowing collectors to do so. See [this industry report](#) [140].

Another issue is that debt collectors may be calling from out-of-state, and thus whether they should be closed may depend on a closure order in their state of residence and not the state where the consumer resides. On the other hand, a state's closure order may apply to out-of-state debt collectors who are licensed in the state that issued the closure order.

Another question is whether debt collectors can communicate from their homes even if they cannot communicate from the debt collector's usual place of business. Existing state law may limit locations from which collectors can initiate communications. Washington State is a good example. Washington State's shelter in place order that went into effect March 26 requires non-essential businesses to close in person operations. Since debt collectors in Washington are only licensed to work at their designated collection offices, this should stop Washington State debt collectors from communicating with consumers.

Minnesota debt collectors were in the same position, but the Commissioner of Commerce issued a [guidance](#) [141] effectively allowing collectors to call debtors from home under certain conditions.

A debt collection industry trade association, ACA International, has a list providing for a number of states [links to and summaries of business closure orders](#) [142].

What about repossessions? Unclear is whether a vehicle repossession is in violation of a cease business order, and also whether the seizure in these conditions should be considered a breach of the peace, particularly if the repossession occurs while the debtor or others are present.

Price Gouging

Alaska: [Senate Bill 241](#) [27] includes a provision prohibiting as an unfair and deceptive practice price increases over 10% for

specified categories of products, unless responding to an increase in costs related to the product (sec. 26).

Maryland on March 19 signed into law [House Bill 1663](#) [143] that during the state of emergency prohibits retailers from unfair price gouging for essential goods like food, fuel, medicine, medical supplies, and cleaning products, and affirms that such action is subject to the enforcement by the attorney general.

Massachusetts Attorney General just issued an emergency regulation [144], amending 940 Code Mass. Regs. 3.18 to expand the prohibition against price gouging from covered petroleum products to now include “any goods or services necessary for the health, safety, or welfare of the public.”

Wisconsin, the [Department of Financial Institutions has announced](#) [145] that payday and licensed lenders risk license suspension or revocation for increasing interest rates, fees, or costs of borrowing in response to COVID-19.

To see other state restrictions on price gouging in an emergency, see [NCLC’s Unfair and Deceptive Acts and Practices §§ 4.3.11](#) [146] and [8.5.1.5](#) [147].

Collection of Civil and Criminal Debt Owed to the State

A *state-by-state tracker for COVID-19 fines and fees suspensions* is found at the [Fines & Fees Justice Center](#) [148], by scrolling down past their policy recommendations.

California: California Judicial Council issued [California Rules of the Court Emergency Rules \(April 6, 2020\) to eliminate bail requirement all criminal cases with enumerated exceptions](#). [28]

California: State Controller Betty Yee on March 27, 2020, suspended the Franchise Tax Board’s (FTB) collection on debt imposed by state and local governments, including the juvenile and criminal legal systems and superior courts (traffic violations, infractions). This policy will go into effect immediately.

Chicago, Illinois: The [mayor has suspended](#) [149] payment plan defaults, late penalties, referrals to collection firms for city debts from March 18 to April 30, 2020.

Iowa [Governor’s Proclamation of Disaster Emergency](#) [49] (April 24, 2020): Suspends tax sales.

Kentucky: [The governor has suspended](#) [150] state-enforced collection methods, including releasing bank and wage levies, license and vehicle registration revocations, and providing a 3-month hold on payments for taxpayers and individuals if they call and report they cannot make installment payments due to COVID-19.

Louisiana: [12th Judicial District Court has suspended](#) [151] the requirement to make scheduled payments of fines, fees and court costs until further notice.

Maine [courts have vacated](#) [152] all outstanding warrants for unpaid court fines and fees and for failure to appear for hearings.

Massachusetts has suspended collection of debt owed to the state at least until April 7, 2020.

Minnesota [judiciary](#) [153] will stop sending out late penalty notices and assessing the late penalties for all citations; halt the automated process by which a person’s license is suspended for failure to appear; and stop referring past-due payment cases to the Department of Revenue for collections.

New York’s [attorney general on March 16 ordered](#) [154] state debt collection suspended for at least 30 days, state student and medical debt is automatically suspended, consumers with other state debts can apply for relief at [155].

New York: Some parts of the state have temporarily stopped processing new driver’s license suspensions and associated fees for failure to pay traffic tickets or for failure to appear at a traffic court hearing.

New York, Buffalo is [suspending late fees](#) [156] and interest on [parking, traffic](#) [157] and other city accounts (e.g., utilities).

North Carolina, the Attorney General announced [158] on March 26 he is suspending collection of debt owed to state

agencies.

Osage County, *Oklahoma* on March 16 [placed a hold](#) [159] on most outstanding warrants.

Oregon, Judicial Department has [issued an order](#) [160] suspending the collection of court fees, fines, and costs, including imposing late fees, suspending driver licenses for nonpayment, imposing collection fees, referring new cases to collection, garnishing court debt. The courts also have expanded authority to waive fees and are strongly encouraged to waive, reduce, or suspend court debt payments for debtors with limited financial resources.

Reading *Pennsylvania* announced [several fines and fees reforms](#) [161].

- Suspend new late penalties on citations.
- Extend deadlines for submitting citation protests.
- Grace period of fine payment from March 18-31, 2020.
- No barnacles or boots will be placed on cars from March 18-31, 2020.
- Discontinued the issuance of new parking tickets.
- Suspension of parking meter enforcement.
- RPA will allow residents to park their cars free of charge 24/7 for next 2 weeks.

Banking and Bank-Extended Consumer Credit

The federal regulators that oversee federal banks are encouraging banks to work with their customers to help them meet their financial needs, including waiving certain fees, increasing credit limits for some borrowers, and offering payment accommodations including modifying terms on current loans due to temporary financial hardship due to COVID-19. For more information, see materials by the [Office of the Comptroller](#) [162] and the [Federal Deposit Insurance Corporation](#) [163].

California: The Commissioner of Business Oversight issued [guidance to California Financial Institutions](#) [164] on March 22, 2020, encouraging them during the state of emergency: to waive ATM fees, overdraft fees, and credit card late payment fees and also early withdrawal penalties on time deposits. They are also encouraged to increase ATM daily cash withdrawal limits; ease restrictions on cashing out-of-state and non-customer checks; increase credit card limits for creditworthy borrowers; and offer payment accommodations.

Illinois Department of Financial and Professional Regulation in a [March 30, 2020 release](#) [165] “strongly urges banks and credit unions to respond to borrowers affected by the current economic environment” to offer payment accommodations, provide new loans on favorable terms, waiving fees, increasing ATM withdrawal limits, easing check-cashing, and increasing credit card limits.

New Jersey Department of Banking and Insurance announced [72] on March 28, 2020, that Citigroup, JP Morgan Chase, US Bank, Wells Fargo, Bank of America, and over forty other federal and state-chartered banks, credit unions have committed to waiving certain bank fees including early CD withdrawals.

[New York Governor’s Executive Order No. 202.9](#) [78] charges the New York State Department of Financial Services to ensure that licensed or regulated entities grant consumers in the State of New York forbearance of loan payments for 90 days for any person or entity facing a financial hardship due to COVID-19. [NYSDFS emergency regulations](#) [77] will modify or restrict ATM, overdraft and credit card late fees charged by licensed or regulated entities.

Note: Many banks agree to waive various fees for customers upon request. The best course is to contact a consumer’s bank and request waiver of fees because of a COVID-19 related hardship. The bank is not required to do so, but many banks will.

[A bank-by-bank listing](#) [166] of virtually all banks and the actions each bank is voluntarily taking.

Bankruptcy Changes

[CARES Act § 1113\(b\)](#) [167] excludes stimulus checks and other payments from being considered as income for purposes of the chapter 7 means test and for determining in chapter 13 cases the amount to pay unsecured creditors. These payments are excluded from “currently monthly income” under Bankruptcy Code § 101(10A) and “disposable income” under § 1325(b)(2). This permits debtors in bankruptcy cases to keep stimulus payments and not have them used to pay creditors or deny

bankruptcy relief. This provision applies to any case filed before or after enactment of the CARES Act.

However, the CARES Act does not create an exemption for these payments. Because stimulus payments are refundable tax credits, they may be property of the debtor's bankruptcy estate depending in part on the timing of when they are received, not unlike the receipt of tax refunds and EITC payments. To the extent stimulus payments are estate property, attorneys should attempt to claim them as exempt under available federal or state exemptions, such as wildcard exemptions.

[CARES Act § 1113\(b\)](#) [167] also prevents current chapter 13 cases from failing by permitting debtors to extend the term of their plans in order to have additional time to pay critical debts. Many debtors will lose income and not be able to stay current with plan payments. While courts will likely suspend payments during the crisis in any event, existing law would not have permitted debtors to extend their plans beyond a term of five years. If plans could not be extended, many debtors would not be able to cure mortgage defaults, pay car loans and other secured debt, or pay priority claims such as tax obligations and child support. [CARES Act § 1113\(b\)](#) [167] permits a debtor who has experienced a material financial hardship due, directly or indirectly, to the COVID-19 pandemic to seek a modification of the plan that will extend the period of time for payments on claims for up to seven years after the date the first payment was due after plan confirmation. This provision applies to any chapter 13 case in which the plan was confirmed before enactment of the CARES Act.

The provisions described above will sunset one year after enactment.

[U.S. Trustee Program Notice to Chapter 7 and 13 Trustees Regarding Recovery Rebates Paid to Consumer Bankruptcy Debtors](#) [168] (April 7, 2020) affirming that stimulus payments should not be included in the calculation of current monthly income or projected disposable income, and in a chapter 7 filed on or after March 27, 2020, the U.S. Trustee expects that it is highly unlikely that the trustee would administer the payment. For chapter 13 cases filed before March 27, 2020, the recovery rebate is excluded from that analysis because it would not have been available for payment to creditors in a chapter 7 case.

[U.S. Trustee Program Notice on Continuance of Section 341 Meetings](#) [169] (March 16, 2020): "Effective immediately, all in-person chapter 7, 12, and 13 section 341 meetings scheduled through April 10, 2020, are hereby continued until a later date to be determined. Absent special circumstances, section 341 meetings may not proceed during this period except through telephonic or other alternative means not requiring personal appearance by debtors. Appropriate notice will be provided to parties in accordance with bankruptcy law and rules. Meetings already noticed as telephonic meetings may proceed as scheduled."

[U.S. Trustees Office re Audits](#) [170]: Effective immediately, the USTP is suspending its designation of new individual chapter 7 and chapter 13 cases subject to audit for an indefinite period.

Fair Credit Reporting

[CARES Act § 4021](#) [171] provides less than minimal protections regarding credit reporting. From January 31, 2020 until 120 days after the end of the national state of emergency, if a creditor has made an accommodation (such as a forbearance or workout) for a consumer pursuant to the state of emergency, the creditor shall report that account with the same status as prior to the accommodation to a consumer reporting agency. That is, if an account was current it shall continue to be reported as current, while a delinquent account shall continue be reported as delinquent. The exceptions are (1) the provision does not apply to charged-off accounts and (2) if the account was delinquent and the consumer manages to bring the account current during the period of accommodation, the account shall be reported as current.

[Free credit reports](#) [172]: The major 3 credit reporting agencies, Equifax, TransUnion, and Experian, are offering free weekly credit reports through April 2021.

Stopping Automatic Payments from Bank Account

When cash is tight, payments that are automatically deducted from a consumer's bank account may not be the most important bills to pay. Instead the consumer may want to stop those payments and save the money for critical needs. This [information from the Consumer Financial Protection Bureau](#) [173] including sample letters which may prove helpful in stopping automatic payments.

Insurance Premiums

New Jersey: [Governor's Executive Order 123](#) [174] (April 9, 2020) suspends cancellation of all forms of insurance coverage for non-payment at least for ninety days (sixty days for health and dental insurance).

Health Insurance Coverage

[The Commonwealth Fund](#) [175] is keeping track of state actions related to private insurers' coverage of COVID-19 critical services.

CARES Act Employee Protections

The National Employment Law Project has a [helpful fact sheet](#) [176] on CARES Act provisions providing protections to employees.

Advice and Assistance for Consumers

NCLC's [Surviving Debt](#) is a 288-page book on advice to families in financial difficulties covering most forms of consumer debt. A [digital version is FREE](#) [2] during the COVID-19 emergency.

[www.consumer.law](#) [177] is an excellent consumer-facing website providing advice to consumers in the current emergency for most major forms of consumer debt.

NCLC's ["How to Get Legal Assistance"](#) [178] provides links to resources to find legal aid offices, HUD approved housing counselors, consumer bankruptcy attorneys, pro bono attorneys, state utility commission consumer offices, and free legal assistance for U.S. military service members.

[Law Help](#) [179] provides sources of assistance for consumers in each state.

[NACA](#) [180] lists private consumer attorneys by practice area in each state.

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Since 1969, the nonprofit National Consumer Law Center® (NCLC®) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, including older adults, in the U.S.

NCLC's expertise includes policy analysis and advocacy; consumer law and energy publications; litigation; expert witness services, and training and advice for advocates. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state government and courts across the nation to stop exploitative practices, help financially stressed families build and retain wealth, and advance economic fairness.



Source: National Consumer Law Center, [], updated at www.nclc.org/library

Source URL: <https://library.nclc.org/major-consumer-protections-announced-response-covid-19>

Links

- [1] <https://www.nclc.org/special-projects/covid-19-consumer-protections.html>
- [2] <https://library.nclc.org/sd/0102>
- [3] <https://mailchi.mp/929cf72e7394/covid-19-resources-for-the-financial-fallout-from-nclc-publications>
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