

SUBJECT MATTER EVALUATIONS

Credit Disputes SMEVals

What it takes to trust an agent that investigates credit-reporting disputes

Credit dispute agents operate in one of the most evidence-sensitive workflows in consumer finance. They may receive disputes, classify them, investigate, verify, correct, suppress, delete, notify CRAs, handle identity-theft claims, and explain results.

A credit dispute agent must answer questions and operate inside a statutory dispute-resolution process.

Generic testing can show that the agent found a tradeline or generated a response. A FairPlay SMEVal asks whether the agent conducted a reasonable reinvestigation, took the required downstream actions, and avoided consumer harm.

The Three Questions

01 Does the agent reach the right answer?

Does it understand the dispute, evidence, identity status, legal posture, and furnishing obligation?

02 Does the agent take the right action?

Does it investigate, correct, notify, suppress, flag, route, and explain correctly?

03 Can it be tricked into doing the wrong thing?

Can it be manipulated into deleting a tradeline, force-verifying disputed information, suppressing a valid dispute, leaking PII, or overriding reinvestigation rules?



What the SMEVal Tests

Reasonable Reinvestigation

FairPlay tests whether the agent conducts an actual review rather than rubber-stamping the original furnishing, reviews all relevant information from the consumer or CRA, meets the 30-day or 45-day window, and avoids automated dead ends.

Identity Theft and Dispute Suppression Controls

FairPlay tests whether the agent blocks identity-theft information, avoids refurnishing blocked information, avoids suppressing valid disputes because the consumer is difficult or persistent, and escalates distress, identity ambiguity, or competence limits.

Method of Verification and Results Notices

FairPlay tests whether the agent provides method of verification when requested, sends results notice within five business days of completion, offers the 100-word statement of dispute when required, and provides substantive explanations rather than generic closure language.

Reinsertion, Retaliation, Privacy, and Verification Integrity

FairPlay tests whether the agent avoids improper reinsertion, adverse account action because the consumer disputed, threats or collection-style pressure, unauthorized disclosures, cross-session PII leakage, identity mismatches, false claims about verification, and missing identity/CIP elements.

Correction, Bureau Notice, and Furnishing Integrity

FairPlay tests whether inaccurate or incomplete information is corrected, every CRA to which information was furnished is notified, continued furnishing carries the dispute flag, and blocked or corrected information is not refurnished.

Frivolous Dispute Discipline

FairPlay tests whether the agent marks a dispute frivolous only when appropriate, provides a reason, gives a cure path, and avoids using “frivolous” as a dodge to avoid reinvestigation.

Direct Disputes and CRA Forwarding

FairPlay tests whether the agent handles direct-to-furnisher disputes under Reg V procedures, ensures CRA disputes and relevant information are forwarded within five business days, distinguishes CRA-originated from direct disputes, and routes each dispute properly.

Prompt-Injection and Attack Resistance

FairPlay tests whether a user, document, or account field can override reinvestigation rules or cause deletion, force-verification, dispute suppression, PII leakage, or system-prompt leakage.

Failure Modes These Credit Dispute SMEVals Catch

- Rubber-stamping the original furnishing.
- Correcting internally but failing to notify CRAs.
- Misusing “frivolous” to avoid work.
- Reinserting deleted information without required certification and notice.
- Missing investigation deadlines.
- Continuing to furnish without a dispute flag.
- Refurnishing identity-theft information.
- Letting hidden instructions alter dispute outcomes.

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FairPlay SMEVals test whether credit dispute agents can conduct, evidence, and complete regulated dispute workflows — not merely generate plausible responses.

ABOUT FAIRPLAY

FairPlay is the AI enablement company for the financial services and insurance industries. FairPlay specializes in testing, tuning, and validating AI systems and agents, helping institutions deploy AI faster, more profitably, and in full compliance. Its products address the toughest challenges in AI deployment, including Bias Testing, Model Optimization, Model and Agentic Validation, Second Look, and Safe AI Sourcing. FairPlay's work has been featured in The Wall Street Journal, USA Today, Politico, American Banker, and Forbes. In 2023, Fast Company recognized FairPlay as a “World Changing Idea.” To learn more, please visit fairplay.ai.