

Building Consumer Reporting Integrity at Block

A First-Year Implementation Blueprint

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Perspective

The framework below reflects how I would approach the first six months while learning Block's current environment. It is based on the position description, publicly available regulatory requirements, and the risk-management and control principles I have applied throughout my career. It is intentionally designed as an operating blueprint rather than an assessment of Block's existing processes, systems, or controls. I would refine my approach following a current-state assessment in partnership with FCRA subject-matter experts, Legal, Risk/Compliance, Product, Engineering, Data, Modeling, and Operations, building on existing capabilities and controls as the program evolves toward its future-state objectives.

One of the first capabilities I would want to understand is whether Block can trace a disputed item backward to the event that created it and forward to every report or score that consumed it. If that capability is not yet reliable, I would view strengthening it as an important foundational priority before trying to optimize the dispute workflow. Disputes can serve as a feedback loop for broader data, product, reporting, and control weaknesses.

I. Approach

I would build Block's consumer reporting and furnisher disputes program as an end-to-end consumer data integrity and risk management capability, rather than a downstream dispute-processing function. My understanding of the role is that an important objective will be helping establish the control architecture needed to support a reliable consumer reporting ecosystem.

My approach draws on my experience in building enterprise risk, reporting, and control frameworks in a complex, highly regulated financial institution. That experience includes partnering across Risk, Product, Technology, Operations, Legal, and Compliance; translating regulatory requirements into practical solutions; developing reporting, monitoring, and management information; establishing data architecture, data-quality rules, and User Acceptance Testing; and driving sustainable remediation across the organization. I would apply those capabilities to the consumer-reporting environment while partnering closely with the subject matter experts on requirements specific to Block's CRA and furnisher activities.

I would want the program's capabilities to connect directly to the consumer outcome. A dispute should not end when an investigator responds, it should tell us something about the quality and controls. The program would ideally enable Block to determine what was reported, why, whether it was accurate, which data produced it, how errors should be corrected, whether corrections transmitted downstream, and whether other consumers may have been affected and require additional remediation or notification.

Given the role's focus on establishing a CRA capability, the first 180 days would be used to establish the governance, data, investigative, correction, monitoring, and evidence infrastructure needed to operate reliably, while assessing Block's existing capabilities and risks. Capabilities would then be prioritized based on consumer risk, regulatory requirements, launch dependencies, and scalability.

The program would be built around five principles:

1. **Accuracy and integrity** — Reporting accuracy begins with the originating data and correct product architecture.
2. **Reasonable investigation** — Investigations should be appropriately scoped, evidence-based, well-documented, and consistently executed.
3. **End-to-end traceability** — Material reported attributes should be traceable to authoritative source data.
4. **Correction at the golden source** — Remediation should address underlying data and systemic causes.
5. **Continuous oversight** — Monitoring, testing, issue management, and periodic review should continuously strengthen the program.

I would aim to help establish a consumer-centered, technically credible, operationally scalable, measurable, and examination-ready program.

I would want success to be measured not simply by whether disputes were closed on time, but by whether Block can demonstrate that it investigated allegations appropriately, reached supported conclusions, corrected inaccurate information, learned from issues, and used those insights to strengthen the consumer reporting ecosystem.

II. Potential Target Operating Models

I would look at a consumer dispute as a potential symptom, not necessarily the underlying problem. The objective should not be limited to determining whether the record is correct. Each dispute should also provide an opportunity to evaluate the integrity of the underlying data and control environment, identify potential systemic issues, assess whether other consumers may be affected, and drive sustainable remediation.

Questions I would want the program to be able to answer include:

- Where did the information originate, and what is the authoritative source?
- What controls, if any, allowed it to become inaccurate, incomplete, or inconsistent?
- How did the information flow through Block's data, reporting, and scoring ecosystem?
- What information was furnished or reported, and how was it used?
- What evidence supports the accuracy of the information and the investigation?
- How many other consumers could be affected by the same issue?
- Can we correct the source rather than repeatedly correct individual records?
- How would we know the correction reached every relevant downstream system, CRA, report, and score?
- Did the correction change any consumer report or score, and was that change appropriately reflected?
- What preventive control should change so the issue does not recur?

Customer Dispute Flow

Proposed Cash App model

- Consumer dispute
 - Intake & triage
 - Investigation
 - Source-data validation
 - Remediation/ Resolution
 - Data correction
 - Downstream propagation
 - CRA/report/score validation
 - Consumer notification
 - Root-cause analysis
 - Preventive control
 - Monitoring
 - Reporting

Control Framework

Preventive

- Data-quality controls
- Product/change controls
- Source validation
- Data lineage

Detection

- Reconciliation
- Exception monitoring
- QA/sampling
- Dispute trend analysis

Correction

- Data correction
- Downstream validation
- Root-cause remediation
- Population-impact assessment

Governance

- Issue management
- Escalation
- Periodic review
- Training
- Management reporting

Control Flow Data/Control

Source

- Source System
- Golden Source
- Data Integrity Controls
- Reporting
- Customer Report/ Score
- Dispute
- Investigation
- Correction
- Downstream Validation
- Monitoring
- Reporting

Cross-Functional Partners: Clarify Owners, Primary Partners and Scope

Capability	Teams
Investigation standard	Risk/Compliance, Legal, Ops
Case workflow	Product, Engineering, Ops
Source-data correction	Data, Engineering, Product
Reporting controls	Data, Engineering, CRA
Consumer notification	Operations/Product, Legal
Root-cause analysis	Data, Engineering, Product
Monitoring/testing	Risk/Compliance, Data, Ops, QA
Regulatory engagement	Legal, Compliance
Product change review	Product, Engineering, Legal
Data use, access, governance	Privacy/ Data

III. Implementation Plan: First 180 Days

I would structure the first 180 days around six phases, with each phase producing defined deliverables, documented decisions, accountable owners, and contingency considerations. The sequencing would remain flexible based on the current-state assessment, regulatory priorities, launch dependencies, and the capabilities already in place.

Period	Objective	Deliverables
0–30	Understand	Regulatory obligations and dependencies, governance, data/system map, risk assessment, CRA/furnisher responsibility map
31–60	Define/Design	Investigation standard, policies, control framework, operating model, regulatory map
61–90	Build	Dispute workflow, correction taxonomy, data-lineage requirements
91–120	Integrate	Engineering remediation, monitoring, product-development controls
121–150	Validate	QA, sampling, testing, training, control validation
151–180	Operationalize	MI/KRIs, issue management, examination readiness

IV. Investigation Standard

A foundational deliverable would be to establish an Investigation Standard for Block that translates applicable FCRA and Regulation V requirements into clear, consistent, risk-based operational expectations for conducting a reasonable investigation. The standard would define investigative depth, evidence, documentation, decisioning, and remediation, while ensuring identified inaccuracies are traced to their root cause and corrected across downstream systems and consumer reports. The depth of investigation should be proportionate to the complexity and potential consumer impact of the dispute, producing consistent and defensible outcomes.

The Standard would be designed to define:

- Required investigation steps by dispute type
- Information and evidence that must be considered
- How consumer-provided information is evaluated
- Identification of authoritative source data
- When investigation must extend beyond the immediate account record
- Escalation criteria
- Documentation and evidence requirements
- Resolution standards
- Correction requirements
- Downstream validation requirements
- Potential population-impact assessment
- Root-cause analysis
- QA and testing expectations
- Management reporting

Investigation and Evidence Readiness

- What was reported
- What the consumer alleged
- What information was considered
- What investigative steps were taken
- What evidence supported the conclusion
- Who made the determination
- What correction occurred
- When it occurred
- Whether downstream systems were updated
- Whether similarly situated consumers were assessed
- Why the final response was reasonable

V. Measures of Success

I would measure the program's effectiveness through a balanced set of metrics across four dimensions: Consumer, Data, Operations, and Risk.

The objective would be not only to understand whether the program is processing disputes effectively, but also whether it is improving the accuracy and integrity of the underlying consumer reporting ecosystem.

I would use these metrics to create a management view that connects: Consumer Outcome, Data Integrity, Operational Performance, Risk Exposure, Remediation and Residual Risk.

Four Principles

Consumer

- Accuracy
- Timeliness
- Correction effectiveness
- Repeat disputes

Data

- Defect rates
- Reconciliation exceptions
- Downstream propagation failures
- Recurrence

Operations

- Investigation quality
- Aging
- QA results
- Escalations

Risk

- Systemic issues
- Consumer population affected
- Remediation aging
- Regulatory complaints/examination findings

The goal would be to ensure that management reporting does not simply measure how many disputes the program processed, but whether the program is improving consumer outcome, identifying weaknesses in the underlying data and control environment, and reducing the likelihood and impact of future reporting inaccuracies.

VI. Questions I Would Explore Before Finalizing the Design

CRA: Did we reasonably investigate whether the consumer report is accurate and complete, and did we correct the report when appropriate?

Furnisher: Did we reasonably investigate whether the information we furnished is accurate and complete, trace the dispute to the underlying source data when necessary, and correct both the source and downstream reporting when appropriate?

- What information will Cash App furnish directly versus through third parties?
- Which data elements feed the Cash App Credit Score?
- What are the authoritative sources for each reportable attribute?
- What is the current dispute intake and case-management architecture?
- How is data lineage currently documented?
- Which corrections can be automated versus manually remediated?
- How are downstream reports and scores recalculated after correction?
- What existing data-quality and control capabilities can the FCRA program leverage?
- What regulatory obligations attach to the CRA function versus Block's furnisher activities?
- Where are the existing control points in the product and data-development lifecycle?
- How are systemic data defects currently identified, escalated, and remediated?
- What evidence is currently available to demonstrate the accuracy and integrity of furnished information?