

, , 2023

Dear :

My name is , and I am with . In this letter I represent from the perspective of our accounts receivable team and as a client of , which is a member of ACA International, the Association of Credit and Collection Professionals (ACA).

I am writing to ask you to consider our facility's concerns regarding the Consumer Financial Protection Bureau's recent actions related to medical debt and credit reporting. These actions impact and our receivables operations—which directly affect our financial model and therefore the patients we are here to serve.

Unfortunately, in recent months the CFPB has advanced unfounded allegations against the accounts receivable management (ARM) industry, an industry comprised of highly-regulated professionals including third-party debt collection agencies we work with that serve the vital role of helping consumers resolve their outstanding medical debts. The bureau's stated objective is to completely remove any reference to outstanding medical debts from all credit reports. This goal, if achieved, will result in negative consequences for patients for many reasons, including potential resources challenges resulting from bills not being paid by consumers that have the ability to do so.

Additional Perspective from Providers:

From my perspective as an advocate who is personally concerned about the impact of the CFPB's actions on businesses, patients, consumers and health care providers, without getting input from those groups and current data, the bureau's goal appears to be to arrive at processes that put health care providers at risk of financial harm, which in turn harms patients.

I support ACA's [ask in September 2022](#) that Congress begin immediate work with the CFPB to ensure that it takes a step back from its current approach to implementing changes to medical debt credit reporting without stakeholder input.

ACA shared some additional information in the form of [FAQs](#) on some of the key issues on this topic. You can also reference the association's September 2022 [letter](#) to members of Congress with more information on the concerns I mention.

Notably, ACA member companies that work in medical debt collections are committed to providing valuable account management resources to many health care providers, including in rural and urban communities that would not be able to continue without their support.

As part of that commitment, ACA staff and members were part of the Healthcare Financial Management Association Medical Accounts Receivable Resolution Task Force, which included consumer groups, that reconvened in 2020 to update best practices for the fair resolution of patients' medical bills.

These best practices put even stronger guardrails around the credit reporting process. The [report from the HFMA and ACA is available here](#).

Thank you for addressing our concerns.

Sincerely,
