

ROADMAP: Help Strengthen the CFPB's Debt Collection Rule!

Comments Due September 18, 2019

The Consumer Financial Protection Bureau (CFPB) has proposed a new rule governing debt collectors. In many ways, the rule does more to protect abusive collectors than consumers. You can help push for a strong rule that protects consumers by submitting a comment by August 19 and spreading the word to encourage others to do so.

Tell the CFPB how debt collectors impact your community and what you think of the proposed rule. The comment does not need to be technical or long. Even a one-page letter highlighting the issues that are important to you will help push the CFPB towards a stronger final rule.

Below is a roadmap with some ideas on how to craft a comment with links to materials, instructions for submission, and a link to a grassroots comment card to distribute to your network.

STEP 1 Why do you care about debt collection?

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Describe your organization and how current debt collection practices affect people in the communities you care about. Frame this with state specific data available here: <http://bit.ly/StateDebtFactSheets>. If your organization has its own reports or state specific statistics, number of clients represented in debt collection matters for instance, even better.

Individual stories are key!

STEP 2

Once you have set the stage with background on your group, your work, and debt collection in your state, tell the story of the affects of debt collection in your community through individual stories. For example: How does it impact people when the phone rings every day from a debt collector? Are they being sued or threatened for debts they do not owe or old debts they do not remember? Are debt collection lawyers bringing lawsuits with faulty information? Is paper mail about legal notices important to your clients with limited electronic access?

Link individual stories and your work to the rule.

Now that you have drawn the reader in with a consumer story, relate that story to the need for a stronger rule. NCLC's Issue Brief on the rule <http://bit.ly/DebtRuleSummary> outlines several problems with rule including allowing collectors to:

STEP 3

1. *Ring you 7 times per week, per debt. Consumers with 8 medical debts could receive 56 calls a week!*
2. *Contact you by text, email or direct message without your permission, and sending legally required notice through hyperlinks in email or texts.*
3. *Sue you without their attorneys reviewing original account documents to make sure you are the right person and the debt is the right amount.*
4. *Collect debt that is so old that the deadline for a lawsuit has passed and records of who owes the debt and for how much may be lost.*

You may also want to support elements of the proposal that are positive, such as the limit of one conversation per week, but urge that it be strengthened to be one conversation per consumer, not per debt. **What will the proposed rule mean for your community?**

Submit your comment and ask your network to comment!

STEP 4

You must put **CFPB-2019-0022** in the subject line of any communication. You can submit your comment via: NCLC's comment portal: <http://bit.ly/DebtCommPortal>; the [Regulations.gov](http://www.regulations.gov) portal; email to **2019-NPRM-DebtCollection@cfpb.gov**, or mail to Comment Intake, Bureau of Consumer Financial Protection, 1700 G Street NW, Washington, DC 20552. Encourage individuals to use the grassroots comment card: <https://www.nclc.org/issues/comment-card.html> (which they can even email by taking a picture of it with their smartphone!). **Please forward this document to anyone you think may be interested in commenting!**

Questions? Contact Michael Best at mbest@nclc.org