



Submitted Via [Regulations.gov](https://www.regulations.gov)

February 9, 2023  
Consumer Financial Protection Bureau  
1700 G Street NW  
Washington, D.C. 20552

Re: Information Collection Titled “Application for the Bureau's Advisory Committees”  
(Docket No. CFPB-2023-0007).

Dear Director Chopra:

On behalf of the Association of Credit and Collection Professionals (“ACA International” or “Association”), I am writing in response to the information collection titled “Application for the Bureau's Advisory Committees.”

ACA International represents approximately 1,800 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, in an industry that employs more than 133,000 people worldwide. Most ACA International member debt collection companies are small businesses. The debt collection workforce is ethnically diverse, and 70% of employees are women.

## **I. Background about ACA International**

ACA International members play a critical role in protecting both consumers and lenders. ACA International members work with consumers to resolve their debts, which in turn saves every American household, on average, more than \$700 year after year. The accounts receivable management (“ARM”) industry is instrumental in keeping America’s credit-based economy functioning with access to credit at the lowest possible cost. For example, in 2018 the ARM industry returned over \$90 billion to creditors for goods and services they had already provided to their customers. In return, the ARM industry’s collections benefit all consumers by lowering the costs of goods and services—especially when rising prices are impacting consumers’ quality of life throughout the country.

ACA International members also follow comprehensive compliance policies their high ethical standards ensure consumers are treated fairly. The Association contributes to this end goal by providing timely industry-sponsored education as well as compliance certifications. In short, ACA International members are committed to assisting consumers as they work together to resolve their financial obligations, all in accord with the Collector's Pledge that all consumers are treated with dignity and respect.

The CFPB in its information collection notes that it invites individuals with special expertise to serve on the Bureau's advisory committees. It further notes that feedback collected will allow the Bureau to evaluate and improve its advisory committee program and that it will use the information collected for vetting candidates, issuing travel orders, or providing reimbursement for travel expenses (as applicable).

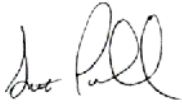
## **II. Comments of ACA International**

It is critical for the Bureau to have access to real-world examples from all stakeholders surrounding debt collection on how policymaking impacts their business operations and work with consumers and creditors. Since the Bureau's inception, ACA has served as a resource to the CFPB and has enjoyed collaborating on financial literacy projects as well as other direct outreach initiatives to improve consumer outcomes. Unfortunately, when information about debt collection relied upon during policymaking is one-sided, or embellished upon by certain groups, the resulting policies negatively impact the ARM industry as well as consumers and creditors. As such, it is critical that when issues surrounding the ARM industry arise, all stakeholders have the opportunity to contribute to the discussion.

Unfortunately, the CFPB has not included representatives from the ARM Industry on any of its advisory committees in recent years, even when issues related to the industry were key topics on the committees' agenda. ACA International recommends that the Bureau consider adding a nonbank advisory board precisely because the ARM industry oftentimes is not represented on the Consumer Advisory Board (CAB). For example, when Regulation F was one of the main topics on the CFPB rulemaking agenda, the Bureau's advisory committee did not consider input from the industry during its rulemaking discussions. The unique perspective and ability of the ARM industry to provide important feedback based on its compliance and financial services expertise should not be overlooked.

ACA International members are on the front lines communicating with consumers. As part of this work, they see trends in the financial services marketplace firsthand. Their perspectives and understanding of what is needed in terms of policy changes for the benefit of consumers, and a functioning economy, would serve the Bureau well.

Thank you for your attention to this matter. Please let me know if you have any questions.

A handwritten signature in black ink, appearing to read "Scott Purcell". The signature is fluid and cursive, with the first name "Scott" and last name "Purcell" clearly distinguishable.

Scott Purcell  
Chief Executive Officer  
On behalf of ACA International