



December 19, 2025

The Honorable Russell Vought
Acting Director
Consumer Financial Protection Bureau

Dear Acting Director Vought,

The undersigned 22 organizations are writing in response to the Consumer Financial Protection Bureau (CFPB) interpretive rule published October 28, 2025, stating that the Fair Credit Reporting Act (FCRA) preempts state laws on credit reporting.¹ We strongly oppose this guidance and the Administration's actions to undermine funding for the CFPB. This new guidance will stifle states' abilities to protect patients' through medical debt reforms, reforms that are incredibly important to our patients and on which many of our groups have worked at the state level.

Our organizations represent millions of patients and consumers who face serious, acute, and chronic health conditions. Together our organizations offer unique and important perspectives on what individuals and families need to prevent disease, cure illness, and manage their health. The diversity of our organizations and the populations we serve enables us to draw upon extensive knowledge and expertise that can be an invaluable resource to the Administration.

In March of 2017, our organizations came together to form the Partnership to Protect Coverage (PPC). Together, we agreed upon three overarching principles to guide any work to reform and improve the nation's healthcare system. These principles state that: (1) health care should be accessible, meaning that coverage should be easy to understand and not pose a barrier to care; (2) health care should be affordable, enabling patients to access the treatments they need to live healthy and productive lives; and (3) health care must be adequate, meaning healthcare coverage should cover treatments patients need. Preventing medical debt and mitigating its harm are crucial to ensuring patients can lead productive lives.

An estimated 100 million people in the United States are currently in debt due to medical and dental bills – the patients we represent are among them. Although the Affordable Care Act (ACA) gave consumers critical protection against catastrophic costs, including by capping out-of-pocket costs for most health

insurance plans. However, health care costs have continued to rise system-wide and many consumers and patients have been forced to take on medical debt to afford their care.

Unfortunately, the situation is likely to get much worse. Because of H.R. 1, recent federal regulatory changes, and Congress's failure to extend the enhanced premium tax credits, millions of Americans will be driven out of coverage or toward ACA non-compliant insurance products that leave enrollees exposed to high medical costs. This shift will leave more patients at risk of even higher levels of medical debt.

The consequences of this debt are overwhelming, particularly for patients with chronic and acute conditions. Too often, patients and their families must make difficult tradeoffs to manage their debt, including by juggling payments for basic household needs, such as utilities, rent or mortgage, and food, with those required to get care and manage their health conditions.ⁱⁱ Patients report feeling trapped by this debt and fear they may never be able to pay it off.ⁱⁱⁱ The CFPB has been an important resource to patients and consumers, taking modest but promising steps to curb the harms of medical debt and credit reporting practices that impact our communities.

Medical debt has documented, substantial effects on the financial futures of patients and their families. Beyond forcing individuals to ration basic needs, medical debt creates additional hardships when incorporated into consumer reports. The financial consequences of medical debt on credit reports can prevent patients and their families from securing employment and rental housing, as well as affordable loans for a home or a vehicle. Many patients indicate that medical debt, or fear of it, is a major financial consequence of their illness as well as a deterrent to seeking further medical care.^{iv}

What's more, evidence suggests that medical debt is not a strong predictor of a consumer's ability to pay and therefore their overall creditworthiness. In acknowledgement of this, VantageScore voluntarily removed medical debt from their scoring models in 2023.^v Unlike other forms of debt, patients who incur medical debt do not do so voluntarily. It is unavoidable for patients who need care and, therefore, does not reflect a patient's likelihood to pay back a loan or mortgage, satisfy rent for an apartment, or be a productive employee.

Many of our organizations have worked at the state level to pass legislation to protect patients from the harms of medical debt. As of July 2025, 14 states, from North Carolina to Vermont, have taken action to prevent medical debt from appearing on credit reports.^{vi} An additional five states have limited the reporting of medical debt to credit reporting agencies under certain conditions. The uptake of these reforms reflects a broad and bipartisan understanding of the harm and unreliability that medical debt on consumer reports presents. This is why members of our coalition were so supportive of the CFPB's previously proposed and finalized rule to prohibit the use of medical debt in credit determinations.^{vii}

The Consumer Financial Protection Bureau's recent guidance interpretation of FCRA is not legally binding, but we are deeply concerned with the Agency's statutory interpretation presented in the guidance. Regardless, the guidance's interpretation is already having a chilling effect on state action to protect patients from the consequences of medical debt. Further, undermining key funding mechanisms that underpin the core structure and function of the CFPB is harmful to our communities and to consumers across the country. We urge you to rescind this guidance and take immediate steps to restore funding to this critically important agency.

Once again, our organizations urge you to act swiftly to prevent additional harm to patients struggling with the exorbitant costs of life-saving medical care. Please contact Bethany Lilly

(bethany.lilly@BloodCancerUnited.org) if you have questions or would like to meet with members of the Partnership. Thank you for your consideration.

Sincerely,

AiArthritis
American Kidney Fund
American Lung Association
Blood Cancer United, formerly The Leukemia & Lymphoma Society
Cancer Nation
Cancer Support Community
Coalition for Hemophilia B
Cystic Fibrosis Foundation
Diabetes Patient Advocacy Coalition
Epilepsy Foundation of America
Hemophilia Federation of America
Hypertrophic Cardiomyopathy Association
Legal Action Center
Lutheran Services in America
Muscular Dystrophy Association
National Bleeding Disorders Foundation
National Kidney Foundation
National Multiple Sclerosis Society
National Patient Advocate Foundation
National Psoriasis Foundation
The AIDS Institute
ZERO Prostate Cancer

ⁱ 90 Fed Register 48710, October 28, 2025.

ⁱⁱ Semret Seyoum et al, "Cost Burden Among CF Population in the United States: A Focus on Debt, Food Insecurity, Housing and Health Services," Journal of Cystic Fibrosis, Vol. 22, Issue 3, May 2023, <https://www.sciencedirect.com/science/article/abs/pii/S1569199323000036>

ⁱⁱⁱ Results of a national poll of 2,663 US adults in August 2023, <https://bloodcancerunited.org/resources/newsroom/nearly-1-2-patients-medical-debt-feel-trapped-new-poll-leading>

^{iv} Lunna Lopes et al, Health Care Debt In The U.S.: The Broad Consequences Of Medical And Dental Bills (KFF, June 2022). <https://www.kff.org/health-costs/kff-health-care-debt-survey/#c7f7c77b-dec4-4baf-bed1-78e3522b4f46>

^v VantageScore, VantageScore Removes Medical Debt Collection Records From Latest Scoring Models (Aug 2022). <https://vantagescore.com/resources/knowledge-center/major-credit-score-news-vantagescore-removes-medical-debt-collection-records-from-latest-scoring-models>

^{vi} Maanasa Kona and Vrudhi Raimugia, State Protections Against Medical Debt: A Look at Policies Across the U.S. in 2025 (Commonwealth Fund, July 2025). <https://doi.org/10.26099/7m6v-ve80>

^{vii} Partnership to Protect Coverage, Letter RE: Prohibition on Creditors and Consumer Reporting Agencies Concerning Medical Information (Regulation V) (Aug 2024). <https://www.protectcoverage.org/siteFiles/47784/08%2012%2024%20PPC%20Medical%20Debt%20comments%20FINAL.pdf>.