2021 Tax Season

HIGHER COSTS FOR VULNERABLE TAXPAYERS DURING THE COVID ECONOMIC CRISIS

By Michael Best, Chi Chi Wu, and Lauren Saunders

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Fighting Together for Economic Justice

ABOUT THE NATIONAL CONSUMER LAW CENTER

Since 1969, the nonprofit National Consumer Law Center® (NCLC®) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, in the United States. NCLC's expertise includes policy analysis and advocacy; consumer law and energy publications; litigation; expert witness services; and training and advice for advocates. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state governments and courts across the nation to stop exploitive practices, help financially stressed families build and retain wealth, and advance economic fairness.

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EXECUTIVE SUMMARY

This National Consumer Law Center (NCLC) annual advisory on tax-time consumer protection issues includes:

- **Stimulus payments and the COVID crisis**. This year brings even greater confusion and complexity to tax filing than usual because of the economic fallout from COVID-19:
    - Tax season was delayed for several weeks because of changes to the tax law from the December 2020 stimulus package. Taxpayers should know that their Economic Impact Payments (EIP), i.e., stimulus payments claimed through a tax return and offsets, such as the Earned Income Tax Credit and Child Tax Credit are not, right now, protected from garnishment by debt collectors. Congress can, and should, fix this but they must act soon.
    - Filing a 2020 tax return will be important for those who did not receive their EIP, including those who do not normally file tax returns because their income is so low and those whose payments bounced when sent to temporary bank accounts set up by paid preparers.
- **Tax-time financial products.** Lenders and tax return preparers again team up to sell refund-related products and services to taxpayers with a move towards larger "no-fee" refund anticipation loans (RALs) and one price for all RALs no matter the amount. The latter practice may result in larger loan costs for taxpayers who might have taken out a smaller amount at a lower cost in previous years.
- **Debiting taxpayer bank accounts for preparation fees**. This tax season, Santa Barbara TPG is offering to collect past due tax preparation fees from taxpayers who previously took out a refund anticipation check (RAC) when the anticipated tax refund wasn't received by the taxpayer. The company's tactics include debiting the bank accounts of taxpayers that don't respond to requests to pay.
- **Inability to comparison shop for in-person service.** There seems to be a movement towards greater transparency in pricing when using an online or virtual tax preparation service. For in-person services, there is a lack of transparency, although H&R Block continues to offer more pricing information about these services than some other preparers. If the tax chains can disclose prices for virtual services, they and other brick-and-mortar preparers can disclose prices upfront as well.
- **Private debt collection**. The IRS private debt collection program continues to deliver vulnerable taxpayers into the hands of private debt collectors and rewards collectors with legally dubious commissions.
- **Taxpayers who receive a 1099-C for a discharged debt may have options**. Taxpayers whose debts are discharged may receive a 1099-C, which reports taxable income. There are options to avoid the tax.

STIMULUS PAYMENTS AND IMPACT OF THE COVID-19 CRISIS

This year saw confusion and complexity due to the fallout of COVID-19. In addition to delaying the start of tax season until February 12, both the CARES Act and the December 2020 stimulus package included Economic Impact Payments (EIP), i.e., stimulus payments for tens of millions of taxpayers. Those payments were technically structured as advance payments of the 2020 tax refund, with tax return implications for those who did not get their payment.

The IRS was required to issue tens of millions of stimulus payment by direct deposit or mail, and inevitably there were some hiccups. Some consumers were confused when the IRS sent them a prepaid card by mail and may have thought they were a scam. NCLC has an issue brief The EIP Stimulus Payment Prepaid Card: not a Scam; How to Avoid Fees that addresses the prepaid card issue in depth, and recently released a set of FAQs that addresses, among other things, how the IRS is working to solve the problem with stimulus going to temporary bank accounts.

Some payments went to closed bank accounts or old addresses. A small percentage of stimulus payments, albeit affecting millions of consumers, were accidentally sent to the temporary bank accounts used for refund anticipation checks.

The IRS could only send EIPs to taxpayers they could identify – i.e., those who had filed a tax return in 2018 or 2019. People whose income was so low that they do not file tax returns had a November deadline last year to identify themselves as non-filers to get their payment in 2020. But despite outreach by the IRS and others, approximately 8 million people who are eligible for stimulus payments have not received them.

Other taxpayers received the base amount of their stimulus payment but not the extra amount for dependents.

Anyone who did not get some or all of their stimulus payment and who believes they are eligible should file a tax return for 2020, even if their income is so low that they are not required to file a return. It is not too late to claim the two stimulus payments ($1,200 and $600, plus additional amounts for dependents, phasing out with higher incomes). Simply file a tax return and claim the Recovery Rebate Credit.

Most consumers should request direct deposit of their refund – which can also help if there are future stimulus payments – with some caveats. The fastest way for taxpayers to get their refund and to get any future stimulus payments quickly is to request direct deposit. If a taxpayer does not have a bank account, Cities for Financial Empowerment's Bank On program has a list of safe, low-fee accounts that can be opened remotely. Requesting direct deposit of a regular tax refund will also give the IRS information that can be used for direct deposit of future stimulus payments, if any.

Taxpayers should know, however, that stimulus payments claimed through a tax return will not, right now, be protected from garnishment by debt collectors.

Taxpayers should know, however, that stimulus payments claimed through a tax return will not, right now, be protected from garnishment by debt collectors. NCLC has an issue brief on how Congress can, and should, still protect tax refunds and offsets, such as the Earned Income Tax Credit and Child Tax Credit from garnishment, but time is running short for action. In the meantime, for those at risk of garnishment, other than requesting a paper check, NCLC has a series of *Tips for*

Dealing with Bank Account Freezes and Seizures with strategies for protecting bank accounts from garnishment.

ANOTHER YEAR OF REFUND DELAYS FOR VULNERABLE TAXPAYERS

The start of tax season was delayed from the usual third or last week of January to February 12 because of changes to the tax law from the December 2020 stimulus package. Under the Protecting Americans from Tax Hikes (PATH) Act, the Internal Revenue Service (IRS) is required to delay until mid-February the *entire* refund requested by taxpayers claiming the Earned Income Tax Credit (EITC) or Additional Child Tax Credit (ACTC). This delay, first implemented in 2017, is intended to give the IRS more time to stop fraudulent refund requests. In practice, though, it has resulted in unfair prolonged delays of legitimate refunds owed to struggling taxpayers.

Even with the delayed February 12 start date to tax season, the IRS claims that it will not extend the date when it expects to start sending EITC or ACTC refunds. The IRS expects the first EITC and ACTC refunds to be available starting in the first week of March if taxpayers file their return online, choose direct deposit, and there are no other issues with their return. But if an EITC/ACTC recipient files their return on February 12, it is unclear whether the IRS will really be able run the return through all the fraud filters in three days by February 15 so that the taxpayer receives their refund by the first week of March.

Taxpayers can check the real-time status of their refunds using the IRS website's automated Where's My Refund function.

TAX-TIME FINANCIAL PRODUCTS: LENDERS CONTINUE TO EVOLVE IN EFFORTS TO CAPTURE MORE TAXPAYER REFUNDS

In the past, refund anticipation loans (RALs), loans secured by and repaid directly from a consumer's tax refund, featured fees that translated into triple-digit Annual Percentage Rates (APR) and diverted significant portions of taxpayers' refunds into the pockets of banks and preparers. These first-generation RALs disappeared in the early 2010s, but the industry is moving slowly back to them.

After a couple of years focusing largely on second-generation "no-fee" RALS, tax-time lenders again started offering loans accompanied by a charge, although the no-fee version is still more popular. Products this year will include:

- **Refund anticipation checks (RACs)** – RACs provide a way for the tax preparer to recoup preparation fees from the tax refund, the balance of which is then provided to the taxpayer by direct deposit, check, or prepaid card. The product essentially serves as a short-term loan of the fees a consumer would otherwise pay out of pocket to have the return prepared. At least one tax-time product company is now acting as a debt collector, chasing taxpayers for tax preparation fees if their return isn't funded.
- **Refund anticipation loans (RALs) continue to be offered in two flavors:**
  - **"No-fee" RALs** – Consumers supposedly pay nothing for these RALs, but some preparers may recoup costs by imposing additional fees or other indirect charges.
  - **Interest-bearing RALs –** These loans have disclosed interest rates up to 39.95%, but disclosures may not accurately reflect these costs because of additional fees. More details are in the next section.

Refund Anticipation Checks

Refund anticipation checks (RACs), also known as refund transfers, are now the most common tax-time financial product. With a RAC, a refund is directly deposited in a temporary bank account that a bank opens for a taxpayer, and the preparer deducts the tax preparation fee and any other authorized fees, and then disburses what's left to the consumer – either by direct deposit, on a prepaid card, or by check. RAC fees hover around $30 to $40[1] but can range from $20[2] all the way up to $64 at H&R Block if the consumer wants a paper check[3].

The high fee for a paper check at H&R Block is noteworthy as lenders may push consumers towards more profitable products, like prepaid cards, by making that option less expensive. Lenders can incentivize the use of certain products both by reducing or eliminating fees to taxpayers who use those products or by giving kickbacks to tax preparers when consumers use products like prepaid cards. For instance, in one of its programs, EPS (a division of MetaBank) increases its kickback to tax preparers from $12 for direct deposit or a check to $25 for a disbursement on a prepaid card.[4]

Consumers may not understand that choosing a RAC does not deliver the refund more quickly. Instead, it basically works as a short-term loan of the tax return preparation fee by deferring payment of that fee until the refund arrives. Even so, at a time when nearly 40% of Americans said they could not afford an unexpected $400 expense, and with unemployment reaching 14.7% (and even higher rates for people of color), it's easy to understand why taxpayers cannot pay tax prep fees up-front so that these products have endured. For the 2019 filing season, which is the most recent IRS data available to NCLC, taxpayers paid for nearly 21 million RACs, which was a slight decrease from the previous year.[5] Given the economic challenges caused by the COVID-19 crisis, NCLC advocates fear that the use of tax-time products may increase dramatically this season.

NCLC advocates warn consumers to carefully compare the benefits of a RAC to its cost before taking one. Paying $40 to defer a tax preparation fee of $300 for three weeks is equivalent to paying an annual percentage rate (APR) of 232% for a short-term loan to pay tax prep fees.

Debt Collection by RAC Provider

In a new and disturbing twist for 2021, at least one RAC provider, Santa Barbara TPG (TPG), has gotten into the third-party debt collection business with their Auto Collect service. TPG is offering to "Collect payments from clients with refunds that didn't fund" – i.e., those who do not ultimately receive a refund sufficient to cover the tax prep fee. TPG will contact taxpayers with a Refund Transfer that is at least one month past their expected IRS funding, offering the option to pay by credit card or bank account. If the taxpayer does not respond, TPG will debit tax preparer fees from the taxpayer's bank account if the client had requested a direct deposit disbursement. TPG collects a processing fee of 25% of the amount collected and the remainder is deposited into the tax preparer's bank account.[6]

In a new and disturbing twist for 2021, at least one Refund Anticipation Check provider, Santa Barbara TPG (TPG), has gotten into the third-party debt collection business with their Auto Collect service.

Depending on how TPG's service works, there may be legal issues. The Electronic Fund Transfer Act and Regulation E require consumer authorization to debit bank accounts, and require clear and readily understandable disclosures.[7] Industry rules (which apply to electronic debits made through the Automated Clearinghouse system) also require notice of a right to revoke authorization. TPG also appears to be acting as a third-party debt collector and thus subject to the Fair Debt Collection Practices Act.

Most consumers can avoid this relatively high-cost product or the perils of debt collection by using the available free tax preparation resources (see page 12).

Refund Anticipation Loans

Tax preparers and lenders are again offering interest-bearing RALs in the ongoing quest to skim as much of taxpayers' refunds as possible. Taxpayers seeking the no risk, "no-fee" RALs of years past could instead end up with interest-bearing loans instead or no loan at all.

Taxpayers must file their return with a preparer *before* they can receive a decision on their RAL request. Because these RAL applications appear to be subject to underwriting, many lower income taxpayers who qualified for RALs in the past may no longer qualify. But they won't know until *after* the return is filed – tethering them to the preparer even if the RAL is rejected.

"No-fee" RALs

After a period of relative obsolescence, RALs made a comeback a few years ago in a different form: the "no-fee" RAL. These second-generation RALs dominated the market in 2017, when demand for them tripled over the prior year.

With a no-fee RAL, the taxpayer borrows a limited amount when filing the return. Lenders call these "advances," but they are actually loans secured by the anticipated tax refund. While these loans purport not to impose a fee or interest charge on the consumer, there are still risks and costs. In 2017, about 1.7 million taxpayers applied for RALs and the IRS did not distinguish between no-fee and fee bearing RALs. In 2018, the IRS did separate out no-fee and fee-bearing RALs and there were 1,651,000 million no-fee RALs and 356,000 fee-earning RALs. In 2019, there were slightly more no-fee RALs at 1,658,000.[8] and slightly fewer fee-bearing RALs at 349,000.

Examples of no-fee RALs range in maximum available amounts of:

- $4,000 provided by First Century Bank, N.A. through Intuit TurboTax on a Turbo Visa Debit Card issued by Green Dot Bank,[9]
- $3,500 provided by MetaBank, N.A. with H&R Block,[10] and
- $4,000 provided by MetaBank, N.A. at Jackson Hewitt.[11]

Larger maximum amounts seem to be the trend with smaller increments available.

Lenders charge preparers a fee for each approved RAL, which gives preparers an incentive to recoup the fee from the consumer. EPS Tax Solutions makes this explicit — they offer preparers the option to enroll in kickback programs that charge consumers a higher price for a RAC. EPS charges $39.95 for a RAC in the e-bonus program as opposed to $20 for the e-collect program. The higher RAC fee charged by these programs has the effect of shifting the preparer's loan fee to the consumer. Assuming that most consumers who take no-fee RALs also take RACs, this provides a secret way for preparers to defray their own costs on the backs of the taxpayer.[12]

Preparers may also recoup fees by inflating tax preparation costs in the form of add-on junk fees. With the lack of fee transparency still so prominent in the tax preparer industry, there are endless opportunities for preparers to recoup these fees from consumers even where the preparer's contract with the lender expressly prohibits it from passing on the fees to consumers.

And, even if the "no-fee" RAL is truly cost free, it could serve as a Trojan horse for interest-bearing RALs.

Interest-bearing RALs Keep Consumers on the Hook

The RAL landscape is in flux this year. One participant, River City Bank, exited the market completely. Some lenders are staying pat with loan amount and APRs while others increased rates for most or all loans. These RALs impose interest on the full amount of the loan. As in the last two years, the "non-recourse" or "no-risk" statements of earlier years are conspicuously absent.

Examples of interest-bearing RALs this year include:

- **MetaBank**'s Go Big Refund Advance loan has again reduced its largest loan amount in 2021, going from $7,000 at 35.9% APR in 2019[13], to $6,400 with a fee of 2% of the loan amount in 2020[14], to $6,000 with a fee of 2.5% in 2021[15]. Jackson Hewitt, which markets the MetaBank loans, notes that a $1,500 loan under this program would have an APR of 30.42%, assuming a loan duration of 30 days. However, if we assume a loan duration of 14 days, the APR would be 65%. Availability of these loans ended on January 31, 2021.
- **River City Bank** is no longer processing tax refunds and has closed the Tax Division department as of December 30, 2020.[16] Santa Barbara TPG has set up a webpage for River City Bank clients who need a new banking partner, touting "an aggressive taxpayer advance" and the "industry-first auto collect service".[17]
- **First Century Bank, N.A.** provides the Fast Cash Advance RAL through Santa Barbara TPG, which then offers the product to tax preparers. This year, these loans range from $500-$6,000 and are offered at an APR of 39.95% no matter the amount and whether or not the IRS has already acknowledged the tax return or not.[18] This is in contrast to 2020 when the APRs were in tiers of 0%, 16%, and 45% depending on the amount and whether or not the IRS had acknowledged the refund.[19]
- **Republic Bank & Trust Company** continues to provide the RALs for Liberty Tax, offering the Easy Advance product in increments of $500, $800, $1,300, $2,500, $3,000, $4,750, and $6,250, at 35.99% APR as they did last season.[20]

There seems to be some movement toward the Republic Bank model of charging one price for all loans no matter the amount of the RAL. This results in larger loan costs for many taxpayers who select lower loan amounts and might have qualified for a lower cost product in previous years.

FREE TAX PREP REMAINS IMPORTANT; FEES REMAIN A BLACK BOX AT THE MAJOR TAX PREPARATION CHAINS WITH ONE NOTABLE EXCEPTION

More than half of taxpayers use a paid preparer to do their taxes. EITC taxpayers are more likely to use a paid preparer for a number of reasons, including that their returns are more complex than some other taxpayers. This large captive market, coupled with a historical refusal to provide up-front price information to consumers, has long allowed tax preparers to ignore consumers' demands for pricing clarity.

In 2018, H&R Block broke away from the industry norm and launched a transparent pricing program. Under this program, taxpayers can determine the base price for their returns at the outset. From there, an in store price list by form will permit most people to compute the cost of the return before work ever begins. As online and virtually assisted tax preparation grows, there is more upfront pricing for those services with the major chains. However, it's not clear that upfront pricing carries over to in-person preparation. Preparers should reform their practices so that consumers can see a price sheet online and in store windows that makes it clear what each form or service will cost at brick-and-mortar locations.

Lower- and middle-income taxpayers can avoid fees altogether by accessing one of several free alternatives for tax return preparation and filing. The AARP Tax Aide programs provides free return preparation and e-filing for taxpayers over 50. The Volunteer Income Tax Assistance (VITA) and the Tax Counseling for the Elderly (TCE) programs offer free tax preparation and electronic filing to eligible taxpayers though some VITA and TCE sites are operating at reduced capacity or their physical locations are closed due to COVID.

Taxpayers making up to $72,000 may also choose to prepare and electronically file their own tax returns online using software made available for free to eligible taxpayers through the IRS Free-File Program.

PRIVATE DEBT COLLECTORS: CONSUMERS SHOULD DEMAND THAT THEIR ACCOUNTS BE RETURNED TO IRS WHEN CONTACTED

A 2015 law requires the IRS to use private debt collectors to collect certain unpaid federal tax debts. Despite the well-documented abuses in the debt collection industry, the IRS, in designing the private debt collection (PDC) program, put cost-effectiveness over thoughtful oversight of collectors. This action has been to the detriment of vulnerable and lower-income taxpayers.

The IRS appears to have ramped up the PDC program in 2020. Since 2017, the IRS has assigned 3.28 million taxpayer accounts to private debt collectors, with a value of $30.1 billion. As of May 2020, private collectors had collected $498.4 million in commissionable payments — *with 45% of that amount collected in the first two-thirds of 2020*.[21]

However, taxpayers are not obligated to talk to a private debt collection agency. Taxpayers have the right to demand in writing (recommended) or orally that their tax debt account be recalled from the private collector and returned to the IRS immediately.

The Fair Debt Collection Practices Act (FDCPA) also applies to private debt collectors collecting federal tax debts. This law gives consumers the right to send a written request to a debt collector to stop contacting them. The FDCPA protects consumers against debt collection harassment and deception. Most notably, it provides a legal remedy for violations. Consumers who believe they are the victim of a debt collection violation can find a lawyer who specializes in the FDCPA through the directory provided by the National Association of Consumer Advocates.

Taxpayers may wish to exercise their right not to interact with private debt collectors because of the problems with the program including:

- **Inappropriate Payment Plans and Commissions**: In fiscal year 2019, the IRS began allowing private collectors to seek supposedly "voluntary" payment plans and take commissions that were not explicitly authorized by the statute (I.R.C. § 6306) or the collection contract. The Office of Audit commented that "[b]y paying PCAs commissions on taxpayer voluntary payments which are not part of a qualified tax collection contract, the IRS is again finding a way to work around the plain meaning of the language in I.R.C. § 6306 for the benefit of PCAs."[22] Between August 30, 2019 and May 2020, 7,704 taxpayers were placed into these supposedly voluntary payment plans. Of these taxpayers, 54% had made no payments at all and 20% had made only one payment, which means about 75% of these taxpayers did not end up paying according to their agreements. The U.S. Treasury Inspector General for Tax Administration (TIGTA) noted in a recent report that "Continuing to allow PCAs to accept unstructured payments without a review of a taxpayer's financial situation increases the likelihood that these taxpayers will be put into a financial hardship situation and will eventually default."[23]

- **Low-income Taxpayers May Still be Impacted by Private Collectors**: The Taxpayer First Act, as discussed in NCLC's 2020 report, mandated that after December 31, 2020, private collectors are no longer able to collect on accounts where:
    - Substantially all of a taxpayer's income is from Social Security Disability Insurance benefits or Supplemental Security Income, or
    - A taxpayer's adjusted gross income is at or below 200% of the Federal Poverty Level.[24]

TIGTA's most recent report, however, expressed concern that, even after altering their methodology to identify low-income taxpayers in response to the National Taxpayer Advocate's concerns, some low-income taxpayers will still be assigned to private collectors.[25] The IRS should follow TIGTA's recommendation to use "both last return filed information and third-party income information in its methodology to exclude low-income taxpayers from PCA inventory."[26]

TAXPAYERS WHO RECEIVE A 1099-C FOR A DISCHARGED DEBT HAVE OPTIONS

When a debt is discharged or forgiven, the creditor generally sends a 1099-C to the IRS and the borrower suggesting that the amount of debt forgiveness is income to the borrower. The IRS then will assess taxes on this forgiveness "income." This can be an additional blow to the taxpayer who was already in dire enough financial straits that the creditor believed the debt could not be paid and thus the creditor wrote off or forgave the debt.

There are several ways for taxpayers who receive these 1099-Cs to eliminate or reduce taxes. But they need the help of an attorney or enrolled agent. If taxpayers cannot afford an attorney, they should contact the nearest Low-Income Tax Clinic.

RELATED RESOURCES

- IRS free return preparation for older and low- and middle-income filers
- IRS Where's My Refund for real-time status of tax refunds
- AARP Tax Aide free return preparation and e-filing for taxpayers over 50
- **NCLC Report:** *2020 Tax Season: More Delays and Higher Costs for Struggling Taxpayers*, January 2020
- **NCLC Report:** *2019 Tax Season: The Return of the Interest-Bearing Refund Anticipation Loan and other Perils Faced by Consumers*, April 2019
- **CFA Infographic**: Choosing Your Preparer Wisely!, April 2016
- State Model Law to Ensure Competent Paid Tax Preparers
- NCLC's Online Resources on Taxes

ENDNOTES

[1] Santa Barbara TPG Refund Transfer ($39.95) (viewed February 3, 2021).
[2] EPS Refund Transfer Program (viewed February 3, 2021).
[3] H&R Block Refund Transfer (viewed February 3, 2021).
[4] EPS E-bonus Program Terms and Conditions (viewed February 3, 2021).
[5] Data from IRS, on file with authors.
[6] TPG Auto Collect (viewed February 3, 2021).
[7] The EFTA and NACHA rules are described in Chapter 5 of National Consumer Law Center, Consumer Banking and Payments Law (6th ed. 2018), update online at library.nclc.org. [not sure of the exact cite]
[8] Freedom of Information Act response from IRS. On file with the National Consumer Law Center.
[9] Intuit Refund Advance (viewed February 4, 2021).
[10] H&R Block Refund Advance (viewed February 4, 2021).
[11] No Fee Refund Advance at Jackson Hewitt (viewed February 4, 2021).
[12] EPS, E-Bonus, Terms and Conditions (viewed February 4, 2021), EPS, E-collect (viewed February 4, 2021).
[13] Chi Chi Wu, Mandi Matlock, National Consumer Law Center *2019 Tax Season: The Return of the Interest-Bearing Refund Anticipation Loan and other Perils Faced by Consumers*.
[14] Jackson Hewitt® Offices Open For 2020 Tax Season, Announces Refund Advance Options, Dec. 18, 2019.
[15] Jackson Hewitt Refund Advance (viewed February 4, 2021).
[16] River City Bank (viewed February 4, 2021).
[17] Need a New Bank? (viewed February 4, 2021).
[18] Santa Barbara TPG, Fast Cash Advance, (Viewed January 18, 2021).
[19] NCLC, *2020 Tax Season: More Delays and Higher Costs for Struggling Taxpayers*, January 2020.
[20] Liberty Tax Easy Advance (viewed February 4, 2021).
[21] Fiscal Year 2021 Biannual Independent Assessment of Private Collection Agency Performance, pg. 2.
[22] Fiscal Year 2021 Biannual Independent Assessment of Private Collection Agency Performance, pg. 16.
[23] Id. At 15.
[24] National Taxpayer Advocate Annual Report to Congress, pg. 98, 2019.
[25] Fiscal Year 2021 Biannual Independent Assessment of Private Collection Agency Performance, pg. 19.
[26] Id. At 20.

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