

RECEIVABLES MANAGEMENT CERTIFICATION PROGRAM

Program Overview

The Receivables Management Association International (RMAI) is a nonprofit trade association that represents the interests of more than 600 businesses within the receivables management industry, including banks, credit unions, nonbank lenders, debt buying companies, collection agencies, law firms, brokers, and industry-related product and service providers. RMAI's Receivables Management Certification Program (RMCP) sets the global standard within the receivables management industry by providing enhanced operational controls and consumer protections through rigorous and uniform industry standards of best practice. Founded in 1997, RMAI began certifying businesses and individuals in 2013. As of 2025, there are 520 active certifications that have been authorized.

A Single Compliance Footprint for Receivables

Individual Certification

The **Certified Receivables Compliance Professional (CRCP)** designation is required for the Chief Compliance Officer of every RMAI certified business and is a voluntary designation for others within the industry. Every two years, individuals must pass a criminal background check conducted by RMAI and obtain 24 continuing education credits in subjects related to the receivables management industry, including 2 required ethics credits and 1 credit on identifying and avoiding discriminatory collection practices.

Business Certification

Certifications are granted to businesses that comply with uniform and rigorous industry standards of best practices and pass an RMAI conducted criminal background check of the business, its owners, and its executive management. All standards meet federal and state statutory requirements and most exceed these requirements or create standards where none existed (see reference key). RMAI certification designations that are offered to businesses include:

- **Certified Receivables Business (CRB)** The certification issued for debt buying companies, law firms, and collection agencies.
- **Certified Receivables Vendor (CRV)** The certification issued for vendors that have or are looking to develop a business relationship with CRBs. To date, this designation has been issued to brokers and process servers.

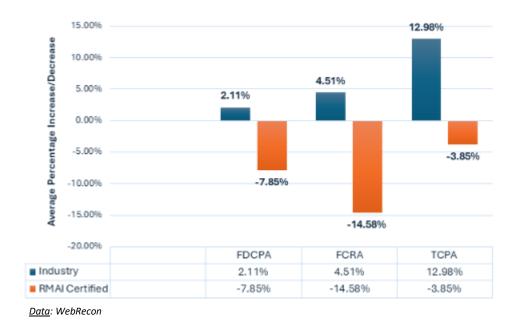
Three Types of Compliance Audits & Attestation

- **Pre-Certification Audit** Performed by an independent third-party auditor <u>prior</u> to the initial application. The audit is required to be submitted with their application for certification.
- **Full Compliance Audit** Performed by an independent third-party auditor at the <u>mid-point</u> of each three-year certification cycle.
- **Limited Compliance Audit** Performed by an independent third-party auditor in response to specific and credible third-party allegations of non-conformity. A Limited Compliance Audit can be performed at <u>any</u> time at the direction of the Certification Audit Committee.
- **Self-Compliance Attestation** Performed <u>prior</u> to the initial application and every three (3) years thereafter when reapplying for certification. The self-compliance attestation must be completed as part of the application and will be subject to independent third-party audit verification.

Results of RMAI Certification

RMAI is pleased with statistics demonstrating the efficacy of the RMAI Certification Program when comparing various sources of publicly accessible data.

Lawsuits – When analyzing the trend of consumer-initiated FDCPA, FCRA, and TCPA lawsuits filed against industry participants in federal courts in 2023 and comparing it to lawsuits filed in 2024, RMAI Certified Businesses outperformed the industry:



CFPB Complaints – When analyzing the CFPB Consumer Complaint Portal, RMAI Certified Businesses had impressive results that we feel are indicative of businesses that maintain robust industry standards of best practice that are contained in a high-performing self-regulatory program:

- 100 percent of CFPB complaints, disputes, and inquiries have received a response
- 96.4 percent of RMAI certified businesses have statistically zero CFPB complaints, disputes, or inquiries
- Only 1 out of 5,000 accounts in collections receive a CFPB complaint, dispute, or inquiry

Evolution of RMAI Certification

	Version 1.0	Version 13.0
Standards	19	63
Certification Eligibility	Debt Buyers	Debt Buyers, Collection
		Agencies, Law Firms, Brokers,
		Process Servers, and Vendors
Active Certifications	35	520
Asset Classes with Data &	Credit Cards	Credit Cards, Bankruptcy,
Document Requirements		Installment Loans, Judgments,
		Medical, Student Loans, and
		Vehicles & Equipment

BBB National Programs

As of March 1, 2024, BBB National Programs serves as the independent third-party administrator of the RMCP Remediation Committee. This collaboration underscores RMAI's proactive approach to consumer protection and reinforces our members' commitment to ethical conduct and dedication to advancing marketplace trust through industry self-regulation and dispute resolution.

Feedback and Contacts

RMAI encourages feedback on the Certification Program to ensure the program requirements continually evolve and remain the most comprehensive national standard of best practices for the industry. Send your comments to David Reid (RMAI General Counsel) at dreid@rmaintloog or Shannon Parod (RMAI Director of Certification & Administration) at sparod@rmaintloog or call (916) 482-2462. The full version of the Receivables Management Certification Program's Governance Document is available at www.rmaintloog/governancedocument. More information on RMAI Certification is available at www.rmaintloog/certification.

CERTIFICATION COMPARISON CHART

REFERENCE KEY		
No Federal and/or State Statutory Requirements	Stronger than Federal and/or State Requirements	Meets Federal & State Statutory Requirement
^A Amended in Version 13.0		
^N New in Version 13.0 (no new standards in 2025)		

Certified Receivables Business (CRB)		
Series "A" Standards		
	ng Companies, Collection Law Firms and Collection Agencies	
^A Standard # A1 Laws & Regulations	Requires compliance with FDCPA, TCPA, FCRA, SCRA, EFTA, GLBA, Reg F, Dodd-Frank, U.S. Bankruptcy Code, as well as state and local consumer protection laws.	
Standard # A2	Requires a minimum insurance threshold for cyber and errors & omissions policies	
Insurance Coverage	based on annual receipts resulting from debt collection.	
Standard # A3	Requires a criminal background check on all new full and part time prospective	
Criminal Background Checks	employees who will have access to consumer data.	
Standard # A4	Requires annual employee training on RMAI Certification Standards, corporate	
Employee Training Programs	policies and procedures, and laws and regulations.	
^A Standard # A5	Requires policies and procedures that instruct employees how to handle and	
Complaint and Dispute	process consumer complaints and disputes in compliance with the law. Requires	
Resolution	the policy to conform to components of a "reasonable consumer complaint and	
	dispute resolution policy."	
Standard # A6	Requires the maintenance of a master database of all state and federal consumer	
Consumer Notices	notice requirements and comply therewith.	
^A Standard # A7	Requires a data security policy that: (1) meets or exceeds state and federal laws and	
Data Security	regulations; (2) requires an annual risk assessment and to make adjustments based	
	on the results; and (3) conforms to the components of a "reasonable data security	
	policy," the requirements of which align with the FTC Safeguards Rule.	
^A Standard # A8	Requires the business to: (1) establish a portal for the receipt of consumer	
CFPB Consumer Complaint	complaints, disputes, and inquiries with the CFPB, (2) respond to all complaints,	
System	disputes, or inquiries according to CFPB's prescribed guidelines, and (3) annually	
	analyze the volume and nature of the consumer complaints, disputes, and	
	inquiries.	
Standard # A9	Requires all payments to be processed consistent with any instructions given by	
Payment Processing	the consumer at the time of payment.	
Standard # A10	Requires compliance with all state and municipal collection licensing laws.	
State Licensing Requirements		
^A Standard # A11	Requires notifying credit bureaus within 30 days of: (1) identifying inaccurate	
Credit Bureau Reporting	information; (2) a consumer disputing the accuracy of a report; and (3) a change	
	in ownership of a receivable, unless the tradeline was deleted.	
Standard # A12	Prohibits the bringing a lawsuit on a debt that is beyond the statute and prohibits	
Statute of Limitations	the reviving of an out of statute account through receipt of a payment.	
Standard # A13	Requires the position of Chief Compliance Officer (CCO) charged with internal	
Chief Compliance Officer	compliance. CCO is required to maintain an <u>Individual Certification</u> based on	
	receiving ongoing educational requirements related to collection laws and	
	regulations and industry best practices.	

Standard # A14	Paguires the maintenance of a publish accessible website which publishes
Website & Publication	Requires the maintenance of a publicly accessible website which publishes
Website & Publication	contact information for the company and the Chief Compliance Officer and
^A Standard # A15	provides a link to RMAI's consumer education web page.
	Requires vendor management policies and procedures with defined due diligence
Vendor Management	and/or audit controls. Must perform annual assessment of its policy and third-
	party vendors to determine whether they continue to meet or exceed program
6. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	requirements.
Standard # A16	Requires policy requiring an affiant be under oath and in the presence of a notary
Affidavits	and provide truthful and accurate statements based on personal knowledge or
Charles I II A47	being familiar with the business records.
Standard # A17 Commissions	Requires all commissions or bonuses based on collection activity to include
	compliance-related criteria for the payment of such forms of compensation.
Standard # A18	Requires certified businesses to: (1) refrain from communicating with consumers
State of Emergency	regarding a debt when there is a natural disaster that is impacting a community;
	(2) implement their consumer hardship policy when FEMA has declared an
Standard # A19	emergency; and (3) avoid soliciting or attaching to government relief funds.
Social Media	Prohibits initiating engagement with a consumer on a public facing social media platform for the purposes of, or related to, debt collection. Permits the use of
Social Media	publicly available information and private communication tools.
Standard # A20	Requires maintaining a consumer hardship policy that includes: (1) actively
Hardship Policy	listening for words that would suggest a consumer is experiencing a hardship; (2)
Trandship Folicy	accepting consumer requests in oral and written form; (3) providing consumers
	with all available options that are contained in the hardship policy; (4) ceasing
	collection activities when the consumer's only income is from exempt sources;
	and (5) placing collection holds on all open accounts with the same consumer.
^A Standard # A21	Requires any company wishing to perform collection activities from a remote
Remote Office	location to comply with an extensive list of requirements that are modeled after
	those adopted in Maryland and Washington State in 2020.
Standard # A22	Requires a policy designed to prevent discriminatory practices in the collection of
Discriminatory Collection	debt, including through the use of computer algorithms and artificial intelligence.
Practices	
Standard # A23	Requires the recording of consumer communication restrictions and based on
Communication Restrictions	statutory, regulatory, or contractual requirements to transmit those restrictions
	to clients, agents, or purchasers.
	Series "B" Standards
	Debt Buying Companies and Creditors
Standard # B1	Credit Cards – 22 data and document elements (consistent with CFPB and OCC
Purchase & Sale Documentation	mandated practices); Auto Deficiencies – 20 data and document elements; Auto
Requirements	Secured – 19 data and document elements; Bankruptcy – 19 data and document
	elements; <i>Installment Loans</i> [Traditional and Fintech] – 27 data and document
	elements; <i>Judgments</i> – 21 data and document elements; <i>Medical</i> – 39 data and
	document elements; Student Loans – 33 data and document elements; and
	Commercial Debt – 43 data and document elements (combined).
Standard # B2	Requires the inclusion of five specific representations and warranties in all
Representations & Warranties	purchase agreements.
Standard # B3	Requires reasonable due diligence be performed on entities the company seeks to
Due Diligence	contract with for the purchase or sale of receivables prior to the transmission or
Charles III S.	receipt of any account level data.
Standard # B4 Sale Restrictions	Prohibits the sale of accounts when: (1) the seller does not have access to original account-level documentation; (2) the consumer disputes the validity or accuracy

of the debt; (3) an account has been settled-in-full, parmanently closed due to Consumer hardship, or permanently closed pursuant to a regulatory or judicial order; (4) the account has been identified as having been created as a result of identity theft or fraud; (5) the account has been "discharged and closed" in bankruptcy, except when associated with secured liens or obligations associated with a non-bankrupt co-obligor; and (6) terms and conditions are not contained in the sales agreement that requires the purchaser to meet or exceed RMAI certification standards. Standard # B5 Requires the transmission of data and documents to per diem counsel at least three (3) business days prior to the date of a scheduled court appearance. Standard # B6 Prohibits the accruing of interest on credit card accounts after charge-off and prior to judgment. Series "C" Standards Collection Law Firms Standard # C1 Requires attorneys employed by the firm to be admitted to the Bar and remain in good standing. Standard # C2 Requires attorneys employed by the firm to receive biennial legal education related to collection law and/or collection litigation. *Standard # C3 Requires a minimum insurance threshold for legal malpractice insurance based on annual receipts resulting from debt collection legical services. *Standard # C4 Requires strust accounts at a federally insured financial institution for the segregation of client funds following rules for such accounts established by the state bar. Standard # C5 Requires attorneys to review documents, venue, applicable statute of limitations, court procedures, and applicable laws and regulations before suit is filed. *Standard # C6 Requires attorneys to review documents, venue, applicable statute of limitations, court procedures, and applicable laws and regulations before suit is filed. *Standard # C6 Requires electronically imaged copies of all collection-related judgments and to transmit a copy of the judgment to the judgment before suit is filed. *Standard # C7 Requires elect		closed due to Consumer hardship, or permanently closed pursuant to a regulatory or judicial order; (4) the account has been identified as having been created as a result of identity theft or fraud; (5) the account has been "discharged and closed" in bankruptcy, except when associated with secured liens or obligations associated with a non-bankrupt co-obligor; and (6) terms and conditions are not contained in the sales agreement that requires the purchaser to meet or exceed RMAI certification standards.
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	Client Inquiries	
	^A Standard # D4	Requires the transmission to a client within three (3) business days any written
Consumer & Regulatory consumer complaints received by the collection agency on one of the client's	Consumer & Regulatory	consumer complaints received by the collection agency on one of the client's
Complaints accounts.	Complaints	accounts.
Standard # D5 Requires collection agencies to cease collection activity on a client's accounts		
Cossisting of Collections upon written notice from the client	Cessation of Collections	upon written notice from the client.

Standard # D6	Requires collection agencies to return all consumer data and/or accounts within
Account Recalls	fourteen (14) business days from receipt of a written request for their return or
	within such period of time as agreed to in writing between the parties.

Certified Receivables Vendor (CRV)		
	Series "100" Standards	
	Vendors	
Standard # 101 Chief Compliance Officer	Requires the position of Chief Compliance Officer (CCO) charged with internal compliance. CCO is required to maintain an <u>Individual Certification</u> based on receiving ongoing educational requirements related to collection laws and regulations and industry best practices.	
Standard # 102 Criminal Background Checks	Requires a criminal background check on all new full and part time prospective employees who will have access to consumer data.	
Standard # 103 Employee Training Programs	Requires annual employee training on RMAI Certification Standards, corporate policies and procedures, and laws and regulations.	
Standard # 104 Insurance	Requires a minimum insurance threshold for cyber crime and errors & omissions policies to which all participants must adhere.	
^A Standard # 105 Data Security	Requires a data security policy that: (1) meets or exceeds state and federal laws and regulations; (2) requires an annual risk assessment and to make adjustments based on the results; and (3) conforms to the components of a "reasonable data security policy," the requirements of which align with the FTC Safeguards Rule.	
Standard # 106 Website & Publication	Requires the maintenance of a publicly accessible website which publishes contact information for the company and the Chief Compliance Officer and provides a link to RMAI's consumer education web page.	
^A Standard # 107 Vendor Management	Requires vendor management policies and procedures with defined due diligence and/or audit controls. Must perform annual assessment of its policy and third-party vendors to determine whether they continue to meet or exceed program requirements.	
	Series "200" Standards	
	Brokers	
Standard # 201 Broker Agreements	Requires the marketing of accounts to be subject to broker agreements that clearly indicate who the client is and prohibits the broker from representing both the buyer and the seller without a signed acknowledgement from both parties.	
Standard # 202 Multiple Listings	Requires commercially reasonable efforts to obtain an exclusivity clause in broker agreements to prevent accounts from being simultaneously listed and marketed by multiple brokers.	
Standard # 203 Due Diligence	Requires reasonable due diligence be performed, on behalf of their client, on parties associated with a sales transaction prior to the transmission of any account level data.	
Standard # 204 Misrepresentation of Accounts	Prohibits brokers from knowingly allowing the seller to misrepresent accounts or to sell accounts that had issues concerning title, accuracy or integrity of account information, fraud, or identity theft.	
Standard # 205 Purchase/Sale Agreement Requirements	Requires brokers to remind their certified clients of the representations and warranties requirements contained in Standard # B2 and the possible consequences associated with noncompliance.	
Standard # 206 Title	Prohibits brokers from taking title or having any ownership interest in the receivables it brokers.	

Series "300" Standards Process Servers	
Standard # 301	Requires a process server to deploy global positioning system (GPS) technology to
GPS Technology	record the time, date, and location of the delivery of service.
Standard # 302	When permitted by law, requires the individual delivering service to take a
Photos/Video	photo/video of the location and manner of service and, in the case of in-person service, the individual being served.
Standard # 303	Requires a process server to perform monthly audits of each employee/agent that
Audits	delivers service by randomly selecting one of the days they worked from the prior month to review.
Standard # 304	Requires process servers to pay their employees/agents the same fee for both
Pricing	successful and unsuccessful service attempts.
Standard # 305	Requires owners and employees of a process server to use another company for
Conflict of Interest	the delivery of service related to their own personal or business interests.
Standard # 306	Requires compliance with all state and municipal process serving licensing laws.
License	