



February 26, 2026

California Department of Financial Protection and Innovation
651 Bannon Street, Suite 300
Sacramento, California 95811
PRO 07-24

RE: PRO 07-24 – Notice of Invitation for Comments on Proposed Rulemaking to Require Registration and Reporting of Consumer-Reporting Providers

I. INTRODUCTION

FreeFrom¹ submits these comments in response to the invitation for comments on proposed rulemaking from the California Department of Financial Protection and Innovation (CA DFPI) to require registration and reporting of consumer-reporting providers under the California Consumer Financial Protection Law (CCFPL).

FreeFrom is a national organization led by queer, trans, im/migrant, Black, Indigenous, and people of color (BIPOC) survivors on a mission to end gender-based violence (GBV) by building economic freedom and safety with survivors. We do this through bold, survivor-led strategies that build our collective power and activate everyone in society to play their part — before, during, and beyond moments of crisis. Starting from our conviction that GBV is an economic issue, our work takes on four main areas: innovating with survivors to create tools, resources, and environments that build survivors’ financial security and support their individual, intergenerational, and community healing; celebrating survivors’ stories of joy, resilience, and strength to instill hope and spur action towards survivor-driven solutions; mobilizing societal institutions — including banks, employers, and governments — to support survivors and enact widespread change; and, resourcing and expanding the movement to end GBV as we work to create a world free from harm. This approach acknowledges that true freedom and safety can only be achieved by tackling the structural, systemic barriers affecting survivors — and that means investing in long-term strategies to create meaningful change.

“I would ask our representatives to please take a look at FreeFrom's list of political and banking reforms so we can accomplish the kind of change we need...Getting to the root of issues would make lasting change which could help us overcome this tremendous setback.” – Grantee of FreeFrom's Safety Fund²

II. THE NEED FOR THE STATE REGULATORS TO SUPPORT THE FINANCIAL SECURITY OF SURVIVORS

FreeFrom appreciates the opportunity to respond to the CA DFPI’s invitation for comments on proposed rulemaking requiring registration and reporting of consumer-reporting providers. To ensure survivors can access financial relief and support, the CA DFPI must implement equitable, inclusive practices.

¹ Learn more about FreeFrom here: <http://www.freefrom.org/>.

² Since 2020, FreeFrom has provided a total of **\$2.2 million** in unrestricted Safety Fund cash grants to over **8,800** survivors in all 50 states, Washington D.C., and Puerto Rico.



A. GBV is Persistent, Pervasive, and Deadly

In the U.S., **1 in 2** ciswomen are subjected to harm by an intimate partner.³ On average, **nearly 24 people per minute** are physically abused by a partner.⁴ **1 in 2** women murder victims are killed by an intimate partner.⁵ The COVID-19 pandemic made matters worse, as the United Nations estimated that the pandemic will reduce progress towards ending gender-based violence over the next decade by **30%**.⁶

Furthermore, many survivors are disproportionately impacted based on their historically marginalized identities. Among Black, Indigenous, and People of Color (BIPOC) survivors: **over 84%** of Native American women,⁷ **53.6%** of Black women,⁸ **up to 55%** of Asian American and Pacific Islander women,⁹ and **34.4%** of Latina women are subjected to GBV in their lifetime.¹⁰ Similarly, LGBTQIA+ survivors are disproportionately subjected to GBV, including **54%** of trans people,¹¹ **61%** of bisexual women,¹² **40%** of lesbian women,¹³ and **1 in 4** gay men.¹⁴

³ Leemis, R.W., Friar, N., Khatiwada, S., Chen, M.S., Kresnow, M., Smith, S.G., Caslin, S., & Basile, K.C. (2022). The National Intimate Partner and Sexual Violence Survey: 2016/2017 Report on Intimate Partner Violence. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. https://www.cdc.gov/nisvs/documentation/nisvsreportonipv_2022.pdf?CDC_AAref_Val=https://www.cdc.gov/violenceprevention/pdf/nisvs/NISVSRReportonIPV_2022.pdf.

⁴ National Coalition Against Domestic Violence. National Statistics Domestic Violence Fact Sheet. Accessed August 29, 2024. <https://ncadv.org/STATISTICS>.

⁵ Ertl, A., Sheats, K.J., Petrosky, E., Betz, C.J., Yuan, K., & Fowler, K.A. (2019). Surveillance for violence deaths – national violent death reporting system, 32 states, 2016. MMWR. Surveillance Summaries, 68(9). <https://www.cdc.gov/mmwr/volumes/68/ss/ss6809a1.htm>.

⁶ UNFPA, Avenir Health, Johns Hopkins University, and Victoria University. (2020). Impact of the COVID-19 Pandemic on Family Planning and Ending Gender-based Violence, Female Genital Mutilation and Child Marriage.

https://www.unfpa.org/sites/default/files/resource-pdf/COVID-19_impact_brief_for_UNFPA_24_April_2020_1.pdf. See, e.g., Kyle Hopkins, “She Asked to be Saved from Him. Now She’s Dead,” ProPublica, July 28, 2020:

<https://www.propublica.org/article/in-remote-villages-domestic-violence-kills-more-than-covid-19>; and Melissa Jeltsen, “As Nation Stays Home, Early Indicators Suggest Rise in Domestic Violence Killings,” HuffPost, April 12, 2020.

https://www.huffpost.com/entry/increase-domestic-violence-killings-coronavirus-stay-at-home_n_5e907808c5b63e73d7e38fe7.

⁷ André B. Rosay. (2016). National Institute of Justice Research Report - Violence against American Indian and Alaska Native women and men: 2010 findings from the national intimate partner and sexual violence survey. U.S. Department of Justice, Office of Justice Programs.

<https://www.ncjrs.gov/pdffiles1/nij/249736.pdf>.

⁸ Leemis, R.W., Friar, N., Khatiwada, S., Chen, M.S., Kresnow, M., Smith, S.G., Caslin, S., & Basile, K.C.

⁹ Yoshihama, M., Dabby, C., & Luo, S. (2020). Facts & Stats Report, Updated and Expanded 2020: Domestic Violence in Asian and Pacific Islander Homes. Oakland, CA: Asian Pacific Institute on Gender-Based Violence.

<https://s3.amazonaws.com/gby-wp-uploads/wp-content/uploads/2020/10/27210551/Facts-stats-rpt-updated-expanded-Oct20201.pdf>

¹⁰ National Domestic Violence Hotline. Abuse in the Latinx Community. Accessed August 29, 2024.

<https://www.thehotline.org/resources/abuse-in-the-latinx-community/#:~:text=According%20to%20the%20National%20Latin.in%20the%20past%2012%20months>.

¹¹ James, S.E., Herman, J.L., Rankin, S., Keisling, M., Mottet, L., & Anafi, M. (2016). *The Report of the 2015 U.S. Transgender Survey*. Washington, DC: National Center for Transgender Equality.

<https://transequality.org/sites/default/files/docs/usts/USTS%20Full%20Report%20-%20FINAL%201.6.17.pdf>

¹² Breiding, M.J., Chen, J., & Black, M.C. (2014). Intimate Partner Violence in the United States – 2010. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. <https://stacks.cdc.gov/view/cdc/21961>.

¹³ Taylor N.T. Brown & Joday Herman, “Intimate Partner Violence and Sexual Abuse Among LGBT People: A Review of Existing Research,”

The Williams Institute (2015). <https://williamsinstitute.law.ucla.edu/wp-content/uploads/IPV-Sexual-Abuse-Among-LGBT-Nov-2015.pdf>.

¹⁴ Id.

B. A Top Obstacle to Survivors' Safety is Financial Insecurity¹⁵

Approximately **84%** of survivors report that not having enough money to support themselves or their children is their biggest barrier to safety.¹⁶ **The stark reality is that GBV is financially devastating for survivors, making long-term safety incredibly expensive.** The Center for Disease Control and Prevention (CDC) estimates that the average lifetime cost of abuse for a ciswoman survivor in the U.S. is a staggering **\$103,767**.¹⁷ On top of this financial burden, **99%** of survivors are subjected to economic abuse¹⁸ – control over their financial resources – by a harm-doer.¹⁹ Economic abuse tactics include harm-doers preventing survivors from going to work, controlling or restricting survivors' access to cash, monitoring or withdrawing from survivors' bank accounts, and incurring debt in survivors' names without their knowledge or consent through credit cards or loans (i.e., coerced or fraudulent debt). In fact, up to **60%** of survivors lose their jobs as a result of GBV-related harm.²⁰ Additionally, **58%** of survivors report that a harm-doer has monitored, accessed, withdrawn from, or otherwise controlled their bank account;²¹ and at least **52%** of survivors are subjected to coerced or fraudulent debt.²²

This means that when survivors try to find safety, they must do so while contending with six figures in costs, no cash or income, fraudulent debt, damaged credit, and no further supports. As such, survivors are **4 times** more likely to have experienced material hardship compared to non-survivors.²³ In a 2020 survey, FreeFrom found that harm-doers steal **\$1,280** from survivors each month; restrict survivors' freedom to spend an additional **\$1,090** of their own money as they see fit each month; and incur **\$15,936** in coerced or fraudulent debt in survivors' names each year.²⁴

¹⁵ See, e.g., Eleanor Lyon. (2000). Welfare, Poverty and Abused Women: New Research and its Implications, National Resource Center on Domestic Violence. <https://vawnet.org/material/welfare-poverty-and-abused-women-new-research-and-its-implications>; Mary Kay, Inc. (2012). 2012 Mary Kay Truth About Abuse Survey Report. Dallas, TX.

<https://content2.marykayintouch.com/Public/MKACF/Documents/2012survey.pdf>; Lyon, E., Lane, S., & Menard, A. (2008). Meeting Survivors' needs: A multistate study of domestic violence shelter experiences. Washington, DC: National Institute of Justice.

http://www.vawnet.org/Assoc_Files_VAWnet/MeetingSurvivorsNeeds-FullReport.pdf; Lyon, E., Bradshaw, J., & Menard, A. (2011). Meeting Survivors' Needs through Non-Residential Domestic Violence Services & Supports: Results of a Multi-State Study. Harrisburg, PA: National Resource Center on Domestic Violence.

<https://vawnet.org/material/meeting-survivors-needs-through-non-residential-domestic-violence-services-supports>; Kimerling, R., Alvarez, J., Pavao, J., Mack, K. P., Smith, M. W., & Baumrind, N. (2009). Unemployment Among Women: Examining the Relationship of Physical and Psychological Intimate Partner Violence and Posttraumatic Stress Disorder. *Journal of Interpersonal Violence*, 24(3): 450-63.

https://www.researchgate.net/publication/5395338_Unemployment_Among_Women/link/0912f50cf569dd2ab400000/download.

¹⁶ Allstate Foundation. (2018). 2018 National poll on domestic violence and financial abuse.

¹⁷ Cora, P., Kearns, M.C., McIntosh, LiKamWa, W., McCollister, K.E., Gordon, A., & Florence, C. (2018). Lifetime Economic Burden of Intimate Partner Violence Among U.S. Adults. *American Journal of Preventive Medicine*. <https://pubmed.ncbi.nlm.nih.gov/30166082/>.

¹⁸ Adrienne E. Adams. (2011). Measuring the Effects of Domestic Violence on Women's Financial Well-Being. Center for Financial Security. University of Wisconsin-Madison. <https://cfs.wisc.edu/wp-content/uploads/2015/04/adams2011.pdf>.

¹⁹ FreeFrom uses the term, harm-doer, to acknowledge that we all have the capacity to cause harm in relationships and that the line between who is a harm-doer and who is a survivor is often blurred with this intergenerational, systemic issue. A world without GBV requires healing for all.

²⁰ Ridley, E., Rioux, J., Lim, K.C., Mason, D., Houghton, K.F., Luppi, F., & Melody, T. (2005). Domestic Violence Survivors at Work: How Perpetrators Impact Employment. Maine Department of Labor and Family Crisis Services.

https://www1.maine.gov/labor/labor_stats/publications/dvreports/survivorstudy.pdf.

²¹ As part of the grant process for our Safety Fund, FreeFrom was able to gather data from **more than 2,100** survivors about their financial situation in this 2022 report. FreeFrom. (2022). *Support Every Survivor: How Race, Ethnicity, Gender, Sexuality, and Disability Shape Survivors' Experiences and Needs*. <https://www.freefrom.org/wp-content/uploads/2022/10/Support-Every-Survivor-PDF.pdf>.

²² Adams, A. E., Littwin, A. K., & Javorka, M. (2019). The Frequency, Nature, and Effects of Coerced Debt Among a National Sample of Women Seeking Help for Intimate Partner Violence. *Violence Against Women*, 26(11), 1324-1342. DOI: <https://doi.org/10.1177/1077801219841445>.

²³ As part of the grant process for our Safety Fund, FreeFrom was able to gather data and stories from **more than 1,300** survivors about their financial situation in this 2020 report. Doyle, K., Durrence, A., & Passi, S. (2020). *Survivors Know Best: How to Disrupt Intimate Partner Violence during COVID-19 and Beyond*. FreeFrom. <https://www.freefrom.org/wp-content/uploads/2021/06/Survivors-Know-Best.pdf>.

²⁴ Id.



Furthermore, the results from FreeFrom’s 2022 study found that, at the time of the survey, survivors were subjected to an average of **\$10,120** in abuse-related costs (such as medical bills, therapy costs, relocation costs, lost/stolen wages or income, coerced/fraudulent debt), and at the same time have only **\$289** that they alone can access and just **\$10** in savings.²⁵ It is unsurprising then that the same study found that, using the Consumer Financial Protection Bureau’s (CFPB) Financial Well-Being Scale, survivors’ financial well-being is in the **bottom 10th percentile** for adults in the U.S.²⁶

“I had no control over my finances for 20 years, and my husband racked up debt, told me setting up my own 401k was me stealing money from him, and he also opened a credit card in my name without my knowledge. I am using most of my income now to try to pay back debt.” – Grantee of FreeFrom’s Safety Fund

Once again, GBV—and more specifically, economic abuse—disproportionately impacts BIPOC and LGBTQIA+ survivors. In addition to overcoming the costs associated with GBV and the effects of economic abuse, BIPOC and LGBTQIA+ survivors have to contend with other intersecting systemic oppressions that make building wealth more difficult for them. This includes the gender and race income and wealth gaps. For every \$1 White men earn, Asian American and Pacific Islander women earn **only 80 cents**,^{27, 28} Black women earn **only 63 cents**,²⁹ Native American women earn **only 59 cents**,³⁰ and Latina women earn **only 58 cents**.³¹ For every \$1 White men own, Black and Latina women own **only pennies**,³² and Native American women own **less than 1/10** of the median wealth of all Americans.³³ LGBTQIA+ survivors also face greater financial challenges, with LGBTQIA+ people subjected to poverty at a higher rate of **21.6%** compared to cisgender heterosexual people at **15.7%**.³⁴ Additionally, transgender people are **more than 3 times** as likely as the general U.S. adult population to have an annual household income of **less than \$10,000**.³⁵ Moreover, people who are both BIPOC and LGBTQIA+ are more likely to face compounded financial difficulties; **19%** of Black transgender people, **18%** of Latine/x transgender people, **16%** of Native American transgender people, and **15%** of Asian transgender people have an annual household income of **less than \$10,000**, compared to **9%** of White transgender people.³⁶

C. State Regulators Must Better Support Survivors

²⁵ FreeFrom. (2022).

²⁶ Id.

²⁷ National Partnership for Women & Families. (2024). Fact Sheet: Asian American, Native Hawaiian and Pacific Islander Women and the Wage Gap. <https://nationalpartnership.org/wp-content/uploads/2023/02/asian-women-and-the-wage-gap.pdf>.

²⁸ It is important to acknowledge that the AAPI community is not a monolith and hence there exists disparities across ethnic groups in the AAPI community, including income disparities. For example, for every \$1 White men earn, Bangladeshi women earn **49 cents**, Nepali women **51 cents**, and Burmese women **52 cents**. Id.

²⁹ U.S. Government Accountability Office (GAO). (2022). Women in the Workforce: The Gender Pay Gap Is Greater for Certain Racial and Ethnic Groups and Varies by Education Level. GAO-23-106041. Dec. 15, 2022. <https://www.gao.gov/products/gao-23-106041>.

³⁰ National Partnership for Women & Families and Return to the Heart Foundation. (2023). Fact Sheet: Native American Women and the Wage Gap. November 2023. <https://nationalpartnership.org/wp-content/uploads/native-american-women-wage-gap.pdf>.

³¹ GAO. (2022).

³² Heather McCulloch. (2017). Closing the women’s wealth gap: What it is, why it matters, and what can be done about it. Closing the Women’s Wealth Gap. <https://womenswealthgap.org/wp-content/uploads/2017/06/Closing-the-Womens-Wealth-Gap-Report-Jan2017.pdf>.

³³ Id.

³⁴ Badgett, M. V. L., Choi, S. K., & Wilson, B. D. M. (2019). LGBT poverty in the United States: A study of differences between sexual orientation and gender identity groups. The Williams Institute. <https://williamsinstitute.law.ucla.edu/publications/lgbt-poverty-us/>.

³⁵ James, S. E., Herman, J. L., Rankin, S., Keisling, M., Mottet, L., & Anafi, M.

³⁶ Id.



As GBV is a systemic economic issue, state regulators must support survivors in obtaining long-term safety and financial freedom. In FreeFrom’s first-of-its-kind National Survivor Financial Security Policy Map and Scorecard, FreeFrom found that **only 1** state currently supports survivors’ financial security and **only 20** more are “taking steps” to do so,³⁷ meaning that there is a strong need for state regulators to implement policies that prioritize survivors’ financial security nationwide.

Despite the current lack of adequate support, survivors trust State Government. Accordingly, State Governments – including state regulators – must address GBV beyond conventional methods.

Given the financial devastation of GBV and economic abuse, state regulators must support survivors and their families in building the financial security necessary to heal, recover, and stay safe. Requiring registration of consumer reporting companies under the CCFPL is one crucial way to achieve this.

III. FREEFROM’S COMMENTS SUPPORTING REGISTRATION OF CONSUMER REPORTING COMPANIES UNDER THE CCFPL

Once again, FreeFrom appreciates the opportunity to respond to the CA DFPI’s invitation for comments on proposed rulemaking requiring registration and reporting of consumer-reporting providers. FreeFrom submits these comments to ensure any proposed rulemaking reflects the unique financial and safety needs of survivors and their families.

2. What acts or practices by consumer-reporting providers cause harm to consumers?

Consumers often face significant credit reporting issues and difficulties correcting them – which can severely limit their access to housing, employment, and everyday essentials. This has prompted legislative and regulatory actions at the federal and state level, including in California.

Survivors in and outside the State face unique challenges with consumer reporting systems due to the impacts of economic abuse. Harm-doers have unfettered access to their personal and financial information, making it difficult for survivors to protect their credit, often discovering damage only after it occurs. This leaves survivors, already burdened by the costs of harm, with debt they can’t afford to pay. Additionally, nearly **60%** of survivors lose their jobs due to the harm they’ve experienced³⁸ – further hindering their ability to rebuild and restore their credit.

This highlights the importance of consumer protection agencies, like the CA DFPI, in addressing these market issues and better protecting consumers, including survivors.

a. Harmful credit-reporting practices that impact survivors

³⁷ *The National Survivor Financial Security Policy Map And Scorecard*. FreeFrom, May 11, 2021. <https://mapandscorecard.freefrom.org>. Accessed February 25, 2026.

³⁸ Ridley, E., Rioux, J., Lim, K.C., Mason, D., Houghton, K.F., Luppi, F., & Melody, T. (2005). *Domestic Violence Survivors at Work: How Perpetrators Impact Employment*. Maine Department of Labor and Family Crisis Services. https://www1.maine.gov/labor/labor_stats/publications/dvreports/survivorstudy.pdf.

i. Inaccurate reporting

Multiple consumer regulatory and non-profit organizations³⁹ have identified report inaccuracies by credit-reporting companies, including the inclusion of outdated data; failure to update or discharge accounts; mismatches in personal or financial information; or failure to block or remove incorrect data. The CFPB⁴⁰ and the Federal Trade Commission (FTC)⁴¹ have both taken action against credit reporting and data broker companies for such violations, with consumer complaints – and related settlements – increasing significantly over the past decade.⁴² In 2024 alone, the CA DFPI opened nearly 700 CCFPL-related investigations, issuing over 200 public actions and collecting \$2.7 million in penalties, specifically targeting companies with harmful consumer data practices.⁴³

Such practices damage consumers’ credit scores, increase their borrowing costs, and hinder their access to housing, employment, and other essentials. For survivors, these consequences are often more severe due to the enduring economic impacts of harm, including limited savings or credit, which limit their ability to withstand financial disruptions. As survivors shared with us:

“I am still very overwhelmed by the debt my abuser/exhusband created and left me with. This journey is long because I am the sole provider for my children (their father will not pay child support). I have very little disposable income to pay debt collectors.” – Grantee of FreeFrom’s Safety Fund

“My attacker had access to my accounts and racked up debt and drained my accounts both with and without my knowledge. I will be paying off that debt for another 10 years.” – Grantee of FreeFrom’s Safety Fund

“My ex-husband left me with thousands of dollars in credit card debt in exchange for signing the divorce papers. I am living in a shady motel due to not being financially secure.” – Grantee of FreeFrom’s Safety Fund

Correcting consumer report errors is often time-consuming and complex, imposing additional barriers to long-term safety. These are especially evident when survivors attempt to block or remove coerced/fraudulent debts from their consumer reports. This process requires detailed follow-up and is often hampered by delayed notice, as many (**62%**) survivors only learn about

³⁹ National Consumer Law Center (NCLC). Credit Reporting & Data Fairness. Accessed February 23, 2026 at <https://www.nclc.org/issue/credit-reporting-and-data-fairness/>.

Public Citizen. Consumer and Worker Safeguards. Accessed February 25, 2026 at <https://www.citizen.org/topic/consumer-worker-safeguards/>.

⁴⁰ CFPB. (2022). CFPB Releases Report Detailing Consumer Complaint Response Deficiencies of the Big Three Credit Bureaus. <https://www.consumerfinance.gov/about-us/newsroom/cfpb-releases-report-detailing-consumer-complaint-response-deficiencies-of-the-big-three-credit-bureaus/>

⁴¹ Federal Trade Commission (FTC). Credit Reporting. Accessed February 23, 2026 at <https://www.ftc.gov/news-events/topics/consumer-finance/credit-reporting#:~:text=The%20Fair%20Credit%20Reporting%20Act,RealPage%2C%20Inc.%20>

⁴² CFPB. (2022). Consumer Response Annual Report: January 1 - December 31, 2021. https://files.consumerfinance.gov/f/documents/cfpb_2021-consumer-response-annual-report_2022-03.pdf

⁴³ Cooley, LLP. (2025). California DFPI Issues Annual Report Detailing Key Consumer Protection Accomplishments. JD Supra. <https://www.jdsupra.com/legalnews/california-dfpi-issues-annual-report-7288925/#:~:text=Enforcement%20and%20investigations.and%2010%20state%20attorneys%20general.>



these debts through contact with creditors or bill collectors⁴⁴, and by that time, may face consumer debt judgments leading to wage or benefit garnishments, bank account freezes, or other asset seizures – practices that can mirror economic abuse.⁴⁵

“The bank withdraw from my personal account to cover negative balance from joint account. That caused me to not be able to [avoid] the overdraft fee and not be able to have a bank account for 8 months.” – Grantee of FreeFrom’s Safety Fund

“My ex trafficker ran up my checking account so I’m default with a few banks” – Grantee of FreeFrom’s Safety Fund

This can be retraumatizing for survivors, heighten their financial vulnerability, and compel them to rely on expensive legal services, further straining their finances. It may also deepen some survivors’ dependence on a harm-doer, making it harder to get and stay safe.

These challenges are amplified for survivors experiencing multiple, intersecting systems of oppression which make these errors more likely, harder to identify, and more difficult to fix. Structural inequities – such as limited legal and financial resources, language and digital barriers, and caretaking constraints – mean inaccuracies often go unaddressed, leading to cascading financial consequences like damaged or lost credit.

This can exacerbate the financial impacts of harm, making it harder for survivors to meet their basic needs and ensure lasting safety for themselves and their families.

ii. Failing to investigate and resolve consumer report disputes

Companies often create hurdles to deter report disputes, delaying or ignoring investigations by not dedicating sufficient time or resources; refusing or disregarding consumer-provided information; or, demanding specific or excessive documentation. The CA DFPI has documented these practices⁴⁶, working with financial service providers to improve their consumer dispute processes, ensuring consumers can access relief.

Survivors are adversely affected by these actions, which make long-term safety harder to achieve. They force survivors to step away from work or other responsibilities to seek support, and increase their risks for further harm if discovered by a harm-doer. These challenges are even greater for survivors seeking relief for coerced/fraudulent debt, as they’re often required to “prove” these debts were incurred due to GBV-related harm.

⁴⁴ Adams AE, Littwin AK, & Javorka M. The Frequency, Nature, and Effects of Coerced Debt Among a National Sample of Women Seeking Help for Intimate Partner Violence. *Violence Against Women*. 2020 Sep;26(11):1324-1342. doi: 10.1177/1077801219841445. Epub 2019 Apr 22. PMID: 31007144.

⁴⁵ Bhattacharya, A., dorosh-walther, Mx. blair, Reid, B., Sussman, E., Kourousias, L., Garcia Bigelow, M., Menna, M., Correa, M., Cameo, M., Young, N., Wee, S., & Inzunza, T. *Reinvesting in Economic Justice, Equity, and Solidarity for Survivors in New York City: A Survivor-Centered Policy Platform & Recommendations for Coerced Debt, Housing, Public Benefits & Solidarity Economy*. (2022). New York City Anti-Violence Project, Safe Horizon, Center for Survivor Agency & Justice, Mixteca Organization, Inc., Urban Justice Center’s Domestic Violence Project, CAMBA Legal Services, Inc., Violence Intervention Program, Her Justice, Urban Resource Institute. Accessed September 23, 2024, from https://avp.org/wp-content/uploads/2022/10/NYC-Survivor-Economic-Equity-Platform_FINAL-3.pdf.

⁴⁶ Jackson, L. (2024). California DFPI Settles with Financial Services Company Over Customer Service Complaints. Goodwin Protector, LLP. <https://www.consumerfinanceinsights.com/2024/02/28/california-dfpi-settles-with-financial-services-company-over-customer-service-complaints/>

This can be particularly difficult without documentation like police reports which consumer reporting companies typically require for relief, despite it being one of the least safe or accessible forms of “proof” for survivors. A 2022 survey by the National Domestic Violence Hotline revealed that **39%** of survivors felt less safe after contacting police⁴⁷, while a 2021 FreeFrom report found that **68%** of survivors did not feel safe obtaining or sharing a police report.⁴⁸

“My abuser gained access to my bank account details and personal information including social security card after breaking into my fireproof safe. Police refused to take a report because they were not witness to the incident. Their criteria was confusing. This abuser was known to use shared credit cards that I was the primary payor on to buy things for his property after breaking up with me.” – Grantee of FreeFrom’s Safety Fund

“The police did not help me the first time even though there was a lot of evidence suggesting that I was hurt. They locked me up because I was afraid to speak when they questioned me in front of my abuser and labeled me the aggressor. I am now fighting a family and criminal case. It is hard to trust anyone.” – Grantee of FreeFrom’s Safety Fund

“I have called in the past and the police officer I spoke to ridiculed me and said that maybe I provoked [the harm-doer] because that's what girls do. He made me feel bad for calling so I told myself, I will probably never call again after how I was treated.” – Grantee of FreeFrom’s Safety Fund

This is compounded by the lack of training that financial institutions – including consumer-reporting companies – have on GBV and economic abuse. Survivors often have to repeat their stories, receiving little or inconsistent information, and face severe stigma about their experiences. As a result, survivors must navigate systems that are not only ineffective but extremely harmful, rooted in oppressive structures that create and exacerbate GBV.

“Bank did not believe me that my harm do-er used my debit and credit cards” – Grantee of FreeFrom’s Safety Fund

“I had to explain my situation over and over again to bank staff because the harm-doer kept accessing my bank account. They made things so complicated and they still are despite me changing all my bank info and now only having one credit card attached to that bank.” – Grantee of FreeFrom’s Safety Fund

“Not being allowed access to my account due to former partner convincing bank that I was unstable.” – Grantee of FreeFrom’s Safety Fund

⁴⁷ Leigh Goodmark. (2022). Law Enforcement Experience Report: Domestic Violence Survivors’ Survey Regarding Interaction with Law Enforcement. National Domestic Violence Hotline (NDVH). https://www.thehotline.org/wp-content/uploads/media/2022/09/2209-Hotline-LES_FINAL.pdf. This report shares data gathered by NDVH from a 2021 survey of approximately **1,500 survivors** from across the U.S.

⁴⁸ FreeFrom. (2021).



“When I talked to people in the credit card department of the bank, their attitude and language made me sad” – Grantee of FreeFrom’s Safety Fund

“My abuser over drafted accounts and maxed out my credit card and the banks would not help lower fee or work with me in the unauthorized charges” – Grantee of FreeFrom’s Safety Fund

Once more, survivors subjected to systemic harm are disproportionately affected. Consumer regulatory agencies have repeatedly found that BIPOC consumers, including BIPOC survivors, encounter greater disputes on their credit reports and greater difficulty resolving them.⁴⁹ Consumers with disabilities, including survivors with disabilities, also experience significant challenges accessing support from financial institutions.⁵⁰

Onerous dispute practices, including those requiring police reports, exacerbate these experiences and hinder survivors’ access to relief. They underscore the need for more supportive, adaptive processes that better serve survivors and, more broadly, disentangling financial services from the criminal-legal system, which exceedingly targets and punishes survivors and other people experiencing systemic harm.

iii. Data security and privacy breaches

Numerous data and privacy breaches at consumer reporting companies have compromised the personal and financial information of millions of consumers, putting them at financial risk. Although California has expanded legal remedies for such breaches⁵¹, survivors still face significant safety risks.

Consumer reporting companies amass extensive profiles that include names, addresses, Social Security or Individual Tax Identification Numbers, and credit histories – information that may be used by a harm-doer to identify or further harm survivors. These actions disproportionately impact survivors experiencing systemic harm, who face steeper obstacles navigating legal and financial systems that often fail to support or protect them.

The CA DFPI has acknowledged this and the importance of safeguarding survivors’ data privacy and consumer integrity.⁵²

iv. Unfair and deceptive practices

Consumers reporting companies also employ unfair and deceptive practices, including accepting data from furnishers known to provide inaccurate or unverifiable information; failing to forward disputes and supporting documents; mislabeling disputes as frivolous or irrelevant; deleting accounts instead of correcting them; or otherwise diminishing consumers’ dispute rights. While

⁴⁹ National Association of Attorneys General (NAAG). (2022). Communities of Color, Fraud, and Consumer Protection Agencies. <https://www.naag.org/attorney-general-journal/communities-of-color-fraud-and-consumer-protection-agencies/>.

⁵⁰ National Disability Institute (NDI). (2018). Access to Credit for Adults with Disabilities: Information Brief. <https://www.nationaldisabilityinstitute.org/wp-content/uploads/2018/12/access-credit-brief.pdf>.

⁵¹ CA DFPI. Fraud Protection. Accessed February 23, 2026 at <https://dfpi.ca.gov/consumers/fraud-protection/>.

⁵² CA DFPI. (2025). Protecting the Financial Rights of Domestic Violence Survivors: Guidance for Financial Institutions. <https://dfpi.ca.gov/consumers/protecting-the-financial-rights-of-domestic-violence-survivors/guidance-for-financial-institutions/>.



the CA DFPI continues to address these practices,⁵³ issues remain that prevent consumers from accessing relief and limit available supports, causing serious financial harm.

For survivors, this can further destabilize their finances. In the context of coerced/fraudulent debt, these actions allow these accounts to persist on survivors' consumer reports, limiting their access to credit and other financial services needed for long-term safety. Survivors subjected to the highest levels of systemic harm are more severely impacted, as they often deal with more costly and difficult-to-repay debt, and face greater barriers to recovery from financial, legal, and service systems.⁵⁴

This highlights the need for stronger protections to ensure survivors can financially recover, rebuild, and thrive.

b. Need for regulatory action

These harmful consumer practices demand further rulemaking. The CA DFPI should take decisive action to better support consumers – including survivors – throughout the State by requiring registration and reporting of consumer-reporting companies.

3. What concerns do consumer-reporting providers present to consumers or the financial marketplace that warrant prioritizing the supervision of this industry over others?

Credit scores are crucial for accessing safe, affordable credit, and without proper guidance, survivors remain financially vulnerable. Nearly one in two survivors (**48%**)⁵⁵ would seek support from consumer credit and reporting companies if they knew it was available – which the CA DFPI itself has acknowledged and worked to advance. This proposed rulemaking builds on those broader efforts to ensure sustained, robust support for survivors, and we urge swift action to move it forward.

5. To the extent the CCFPL covers other participants in the consumer-data industry, such as data brokers, aggregators, or other intermediaries, what concerns do these providers present to consumers or the financial marketplace?

Given that these companies collect, analyze, and sell vast amounts of consumer information, often without consumers' knowledge and consent, it is imperative that the CA DFPI take necessary action to regulate them. Without proper oversight, this information can be – and has been – used against survivors to cause further harm. By supervising these financial entities, the CA DFPI can ensure better market transparency, accountability, and stability, crucial for survivors' long-term safety.

6. How might rulemaking by the Department address the consumer and market concerns identified above?

⁵³ CA DFPI. (2023). https://dfpi.ca.gov/press_release/dfpi-continues-yearlong-effort-targeting-unlawful-deceptive-debt-collectors-with-four-new-actions/.

⁵⁴ Adams, A.E., Littwin, A. Understanding Coerced Debt, available at https://csaj.org/wpcontent/uploads/2022/10/CSAJ-CCD_Part-2_Understanding-Coerced-Debt.pdf. Accessed September 23, 2024.

⁵⁵ FreeFrom. (2021).



Rulemaking is critical to addressing these concerns by strengthening oversight of consumer-reporting companies and other financial entities. Under the CCFPL, financial service providers must disclose key business, legal, and financial histories, increasing transparency around current practices and potential consumer risks. This ensures the CA DFPI can more effectively support consumers – including survivors – through informed policies and targeted actions. Accordingly, we support the Departments’ proposed rulemaking requiring registration and reporting of consumer-reporting companies.

IV. CONCLUSION

Financial insecurity is a top obstacle to survivors’ safety. We cannot disrupt the cycle of GBV in the U.S. unless we prioritize and protect survivors’ financial security – and that includes survivors’ access to financial support and relief. It is imperative that state regulators consider the unique financial and safety needs of survivors and families, and safeguard their interests.

As a team of survivors, FreeFrom encourages the CA DFPI to work with us to ensure *every* survivor has access to the financial security necessary to support individual, intergenerational, and collective healing.

If you have any questions or would like to discuss FreeFrom’s comments further, please contact FreeFrom’s Systems Change Team at [REDACTED].

Thank you very much for your consideration.

Sincerely,

FreeFrom