From: Irene Jasper
To: DFPI Regulations
Subject: PRO 05-21

**Date:** Tuesday, November 30, 2021 4:37:17 AM

## Good morning,

Our school lends money directly to students to help them pay for some of their tuition and education-related expenses. There are three different parties involved in the collection of these receivables – (1) Our billing servicer, Heartland-ECSI. They handle all of our billing, and due diligence activities (30,60,90, and 120 day letters and calls) (2) Our office, which sends an email to the student offering assistance, once their account is 4 months past due. (3) Third-party collection agencies - Once the account five months past due, it is turned over to a collection agency.

Under California's new law requiring debt collectors to be licensed, which of the three parties involved in the management of our receivables is required to be licensed?

I appreciate your time, and any guidance you can provide.

Regards, Irene

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