



July 25, 2022

Department of Financial Protection and Innovation  
Legal Division  
Attn: Sandra Navarro, Legal Assistant  
2101 Arena Blvd.  
Sacramento, CA 95834

Via Email: [regulations@dfpi.ca.gov](mailto:regulations@dfpi.ca.gov)

**Re: PRO 05-21**

Dear Ms. Navarro:

Thank you for the opportunity to comment on the Department of Financial Protection and Innovation's draft text for a proposed second rulemaking under the Debt Collection Licensing Act (PRO 05 21).

The California Hospital Association (CHA), representing more than 400 hospitals and health systems in California, appreciates the clarification included in proposed subdivision (e) of Section 1850.1 namely, that hospitals and other health care providers are not engaged in the business of debt collection for purposes of licensure under the Debt Collection Licensing Act if the only debt collected is on their own behalf and is payment for medical or other services/products provided. We believe this reflects the intent of the authorizing legislation and are pleased to see it incorporated into the regulations.

Please do not hesitate to contact me at (916) 834 7611 if you have any questions.

Sincerely,

A black rectangular redaction box covering the signature of Lois Richardson.

Lois Richardson  
Vice President & Legal Counsel