

CSBS Support Letter for MD HB 250.pdf

Uploaded by: Amy Hennen

Position: FAV



January 18, 2024

Delegate C.T. Wilson, Chair
House Economic Matters Committee
Room 231
House Office Building
Annapolis, Maryland 21401

Dear Chair Wilson:

The Conference of State Bank Supervisors (“CSBS”)¹ appreciates the opportunity to comment on Maryland House Bill 250. The bill will authorize the Commissioner of Financial Regulation to examine third-party service providers (“TSPs”) that perform critical activities on behalf of a Maryland licensed or chartered financial entity. This legislation will enhance the Commissioner’s ability to promote consumer protection and the safety and soundness of regulated entities. Currently, 37 states have similar authority under their respective state laws.

Financial institutions have long partnered with third-party service providers, which can be affiliates, subsidiaries, or contracted vendors, to outsource a range of critical business services and help leverage technological innovations. TSPs are expected to comply with the same applicable laws and regulations as the financial institutions using their services.

While financial institution and vendor relationships are common, they can expose financial institutions and their customers to unique and serious risks, particularly cybersecurity or business continuity risks. Recent cyber incidents at technology vendors underscore the serious vulnerabilities that can exist at TSPs. Ensuring effective regulatory oversight of financial institutions’ partners and vendors is important to mitigating these risks.

We appreciate your efforts to bring this bill to the House Economic Matters Committee for its consideration and look forward to its enactment.

Sincerely,

Karen K. Lawson
Executive Vice President, Policy & Supervision

cc: Antonio P. Salazar, Commissioner of Financial Regulation

¹ CSBS is the nationwide organization of state banking and financial regulators from all 50 states, American Samoa, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands. CSBS supports the state banking agencies by serving as a forum for policy and supervisory process development, facilitating regulatory coordination on a state-to-state and state-to-federal basis, and providing training, educational programs, and exam resources.

Senate XO HB250 Letter of Support.pdf

Uploaded by: Amy Hennen

Position: FAV

March 20, 2024

Senate Finance Committee

Chair: Senator Beidle

House Bill 250 – Third-Party Service Providers - Examinations

Re: Letter of Support

As Maryland’s Consumer Financial Protection Agency, the Office of Financial Regulation (OFR) requests a favorable report on HB250 which provides OFR with enhanced authority to ensure that regulated financial service providers are operating in a safe and sound manner for the protection of Marylanders and the stability of the financial industry.

In keeping with the increasingly digital nature of the financial services sector and financial products generally, financial institutions licensed or chartered by OFR all, to a greater or lesser degree, rely on third-party service providers (“TSPs”) for a range of services. Some of these services are for the operation of their core services and others are for important, but not core, functions. While the use of TSPs provides financial service providers with many benefits, it also multiplies the risks the financial service providers, and their products pose to consumers and the financial system. OFR currently lacks the authority to examine such TSPs. This lack of authority limits the OFR’s ability to fully examine and investigate many regulated entities or join with, or receive information from, other state and federal regulators who may be examining or investigating critical TSPs. In turn, this opacity may conceal the risks TSPs pose to institutions operating in Maryland and their customers. Hence, OFR, through HB250, seeks to expand its examination authority to include TSPs.

OFR underwent a reaccreditation examination of its bank examination function in 2022. That examination report noted OFR’s lack of authority to examine bank TSPs and recommended that “the Agency acquire the authority to examine TSPs.”

Regulators in 37 states currently have the ability to examine bank TSPs. Having the ability to examine TSPs of such depository institutions as well as persons offering financial services in Maryland provides OFR with the ability to gain an insight into the operations of critical service providers to financial services companies and enhances OFR’s ability to ensure the safety, soundness, and legal compliance of companies providing financial services to Maryland residents. It also allows OFR to receive the examinations of such TSPs conducted by federal and other state regulators.

The legislation is modeled after banking and credit union TSP examination authority granted to regulators in Texas and Michigan. Those states have significant experience in examining TSPs and their legal framework provided a good model for Maryland to follow.



OFFICE OF FINANCIAL REGULATION
1100 NORTH EUTAW STREET; SUITE 611
BALTIMORE, MARYLAND 21201
ANTONIO P. SALAZAR, COMMISSIONER

OFR seeks the authority to conduct TSP examinations to (i) enhance the effectiveness of OFR's examination programs; (ii) allow OFR to participate in, or receive information from, TSP examinations by other regulators; and (iii) better assess the safety and soundness of Maryland financial service providers and protect their customers.

Because the costs of the TSP exams are to be borne by the third parties that are examined, OFR anticipates no fiscal impact from this bill. After HB250 was introduced in the House, OFR received feedback from some banks and, later, large third-party service providers, and it worked to incorporate language into the bill so that all parties are satisfied with the iteration of the bill that is before the Committee. Those changes are reflected in the additional sponsor amendments.

With that, we urge a favorable Committee Report.

For Sen. Finance HB250 Third Party Service Provide

Uploaded by: Marceline White

Position: FAV



Testimony to the Senate Finance Committee
HB250: Financial Institutions-Third Party Service Providers-Examinations
Position: Favorable

March 20, 2023

The Honorable Pam Beidle, Chair
Senate Finance Committee
3 East, Miller Senate Office building
Annapolis, MD 21401
cc: Members, Senate Finance Committee

Chair Beidle and Members of the Committee:

Economic Action Maryland (formerly the Maryland Consumer Rights Coalition) is a statewide coalition of individuals and organizations that advances economic rights and equity for Maryland families through research, education, direct service, and advocacy. Our 12,500 supporters include consumer advocates, practitioners, and low-income and working families throughout Maryland.

We are writing today in support of HB250. HB250 enables the Commissioner of Financial Regulation to examine third-party service providers as to services and activities performed on behalf of a regulated entity as if the regulated entity was providing services or activities. As more and more firms contract or subcontract services and work with global and remote providers, it makes sense to ensure that third-party providers would be subject to examinations for regulated financial services providers and that the Commissioner should have the authority to conduct examinations of third party providers as needed.

For these reasons, we support HB 250 and urge a favorable report.

Best,

Marceline White
Executive Director

For these reasons we support HB246 and urge a favorable report.

Best,

Marceline White
Executive Director

HB250_DOL_Amendments

Uploaded by: Andrew Fulginiti

Position: FWA

HB0250/243425/1

PATC

BY: Chair, Finance Committee (By Request – Departmental –
Labor)

(To be offered in the Finance Committee)

AMENDMENTS TO HOUSE BILL 250

(Third Reading File Bill)

AMENDMENT NO. 1

On page 3, in line 1, strike “A” and substitute “:

(I) A”; and

in line 5, before the period, insert “;OR

(II) ANY PERSON THAT CONTROLS, OR IS UNDER COMMON CONTROL WITH, AN ENTITY LICENSED BY THE COMMISSIONER UNLESS SUCH PERSON PERFORMS FOR THE LICENSED ENTITY ANY OF THE ACTIVITIES DESCRIBED IN PARAGRAPH (2) OF THIS SUBSECTION”.

AMENDMENT NO. 2

On page 3, after line 10, insert:

“(B) TO THE EXTENT PERMITTED BY LAW, REGULATION, OR ANY OTHER AGREEMENT TO WHICH THE OFFICE OF FINANCIAL REGULATION IS A PARTY, THE COMMISSIONER SHALL NOTIFY A PERSON LICENSED BY THE COMMISSIONER OF ANY EXAMINATION INITIATED BY THE COMMISSIONER OF ANY THIRD-PARTY SERVICE PROVIDER WHO PERFORMS ACTIVITIES RELATING TO FINANCIAL SERVICES ON BEHALF OF THE LICENSED PERSON.”;

in lines 11, 14, 22, and 27, strike “(B)”, “(C)”, “(D)”, and “(E)”, respectively, and substitute “(C)”, “(E)”, “(F)”, and “(G)”, respectively;

after line 13, insert:

“(D) AFTER COMMENCEMENT OF AN EXAMINATION OF A PERSON LICENSED BY THE COMMISSIONER OR ANY THIRD-PARTY SERVICE PROVIDER WHO PERFORMS ACTIVITIES RELATING TO FINANCIAL SERVICES ON BEHALF OF A PERSON LICENSED BY THE COMMISSIONER:

(1) THE COMMISSIONER MAY REQUEST INFORMATION FROM THE THIRD-PARTY SERVICE PROVIDER TO THE LICENSED PERSON; AND

(2) IF THE LICENSED PERSON HAS ACCESS TO THE INFORMATION, THE LICENSED PERSON MAY PROVIDE THE INFORMATION TO THE COMMISSIONER:

(I) WITH THE CONSENT OF THE COMMISSIONER; OR

(II) IF THE THIRD-PARTY SERVICE PROVIDER FAILS TO PROVIDE THE INFORMATION.”; and

in line 32, after “OR”, insert “, AS APPROPRIATE,”.

On page 4, in lines 1 and 13, strike “(F)” and “(G)”, respectively, and substitute “(H)” and “(I)”, respectively; and after line 17, insert:

“(J) THE EXAMINATION POWERS OF THE COMMISSIONER AUTHORIZED UNDER THIS SECTION ARE IN ADDITION TO ANY EXAMINATION POWERS OF THE COMMISSIONER AUTHORIZED UNDER ANY OTHER PROVISION OF LAW.”.

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HOUSE BILL 250

(PRE-FILED)

4lr0235
CF 4lr0236

By: Chair, Economic Matters Committee (By Request - Departmental - Labor)

Requested: September 15, 2023

Introduced and read first time: January 10, 2024

Assigned to: Economic Matters

Committee Report: Favorable with amendments

House action: Adopted

Read second time: February 13, 2024

CHAPTER _____

1 AN ACT concerning

2 **Financial Institutions - Third-Party Service Providers - Examinations**

3 FOR the purpose of authorizing the Commissioner of Financial Regulation to examine a

4 third-party service provider as to services and activities performed on behalf of an

5 entity licensed or chartered by the Office of Financial Regulation; and generally

6 relating to the Commissioner of Financial Regulation and the power to examine

7 third-party service providers.

8 BY repealing and reenacting, without amendments,

9 Article - Financial Institutions

10 Section 1-101(a)

11 Annotated Code of Maryland

12 (2020 Replacement Volume and 2023 Supplement)

13 BY adding to

14 Article - Financial Institutions

15 Section 1-101(w) and (x) and 2-122

16 Annotated Code of Maryland

17 (2020 Replacement Volume and 2023 Supplement)

18 SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND,

19 That the Laws of Maryland read as follows:

20 **Article - Financial Institutions**

2

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1 1-101.

2 (a) In this article, unless the context clearly requires otherwise, the following
3 words have the meanings indicated.

4 (w) "REGULATED ENTITY" MEANS A PERSON WHO IS LICENSED OR
5 CHARTERED BY THE OFFICE OF FINANCIAL REGULATION.

6 (x) (1) "THIRD-PARTY SERVICE PROVIDER" MEANS A PERSON WHO
7 PERFORMS ACTIVITIES RELATING TO FINANCIAL SERVICES ON BEHALF OF A
8 REGULATED ENTITY FOR THAT REGULATED ENTITY'S CUSTOMERS.

9 (2) "THIRD-PARTY SERVICE PROVIDER" INCLUDES A PERSON WHO
10 PROVIDES:

11 (i) DATA PROCESSING SERVICES;

12 (ii) ACTIVITIES THAT SUPPORT FINANCIAL SERVICES,
13 INCLUDING:

14 1. LENDING;

15 2. FUNDS TRANSFER;

16 3. FIDUCIARY ACTIVITIES;

17 4. TRADING ACTIVITIES; AND

18 5. DEPOSIT TAKING;

19 (iii) INTERNET-RELATED SERVICES, INCLUDING:

20 1. WEB SERVICES AND ELECTRONIC BILL PAYMENTS;

21 2. MOBILE APPLICATIONS;

22 3. SYSTEM AND SOFTWARE DEVELOPMENT AND
23 MAINTENANCE; AND

24 4. SECURITY MONITORING; OR

25 (iv) ANY OTHER SIMILAR ACTIVITY THE COMMISSIONER
26 DESIGNATES BY REGULATION AS RELATED TO FINANCIAL SERVICES.

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(3) "THIRD-PARTY SERVICE PROVIDER" DOES NOT INCLUDE ~~A~~ :

(I) A

PROVIDER OF AN INTERACTIVE COMPUTER SERVICE OR A GENERAL AUDIENCE INTERNET OR COMMUNICATIONS PLATFORM, EXCEPT TO THE EXTENT THAT THE SERVICE OR PLATFORM IS SPECIALLY DESIGNED OR ADAPTED FOR FINANCIAL SERVICES AND ACTIVITIES RELATED TO FINANCIAL SERVICES ; OR

(II) ANY PERSON THAT CONTROLS, OR IS UNDER COMMON CONTROL WITH, AN ENTITY LICENSED BY THE COMMISSIONER UNLESS SUCH PERSON PERFORMS FOR THE LICENSED ENTITY ANY OF THE ACTIVITIES DESCRIBED IN PARAGRAPH (2) OF THIS SUBSECTION.

2-122.

(A) THE COMMISSIONER MAY EXAMINE A THIRD-PARTY SERVICE PROVIDER AS TO SERVICES AND ACTIVITIES PERFORMED ON BEHALF OF THE REGULATED ENTITY TO THE SAME EXTENT AS IF THE SERVICE OR ACTIVITY WAS PERFORMED BY THE REGULATED ENTITY.

(B) TO THE EXTENT PERMITTED BY LAW, REGULATION, OR ANY OTHER AGREEMENT TO WHICH THE OFFICE OF FINANCIAL REGULATION IS A PARTY, THE COMMISSIONER SHALL NOTIFY A PERSON LICENSED BY THE COMMISSIONER OF ANY EXAMINATION INITIATED BY THE COMMISSIONER OF ANY THIRD-PARTY SERVICE PROVIDER WHO PERFORMS ACTIVITIES RELATING TO FINANCIAL SERVICES ON BEHALF OF THE LICENSED PERSON.

~~(B)~~ (C) THE POWER OF THE COMMISSIONER TO EXAMINE A THIRD-PARTY SERVICE PROVIDER UNDER THIS SECTION IS NOT LIMITED TO SERVICES AND ACTIVITIES CONDUCTED ON THE PREMISES OF A REGULATED ENTITY.

(D) AFTER COMMENCEMENT OF AN EXAMINATION OF A PERSON LICENSED BY THE COMMISSIONER OR ANY THIRD-PARTY SERVICE PROVIDER WHO PERFORMS ACTIVITIES RELATING TO FINANCIAL SERVICES ON BEHALF OF A PERSON LICENSED BY THE COMMISSIONER:

(1) THE COMMISSIONER MAY REQUEST INFORMATION FROM THE THIRD-PARTY SERVICE PROVIDER TO THE LICENSED PERSON; AND

(2) IF THE LICENSED PERSON HAS ACCESS TO THE INFORMATION, THE LICENSED PERSON MAY PROVIDE THE INFORMATION TO THE COMMISSIONER:

(I) WITH THE CONSENT OF THE COMMISSIONER; OR

(II) IF THE THIRD-PARTY SERVICE PROVIDER FAILS TO PROVIDE THE INFORMATION.

~~(E)~~ (E) THE COMMISSIONER MAY COLLECT A FEE IN CONNECTION WITH EACH EXAMINATION TO COVER THE COST OF THE EXAMINATION FROM:

(1) THE EXAMINED THIRD-PARTY SERVICE PROVIDER; OR

(2) ~~THE~~ IF THE EXAMINED THIRD-PARTY SERVICE PROVIDER FAILS TO COVER THE COST OF THE EXAMINATION WITHIN 60 DAYS AFTER THE DATE THE COMMISSIONER SENDS AN INVOICE FOR THE EXAMINATION TO THE THIRD-PARTY SERVICE PROVIDER, THE REGULATED ENTITY THAT CONTRACTS WITH THE THIRD-PARTY SERVICE PROVIDER.

~~(F)~~ (F) THE COMMISSIONER MAY ACCEPT THE RESULTS OF AN EXAMINATION OF A FEDERAL SUPERVISORY AGENCY OR RESPONSIBLE SUPERVISORY AGENCY OF

24 ANOTHER STATE AS THE RESULTS OF AN EXAMINATION BY THE COMMISSIONER
25 UNDER THIS SECTION ~~IF THE EXAMINATION HAS BEEN CONDUCTED WITHIN THE~~
26 ~~PRECEDING 24 MONTHS.~~

27 ~~(E)~~ (G) THE COMMISSIONER MAY EXAMINE:

28 (1) ALL BOOKS, ACCOUNTS, AND RECORDS OF A REGULATED ENTITY
29 OR A THIRD-PARTY SERVICE PROVIDER AS THE COMMISSIONER DETERMINES
30 NECESSARY TO CONDUCT A COMPLETE EXAMINATION; AND

31 (2) ANY OFFICER, DIRECTOR, OR EMPLOYEE OF THE REGULATED
32 ENTITY OR, AS APPROPRIATE, THE THIRD-PARTY SERVICE PROVIDER, UNDER OATH, WHO MAY
33 PROVIDE INFORMATION ON BEHALF OF THE REGULATED ENTITY OR THE
34 THIRD-PARTY SERVICE PROVIDER.

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1 ~~(F)~~ (H) (1) THE COMMISSIONER IS AUTHORIZED TO TAKE AN ENFORCEMENT
2 ACTION AGAINST ANY THIRD-PARTY SERVICE PROVIDER WHO:

3 (I) REFUSES TO SUBMIT TO AN EXAMINATION;

4 (II) REFUSES TO PAY ANY ASSESSED FEE FOR THE COST OF THE
5 EXAMINATION; OR

6 (III) ENGAGES IN ACTIVITIES THAT THE COMMISSIONER DEEMS
7 UNSAFE OR UNSOUND.

8 (2) THE COMMISSIONER MAY ADVISE ANY REGULATED ENTITY THAT
9 USES THE SERVICES OF A THIRD-PARTY SERVICE PROVIDER WHO REFUSES TO
10 SUBMIT TO EXAMINATION OR ENGAGES IN UNSAFE OR UNSOUND ACTIVITIES THAT
11 THE CONTINUED USE OF THE THIRD-PARTY SERVICE BY THE REGULATED ENTITY
12 MAY CONSTITUTE UNSAFE OR UNSOUND ACTIVITY.

13 ~~(G)~~ (I) THE COMMISSIONER, AND ANY EMPLOYEE OF THE COMMISSIONER'S
14 OFFICE, SHALL HOLD AS CONFIDENTIAL, AS PROVIDED IN §§ 2-117 AND 2-117.1 OF
15 THIS SUBTITLE, ANY INFORMATION OBTAINED OR GENERATED IN THE COURSE OF
16 EXERCISING THE COMMISSIONER'S AUTHORITY TO EXAMINE THIRD-PARTY
17 SERVICE PROVIDERS.

(J) THE EXAMINATION POWERS OF THE COMMISSIONER AUTHORIZED
UNDER THIS SECTION ARE IN ADDITION TO ANY EXAMINATION POWERS OF THE
COMMISSIONER AUTHORIZED UNDER ANY OTHER PROVISION OF LAW.

18 SECTION 2. AND BE IT FURTHER ENACTED, That this Act shall take effect
19 October 1, 2024.

HB250_RMAi_UNF

Uploaded by: David Reid

Position: UNF



Date: March 20, 2024

To: Maryland Senate Finance Committee Members

From: Receivables Management Association International (RMAI)

Opposition to HB 250 - Financial Institutions - Third-Party Service Providers - Examinations

Collection Agencies Do Not Provide Consumers with Financial Products or Services

As justification for encompassing collection agencies within the scope of HB250, the Office of Financial Regulation (OFR) contends that, “38 states have the authority to examine third-party service providers for banks and credit unions.”¹ The OFR’s statement, however, overlooks an incredibly relevant and dispositive point: collection agencies are not banks nor credit unions and, as such, these states do not extend such authority over collection agencies.² Accordingly, not only is the OFR’s statement not supportive of its position, it is supportive of leaving collection agencies out of its scope.

Nothing above calls into question the scope of OFR’s oversight in connection with the safety and soundness of depository and lending institutions. The simple point, however, is that collection agencies are not banks, non-bank depository institutions or lending institutions and they do not provide any financial products or services to consumers. Instead, collection agencies are service providers to creditors, including banks, non-bank creditors and credit unions. The concerns surrounding a bank, non-bank or credit union off-loading the “processing [of] their lending and deposit taking activities” is simply not present when regulating collection agencies.³ Accordingly, HB250 should not be extended to cover collection agencies.

HB 250 Has a Material and Disproportionate Impact on Small Businesses; Nearly All Collection Agencies are Very Small Businesses

- The Majority of Maryland Collection Agencies are “Microbusinesses.”
 - There are 48 Maryland-based collection agencies. Of those 48, 25 employ 5 or less people, meaning the majority of Maryland based collection agencies could be considered as “microenterprises”.⁴

| | | | | |
|----------|-------|---------------------|------------------|----|
| Maryland | 56144 | Collection Agencies | 01: Total | 48 |
| Maryland | 56144 | Collection Agencies | 02: <5 employees | 25 |

¹ Department of Legislative Services, Maryland General Assembly, 2024 Session, *Fiscal and Policy Note*, First Reader, House Bill 250, (Jan. 19, 2024).

² See, e.g. 38 Ill. Adm. Code 385.20; Ga. Comp. R. & Regs. r. 80-1-2-.05 and N.D. Cent. Code, § 6-01-09

³ See footnote 2.

⁴ A microenterprise or microbusiness is commonly identified as a business employing nine (9) or less people. U.S. Small Business Administration, *Small Business Facts, The Role of Microbusiness Employers In The Economy*, Office of Advocacy (Aug. 2017) available at <https://advocacy.sba.gov/wp-content/uploads/2019/06/508FINALAug17Microbusiness.pdf>, archived at <https://perma.cc/CB4Q-GWEM>

| | | | | |
|----------|-------|---------------------|---------------------|----|
| Maryland | 56144 | Collection Agencies | 03: 5-9 employees | 7 |
| Maryland | 56144 | Collection Agencies | 04: 10-19 employees | 8 |
| Maryland | 56144 | Collection Agencies | 05: <20 employees | 40 |
| Maryland | 56144 | Collection Agencies | 06: 20-99 employees | 5 |
| Maryland | 56144 | Collection Agencies | 08: <500 employees | 46 |

United States Census Bureau, 2021 SUSB Annual Data Tables by Establishment Industry (Dec. 2023)
<https://www.census.gov/data/tables/2021/econ/susb/2021-susb-annual.html>, archived at
<https://perma.cc/QYF3-ERT3>

- Nationally, nearly 97% of Collection Agencies are Small Businesses
 - Of 2,748 collection agencies, nearly 76% employed 20 or less persons and nearly 97% employed less than 500 persons.

| | | | | |
|---------------|-------|---------------------|-----------------------|-------|
| United States | 56144 | Collection Agencies | 01: Total | 2,748 |
| United States | 56144 | Collection Agencies | 02: <5 employees | 1,221 |
| United States | 56144 | Collection Agencies | 03: 5-9 employees | 468 |
| United States | 56144 | Collection Agencies | 04: 10-19 employees | 396 |
| United States | 56144 | Collection Agencies | 05: <20 employees | 2,085 |
| United States | 56144 | Collection Agencies | 06: 20-99 employees | 452 |
| United States | 56144 | Collection Agencies | 07: 100-499 employees | 126 |
| United States | 56144 | Collection Agencies | 08: <500 employees | 2,663 |
| United States | 56144 | Collection Agencies | 09: 500+ employees | 85 |

Id.

Our members tell us that if HB 250 applies to them, that engaging any third-party service providers would be extremely burdensome, and could lead to fewer third party relationships. This is true for two reasons. *First*, because third-party service providers will shift the costs for such audits to our members. *Second*, because the cost of such audits would have a material adverse impact on their financial well-

being. A lack of third-party service providers could affect the efficiency and compliance of collection agencies, a development that is in the best interest of no one.

Summary

Because collection agencies are not banks and do not provide consumer financial products or services and are generally microbusinesses, the following amendment should be made to HB 250:

“REGULATED ENTITY” MEANS A PERSON WHO IS LICENSED OR CHARTERED BY THE OFFICE OF FINANCIAL REGULATION, EXCEPT FOR BUSINESSES LICENSED PURSUANT TO TITLE 7, SUBTITLE 3, SECTION 7-301 OF THE MARYLAND CODE.

About the Receivables Management Association International – The Receivables Management Association International (RMAI) is a nonprofit trade association that represents the Receivables Management Industry. RMAI’s Receivables Management Certification Program and Code of Ethics protect consumers and businesses by setting the gold standard through uniform industry best practices. RMAI provides networking, education, and business development opportunities through events and communications. RMAI also maintains a highly effective grassroots advocacy program at the state and federal levels. Founded in 1997, RMAI is headquartered in Sacramento, California.