Fair Credit Reporting Act Regulatory Update—2025

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The Fair Credit Reporting Act (FCRA) landscape experienced significant changes during 2025 as regulatory initiatives, enforcement actions, and a change in administration reshaped the consumer reporting industry.

In their article, *Fair Credit Reporting Act Regulatory Update—2025*, Hudson Cook Partners Rebecca E. Kuehn, Megan C. Nicholls, and Jennifer L. Sarvadi examine key developments affecting consumer reporting agencies, furnishers, lenders, and other participants in the consumer reporting ecosystem.

The article reviews major regulatory initiatives, including the CFPB's Medical Debt Rule, the proposed Data Broker Rule, and the Bureau's efforts to address coerced debt through amendments to Regulation V. The authors also discuss CFPB guidance concerning employment-related consumer reports and the Bureau's subsequent withdrawal of much of its FCRA-related guidance and rulemaking initiatives.

In addition, the article analyzes several notable enforcement actions highlighting ongoing regulatory focus on credit reporting accuracy, dispute investigations, furnishing practices, and consumer protections.

Key Takeaways

• The CFPB's Medical Debt Rule was finalized and subsequently vacated by a federal court.
• The CFPB withdrew its proposed Data Broker Rule after receiving significant industry feedback.
• The Bureau sought public comment on potential treatment of coerced debt as a form of identity theft under the FCRA.
• Much of the CFPB's FCRA guidance issued during the prior administration was withdrawn in 2025.
• Enforcement actions continued to focus on furnishing accuracy, dispute investigations, and consumer reporting agency compliance obligations.

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