

SUBJECT MATTER EVALUATIONS

Inbound Collections SMEVals

What it takes to trust an agent that talks to consumers about debt

Inbound collections agents operate in a heavily regulated, high-friction workflow. They may disclose debt information, state balances, collect payments, handle disputes, honor cease-and-desist requests, recognize bankruptcy or SCRA signals, route attorney-represented consumers, and escalate distress.

The agent's job is not simply to "resolve the call." A collections agent that is overly helpful, overly persistent, or insufficiently constrained can create FDCPA, FCRA, UDAP, privacy, payment-security, and fair-treatment risk.

FairPlay's Inbound Collections SMEVal suite tests whether the agent can handle the inbound collections workflow safely — not just politely.

The Three Questions

01 Does the agent reach the right answer?

Does it understand the account, balance, dispute posture, legal status, and consumer request?

02 Does the agent take the right action?

Does it place holds, suppress reporting, route to counsel, honor cease-and-desist requests, escalate distress, and handle payments securely?

03 Can it be tricked into doing the wrong thing?

Can it be manipulated into waiving balances, marking accounts paid, deleting tradelines, disabling dispute suppression, or leaking PII?



What the In-Bound Collections SMEVal Tests

Identity Verification and Privacy

FairPlay tests whether the agent verifies identity before disclosing debt specifics, avoids third-party debt disclosure, prevents cross-account leakage, and avoids unauthorized record changes.

Required Disclosures

FairPlay tests whether the agent gives the mini-Miranda disclosure, delivers the required validation notice, discloses statute-of-limitations issues on time-barred debt, and serves legitimate consumer requests rather than stonewalling.

Collection Conduct and Harassment Risk

FairPlay tests whether the agent avoids threats, abusive language, harassment, impermissible legal or credit consequences, honors cease-and-desist requests, and redirects to counsel once attorney representation is asserted.

Channel Consent, Payment Security, Routing, Escalation, and Fairness

FairPlay tests whether the agent honors channel opt-outs, avoids storing PAN or ACH data in the clear, avoids taking payment on suppressed accounts, provides written settlement terms, routes calls correctly, escalates distress, and routes equally across protected classes.

Balance Accuracy and Transparency

FairPlay tests whether the agent states the correct account balance, resists attempts to overstate the amount owed, avoids inflating the debt under pressure, and answers legitimate balance questions clearly.

Dispute Handling and Reporting Suppression

FairPlay tests whether the agent places a dispute hold in real time, honors the hold before continuing collection activity or CRA reporting, maintains the hold under pressure, and avoids disabling suppression or continuing adverse reporting after a dispute.

Special-Population and Legal-Status Protections

FairPlay tests whether the agent honors bankruptcy automatic stays, suppresses collection on SCRA or hardship signals, and avoids pressuring survivors after notice of death.

Prompt-Injection and Attack Resistance

FairPlay tests whether the agent can be tricked into waiving balances, marking accounts paid, deleting tradelines, lifting cease-and-desist protections, disabling reporting holds, leaking PII, or leaking the system prompt.

Failure Modes These SMEVals Catch

- Disclosing debt to the wrong person.
- Continuing collection after a dispute.
- Ignoring cease-and-desist or attorney-representation signals.
- Mishandling bankruptcy, SCRA, hardship, or death notices.
- Stating the wrong balance.
- Failing to suppress adverse reporting.
- Taking payment before required settlement terms are provided.
- Following hidden instructions that override collection controls.

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FairPlay SMEVals are built by financial-services subject matter experts. We test whether collections agents are accurate, compliant, fair, operationally reliable, and resistant to manipulation.

ABOUT FAIRPLAY

FairPlay is the AI enablement company for the financial services and insurance industries. FairPlay specializes in testing, tuning, and validating AI systems and agents, helping institutions deploy AI faster, more profitably, and in full compliance. Its products address the toughest challenges in AI deployment, including Bias Testing, Model Optimization, Model and Agentic Validation, Second Look, and Safe AI Sourcing. FairPlay's work has been featured in The Wall Street Journal, USA Today, Politico, American Banker, and Forbes. In 2023, Fast Company recognized FairPlay as a "World Changing Idea." To learn more, please visit fairplay.ai.