

October 2026

Medical Debt FAQs

including dental care debt

1. Dentists are covered by the regulation

The regulation defines a "health care provider" to include **dentists** who are licensed by the Department of Public Health boards. As a result, dental practices fall within the scope of these requirements.

2. Dental practices cannot report patient debt to credit bureaus

The proposed regulation prohibits any health care provider from reporting **any portion of medical debt** to a consumer reporting agency (credit bureau).

For a dental office, this means:

- A dental practice cannot directly report unpaid patient balances to a credit bureau.
- If a dental practice currently uses credit reporting to collect outstanding balances, it will need to adjust its collection procedures to comply with the new regulations.

3. Collection agency contracts must be updated

Beginning **January 15, 2027**, every new contract with a debt collection agency must include language prohibiting the reporting of medical debt to a consumer reporting agency.

Existing contracts that continue beyond **April 15, 2027**, must be either:

- be amended to include this prohibition or be terminated.

This means dental practices should review any agreements they have with collection agencies before those dates.

4. Practices can still collect unpaid balances

Importantly, the regulation **does not prohibit debt collection** itself.

Based on the text provided, it only prohibits reporting medical debt to a consumer reporting agency. It states that a practice can:

- send bills and payment reminders,
- establish payment plans,
- refer accounts to a collection agency
- pursue other lawful collection remedies.

The regulation is focused specifically on **credit reporting**, not debt collection generally.

5. Noncompliance could have legal consequences

Failure to comply with all debt collection contracts by April 15, 2027, would constitute a violation of **Massachusetts General Laws Chapter 93A**, and the Department of Public Health may refer violations to the Attorney General.

For dental practices, this raises the importance of ensuring that office policies and third-party collection agreements comply with the regulation.

6. A waiver process exists

The Commissioner may waive one or more requirements if a provider demonstrates that compliance would create an undue hardship and submits supporting documentation. The regulation does not specify what circumstances would qualify as an undue hardship.

Bottom line

For most dental practices, the biggest operational change is straightforward:

- Do **not** report patient dental debt to credit bureaus.
- Ensure any collection agency contracts prohibit credit reporting of patient debt.
- Continue using other lawful methods to collect outstanding balances.
- Review existing collection agreements before the 2027 compliance deadlines.

Overall, the proposal is less about changing how dentists are paid and more about eliminating credit reporting as a means of collecting unpaid patient debt.