# Oregon Department of Consumer and Business Services
# Division of Financial Regulation, Bulletin No. DFR 2026-8

**To**: Companies Offering Tax Relief Services in Oregon

**Date**: September 2, 2026

**RE**: Oregon Debt Management Service Provider Registration Requirements

**Purpose**:

The purpose of this bulletin is to amend Bulletin No. DFR 2025-1 issued on January 10, 2025 and clarify that all companies offering tax relief services, regardless of whether the company is located in Oregon or another state, are required to register as a debt management service provider under Oregon Revised Statutes (ORS) 697.602 to 697.842.

Companies offering tax relief services in Oregon should use the Nationwide Multistate Licensing System (NMLS) to register as a debt management service provider. The NMLS creates an efficient licensing process among state regulators. The link to the licensing page is provided for your convenience:
https://dfr.oregon.gov/business/licensing/financial/pages/debt-management.aspx.

**Authority**:

ORS 697.602 to 697.842, collectively referred to as the DMSP Act

**Relevant Statutes**:

A company that provides “tax relief” or “tax help” is required to register with the division as a debt management service provider as defined in ORS 697.602(3), because it is offering a “debt management service” as that term is defined in ORS 697.602(2). The registration requirement applies to all companies offering “tax relief” or “tax help” regardless of whether a company is located in Oregon or another state.

ORS 697.612(1)(a) requires “debt management service providers” to register with the division to “perform a debt management service” in Oregon. ORS 697.602(3) defines a “debt management service provider” as a person that: “resides or does business in this state; and provides or performs, or represents that the person can or will provide or perform a debt management service in return for or in expectation of money or other valuable consideration.”

Under ORS 697.602(2), the definition of a “debt management service activity” includes an activity in which a person receives money or other valuable consideration in return “for receiving funds from a consumer to distribute among the consumer’s creditors in full or partial payment of the consumer’s debts regardless of whether or not the person holds the consumer’s funds; modifying or offering to modify terms and conditions of an existing loan or obligation; or obtaining or attempting to obtain as an intermediary on a consumer’s behalf a concession from a creditor including, but not limited to, a reduction in the principal, interest, penalties or fees associated with a debt.”

**Definition of “Business”; “Obligation”; and “Debt” Under Oregon Law**

The words “business”; “obligation”; and “debt” are not statutorily defined in the DMSP Act, and therefore “the plain, natural, and ordinary meaning” of the words as described in *Webster’s Third* dictionary apply. *Kohring v. Ballard*, 355 Or 297, 304 n 2 (Or 2014) (explaining that *Webster’s Third* has a “descriptive” focus on “ordinary usage” in contrast with other dictionaries with a “prescriptive” focus on “correct’ usage”). In addition to using the “plain, natural and ordinary meaning of the word “debt” contained in ORS 697.602, under Oregon law, the general directive in interpreting and applying a statute “is not to insert what has been omitted, or to omit what has been inserted.” ORS 174.010; *see also PGE v. Bureau of Labor and Industries (BOLI)*, 317 Or 606, 610–12 (1993), *as modified by State v. Gaines*, 346 Or 160, 171–73 (2009).

“Business” as defined in *Webster’s* includes “dealings or transactions especially of an economic nature.” A company is engaged in business as a debt management service provider if the company’s primary mission is to generate profits from offering debt management services in exchange for receiving a fee or other compensation for those services; in essence, their activities are fundamentally economic in nature because they are “established, maintained, or conducted for the purpose of making a profit.” In short, a person “does business” in Oregon as a debt management service provider because its primary mission is to engage in a profit-seeking activity.

*Webster’s* defines “obligation” as something that a person “must do because of a law, rule, promise, etc.” *Webster’s* defines “debt” as something owed. Based upon these definitions, the DMSP Act applies to *all* debts and obligations, regardless of whether the “debt” or “obligation” is secured or unsecured.

**Personal State and Federal Tax Obligations**

Personal state and federal tax obligations fall within the definition of “obligation” and “debt” contained in *Webster’s*. A consumer’s personal state and federal tax obligations represent sums that the consumer owes and is required to pay to the applicable governmental authority. *See, e.g.*, ORS 314.440(1) (“Every tax imposed by any law imposing a tax upon or measured by net income . . . shall become, from the time such liability is incurred, a personal debt, due the State of Oregon, from the person or persons liable therefor.”); *United States v. Rodgers*, 461 U.S. 677, 682 (1983) (explaining that the government “may, for example, simply sue for the unpaid amount [of taxes], and, on getting a judgment, exercise the usual rights of a judgment creditor.”) *See also FTC and State of Nevada vs. American Tax Service LLC*, (2: 25-cv-01894-GMN-EJY, October 6, 2025). Accordingly, companies offering Oregon consumers help or assistance with personal state and/or federal tax obligations are engaged in a “debt management activity” as defined in ORS 697.602(2)

### Licensing Requirements

Companies offering “tax relief” or “tax help” to Oregon consumers must comply with the registration  requirements contained in DMSP Act, regardless of whether they are located in Oregon or another state.

This bulletin takes effect upon publication.

9/2/2026

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Date