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NYC SHIELD rule
compliance checklist

The SHIELD Rule takes effect September 1, 2026.

Use this checklist to assess where your operations stand and what needs to change before the deadline.

Contact caps: 3-in-7

☐ **Audit all outbound communication platforms**

Dialers, SMS platforms, email tools. Map every system touching NYC consumers.

☐ **Figure out how contact attempts are tracked across channels**

A single cross-channel counter per account. Calls, texts and emails must share one limit.

☐ **Configure hard stops at 3 attempts within any 7-day window**

No overrides, no manual exceptions. The rule is a hard limit, not a presumption.

☐ **Test suppression logic across all channels simultaneously**

Confirm that a contact logged in your dialer is visible to your SMS and email platforms.

Dispute intake: any channel, any time

☐ **Identify every inbound channel consumers use to reach you**

Inbound calls, SMS replies, email replies, web forms. All are valid dispute channels under SHIELD.

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Dispute intake: any channel, any time (continued)

☐ **Establish dispute detection policies for SMS and email inbound workflows**

A reply of 'I don't owe this' to an outbound SMS is a formal dispute. Your policies must account for it.

☐ **Implement automatic collection hold on dispute receipt**

Collection must cease the moment a dispute is raised, regardless of channel.

☐ **Create a centralised dispute log with timestamps and channel source**

Every dispute must be recorded. The 60-day verification clock starts from the date of dispute.

☐ **Implement automatic collection hold on dispute receipt**

Collection must cease the moment a dispute is raised, regardless of channel.

Verification: 60-day hard deadline

☐ **Audit documentation standards on all NYC placement files**

Default judgments do not count. Original account-level documentation is required.

☐ **Set 60-day verification timers on all open and incoming disputes**

Missing the window means losing the right to collect that account entirely.

☐ **Establish escalation process for disputes approaching the deadline**

Someone must own the clock. Define who is responsible and at what threshold they escalate.

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Medical debt (if applicable)

☐ **Remove medical debt from credit bureau reporting workflows for NYC accounts**

SHIELD prohibits furnishing medical debt information to consumer reporting agencies.

The SHIELD Rule is one of many signals that collections operations are getting more complex to run. If you're thinking through what that means for your team, we're happy to talk.

Reach out at hello@corafone.com.