

Consumer Debt Litigation Index

Top Recommendations for Reform in Iowa

Iowa's Score: 27/100

Iowa's National Rank: 14th

Consumer debt lawsuits dominate civil court dockets across the country. In an overwhelming number of cases—more than 70% in many places—the people sued do not respond or defend themselves. As a result, courts often enter default judgments without determining whether the defendant even knows about it, it is timely, or has merit. In turn, people face high fees and interest, onerous payment plans, seizure of wages and possessions, and potential imprisonment. States across the country have established laws and practices aimed at reducing unjust lawsuits and producing fairer outcomes. To support states in their respective efforts, the National Center for Access to Justice in 2024 created the Consumer Debt Litigation Index in consultation with a panel of experts. The Index ranks the states on their progress in adopting 24 best policies (“benchmarks”) for fairness. See our Top Recommendations and Complete Findings, below.

1. Establish Pleading Requirements (Benchmark 6)

Why: People facing debt collection lawsuits often have difficulty understanding the claim against them. Lax pleading requirements also invite illegitimate lawsuits. Requiring complaints to name the original creditor, demonstrate ownership of the debt, and itemize specific amounts sought, can deter meritless filings and enable defendants to assert legitimate defenses, promoting fairness. Delaware, New Mexico, New York, and Washington, D.C. all require consumer debt complaints to include all three key elements. Iowa does not meet the benchmark because Iowa's Consumer Credit Code does not require pleadings in consumer credit actions to include (a) the name of the original creditor, (b) the basis of plaintiff's claim, or (c) itemization of the amount sought.

How: Iowa should adopt a law or practice that requires plaintiffs in all consumer debt cases to allege: (a) the name of the original creditor; (b) the plaintiff's standing (e.g. the chain of ownership of the debt); and (c) an itemization of the amount sought, including debt principal, interest, fees, costs, and other charges to date. If it does so, the state's score would increase 10 points.

2. Require Authenticated Business Records for A Default (Benchmark 7)

Why: Creditors too often bring legally insufficient cases, relying on the likelihood that many defendants will not respond (or “default”) and that the merits of the creditors’ claims will never be assessed by a court. Requiring creditors to establish -- before a default judgment may be entered -- (a) proof of service, (b) validity of the debt using authenticated business records, and (c) itemized amounts sought, also with authenticated business records, promotes fairness, as these elements deter lawsuits that lack merit and lower the number of unjust default judgments. Alaska, Maine, New York, Washington, D.C., Washington State, and Wisconsin all require creditors to prove all three essential elements before a court may enter a default judgment. Iowa does not require any of these three elements as a condition for obtaining a default judgment in all consumer debt collection cases.

How: Indiana should adopt a law or practice that requires plaintiffs in all consumer debt cases--including cases brought by original creditors--to allege: (a) the name of the original creditor; (b) the plaintiff’s standing (e.g. the chain of ownership of the debt); and (c) an itemization of the amount sought, including debt principal, interest, fees, costs, and other charges to date. If it does so, the state's score would increase 10 points.

3. Ensure that Garnishment Exemptions for Bank Accounts Are Self-Executing (Benchmark 14) and Update Garnishment and Attachment Exemptions (Benchmark 15)

Why: Without sufficient protections, garnishment and attachment orders to seize money or assets from a debtor to pay a creditor can leave people unhoused, unable to keep a car to drive to work, and stuck in cycles of poverty. Federal law exempts some funds from garnishment and some property from attachment, but debtors often do not learn what funds and property are exempt or how to assert exemptions. Further, the federal exemptions are out of date and inadequate to preserve even a very basic standard of living. Many states—including California, Idaho, Maryland and Wyoming—make some exemptions “self-executing”, meaning that a bank must protect exempt funds even when the debtor does not assert exemptions (Benchmark 14). Other states have increased garnishment and asset exemptions (Benchmark 15). For example, in consumer debt cases Texas has garnishment exemptions that protect 100% of a person's wages, and attachment exemptions that protect a home (of any value) and personal property (including a car) up to a value of \$100,000 for a family or \$50,000 for an individual. Iowa, however, does not have self-executing bank account exemptions, and it has not increased garnishment and attachment exemptions sufficiently for a person's income and a person's car.

How: Iowa should make bank account exemptions self-executing. Further, Iowa should update and expand on garnishment and attachment provisions so that they protect at minimum: (a) income of at least \$576.92 per week, the minimum to keep a family of four above the federal poverty level, as defined by the U.S. Federal Poverty Guidelines in 2023 and (b) a car valued up to at least \$15,000. If it does so, the Iowa's score would increase 7 points.

What Would Happen if Iowa were to Implement these Recommendations?

These three recommendations, if adopted by the state, would substantially increase Iowa's score and ranking. For more on how Iowa can do better, see the complete findings below and visit NCAJ's [Consumer Debt Litigation Index](https://ncaj.org/state-rankings/consumer-debt) at <https://ncaj.org/state-rankings/consumer-debt> or reach out to NCAJ at NCAJ@fordham.edu.

Complete Consumer Debt Litigation Index Findings for Iowa

I. Issue Area: Help people know when they are being sued and where to find help.

1 - Government Notice of Lawsuits

Score: 0/5

Does the state respond to the problem of ineffective or fraudulent ("sewer") service in consumer debt lawsuits by: a. Public Official Service - requiring that a public official (e.g. the court or the sheriff) handle service? or, b. Court Supplemental Notice - requiring the court to send the defendant, by first class mail, supplemental notice of a new consumer debt lawsuit and deny default judgment if that notice is returned as undeliverable?

No

Iowa does not meet this benchmark because it does not meet either sub-benchmark 1a or 1b. First, Iowa does not meet sub-benchmark 1a because Iowa does not differentiate between lawsuits for consumer debt and other civil lawsuits, and Iowa law permits personal service by individuals who are not public officials. See Iowa R. Civ. P. 1.305(1). "Original notices may be served by any person who is neither a party nor the attorney for a party to the action." Iowa R. Civ. P. 1.302(4). Second, Iowa does not meet sub-benchmark 1b because it does not require that the court provide supplemental notice of a consumer debt lawsuit, and that default judgment be denied if mail is returned as undeliverable.

2 - Guidance on Finding Help

Score: 0/5

Does the state require that notice to the defendant in a consumer debt lawsuit include guidance on where to seek help, including free legal assistance?

No

Iowa does not meet this benchmark because Iowa does not require that notice in a consumer debt lawsuit provide guidance for defendants on where to find help. See Iowa R. Civ. P. 1.302(1).

II. Issue Area: Make it easier to respond to a lawsuit.

3 - Simplified Answer

Score: 2/2

Does the state provide a simple Answer process by making available an Answer form for use by unrepresented persons in consumer debt lawsuits?

Yes

Iowa does not meet this benchmark because, although it provides an Answer form for use in small claims court, see https://www.legis.iowa.gov/docs/ACO/CR/LINC/06-01-2018.CourtOrder.062618_SC_Order.pdf, it does not provide an Answer form for use in its District Court, where all claims in excess of \$6,500 must be filed.

4 - No Notarization Requirement to Answer

Score: 2/2

Does the state make it easier to respond to consumer debt lawsuits by never requiring defendants to have an Answer notarized before filing?

Yes

Iowa meets this benchmark because it does not require that a pleading be verified except when specifically required by rule or statute. See Iowa R. Civ. P. 1.413(1). No such rule or statute applies to an Answer in a consumer debt litigation.

5 - No Fee to Answer

Score: 5/5

Does the state permit the filing of an Answer in consumer debt lawsuits without charging a filing fee?

Yes

Iowa meets the benchmark because there is no fee for filing an answer identified among the list of filing fees for small claims court. Iowa Code § 631.6. Claims involving disputes of \$6,500 or less are heard in small claims court. Iowa Code § 631.6 (1972). See also, Iowa Judicial Branch, Small Claims. <https://www.iowacourts.gov/for-the-public/representing-yourself/small-claims>

III. Issue Area: Require the creditor to provide evidence of a valid debt claim.

6 - Pleading Requirement

Score: 0/10

Does the state require consumer debt complaints to allege all of the following: a. Name of original creditor; b. Basis of plaintiff's standing (e.g. chain of ownership of debt); and c. Itemization of amount sought including debt principal, interest, fees, costs, and other charges to date?

No

Iowa does not meet the benchmark because Iowa's Consumer Credit Code, which sets forth the pleading requirements for actions brought by a creditor against a consumer arising from a consumer credit transaction, does not require such pleadings to include (a) the name of the original creditor, (b) the basis of plaintiff's claim, or (c) itemization of the amount sought. See Iowa Code § 537.5114(1) (establishing pleading requirements for actions "brought by a creditor against a consumer arising from a consumer credit transaction").

7 - Authenticated Records for Default

Score: 0/10

Does the state require the following be established before a default judgment can be granted: a. Proof of Service b. Validity of debt through authenticated business records (e.g. contract, account statements, or other evidence of obligation); and c. Amount of judgment through authenticated business records, itemizing damages, court fees, attorneys' fees, and interest?

No

Iowa does not meet the benchmark or any of its sub-benchmarks. Iowa courts may grant default judgments pursuant to Iowa Rule of Civil Procedure 1.972 (which also applies to small claims except as noted in the rule). That rule does not impose any of the requirements in sub-benchmarks (a) to (c). See Iowa R. Civ. P. 1.972 In addition, the Iowa Code states that “[n]o default judgment shall be entered in the action in favor of the creditor [in an action arising from a consumer credit transaction] unless the complaint is verified by the creditor, or unless sworn testimony, by affidavit or otherwise, is adduced showing that the creditor is entitled to the relief demanded.” Iowa Code § 537.5114(2). But that requirement applies only to “an action brought by a creditor against a consumer arising from a consumer credit transaction,” id. § 537.5114(1), and does not specifically satisfy any of the sub-benchmarks. Finally, Iowa has enacted the Iowa Fair Debt Collection Practices Act, which includes a list of “prohibited practices,” but does not include any conditions on the entry of default judgments in cases of consumer debt. See Iowa Code §§ 537.7103.

IV. Issue Area: Require consumer debt collection actions to be brought within a reasonable time of non-payment.

8 - Burden on Plaintiff to Allege Timeliness

Score: 0/2

Does the state place the pleading burden on the consumer debt plaintiff to allege in the Complaint the timeliness of each claim, including each of the following: a. applicable statute of limitations; b. date that claim accrued; and c. date that statute of limitations expires?

No

Iowa does not meet the benchmark because there is no requirement for a consumer debt complaint to include (a) the applicable statute of limitations, (b) the date the claim accrued, or (c) the date the statute of limitations expired. See Iowa Code § 537.5114(1) (establishing pleading requirements for actions “brought by a creditor against a consumer arising from a consumer credit transaction”); *Magana v. State*, No. 20-1653, 2022 WL 10861589, at *3 (Iowa Ct. App. Oct. 19, 2022) (noting that “[g]enerally, a party raises the statute of limitations as an affirmative defense,” but may also do so through a motion to dismiss).

9 - Four Year Statute of Limitations

Score: 0/5

Does the state require 4-year (or shorter) statute of limitations for the causes of action most commonly used to pursue consumer debt collection: breach of contract (written or oral), open account, account stated, unjust enrichment, conversion, bad check?

No

Iowa does not meet this Benchmark because it does not impose a 4-year (or shorter) statute of limitations for all consumer debt claims. In particular, Iowa has the following limitations periods: • breach of written contract: 10-year limitations period (Iowa Code Ann. § 614.1(5)(a)); • breach of oral contract: 5-year limitations period (Iowa Code Ann. § 614.1(4)); • open account: 5-year limitations period (*Gemini Capital Group v. New*, 807 N.W.2d 157 (Iowa App. 2011)(finding that an action on a delinquent credit card account balance is an action to enforce an oral, rather than a written contract, and thus the action must be brought within five years of the action accruing)); • account stated: 10-year limitations period (*Alcoa Employees and Community Credit Union*

v. Tooley, 06-0095, 2006 WL 2706163 (Iowa App. Sept. 21, 2006) (stating that the statute of limitations for when a debt becomes account stated is 10 years)); • unjust enrichment: 5-year limitations period (Iowa Code Ann. § 614.1(4); see Dolezal v. City of Cedar Rapids, 326 N.W.2d 355, 360 (Iowa 1982) (holding the plaintiff's unjust enrichment claim is subject to the five-year statute of limitations on unwritten contracts)); and • conversion: two-year or five year limitations period (Iowa law is unclear on the statute of limitations for a conversion claim. The limitations period is either the two-year period for injuries to persons (Iowa Code Ann. § 614.1(2)) or the five-year period for injuries to property (Iowa Code Ann. § 614.1(4))).

10 - Prohibit Revival of Time-Barred Claims

Score: 0/2

Does the state prohibit revival of time-barred consumer debt claims, even where defendant makes subsequent payment toward a debt?

No

Iowa does not meet this Benchmark because it makes consumer debt claims subject to revival even after the statute of limitations has run, including when a debtor makes a subsequent payment toward the debt, explicitly acknowledges the debt, or expresses a new promise to pay the full debt. See Iowa Code section 614.11 (stating that "causes of action founded on contract are revived by an admission in writing, signed by the party to be charged, that the debt is unpaid, or by a like new promise to pay the same"); Schroedl v. McTague, 145 N.W.2d 48, 57 (Iowa 1966) (when payment is acknowledged in writing signed by the alleged debtor, that the debt otherwise barred by statute is revived).

V. Issue Area: Prohibit attorneys' fee shifting, and cap interest.

11 - Prohibit Attorneys' Fees Shifting

Score: 3/3

Does the state prohibit attorneys' fee shifting in consumer debt lawsuits regardless of contractual provision or reciprocity in fee shifting?

Yes

Iowa meets the benchmark because it prohibits attorneys' fee shifting in consumer debt lawsuits regardless of contractual provisions. The Iowa Code provides that consumer credit transaction contracts "may not provide for the payment by the consumer of attorney fees." Iowa Code § 537.257. "Consumer credit transaction" is defined as "a consumer credit sale or consumer loan, or a refinancing or consolidation thereof, or a consumer lease, or a consumer rental purchase agreement" but excludes goods, services, or benefits provided by the state or its agencies. Iowa Code § 537.1301(12).

12 - Interest Caps

Score: 0/3

Does the state cap interest in consumer debt lawsuits (regardless of any contractual provision) as follows: a. Pre-judgment interest for debt buyers capped at an annual rate of 7% (or less); and b. Post-judgment interest for all creditors capped at 5% (or less) of the judgment?

No

Iowa does not meet this benchmark because it does not satisfy the requirements of sub-benchmarks (a) and (b). With respect to prejudgment interest, Iowa law states that in most cases (including express contracts and loans) interest will be set at 5% per year unless the parties agree in writing at a rate of interest not to exceed "two percentage points above the monthly average ten-year constant maturity interest rate of United States government notes and bonds as published by the board of governors of the federal reserve system for the

calendar month preceding the month during which the maximum rate based thereon will be effective, rounded to the nearest one-fourth of one percent per year.” Iowa Code § 535.2(1) & (3) (2022). (The statute also sets forth specific exceptions when there is no limit on the interest rate expressed in a contract, such as contracts relating to the borrowing of money to purchase real estate, money borrowed to improve real property, and money borrowed for business purposes. See Iowa Code § 535.2(2)(a).) Thus, Iowa does not expressly limit prejudgment interest to 7% or less (as is required to meet sub-benchmark (a)), although, at particular times, it may effectively cap prejudgment interest at that amount depending on the interest rate set by the federal reserve. With respect to post-judgment interest, Iowa law states: “Interest shall be allowed on all money due on judgments and decrees of courts at a rate calculated according to section 668.13, “which in turn sets post-judgment interest at (1) the interest rate set by the contract on which the judgment or decree is rendered (up to the maximum set by section 535.2 above), or (if no written contract with a rate of interest applies) a “rate equal to the one-year treasury constant maturity published by the federal reserve in the H15 report settled immediately prior to the date of the judgment plus two percent.” Iowa Code §§ 535.3, 668.13 (2022). Thus, Iowa does not limit post-judgment interest on debt to 5% or less of the judgment (as is required to meet sub-benchmark (b)), although, at particular times, it may effectively cap prejudgment interest at that amount depending on the interest rate set by the federal reserve.

VI. Issue Area: Reduce the likelihood that consumer debt collection actions leave people homeless, or perpetuate a cycle of debt.

13 - Require Court Order to Garnish or Attach

Score: 5/5

Does the state in consumer debt lawsuits require a court order for garnishment and attachment?

Yes

Iowa meets the benchmark because the court clerk must issue execution after a judgment. Iowa Code § 626.7; Iowa Code § 642.1. In small claims court, the court has authority to mandate installment payments immediately following judgment. Iowa Code § 631.12.

14 - Bank Account Garnishment Exemptions Are Self Executing

Score: 0/2

Does state law require in consumer debt lawsuits that garnishment exemptions for bank accounts are self-executing?

No

Iowa does not meet the benchmark because it does not require financial institutions to protect money deposited in bank accounts unless a judgment debtor asserts an exemption. See Iowa Code § 642.21. See also Iowa Code § 627.6.

15 - Essential Exemptions

Score: 0/5

Does the state prevent people from becoming impoverished, unhoused, or unable to work by exempting income and assets from attachment and garnishment, as follows: a. Income of at least \$576.92 per week, the minimum to keep a family of four above the federal poverty level, as defined by the U.S. Federal Poverty Guidelines in 2023; b. Home, regardless of value, or at least the median price of a home in the state; and c. Car value, state exemption for, at least, the first \$15,000 in value?

No

Iowa does not meet the benchmark because sub-benchmarks (a) (income) and (c) (car) are not met. Iowa law provides as follows: (a) Income: Iowa does not meet sub-benchmark (a) because it only exempts 75% of a person's weekly disposable earnings or 40 times the federal minimum hourly wage in effect when the person is paid, whichever is greater, subject to certain limited exceptions. Iowa Code § 537.5105(2)(a). Forty times the federal minimum wage (\$7.25 per hour in 2023) is only \$290. State Minimum Wage Laws, U.S. Dep't of Labor (Sept. 30, 2023), <https://www.dol.gov/agencies/whd/minimum-wage/state>. (b) Home: Iowa meets sub-benchmark (b) because it exempts one home regardless of value. Iowa Code §§ 561.16, 561.2 (limiting, however, the number of exempt acres to 40 or 0.5 in a city, subject to a limited exception). (c) Car: Iowa does not meet sub-benchmark (c) because a person's interest in one car is exempt only up to a value of \$7,000. Iowa Code § 627.6(9) (although Iowa offers a wildcard exemption of \$1,000 of a person's interest in personal property that may be applied to a car). For more information on garnishment exemptions see Michael Best and Carolyn Carter, No Fresh Start 2023, National Consumer Law Center (Dec. 2023), https://www.nclc.org/wp-content/uploads/2023/12/2023_Report_No-Fresh-Start-3.pdf.

16 - Require Prior Notice of Garnishment

Score: 0/5

Does the state require notice to debtor prior to actual garnishment that explains all of the following: a. potential exemptions? b. how to challenge the order? and c. how to assert exemptions?

No

Iowa does not meet this benchmark because the state does not require prior notice of garnishment exemption or how to assert them. A judgment debtor is only required to be notified of wage garnishment at the time the employer delivers the wages that have not been garnished. See Iowa Code Ann. § 642.14(B) (West 2023).) For non-wage garnishment, a judgment debtor is only required to be served by the judgment creditor within seven business days after a sheriff files a garnishee's answer (which is seven business days after the sheriff takes answers from a garnishee following service upon the garnishee). See id. at §§ 642.14A, 642.5(4). Additionally, even if notice were served prior to garnishment, Iowa would not meet sub-benchmark (a) (potential exemptions) because the notice need not describe the specific exemptions; sub-benchmark (b) (how to challenge the order) because the notice need not describe the manner in which an order can be challenged; or sub-benchmark (c) (how to assert exemptions) because the notice need not instruct the judgment debtor on the manner for asserting the exemptions. See id. at § 642.14B.

VII. Issue Area: Eliminate debtors' prison.

17 - Prohibit Incarceration for Failure to Obey a Court Order to Pay Consumer Debt

Score: 5/5

Does the state prohibit incarceration for contempt for failure to obey a court order to pay all or part of a consumer debt judgment?

Yes

Iowa meets the benchmark because it prohibits incarceration for contempt for failure to obey a court order to pay all or part of a debt judgment. The Iowa Supreme Court has held a court may not imprison a person for failing to obey a court order to pay a debt. As the court explained in *In re Marriage of Lenger*, 336 N.W.2d 191, 192 (Iowa 1983): "Contempt proceedings are not available to collect ordinary money judgments by reason of art. I, § 19 of the Iowa Constitution which provides: 'No person shall be imprisoned for debt in any civil action, on mesne or final process, unless in case of fraud.'"

18 - Prohibit Incarceration for Failure to Obey a Court Order to Appear at a Debtor's Examination, Unless Nonappearance Was Willful

Score: 0/5

Does the state prohibit arrest and/or incarceration for contempt for failure to appear at a debtor's examination (i.e. a judgment enforcement proceeding), unless the person's failure to appear was willful?

No

Iowa does not meet the benchmark because the law provides that if a judgment debtor, after being personally served, fails to appear at a debtor's examination, "the debtor will be guilty of contempt, and may be arrested and imprisoned until the debtor complies with the requirements of the law in this respect." Iowa Code Ann. § 630.11.

19 - Provide Right to Counsel

Score: 5/5

Does the state provide a lawyer without charge in any contempt or other proceeding in which incarceration is a potential outcome in a consumer debt lawsuit?

Yes

Iowa meets the benchmark because the law provides that the "public defender shall coordinate the provision of legal representation to all indigents...against whom a contempt action is pending." Iowa Code § 13B.4(1)(b)

VIII. Issue Area: Prevent government from undue intervention on behalf of creditor.

20 - Prohibit Collaboration Between Creditors and Prosecutors

Score: 0/2

Does the state prohibit relationships (including financial relationships) in which prosecutors lend the authority of their offices to facilitate the activities of debt collectors (e.g. payments by creditors to prosecutors who threaten or bring criminal prosecutions in bad check cases)?

No

Iowa does not meet this benchmark because there is no statutory or judicial prohibition on relationships or financial arrangements between prosecutors and debt collectors. See Iowa Code § 554.3513.

21 - Prohibit Paying Bail/Bond to Creditor

Score: 0/2

Does the state prohibit use of bail to pay the creditor in all contempt proceedings, or in other proceedings in a consumer debt lawsuit in which incarceration is a possible outcome?

No

Iowa does not meet the benchmark because its laws do not include an express prohibition on the use of bail or bond to pay a creditor. See Iowa Code Ann. § 630.15.

22 - Limit Frequency of Examinations

Score: 0/5

Does the state in consumer debt litigation schedule or otherwise limit financial examinations to no more than once per year?

No

Iowa does not meet this benchmark because, if the execution against property of a judgment debtor is returned unsatisfied in whole or in part, the "owner of the judgment is entitled to an order for appearance and examination of the debtor." The law does not limit the frequency or timing of such examinations. Iowa Code Ann. § 630.1; Iowa Code Ann. § 630.10

IX. Issue Area: Collect data to improve the system.

23 - Data Collection: Number of Lawsuits

Score: 0/3

Do state courts at least annually collect and publish statewide data on number of consumer debt lawsuits?

No

Iowa does not meet the benchmark because it does not collect and publish specific data on the number of consumer debt lawsuits or the types of dispositions of consumer debt lawsuits. There do not appear to be any court rules, administrative guidance or other laws requiring any reports other than caseload reports from each judge. Note: The Iowa Supreme Court has established the Iowa Access to Justice Commission at the recommendation of the Iowa State Bar Association and one of the topics it is intended to address is assisting Iowa parties with understanding the debt collection process. See Iowa Judicial Branch, ACCESS TO JUSTICE COMMISSION (last visited July 28, 2023). See <https://www.iowacourts.gov/iowa-courts/access-to-justice-commission/>. See also Iowa Judicial Branch, STATISTICS (last visited July 28, 2023). See <https://www.iowacourts.gov/iowa-courts/court-of-appeals/caseload-statistics>.

24 - Data Collection: Disposition of Lawsuits

Score: 0/2

Do state courts at least annually collect and publish statewide data on types of dispositions of consumer debt lawsuits?

No

Iowa does not meet the benchmark because it does not collect and publish specific data on the number of consumer debt lawsuits or the types of dispositions of consumer debt lawsuits. There do not appear to be any court rules, administrative guidance or other laws requiring any reports other than caseload reports from each judge. Note: The Iowa Supreme Court has established the Iowa Access to Justice Commission at the recommendation of the Iowa State Bar Association and one of the topics it is intended to address is assisting Iowa parties with understanding the debt collection process. See Iowa Judicial Branch, ACCESS TO JUSTICE COMMISSION (last visited July 28, 2023). See <https://www.iowacourts.gov/iowa-courts/access-to-justice-commission/>. See also Iowa Judicial Branch, STATISTICS (last visited July 28, 2023). See <https://www.iowacourts.gov/iowa-courts/court-of-appeals/caseload-statistics>.

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