

**Recommendation: Tracking****Recommendation Status:**

<b>Recommendation #</b>	<b>Type/Subject</b>	<b>Discussed</b>	<b>Member Agreement</b>	<b>Final Draft Completed</b>
1	CFPB/ Bureau should adopt a penalty schedule-matrix based on consumer harm for how it will assess penalties and include an ability to adjust the penalty to further deterrence  <b>Hixon page 1 item 1</b>	Yes	Yes	No
2	Congress-CFPB-FTC / A) The Bureau and FTC should assess penalties in the same way so the same result is achieved no matter which agency leads investigation. B) Congress should establish a civil penalty commission (Sentencing Commission) to develop a consistent penalty structure for consumer protection violations across the regulating agencies (prudentials, FTC, CFPB)  <b>Hixon page 2 item 2</b>	Yes	Yes	No
3	Congress-CFPB-FTC / Retain dual jurisdiction with the FTC to leverage each organization's relative expertise  <b>Hixon page 2 item 3</b>	Yes	Yes	No

4	CFPB / Bureau should make an effort to publicly define “consumer harm” using a principle based definition rather than a case by case definition process  <b>Hixon page 3 item 4</b>	Yes	Yes	No
5	CFPB / CFPB should engage in cost benefit analysis and retrospective reviews of its regulations  <b>Hixon page 4 item 3</b>	Yes	Yes	No
6	Congress -CFPB / Rethink what is needed by a consumer in a disclosure to protect consumers and orient the disclosure system accordingly  <b>Hixon page 6/7 item 6</b>	Yes	Yes	No
7	CFPB / Bring competition’s effects on consumer choice and remedies into deliberations under the Dodd Frank mandate to consider effects on competition  <b>Hixon page 7 item 1</b>	Yes	Yes	No
8	CFPB / Incorporate effects on inclusion, access, and choice into deliberations under the Dodd Frank mandate to consider these issues  <b>Hixon page 8 item 2</b>	Yes	Yes	No
9	CFPB / Organize CFPB activity around markets-products instead of tools in the way a consumer	Yes	Yes	No

	approaches financial transactions (ex: consumer looks at a payday loan and his/her experience revolves around the total effects of regulation-enforcement-supervision-education)  <b>Hixon page 8/9 item 1</b>			
10	CFPB / Create an office of Policy Planning for planning and assessment to help shape bureau priorities, allocate resources, coordinate action through the Bureau similar to FTC's OPP  <b>Hixon page 9 item 2</b>	Yes	Yes	No
11	CFPB / E disclosures hold great promise so Bureau should study how they can be used to inform consumers and improve efficiency  <b>Hixon page 9 item 1</b>	Yes	Yes	No
12	CFPB / Apply usability testing standards (vs current emphasis on comprehension standards) in the review assessment of disclosures to focus on what is important and of value to consumers  <b>Hixon page 10 item 2</b>	Yes	Yes	No
13	CFPB / Build up CFPB capability to research competition issues to help Bureau use competition analysis in assessing its actions  <b>Hixon page 10 item 3</b>	Yes	Yes	No
14	CFPB and Other Regulators / Study if and how the consumer protection regime under Dodd	Yes	Yes	No

	<p>Frank is affecting financial institutions (for example: causing mergers, driving entities from markets) and these effects impact overall consumer protection</p> <p><b>Hixon page 10 item 4</b></p>			
15	<p>CFPB / Bureau should conduct general ongoing study of the cost structure of different types of products looking at overall cost as well as regulatory cost</p> <p><b>Hixon page 11 item 5</b></p>	Yes	Yes	No
16	<p>CFPB / Update studies on credit reports, a previous FTC study looked only at accuracy of information in credit reports. New study should consider if information not included in credit reports should be included</p> <p><b>Hixon page 11 item 1</b></p>	Yes	Yes	No
17	<p>CFPB / Study how small dollar credit use and consumer harms are affected by delay's in payment processing</p> <p><b>Hixon page 11 item 2</b></p>	Yes	Yes	No
18	<p>CFPB / Research effect of student loans on financial well being and financial maturation of consumers (how financial development of consumer is affected with focus on credit scores and mortgage availability)</p>	Yes	Yes	No

	<b>Hixon page 11/12 item 3</b>			
19	Congress / Use federal preemption theory and give CFPB exclusive power to issue federal charters to assist non-depository institutions to engage in interstate commerce at lower costs  <b>Hixon page 12 item 2</b>	Yes	Yes	No
20	Congress / Repeal E-sign and give rule writing authority to CFPB or other agencies for overall electronic disclosures  <b>Hixon page 12 item 3</b>	Yes	Yes	No
21	Congress / Develop a system of faster payments  <b>Hixon page 13 item 4</b>	Yes	Yes	No