

Consumer Financial Protection Bureau
1700 G Street NW
Washington, D.C. 20552



July 23, 2020

Briefing memorandum for the Director

Taskforce on Federal Consumer Financial Law Monthly Check-in

DATE	Thursday, July 23, 2020
TIME	1:00 pm – 1:30 pm Eastern
LOCATION	WebEx
PARTICIPANTS	Matt Cameron, Assistant Director, OSM Todd Zywicki, Taskforce Chair Nat Weber, Taskforce Staff Director Tom Pahl, Deputy Director
STAFF CONTACT	Matt Cameron, Assistant Director, x [Redacted]
POLICY ASSOCIATE	Andrew Duke, Policy Associate Director, CEEA, x [Redacted]
DIRECTOR APPROVAL	Delicia Hand, Deputy Associate Director, CEEA, x [Redacted]

Objective

The primary objective of this meeting is to provide you with a status update related to the Taskforce on Federal Consumer Financial Law's (Taskforce) work.

Timing Considerations

The Taskforce governance documents state that the Director or her designee will hold monthly check-in meetings with the Taskforce Chair and the Staff Director, but there are no specific deadlines or other timing considerations to consider for this meeting.

Background

The Taskforce will (1) examine the existing legal and regulatory environment facing consumers and financial services providers; and (2) report its recommendations for ways to improve and strengthen consumer financial laws and regulations, including recommendations for resolving conflicting requirements or inconsistencies, reducing unwarranted regulatory burdens in light of market or technological developments, improving consumer understanding of markets and products, and identifying gaps in knowledge that should be addressed through future Bureau research.

Pursuant to the Taskforce Roles and Responsibilities document, the Staff Director and Taskforce Chair will hold a monthly check-in with the Director to provide status updates on its work. The Staff Director will utilize the attached milestone schedule in **Tab 1** to discuss accomplishments to date, work currently in-progress, planned work, and risks that the team is working to mitigate. The Taskforce Chair will use the attached Chapter Outline in **Tab 2** to discuss the evolution of the report's contents and its progress. The Chair will also share requests for resource support, any support needed in addressing dissent, or scope clarification questions that may require executive input.

This is the sixth monthly check-in with the Staff Director and Taskforce Chair, but this is the first monthly check-in with Nat Weber serving as Staff Director. Your last interaction with the Taskforce Chair and Staff Director occurred a week ago at the Taskforce Public Hearing held as part of Consumer Financial Protection Week. Your last required monthly meeting with the Taskforce Chair and Staff Director was the June 25 Monthly Check-in. Below is a brief update that the Staff Director and Chair will expound upon during the monthly check-in.

Internal Bureau & External Engagements

- The Taskforce held a two-hour Public Hearing on July 16, 2020 during Consumer Financial Protection Week. You made opening remarks at the event. The Taskforce conversed with a panel of four academic experts in the field of consumer financial protection. Information developed during the hearing is expected to help guide Taskforce work. The conversation generally revolved around five topics:
 1. Legal framework of consumer protection
 2. Consumer information and education

3. Competition and innovation
4. Inclusion and access
5. Regulatory modernization and flexibility

A recording of the discussion will be put on the Bureau website, and a transcript will be ordered. Additionally, the team will highlight useful recommendations and research discussed during the hearing so it can be considered for inclusion in the report. **Tab 6** contains information related to the Public Hearing.

- Earlier in the year, the Bureau issued a Request for Information (RFI) on March 27, 2020. The comment period closed on June 1, 2020. During the Taskforce four-day meeting held the week of June 15 – 19, Taskforce members were initially briefed on the RFI responses based on a preliminary review of the submitted material. A final summary of the RFI feedback is provided in **Tab 4**.
- In conjunction with the RFI, to ensure Taskforce members are made aware of the diversity of views held by consumer groups and trade organizations in case the COVID-19 pandemic limited the ability of stakeholders to submit comments to the RFI, Taskforce support staff researched, summarized, and recorded publicly available stakeholder views to supplement responses to the RFI. Taskforce members were initially briefed last month on the collected material along with the RFI briefing. A final summary of the Public Research findings is provided in **Tab 5**.
- The Taskforce continues to implement its state and federal outreach plan. It is guided in this effort by the attached state and federal outreach plan located in **Tab 3**. The next event in this outreach effort is a meeting with the Conference of State Bank Supervisors (CSBS). The Taskforce Chair was set to meet with officials from this group on July 15, but the meeting was postponed by CSBS a few days prior to the event. Efforts are underway to reschedule and conduct this meeting sometime on or before July 24.
- The support team will engage with the Intergovernmental team to begin arranging meetings throughout August for the Taskforce Chair to engage with key stakeholders from each of the state and federal organizations listed in **Tab 3**.
- Efforts will be made in August to begin the process of sharing with Bureau senior leadership the overall direction of the Taskforce's initiative.

Report Progress

- The Taskforce members will generate a two-volume report, which will be informed by the public, meeting with Bureau experts, and leveraging members' past insights and expertise.
- For the first volume of the report, members will analyze data regarding the benefits and costs of consumer financial products and services and review the existing consumer financial regulatory framework to develop a common understanding of the history and current state of federal consumer financial laws and their influence on the marketplace.
- This week, starting Tuesday and working thru Friday, the Taskforce is meeting via WebEx in two-hour sessions, twice a day. The Taskforce continues with peer review and discussion of the 13 chapters of Volume I that are now nearing final form. Only part of this week's meeting will focus on Volume I. Most activity during the week will be the continued formulation of the recommendations to be captured in Volume II.
 - The team is moving forward with action items formulated during the Taskforce meeting during the June 15 – 19 gathering. Completion of some of these items requires outreach to other Bureau stakeholders with specialized knowledge. The requests for this support in researching or drafting small, well-defined scopes of work continues. A comprehensive list of requests can be shared upon request.
 - The Taskforce pivot to the future from its work to date on the history and current state of consumer financial protection has arrived as the group begins the process of forming specific recommendations for improvements to the protection system. These recommendations will be passed to you in Volume II of the report.

Attachment

Tab 1: Taskforce Milestone Schedule Draft.

Tab 2: Draft Taskforce Chapter Outline.

Tab 3: Taskforce State and Federal Outreach Plan.

Tab 4: RFI Summary.

Tab 5: Public Research Summary.

Tab 6: Public Hearing Record.

Tab 7: Taskforce Key Points Document.