

# Rulemakings Archive

## 2018

### CFPB Sources and Use of Data

- Dec. 27, 2018 deadline to respond to the CFPB's request for information on the consumer bureau's sources and use of data. Consumer comments.

### Faster Payments

- Dec. 14, 2018 deadline to comment on potential actions by the Federal Reserve Board to create a real time payment system. Consumer comments.

### Community Reinvestment Act

- Nov. 19, 2018 deadline to comment on advance notice of proposed rulemaking by the Office of the Comptroller of the Currency on a new framework to implement the Community Reinvestment Act. Consumer comments.

### CFPB Global Financial Innovation Network

- Oct. 14, 2018 deadline to provide feedback on draft consultation document issued by CFPB for initiative to create a Global Financial Innovation Network.

### CFPB Trial Disclosures

- Oct. 10, 2018 deadline to comment on proposed CFPB policy guidance to encourage trial disclosure programs. Short consumer opposition comments. Longer comments.

### Unfair and Deceptive Acts and Practices

- August 20, 2018 deadline to respond to the Federal Trade Commission request for comments on Topic 10 regarding hearings on competition and consumer protection in the 21st century.
- August 20, 2018 deadline to respond to the Federal Trade Commission request for comments on Topic 11 regarding hearings on competition and consumer protection in the 21st century.

### Credit Union Small Dollar Loans

- August 3, 2018 deadline to respond to the NCUA Board request for comments regarding its proposal to amend NCUA's general lending rule to provide federal credit unions (FCUs) with an additional option to offer payday alternative loans (PALs). Coalition comments.

### CFPB Consumer Complaints and Inquiries

- July 16, 2018 deadline to respond to request for comment to assist the Bureau in assessing its handling of consumer complaints and consumer inquiries. Coalition comments.

## **CFPB Financial Education Programs**

- July 9, 2018 deadline to respond to request for comment to assist the Bureau in assessing the overall efficiency and effectiveness of its consumer financial education programs. Coalition comments.

## **CFPB Guidance Materials**

- July 2, 2018 deadline to respond to request for comment to assist the Bureau in assessing the overall effectiveness and accessibility of its guidance materials and activities to members of the general public, including regulated entities. Coalition comments.

## **CFPB Inherited Regulations**

- June 25, 2018 deadline to respond to request for comment to assist the Bureau should amend the regulations or exercise the rulemaking authorities that it inherited from certain other Federal agencies. Overreaching coalition comments, More detailed comments on Regulation E, overdraft fees and bank accounts issues, Fair lending, Electronic communications, Property Assessed Clean Energy (PACE) loans and Regulation Z (TILA), X (RESPA) and FTC mortgage rules.

## **CFPB's Adopted Regulations**

- June 19, 2018 deadline to respond to request for comment to assist the Bureau in considering whether the Bureau should amend those rules it has promulgated since its creation or issue certain new rules. Overarching coalition comments || More detailed comments covering mortgage, prepaid account, remittances and credit card regulations, and upcoming debt collection regulations.

## **PACE Mortgage Loans**

- June 8, 2018 deadline to comment on draft California regulations on Property Assessed Clean Energy (PACE) loans. Consumer comments.

## **CFPB Rule Making Processes**

- June 7, 2018 deadline to respond to request for comment to assist the Bureau in assessing the overall efficiency and effectiveness of its rulemaking processes. Consumer comments and Shorter coalition comments.

## **CFPB Consumer Complaint Information**

- June 4, 2018 deadline to respond to CFPB request for information on the Consumer Bureau's public reporting practices of consumer complaint information. Consumer comments.

## **CFPB External Engagements**

- May 29, 2018 deadline to respond to request for comment on the CFPB's public and non-public external engagements, including but not limited to field hearings, town halls, roundtables, and meetings of the Advisory Board and Councils. Consumer coalition comments.

## **CFPB Supervision Program**

- May 21, 2018 deadline to request for comment on the overall efficiency and effectiveness of the CFPB's Supervision Program whether any changes to the program would be appropriate. Detailed comments of consumer groups and shorter coalition comments.

## **CFPB's Enforcement Processes**

- May 14, 2018 deadline to respond to CFPB request for information about the efficiency and effectiveness of its processes related to the enforcement of Federal consumer financial law. Consumer comments and Shorter coalition comments.

## **CFPB's Administrative Adjudications**

- May 7, 2018 deadline to respond to request for information on the CFPB's rules of practice for adjudication proceedings.

## **CFPB's College Credit Card Database**

- April 30, 2018 deadline to respond to the CFPB's request for comment on its information collection on consumer and college credit card agreements.

## **CFPB's Civil Investigative Demands**

- April 26, 2018 deadline to submit comments in response to request for information about the CFPB's civil investigation demands and processes. Coalition comments || Longer consumer comments, April 23, 2018

## **Credit Scores**

- Feb. 18, 2018 deadline to respond to CFPB request for information about about consumers' experience with free access to credit scores. Consumer groups' comments.

## **Fair Housing Act**

- Jan. 26, 2018 comments on HUD's Implementation of the Fair Housing Act's Discriminatory Effects Standard.

## **Electronic Payments**

- Jan. 26, 2018 deadline to respond to request for comments from NACHA on expanding same day ACH payments and credits. Feb. 23, 2018 deadline to request for comments on interest in ACH processing on weekends and holidays.

# **2017**

## **CFPB Complaints System**

- Dec. 28, 2017 deadline to respond to CFPB's request for comments on Information Collection Plan for Consumer Complaint and Information Collection System and on Consumer Response Intake Form. Consumer comments.

## **Direct Selling Industry**

- Letter to the FTC regarding the Commission's guidance to the multi-level-marketing (MLM) industry, Nov. 3, 2017

## **Small Business Lending**

- Sept. 14, 2017 deadline to respond to CFPB request for information about data collection on credit applications by small, women-owned and minority-owned businesses.

## **Prepaid Accounts**

- Aug. 14, 2017 deadline to comment on proposed amendments by the CFPB to the prepaid account regulations. Consumer comments.

## **Nursing Home Arbitration Agreements**

- Aug. 7, 2017 deadline to comment on proposal by CMS to rescind rule barring forced arbitration clauses in nursing home contracts.

## **Altered and Forged Checks**

- Aug. 1, 2017 deadline to comment on proposed rule by the Federal Reserve Board on the treatment of disputed checks. Consumer comments.

## **Reducing Regulations**

- July 31, 2017 deadline to comment to the Treasury Department on regulations that can be eliminated, modified, or streamlined in order to reduce burdens in order to implement President Trump's directive to eliminate 2 regulations for every 1 new one.

## **Ability to Repay/Qualified Mortgage Rule**

- July 31 2017 deadline to submit comments to the CFPB on its assessment of the Ability to Repay/Qualified Mortgage Rule. Group Comments.

## **Gainful Employment, Student Loan Borrower Defense and Arbitration Rules**

- July 12, 2017 deadline to comment to the Department of Education on two negotiated rulemakings to revise gainful employment regulations and rules adopting procedures to give borrowers defenses to repayment of students loans for fraudulent schools and prohibiting forced arbitration clauses.

## **Mortgage Servicing**

- July 10, 2017 deadline to comment to the CFPB on its assessment of the Mortgage Servicing Rules under the Real Estate Settlement Procedures Act. Group Comments.

## **VA Mortgage Loans**

- June 12, 2017 deadline to comment on *Loan Guaranty: Revisions to Allowable Charges and Fees Assessed Incident to VA-Guaranteed Home Loans*, Consumer comments.

## **Campus Debit Cards**

- June 8, 2017 deadline to comment on the fees charged on campus debit cards and proposed disclosures. Group comments.

## **Credit Cards**

- June 8, 2017 deadline to respond to CFPB's request for information about the credit card market. NCLC Comments and attachments.

## **Remittance Rule**

- May 23, 2017 deadline to submit comments to CFPB on assessment of international remittances rule. Consumer comments.

## **Consumer Remittance Transfer**

- May 23, 2017 deadline to comment on CFPB's plans for assessing the effectiveness of the remittance rule. Consumer comments.

## **Alternative Data**

- May 19, 2017 deadline to respond to request for information from the CFPB about the impact of alternative data on credit access for consumers who are credit invisible. Group comments.

## **Ethnicity and Race Information Collection**

- May 25, 2017 deadline to submit comments to the CFPB on proposed amendments to regulations under the Home Mortgage Disclosure Act regarding data reporting || Consumer Comments.
- May 4, 2017 deadline to submit comments to the CFPB on proposed amendments to Equal Credit Opportunity Act (Regulation B) regarding ethnicity and race Information collection. Consumer Comments.

## **OCC Fintech Charter Applications**

- April 14, 2017 Comments re: Evaluating Charter Applications From Financial Technology Companies.
- April 14, 2017 deadline to comment on the OCC's draft supplement to its Licensing Manual explaining how licensing standards and requirements applying for special purpose national bank charters.

## **Prepaid Cards**

- April 5, 2017 deadline to comment on the CFPB's extension of the effective date of the prepaid card rule. Consumer comments.

## **Consumer Access to Own Financial Records**

- Feb. 21, 2017 deadline to respond to request for information by the CFPB on consumers' ability to access their financial account and account-related data in connection with other products or services. NCLC comments. Coalition comments.

## **Cyber security**

- Feb. 17, 2017 deadline to respond to advance notice of proposed rulemaking by OCC, FDIC and Fed on cyber risk management standards (enhanced standards) for large and interconnected entities under their supervision and those entities' service providers.

## **Executive Order Reducing Regulations**

- Feb. 13, 2017 Comment and letter to OMB on executive order on "Reducing Regulation and Controlling Regulatory Costs."

## **OCC Fintech National Bank Charter**

- Jan. 15, 2017 to comment on OCC white paper about a special purpose national bank charter for fintech companies. Comments should be submitted to specialpurposecharter@occ.treas.gov. NCLC comments. Short coalition comments.

# **2016**

## **Framework for new OCC chartered nonbank entities that fail**

- Nov. 14, 2016 deadline to respond to proposed rule by the OCC to implement a framework for receivership of an "uninsured bank" (i.e., a nonbank that is granted an OCC charter under a new regime the OCC is considering). Consumer Comments. Press release.

## **Payday and Installment Loans**

- November 7, 2016 deadline to respond to the CFPB's Request for Information about practices involving practices and loans not addressed in the proposed rule governing payday, installment and auto title loans. Consumer comments.
- October 7, 2016 deadline to comment on proposed rule to regulate payday and installment loans. Group comments.

## **Standards for Safeguarding Customer Information**

- November 7, 2016 deadline to respond to the FTC request for comments on its Standards for Safeguarding Customer Information ("Safeguards Rule" or "Rule").

## **Rent-a-Bank Partnerships**

- Oct. 27, 2016 extended deadline to comment on proposed guidance by the FDIC on bank third-party lending partnerships. Consumer Comments.

## **Mortgage Disclosures**

- Oct. 18, 2016 deadline to comment on various CFPB proposed amendments to mortgage disclosure requirements under the Real Estate Settlement Procedures Act and the Truth in Lending Act that are implemented in Regulation Z. Group Comments.

## **Broadband Privacy**

- Letter from NCLC and 38 other advocacy organizations urging the FCC to oppose opt-in customer consent for broadband & other telecom. providers and to prohibit forced arbitration clauses in contracts, Sept. 7, 2016

## **Student Loan Debt and Arbitration Clauses**

- Aug. 1, 2016 deadline to comment on Dept. of Education proposal on borrower defense to repayment of predatory school loans and proposal to bar forced arbitration clauses. NCLC and legal services comments. Shorter coalition comments. Broad coalition comments on arbitration.

## **Arbitration and Class Actions Bans**

- August 22, 2016 deadline to comment on CFPB proposal to prohibit arbitration clauses that contain class action bans. Summary || NCLC Comments || Press Release.

## **FFIEC Consumer Compliance Rating System**

- July 5, 2016 deadline to comment on proposed Uniform Interagency Consumer Compliance Rating System to be used by federal bank examiners. Consumer comments.

## **Financial Innovation**

- May 31, 2016 deadline to submit comments responding to the OCC's white paper about how to support responsible financing innovation.
- Consumer comments and exhibits.

## **E-Warranties**

- June 17, 2016 deadline to comment on rules proposed by the FTC permitting warranties to be posted online.

## **Mobile Financial Services and Economic Inclusion**

- June 15, 2016 deadline to comment to FDIC on its plans for exploring the economic inclusion potential of mobile financial services.

## **Arbitration Clauses in Internet Contracts**

- May 26, 2016 deadline to respond to FCC's request for comment on whether it should ban forced arbitration clauses in internet broadband contracts. Consumer comments.

## **Regulatory Review (mortgage appraisals, interchange fees)**

- March 23, 2016 deadline to comment on whether various regulations (including those covering mortgage appraisal rules and debit card interchange fees) are outdated or need updates.
- Consumer comments on interchange fees and prepaid cards, Mar. 22, 2016

- Consumer comments to the OCC on mortgage successors in interest, Mar. 21, 2016

## **FTC Holder Rule**

- Feb. 12, 2016 deadline to file comments for the FTC's review of the holder rule, which protects car buyers, students and others from fraudulent practices in credit sales. Consumer comments.

# **2015**

## **Payment Processors**

- Oct. 9, 2015 deadline to comment on proposed NACHA rules increasing the monitoring of payment processors. Consumer Comments.

## **Online Marketplace Lending**

- Sept. 30, 2015 to comment on request for information from the Treasury Department about online marketplace lending using investment capital and data-driven online platforms to lend to small businesses and consumers.
- NCLC comments to the U.S. Department of Treasury's request for information on online marketplace lending, Sept. 30, 2015

## **Payroll Cards**

- July 31, 2015 deadline to comment on the Department of Labor's proposed rulemaking regarding "Methods of Payment of Wages", July 31, 2015. Consumer comments

## **Same Day Fed Electronic Payments**

- July 2, 2015 deadline to comment on Fed proposal to adopt a same day ACH service. Consumer comments.

## **California Payday Loans**

- June 25, 2015 extended deadline to respond to California proposal to restrict internet payday loans and adopt other payday loan reforms.

## **Credit Cards**

- May 18, 2015 deadline to respond to CFPB's request for comments on how credit card market is function. First Set of Consumer Comments.
- June 17, 2015 deadline to respond to CFPB's request for information re credit card debt collection, add-on products, grace periods and online disclosures. Second Set of Consumer Comments.

## **Check Deposits, CRA and Other Regulations**

- May 14, 2015 deadline to comment on whether OCC, FDIC or Fed regulations are outdated or unnecessary or unduly burden community banks. The regulations under review include the funds availability policies for check deposits and CRA regulations. Consumer Comments.



## **Mortgages by Small Creditors and in Rural or Underserved Areas**

- Comments to the CFPB regarding TILA – Regulation Z – Rural Mortgage Lending Exceptions for Small Creditors, April 25, 2016
- March 30, 2015 deadline to comment on rules proposed by the CFPB, 80 Fed. Reg. 7769, RIN 3170-AA43, to provide greater exemptions from TILA rules on mortgage lending by certain small lenders. Comments.

## **Student Loan Servicing**

- July 13, 2015 deadline to comment on CFPB’s request for Information regarding student loan servicing. NCLC comments, NCLC/NACBA comments.
- March 30, 2015 extended deadline to respond to Education Department’s request for information on how it should restructure student loan servicing.

## **Prepaid Cards**

- March 23, 2015 deadline to comment on the CFPB’s proposed rules governing prepaid and payroll cards. Fact Sheet: CFPB’s Proposed Prepaid Card Rule. NCLC Comments. Comments only. Exhibits only. NCLC and Coalition Comments. Press Release.

## **Credit Card Agreement Database**

- March 13, 2015 deadline to comment on CFPB proposal to suspend adding new credit card agreements to database pending improvements.

## **Used Car Rule**

- March 17, 2015 extended deadline to comment on the FTC’s proposed amendments to the Used Motor Vehicle Trade Regulation Rule. Group comments.

## **Mortgage Servicing**

- March 16, 2015 deadline to comment on mortgage servicing rules under TILA and RESPA proposed by the CFPB. NCLC Comments.

## **Safe Students Accounts**

- March 16, 2015 deadline to comment on a “Safe Student Account Scorecard” that would help colleges to avoid partnering with financial institutions that offer checking and prepaid accounts with tricks and traps. Consumer comments.

## **CFPB Advisory Board Applications**

- Feb. 28, 2015 deadline to apply to be a member of the CFPB’s Consumer Advisory Board.

## **Model State Regulation of Virtual Currencies**

- Feb. 16, 2015 deadline to comment on draft Model Regulatory Framework by the Conference of State Bank Supervisors that includes licensing, consumer protection, market stability, anti-money laundering, and cybersecurity requirements for state licensed virtual currency firms. Consumer Comments.

## **Same Day Electronic Payments**

- Feb. 6, 2015 deadline to comment on NACHA proposal to enable same day electronic payment and settlement. Consumer Comments.

## **Federal Student Aid PIN system**

- Comments to the U.S. Department of Education on Information Collection on Personal Authentication Service (PAS) for FSA ID, Jan. 20, 2015

## **CFPB Language Access Plan**

- Jan. 6, 2015 deadline to comment on the CFPB's plan to provide services and information in languages other than English.

# **2014**

## **Military Lending Act**

- Dec. 26, 2014 extended deadline to comment on DOD's proposed rules expanding the Military Lending Act's 36% rate cap and arbitration ban to more forms of credit. Consumer Comments.

## **CFPB No-Action Letters**

- Dec. 15, 2014 deadline to comment on proposed CFPB policy on issuing no-action letters for innovative products that pose uncertainty as to legal rules. Consumer Comments.

## **Auto Lenders Subject to CFPB Examination**

- Dec. 8, 2014 deadline to comment on CFPB proposed rules defining the larger participants in the auto lending market subject to CFPB examination. Comments.

## **Robo Calls to Cell Phone**

- Comments filed Nov. 17, 2014 opposing Consumer Bankers Association petition to FCC to expand exemptions to Telephone Consumer Protection Act.

## **Credit Practices Rule and Other Bank UDAPs**

- Oct. 27, 2014 deadline to comment on proposal by bank regulators to repeal Regulation AA (setting forth unfair, deceptive or abusive practices by banks) (due to repeal of authority in Dodd-Frank Act). NCLC Comments.

## **Financial Coaching Evaluation**

- Nov. 3, 2014 deadline to comment on proposed collection of information to evaluate financing coaching project.

## **Expanded HMDA Mortgage Data**

- October 22, 2014 deadline to comment on CFPB proposal to expand the data that must be reported under the Home Mortgage Disclosure Act and to simplify reporting requirements.

Press Release, NCLC Comments and subsequent group comments.

## **Telemarketing Sales Rule**

- Nov. 13, 2014 to provide comments to the FTC on whether updates are needed to improve the TSR. Comments.

## **Public Access to CFPB Complaint Narratives**

- September 22, 2014 extended deadline to submit comments on CFPB proposal to permit consumers to make available to the public the narratives of the complaints they submit to the CFPB on particular companies. Consumer comments.

## **Mobile Payments**

- Sept. 10, 2014 deadline to respond to CFPB request for comments on mobile financial services. NCLC Comments.

## **Economic Growth and Regulatory Paperwork Reduction Act**

- Sept. 2, 2014 deadline to comment on 10-year review of regulations that are outdated, unnecessary or burdensome. Consumer comments to OCC on preemption and Garn St. Germain and to Fed on remotely created checks and Regulation CC.

## **Big Data**

- Aug. 15, 2014 pre-workshop deadline and Oct. 15, 2014 final deadline for comments to the FTC on Big Data: A Tool for Inclusion or Exclusion?

## **CFPB Debt Collection Survey**

- August 22, 2014 extended deadline to submit comments on the CFPB's proposal to survey consumers about their experiences with debt collectors.

## **Annual Privacy Notices**

- July 14, 2014 deadline to comment on proposed rule permitting companies that use a model form and limit data sharing to post their annual privacy notices online instead of by delivering them individually.

## **Truth in Lending Act - Regulation Z (Qualified Mortgage Rule)**

- June 5, 2014 and July 7, 2014 deadline to comment on proposed CFPB amendments to the Truth in Lending Act, Regulation Z, Qualified Mortgage Rule. NCLC comments, Part 1 (6/5/14); NCLC Comments, Part 2 (7/7/14).

## **International Remittances**

- June 6, 2014 extended deadline to comment on CFPB proposal to extend to 2020 a temporary exemption that permits insured institutions to estimate certain pricing disclosures for international remittances.

## **For-Profit Career Colleges**

- May 27, 2014 deadline to respond to proposed rules by the Department of Education to protect students from predatory, poor-performing career colleges. Summary of proposal.

## **California Payday Loans**

- May 21, 2014 deadline to respond to proposed California Department of Corporations regulations governing internet payday loans and the relationship between prepaid cards and payday loans. NCLC Comments.

## **TANF EBT Restrictions and Cash Access**

- May 7, 2014 deadline to comment to HHS on proposed rules to implement ban on access to EBT cards at liquor, gambling and adult entertainment venues and requirement that states provide adequate access to cash benefits. NCLC Comments.

## **Supervision of Larger International Remittance Providers**

- April 1, 2014 deadline to comment on the CFPB's proposal for how to define the larger international money transmitters who will be subject to CFPB supervision.

## **Debt Collection**

- February 28, 2014 deadline to submit comments to the CFPB on how it should regulate debt collectors. NCLC Comments and Shorter Coalition Comments. S. 2328 (Toomey), exempting attorneys from the FDCPA (oppose).

## **CFPB Consumer Advisory Board**

- Feb. 28, 2014 deadline to apply to be a member of the CFPB's Consumer Advisory Board.

## **Collection of Data on Bank Fees and Remittances**

- Feb. 13, 2014 deadline to submit comments to banking agencies on collection of data on overdraft, ATM and monthly fees and on remittance transfers. NCLC comments.

## **Mortgage Closing Process**

### **FHA guaranteed mortgages**

- July 14, 2014 deadline to comment on HUD's proposed HAWK pilot program under which first-time homebuyers will receive a discount on FHA mortgage insurance premiums if they complete a series of housing counseling courses from HUD-approved agencies. NCLC Comments.

### **Integrated mortgage disclosures**

- July 7, 2015 deadline to respond to CFPB request for comment on a proposal to extend the effective date for the new, TILA/RESPA-integrated mortgage disclosures. The disclosure rules and new forms were originally scheduled to become effective on August 1, 2015. The CFPB proposes to change that date to October 3, 2015. NCLC Comments.
- Feb. 7, 2014 deadline to respond to CFPB request for information on the mortgage closing process.

## **Electronic Payments**

- January 13, 2014 deadline to comment on proposed rules by NACHA imposing greater obligations on banks, payment processors and merchants to scrutinize the payments they originate and process. Consumer Comments.

# **2013**

## **U.S. Payment System**

- December 13, 2013 deadline to submit comments to the Federal Reserve Board on how to improve the U.S. Payment System. Comments urging Fed to ban remotely created checks.

## **Mortgage Statements and Other Amendments**

- November 22, 2013 deadline to file comments on CFPB's rule amending provisions in the 2013 Mortgage Rules Under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z), 78 Fed. Reg. 62993 (October 23, 2013), including a periodic statement exemption for borrowers in bankruptcy and clarified pre-counseling disclosures for high-cost loans. NCLC Comments.

## **Telephone Bill Cramming**

- November 18, 2013 deadline to file comments on FCC's proposed rule Empowering Consumers To Prevent and Detect Billing for Unauthorized Charges ("Cramming"), 78 Fed. Reg. 61250 (October 3, 2013).

## **Reverse Mortgages**

- October 31, 2013 deadline to respond to Department of the Treasury's request for comments, 78 Fed. Reg. 60376 (October 1, 2013), on their information collection titled, "Reverse Mortgage Products: Guidance for Managing Compliance and Reputation Risks."

## **FHA Guaranteed Mortgages**

- October 30, 2013 deadline to submit comments on HUD's proposed rules on its definition of "qualified mortgage" for insured and guaranteed single family mortgages, 78 Fed. Reg. 59890 (September 30, 2013).

## **Remotely Created Checks, Deposits to Prepaid Cards and Mobile Deposits**

- September 18, 2013 comments to the Fed and CFPB on amendments to Regulation CC.

## **Military Small Dollar Loans**

- August 1, 2013 deadline to respond to DOD request for comments, 78 Fed. Reg. 36134 (June 17, 2013), RIN 0790-Aj10, on updates needed to military small dollar loan protections. Coalition comments.

## **Remotely Created Checks and Payment Orders**

- August 8, 2013 deadline to respond to proposed rules by the FTC banning certain forms of payment in connection with telemarketing sales. NCLC Comments. Coalition Comments.

## **Mortgage Rules**

- July 22, 2013 deadline to respond to CFPB request for comments, 78 Fed. Reg. 39902 (July 2, 2013), RIN 3170-AA37, on proposed amendments to several mortgage rules concerning loss mitigation procedures, qualified mortgage rules, and exemptions for creditors in rural and underserved areas.

## **Consumer Financial Civil Penalty Fund**

- July 8, 2013 deadline to comment on CFPB's proposed rule creating the Consumer Financial Civil Penalty Fund to compensate victims and fund consumer education activities.

## **Bank Payday Loans**

- May 30, 2013 deadline to comment on proposed guidances from the OCC and FDIC addressing concerns about bank payday loan. Consumer Coalition Comments. NCLC comments on prepaid card payday loans.

## **Student Loan Servicing**

- May 28, 2013 deadline to comment on CFPB's proposed rule Defining Larger Participants of the Student Loan Servicing Market for purposes of supervision.

## **Delay of Loan Compensation Rules**

- May 25, 2013 deadline to comment on CFPB's proposed rule delaying the restriction of loan originator compensation until June 1, 2013.

## **Bank Fees**

- May 6, 2013 NCLC comments supporting collection of data on overdraft, monthly and ATM fees.

## **Student Loan Disability Discharges**

- May 3, 2013 deadline to comment on Department of Education's total and permanent disability discharge form for student loan borrowers. NCLC Comments.

## **Private Student Loan Repayment Options**

- April 8, 2013 deadline to submit comments to the CFPB on ideas to expand repayment options available to private student loan borrowers, including modifications and refinancing. NCLC Comments. Shorter Coalition Comments.

## **Financial Products Marketed to College Students**

- March 18, 2013 deadline to submit comments to the CFPB about financial products and services marketed to higher education students and how partnerships between schools and financial institutions can promote positive financial decisionmaking. NCLC comments.

## **Used Car Rule**

- March 13, 2013 deadline to submit comments to the FTC on proposed changes to the required “Buyer’s Guide” disclosures for used car sales. NCLC Comments.

## **Door-to-Door Sales Rule**

- March 4, 2013 deadline to comment on FTC’s proposal to increase from \$25 to \$130 the trigger for right to cancel a door-to-door sales contract.

## **Mortgages**

- Feb. 25, 2013 deadline to submit comments to the CFPB about the proposal to revise ability-to-pay standards for mortgages. The CFPB is soliciting comment specifically on loan originator compensation related to ability-to-pay and a number of exemptions from the new standards. **Model comment letter. NCLC Comments.**

## **Credit Cards**

- Feb. 19, 2013 deadline to submit comments to the CFPB about the credit card market and the impact of the Credit CARD Act of 2009. NCLC Comments.

## **CFPB Trial Disclosures**

- Feb. 15, 2013 deadline to submit comments to the CFPB about its proposal to waive disclosure requirements for companies engaged in pilot programs to test new forms of disclosures.

## **Tax liability for discharged debt**

- March 4, 2013 deadline to submit comments to the IRS on whether governmental and certain financial entities should issue a Form 1099-C when debt is no longer being collected.

## **Remittances**

- Jan. 15 and 30, 2013 deadline to comment on CFPB’s proposed amendments to its remittance rules. Comments on the proposed delay of the effective date for the remittance rules are due January 15. Comments on the proposed rule on disclosure of fees and taxes, and liability for errors, are due January 30. NCLC Comments.

## **Credit Cards and Household Income**

- January 7, 2013 deadline to comment on proposed CFPB rules amending ability-to-pay requirements to permit consideration of household income. NCLC Comments.

# **2011-2012**

## **FDIC Underbanked Survey**

- Dec. 18, 2012 deadline to comment on survey that will be conducted in 2013 to identify efforts by financial institutions to reach underbanked, factors that impede access to bank accounts, and the size of the unbanked market.

## **Credit Union Small Dollar Loans**

- Nov. 26, 2012 deadline to submit comments to NCUA, 77 Fed. Reg. 59346 (Sept. 27, 2012), RIN 3133-AE08, about whether credit unions should be permitted to charge a higher application fee or interest rate for small dollar loans, or make bigger, small, longer or shorter loans. NCLC Comments.

## **Integrated Mortgage Disclosures**

- November 6, 2012 and September 7, 2012 deadlines to respond to CFPB request for comment on a proposed rule that creates integrated mortgage disclosures to satisfy RESPA (Reg. X) and TILA (Reg. Z) requirements. The deadline to address the delay of the effective date is September 7. Comments on all of the remainder of the proposed rule are now due November 6. NCLC Comments. Short Group Comments. NCLC Early Comments.

## **High Cost Loans and Mortgage Counseling**

- November 6, 2012 and September 7, 2012 deadlines to submit comments on rules proposed by the CFPB to implement the Dodd-Frank changes to TILA and RESPA governing high cost loans and pre-loan and homeownership counseling. Comments on the impact of a more inclusive finance charge on the scope of HOEPA have been extended to November 6. The remainder of the comments are due September 7. NCLC Comments (Sept. 7, 2012)

## **Financial Education**

- Oct. 31, 2012 deadline to respond to the CFPB's request for comments on effective financial education approaches that will help improve consumers' financial decision-making capabilities.

## **CFPB Strategic Plan**

- October 25, 2012 deadline to submit comments on the CFPB's strategic plan for 2013-2018.

## **Gift Cards**

- October 22, 2012 deadline to respond to CFPB proposal to preempt state laws that escheat gift cards to the state in less than five years. NCLC Comments.

## **Mortgage Loan Originator Compensation, Credit Insurance, Arbitration**

- October 16, 2012 deadline to comment on proposed rules by CFPB, RIN 3170-AA13, restricting mortgage loan originator compensation, arbitration and credit insurance and addressing registration of originators. NCLC Comments.

## **Mortgage Appraisals & Higher Risk Mortgages**

- October 15, 2012 deadline to comment to CFPB on proposed rules requiring that home loan borrower be given a copy of appraisals and requiring appraisals requiring appraisals for higher-risk mortgages.

## **Mortgage Servicing**

- Oct. 9, 2012 deadline to comment to the CFPB on proposed TILA and RESPA rules on mortgage servicing. NCLC Comments re: [2012 Truth in Lending Act \(Regulation Z\)](#), and NCLC Comments re: Real Estate Settlement Procedures Act (Regulation X), Oct. 9, 2012.



## **Medical Debt Collection**

- September 24, 2012 deadline to response to an IRS request for comment on proposed rule issued under the Affordable Care Act (Obamacare) requiring nonprofit hospitals to have financial assistance policies and governing collection of hospital bills. NCLC and Consumer Group Comments and Longer Comments by Healthcare groups and NCLC.

## **Reverse Mortgages**

- August 31, 2012 deadline to respond to CFPB request for information on reverse mortgages, including the factors that contribute to the use of reverse mortgages and the long-term effects of reverse mortgages on consumers.

## **Mobile Payments**

- FTC's request for comments on mobile payment issues. NCLC comments.

## **Senior Financial Scams**

- August 20, 2012 deadline to respond to CFPB request for information on financial scams that target seniors and on the resources available to educate and counsel seniors. Comments.

## **Mobile Devices: Privacy and Security**

- July 13, 2012 deadline to response to FCC request for comment on the privacy and data security practices and requirements governing information stored on mobile devices.

## **Prepaid Cards**

- July 23, 2012 deadline to tell the CFPB what rules it should adopt for prepaid cards. NCLC Comments and shorter Coalition comments.

## **“Qualified” Mortgages and Ability-to-Pay**

- July 9, 2012 deadline to submit additional comments to the CFPB on the types of mortgages that should be deemed presumptively safe and their level of protection from liability. Previous notice at 76 Fed. Reg. 27390 (May 11, 2011). NCLC comments.

## **Overdraft**

- June 29, 2012 deadline to respond to the CFPB's request for comments on the impact of overdraft programs on consumers. The Bureau seeks comments on the costs, benefits and risks to consumers of these programs. Consumer Group Comments to CFPB on Overdraft Programs, June 29, 2012

## **Consumer Arbitration Agreements**

- June 23, 2012 deadline to respond to the CFPB's request for information on the scope, sources, and methods to use to conduct a study on the impact of arbitration agreements on consumer financial products and services.

## **Fee Harvesting Credit Cards**

- June 11, 2012 deadline to respond to the CFPB's request for comments on the proposed rule

that would limit the Bureau's rulemaking authority to restrict fees on credit card accounts only to those fees assessed during the first year that a credit card account is opened. The Bureau seeks comments on the potential benefits, costs, and impacts of this proposal. NCLC Comments, Shorter Coalition Comments.

## **EBT Public Benefits Cards**

- June 11, 2012 deadline to respond to the CFPB's request to submit comments to HHS on fees or other access barriers to use of EBT cards and on implementation of ban on access at casinos and other restricted locations. NCLC Comments and Appendices.

## **College Student Prepaid and Debit Cards**

- June 6, 2012 deadline to submit comments to the Department of Education on the issues in connection with the electronic disbursement of federal financial aid, including use of school-arranged prepaid and debit cards. NCLC Comments.

## **CFPB Streamlining Regulations**

- June 4, 2012 deadline to submit comments in response to the streamlining comments submitted by other parties. NCLC Comments, June 4, 2012
- March 5, 2012 deadline to respond to CFPB's request for comments on ways that the regulations it has inherited, in all of the areas it covers, can be streamlined, and to respond to questions about ATM fee disclosures, privacy notices, HMDA and racial data reporting, stay-at-home spouse credit card ability to pay requirements and disclosures for mobile banking. NCLC Comments, Shorter Coalition Comments, Mar. 5, 2012

## **Debt Collectors and Credit Reporting Agencies Subject to CFPB Supervision**

- April 17, 2012 deadline to respond to CFPB's request for comments on proposed definition of the "larger participants" in the debt collection and consumer reporting markets who will be subject to examination and supervision by the CFPB. NCLC Comments, April 18, 2012, Shorter Coalition Comments, April 17, 2012

## **Payday Lending**

- April 23, 2012 deadline to respond to CFPB request for comments on the impact of payday loans and deposit advances on consumers. The Bureau seeks comments on whether certain consumer classes are harmed or helped by such products and if the answer depends on the type of lender that issues the loan. NCLC Comments, April 23, 2012. Shorter Coalition Comments.

## **Remittance Transfers**

- April 9, 2012 deadline to respond to the CFPB's request for comments on proposed changes to the rule on remittance transfers. The Bureau seeks comments on whether safe harbors should be included for certain businesses and whether recurring, preauthorized remittance transfers should be subject to the same disclosure requirements as one-time transfers.

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## **Motor Vehicle Sales, Financing and Leasing**

- April 1, 2012 deadline to respond to Federal Trade Commission's request for comments on consumer issues in the sale, financing and leasing of cars and other motor vehicles.

## **Information on Credit Card Pricing and Fees**

- March 19, 2012 deadline to respond to the CFPB's request for comments on the collection of information on credit card pricing and fees, including whether the information is important and useful and ways to enhance the quality, usefulness, and clarity of the information to be collected.

## **CFPB's Credit Card Complaint Data**

- January 30, 2012 deadline to respond to request for comments on disclosure of credit card complaint data.

## **CFPB "Know Before You" Owe Projects**

- The Consumer Financial Protection Bureau is seeking public input on new forms for comparing and understanding the costs of mortgages, student loans, and credit cards.
- Mortgage disclosure forms: For proposed new forms to combine existing disclosures required by the Truth in Lending Act (TILA) and the Real Estate Settlement Procedures Act (RESPA). The CFPB is also considering proposed changes to TILA (Reg. Z) and RESPA (Reg. X). Group informal comments to the CFPB, April 18, 2012.

## **Energy Efficiency Financing**

- NCLC Comments and Reply Comments to the California Public Utilities Commission Regarding On-Bill Financing and Repayment of Energy Efficiency Measures, Feb. 2012
- Mortgage Assets Affected by PACE Programs, Proposed Rule and NCLC and CFA's Comments, January 2012

## **Private Student Loans**

- Jan. 17, 2012 deadline to respond to CFPB's request for comments on experiences with private

student loans. NCLC Comments.

## **Financial Inclusion**

- Nov. 14, 2011 deadline to reply to Treasury request for comments on activities to improve access to bank accounts and other financial products. NCLC comments.

## **Magnuson-Moss Warranty Act**

- Comments in response to the FTC's request for comments in connection with its review of its rules under the Magnuson-Moss Act, which provides protections regarding warranties on consumer goods, Oct. 24, 2011

## **Credit Union & CUSO Payday Lending**

- Sept. 26, 2011 deadline to comment on proposed rules, 76 Fed. Reg. 44866 (proposed July 21, published July 27, 2011), permitting National Credit Union Administration to examine and more closely scrutinize credit union service organizations (CUSOs). NCLC comments urging scrutiny of CUSOs and credit unions doing payday lending. NCLC Comments.

## **Preemption of Alternative Mortgages**

- Sept. 22, 2011 deadline to comment on proposed interim final rule of the Consumer Financial Protection Bureau regarding preemption under Alternative Mortgages Transaction Parity Act. NCLC Comments.

## **Consumer Financial Protection Bureau**

- August 15, 2011 deadline for comments on defining the larger participants in various nonbank markets who should be subject to CFPB examination, including debt collection, consumer reporting, consumer credit, money transmitting, check cashing, prepaid cards and debt relief services.
- Consumer Groups' Comments to Bureau of Consumer Financial Protection Regarding Larger Participant Rulemaking, August 15, 2011

## **Overdraft and Bank Payday Loans**

- Issue Brief: 300% Bank Payday Loans Spreading, August 2011, Press Release, Group Comments, Sample Comments to the Federal Banking Regulator (OCC) Opposing High Overdraft Fees and 300% Interest Bank Payday Loans, August 8, 2011.

## **Preemption**

- June 27, 2011 deadline to comment on proposed rule by the OCC implementing the preemption provisions of the Dodd-Frank Act. NCLC Issue Brief. NCLC Comments.

## **Mortgages**

- July 22, 2011 NCLC-CRL Comments Regarding Ability to Pay and Qualified Mortgages.
- June 10, 2011 deadline to comment: On March 29, federal banking regulators published a proposed new regulation defines which loans mortgages lenders can sell without keeping the 5% risk retention now required for all but the newly defined Qualified Residential Mortgages (QRM).

## Remittances

- July 22, 2011 deadline to submit comments on proposed rules governing disclosures and error resolution rights for consumers who send remittance transfers to foreign countries. 76 Fed. Reg. 29902 (May 23, 2011), Docket No. R-1419, RIN 7100-AD76. NCLC Comments.

## Garnishment of Social Security and Other Federal Benefits

- May 24, 2011 deadline to comment on Interim Final Rule, 76 Fed. Reg. 9939 (Feb. 23, 2011), protecting bank accounts containing Social Security, SSI and other federal benefits from being frozen in response to a garnishment order. Comments may be filed at [www.regulations.gov](http://www.regulations.gov) by entering "3206-AM17" in the keyword field. NCLC Comments.
- Earlier NCLC Comments on Proposed Rule prohibiting banks from **freezing Social Security and SSI funds**. Sample letter.

## Student Loans

- NCLC Recommendations for Department of Education Negotiated Rulemaking, May 2011

## Truth in Lending

- May 2, 2011 deadline to comment on proposed rules, 76 Fed. Reg. 11,598 (Mar. 2, 2011), that implement Dodd-Frank requirements for establishing escrow accounts and providing related disclosures for consumers with higher-priced mortgage loans. NCLC Comments.
- July 22, 2011 deadline to comment: The proposal would implement statutory changes made by the Dodd-Frank Act that expand the scope of the ability-to-repay requirement to cover any consumer credit transaction secured by a dwelling (excluding an open-end credit plan, timeshare plan, reverse mortgage, or temporary loan). In addition, the proposal would establish standards for complying with the ability-to-repay requirement, including by making a "qualified mortgage." The proposal also implements the Act's limits on prepayment penalties. Finally, the proposal would require creditors to retain evidence of compliance with this rule for three years after a loan is consummated. NCLC Comments.

## Payment of Social Security, SSI on Prepaid Cards

- April 25, 2011 extended deadline to comment on interim final rule permitting direct deposit of Social Security, SSI and other federal payments to prepaid cards that meet certain criteria, including lack of a line of credit and protection under Regulation E. NCLC Comments.
- Earlier NCLC Comments on Proposed Rule permitting **Direct Deposit of Federal Wages and Benefits to Prepaid and Stored Value Cards**, July 13, 2009

## Credit Scores

- April 14, 2011 deadline to comment on proposed rule requiring creditors to disclose credit scores and related information to consumers in risk-based pricing and adverse action notices under the Fair Credit Reporting Act. NCLC Comments.

## Interchange Fees

- February 22, 2011 deadline to respond to proposed rules from the Federal Reserve implementing the interchange fee limits of the Dodd-Frank Act, including the definition of prepaid cards exempted from the limits. NCLC Comments.

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## **Mortgages: Truth in Lending Act**

- December 23, 2010 deadline to comment on proposed rules, 75 Fed. Reg. 58539 (Sept. 24, 2010) extensively revising Regulation Z, including rules for rescinding illegal loans, disclosures for loan modifications, definitions of higher priced mortgages, reverse mortgages and other items. One-page summary of rescission proposal. NCLC Comments.

## **Mortgage Advertising**

- November 15, 2010 deadline to comment on the FTC's proposed rules to ban deceptive mortgage ads.

## **Mortgage Licensing Rules**

- March 5, 2010 deadline to comment on proposed rules, 74 Fed. Reg. 66548, on the minimum state standards under the Secure and Fair Enforcement Mortgage Licensing Act (SAFE Act) for licensing loan originators.
  - NCLC Comments.

## **Student Loans**

- September 9, 2010 deadline to comment on the DOE's NPRM on Program Integrity: Gainful Employment
  - NCLC Comments, Sept. 8, 2010

## **UDAP**

- Comments of the NCLC and NACA Regarding Advance Notice of Proposed Rulemaking Relating to Unfair or Deceptive Acts or Practices, November 2007