AFR Americans for Financial Reform

February 7, 2018

Dear Representative/Senator,

On behalf of the undersigned national, state and local organizations, we are writing to urge your strong opposition to any efforts to bring the funding of the Consumer Financial Protection Bureau ("CFPB" or the "Bureau") under the Appropriations process. We oppose this measure on its merits but also believe attaching this provision, or the hundreds of other poison pill riders proposed for funding bills is simply an inappropriate avenue for achieving policy change. The CFPB was established by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010; it opened its doors as the nation's only financial regulator completely devoted to consumer protection in July 2011. The bureau has been a lynchpin in the safeguards which have helped our economy to recover while protecting consumers from the worst practices of the financial sector.

Since its founding, the CFPB has been protecting consumers by ensuring that markets work in an open, transparent, and fair way. The Bureau's mission is to hold financial companies accountable for being upfront about the costs of, and risks associated with, their products, and also to ensure that consumers are treated with dignity and respect, rather than set up to fail. The Bureau has successfully gone to bat for consumers, delivering results that are making markets work more fairly and putting a stop to fraud and abuse. In total, CFPB enforcements have resulted in nearly \$12 billion returned to over 29 million Americans who have been harmed by illegal, deceptive, and discriminatory practices of various companies. The agency's rules, supervision, and other activities are saving money and aiding understanding for many millions more.

Because of this remarkable track record, it would be a serious mistake for Congress to undo the CFPB's current independent funding. Like the other bank regulatory agencies, the CFPB is currently funded in a way that insulates it from the pressures Wall Street and other financial sectors—including payday and other high-cost lenders, as well as debt collectors and credit bureaus—can too easily manipulate. Making this change, as has been proposed in past financial services riders, would leave the CFPB more vulnerable than the Federal Reserve, the OCC, and the FDIC to industry influence, once again treating consumer financial protection as a less important matter. It would give Wall Street and the worst elements of the financial services industry endless lobbying opportunities to deny the CFPB the funding to do its job if and when the regulator took action that a sector of the industry did not like.

Failure to appropriately regulate the consumer financial marketplace was a central cause of the financial crisis that devastated the U.S. and global economies, costing tens of trillions of dollars, and many millions of jobs. The CFPB is a shining success story of the effort to correct the mistakes and close the gaps that led to that failure. It has required lenders who break the law to return billions of dollars directly to individual consumers, it is establishing a more level playing field in crucial areas of the market, it is providing information to consumers and research to the public, and it is doing these things in an accountable and transparent fashion.

The public overwhelmingly supports the mission of the CFPB, and supports the kinds of action it has taken. Americans see an agency responsibly undertaking the job given to it by Congress: making consumer financial markets fairer and more transparent, putting money back in the pockets of members of the public who were fleeced by illegal conduct, and policing rules of the road that make the financial system work better for responsible businesses and responsible consumers alike.

We also strongly oppose attaching any other poison pill policy riders aimed at weakening consumer final protection or financial regulation to must pass legislation. We have seen hundreds of ideological and unpopular policy proposals raised as possible riders to continuing resolutions on the budget and other popular legislation in order to gain the votes these poison pill provisions would not garner on their own. We believe this is an irresponsible avenue for enacting policy change and these riders should be rejected based on process concerns as well as on the merits.

For all of the reasons above, we urge members of Congress to oppose any poison pill financial reform policy riders, whether to put the CFPB under the normal Appropriations process, otherwise weaken the authority, structure or independence of the CFPB, or generally weaken oversight and regulation of our financial system.

Sincerely,

National Organizations

Alliance for a Just Society Allied Progress AFL-CIO American Federation of State, County and Municipal Employees (AFSCME) American Federation of Teachers Americans for Financial Reform Center for Digital Democracy Center for Economic Justice Center for Effective Government Center for Popular Democracy Center for Responsible Lending Coalition on Human Needs **Consumer** Action **Consumer Federation of America** Consumer Watchdog **Consumers** Union Demos Fair Share **Generation Progress Government Accountability Project** International Brotherhood of Teamsters International Union, United Auto Workers, UAW The Leadership Conference on Civil and Human Rights Main Street Alliance MoveOn Civic Action Mobilization for Justice, Inc.

N.e.r.v.e. Inc NAACP National Association of Consumer Advocates National Coalition for Asian Pacific American Community Development National Community Reinvestment Coalition National Consumer Law Center (on behalf of its low income clients) National Consumers League National Fair Housing Alliance National Housing Resource Center National People's Action National Urban League Other98.org PICO National Network Prosperity Now Public Citizen TICAS UnidosUS United Food and Commercial Workers, International Union U.S. PIRG United States Student Association Voices of Progress Young Invincibles

State & Local Organizations

<u>Alaska</u>

Alaska PIRG

Alabama

Alabama Appleseed Center for Law & Justice Alabama Arise Birmingham Faith in Action Central Alabama Fair Housing Center Fair Housing Center of Northern Alabama First Presbyterian Church Gowen Consulting Tuscaloosa Citizens Against Predatory Practices

Arkansas

Arkansans Against Abusive Payday Lending Arkansas Community Organization Arkansas Interfaith Alliance Arkansas Interfaith Worker Justice

<u>Arizona</u>

Arizona PIRG Arizona Community Action Association AZ Consumers Council Campesinos Sin Fronteras Center for Economic Integrity Family Housing Resources Neighborhood Housing Services of Phoenix, Inc. Newtown Community Development Corporation Old Pueblo Community Services WHEAT

California

Alliance of Californians for Community Empowerment (ACCE) California Reinvestment Coalition CALPIRG CCBHC, a public benefit non profit Community Legal Services in East Palo Alto Consumers for Auto Reliability and Safety Courage Campaign Fair Housing Council of Orange County Fair Housing Council of Riverside County, Inc. Fair Housing of Marin Fair Housing Foundation Faith in Community (Fresno) Holmes Unlimited Housing Equality Law Project (HELP) Housing Resource Center of Monterey County Housing Rights Center HPP CARES Inland Fair Housing and Mediation Board Montebello Housing Development Corporation NCCPA Inc. NID-Housing Counseling Agency Nuestra Casa de East Palo Alto RCAC Shalom Center for T.R.E.E. of Life The Greenlining Institute University of San Francisco School of Law

Colorado

Colorado Progressive Coalition CoPIRG Rocky Mountain Peace and Justice Center

Connecticut

CCAG Connecticut Fair Housing Center ConnPIRG Legal Assistance Resource Center of Connecticut, Inc.

Delaware

Delaware Alliance for Community Advancement Delaware Community Reinvestment Action Council, Inc. HOND, INC NCALL RESEARCH INC

Neighborhood House, Inc.

<u>Florida</u>

Alliance Legal Group AmStar Litigation Central Florida Community Development Corporation Consumer Debt Association Fair Housing Center of the Greater Palm Beaches Fair Housing Continuum, Inc. Florida Alliance for Consumer Protection Florida PIRG Grand Central Law, PLLC H.E.L.P. CDC Housing and Education Alliance Housing Opportunities Project for Excellence, Inc. Jacksonville Area Legal Aid, Inc. Jacobs Keeley, PLLC NANAY CEDC Organize Now R. John Cole, II, & Associates, PA Rebecca J Covey LLC St. Petersburg Neighborhood Services, Inc. dba Neighborhood Home Solutions The First Community Christian Pentecostal Church of God, Inc. War on Poverty-Florida / RAISE Florida Network

Georgia

Dalton-Whitfield Community Development Corporation GA Sustainable Community Ventures Georgia PIRG Georgia Rural Urban Summit Green Forest CDC Gwinnett Habitat for Humanity Morningstar Urban Development Inc. Savannah-Chatham County Fair Housing Council, Inc. TAPP Lumber

<u>Hawaii</u>

Habitat for Humanity West Hawaii

Iowa

Iowa Citizens for Community Improvement Iowa PIRG South Central Iowa Federation of Labor, AFL-CIO

<u>Idaho</u>

Idaho Community Action Network

<u>Illinois</u>

Brighton Park Neighborhood Council Chestnut Credit Counseling Services Chicago Appleseed Fund for Justice Chicago Consumer Coalition Debt Counsel for Seniors and Disabled Family Credit Management Services Global Network CDC **Gospel Justice Initiative** Greater Southwest Development Corporation Heartland Alliance for Human Needs & Human Rights HOPE Fair Housing Center Housing Action Illinois Illinois Asset Building Group **Illinois PIRG** MJK Legal Group LLC National Community Investment Fund NHS of Chicago NWSHC Oak Park Regional Housing Center **Open Communities** Partners In Community Building, Inc. (PICB) Project IRENE Sargent Shriver National Center on Poverty Law South Suburban Housing Center Spanish Coalition for Housing The Chicago Urban League The Resurrection Project Woodstock Institute

Indiana

Fair Housing Center of Central Indiana HomesteadCS IACED Indiana Assets & Opportunity Network Jeffersonville Housing Services Corporation

<u>Kansas</u>

Sunflower Community Action Kentucky Kentucky Equal Justice Center Louisville Urban League

Louisiana

Greater New Orleans Fair Housing Action Center Lower 9th Ward NENA NZBC Urban Corporation PREACH

Massachusetts

Allston Brighton Community Development Corporation Consumer Assistance Council, Inc. Consumer World MA Affordable Housing Alliance Mass. Assoc. of Community Development Corporations MASSPIRG The Midas Collaborative United for a Fair Economy WBZ Call For Action

Maryland

Anne Arundel County Community Action Agency Asian-American Homeownership Counseling, Inc. Baltimore Neighborhoods, Inc. HomeFree-USA Maryland Consumer Rights Coalition Maryland PIRG Progressive Maryland Public Justice Center St. Ambrose Housing Aid Center The Development Corporation of Northwest Baltimore

Maine

Coastal Enterprise, Inc. Maine Center for Economic Policy Maine People's Alliance Massachusetts Consumers' Council, Inc.

Michigan

Michigan Economic Impact Coalition PIRG in Michigan (PIRGIM) Telamon Corporation

Minnesota

TakeAction Minnesota

Missouri

Beyond Housing Credit & Homeownership Empowerment Services, Inc. Metropolitan Congregations United Missouri Faith Voices Missourians Organizing for Reform and Empowerment MoPIRG

Mississippi

Coalition for a Prosperous Mississippi Covenant Faith Outreach Ministries-Covenant Community Development Mississippi Center for Justice Mississippi Faith Leaders United for Fair Lending Mississippians for Fair Lending

<u>Montana</u>

First Congregational UCC Billings

Greater Yellowstone Central Labor Council Indian People's Action RDI Financial Inc Rural Dynnamics, inc Montana Fair Housing Montana Organizing Project

<u>Nebraska</u>

Fair Housing Center of NE-IA

<u>Nevada</u>

Community Services of Nevada (CSNV)

New Hampshire

Granite State Organizing Project NHPIRG United Valley Interfaith Project

New Jersey

Fair Housing Council of Northern NJ Housing & Community Development Network of New Jersey Law Offices of Lee M. Perlman New Jersey Citizen Action NJ PIRG

New Mexico

NMPIRG

New York

Albany County Rural Housing Alliance, Inc. Bankruptcy Law Center Buffalo Urban League Center for NYC Neighborhoods Central New York Citizens in Action, Inc. Cypress Hills Local Development Corp. Empire Justice Center Friends of the North Country, Inc. Genesee Co-op FCU Housing Help Inc. Human Development Services of Westchester Long Island Housing Services, Inc. Margert Community Corporation New Economy Project NYPIRG Pratt Area Community Council **RUPCO** Syracuse Habitat for Humanity, Inc. Westchester Residential Opportunities, INC Western New York Law Center Zeno Gloro Law Office

North Carolina

CCCS of Greater Greensboro, A division of Family Service of the Piedmont Inc. Durham Regional Finance Center Episcopal Diocese of North Carolina Financial Pathways of the Piedmont Max Gardner Law NCPIRG North Carolina Consumers Council OnTrack Financial Education & Counseling Reinvestment Partners Robeson County Community Development Corporation, Inc.

North Dakota

North Dakota Economic Security and Prosperity Alliance

<u>Ohio</u>

COHHIO Communities United For Action Cozmyk Law Offices Cuyahoga County Land Reutilization Corp. ESOP (Empowering & Strengthening Ohio's People) Fair Housing Resource Center, Inc. **Famicos Foundation** HOLA Ohio HomeOwnership Center of Greater Dayton Housing Opportunities Made Equal Housing Research & Advocacy Center Miami Valley Fair Housing Center Mills Mills Fiely and Lucas Neighborhood Housing Services of Greater Cleveland Ohio CDC Association **Ohio PIRG** WIN Working In Neighborhoods

<u>Oklahoma</u>

Oklahoma Policy Institute

Oregon

Innovative Changes NEDCO (Neighborhood Economic Development Corporation) Oregon Consumer League Oregon PIRG (OSPIRG) Portland Housing Center Willamette Neighborhood Housing Services

Pennsylvania

ACTION Housing, Inc. Affordable Housing Centers of Pennsylvania Bucks County Housing Group Bucks County Women's Advocacy Coalition Clarifi Community Legal Services, Philadelphia Gemini Consultants Integra Home Counseling, Inc. Keaveney Legal Group Keystone Research Center Northwest Counseling Service, Inc. PennPIRG Pennsylvania Council of Churches Pennsylvania National Organization for Women Schuylkill Community Action THE ONE LESS FOUNDATION One Stop Career Center of PR Inc

Rhode Island

NeighborWorks Blackstone River Valley RI Coalition for Payday Lending Reform RI State Council of Churches RIPIRG

South Carolina

Cantrell Legal PC Columbia Consumer Education Council SC Appleseed Legal Justice Cen

Tennessee

Binghampton Development Corporation Good Neighbor Foundation New Level Community Development Corp Residential Resources, Inc. Tennessee Citizen Action

Texas

Austin Tenants' Council Project LIFT Strong Families Coalition of Greater Tarrant County Texas Appleseed TexPIRG

<u>Utah</u>

Coalition of Religious Communities

Vermont

Vermont Legal Aid VT PIRG

<u>Virginia</u>

Virginia Citizens Consumer Council

Virginia Poverty Law Center

Washington

Main Street Alliance Northwest Fair Housing Alliance Parkview Services Washington Statewide Poverty Action Network WASHPIRG

<u>Wisconsin</u> Legal Aid Society of Milwaukee Metropolitan Milwaukee Fair Housing Council WISPIRG

<u>West Virginia</u> West Virginia Center on Budget and Policy West Virginia Citizen Action Group