



3138 10th Street North
Arlington, VA 22201-2149
703.522.4770 | 800.336.4644
f: 703.524.1082
nafcu@nafcu.org | nafcu.org

National Association of Federally-Insured Credit Unions

May 29, 2018

Monica Jackson
Office of the Executive Secretary
Bureau of Consumer Financial Protection
1700 G Street, NW
Washington, DC 20552

RE: Request for Information Regarding Bureau External Engagements (Docket No. CFPB-2018-0005)

Dear Ms. Jackson:

On behalf of the National Association of Federally-Insured Credit Unions (NAFCU), the only national trade association focusing exclusively on federal issues affecting the nation's federally-insured credit unions, I am writing in response to the Bureau of Consumer Financial Protection's (Bureau) request for information (RFI) regarding its external engagements.

NAFCU and our members appreciate the Bureau's efforts to assess its external engagements, and would like to take the opportunity to emphasize the importance of such outreach to our nation's credit unions. External engagement is a proactive and forward-looking approach that allows stakeholders, such as credit unions, to contribute to the Bureau's discussions on topical consumer finance issues and upcoming rulemakings. Moreover, these events are an important supplement to the Bureau's regulatory inquiries function, ensuring that the Bureau maintains an open dialogue with stakeholders from rulemaking through to implementation. As such, NAFCU believes that external engagements provide a vital forum for credit unions to have their voices heard in Washington and urges the Bureau to continue its existing channels for connecting with stakeholders.

NAFCU strongly supports the Bureau's Credit Union Advisory Council (CUAC), as it provides credit unions with an important platform to help ensure their interests are taken into account by the Bureau as it drafts rules. As membership on the CUAC is limited to representatives of credit unions with under \$10 billion in assets, it gives credit unions subject to the Bureau's rulemaking, but not its supervisory authority, a chance to be heard. Several of NAFCU's members are serving or have served on the CUAC, and all have found the experience to be immensely worthwhile. NAFCU would emphasize that it is to the Bureau's benefit to have regular contact with these community institutions so that it can fully understand the implications of its rulemakings. Moreover, as not-for-profit cooperatives focused on member service, consumer protection and education are in the lifeblood of credit unions. The Bureau benefits from hearing about the innovative and consumer-friendly practices of these small, community-based institutions.

NAFCU urges the Bureau to continue to hold meetings of the CUAC, even though it is not statutorily required by the *Dodd-Frank Wall Street Reform and Consumer Protection Act* (Dodd-Frank Act). While there is no question that the Bureau has the authority to establish the CUAC under Section 1012 of the Dodd-Frank Act, NAFCU has supported legislation, such as S. 1579, the *Bureau of Consumer Financial Protection Advisory Board Enhancement Act*, which would require the Bureau to establish a CUAC. The CUAC is a vital resource, and it is in the best interest of consumers, financial institutions and the Bureau to continue it.

In addition to the CUAC, NAFCU strongly supports the Bureau's other forms of external engagements, including meetings of the Consumer Advisory Board (CAB) and other Councils, field hearings, town halls, and roundtables. Public events such as field hearings and town halls are held across the country on topical issues, providing an important opportunity for credit unions and other stakeholders outside of Washington, DC to interact with Bureau staff and share their comments. NAFCU encourages the Bureau to hold these engagements more regularly. From July 2017 through April 2018, there was not a single public event other than the meetings of the CAB and Councils. NAFCU suggests that the Bureau hold public talks such as field hearings and town halls at least quarterly in geographically dispersed locations to ensure that the Bureau receives feedback from diverse stakeholders, not just from those inside the Beltway.

NAFCU applauds the Bureau's commitment to transparency and fairness under Acting Director Mulvaney, and encourages the Bureau to apply those ideals towards its external engagements. To the greatest extent possible, NAFCU encourages the Bureau to make its field hearings, town halls, and roundtables accessible to the public. However, in regard to meetings of the CAB and Councils, NAFCU finds that there is a tremendous benefit to balancing public and private sessions. For example, past meetings of the CUAC have included morning sessions limited to CUAC members and Bureau staff, followed by afternoon sessions open to the public. NAFCU urges the Bureau to continue to strike this balance in future meetings, as it affords transparency while allowing CUAC members to have frank discussions about the challenges and best practices associated with complying with Bureau rulemakings, without fear of disclosing confidential information to the general public.

Finally, NAFCU has several suggestions for how the Bureau could maximize attendance at external engagements. First, NAFCU recommends that the Bureau provide notice of at least 30 days to ensure that all interested stakeholders have an opportunity to participate. NAFCU also asks that the Bureau announce upcoming events through means other than just its website. To ensure that all interested parties are aware of an upcoming event, the Bureau should publish announcements through appropriate press channels, including social media. If an event is cancelled or the date is changed, the Bureau should ensure that all are promptly informed through similar methods. Lastly, to allow stakeholders across the country to participate in and benefit from Bureau external engagements, NAFCU suggests that the Bureau continue to provide livestream video of its events, as well as provide means for remote participants to submit questions and comments electronically.

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NAFCU appreciates the opportunity to provide comments on this RFI regarding Bureau external engagements. If you have any questions or concerns, please do not hesitate to contact me or Sarah Jacobs, NAFCU's Regulatory and Legislative Assistant, at sjacobs@nafcu.org or (703) 842-2231.

Sincerely,

A handwritten signature in black ink that reads "Andrew Morris". The signature is written in a cursive style with a long, sweeping underline.

Andrew Morris
Regulatory Affairs Counsel