Key	↑ accepted	↓ rejected	? further discussion

#		
	1. Supervision	
117. Jeff	? further discussion	End the practice of declaring and treating supervisory letters issued to examined institutions as proprietary information belonging to the CFPB.
118. Jeff	? further discussion	Clarify the definition of service provider currently described in CFPB Compliance Bulletin and Policy Guidance 2016-02 to make it clear that CFPB limits the definition of service provider found in section 1002 (26) of Dodd-Frank to mean an entity acting as an agent of a covered person (financial service provider) with a customer facing role. And amend the definition of service provider within Dodd-Frank to reflect the same.
119. Jeff	? further discussion	Focus CFPB supervisory exam activity on the determination of whether or not an examined entity is in compliance with statutory provisions and end the practice of reviewing, assessing, and grading an examined entities compliance management system except for situations where federal statute requires a compliance management system.
128.	Not discussed	Supervision consistency The "Appeal Bill" or other questions regarding faster, more transparent, and more consistent resolution of supervision disputes, i.e., due process for supervision. **Jean: Needs clarification. CFPB adopted appeals process in 2015.** (member idea)
129. Ross	Not discussed	Research economies of scale in supervision compliance. (member idea)
130. Ross	Not discussed	Conduct marginal cost/benefit analysis for supervision to inform supervision v enforcement choices and resource allocation. (member idea)
	2. Regulatory Principles	
120.	? further discussion	Improve clarity of CFPB created regulations so terms are defined consistently across different regulations (consistent with statutes) and simplify the regulations for ease of interpretation, application, and compliance. Example: 'days' vs. 'business days.'
	3. Bureau Reorganization	
3.	? further discussion	The Bureau should consider reorganizing around markets instead of tools. Rather than organizing around group or activity functions, the Bureau could reorganize like the FTC around market expertise (e.g., Offices of Mortgages, Credit Reporting, Debt Collection, Auto Finance, Installment Lending, Student Lending). These offices would have responsibility for any market-specific rulemakings, and the multi-disciplinary staff (attorneys, market analysts, research staff, and examiners) would have expertise in the market. FLAG for including competition mandate here.

	4. Credit Unions	
24. Ashlie	? further discussion	**Congress/NCUA should allow all credit union charter types to serve underserved areas. Currently, only one type of credit union, multiple common bond-chartered credit unions, can serve underserved communities outside their common bond membership. Jean recommends dropping. Not our issue or area of expertise. If law change is needed, NCUA should advocate; if reg change is needed, NCUA should change regulation. *See* 12 USC § 1759(c)(2), allowing a multiple common-bond CU to serve in "investment area" (e.g., impoverished or high unemployment area) that is also underserved suggesting rule is based on statute).**
	5. Disclosures	
34. Jean	? further discussion	Congress needs to completely re-think E-Sign. Essentially repeal it and replace with rule-writing authority to Bureau or other agencies for electronic disclosures generally. [Need to consider how to implement replacement of E-Sign as it also covers non-Bureau rules.] **Jean recommends accepting, subject to approval of final drafting by Jean/Alex and informed by pending legislation to modernize ESIGN, which seems consistent with our goals.**
127.	? further discussion	Combination of (personalized) Just-in-time disclosures with license requirements for certain securities trades or certain consumers deemed to be vulnerable. **[AT: Query whether Bureau has jurisdiction over this activity. See 12 U.S.C. § 5481(a)(viii).]** (member)
	6. Faster Payments	
42.	? further discussion	The Bureau should update Regulation CC on expedited funds availability as appropriate to reflect improvements in the technology for faster check clearing. **Jean recommends accepting; Reg. CC allows up to 5 or 6 business days following date of deposit of a nonlocal check; this rule was adopted in 1990. *See* 12 CFR 229.12 (only inflation adjustments have been made since).**
	7. Fintech Charters (Inclusion and Innovation)	
120.	? further discussion	Congress should consider allowing the CFPB to issue licenses to non-depository institutions, enabling them to export the regulatory requirements of their home states. Alternatively, Congress support the OCC's chartering of fintechs. Preamble points: The creation of the CFPB creates a unique agency to regulate entities that are interstate in their activities. The opportunities for innovation and financial inclusion are large; therefore the Taskforce recommends licensure of non-depository institutions, allowing for the exportation of home state law and consumer protection regulatory regime, [pending evaluation of the consumer protection regime by the Bureau.] The Bureau should set a nationwide standard that comes with a nationwide license or charter for non-depository institutions. Bureau has exception from state licensing requirements if the state law meets the Bureau's standards, in which case the Bureau permits the state license to be exported nationwide. **Jean: Let's discuss this. I agree with the national charter allowing exportation of rates, consistent with the privileges of banks, but not the ability of the Bureau to set standards. After all, banks do not need to satisfy the OCC or anyone else that SD's**

		consumer protection laws and lack of a rate cap, for example, are sufficient in their view of what is good for consumers. I favor Howard's approach of allowing state laws to control the requirements of institutions chartered in their states. Citibank has set up its credit card operations in SD and can export SD's laws, under *Marquette*. The issue, I think, is whether fintechs should be held to a different and higher standard. To the extent that consumers benefit from competition, as I think we all do believe, why should that competition be limited to competition among banks but not non-banks?
	8. Discrimination in Auto Finance	
76. Skip pending decision on auto dealers, other retail sellers, and MOUs	? further discussion	The Bureau should address any future concerns about credit discrimination in pricing by auto dealers through its ECOA enforcement powers with dealerships under its jurisdiction, rather than through ill-considered enforcement actions against the banks and other creditors that take assignment of these contracts. In evaluating a dealership's compliance with the ECOA, the Bureau should take into account the many legitimate non-discriminatory reasons a dealer may vary the APR over the assignee's wholesale buy rate, such a consumer's negotiation for a more competitive rate, the requirements of a manufacturer's promotional rate offering, the additional time needed to find financing for some applicants, and similar non-discriminatory business reasons. The Bureau and the Federal Reserve Board should amend the Commentary to Regulation B to provide that good faith implementation of the Fair Credit Compliance Program or comparable program constitutes one method of preventing discrimination in pricing credit offered by retail sellers.
78.	Not discussed	The Bureau should research what rules would assist consumers in the car dealership space (REF: 6c)
	9. Educational Programming	
37. Greg	Not discussed	Establish educational pilot programs with specific, objective goals in mind (increased savings, reduction of foreclosures, reduced defaults, etc). Develop multiple pilots/approach in localities of like demographics, establish baselines against the objective goals, and length of pilot. At the end of the pilot measure which educational programs are the most successful. The hopes are that this would create competition among Bureau staff to develop good educational programs while also helping the Bureau to better understand the effectiveness of various educational efforts. (staff)
38. Greg	Not discussed	Consider recommending a National Youth Financial Fitness Program modeled after the Presidential Youth Physical Fitness Program. This is a fresh idea that could include a partnership of government promotion (and existing resources), private participation on a Board or Council, and would be voluntary throughout the country but exciting for kids, schools and families. This would be a voluntary program that offers educators and families free access to courses and assessments for youth fitness at appropriate levels and motivational recognition (medals and certificates of completion) to empower students to adopt and maintain financial well-being.
133.	Not discussed	Work with Financial Institutions to pilot consumer financial education tools to customers as currently FIs are reluctant to engage in financial education for fear of being identified as inappropriate sales attempts or misleading information. If FIs can work with regulators to approve of financial education materials or programming, this information can be shared to more consumers.

9. Greg	Not discussed	Placeholder for consumer education proposal from Greg.
	10. Alternative Data	
66.	Not discussed	Research the use of alternative data in credit decisions using credit card decisions to see if it is effective in determining credit risk. (Federal engagement)
	11. Preemption	
68.	Not discussed	Consider using federal rules that preempt local laws to make the mortgage process more consumer friendly especially as to the efficiency of electronic transactions. (Federal engagement)
	12. Mortgages	
73.	Not discussed	Consider ways to lower closing costs for lower-amount single-family home purchase loans. (Federal engagement)
	13. RESPA	
103. Howard	Not discussed	The Bureau (Congress?) should allow mortgage lenders to offer bundled and guaranteed closing cost packages.
104. Howard	Not discussed	The Bureau should repeal the Bulletin on Marketing Servicing Agreements.
	14. Savings Accounts	
125.	Not discussed	The Bureau should permanently repeal the 6-transaction limit for savings accounts.
	15. Old Folks	
116.	Not discussed	The Bureau should, as part of its work with the Office of Older Americans (?), conduct research on the use of credit by aging demographics.
	16. State Regulatory Schemes	
109.	Not discussed	States should drop the cumbersome and antiquated laws for licensing and regulating consumer financial service providers in favor of the UCCC, this allows more uniformity across states and reduces compliance costs for interstate credit grantors.
	17. Inclusion	
57.	Not discussed	Placeholder for Congressional reform of CARD Act regarding credit cards to consumers under age 21.
58.	Not discussed	Placeholder for subprime credit cards.