



May 29, 2018

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

Via email: FederalRegisterComments@cfpb.gov

RE: *Request for Information, CFPB External Engagement/Docket No. CFPB-2018-0005*

Dear Ms. Jackson,

Appleseed wishes to provide the following comment in response to the Request for Information (RFI) regarding the Consumer Financial Protection Bureau's (CFPB) External Engagements.

Appleseed has been honored to support the Consumer Bureau's robust external engagement program and participate in meetings and events over the past six years.

Appleseed and some of our centers have participated in the CFPB's advisory board meetings, field hearings, town-halls, meetings with stakeholders, speaking engagements, and conferences. We have directed individuals to the CFPB consumer complaints system and its "Tell Your Story" website. We know first-hand the power of each of these external engagement tools and we whole-heartedly urge and endorse their continuation and expansion:

- Alabama Appleseed co-hosted a payday hearing in Birmingham, AL, with Director Richard Cordray and his senior team.
- Appleseed and Texas Appleseed joined Dallas and Houston hearings and town-halls.
- Ann Baddour, Texas Appleseed senior policy analyst, serves as chair of the CFPB Community Advisory Board formed pursuant to the Dodd-Frank Act.
- Appleseed provided information and opinions to the Ombudsman Office.

"External engagement" – open and ongoing, robust communication with external stakeholders – is vital to all the functions that Congress assigned the CFPB: supervision, enforcement, financial education, addressing consumer complaints, monitoring markets to identify risks to consumers, and issuing rules to implement consumer protection law.

Appleseed enthusiastically supports such engagement, and especially encourages the CFPB to continue the practice of face to face conversations by the director and his or her team with

individual consumers. Individuals can convey to the CFPB leadership where they experience financial difficulties, how they are treated, and what remedies actually work for them. We urge CFPB leadership, as well as staff across all levels of the agency, to dedicate time to engaging directly with consumers and their representatives, as well as other stakeholders.

Robust external engagement ensures that the CFPB can share information with consumers, industry participants, and the wide range of other entities interested in and affected by the CFPB's actions. Moreover, external engagement ensures that the CFPB's policymakers, consumer educators, attorneys, examiners, and other staff have the information they need to understand and appropriately address consumers' needs and experiences. Any engagement forum, from a one-on-one conversation to a large town-hall meeting to a social media exchange, can provide the CFPB with invaluable information about how the markets for consumer financial products and services operate and the risks that consumers may face, and this information is vital for the CFPB to develop and target its initiatives appropriately.

We urge continuation of the external engagement practices of the CFPB's first six years:

- Continue and expand the schedule of frequent and geographically diverse town-halls, field hearings and roundtables to engage the public.
- Attract diverse participants, including immigrants and low-income individuals, and facilitate their participation.
- Conduct topic-focused public events far in advance of proposed regulatory action: consumer debt, overdraft and fees, issues affecting military personnel, elder abuse, small business lending and similar topics.
- Retain CFPB complaint tool with public access to the data. Since its inception, the CFPB has collected more than 1 million consumer complaints.¹ They also provide important information to the CFPB and to the public, as the CFPB publishes complaint data that can help other consumers learn about consumer financial products and potential risks.
- Retain current "Tell Your Story" platform and develop new expanded customer access techniques so that consumers know about this platform and can use it, even if they are not tech-savvy.
- Expand small group meetings and conversations and appearances with expanded time for public to speak.
- Preserve and expand the CFPB's efforts to engage with consumers in languages other than English with both print and audio accessibility in these languages. Please do not reduce the number of languages in which public information is provided.
- Develop new mechanisms to reach a diverse set of stakeholders.
- Expand the agency's existing engagement practices and continue developing and refining ways to analyze and use the information that the CFPB receives through its external engagements.

¹ [22] *Consumer Complaint Data Base*, Consumer Financial Protection CFPB (website visited April 26, 2018) <https://www.consumerfinance.gov/data-research/consumer-complaints/>

- Explore new mechanisms to engage with individual consumers. For example, the CFPB could organize “listening sessions,” which would allow consumers to engage in open ended discussions about financial services concerns with senior CFPB staff.

Public engagement has been and should remain a hallmark of the CFPB. Congress created this agency to protect consumers, and this consumer protection mandate requires a pro-active posture of public engagement.

Sincerely,

Annette LoVoi
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