

Banking Policy Analysis Archive

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- Summary of New Rules for College Prepaid and Bank Accounts, Aug. 4, 2016
- Report and Press Release: Paper Statements: An Important Consumer Protection, March 2016

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- Report and Press Release: Account Screening Consumer Reporting Agencies Impede Access for Millions (Cities for Financial Empowerment Fund, NCLC and Bank On), October 2015
- Consumer comments on Fed proposal to adopt a same day ACH service, July 2, 2015
- Department of Education Proposal Will Protect Students from High Fee Campus Prepaid and Debit Cards, May 15, 2015
- EGRPRA comments on Check Hold Times (Reg CC) and CRA, May 14, 2015.
- Consumer comments to CFPB on safe student accounts, Mar. 30, 2015

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- Policy Brief: Introduction to Account Screening Consumer Reporting Agencies, October 2014
- Coalition letter to regulators on responsibilities of consumers' banks (RDFIs) re stopping unauthorized charges and closing accounts, Sept. 29, 2014.
- Banking Regulators: Banks should stop unauthorized debits from customer accounts, Sept. 29, 2014
- Debt Collection: Groups Applaud New Guidelines for Banks Selling Consumer Debt, Aug. 12, 2014
- Letter to House of Representatives supporting Operation Choke Point and other work against payment fraud, July 15, 2014
- Testimony of Lauren Saunders before the Financial Institutions and Consumer Credit Subcommittee of the House Financial Services Committee on Examining Regulatory Relief Proposals for Community Financial Institutions, Part II (July 15, 2014), discussing support for Operation Choke Point and opposition to H.R. 4986 (Luetkemeyer), July 15, 2014
- Comments to HHS on restrictions on direct deposit of TANF, May 7, 2014
- Letter to DOJ applauding work against payment fraud (including illegal payday payments), Jan. 14, 2014

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- Comments to FTC on proposed amendments to Telemarketing Sales Rule banning use of remotely created checks and other payment instruments, Aug. 2, 2013.
- Comments supporting collection of data on overdraft, monthly and ATM fees, May 6, 2013
- Comments urging Fed to ban remotely created checks, Dec. 13, 2013

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

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- Comments on the Treasury Department's proposal to mandate all electronic deposits by 2013, August 16, 2010
- Letter in Support of Freedom and Mobility in Consumer Banking Act (Miller), July 27, 2010
- Comments to Treasury Proposed Rule on Garnishment of Federal Benefit Payments, June 18, 2010
- Comments to the FDIC re: Basic Checking and Savings Accounts, June 7, 2010
- Issue Brief: Features of a Safe Basic Banking or Prepaid Card Account, December 2010

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- Comments to the Social Security Administration Regarding the Use of Master and Sub Accounts and Other Account Arrangements for the Payment of Benefits Docket No. SSA 2008-0023, June 20, 2008
- Testimony re Protecting Social Security Benefits from Predatory Lending and Other Harmful Financial Institution Practices, June 24, 2008

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- Testimony before House Financial Services Committee regarding on Accelerating Loan Modifications, Improving Foreclosure Prevention, and Enhancing Enforcement, December 2007
- Comments to the Federal Regulators on the InterAgency Guidance on Exempt Benefits, November 27, 2007
- Comments of the NCLC and NACA Regarding Advance Notice of Proposed Rulemaking Relating to Unfair or Deceptive Acts or Practices, November 6, 2007
- Testimony before the Subcommittee on Housing and Community Opportunity regarding Foreclosure Prevention and Intervention: The Importance of Loss Mitigation Strategies in Keeping Families in Their Homes, November 2007
- Letter to Governors regarding Early Disclosures for Non-purchase Money Loans, November 2007
- Letter by Coalition Opposing H.R. 3915, November 2007
- Analysis of H.R. 3915—as passed out of the House Financial Services Committee, November 2007
- Comments of the NCLC and NACA Regarding Advance Notice of Proposed Rulemaking Relating to Unfair or Deceptive Acts or Practices, November 2007
- Comments regarding the Proposed Illustrations of Consumer Information for Subprime Mortgage Lending, October 2007
- Frozen Out: A Review of Bank Treatment of Social Security Benefits, Testimony before the Committee on Finance and Appendices to Testimony, September 20, 2007
- Comments to the Board of Governors of the Federal Reserve System regarding the Board's Authority under HOEPA to Prohibit Unfair Acts or Practices in Connection with Mortgage Lending, August 2007
- Group Letter to Federal Reserve Board on HOEPA Authority, August 2007
- Letter supporting the Homeownership Protection and Enhancement Act ("HOPE Act") of 2007, July 2007
- Comments to the Commonwealth of Massachusetts Office of the Attorney General regarding Mortgage Lenders and Mortgage Brokers, June 28, 2007 PDF 67KB
- Letter Supporting Borrower's Protection Act of 2007, June 25, 2007 PDF 13KB
- Coalition Letter to House Financial Services Committee on Predatory Mortgage Lending, May 21, 2007 PDF 26KB

- Comments to the Office of the Comptroller of the Currency to Federal Banking Regulators regarding Proposed Statement on Subprime Mortgage Lending, May 2007
- Letter to House Financial Services Committee Leaders Supporting Enhanced Lending Duties under FHA, May 2007
- Letter to Banking Regulators regarding the Guidance on Nontraditional Mortgage Product Risk, February 2007
- Letter to Senate Regarding Inclusion of Hybrid ARMs in Interagency Guidance on Non-Traditional Mortgages, February 2007
- Response to MBA Policy Paper on Suitability, February 2007
- Letter to the Financial Services Committee regarding the Accessibility of FHA Programs, January 2007

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- Testimony by National Consumer Law Center and Consumer Federation of America Regarding Non-Traditional Mortgage Products, September 2006
- Comments to the Federal Reserve Board regarding Home Equity Lending Market, August 2006
- Letter to the Appropriations Committee re markup of the HUD Appropriations bill, July 2006
- Testimony of J. Robert Hunter before the House Committee on Financial Services Subcommittee regarding Title Insurance Cost and Competition, April 2006
- Letter commenting on RESPA reform, April 2006
- Comments to the federal banking regulators regarding nontraditional mortgages, March 2006
- Letter to FRB re ARM Disclosures, January 2006

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- Letter in Support the “Preservation of Federalism in Banking Act”, July 2005
- Point by Point Response To Ney-Kanjorski Predatory Lending Bill, April 2005
- Comments to the Massachusetts Division of Banks regarding 209 CMR §§ 32.32, 34, 40: Predatory Home Loan Practices, March 2005
- Letter to Chairman Oxley and Ranking Member Frank regarding predatory lending in the subprime mortgage market, February 2005

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- Letter to Chairman Oxley of House Financial Services Committee: Foreclosures Are Escalating, November 2003
- Testimony to the Subcommittee on Housing and Community Opportunity and Subcommittee on Financial Institutions and Consumer Credit on Protecting Homeowners: Preventing Abusive Lending While Preserving Access to Credit, November 2003
- Comments on Community Reinvestment Act Regulations, April 2003
- Testimony to the Financial Services Committee Subcommittee on Housing and Community Opportunity re HUD’s Proposal to Reform RESPA, February 2003

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Comments on Proposed RESPA Rule to Improve Process of Obtaining Mortgages to Reduce Settlement Costs, November 2002

Letter to NCCUSL Commissioners Opposing Uniform Nonjudicial Foreclosure Act, June 2002

Letter to President of NCCUSL, June 30, 2002

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Model State Statute: Home Loan Protection Act - A, November 2001

Comments: HUD Opinion Will Cost Homeowners Millions in Kickbacks, October 2001

Testimony to the Senate Committee on Banking, Housing and Urban Affairs regarding the Increase in Predatory Lending and Appropriate Remedial Actions, July 2001

Letter to HUD General Counsel Richard Hauser regarding HUD's Response to Yield Spread Litigation, July 2001

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Testimony re Amendments to 209 CMR §§ 32.32, 42, 40 High Cost Mortgage Loan Provisions in Massachusetts, October 2000

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Testimony regarding H.R. 1362 FINANCIAL INSTITUTIONS REGULATORY RELIEF ACT OF 1995,
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ACT, May 1995