



CENTER FOR CAPITAL MARKETS
COMPETITIVENESS

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Ms. Davida Farrar
Counsel
Consumer Education and Engagement Division
Bureau of Consumer Financial Protection
1700 G Street, NW
Washington, DC 20552

**Re: Request for Information Regarding Bureau Financial Education
Programs, Docket No. CFPB-2018-0015**

Dear Ms. Farrar:

The U.S. Chamber of Commerce (“the Chamber”) is the world’s largest business federation, representing the interests of more than three million companies of every size, sector, and region. The Chamber created the Center for Capital Markets Competitiveness (“CCMC”) to promote a modern and effective regulatory structure for capital markets to fully function in a 21st century economy. Strong and appropriate consumer protections are an important and necessary component of efficient capital markets.

We appreciate the opportunity to respond to the Bureau of Consumer Financial Protection’s (“the Bureau”) Request for Information (“RFI”) regarding the Bureau’s financial education programs. We particularly stress two principles for the Bureau as it considers how to best structure its consumer education programs.

- Prioritize consumer financial education; and
- Collaborate with various stakeholders to develop and implement education programs.

(1) Prioritize Consumer Financial Education.

When Congress created the Bureau, it identified six “primary functions.” It is no coincidence that the first in this list of priorities is to “conduct[] financial education programs.”¹ Congress positioned financial education as the cornerstone for the Bureau’s mission because it recognized that an informed consumer is the most financially successful consumer.

Previous leadership at the Bureau made available various types of consumer education materials.² However, we believe there is an opportunity for the new leadership to go farther by creating a holistic consumer education platform that includes other agencies, the private sector, and local institutions. A comprehensive strategy will better assist consumers by providing a one stop shop for education materials, while also helping the Bureau to enhance consumer protection by giving them the tools to make more informed decisions.

(2) Collaborate With Stakeholders To Develop And Implement Education Programs.

The Bureau should embrace the opportunity to work with stakeholders across the spectrum to tackle the challenging task of establishing strong consumer financial education throughout our country.

a. Federal Government Partnerships

The Bureau should streamline resources between agencies to increase the effectiveness of getting financial education to consumers. The Bureau should focus efforts on researching and publishing ways to make resources, tools, and strategies more effective in general. The Bureau should create standardized materials in conjunction with the other agencies and industry to decrease consumer confusion.

The Bureau should start by collaborating with its sister agencies, such as the U.S. Department of Treasury and its Financial Literacy and Education Commission,³ the prudential banking agencies, the Federal Trade Commission, and the Department

¹ 12 U.S.C. § 5511(c)(1).

² See, e.g., CFPB, *Effective Financial Education: Five Principles and How to Use Them* (June 2017).

³ U.S. Dep’t of the Treasury, Financial Literacy and Education Commission, <https://www.treasury.gov/resource-center/financial-education/Pages/commission-index.aspx>.

of Education. While many of these agencies already produce education tools and hold roundtables, the fragmented regulatory structure is confusing for consumers who are looking for information. We ask the Bureau to collaborate with industry when creating educational materials and hosting discussions so valuable insight from practitioners can be incorporated.

The Bureau should also partner with the Small Business Administration to produce information if the Bureau produces educational materials on how consumer products are used in small business creation. Moreover, the Bureau's Office of Servicemembers should partner with the Department of Defense for their expert knowledge on the unique needs of our hardworking service members.

b. Industry Partnership

When pursuing consumer education, the Bureau should leverage insight from financial institutions based on the relationships these companies have with their customers. Financial institutions are leading the charge in financial education to better serve their customers. Institutions have created different academies, workshops, and educational materials to help their customers understand the products and services they offer, as well as the overarching financial services landscape.

Since consumers are already actively engaging with their financial institution, the Bureau should partner with these institutions to create materials and courses that are more likely to reach the consumers both parties are trying to help. Partnerships can come in many forms – from local events to co-branded education tools. The Chamber stands ready to partner with the Bureau on this important work.

c. Local and Community Outreach

The Bureau should partner with local community organizations to reach consumers who may not be comfortable going into a bank or reaching out to a governmental agency. For some consumers, his or her local charity organization, community outreach institution, or place of worship is the trusted organization where they receive their information. It would be helpful to these organizations if the federal government could provide the standardized, vetted materials discussed above.

(3) Develop Strategies for Effectively Conveying Consumer Education.

Consumers are faced with an overflow of financial information, which is why it is critical that the relevant information is conveyed to consumers in the most effective way possible.

- a. *Financial Information the Bureau should Address:* The Bureau should use the complaint database to best ascertain the areas where consumers need the most education. For these reasons, we urge the Bureau to focus on education about savings and the important of emergency savings, planning/budgeting, debt relief/consolidation, and building credit.
- b. *Delivery channels and technology the Bureau should use to provide consumer education:* Since the Bureau is still a relatively new agency, the Bureau should partner with sister agencies and the private sector to make its efforts known. Once the partnership has been established, the Bureau should work with its partners to provide information through pamphlets to local organizations, establish roundtables throughout the country, and work with stakeholders to create agreed upon material to put on the stakeholders' websites as well as the Bureau's website.
- c. *How the Bureau should measure the success of its financial education programs:* The Bureau should monitor usage, reach, impact measured over time, confidence and attitudinal/intent indicators from consumers.

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We thank you for the opportunity to submit these comments and would be happy to discuss these issues further.

Sincerely,



Tom Quadman