



NATIONAL FOUNDATION FOR
CREDIT COUNSELING

*Knowing the difference can
make all the difference.®*

2000 M Street, NW | Suite 505 | Washington, DC 20036

February 28, 2014

Christopher Banks
Consumer Financial Protection Bureau
1700 G Street, NW 6111 E-B
Washington, DC 20552

RE: The Nomination of Susan C. Keating to the CFPB Consumer Advisory Board

Dear Mr. Banks:

We, the undersigned, respectfully submit the name of Susan C. Keating to be a member of the Consumer Advisory Board of the Consumer Financial Protection Bureau. Ms. Keating is the President and CEO of the National Foundation for Credit Counseling (“NFCC”). Since its founding in 1951, the NFCC has been the nation’s largest and longest serving network of nonprofit financial and housing counseling and education agencies, with more than 80 members operating more than 600 offices in communities across the country. All NFCC Member Agencies are 501(c)(3) organizations under the Internal Revenue Code, and one of the long-standing tenets of the NFCC is to provide service to consumers without regard to their ability to pay any fee. Since the financial crisis hit in 2008, NFCC Member Agencies have provided financial counseling and education to millions of consumers in an effort to help them manage their debts and to take control of their finances. .

Since the establishment of the CFPB, the NFCC has strongly supported the Bureau’s mission. We have participated in many strategic discussions and roundtables at the Bureau’s invitation and have had a chance to actively engage with many representatives from the Bureau’s leadership team, including Holly Petraeus, Gail Hillebrand, and Camille Busette. Ms. Keating recently spoke with Director Cordray at one of the Financial Literacy and Education Commission meetings, and the Director reiterated his strong support of the work that the NFCC does, and he asked how the CFPB and NFCC could work together more closely in the future.

We believe Ms. Keating’s appointment to the Consumer Advisory Board would be an excellent opportunity to enhance this relationship. Indeed, there are a number of important issues facing American consumers that both the NFCC and CFPB are actively

working on. Ms. Keating's position on the Consumer Advisory Board would allow her to contribute her unique perspective and experience in each of these areas to help inform the CFPB as it considers how to address critical challenges across consumers' financial landscape:

- Student Loans: we are implementing programs to improve the quality of borrower education and to provide counseling to help borrowers understand and manage their repayment options.
- Sharpen Your Financial Focus™ Initiative: The NFCC, leading financial institutions, and other national partners have joined forces to create a nationally-driven, grassroots-supported, three-year initiative designed to promote financial awareness, and to provide consumers with the education and tools necessary to facilitate financial capability and foster better financial behaviors. This initiative was launched in September 2013. To date, the NFCC has received commitments in excess of \$13 million for this initiative, and our participating agencies have served over 20,000 clients. We also partnered with Ohio State University to conduct a longitudinal study to track the outcomes of the study according to the following metrics: overall impact of the initiative, consumer confidence, consumer financial knowledge and behaviors.
- Housing Counseling: As one of the largest HUD and NFMC national intermediaries, the NFCC provides critical pre-purchase and foreclosure avoidance counseling to millions of consumers every year. We are also actively working with industry partners, regulatory agencies, and legislative staff to explore new, sustainable ways to integrate housing counseling into the mortgage origination process, and to expand access to credit to many more prospective homeowners.
- Financial Education for members of the Military: Holly Petraeus spoke at our 2013 Annual Leader's Conference, and we (along with other lead partners) submitted a bid for the CFPB's forthcoming Integrating Financial Coaching into Service Delivery for Transitioning Veterans and Economically Vulnerable Consumers project. Our financial professionals work with tens of thousands of veterans every year, and we are constantly exploring new ways to help this important community.
- Financial Coaching: The NFCC has a number of active pilot programs in place that build on our longstanding expertise in consumer counseling by integrating core coaching concepts of client-driven goals, extended engagement, and proactive mentoring. To date, these programs have resulted in significant gains in saving and credit scores, as well as substantial improvements in first time home buyer preparation. As we embark on a period of strategic planning for the NFCC, we will be looking for ways to integrate coaching concepts into our core service delivery areas.

Ms. Keating has a wealth of experience from her distinguished career in financial services and consumer advocacy that she would bring with her as a member of the Consumer Advisory Board.

When Ms. Keating became President and CEO of the NFCC in early 2004, the nonprofit credit counseling sector was in disarray. With the expansion of consumer credit over the previous decade, new entrants had come into the sector, many of which improperly posed as nonprofit entities and took advantage of vulnerable consumers. Ms. Keating and the NFCC took an active role in supporting and advancing new IRS rules to protect consumers from abusive new entrants' practices, and led the effort to adopt new consumer protections as part of the Internal Revenue Code, which are now Section 501(q) of the Code. As a result of Ms. Keating's determined leadership, the NFCC maintained its high standards for consumer services and consumer protections. After a lengthy investigation into the abusive practices of the new entrants in the sector, the Permanent Subcommittee on Investigations of the United States Senate issued its report, which praised Ms. Keating's position and the NFCC's standards, saying: "If applied throughout the industry, [the NFCC's] professional standards could significantly address the abusive practices identified in this Report." [U.S. Senate Report 109-55, April 2005, p. 32]

In response to the Bankruptcy Reform law of 2005, Ms. Keating and the NFCC worked closely with the Executive Office for United States Trustees of the Department of Justice to establish pre-filing counseling and pre-discharge financial education programs. Ms. Keating took the position that the role of the counselor is not to advocate for or against filing for bankruptcy, but to be an independent third party assisting consumers by making a thorough assessment of their financial situation; creating an understanding of their options and alternatives; and providing them with an understanding of the bankruptcy process. Today, Ms. Keating and the NFCC still see pre-filing counseling as akin to the important consumer disclosures made in connection with other financial services and products, and the role of the counselor as providing consumers with the information and education necessary to make a decision in their best interests.

In 2008, Ms. Keating forged an ongoing relationship with the Military OneSource program for the provision of financial counseling services to military service members. That, as well as a relationship with the Department of Defense, has made the NFCC one of the largest providers of financial counseling and education to service members in military bases across the country.

When the housing and mortgage crisis emerged in 2008, Ms. Keating played an aggressive role in expanding the NFCC's housing and mortgage-related counseling to address consumer needs. Through Ms. Keating's efforts, the NFCC has become one of the largest housing counseling intermediaries providing services to consumers dealing with high-priced mortgages and struggling to keep their homes. In addition, Ms. Keating recognizes that if there had been a stronger emphasis on comprehensive financial counseling and education around housing in the past, we might have avoided or negated many aspects of the mortgage crisis. To that end, she and the NFCC are working to ensure broad access to pre-purchase counseling so that millions of American families can have access to safe, affordable housing credit as we move in to a new era in the housing market.

The NFCC is also the largest provider of counseling to senior citizens as required for Home Equity Conversion Mortgages, better known as Reverse Mortgages. Ms. Keating and the NFCC have worked directly with the AARP, NRMLA, NCOA and others to recognize and serve the special needs of seniors in this, and all other areas of their finances.

Prior to joining the NFCC, Ms. Keating spent 29 years in financial services and, during her tenure, was the highest ranking female CEO of a U.S. bank holding company. Ms. Keating also has a long history of serving on consumer-focused advisory bodies. She currently serves on Bank of America's National Consumer Advisory Council, and is a board member of the Council on Accreditation. She also participates in the Financial Regulation Reform Collaborative, a non-partisan group working to reform financial services and regulation. Previously, Ms. Keating served as a board member of the Baltimore Life Companies, and of the Financial Services Roundtable, on which she served as chair of the Consumer Issues Committee. In addition, she was the 2002 chairperson for the Alexis de Tocqueville Society of the United Way of Central Maryland. Additionally, she served as banking chair for the US Savings Bond National Volunteer Committee.

The real strength of Ms. Keating in her current role as President and CEO of the NFCC is her contagious passion for helping consumers dealing with day-to-day financial problems. She considers herself fortunate to be in a position to lead the effort to provide assistance and solutions to millions of consumers across the country. The core of those services are provided where they are most needed; in the areas of the country hardest hit by the mortgage crisis and in areas impacted by the economic downturn, including communities traditionally underserved by the financial sector.

With her experience in banking and as an active leader of the nation's largest network of nonprofit counseling agencies, Ms. Keating understands the complexity of issues faced by consumers and financial institutions, and the critical role of the Consumer Financial Protection Bureau. She has first-hand knowledge of the emerging trends and practices in the consumer financial markets. She is uniquely qualified to serve on the Consumer Advisory Board and would bring expertise to its considerations. Therefore, without hesitation or reservation, we nominate Susan C. Keating, President and CEO of the National Foundation for Credit Counseling, for appointment to the CFPB Consumer Advisory Board. We have ascertained Ms. Keating's approval of the submission of her nomination, as well as her willingness to serve on the Consumer Advisory Board. Ms. Keating's resume is attached.

Respectfully submitted,



Catherine A. Allen

Founder, Chairman and CEO

The Santa Fe Group

Santa Fe, NM

Founding CEO of BITS, a financial services consortium on technology and public policy
(1997-2007)



Robert L. Clarke

Senior Partner

Bracewell & Giuliani LLP

Houston, TX

Comptroller of the Currency of the United States (1985-1992)

Respectfully submitted,



Dr. Brady J. Deaton

Chancellor University of Missouri (retired)

Respectfully submitted,



Richard S. Levick

President & CEO

Levick Strategic Communications, LLC

Respectfully submitted,

2/21/2014

DAWN LOCKHART
PRESIDENT & CEO.



Dawn Lockhart
President & CEO
Family Foundations

Respectfully submitted,



Kevin Rhein
Executive Vice President, Card Services and Consumer Lending
Wells Fargo Bank

Respectfully submitted,



Susan Aulie
Sr. Director
CCCS of Duluth
424 W. Superior Street
Suite 600
Duluth, MN 55802