



## **COHEAO ANNUAL REPORT 2020**

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## Message from the President

As COHEAO enters its 40th year, we look back at all the organization has accomplished in four decades, but we also look forward to the great opportunities 2021 has in store.

2020 was a year like no other. It brought unique challenges to our industry unlike ever seen before. At the end of the first quarter of 2020, Colleges and Universities were closing campuses and sending students home to remotely finish the Spring term. Faculty and staff taught and worked from home, and third-party servicers converted to a nearly 100% virtual environment. The global pandemic slowed the American economy necessitating major COVID19 relief packages from Congress. Operational budgets at campuses across the nation reduced drastically, reflecting the loss of revenue. While this was going on, the high cost of higher education played out in the press as a significant campaign issue on both sides of the aisle in a very heated election season.

Despite the uncertain political environment of 2020, COHEAO continued to make significant strides in our Perkins ARC proposal's advocacy strategy with H.R. 8904 Perkins Access, Retention, Completion (ARC) Act. The bill was introduced by Representative Mark Pocan (D-WI) in December. The bill's introduction is the first step in a long-term effort to replace the expired legacy program. The organization helped guide the community through the uncertainty of applying COVID19 relief to our Perkins and HHS borrowers and changes to the FISAP report. We advised and guided Institutions through the Department of Education's start of mandated assignment of Federal Perkins loans two-years or more in default. COHEAO managed to explain to Congress the great forbearance options available already and keep the Perkins Loan program out of additional relief legislation, and we have gotten one step closer to ensuring schools receive an administrative cost allowance substitute.

Because the inability to travel and gather in person remained for the vast majority of the year, COHEAO found it necessary to cancel both the Spring and Fall Workshops. However, we did offer a full webinar series on topics that ranged from 1099T's, Building an Inclusive Campus Community, New CFPB Debt Collection Rules, and more.

Additionally, COHEAO continues to expand its focus on high priorities for campus student financial services, especially those involved in managing accounts receivables with our STAR Task Force. The Institutional Loan Task Force is doing tremendous work, focused on student-friendly loan programs, which many schools are considering expanding to replace Perkins Loans.

In the Fall of 2020, the COHEAO Board of Directors began a rebranding effort. This effort is to make sure the organization's priorities are aligned with those of our membership and the community and take steps to ensure our communication efforts, on-line and social media presence reflect COHEAO priorities. The Board identified our top three priorities in this effort; these priorities are 1.) creating and maintaining an expanded database of member contacts from various departments within each organization and develop a broader industry database of contacts for marketing and grassroots advocacy projects. 2.) creating a COHEAO Listserv for all members and institutions of higher education regardless of membership. The Listserv is intended to promote information sharing and provide assistance within the higher education

community on all topics within student financial services. 3.) Expand the organization's efforts in being a leader in Higher Education SFS training and education. The Board will continue in these efforts throughout 2021 and will add new tasks as necessary.

In 2021 the organization will continue to focus on our core priorities while identifying new ways in which COHEAO can support and advocate for all our members.

COHEAO Core Priorities:

- federal campus-based loans (Perkins, nursing, PCL, HHS, NFL)
- accounts receivable management,
- financial wellness,
- institutional loan best practices
- Telephone Communication Protection Act reform
- Consumer Finance Protection Bureau issue
- state laws

I want to thank the COHEAO Board of Directors, the staff of Bose Public Affairs Group and COHEAO's members for the collective efforts to achieve the COHEAO mission.

Mission:

Promote access to higher education through legislative advocacy of financial aid programs; to increase the efficient and cost-effective delivery, billing, and collection of higher education student financial assistance programs; to prepare and disseminate information to the public and governmental officials and agencies in furtherance of the purposes of the Coalition and to keep the membership apprised of said information, and to do all other things necessary and proper to carry out all these purposes.

Submitted by: Lori Hartung, COHEAO President

## **Treasurer's Report**

For the 2020 calendar year, the COHEAO financial statements reflect a net loss of \$1,000 on total revenue of \$167,000. The overall financial position remains strong and we begin 2021 with positive retained earnings of \$29,000.

The Board is focused on ensuring the continued advocacy efforts supporting initiatives relating to student funding and addressing issues important to both our campus institutional and commercial members. A key goal in 2021 will be working our Membership Committee to ensure that members remain engaged as we adjust to limitations relating to covid (including the transition to virtual conferences and meetings) and strive to maximize the impact of our advocacy programs supporting a wide range of initiatives.

The Board is also committed to ensuring that the financial position of the organization remains strong and will continue to be diligent in monitoring and adjusting expenses as needed in 2021.

Submitted By: Bob Frick, Treasurer

## Membership Report

The Membership Team for 2020 consisted of Membership Chair Nancy Lange; Institutional Membership Co-Chair Mary Beth Gloekler; Commercial Membership Co-Chair Denyc Perez, and Development Membership Co-Chair Joe Weglarz.

2020 proved to be quite a challenging year for membership. With COVID-19 ramping up right before the annual institutional membership cycle, several institutional members were unable to renew due to budget constraints. We also saw a decrease in the commercial/organizational membership due to the wind-down of the Perkins Loan Program and budget concerns. The Membership Committee continues to work with Bose Public Affairs staff and the Internal Operations Team to establish a strong database of its members. Our goal is to recruit new members while retaining our current memberships. We continue to strive to be the “go-to” source for all aspects related to students including on-going campus-based loan programs, financial wellness, institutional loan programs and CFPB/TCPA information.

The committee and the Board continue to work on strategies to recruit non-traditional members outside of the Perkins community as well as continuing to monitor the climate of institutional and commercial membership to determine evolving interests and future target markets.

For many commercial members, the 2020 Annual COHEAO Conference in Washington, DC was the last travel event of 2020. This created an opportunity for COHEAO to explore alternative ways of presenting information to our members with many Zoom webinars offered throughout the year. We continue to offer a 10% discount to non-members who join COHEAO after attending one of our online events. The membership team continues to be involved in efforts to keep members engaged as we work with congressional members on alternatives to the Federal Perkins program, cancellation reimbursement to institutions and continued servicing cost relief for the higher education community.

<b>MEMBERSHIP</b>		
	<b><u>2019</u></b>	<b><u>2020</u></b>
Commercial/Organizational Membership:	39	31
Institutional Membership:	142	116

Submitted by Nancy Lange, Membership Chair

## Legislative Report

It was a challenging 2020 with COVID-19 and its effects on Perkins Loans and the University world. It was also a productive year for COHEAO as it forced us to look at various legislative initiatives and protecting the Perkins Loan program.

We saw various States including Colorado, New Jersey, New York, Washington DC, and Minnesota introduce legislation that would greatly impact the ability of universities to collect on student debt. The change in Administration put student loan debt at the forefront of the public debate. COHEAO has been actively monitoring and mobilizing in these states and in Washington DC to educate policymakers about the value of the Perkins Loan Program and the implications of public policy that make it difficult to collect student debt.

There was a tremendous amount of headway made during the 2020 Congressional Session in regard to Perkins Loans and the servicing of these accounts. When both the House and Senate went to a Democratic majority there was light at the end of the tunnel for potential legislative movement to protect the program. The retirement of Senator Lamar Alexander and a new Democratic majority will make 2021 an exciting year for legislative gains in our public policy initiatives. COHEAO is well positioned to be the public policy voice not just for Perkins Loans but also Financial Wellness and other Student Loan servicing initiatives.

The discussions about Student Debt forgiveness started in 2020 and will be a driving narrative for public policy into 2021. There has never been a more important time for COHEAO to galvanize its grassroots to make sure that elected officials and public policy decisionmakers are well equipped with the correct information to make informative decisions.

Submitted By: Robert Schueger, Legislation Chair

## Internal Operations

The following were the key initiatives for the Internal Operations Team in 2020:

### COHEAO Fundraiser

At the January 2020 COHEAO Annual Meeting in DC, we raised over \$3,000.00 for the COHEAO scholarship fund. These funds were raised through a Silent Auction; a Split the Pot Raffle and a

Scholarship Squares game. We thank all our attendees for their generous support of the COHEAO Scholarship Fund.

### **COHEAO Scholarships**

There were 17 eligible applications received during the 2020 scholarship process which was comparable to last year's numbers.

The scholarship committee was comprised of Karen Reddick-NCM, Nancy Lange- RMS, Jan Hnilica – Wheaton College, Rechelle Brown – Coast Professional, and Beth Gloekler- University of Dayton. Each reviewer received copies of the application along with an evaluation spreadsheet. The reviewers individually ranked each applicant and provided this information to Karen Reddick, who compiled the rankings. Scholarship winners were selected based on academic achievement, community service and future goals that include public service or benefit to the community.

The individuals awarded the 2020 COHEAO scholarships were as follows

- Jennifer Mack, University of Nebraska Omaha – Bruce Lopez Scholarship
- Gabriella Castillo, Manhattan College – COHEAO Scholarship
- Jenna Sizemore, University of Dayton – COHEAO Scholarship

Following the COHEAO By-Laws, we conducted the election process for the President and Vice President positions and solicited nominations for the Commercial Chair and appointed Chair positions.

### **Election/BOD Positions**

The following nominations were received:

President: 2

Vice President: 2

Commercial Chair: 4

Appointed Chair Positions: 24

Our primary COHEAO members voted, and the results were as follows:

President: Lori Hartung

Vice President: Jan Hnilica

Commercial Chair: Chris Stompanato

Chair Positions: **Internal Ops**  
Karen Reddick, Chair - Internal Operations  
Lottia Windham, Co-Chair - Financial Wellness

Michelle Hartmann, Co-Chair - Communications  
John Schwarm, Co-Chair - Support

Robert "BJ" Schuerger, Chair - Legislative  
Joe Weglarz - Co-Chair, Loan Task Force  
Bob Perrin - Co-Chair Regulatory, TCPA and CFPB Task Force

Nancy Lange - Chair - Membership  
Beth Gloekler - Co-Chair, Institutional Membership  
Christ Stompanato - Co-Chair, Commercial Membership  
James Garrant - Co-Chair, Support

Past President: Maria Livolsi

### **COHEAO New Board Member Guide**

The New Board Member Guide was updated in December 2019 for distribution to the new Board members.

### **Database**

The internal operations team took on a new project this year to develop a complete database for both membership and prospective members. This is an ongoing project that will ultimately create a robust list for marketing and advocacy

Submitted by: Karen Reddick - Chair, Internal Operations

## **Commercial Membership**

The Commercial Committee experienced turnover in 2020, with the chairman transitioning from Denyc Perez (General Revenue Corporation) to Chris Stompanato (ECSI) in September.

The COHEAO Commercial membership decreased to 31 in 2020 from 39 in 2019. This membership loss can largely be attributed to the effects of COVID-19 on many companies and their budgets. The legacy Perkins program continuing to wind-down is not helping, and from a budget standpoint it's easy for companies to eliminate memberships and the associated fees. The forecast for 2021 appears to continue this downward trend with the organization possibly being down to approximately 26 commercial members based on early estimates.

To continue to demonstrate value to commercial members in order to earn and maintain their support, the following has been initiated:

- A restructuring of the commercial member's section of the COHEAO website to include their company logos that link to their home pages. In discussions with Maria Livolsi who manages the website, it appears we are going to be able to move in this direction in the coming months. The COHEAO Annual Conference web pages created by Hopin offer a glimpse into what this might look like on the COHEAO site.
- A census of the commercial membership added a net 12 contacts from these companies to our database.



- COHEAO is undergoing a major rebranding effort that will include the addition of a COHEAO listserv, which commercial members can participate in. There are also efforts underway to redesign the COHEAO logo led by ConServe and ECSI's marketing departments.

The Commercial Committee:

- Serves as an advocate for COHEAO on legislative and regulatory issues
- Coordinates and supports grassroots initiatives across Institutional and Commercial communities
- Provides Commercial members with a voice to and from the association
- Arms all Commercial members with the intelligence necessary to remain current on legislative and regulatory issues that impact their constituents
- Provides avenues for Commercial members to influence the regulations that affect the industry
- Encourages an industry-wide evolution by providing support to Commercial members who then convey that knowledge and best practices to their Institutional networks

Submitted by: Chris Stompanato, Commercial Committee Chair

# COHEAO Task Force Reports



## COHEAO Achievement Program (CAP)

The CAPS (COHEAO Achievement Program) was created in 2011 to recognize the advancements of members in training and education through participation in COHEAO conferences, webinars, and other COHEAO sponsored events.

### 2020 Scholar Graduates

Joe Weglarz

### 2020 Cap Graduates

Divana Chan

Beth Gloeker

Connie Robinson

Sue Jaquish

Michelle Marcano

Bryan Howard

## Annual Report on Hill Visits

At the 2020 Annual Conference, COHEAO members visited over 25 congressional offices. Many of these Congressional members are working on the Senate Health Education Labor and Pension Committee and the House Education & Labor Committee. Our advocacy message was to promote COHEAO's 21<sup>st</sup> Century Perkins Loan proposal (now renamed, the Perkins ARC Loan) and the need for a replacement to the Administrative Cost Allowance (ACA).

Submitted By: Jan Hnilica, Member at Large

## Perkins Grass Roots Report

COHEAO started 2020 gathering for its annual conference in Washington DC, shortly after the swearing-in of the 116th Congress. On the last day of the event, our delegates had the opportunity to visit over twenty-four congressional offices. We promoted COHEAO's Perkins ARC (access, retention, completion) loan, and an Administrative Cost Allowance replacement for the legacy program. Additionally, we discussed the merits of the Department's new mandate of assigning Perkins loans 2-years or more past due. It was a successful day of Hill visits.

## Grassroots and Coronavirus

### **CARES Act and Student Loan Relief**

In an unlikely turn of events, the Corona virus pandemic became prevalent in March 2020, which shut down government, businesses, and schools for several months. Due to the emergency of this pandemic, this changed COHEAO's focus for the remainder of 2020. The focus shifted from advocating for a new campus-based loan program to advocating the issues surrounding the management of the current legacy program.

Congress passed the CARES ACT in March 2020. This legislation included the suspension of interest accrual and required payments on all Federally held student loans (i.e., Federal Direct, Department-held FFEL loans, and assigned Federal Perkins Loans). The legislation did not include campus-held Federal Perkins loans (or FFEL loans held by banks). This exclusion left many schools determining how to best serve their Perkins loan borrowers affected by the pandemic. COHEAO worked with the Department of Education to clarify what benefits institutions could apply to these loans to help their Perkins borrowers during these unusual times. Eventually, the Department issued guidance to institutions utilizing the CARES Act benefits and additional Department clearance to apply these benefits to Perkins loan borrowers. The Department guidance can be found here: <https://www.ed.gov/coronavirus?src=feature>

In the Summer of 2020, bills were introduced in Congress to wrap FFEL and Perkins Loans into the CARES Act benefits. The benefits would be applied retroactively to March 13, 2020. This retroactive application of benefits would cause considerable work and hardship for lending institution and their servicers to process. COHEAO ramped up our advocating efforts with Congressional staffers. Our message included four points:

- No legislation is needed since schools are already providing forbearance and other assistance to anyone who asks for it.
- Any legislation should not be retroactive and should not require that refunds be paid in cash to borrowers by schools, an administrative nightmare that would be extremely costly.
- Schools should be permitted to charge any costs associated with steps taken to service their Perkins funds, including costs of sending messages to borrowers and reporting.
- Outbound collection calls should be permitted, even if involuntary collection actions are suspended. These calls are beneficial to borrowers in the long run since they help work out arrangements to help resolve defaults, such as consolidation into a Direct Loan, which allows for income driven repayment.

We drove home the point that Perkins loan borrowers did not need these extra benefits since a limited number of borrowers were requesting assistance, and the current benefits of the loan program were enough to help the borrowers who needed it on a case-by-case basis. To provide solid statistics to back-up our message, COHEAO surveyed our community on how COVID19 affected higher education institutions and Perkins loan borrowers. The survey was sent to membership and other higher education organizations (i.e., NACUBO) to gather as many responses as possible, the survey results indicated that for most of the institutions only a tiny percent of Perkins borrowers requested assistance with their loan repayment. Those who needed assistance were provided loan benefits that were already part of the loan's promissory note. The survey results were shared with Congressional staff.

COHEAO successfully kept Federal Perkins Loans out of any additional COVID19 related legislation in 2020.

### **Perkins ARC Proposal**

Due to the pandemic, advocacy efforts for Perkins ARC were put on hold. It was clear that Congress would not pass HEA Reauthorization or any major education bill that the Perkins ARC proposal could be attached. On December 8, 2020, Representative Pocan did introduce H.R. 8904, Perkins Access, Completion, Retention Act. The purpose of introducing the bill late in the congressional calendar was to gather momentum for the new advocacy efforts in 2021.

### **Legacy Perkins Wind Down**

#### **Replacement for Administrative Cost Allowance**

This past year, COHEAO continued progress on restoring an equivalent payment to replace the Perkins Administrative Cost Allowance (ACA). For nearly two years, the organization has been working to ensure that our members would be compensated fairly for their servicing and loan management work. Despite provisions in the last two annual federal appropriations bills granting the U.S. Department of Education the authority to reimburse schools for their Perkins servicing work, the Department has declined to act. In the 21-22 Appropriations Bill new language was added to the House Managers Report. The language stated: *"Perkins Loan Program. -The agreement continues the authority for the Department to provide administrative cost allowances for IHEs servicing outstanding Perkins loans. The agreement is concerned that the Department has not utilized this authority. The agreement directs the Department to provide a report to the Committees outlining why this authority has not been used, the number of institutions eligible under this authority, and an assessment of the potential costs to the Student Aid Administration account should such authority be fully utilized."*

COHEAO was made aware that Congressional Staff requested from the Department the data they gathered on the 2019 FISAP. This data (the Perkins Loan servicing costs) was provided in the Fiscal Operations Part III, Section B, line item 12; "annual servicing costs paid with institutional funds during the 2019–20 award year for non-defaulted loans (do not include collection costs included in Section A, field 34.2)" The Department responded they had no such data. In early 2021 COHEAO requested the same data from the Department to learn only 34% of Perkins schools filing a FISAP completed the line item on the form. Efforts to educate Perkins Loan institutions on calculating those costs and amending their FISAP filing will be made in 2021.

#### **Department Requested Assignment of Perkins Loans**

In February 2020, the Department sent to Perkins institutions a letter informing them they had 90 days to assign all loans that were two (2) years or more past due or contact them to formulate a plan to assign those loans. This letter was sent to the fifty (50) Perkins institutions in which 75% or more of their loans were two years or more past due or higher. COHEAO continues to monitor this process and is encouraging schools to evaluate their Perkins loan portfolio:

- Review your past-due accounts
  - Continue collection efforts,
- and if they are uncollectable, assign these loans to the Department first.

Due to COVID19, the Department did not send out any additional letters to schools in 2020.

In December 2020, a few COHEAO Board members met with Bruce Honer (Bruce replaced Tamy Aberthany at FSA) and Cynthia Hammond, both from FSA, via a Zoom call. The purpose of the

conversation was to introduce the Organization and begin dialog regarding a variety of COHEAO concerns. Once such concern was the new assignment mandate. COHEAO explained mandating assignments at two years past due was not realistic as the loans can be much more collectible as they become older. Based on some COHEAO members' statistics, the sweet spot for collectability is around four to five years past due. We asked that the Department reconsider the two-year threshold and move it to five years past due.

### Department Publications

**2020-09-24:** <https://ifap.ed.gov/electronic-announcements/092420ReminderFISAPdueNov22020>

(Campus-Based) Subject: Reminder the deadline for submitting the Fiscal Operations Report for 2019-20 and the Application to Participate for 2021-22 (FISAP) for campus-based programs has been extended to Monday, November 2, 2020.

**2020-10-20:** <https://ifap.ed.gov/electronic-announcements/102020PerkinsLoanPrmRevFundDistriAssets2021ReimCancel>

(Campus-Based) Subject: Perkins Loan Program-Federal Perkins loan Revolving fund Distribution of Assets Timeline for 2020-21 and Reimbursement for Perkins loan Service Cancellations.

**2020-11-13:** <https://ifap.ed.gov/electronic-announcements/111320FedPerkinsLoanPrmCashonHandUpdatedueDec152020>

(Campus-Based) Subject: Federal Perkins Loan Program Cash on Hand Update due Dec. 15, 2020.

Submitted by: Lori Hartung, President and  
Jan Hnilica, Vice President

## **Consumer Financial Protection Bureau (CFPB)**

### **Background:**

Signed by President Barack Obama in 2010 as a response to the financial crisis that began in 2007, the Dodd Frank Wall Street Reform and Consumer Protection Act legislation was an attempt to provide additional oversight to the financial markets and expand protections for consumers. A new federal regulatory agency, "The Consumer Financial Protection Bureau (CFPB)" was created under the Dodd Frank Act as an autonomous bureau that receives funding directly from the Federal Reserve rather than through the normal appropriation process.

Designed as an independent bureau the CFPB is empowered to execute both supervision and enforcement authority. The CFPB'S original leadership structure provided for a single director appointed by the President and voted on by the Senate to serve a five (5) year term. Until recently the CFPB Director could only be terminated due to cause.

The CFPB'S authority to regulate encompasses the entire membership of The Coalition of Higher Education Assistance Organizations (COHEAO). As such COHEAO recognized the needs of the membership and organized the CFPB Task Force many years ago to advocate related objectives and provide educational programs to keep members abreast of regulatory changes. COHEAO'S advocacy is

unique in respect to the fact that the organization is one of few that balances higher education concerns in concert to issues related to student loan servicing and debt collection while formulating comments for submission to the CFPB.

2020 has been a year of review and adjustment in response to the COVID-19 pandemic. Conferences became virtual and visits to share information with Congressional members shifted from personal meetings to Zoom, Teams, as well as other online products. Despite continuous interruptions because of COVID-19, during 2020 the CFPB fulfilled their long-term objective of modernizing the debt collection rules and continued to announce additional enforcement actions throughout the year. Details on how these accomplishments as well as other events during 2020 shaped the CFPB and the entities that the bureau regulates are summarized below:

### Year 2020

#### United States Supreme Court Issued A Ruling For The Case Of Seila Law v. Consumer Financial Protection Bureau

The Dodd Frank Act prevented the CFPB Director from being removed from his/her position unless it was determined that the Director's actions warranted removal due to "inefficiency, neglect of duty, or malfeasance in office." Unlike most other federal agencies, the Director of the CFPB was shielded from any "at will" political/administrative action that could potentially force removal from the position.

The case began when the Seila Law firm was under investigation and the CFPB requested additional documents. The law firm decided to challenge the authority of the CFPB'S request arguing that the structure of the CFPB was unconstitutional because the agency was governed under a single director with substantial power and limited to removal unless "cause" was proven. Because the CFPB'S structure should be considered unconstitutional the Bureau did not have the authority to request documents.

The case progressed to the U.S. Court of Appeals for the 9<sup>th</sup> Circuit who rendered a decision in June that the restrictions to remove the CFPB Director was not unconstitutional. In response to the 9<sup>th</sup> Circuit ruling the Seila Law firm appealed to the U.S. Supreme Court. Rather than defend their structure, the CFPB essentially aligned themselves with the Seila position forcing the Supreme Court Justices to appoint Paul Clement (retired U.S Solicitor General) to argue the decision made by the 9<sup>th</sup> Circuit.

Although the Supreme Court partially sided with Seila by agreeing that the governing structure of the CFPB was unconstitutional, the Justices determined that the powers given to the CFPB by the Dodd-Frank Act were constitutional and the rest of the law would remain viable.

Whether one supports the decision or not, the ruling handed down by the Supreme Court is impactful considering that as a result of the recent Presidential election a new administration will take office in January of 2021. Most observers expect that the new administration will replace Director Kraninger and nominate a new leader for the CFPB. The new Director is projected to focus on expanding oversight in contrast to the claims currently being levied towards the agency that , if the Supreme Court had not ruled as they did, the current Director Kraninger (nominated by President Trump) would still have three additional years to serve in that capacity before her term expired (5-years).

### **Final Debt Collection Rules Published:**

The Debt Collection Industry has been operating under laws that passed back in the days before computers, emails, and other electronic forms of communication were even considered. It has been forty-three (43) years since Congress passed the Fair Debt Collection Practice Act (FDCPA). To balance consumer protection while refining debt collection rules to reflect the world of today, the CFPB initiated the process to modernize the regulations in 2013. The entire process spanned seven years, included several thousand comments submitted to the CFPB for consideration, and took the combined efforts from two separate Presidential administrations before final rules were published.

The cumulation of efforts to reform the debt collection rules started back in February of 2020 when the CFPB published some additional proposed regulations (Supplemental Notice of Proposed Rulemaking- (NPRM)). Designed to provide additional guidance and information to consumers to address the concerns related to time-barred debts, the NPRM proposed four (4) possible model validation notices options when collecting time barred debts. The determining factor for selecting the appropriate disclosure text to use would be dependent upon either the state that the consumer currently resides, and/or the location where the debt was executed.

The first package of the final debt collection rules was released by the CFPB on October 30, 2020 and published in the Federal Register on November 30<sup>th</sup>. Encompassing over 653 pages of regulatory language, the final rules are required to be implemented no later than November 30, 2021. Although stakeholders invested in this process did not achieve every objective, they sought the new rules and most observers believe that overall, the updated regulations provide a reasonable balance.

In brief, some of the highlights of the new rules include:

- The ability to utilize modern technology to communicate with consumers. Examples of available options that will be permitted to reach consumers include emails, text, and social media platforms. An opt in from consumers is needed to provide debt collectors the authorization to communicate using these alternative methods.
- The new rules also address contact frequency, the ability to use “limited-content messaging” and opt in and opt out procedures when communicating electronically.

Part two of the new Debt Collection Rules were issued by the CFPB on December 18, 2020; published in the Federal Register on January 19<sup>th</sup>, 2021 and will also become effective as of November 30, 2021. The second set of rules focused primarily on the development of model validation notices that require disclosure of consumer rights as well as more details about the account(s) being collected, and additional restrictions before a defaulted account can be reported to the credit bureau by a third-party debt collector. Missing in the second set of rules were detailed regulations pertaining to the collection of time-barred debt other than reinforcement that consumers cannot be sued over “out of statute debts.” The CFPB did note however that additional rules to address time barred debt may be forthcoming.

Update: The CFPB has since noticed in the Federal Register a proposal to extend the implementation date of these rules to January 29, 2022, which is currently open for public comment.

### **Memorandum of Understanding**



A new and improved “Memorandum of Understanding (MOU)” was executed between the CFPB and the U.S. Department of Education during 2020. Signed by the CFPB’S Private Education Loan Ombudsman, Robert G. Cameron, and the following from the Department of Education; The Chief Operating Office from Financial Student Aid, Mark Brown, and The Financial Student Aid Ombudsman Joyce DeMoss; the (MOU) reestablished an agreement between the two federal agencies on complaint handling for student loans, guidelines on permissible uses and confidentiality of exchanged information, and sharing of data analytics.

### **Legislation During 2020**

Congressional efforts continued during 2020 to pass laws that would result in fundamental changes to the structure of the CFPB as well as insert additional restrictions for debt collections. Many of the bills introduced by the 116<sup>th</sup> Congress during 2019 remained under consideration during 2020 but failed to become law. As the COVID-19 reined havoc during 2020, members of Congress refocused and introduced new relief bills that would temporarily suspend repayment of debts such as federally held student loans, halt foreclosures and evictions, restrict reporting of some debts to the credit reporting agencies, and provide financial assistance via stimulus funds.

### **COHEAO Submits Comments “Supplemental Notice of Proposed Rulemaking”**

The CFPB Task Force collaborated with Bose Public Affairs Group to draft a response on behalf of COHEAO to the “Supplemental Notice of Proposed Rulemaking” for revised debt collection rules that was issued by the CFPB during 2020. The filing deadline was extended numerous times due to the COVID-19 pandemic. COHEAO’S comments focused on questions asked by the CFPB regarding the collection of time barred debt, and the possibility to require debt collectors use multiple variations of the validation notices depending upon current state laws governing the collection of time barred debt.

COHEAO’S comments along with other responders were considered as the CFPB deliberated on final rulemaking. The final rules released by the CFPB in December of 2020 recognized many of the concerns shared by those who submitted responses and the result was that many of their original proposals were tabled although additional rules may be published in the future. The CFPB is proposing to delay the implementation date of the new regulations.

### **Various Reports & Notices of Activity Issued by the CFPB During 2020:**

- Panel Report released (December 15, 2020) on Implementing the Dodd-Frank Act’s Small Business Lending Data Collection Requirement
- Statement released by CFPB Director Kathleen Kraninger (December 11, 2020) regarding her second-year anniversary leading the CFPB.
- Two Final Rules to Promote Access to Responsible, Affordable Mortgage Credit (Published on December 10, 2020)
- The CFPB Finalizes Advisory Opinions Policy and Announces Two New Advisory Opinions
- Supervisory Highlights (Published November 30, 2020)

- Launched a refreshed website with a new interactive enforcement database (November 25, 2020)
- Announced dollar thresholds in Regulations Z and M for Exempt Consumer Credit and Lease Transactions (November 18, 2020)
- CFPB Issues “No Action Letter” to facilitate consumer access to small dollar loans (November 5, 2020)
- Solicited comments on a proposal outlining the role of supervisory guidance (October 29, 2020)
- CFPB Private Education Loan Ombudsman Issued 2020 Annual Report (October 28, 2020)
- CFPB Releases Advance Notice of Proposed Rulemaking on Consumer Access to Financial Records (October 22, 2020)
- CFPB Report discovers continued decline in the Market for Kinds of College Credit Cards (October 8, 2020)
- CFPB Issues Policy Statement on Applications for Early Termination of Consent Orders (October 5, 2020)
- CFPB announces joint effort to crack down nationwide along with the FTC on phantom and abusive debt collection (September 29, 2020)
- CFPB announces new members to Advisory Committee (September 16, 2020)
- CFPB releases Podcast Series on “Paying for Higher Education” (September 9, 2020)
- CFPB Report Examines Early Impact of Pandemic on Consumer Credit (August 31, 2020)
- CFPB Announces Plan to Issue ANPR on Consumer-Authorized Access to Financial Data (July 24, 2020)
- CFPB Announces New Capability for the Consumer Complaint Database (July 17, 2020)
- CFPB Released Updated COVID-19 Consumer Complaint Data (July 16, 2020)
- CFPB releases on-line tool to help college students determine how to pay for college (July 15, 2020)
- CFPB and State Regulators provide additional guidance to assist borrowers impacted by COVID-19 (June 4, 2020)
- CFPB releases study that highlights challenges retirees experience to meet expenses in early years of retirement (May 27, 2020)
- CFPB extends comment period for “Supplemental Notice of Proposed Rulemaking on Time Barred Debt (May 19,2020)
- CFPB issues “Final Remittance Rule” (May 11, 2020)
- CFPB announces guidance on “Remittance Transfers During COVID-19 Pandemic (April 10, 2020)
- CFPB issues Credit Reporting Guidance During COVID-19 (April 1, 2020)
- CFPB issues request for “Information to Assist Taskforce on Federal Consumer Financial Protection Law (March 27, 2020)
- CFPB releases report on 2019 Administration of the Fair Debt Collection Practice Act (March 20, 2020)
- CFPB issues Supplemental Notice of Proposed Rulemaking on Time-Barred Debt Disclosures (February 21, 2020)
- CFPB Announces Policy Regarding Prohibition on Abusive Acts of Practices (January 24, 2020)

**Final Comments:**

A new President and administration adme into office on January 20<sup>th</sup>, 2021. CFPB Director Kathy Kraninger resigned, and President Biden nominated Federal Trade Commissioner and former CFPB Student Loan Ombudsman Rohit Chopra to be the next director, subject to Senate confirmation. The

largest question will be about the shift of the CFPB and whether more aggressive supervision and increased consumer protection enforcement will be in store for the foreseeable future.

The 2020 election resulted in a split Senate with the new Vice President Harris breaking ties and giving Democrats a working majority. The House preserved their Democratic majority although Republicans gained seats. If predictions hold true, COHEAO'S CFPB Task Force will remain very active in their objective of monitoring CFPB activity and following any legislative/regulatory changes that may impact the membership of the Organization.

In closing, the CFPB Task Force wishes to thank Bose Public Affairs Group, and specifically Harrison Wadsworth for his support, guidance, and editing. COHEAO is blessed with an unbelievable Board of Directors who remain engaged and ready to address issues that impact all membership.

Submitted by: Bob Perrin, Co-Chair Regulatory

## Financial Wellness

### Financial Wellness

In 2020, I am continuing to gather the information to build the COHEAO financial wellness database of member schools. This database will aid in the support of financial wellness resources to member schools and organizations. The database will consist of member schools that have a financial wellness program, center, or a desire to start a program. It will serve as a resource to find expert level content, find guest speakers, and to build community within COHEAO for financial wellness professionals.

**The Financial Wellness Newsletter** - The monthly newsletter is delivered electronically from COHEAO. The database has grown to 1,402 subscribers from last years' 1,322 subscribers. Clean up has continued on the list this year to get any bounced emails out of the system and to ensure more accurate information on our numbers. The newsletter continues to include trending articles, upcoming events, and recommended resources to help institutions grow their financial wellness programs. Articles featuring our member school's financial wellness programs has been added.

**Financial Literacy Month** – We held a webinar that was well received. This year we plan to run some Facebook live events with mini fireside chats to prepare for the webinar for financial wellness. The goal is to have two webinars and a panel during the COEHA workshop.

Submitted By: Lottia Windham, Financial Wellness Chair

## Loan Task Force

In 2020 the Institutional Loan group ran headfirst into the pandemic, like so many of our colleagues, our good intentions were tossed about. Meetings were delayed and expectations adjusted. Corey Rethage, after many years of strong leadership, stepped aside. Joe Weglarz, Bob Frick, and Jeff "JP" Pfund took time to reflect, adjust goals, and modify timelines. When the traditional summer/fall conferences were cancelled, we began the process of updating our Institutional Loan guide with the intent of presenting at

the February 2021 virtual conference. In 2021, JP will step away from COHEAO activities and Joe Weglarz will become point on the team.

Submitted by: Jeff JP Fund, former Vice President

## **Student Tuition and Accounts Receivable (STAR)**

2020 saw extreme and drastic changes in the way in which business is conducted due to the COVID-19 (Corona Virus) pandemic. Many initiatives were placed on hold because of the transition to remote learning (for campuses) and working.

The STAR Task Force is now currently working on a re-design of our web presence on the COHEAO website. This redesign will hopefully encompass access to any litigation (proposed and/or passed) related to the pursuit and recovery of outstanding accounts receivable. Its design will also strive to serve as a source of best practices and pertinent training ideas, that include subjects such as RFP processes and Student Financial Obligation contract samples.

The STAR Task Force, through the entire COHEAO Board, in addition to the proposed web-page design, will supplement and enhance these efforts through workshops, webinars, and conference presentations.

Submitted By: James Seward, Chair

## **Telephone Communication Protection Act (TCPA)**

The public and political outcry in support of legislation/regulations to block Robo-Calls at any cost continued to be a major theme for both Congress and the Federal Communications Commission (FCC) during 2019. According to "YouMail", a company that provides call blocking technology, an estimated 58.5 billion robocalls were made in 2019. These numbers reflected an increase of 22% from 2018. Sadly, these numbers do not separate calls that are generated for legitimate purposes compared to those that are unlawful.

To obtain a better grasp of the overall challenges related to Robocalls and understand why there is so much pressure to address this issue, below is an estimated breakout illustrating the source of the 58 billion calls made during 2019.

Type of Robo-Call	Number of Calls	Percentage of calls made
Scams	25.9 Billion	44%
Alerts & Reminders	13.0 Billion	22%
Financial Reminders	11.4 Billion	21%
Telemarketing	8.0 Billion	14%

COHEAO'S TCPA Task Force recognizes the negative impact still being experienced by the organization's membership due to the lack of clarity and outdated definitions of an auto-dialer and called parties. Many

in Washington DC were anticipating that the FCC would publish additional guidance to address these long-term issues during 2019, however as of December nothing new had been released.

The Task Force in collaboration with COHEAO'S Board, and Bose Public Affairs Group is prepared to continue advocating the concerns of the membership through the appropriate channels when the opportunity arises. Channels of communication include addressing TCPA issues with Members of Congress, the FCC, as well as respond to proposed rule-making notifications when applicable. COHEAO also continues to seize on any opportunity to further the Organization's positions by partnering with other national groups to jointly formulate responses, and schedule strategic meetings with regulators.

#### **Legal Perspective:**

According to Webrecon, there were fewer TCPA lawsuits during 2019 when compared to 2018. Statistically, TCPA represented approximately 23% of all debt collection type of lawsuits during 2019, however, the industry experienced an overall drop of 14.42% when compared to the same period in 2018. It is important to remember these statistics only represent lawsuits and do not include any direct attorney/consumer demand that are negotiated outside of the court room or through arbitration to reach resolution.

There were numerous Circuit and District Court cases during the calendar year 2019 that continue to regionally impact the interpretation of TCPA regulations. An apparent victory from one region of the country is unfortunately offset by an opposite ruling from another district/circuit. What remains clear is that despite the ruling by the D.C. Circuit in the case of ACA International v FCC that was handed down back in March of 2018 stating the need for clearer definitions of what an Automated Telephone Dialing System (ATDS) as well as a reassigned number, the FCC did not issue further rules in 2019 to address those concerns. Until either the FCC or Congress provides additional clarity either through legislation or regulations, judges will continue to issue different rulings based on the specific circumstances related to the case before them.

#### **Impactful Court Cases:**

The Supreme Court issued a ruling on June 20<sup>th</sup> for the case of PDR Network, LLC ET AL., v Carlton & Harris Chiropractic, Inc. This case involved two federal statutes:

TCPA-Prohibition to send an unsolicited advertisement by fax

Administrative Orders Review Act (Hobbs Act)-Federal Court of Appeals has "exclusive jurisdiction to enjoin, set aside, suspend, or the ability to determine if the validity of "final orders of the FCC"

In summary the Supreme Court had to determine whether the FCC term "unsolicited advertisements" requires the lower courts to abide by the definition based on the Fourth Circuit decision. The district court had dismissed the case claiming that the fax sent by PDR Network was not an "unsolicited advertisement." The Fourth Circuit reversed that ruling arguing that the Hobbs Act required the District Court to apply the FCC "Definition." The Supreme Court vacated the Fourth Circuit decision.

Although the petition before the Supreme Court was not granted for the 2<sup>nd</sup> until January 20<sup>th</sup>, 2020, the application requesting the court to consider the case of “William P Barr v American Association of Political Consultants Inc” was docketed on November 15, 2019. The final ruling when handed down for this case will impact the members of COHEAO. At issue is:

The TCPA exemption that Congress passed in 2015 authorized the use of an ATDS when calls are made “solely to collect a debt owed to or guaranteed by the United States.” The argument before the court to resolve is the constitutionality of the exemption as it relates to the First Amendment.

The Supreme Court is expected to hear arguments sometime in the Spring of 2020. If ruled unconstitutional, this decision would eliminate the exemption provision and restrict debt collectors from using ATDS’s when collecting government debt (including federal student loans) unless the consumer has provided prior consent.

### **Proposed Rulemaking**

COHEAO submitted comments to the Federal Communication Commission in response to the FCC’s Public Notice announcing their intent to implement Section 503 of the Ray Baum’s Act (Rules and Regulations implementing the Truth in Caller ID Act of 2009). The comments reaffirmed COHEAO’s support of preventing caller ID spoofing when used for illegitimate purposes, however, COHEAO noted that there are legitimate purposes for ID spoofing and the ability to use them when legitimate should remain protected.

### **Legislative Initiatives**

The Task Force is also charged with the responsibility to monitor any proposed legislation and determine if a bill being introduced would have either positive or negative impact to COHEAO’S membership. The goal is to further educate the membership and work closely with Bose Public Affairs Group to establish strategies to support the desires and goals of COHEAO.

A host of bills were introduced during the 2019 session of Congress. Both the House and Senate came to bipartisan agreement on a major TCPA bill and successfully passed the “Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act.” Referred to as the “Trace Act” this legislation was signed by the President on December 30<sup>th</sup>, 2019.

In summary the “Pallone-Thune Traced Act” gave the FCC additional tools to enforce TCPA and mandated certain timelines for the FCC to establish rules. Some key points and required timelines of the legislation included:

The FCC is required to issue rules by March 29,2020 to establish the framework for implementing the Stir/Shaken authentication to prevent call spoofing

The legislation also required the FCC to initiate a new rulemaking to address parties from one-ring scams by April 28, 2020

The bill further requires the FCC to develop new procedures by June 27, 2020 to reduce access to numbers that are obtained by robocall violators.

A deadline of July 27, 2020 was established for the FCC to issue a Public Notice soliciting voice servicer providers comments on the private-led efforts to track the origin of unlawful robocalls

The legislation also provided a deadline of September 25<sup>th</sup>, 2020 for the FCC to adopt and issues regulations to Section 227 made by the Traced Act.

A report on enforcement actions must be submitted to Congress by December 30,2020 and every year thereafter.

The FCC must require voice service providers to implement the STIR/Shaken authentication process by June 30, 2021.

The “Traced Act” also extended the statute of limitations for the FCC to enforce violations from one to four years as well as increased the penalties for violations

### **Final Thoughts**

The TCPA Task Force is dependent upon the support of Bose Public Affairs Group and COHEAO’s Board of Directors to successfully meet the goals and directives that are important to the organization’s membership. On behalf of the Task Force we want to extend our appreciation for the never-ending support to help accomplish the established goals during 2019.

Submitted by: Bob Perrin, Co-Chair Regulatory

## **Agenda Committee**

In 2020, COHEAO offered an annual conference, no regional workshops (due to COVID), three (3) free webinars and eight (8) paid webinars. Details on each event are outlined below.

- **2020 Annual Conference**
  - February 11-12, 2020: COHEAO Annual Conference, Washington, D.C.
    - Attendees:
      - 25 School (\$395)
      - 24 Commercial (\$465)
  
- **2020 Workshops**
  - May 2020: COHEAO Higher Ed Compliance Workshop, Trinity Christian College, Palos Heights, IL
    - Attendees: 0-CANCELLED due to COVID
  
  - November, 2020: COHEAO Higher Ed Compliance Workshop, San Antonio, TX
    - Attendees: 0- CANCELLED due to COVID

- **2020 Webinars**
  - **Free Webinars:**
    - Wednesday, April 29, 2020: Higher Ed and COVID-19: Recent Government Actions and How Schools Can Navigate Market Fluctuations
      - 44 Participants:
    - Thursday, May 21, 2020: Membership Town Hall with COHEAO's Board of Directors
      - 57 Participants:
    - Thursday, September 24, 2020: Building an Inclusive Campus Community: Committing to The Work of Change
      - 88 Participants:
    - Tuesday, November 10, 2020: 2020 Elections: What Happened and What Lies Ahead for Higher Education
      - 97 Participants
  - **Paid Webinars:**
    - January 30, 2020: Q&A with Industry Experts on Perkins Loan Assignment and the Distribution of Assets Process
      - 93 Participants
    - Thu, Feb 20, 2020: COHEAO's February Financial Literacy Webinar: The PSLF Program-All Your Questions Answered
      - 23 Participants:
    - Wednesday, October 28, 2020: Protecting Campuses from Cyber Crimes
      - 42 Participants
    - Thursday, November 12, 2020: 1098-T's: Reporting Requirements and Best Practices
      - 194 Participants
    - Wednesday, December 16, 2020: CFPB: Regulatory and Collection Updates
      - 108 Participants

In total, there were 49 Annual registrants. The workshops were both cancelled due to COVID. Finally, we had 460 paid webinar participants (5 webinars) and 286 free webinar participants (4 webinars).

Agenda for the annual conference:



**COHEAO Annual Conference Agenda 2020**  
*All Meetings and Sessions locations are listed below*



**Monday, February 10<sup>th</sup>, 2020**

**Location: Bose Public Affairs Group**

**777 Sixth Street, N.W. Suite 510, Washington, D.C. 20001**



8:30am – 3:30pm **Board of Directors Meeting**

4:00pm – 5:00pm **Commercial Members Meeting**

**Tuesday, February 11<sup>th</sup>, 2020**

**Location: University of California, Washington Center**

**1608 Rhode Island Ave NW, Washington, DC 20036**

7:45am – 8:15am **Breakfast & Registration**

8:15am – 8:30am **The President’s Welcome**

*Welcome to the Annual Conference! COHEAO President Lori Hartung will deliver opening remarks to kick off the conference.*

Speaker: Lori Hartung, COHEAO President

8:30am – 9:30am **Session: COHEAO's Washington Update**

*COHEAO Executive Director Harrison Wadsworth will set the stage for the rest of the conference with an update on higher education related activity in Washington, D.C. and what is relevant to COHEAO members.*

Speaker: Harrison Wadsworth, COHEAO Executive Director  
Moderator: Lori Hartung, COHEAO President

9:30am – 10:30am **Session: Financial Responsibility Agreements – A School’s Perspective**

*To mitigate the risk of class action or individual law suits, schools must have a Financial Responsibility Agreement (FRA) in place advising students about collection costs and how they are assessed onto their account and “Agreed to” by the student before or when the debt was incurred, otherwise known as the point of registration. This session will show how to develop and implement an effective FRA and explain how an FRA can actually be a useful retention tool.*

Speaker: James Seward, Drexel University,

Greg Allard, Law Offices of J. Scott Watson, P.C.

Moderator: Mike Mietelski

10:30am – 10:45am **Break**

10:45am – 11:45am     **Session: An Update from the CFPB**

*This session will provide an update on Consumer Financial Protection Bureau (CFPB) activities and industry changes, serving as a briefing on recent case law, news, and developments related to the CFPB.*

Speaker:

Moderator: Bob Perrin, William & Fudge

11:45am – 1:00pm     **Lunch**

1:00pm – 2:00pm     **Session: Financial Literacy**

*In June 2019, the Treasury Department issued an extensive report on steps schools can take to improve financial literacy education on their campuses to better inform student borrowing and effectively engage students in financial literacy and education. This session will explore some of these recommendations as well as give an update from the financial literacy world in general, and there will be a discussion of best practices and programs.*

Speaker: Hannah Sadollah, University of Maryland, Baltimore County

Moderator: Lottia Windham, Southern Methodist University

2:00pm – 3:00pm     **Session: Institutional Loans-A comparison of Institutional Loans and Income Share Agreements**

*This session will delve into the benefits and differences of the two programs. ISA's are growing in popularity, but are they the right choice to pursue for your campus? Are they more similar to loans, or should they be thought of as contracts? Members of COHEAO's Institutional Loans Task Force will answer all your questions.*

Speakers: John Culhane, Ballard Spahr  
Martin Herrick, Vemo Education  
Jeff Pfund, University of Wisconsin-Madison  
Balaji Rajan, Cennate  
Moderator: Corey Rethage, Flywire

3:00pm – 3:15pm     **Dessert Break**

3:15pm – 4:15pm

**Session: An Update on the Federal Perkins Loan Program**

Speakers: Maria Livolsi, State University

Jan Hnilica, Trinity Christian College

Moderator: Jeff Pfund, University of Wisconsin-Madison

6:00pm – 7:30pm

**Silent Auction and Reception to Benefit the COHEAO Scholarship Fund**

**Location: City Tap House-Dupont Circle**

**[1250 Connecticut Ave. N.W., Washington, D.C. 20036](#)**

*Join your colleagues for an evening reception and great fun in the name of a great cause! The COHEAO Silent Auction at the Annual Conference is the primary funding mechanism for our Scholarship Fund. It is not always so silent, but there are always great items available at great prices and fun for all involved!*

**Wednesday, February 12<sup>th</sup>, 2020**

**Capital Visitor Center**

**First St NE, Washington, DC 20515**

8:30am – 8:45am

**Breakfast**

8:45am – 9:00am

**Annual Business Meeting- Bob Frick**

**Awards: Lori Hartung**

9:00am – 9:30am

**Session: Congressional Address**

Moderator: Nancy Lange, RMS-Recover Management Services

9:30am – 10:30am

**Session: Session: Department of Education Update**

Speaker: Tamy Abernathy, Department of Education

Moderator: Joe Weglarz, Marist College

10:30am – 10:45am

**Break**

10:45am – 11:45am

**Session: Congressional Staff Panel**

Moderator: Christina Cardinale, Manhattan College

11:45am – 12:15pm    **Session: How to Maximize Advocacy Efforts**

Speaker: Karen Reddick, National Credit Management

Moderator: Jan Hnilica, Trinity Christian College

12:15pm – 12:30pm    **Closing Remarks & Distribution of Boxed Lunches**

**Visits to Congressional Offices**

Location: House and Senate Office Buildings, Washington, D.C.

*Please visit your legislators' offices to inform them on issues affecting your campus or organization, such as the importance of the Perkins Loan Program for you and your students. Attendees are encouraged to make appointments in advance.*

Submitted by: Christina Cardinale, Agenda Chair

## COHEAO 2021 Board of Directors

COHEAO 2021 Board of Directors			
ELECTED POSITIONS			
OFFICERS			
PRESIDENT	VICE PRESIDENT	SECRETARY	TREASURER
Lori Hartung	Jan Hnilica	Lee Anne Wigdahl	Bob Frick
ELECTED POSITIONS			
MEMBERS AT-LARGE			
STARS	CAP/Hill	Agenda	
James Seward	LaToya Smith	Christina Cardinale	
PAST PRESIDENT (Perkins Regulations)	COMMERCIAL CHAIR	EXECUTIVE DIRECTOR	
Maria Livolsi	Chris Stompanato	Harrison Wadsworth, Robert Moran	
INTERNAL OPERATIONS			
CHAIR	(CO-CHAIR) FINANCIAL WELLNESS TASK FORCE CHAIR	(CO-CHAIR ) COMMUNICATIONS CHAIR	CO-CHAIR SUPPORT
Karen Reddick	Lottia Windham	Michelle Hartmann	John Schwarm
LEGISLATIVE			
LEGISLATIVE CHAIR/GRASSROOTS	LOAN TASK FORCE CHAIR	REGULATORY (CFPB, TCPA, FCRA)	
Robert Schuerger	Joe Weglarz	Bob Perrin	
MEMBERSHIP			
CHAIR	CO-CHAIR INSTITUTIONAL	CO-CHAIR COMMERCIAL	CO-CHAIR/ SUPPORT/AGENDA
Nancy Lange	Maribeth Gloekler	Chris Stompanato	Jim Garrant