



Colin Bishopp
Executive Director, PACENation
colin@pacenation.org
202.550.7570

July 10, 2020

Kathleen L. Kraninger, Director
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20552

Re: Account Level Data Collection from PACE Program Administrators

Dear Director Kraninger:

I am writing in response to the Consumer Financial Protection Bureau's ("Bureau") request for comment regarding a Generic Information Collection titled, "Account Level Data Collection from PACE Program Administrators." We appreciate the opportunity to comment on the Bureau's data collection process.

We offer three comments for your consideration:

1. The Bureau's Request for Information ("RFI") must be structured to protect homeowner data privacy, including personally identifiable information ("PII"). Examples include names, addresses, Social Security numbers and assessor's parcel numbers and equivalents. The RFI should provide program administrators and governmental entities, which are the subject of data requests, with the means to ensure compliance with all federal and state privacy laws and should provide indemnification to private entities for potential data security breaches not caused by such entities. Additionally, to protect confidential customer financial data and PII, the data request should request the minimum amount of such PII necessary to achieve the data analysis goals and use encryption wherever possible.
2. Any third-party access to the data (e.g., by Bureau vendors) must be done in a manner that removes all PII and protects homeowners. Any use of credit reports should be structured to avoid being counted as a "hard" or "soft" credit pull, which could negatively impact consumer credit scores.
3. The Bureau's rulemaking process for residential PACE financing should focus on account level data collected prior to the emergence of the COVID-19 pandemic. The rulemaking should be based on project data under normal circumstances as opposed to project data that has been influenced by a once-in-a-century outlying event like a global pandemic.

Thank you again for the opportunity to comment on the Bureau's data collection process.

Sincerely,

A handwritten signature in black ink, appearing to read "Colin Bishopp", written in a cursive style.

Colin Bishopp
Executive Director