

Bureau of Consumer Financial Protection
1700 G Street NW
Washington, D.C. 20552



April 19, 2021

Lindsay Abate
Desk Officer for the Consumer Financial Protection Bureau
Office of Information and Regulatory Affairs
Office of Management and Budget, Room 10102
New Executive Office Building
Washington, D.C. 20503

Dear Ms. Abate,

Pursuant to Office of Management and Budget (OMB) procedures established for the Paperwork Reduction Act at 5 Code of Federal Regulations (CFR) Part 1320, I request that the information collection contained within the Interim Final Rule titled “Debt Collection Practices in Connection with the Global COVID-19 Pandemic (Regulation F)” be processed as an Emergency Clearance Request in accordance with 5 CFR Part 1320.13.

I have determined that this information must be collected prior to the timelines established under 44 United States Code Chapter 35 (and 5 CFR Part 1320). This information collection is essential to the Bureau’s mission to prevent public harm as it relates to the COVID-19 pandemic.

On March 29, 2021, the Centers for Disease Control and Prevention (CDC) extended an existing agency order that imposes an eviction moratorium that generally limits the circumstances in which certain persons may be evicted from residential property. The Bureau is concerned that consumers are not aware of their protections under the CDC Order’s eviction moratorium and that debt collectors covered by the Fair Debt Collection Practices Act (FDCPA) may be engaging in eviction-related conduct that violates the FDCPA.

This interim final rule addresses the public health emergency caused by the COVID-19 pandemic and its effects on consumers, particularly renters who may be vulnerable to the negative economic impacts of the pandemic, the risk of eviction, and the health and safety consequences that may ensue. Since the CDC Order’s eviction moratorium went into effect in September 2020, some debt collectors have engaged in evicting consumers from residential properties. The Bureau has become aware in the months following the initial institution of the CDC Order’s eviction moratorium that consumers who interact with these debt collectors may

not be aware of their protections under the CDC Order. The failure of debt collectors to disclose these protections can violate the FDCPA with immediate consequences to health and safety. These challenges have emerged only after the CDC Order initially took effect and the temporary eviction moratorium effectuated by the CDC Order has recently been extended for a limited period of time. To provide necessary protection for consumers (particularly in light of the health and safety consequences of eviction as well as clarity for debt collectors) it is critical that the interim final rule take effect as soon as possible.

The Bureau respectfully requests OMB approval of this information collection request by May 3rd, which is also the effective date of this rule.

Sincerely,



David Uejio
Acting Director