

March 29, 2021

The Honorable Rafael Anchía
Chairman, Pensions, Investments & Financial Services Committee
Texas House of Representatives
P.O. Box 2910
Austin, Texas 78768-2910

Re: CSHB 3510

Dear Chairman Anchía & Members of the Committee:

We write on behalf of the American Financial Services Association (“AFSA”)¹ in support of CSHB 3510. This bill would allow employees of businesses licensed by the Texas Finance Commission to work remotely as long as licensees appropriately safeguard data, appropriately monitor of employees, and ensure unimpeded regulatory oversight. The bill includes ongoing rulemaking authority regarding remote work.

Throughout the coronavirus pandemic, our members have conducted these activities safely and effectively at home, consistent with guidance from the Office of the Consumer Credit Commissioner. During the past year, employees have safely and efficiently conducted operational and licensable activities—including loan servicing, credit decisioning, funding and collections—while minimizing disruptions in service for our consumers. We believe that continuing remote work beyond the pandemic will serve in the best interest of all parties, allowing for licensees to be more flexible in their employment practices, while still providing the same secure services to the public.

We respectfully urge you to support CSHB 3510 to remove statutory barriers to permanent remote work. Thank you for your time and attention. If you have any questions, or if AFSA or our undersigned members can be of any further assistance to you as you move forward, please do not hesitate to contact us.

¹ Founded in 1916, the American Financial Services Association (AFSA), based in Washington, D.C., is the primary trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including direct and indirect vehicle financing, traditional installment loans, mortgages, payment cards, and retail sales finance. AFSA members do not provide payday or vehicle title loans.

Sincerely,



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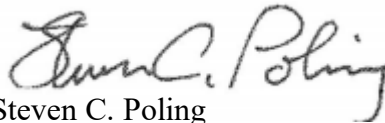
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