



## **2023 STATE PRIORITIES MASTER LIST**

### **GENERAL INTEREST**

Access to credit  
Activist activities  
Algorithms  
All-in APR caps  
Alternative identification  
APR / TILA definitions  
Attorney general activities / AG relations  
Auto-dialer restrictions affecting collection efforts  
Ballot Initiatives  
Collection restrictions  
Consumer complaints  
Convenience fees  
Credit repair organizations / debt settlement companies  
Credit reporting / credit report suppression  
Creditor-placed insurance  
Cybersecurity requirements  
Data breach notification requirements  
Debt collection / for profit debt collectors  
Debt settlement companies / credit repair organizations  
Examinations and licensing  
Homestead exemption  
Identity theft  
Internet lending prohibitions  
Language requirements for non-English speakers  
Live checks / loans by mail  
Military lending restrictions  
Municipal restrictions on loan products, rates or activities  
NMLS  
Optional protection products / Ancillary products / Voluntary protection products restrictions  
Payment forbearance  
Privacy  
Race/gender data collection non-mortgage  
Rate caps  
Reinstatement of Glass-Steagall  
Remote work  
Risk-based pricing restrictions  
Securitization threats  
Social Security Number restrictions affecting ability to issue credit  
Soundness requirements for nonbank financial institutions  
Taxation specific to lenders  
Third-party payment processor restrictions  
UDAAP

## **CARDS**

- Billing practices
- Contract restrictions
- Escheatment
- Gift card / stored value restrictions
- Honor-all-card restrictions
- Interchange
- Interest calculation and disclosure requirements
- Marketing restrictions / do-not-mail
- Payroll cards
- Prepaid cards
- Surcharging

## **MORTGAGE LENDING & SERVICING**

- E-notary / remote notary
- Eviction bans
- Foreclosures (including moratorium, judicial/non-judicial, expedited for abandoned properties, other legislation re: prevention, mandatory counseling, rescue scams, tenant protection, etc.)
- Lien priority / “superliens”
- Municipal vacant property upkeep ordinances
- Municipal foreclosure mediation ordinances
- Municipal use of eminent domain to seize mortgages
- NMLS / ongoing SAFE Act issues: loan servicer clarification; privacy & security; accountability; governance & transparency; employee licensing; education and testing
- Servicer / lienholder restrictions

## **TRADITIONAL INSTALLMENT LENDING**

- Ability to repay
- 36% creep and other rate caps
- Inadvertent effects on personal loan industry by legislation focused on others
- Lending databases
- Market opening opportunities
- Optional protection products / Ancillary products / VPPs specific to personal loans
- Precomputed / pre-payment refund methods
- Rate band modernization
- Zoning ordinances

## **VEHICLE FINANCE**

- Ancillary product / VPP scrutiny on vehicle-specific products (including debt cancellation agreements, guaranteed asset protection (GAP) agreements (also called GAP waivers), motor clubs, service contracts, extended warranties)
- Automatic license plate recognition systems (ALPR)
- Bankruptcy/default triggers
- Car Buyers’ Bill of Rights and “light” versions of CBBOR
- Contract restrictions
- Dealer relations/franchise legislation
- Dealer reserve
- Documentation fees

Driver/owner liability shifting  
Electronic contracting  
Electronic titling  
Fair lending issues  
Fraudulent and excessive liens  
GAP refund requirements  
Lease-specific issues  
Lienholder notification  
Payment assurance technology  
Post-default issues  
Repossession  
Retail bad debt  
RISC requirements / restrictions  
SCRA state legislation sometimes specific to auto sales/lease sector  
Titling issues (general)  
Trade-in calculation  
Transportation network companies (Uber, Lyft, Sidecar)  
Vehicle rescission / turn in