September 14, 2026

The Honorable French Hill
Chairman
Committee on Financial Services
U.S. House of Representatives
Washington, DC 20515

The Honorable Maxine Waters
Ranking Member
Committee on Financial Services
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Hill and Ranking Member Waters:

The American Financial Services Association (AFSA) is pleased to submit this letter in advance of the House Financial Services markup on September 16, 2026, and strongly supports passage of the following legislation under consideration.

- **H.R. 7866 – the American Lending Fairness Act (ALFA)** - sponsored by Rep. Warren Davidson (R-OH), this bipartisan legislation will amend the Depository Institutions Deregulation and Monetary Control Act of 1980 (DIDMCA), to clarify the scope of DIDMCA's opt-out provision while preserving DIDMCA's intent of parity amongst state-charted federally insured banks and national banking institutions.

  The dual banking system is an essential feature of the U.S. financial services ecosystem, allowing both federally chartered and state-chartered banks to coexist. At a time when competition was needed in the financial banking system, DIDMCA was passed to even the playing field. Passage of the ALFA will ensure parity among lending institutions nationwide, clarify the limited scope of DIDMCA's opt-out provision, and provide certainty that the dual banking system is preserved.

- **H.R. 1653 - the Civil Investigative Demand Reform Act (CID Reform Act)** – sponsored by Rep. Andy Barr (R-KY) and Rep. Vicente Gonzalez (D-TX), this bipartisan legislation will provide financial institutions with a clearer roadmap of the CID process by requiring the CFPB to provide a notification of purpose, improve judicial review and enhance communications between the CFPB and the financial institution while maintaining confidentiality, among others. Under the previous Administration's CFPB Director, the Bureau misused its civil investigative demand authority with burdensome examinations against regulated financial institutions, including small financial institutions. These highly unusual tactics by the CFPB through CIDs have often been initiated with vague statements without specifying a purpose to the financial institution. The CID Reform Act will bring greater regulatory clarity and transparency to financial institutions that provide essential consumer credit services to their communities.

- **H.R. 10184 - the Consumer Financial Protection Accountability and Reform Act** – led by Rep. Andy Barr (R-KY) and Chairman French Hill (R-AR), this landmark legislation will provide much-needed reforms to the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which created the CFPB. Specifically, the legislation contains many pro-consumer provisions that AFSA has long supported, including placing the Bureau under the appropriations process and creating a separate Inspector General at the CFPB. In addition, this comprehensive reform package has meaningful changes to the CFPB complaint database, defines Unfair, Deceptive, and Abusive Acts and Practices, and prevents regulation by enforcement.

We applaud your efforts in recognizing that after more than fifteen years, it is time for a fresh look at a statute passed in response to a mortgage crisis, but one that has ended up affecting all areas of consumer finance, the majority of which had no part in the crisis. Instead of providing meaningful consumer protection, the CFPB's overreach has driven up costs for consumers by imposing unnecessary and extensive burdens on lenders. Amending the statute would allow for the continuation of the parts of the Consumer Financial Protection Act (CFPA), without the overreach that has characterized much of the CFPB's existence.

Sincerely,

Celia Winslow

Celia Winslow
President and CEO
American Financial Services Association

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