



The State of South Carolina Department of Consumer Affairs

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July 6, 2018

Monica Jackson
Office of the Executive Secretary
Docket No. CFPB 2018-0015
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20552

RE: CFPB-2018-0015 Bureau Financial Education Programs

Dear Ms. Jackson:

The South Carolina Department of Consumer Affairs (“SCDCA”) is pleased to offer comments in response to the Bureau’s Request for Information regarding Bureau Financial Education Programs. SCDCA is the state’s consumer protection agency. Established in 1974, SCDCA is responsible for the administration and enforcement of Title 37 of the South Carolina Code of Laws, the Consumer Protection Code. Central to SCDCA’s mission is protecting consumers from inequities in the marketplace by educating them and businesses on their respective rights and responsibilities.

SCDCA helps formulate and modify consumer laws, policies, and regulations; resolves complaints arising out of the production, promotion, or sale of consumer goods or services in South Carolina, whether or not credit is involved; and promotes a healthy competitive business climate with mutual confidence between buyers and sellers. Overall, SCDCA protects consumers while giving due regard to those businesses acting in a fair and honest manner.

During Fiscal Year 2018, SCDCA gave more than fifty presentations, with approximately 16,000 attendees. Scams and identity theft related issues were the top two education topics for those presentations. Additionally, SCDCA creates and distributes thousands of educational materials each year.

The following comments are based upon SCDCA’s experience in educating consumers in South Carolina, as well as researching current trends and topics affecting consumers in this state.

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Avoiding Duplication in Financial Education Between the Bureau and Other Agencies or Entities, Including Federal, State, and Local Agencies

(Question b.) Are there ways to improve coordination in financial education activities between the Bureau and other agencies?

SCDCA encourages the Bureau to coordinate with state agencies that share the Bureau's goal of educating consumers about financial products and services. In its over forty years of existence, SCDCA has found the partnerships with federal agencies to be most beneficial in the education space. SCDCA partners with other federal agencies to further outreach initiatives on specific issues affecting consumers such as identity theft, debt collection and general consumer credit topics. To this end, we encourage the Bureau to engage in one-on-one outreach meetings with appropriate state agencies to determine common ground and how each can support common missions or otherwise leverage resources to create more efficient and effective educational campaigns.

Template sharing is also a practice SCDCA sees as beneficial in ensuring consumers receive the most comprehensive information. The Bureau produces excellent educational materials that align with the most prevalent issues consumers face in today's ever-changing marketplace and serve to compliment materials created at the state level. SCDCA has used such information when presenting to consumers across South Carolina. To better increase the impact and efficiency of delivery, we suggest making documents available in their foundational format to state agencies. Oftentimes a topic is covered by both state and federal laws, thus varying resources exist. Our office and South Carolina consumers have benefitted greatly from the openness of other federal agencies in the sharing of pamphlet templates that can be combined with state specific information. The end result is a comprehensive guide for consumers.

Conclusion

SCDCA appreciates the opportunity to comment on the Bureau's Request for Information regarding Bureau Financial Education Programs and encourages the Bureau to coordinate with state agencies to further its education initiatives. Should you have any questions pertaining to our comments, please feel free to contact me at 803-734-4233.

Best Regards,

Carri Grube Lybarker, Esq.