



Americans for Financial Reform
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The Honorable Ben S. Bernanke
Chairman
Board of Governors of the Federal Reserve System
20th St. and Constitution Avenue N.W.
Washington, D.C. 20551

The Honorable Martin J. Gruenberg
Acting Chairman
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Mr. John G. Walsh
Acting Comptroller of the Currency
Office of the Comptroller of the Currency
250 E Street, S.W.
Washington, D.C. 20219

Dear Chairman Bernanke, Acting Chairman Gruenberg, and Acting Comptroller Walsh:

Americans for Financial Reform (“AFR”) appreciates this opportunity to comment on “Risk-Based Capital Guidelines: Market Risk; Alternatives to Credit Ratings for Debt and Securitization Positions”. AFR is a coalition of over 250 national, state, local groups who have come together to advocate for reform of the financial industry. Members of AFR include consumer, civil rights, investor, retiree, community, labor, religious and business groups along with prominent independent experts.

This letter is in response to the joint request for comment by the Federal Deposit Insurance Corporation, the Federal Reserve, and the Office of the Comptroller of the Currency (“the agencies”) on new rules replacing the use of credit ratings in setting capital requirements for debt and securitization positions held by banks.

Section 939A of Dodd-Frank Wall Street Reform and Consumer Protection Act (DFA) requires that the Agencies remove references to ratings by Nationally Registered Statistical Rating Organizations (NRSROs) in all regulations and substitute an alternative ‘standard of credit worthiness’. This step by Congress was a reaction to the over-reliance on frequently unsound credit ratings as a risk management tool, which played a key role in enabling the financial crisis.

This rule does remove NRSRO references. However, the alternative standards of credit-worthiness substituted are not satisfactory. This is particularly true in the area of securitizations, which were at the center of the financial crisis. While the treatment of securitizations in this rule does create a simple procedure for attaching a capital charge to securitized assets, it is far from being a reasonable or reliable standard of ‘credit-worthiness’ as mandated in the statute.

AFR has a number of specific suggestions for improving the proposed securitization assessment. But the truth is that the complexity of structured securities makes a “one size fits all” approach hard to design and easy to game. For this reason, AFR recommends that the Agencies turn to a direct monitoring approach for asset backed securities similar to the “third party vendor” approach discussed in the rule (CFR 73398). The arguments against this approach in the rule are not credible and the financial regulatory community clearly has the resources available to perform such monitoring. The knowledge gained from such a direct monitoring approach would be an invaluable addition to the entire regulatory process, including other areas where the Dodd-Frank Act has mandated that credit ratings be removed from regulation.

Overreliance on Unreliable Ratings Was A Major Contributor to The Financial Crisis

Recent reports by the Financial Crisis Inquiry Commission (FCIC) and the Senate Permanent Subcommittee on Investigations have laid out in extensive detail the absolutely central role played by credit rating agencies as enablers of the financial crisis.¹ The FCIC summarized the case well in its Conclusions:

“...credit rating agencies were essential cogs in the wheel of financial destruction. The three credit rating agencies were key enablers of the financial meltdown. The mortgage-related securities at the heart of the crisis could not have been marketed and sold without their seal of approval. Investors relied on them, often blindly. In some cases, they were obligated to use them, or regulatory capital standards were hinged on them. This crisis could not have happened without the rating agencies. Their ratings helped the market soar and their downgrades through 2007 and 2008 wreaked havoc across markets and firms.”

The “big three” rating agencies were paid by securities issuers and faced a fundamental conflict of interest. This conflict was perhaps especially salient in rating novel, complex asset-backed securities. The ratings for such securities were dependent on complex mathematical models that were not well understood by investors, and rested on numerous assumptions that could easily be changed to give ratings the issuer desired. The FCIC report summarizes some statistics concerning the almost incredible failure of NRSRO ratings prior to the crisis.

¹ The Financial Crisis Inquiry Commission, [The Financial Crisis Inquiry Report](#), January, 2011; Permanent Subcommittee on Investigations, [Wall Street And The Financial Crisis: Anatomy of a Financial Crisis](#), United States Senate Committee on Homeland Security and Government Affairs, April 13, 2011.

“From 2000 to 2007, Moody’s rated nearly 45,000 mortgage-related securities as triple-A. This compares with six private-sector companies in the United States that carried this coveted rating in early 2010. In 2006 alone, Moody’s put its triple-A stamp of approval on 30 mortgage-related securities every working day. The results were disastrous: 83% of the mortgage securities rated triple-A that year ultimately were downgraded.”

It is especially important to note that even the most senior and highest-rated MBS tranches turned out to be completely unreliable. Overall, 40 percent of the structured securities rated investment grade (triple-A or double-A) by Moody’s between 1993 and 2010 were found to be impaired, and the ten year loss rate on investment-grade structured securities written over the period was 24 percent.²

The Proposed Rule

Because of their centrality to current and past financial stability problems, we are restricting our comment to sovereign debt and securitization issues.

Sovereign Debt

Sovereign debt is fundamentally different than other forms of debt. For most governments, there is a large amount of public information on finances available. Government debt repayment is a fundamentally political question that is difficult to predict using purely economic metrics. Both of these statements are especially true for higher-income nations.

Question 2: The agencies solicit comment on the use of the CRC ratings to assign specific risk-weighting factors to sovereign debt positions.

It is encouraging to see regulators turning to an international governmental organization for risk ratings. This is an appropriate type of entity to assess country debt. It is true that the Country Risk Classifications (CRC) ratings are not designed as sovereign debt risk classifications. In fact, the CRC web site specifically states “The country risk classifications **are not** sovereign risk classifications” (emphasis in original).³ As the Agencies note, the CRC ratings are not effective at distinguishing between sovereign risks among the set of high-income countries. Furthermore, the ratings appear biased toward European countries. For example, China is rated as a worse risk than Greece, and Brazil as a worse risk than Portugal. This is hard to justify based on the relative fiscal positions of the countries in question.

The careful use of market-based metrics, as discussed below, would also be very helpful. Supplemented by these additional sources of information the CRC provides a useful starting point. However, we also recommend that the Agencies look at the CRC as simply a starting

² Moody’s Investors Service, “Default and Loss Rates of Structured Finance Securities, 1993-2010”, Special Comment, September 30th, 2011.

³ OECD, “[Country Risk Classification](#)”, accessed January 2012.

point, and continue to consider data possibilities from other international bodies to improve this metric.

Question 3: How well does the proposed methodology assign specific risk-weighting factors to sovereign debt positions that are commensurate with the relative risk of such exposures? How could it be improved? What are the relative merits of the two market-based alternatives described above (using sovereign CDS spreads and bond spreads) as supplements to the CRC ratings?

Two market-based supplements for CRC ratings would be helpful. First, market metrics should be used to supplement information for higher income European countries, which have uniformly low-risk CRC ratings, in order to determine if they have default risk higher than their CRC ratings. This is discussed in the proposed rule. The recent default metric included in the rule is a useful step. It would also be useful to add a market-based metric less extreme than default. Second, market-based metrics should also be used to determine if non-European countries are better credit risks than is reflected in their CRC rating. This second issue is neglected in the rule and should be added. It is especially applicable for large, economically significant non-European countries with deeper markets for sovereign debt.

In developing market metrics, care should be taken to avoid excessive volatility in capital charges for sovereigns based on temporary market spikes during periods of political uncertainty. In addition, metrics such as CDS spreads are strongly linked to the state of the global economy (as opposed to the idiosyncratic default risk of the particular country).⁴ Thus an excessive reliance on short-term market metrics would introduce a strong pro-cyclical element into capital charges. Sovereign CDS markets are thin and, while sovereign bond markets are larger, they are illiquid. All of these factors argue for a less granular, more approximate use of market metrics.

The proposed rule appears to view the CDS and bond approaches as mutually exclusive, but combining both would maximize the information available. A metric based on a rolling long-term average of both CDS and bond spreads relative to a U.S. benchmark, with a small number of risk classifications, would best meet the objective of introducing market sensitivity without overweighting short-term moves in thin markets.

Securitization Positions

The SSFA proposed in this rule for securitization positions is disappointing. Undercapitalized tail risk in senior securitization positions was of course at the heart of the 2008 financial crisis and the motivation for the Dodd-Frank Act. The crisis also offered ample demonstration of the complexity of structured finance and the ability to arbitrage both regulatory capital rules and market discipline by concealing credit risk in complex securitization structures. Yet it is highly

⁴ Longstaff, Francis et. al. "[How Sovereign is Sovereign Credit Risk?](#)", *American Economic Journal: Macroeconomics* 3, April, 2011 pp. 75-103.

questionable whether the SSFA ensures that risky but senior positions will be adequately capitalized. This may not be a problem in the short run, as investors are wary of securitizations generally and the private mortgage securitization market is non-existent for lower quality borrowers. But the SSFA must function in a revived securitization market.

Question 12: Is the SSFA function appropriately calibrated and would it be a feasible and appropriate methodology for assigning specific risk add-ons for securitization positions? Why or why not?

We do not believe the SSFA function is appropriately calibrated. Below we list some of the issues involved with both the SSFA function and the loss adjustment.

Similar to pre-crisis credit ratings, the SSFA formula assumes low default correlation and produces a very large fraction of investment-grade ratings: A specific risk charge of 1.6 percent or below can be assumed to be similar to an investment grade rating, as this is the specific risk charge assigned to investment grade securitizations under Basel.⁵ Based on the SSFA formula a typical residential mortgage backed security (with a risk weight of 50 percent on the underlying mortgage assets) could easily have a specific risk charge of below 1.6 percent for roughly 90 percent of its dollar value.⁶ According to a recent paper from the New York Federal Reserve, 90 percent of residential subprime securitizations between 2001 and 2007 were rated in the top two investment grades, a similar proportion.⁷ As discussed above, the majority of these investment-grade ratings did not perform.

Thus, just as ratings agencies did before the crisis, the SSFA formula implicitly assumes a low correlation between the default probabilities of securitized assets. This is the wrong posture for a regulator to take. Former Moody's analyst Eric Kolchinsky has pointed out that the regulatory backstop (effectively a public put option) for bank assets means that taxpayers are generally exposed at times of extreme economic stress and high default correlation.⁸ Since the purpose of bank regulatory capital is to protect the public from exposure and reduce the moral hazard of the public put option, banks should be required to provision for periods of high default correlation. Capital that is only adequate for periods of low default correlation and ordinary market conditions will fail precisely when it is most needed.

⁵ Investment grade is here defined as either of the two highest ratings, AAA or AA, either of which attracts a 1.6 percent risk charge (CFR 79393, Table 13).

⁶ This calculation is based on the first senior / investment grade tranche having an attachment point at the 10th percentile and a thickness of 10 percent. Securitized assets with a risk weight of 100 percent, such as commercial real estate, could produce a securitization with 80 percent of dollar value in an 'investment grade' capital charge.

⁷ Ashcraft, Adam B., Goldsmith-Pinkham, Paul and Vickery, James I., "[MBS Ratings and the Mortgage Credit Boom](#)" (May 14, 2010). FRB of New York Staff Report No. 449. See Table 1. Alt-A securitizations had a higher proportion of investment-grade assets, at 96 percent.

⁸ Kolchinsky, Eric, "The Ratings Agencies In the Financial Crisis: Incentives and Failures", Seminar at Harvard Business School, December 2, 2011.

In its current form, the procedure to adjust minimum specific risk charges after losses lacks clarity and reliability: Because the capitalization resulting from the SSFA formula is so low for senior tranches, the supervisory minimum risk weight in Table 15 (CFR 79395) bears a heavy burden. The capital for most of the securitization will likely be governed by the 1.6 percent minimum in this table, which will generally exceed the formula value. Yet it is unclear exactly how this will be used. There are several issues that need to be addressed:

- Table 15 states that the supervisory minimum only applies when losses are “greater than” zero. Taken literally, this would mean that it would not apply at origination, allowing banks to hold significantly less capital against senior securitization positions at origination than Basel requires for investment grade securities. This is presumably an oversight and should be corrected, which would set a minimum capital level of 1.6 percent for all tranches.
- The definition of ‘loss’ is unclear. The table refers to “cumulative losses of principal”. In Section 2 of the rule (CFR 79400) ‘cumulative losses’ are defined as “the dollar amount of aggregate losses on the underlying exposures, net of recoveries”, with no reference to principal. It is unclear whether losses include anticipated losses in interest flow (e.g. due to loan restructuring or prepayment). Even more important, given the importance of this capital adjustment as a backstop, it is not clear when exactly a ‘loss’ takes place. Does ‘loss’ refer to the point at which a final loss is determined and booked, or the (much earlier) point at which a shortfall or loss is foreseeable (e.g. delinquency). This should be clarified and the definition of loss should be aligned to the earliest point at which any default is foreseeable. This could potentially be done by defining a ‘loss’ as any impairment of an underlying asset.
- The treatment of resecuritizations under this procedure is unclear. If this procedure applies to resecuritizations, then it would imply that capital held against senior resecuritization tranches is lower than the Basel minimum for resecuritizations. It would also mean that capital held for senior resecuritization positions could be no higher than that held for similar senior securitization positions. If it does not apply, then capital held against resecuritization tranches would not increase as losses in the underlying pool increased. This issue should be clarified in the final rule.

The SSFA formula does not reflect the potential complexity of securitizations: The SSFA formula assumes that the entire relationship between securitization tranches can be summed up in the single metric of subordination of losses. The actual relationship is more complicated. There are generally at least two cash flow “waterfalls”, interest and principal payments, that are divided between tranches, in addition to a separate allocation of losses. Subordination can differ between these flows. Complex arrangements are often made to address prepayment risks, including different maturities for different tranches. Sometimes changes in payment priority can occur if specified conditions take place. Excess spread can be used instead of or in addition to

securitization to provide security to senior tranches.⁹ While it is unclear exactly how these complexities could interact with the SSFA formula, it seems quite possible to design structures where risks do not align with what might appear to be loss subordination. If the Agencies wish the SSFA to be an effective metric of risk, they should restrict the complexity of the securitization structure so that subordination can be measured in the simple and predictable fashion assumed in the SSFA formula.

The SSFA procedure does not take advantage of new loan-level data: Provisions in the Dodd-Frank Act, as well as recent SEC initiatives, should significantly increase the amount and quality of data on underlying securitization assets that are available to investors.¹⁰ This data is not used at all in setting capital charges in the SSFA proposal. To a large extent, this is because the SSFA proposal reflects the standardized approach to setting capital charges under Basel, which does not use exposure-specific data to tailor capital to risks. In the rule the Agencies request comment on whether banks should be permitted to use internal models that presumably would access this data (CFR 79398). However the Agencies correctly note that the use of internal models raises arbitrage concerns. It would be preferable to have an approach that combined the strengths of an external approach with information on the underlying loan-level assets, which is now more available to outside parties.

In addition to these issues, there is a larger question about whether the specific risk capital charges in this proposal are simply too low. As a starting point, it is useful to consider actual historical loss rates on investment-grade structured securities. According to a Moody's analysis, the 5 year loss rates on all structured securities from 1993-2010 classified in the top two investment grades (Aaa and Aa) were 6.25 percent for Aaa securities and a remarkable 38 percent for Aa securities. Total five-year loss rates on investment grade structured securities were over 20 percent.¹¹ Compare this to the 1.6 percent capital that will be reserved against investment grade senior tranches – the vast majority of the securitization -- under the SSFA proposal. Loss rates did vary significantly by type of collateral and securitization structure, indicating that careful attention to these factors can make a difference. But of course the SSFA does not put controls or checks on loan-level collateral quality or securitization structure.

The question of absolute capital levels involve broader issues related to the Basel agreement, as the capital ratios in the SSFA appear to be set to align with the Basel proposal. Nevertheless, given the clear historical record regulators should be seeking opportunities to increase capital charges under the SSFA procedure, and/or restrict eligibility for the SSFA to collateral types and

⁹ For some simple examples, see Nomura Fixed Income Research, "MBS Basics", Nomura Securities, March 31, 2006.

¹⁰ See Securities and Exchange Commission, "[Dodd Frank Rulemaking Spotlight: Asset Backed Securities](#)", Accessed 2/3/12.

¹¹ Moody's Investors Service, "Default and Loss Rates of Structured Finance Securities, 1993-2010", Special Comment, September 30th, 2011.

securitization structures that have demonstrated historical loss ratios compatible with the SSFA outcomes.

Question 13: What are the benefits and drawbacks to using a scaling factor to better align the minimum capital requirements under the SSFA with those generated by the ratings-based approach?

A scaling factor would require case-by-case judgments of the likely outcomes of complex securitization structures. This requires substantial technical skills to do properly and would only be appropriate if the Agencies chose an approach that involved specific provision for third-party or in-house technical analysis of securitizations (see response to Question 19 below). Otherwise such adjustments would be ad hoc and likely heavily affected by lobbying from securitization originators and banks personnel. In addition, from the (incomplete) description in the proposal, it appears that the scaling factor would only be used to lower aggregate capital held against securitizations and could not raise it. It is very dangerous to create such an open-ended potential exemption to capital requirements. This is particularly true since, as discussed above, the current SSFA already assigns low investment-grade capital charges to the vast majority of a securitization.

Question 14: What are the pros and cons of incorporating the concentration ratio into the market risk capital rules as a replacement or alternative to the SSFA?

Question 15: In what instances and for what types of securitization positions should the concentration ratio be used?

The proposed concentration ratio would appear to raise capital charges for the more senior levels of a securitization. It would thus be a valuable corrective to the generous scaling of the SSFA formula. As discussed above, the absolute capital charges for senior securitization positions are much lower than historical loss rates for investment-grade structured securities. This is particularly true in cases where the complexity of the securitization or the weakness of the underlying assets created doubts about the risks associated with more senior tranches. It could also be especially helpful when senior tranches are held on the trading book and are vulnerable to mark-to-market losses in stressed conditions.

Question 19: Given concerns noted above, what would be the advantages and disadvantages of such an approach, particularly relative to the proposed SSFA approach?

AFR believes that an approach that undertakes direct monitoring of asset-backed securities would be far superior to the SSFA approach. Such a direct monitoring approach should combine analysis by third party vendors with monitoring and analysis of vendor work product by agency technical experts. (It is thus incorrect to call it a purely third party approach, as agencies should work closely with vendors). Such a direct monitoring approach would make it possible to examine the actual specifics of a securitization and make use of the new data on underlying

assets made available under the Dodd-Frank Act. It could address the weaknesses in the SSFA discussed above and avoid the many simplifications and possibilities for arbitrage opened up by the ‘one-size-fits-all’ SSFA approach.

In many other questions in this proposal the Agencies express a desire to modify the SSFA approach by introducing more asset-specific details into the process (such as through bank internal modeling or a specific ‘scaling factor’). The direct monitoring approach would give all the benefits of such asset-specific knowledge without exposing the system to arbitrage by regulated entities arguing for lower capital charges. Indeed, such asset-specific approaches should not even be considered unless the agencies build up technical capacity for direct monitoring. Otherwise asset-specific exceptions would simply be an invitation to lobbying and arbitrage by regulated entities which have technical capacities that have not been fully developed within the regulatory system.

The direct monitoring approach is clearly practical on a resource basis. As the proposal points out, the National Association of Insurance Commissioners (NAIC) has, through its Securities Valuation Office, conducted such a direct monitoring approach for some time. In fiscal year 2012, the NAIC spent only \$8.1 million to model 18,000 RMBS CUSIPS and 5,000 CMBS CUSIPS. These represented some \$320 billion in insurance company asset value.¹² The Agencies proposing this rule have combined resources many orders of magnitude higher than the NAIC. In addition, the Office of Financial Research, created solely to improve the quality of financial data available to policymakers, will spend some \$75 million in 2012 and employ almost 200 FTEs. The OFR alone would have the resource capacity to monitor asset quality on the scale of the NAIC program.

The objections raised by the Agencies in the proposal are not credible reasons to reject this approach. Data analysis done by third party vendors paid and supervised by government personnel clearly does not create the conflicts of interest that occur when rating agencies are hired and paid by securities issuers to certify the quality of the product the issuers are selling. Third party vendors can and regularly do develop internal firewalls to keep analyses performed for one customer (in this case, the regulators) from being affected by the interests of other customers. To do otherwise would be to commit fraud. Indeed, the Agencies themselves have regularly employed third party vendors to provide advice on sensitive financial matters.¹³

To address another objection raised in the proposed rule, there is substantial third-party expertise available to support a robust and competitive RFP process and to prevent undue dependence on a single vendor. Financial analysis skills are widespread and there is a large external market for them. For example, the NAIC received 16 detailed responses to its RFP for CMBS analysis. Directories currently list 60 on-campus graduate programs in financial engineering, the majority

¹² National Association of Insurance Commissioners, “[2012 NAIC Proposed Budget](#)”, October, 2011.

¹³ For example, the Federal Reserve employed BlackRock as an investment advisor on the Maiden Lane transactions.

of which would have faculty or graduates with technical skills to perform this type of analysis. Since asset quality for public securitizations is not confidential data, regulators could easily open up the technical analysis process for comments and advice from the community of outside technical experts such as academics, which would be a further check on any possibility of conflicts of interest by vendors.

Prior to the financial crisis, regulators clearly did not understand all the risks of assets held by supervised banks. More in-depth regulatory monitoring of securitizations, assisted by outside vendors, would allow a more accurate understanding of securitization risks and create a better understanding of asset quality across the entire regulatory community. It would also create an invaluable information flow to inform other areas of regulation where credit ratings have been removed from regulatory rules, such as broker-dealer capital requirements.

Question 20: Should banks that are approved to use the advanced approaches be allowed to use the advanced approaches SFA to calculate specific risk-weighting factors for their securitization positions under the market risk capital rules?

Regulated banks clearly face an enormous conflict of interest when calculating their own regulatory capital charges. The entire point of maintaining a standardized approach is to create a safeguard against this conflict of interest. It is ironic that regulators would suggest that a third party vendor hired and monitored on a government contract could not avoid conflicts of interest in analyzing capital charges, and then in the very next question suggest that the regulated entities themselves perform such analyses.

Thank you for the opportunity to comment on this proposed regulation. If you have any questions or concerns, please contact Marcus Stanley, AFR's Policy Director, at (202) 466-3672 or marcus@ourfinancialsecurity.org.

Sincerely,

Americans for Financial Reform

Following are the partners of Americans for Financial Reform.

All the organizations support the overall principles of AFR and are working for an accountable, fair and secure financial system. Not all of these organizations work on all of the issues covered by the coalition or have signed on to every statement.

- A New Way Forward
- AFL-CIO
- AFSCME
- Alliance For Justice
- Americans for Democratic Action, Inc
- American Income Life Insurance
- Americans United for Change
- Campaign for America's Future
- Campaign Money
- Center for Digital Democracy
- Center for Economic and Policy Research
- Center for Economic Progress
- Center for Media and Democracy
- Center for Responsible Lending
- Center for Justice and Democracy
- Center of Concern
- Change to Win
- Clean Yield Asset Management
- Coastal Enterprises Inc.
- Color of Change
- Communications Workers of America
- Community Development Transportation Lending Services
- Consumer Action
- Consumer Association Council
- Consumers for Auto Safety and Reliability
- Consumer Federation of America
- Consumer Watchdog
- Consumers Union
- Corporation for Enterprise Development
- CREDO Mobile
- CTW Investment Group
- Demos
- Economic Policy Institute
- Essential Action
- Greenlining Institute

- Good Business International
- HNMA Funding Company
- Home Actions
- Housing Counseling Services
- Information Press
- Institute for Global Communications
- Institute for Policy Studies: Global Economy Project
- International Brotherhood of Teamsters
- Institute of Women's Policy Research
- Krull & Company
- Laborers' International Union of North America
- Lake Research Partners
- Lawyers' Committee for Civil Rights Under Law
- Move On
- NASCAT
- National Association of Consumer Advocates
- National Association of Neighborhoods
- National Community Reinvestment Coalition
- National Consumer Law Center (on behalf of its low-income clients)
- National Consumers League
- National Council of La Raza
- National Fair Housing Alliance
- National Federation of Community Development Credit Unions
- National Housing Trust
- National Housing Trust Community Development Fund
- National NeighborWorks Association
- National People's Action
- National Council of Women's Organizations
- Next Step
- OMB Watch
- OpenTheGovernment.org
- Opportunity Finance Network
- Partners for the Common Good
- PICO
- Progress Now Action
- Progressive States Network
- Poverty and Race Research Action Council
- Public Citizen
- Sargent Shriver Center on Poverty Law
- SEIU
- State Voices
- Taxpayer's for Common Sense
- The Association for Housing and Neighborhood Development
- The Fuel Savers Club
- The Leadership Conference on Civil and Human Rights
- The Seminal
- TICAS
- U.S. Public Interest Research Group

- UNITE HERE
- United Food and Commercial Workers
- United States Student Association
- USAction
- Veris Wealth Partners
- Western States Center
- We the People Now
- Woodstock Institute
- World Privacy Forum
- UNET
- Union Plus
- Unitarian Universalist for a Just Economic Community

List of State and Local Signers

- Alaska PIRG
- Arizona PIRG
- Arizona Advocacy Network
- Arizonans For Responsible Lending
- Association for Neighborhood and Housing Development NY
- Audubon Partnership for Economic Development LDC, New York NY
- BAC Funding Consortium Inc., Miami FL
- Beech Capital Venture Corporation, Philadelphia PA
- California PIRG
- California Reinvestment Coalition
- Century Housing Corporation, Culver City CA
- CHANGER NY
- Chautauqua Home Rehabilitation and Improvement Corporation (NY)
- Chicago Community Loan Fund, Chicago IL
- Chicago Community Ventures, Chicago IL
- Chicago Consumer Coalition
- Citizen Potawatomi CDC, Shawnee OK
- Colorado PIRG
- Coalition on Homeless Housing in Ohio
- Community Capital Fund, Bridgeport CT
- Community Capital of Maryland, Baltimore MD
- Community Development Financial Institution of the Tohono O'odham Nation, Sells AZ
- Community Redevelopment Loan and Investment Fund, Atlanta GA
- Community Reinvestment Association of North Carolina
- Community Resource Group, Fayetteville A
- Connecticut PIRG
- Consumer Assistance Council
- Cooper Square Committee (NYC)
- Cooperative Fund of New England, Wilmington NC
- Corporacion de Desarrollo Economico de Ceiba, Ceiba PR
- Delta Foundation, Inc., Greenville MS
- Economic Opportunity Fund (EOF), Philadelphia PA
- Empire Justice Center NY

- Empowering and Strengthening Ohio's People (ESOP), Cleveland OH
- Enterprises, Inc., Berea KY
- Fair Housing Contact Service OH
- Federation of Appalachian Housing
- Fitness and Praise Youth Development, Inc., Baton Rouge LA
- Florida Consumer Action Network
- Florida PIRG
- Funding Partners for Housing Solutions, Ft. Collins CO
- Georgia PIRG
- Grow Iowa Foundation, Greenfield IA
- Homewise, Inc., Santa Fe NM
- Idaho Nevada CDFI, Pocatello ID
- Idaho Chapter, National Association of Social Workers
- Illinois PIRG
- Impact Capital, Seattle WA
- Indiana PIRG
- Iowa PIRG
- Iowa Citizens for Community Improvement
- JobStart Chautauqua, Inc., Mayville NY
- La Casa Federal Credit Union, Newark NJ
- Low Income Investment Fund, San Francisco CA
- Long Island Housing Services NY
- MaineStream Finance, Bangor ME
- Maryland PIRG
- Massachusetts Consumers' Coalition
- MASSPIRG
- Massachusetts Fair Housing Center
- Michigan PIRG
- Midland Community Development Corporation, Midland TX
- Midwest Minnesota Community Development Corporation, Detroit Lakes MN
- Mile High Community Loan Fund, Denver CO
- Missouri PIRG
- Mortgage Recovery Service Center of L.A.
- Montana Community Development Corporation, Missoula MT
- Montana PIRG
- Neighborhood Economic Development Advocacy Project
- New Hampshire PIRG
- New Jersey Community Capital, Trenton NJ
- New Jersey Citizen Action
- New Jersey PIRG
- New Mexico PIRG
- New York PIRG
- New York City Aids Housing Network
- NOAH Community Development Fund, Inc., Boston MA
- Nonprofit Finance Fund, New York NY
- Nonprofits Assistance Fund, Minneapolis M
- North Carolina PIRG
- Northside Community Development Fund, Pittsburgh PA

- Ohio Capital Corporation for Housing, Columbus OH
- Ohio PIRG
- OligarchyUSA
- Oregon State PIRG
- Our Oregon
- PennPIRG
- Piedmont Housing Alliance, Charlottesville VA
- Michigan PIRG
- Rocky Mountain Peace and Justice Center, CO
- Rhode Island PIRG
- Rural Community Assistance Corporation, West Sacramento CA
- Rural Organizing Project OR
- San Francisco Municipal Transportation Authority
- Seattle Economic Development Fund
- Community Capital Development
- TexPIRG
- The Fair Housing Council of Central New York
- The Loan Fund, Albuquerque NM
- Third Reconstruction Institute NC
- Vermont PIRG
- Village Capital Corporation, Cleveland OH
- Virginia Citizens Consumer Council
- Virginia Poverty Law Center
- War on Poverty - Florida
- WashPIRG
- Westchester Residential Opportunities Inc.
- Wigamig Owners Loan Fund, Inc., Lac du Flambeau WI
- WISPIRG

Small Businesses

- Blu
- Bowden-Gill Environmental
- Community MedPAC
- Diversified Environmental Planning
- Hayden & Craig, PLLC
- Mid City Animal Hospital, Pheonix AZ
- The Holographic Repatterning Institute at Austin
- UNET

