



November 30, 2021

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Comment on FTC's Draft Strategic Plan for 2022-2026

To Whom It May Concern:

Thank you for the opportunity to provide comments on the Federal Trade Commission's Draft Strategic Plan for 2022- 2026. The Neighborhood Reinvestment Corporation (dba NeighborWorks America) is a Congressionally chartered nonprofit organization established in 1978. We applaud the FTC for seeking public comment on your Strategic Plan and with this letter are providing feedback on Goal 1: Protecting the public from unfair or deceptive acts or practices in the marketplace.

Please note that these comments have not been submitted to or approved by NeighborWorks America's Board. The comments reflect the views of NeighborWorks management and do not necessarily represent the views of its Board members, either collectively or as individuals.

NeighborWorks supports a network of nearly 250 local and regional nonprofit affiliated housing and community development organizations. We provide grants, training and technical support to our network organizations (NWOs) that, in turn, provide financial capability and homeownership counseling, among many other services. In FY 2020, NWOs served more than 149,000 individuals with financial counseling, pre-purchase & post-purchase homeownership counseling and foreclosure intervention counseling.

The economic impact of COVID-19 has made housing security even more tenuous for many Americans, and particularly for low-income and minority communities. Over the last nearly two years, the pandemic has exacerbated scam activities on multiple fronts. In response to NeighborWorks' surveys, between 40 and 50 percent of network organizations reported an increase in scam activity in their service area, compared to pre-COVID-19. Many families seeking solutions to their financial challenges have found themselves at risk of being taken advantage of through questionable programs and unscrupulous actors. While counselors are a trusted source for assisting in avoiding scams, more support is always needed to prevent consumers—particularly from vulnerable, low-income, and historically underserved and marginalized communities—from falling victim to fraudulent and deceptive scam activities.

With this danger in mind, NeighborWorks enthusiastically supports the FTC's Objectives 1.1 and 1.2, which continue the focus of the Commission on protecting the public from unfair or deceptive acts or practices in the marketplace by identifying, investigating, taking actions against, and deterring unfair or deceptive acts or practices. Our experience with the Commission as a trusted partner in fighting scams is rooted in the work of the multi-faceted campaign to prevent loan scams, which was created during the Great Recession. More recently, in January of 2021, NeighborWorks launched StopHomeScams.org to empower homeowners and renters to combat housing scams to help protect consumers against foreclosure and eviction. StopHomeScams.org is a national public education initiative led by NeighborWorks with support from the Wells Fargo Foundation, National Fair Housing Alliance, and National Foundation for Credit Counseling designed to help protect consumers by empowering them to take action and protect their home and community from scammers. The FTC's continued commitment to preventing consumer scams is critical.

Further, in Objective 1.2, the FTC has prioritized maintaining strong relationships with community-based organizations and advocacy organizations nationwide, while continuously seeking new ways to build relationships with trusted community leaders. NeighborWorks stands ready to continue our partnership with the FTC while serving as a bridge to our network of excellence, with NWOs serving communities in every state, the District of Columbia and Puerto Rico. Success in our communities is driven by resident engagement and we encourage the FTC to engage with nonprofits working closely with resident leaders to develop effective materials and outreach activities that will successfully counter deceptive actors. Maintaining close relationships with local organizations will enable the FTC to access real-time, on-the-ground information about trends and challenges facing communities. Coordination with campaigns such as our StopHomeScams initiative can also yield social media and other amplification in traditional and non-traditional outlets that will build knowledge and awareness of scams and actions to safeguard consumers.

NeighborWorks also appreciates Objective 1.4 of the FTC's Strategic Plan which focuses on advancing all forms of equity, including racial equity, as well as support for underserved and marginalized communities. Many communities are unaware of national organizations and federal agencies that support and protect consumers. Nonprofits like NeighborWorks and our network organizations can be key partners in amplifying the FTC's Every Community Initiative resources. The agency may also want to consider expanding the partners it has envisioned for the Community Advocate Center Initiative to include counseling organizations, not just local community legal aid organizations. The Strategic Plan would be improved if it were to call out more specific target areas for service and partnership, such as Native American communities or remote rural areas that are often not the focus of educational messaging.

Thank you again for the opportunity to comment on the FTC's 2022-2026 Strategic Plan. We look forward to continuing to partner and work with you on our shared missions of supporting underserved and marginalized communities and preventing people from becoming victims of scams. If you have any questions about this comment, please feel free to reach out to Kirsten Johnson-Obey, Senior Vice President of Public Policy and Legislative Affairs at (202) 760-4000.

Sincerely,

A handwritten signature in black ink that reads "Marietta Rodriguez". The signature is written in a cursive, flowing style.

Marietta Rodriguez
President & CEO, NeighborWorks America