

Governor Lamont issued his executive order declaring a public health emergency on March 16, 2020

While our primary role is as regulator, the Department doesn't generally tell how our regulated entities how to run their businesses, we do ensure that federal and state laws are adhered to. For example, while we don't tell a bank how they operate, we make sure they do so in a safe and sound manner that protect consumers. During this unusual situation which none of us have experienced in our lifetimes, the Department has issued guidance to our regulated industries and has worked both with businesses and consumers in ways we would normally not have done. The Department has responded quickly as the pandemic unfolded.

- (March 9) Issued no action policy for all licensees for employees telecommuting rather than working at a branch office, as required – including all of mortgage, sales finance companies, small loan companies, collection agencies, etc. , this has been extended through June 30.
- (March 17) The Department issued guidance urging Connecticut state-chartered banks and credit unions to work with borrowers consistent with safe and sound banking practices. These efforts can include easing credit terms for new loans, waiving overdraft fees, waiving late fees for loan balances, increasing the number of allowed money market withdrawals, waiving CD early withdrawal penalties, and offering payment accommodations such as allowing borrowers to defer some payments or extending the payment due dates.
- (March 17) The Department also asked institutions to communicate with their partner companies, like servicers and collection agencies, so consumers and small businesses know all possible accommodations.
- (March 19) Issued press release assuring consumers that their money was safe in federally insured financial institutions
- (March 19) The Department urged mortgage servicers to discuss borrower's ability to make loan repayments at this time to mitigate any current or potential foreclosure actions consumers may face. Servicers should consider waiving late fees, and inform homeowners of forbearance plans they offer and any other deferment options that may be available to consumers.
- (March 19) The Department also requested that mortgage servicers consider providing guidance to their internal and external collection teams regarding the servicer's policies at this time
- (March 20) Extended certain reporting and filing deadlines with the Department (Call reports and financial statement filings)
- (March 25) Paperless Submission of securities registration, exemption and covered security filers, as well as business opportunity registration filers and for the foreseeable future, the Division is now giving them the option of making their filings and payments electronically
- (March 31) Announced Mortgage Relief Program in collaboration with CBA and CULC. Over 50 participating institutions for non-federally backed mortgages. Extension announced June 4th.

- (April 9) Extension of certain filing and reporting for Connecticut registered investment advisors
- (April 10) Governor Lamont's executive order allows renters to use security deposits in excess of one month's rent to be used for April and May Rental payments.
- (April 16) Connecticut financial institutions are strongly urged to not use a stimulus payment to satisfy an overdraft that existed prior to a stimulus payment being deposited to the account, or to exercise rights of offset against the account with respect to other debts, for 30 days from the date the stimulus payment is deposited to the account, without express agreement of the customer or member.
- (April 21, 2020) Student Loan Servicer Agreement (Worked with ten other states)
Connecticut residents with commercially owned Federal Family Education Loan Programs or privately held student loans who are struggling to make their payments due to the COVID-19 pandemic will be eligible for expanded relief. Borrowers in need of assistance should immediately contact their student loan servicer to identify the options that are appropriate to their circumstances. Relief options through the servicers listed below include:
 - Providing a minimum of 90 days of forbearance
 - Waiving late payment fees
 - Ensuring that no borrower is subject to negative credit reporting
 - Ceasing debt collection lawsuits for 90 days
 - Working with borrower to enroll them in other borrower assistance programs, such as income based repayment.
- (June 4) Extension of Mortgage Relief Program

Other Notes:

- The Department continues to maintain a comprehensive website with links to appropriate external resources.
- The Department maintains all pages in English and Spanish and looking to expand to other languages (e.g. Portuguese and Polish)

Legislative Notes:

- Seeking Revision to Student Loan Servicers
- H.B. No. 5430 (raised) an act concerning computer crimes against financial institutions and their customers. This bill makes clear that computer crimes include attacks (1) that involve any computer, computer network or computer software that is owned, leased or licensed by a financial institution, and (2) targeted at the money, property or personal information of customers that is being held by a financial institution in connection with a loan or deposit account, or in a fiduciary, trust or custodial capacity