

## PAUL ROTHSTEIN

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Bureau of Consumer Financial Protection  
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### EDUCATION

Ph.D., Economics, University of California at Berkeley, Berkeley, CA  
B.A., Economics and Political Science, Yale University, New Haven, CT

### FIELDS OF INTEREST

Public Sector Economics, Applied Microeconomics, Regulation, Consumer Finance and Policy

### PROFESSIONAL EXPERIENCE

#### ❖ Office of Research, Bureau of Consumer Financial Protection, Washington, DC

##### • Acting Deputy Assistant Director, Office of Research (May 2019—present)

Manage and review Research Office work on rulemaking, including the analysis of benefits and costs. Manage the relationships and communications with Division and Bureau leadership associated with rulemaking work. Generally support the Acting Assistant Director in maintaining strong relationships with internal and external partners, and ensuring strong resource and project management within the Office.

##### • Team Member (March 2015 – November 2015), Team Lead (November 2015 – October 2016), and Executive Sponsor (October 2016 – January 2019), Program for the Assessment of Significant Bureau Rules

Designed and managed, with Division executives, the program for the retrospective review of significant Bureau rules, as mandated by Dodd-Frank Act section 1022(d) (“Assessments”).

- Developed strategic options for defining “significant rule” for purposes of Assessments, and recommended a specific test with four factors. For the three early Bureau rules determined to be significant rules—Remittances, Mortgage Servicing, and Ability-to-Repay—contributed to the development of strategic options for the scope of each assessment. Contributed to the development of strategic options for the data and metrics to be used in measuring the potential beneficial effects and risks of each rule. From March 2016 through September 2017, collaborated with the Deputy Associate Director for RMR in writing seven memos to the Director; personally briefed the Director three times (March 2016, June 2016, and January 2017) on the strategic options for scope, metrics and data and on the test for a significant rule. The Director approved all significant-rule determinations and most recommendations for scope, metrics and data.
- Collaborated with the Legal Division in developing the test for a significant rule and the scope of each assessment, to ensure legal sufficiency and to minimize legal risk. Collaborated with the Deputy Associate Director for RMR to prepare annual work plans and staffing models for assessments. Work plans and staffing were integrated into Bureau strategic planning, including the One Bureau planning process.
- Launched and help manage three highly-effective teams, one for each assessment; two teams launched in October 2016 and one in December 2016. Each team had a diverse staff from Research, Regulations, and the relevant Markets office (in total approximately 15 core staff and 10 additional staff) with a Team Lead from the Office of Research and a Steering Committee. Served as Steering Committee chair for Mortgage Servicing and Ability-to-Repay, and as Steering Committee member for Remittances.

Held twice-monthly joint meetings with the three Team Leads, sometimes with Division leadership, to promote knowledge-sharing across teams and operational efficiency.

From December 2017 through February 2018, worked with the Chief Data Officer and Division Leadership to obtain exceptions to the data freeze in light of the statutory deadlines for the assessment reports.

From June 2018 to January 2019, established and maintained the unified production schedule for drafting the three assessment reports, to ensure that all reports are completed on time.

The report of the Remittance Rule assessment was timely published on October 26, 2018. The reports of the Servicing Rule assessment and ATR/QM Rule assessment were timely published on January 10, 2019.

- Demonstrated communication skills in persuasively representing the Bureau in policy development and execution, by representing the Bureau in four engagements with the GAO that covered Assessments or the retrospective review of rules generally (GAO-15-185, GAO-16-448, GAO-18-213, GAO-19-158). Met with representatives of the GAO—in person or over the phone—at least once for each engagement, from 2015-2018. Generally explained the purposes of Assessments, the Bureau process and plans for Assessments, and the role of Assessments in future policy development.

Represented RMR in presenting plans for Assessments to Bureau leadership, at Bureau Policy Committee, two times (July 2015 and February 2017).

Collaborated with the three Team Leads in drafting three Federal Register notices announcing each Assessment, describing the Assessment plan, and requesting feedback from the public. One Federal Register notice was issued in March 2017 and two in May 2017. Participated with the Team Leads in stakeholder calls when the Bureau issued the Federal Register notices.

Presented on Assessments to the Bureau's Community Bank Advisory Council (April 2017), Credit Union Advisory Council (May 2017), and Consumer Advisory Board (June 2017). As above, generally explained the purposes of Assessments, the Bureau process and plans for Assessments, and the role of Assessments in future policy development. Conducted follow-up phone calls.

- **Section Chief, Financial Institutions and Regulatory Policy (November 2013 – present)**

Lead a team currently staffed by 5 PhD economists and 3 research assistants. Develop annual performance plans and conduct midyear and annual performance evaluations. Support the development of my team as subject matter experts, skilled and reliable analysts, and strong communicators.

- Assign and review section work on the benefits, costs and impacts of Bureau rules pursuant to Dodd-Frank section 1022(b)(2). Section work has focused mostly on mortgage originations, mortgage servicing, prepaid accounts, mandatory arbitration, and debt collection. Provide feedback on research by the economists on consumer financial behavior, household finance, and the markets for consumer financial products and services. Support the delivery of research findings to diverse stakeholder communities through publication and other outreach.
- Since January 2019, manage and review Research Office work on the development of a regulation on Property Assessed Clean Energy (PACE) financing and amendments to the Bureau's Ability-to-Repay/Qualified Mortgage and Remittance Transfer rules.
- Since February 2017, serve as the RMR representative to the Bureau's Data Governance Board. Contributed to the development of the Bureau's new Data Access Policy. Worked closely with RMR stakeholders and representatives of the Chief Data Officer to ensure that the new policy supported the data needs of RMR.
- Since January 2014, manage the renewal of information collections that are mandated by Bureau regulations. In the first two years, oversaw the development and implementation of a practical methodology for estimating burden and renewed over twenty information collection, on time, as required under the Paperwork Reduction Act. Delivered timely and high-quality data to the stakeholder community about the costs of these information collections.

- From June 2014 through November 2014, envisioned and organized, with two colleagues from academia, an Office of Research Workshop on benefit-cost analysis of consumer protection regulation. The Workshop was held on November 20<sup>th</sup>, 2014, and had five panels and thirty panelists from academia, industry and other government agencies.

- **Senior Economist (May 2011 – November 2013)**

- March 2013 through November 2013, part of a Bureau team studying the costs of compliance from certain Bureau regulations on consumer deposit accounts. Visited five banks across the country, interviewed bank staff and collected data and other information, and helped draft portions of the final study. The study was issued in November 2013.
- Produced the cost-benefit analyses required under Dodd-Frank section 1022(b)(2) for the Bureau rule on international consumer remittance transfers (issued January 2012) and the two rules on mortgage loan servicing (both issued January 2013).
- Part of the team that drafted the Bureau's initial policies and procedures for conducting the cost-benefit analysis required under Dodd-Frank section 1022(b)(2), September 2011 through December 2011.
- Joined the Bureau as the second economist in the Office of Research in May 2011. Recruited the initial group of economists and supporting analysts. Developed position descriptions and internal policies.

- ❖ **Division of Consumer Protection, US Federal Trade Commission, Washington, DC**

- **Economist (GS15-10) (July 2008 – May 2011)**

- Assessed options for estimating costs to consumers due to excess fees and charges, and helped estimate these costs, in an enforcement action against Countrywide mortgage servicing (\$108 million dollar settlement).
- Assessed options for estimating costs to consumers due to deceptive business practices, and helped estimate these costs, in an enforcement action against LifeLock (\$12 million settlement).
- Provided economic analysis of the potential benefits and costs to consumers, firms and markets in numerous other enforcement actions for violations of the Fair Credit Reporting Act, the Credit Repair Organizations Act, and the FTC Act.
- Drafted, with one co-author, a 2010 report to Congress describing a methodology for researching the accuracy of consumer reports and the consumer harm from errors in credit reports. Developed the statistical sampling methodology and helped develop the privacy methodology used in the field research, the results of which were presented in the 2012 report to Congress.
- Co-organizer of the 2009, 2010 and 2011 annual FTC-Northwestern University Microeconomics Conference.
- Represented the FTC as an advisor in consumer protection during a one-week mission to the Superintendencia de Industria y Comercio in Bogota, Colombia.

❖ **Washington University in St. Louis, St. Louis, MO**

- **Department of Economics, Assistant Professor (July 1988 – June 1994) and tenured Associate Professor (July 1994-June 2008)**
  - Conducted independent and original research in economics and public policy. Published work on the estimation of consumer demand for local public goods, the financing of local public education, and the theory of federal and regional spending and taxation. Published fifteen refereed papers and five additional papers in professional journals.
  - Communicated research findings as an invited speaker at professional conferences and university seminars.
  - Served on twenty-one doctoral committees and mentored these students toward the successful completion of their dissertations. These individuals work in governments and universities all over the world.
  - Developed, taught and managed the teaching assistants for three graduate courses and five undergraduate courses, each taught many times, with class sizes ranging from five to two-hundred. Central topics included the theory of markets, the role of public policy, the balance between federal and state policy, cost-benefit analysis, and the measurement of consumer welfare.
  - Regularly reviewed, edited, and commented on the work of other professional economists as a journal referee (approximately 100 reports), conference discussant, and faculty colleague.
  - Served as Director of graduate admissions (1996-99 and 2000-01), member of the senior faculty recruiting committee (2005-06), and member of the junior faculty recruiting committee (2006-07). In 2004, co-chaired an interdisciplinary university committee to address questions that arose during University re-accreditation.
- **Associate Director, Murray Weidenbaum Center on the Economy, Government and Public Policy (January 2001 – June 2008)**
  - Collaborated with the Director of the Center to transform an existing center into a leading sponsor of University research in economics and political science and a sponsor of public engagement with research. Helped redefine the roles and responsibilities of the remaining staff (4 people) to support the new mission.
  - Regularly communicated the vision and progress of the Weidenbaum Center to University leadership, University faculty and major donors.
  - Collaborated with the Director of the Center in allocating over \$125,000 annually in research grants to faculty in Economics and Political Science.
  - Collaborated with the Director of Center Programs in designing and managing ten day-long conferences for the general public on topics ranging from Medicaid financing, the use of excise taxes to influence consumer behavior, the economics of urban sprawl, and the economics of public education.
- **Economics Coordinator, University College (July 1999 – June 2005)**
  - Collaborated with economists at the Federal Reserve Bank of St. Louis in designing and implementing a five course certificate program in financial services for the evening division of Washington University (“University College”). Recruited a diverse staff of Bank economists, community practitioners, University faculty and graduate students and oversaw their performance.
  - After 3 years, grew the offerings and enrollment from approximately five classes with six students each to eight classes with twelve students each.

❖ **Department of Economics, University of Texas at Austin, Austin, TX**

- **Instructor of Economics with courtesy appointment in the Department of Government (July 1987 – June 1988)**
  - Taught graduate and undergraduate public sector economics, prepared dissertation chapters for submission.

**TEMPORARY POSITIONS**

Visiting Associate Professor, Department of Economics, Duke University, Durham, NC (July 2007 – June 2008).

Visiting Associate Professor, W. Allen Wallis Institute of Political Economy, University of Rochester, Rochester, NY (January 1995 – June 1995).

Post-doctoral Fellow in Political Economy, Graduate School of Industrial Administration, Carnegie-Mellon University, Pittsburgh, PA (July 1989 – June 1990).

**PUBLICATIONS AND OFFICIAL REPORTS**

“The Analysis of Benefits in Consumer Protection Regulations” (with Howell E. Jackson), *Harvard Business Law Review*, forthcoming.

“Consumer Financial Protection,” Chapter 18 in Steven Payson (ed.), *Public Economics in the United States: How The Federal Government Analyzes and Influences the Economy*, 2014, Praeger/ABC-CLIO Publishers, pp. 445-472.

“Report to Congress Under Section 319 of the Fair and Accurate Credit Transactions Act of 2003” (listed contributor), December 2012, U. S. Federal Trade Commission.

“A Review of Food Marketing to Children and Adolescents, Follow-Up Report” (listed contributor), December 2012.

“Report to Congress Under Section 319 of the Fair and Accurate Credit Transactions Act of 2003” (listed with Peter Vander Nat), December 2010.

“Commentary” (on “States in Fiscal Distress” by Robert Inman), *Regional Economic Development*, Vol 6, 2010, pp. 81-87.

“Discontinuous Payoffs, Shared Resources, and Games of Fiscal Competition: Existence of Pure Strategy Nash Equilibrium,” *Journal of Public Economic Theory*, Vol. 9, 2007, pp. 335-368.

“Transferable Tax Credits in Missouri: An Analytical Review” (with Nathan Wineinger), *Regional Economic Development*, Vol. 3, 2007, pp. 53-74.

“The ‘Takings’ of Prosperity? Kelo v. New London and the Economics of Eminent Domain” (with Tom Garrett), *The Regional Economist*, January 2007, pp. 5-9.

“Group Welfare and the Formation of A Common Labor Market: Some Global Results” (with Gary Hoover; lead article), *International Tax and Public Finance*, Vol. 13, 2006, pp. 3-23.

“Possibility, Impossibility and History in the Origins of the Marriage Tax” (with Marcus Berliant; lead article), *National Tax Journal*, Vol. 56, 2003, pp. 303-317.

“On Models with an Uncongestible Public Good and a Continuum of Consumers” (with Marcus Berliant), *Journal of Urban Economics*, Vol. 48, 2000, pp. 388-396.

Review of Democratic Choice and Taxation by Walter Hettich and Stan Winer (Cambridge University Press), *Canadian Journal of Economics*, Vol. 33, 2000, pp. 587-590.

“A Dynamic Model of Loss, Retirement, and Tenure in the U.S. House of Representatives” (with John B. Gilmour), *Journal of Politics*, Vol. 58, 1996, pp. 54-68.

“Term Limitation in a Dynamic Model of Partisan Balance” (with John B. Gilmour), *American Journal of Political Science*, Vol. 38, 1994, pp. 770-796. Reprinted as Chapter 9 in, *Legislative Term Limits: Public Choice Perspectives*, Bernard Grofman editor, Kluwer Academic Publishers, 1996.

“Learning the Preferences of Governments and Voters from Proposed Spending and Aggregated Votes,” *Journal of Public Economics*, Vol. 54, 1994, pp. 361-389.

“Decentralization and Changing Fiscal Rules in the Japanese Local Public Sector,” *Public Finance/Finances Publiques*, Vol. 48, 1993, pp. 110-131.

“Early Republican Retirement: a Cause of Democratic Dominance in the House of Representatives” (with John B. Gilmour), *Legislative Studies Quarterly*, Vol. 18, 1993, pp. 345-365.

“Foundations of Logit in Economic Models of Voting in Referenda,” *1993 Proceedings of the Business and Economic Statistics Section*, American Statistical Association, pp. 137-142.

“The Demand for Education with ‘Power Equalizing’ Aid: Estimation and Simulation,” (lead article), *Journal of Public Economics*, Vol. 49, 1992, pp. 135-162.

“Representative Voter Theorems,” *Public Choice*, Vol. 72, 1991, pp. 193-212.

“The Algebra of a Class of Transformations with Applications to Log-Log Models of School Spending,” *Public Finance Quarterly*, Vol. 19, 1991, pp. 457-465.

“Profit and Expenditure Functions in Basic Public Finance: A Correction,” *Economic Inquiry*, Vol. 29, 1991, pp. 180-181.

“Order Restricted Preferences and Majority Rule,” *Social Choice and Welfare*, Vol. 7, 1990, pp. 331-342.

“State Aid, Politics, and the Econometrics of the Demand for Education,” *NTA-TLA Proceedings--1989*, National Tax Association, pp. 209-216.

## **PROFESSIONAL RECOGNITION**

CFPB Superior Achievement Award for the Program for the Assessment of Significant Bureau Rules, 2019.

Washington University Graduate Student Senate Award for Graduate Student Mentoring, 2001.

National Tax Association Annual Dissertation Competition., second place prize winner, 1989.

## **GRADUATE STUDENT DISSERTATION COMMITTEES AND FIRST APPOINTMENT**

Tomasz Skladzien (as chair), Economist, Australian Department of the Treasury.

Jeremy Jackson, Visiting Assistant Professor, Vassar College.

James Butikofer, Economist, Employee Benefits Security Administration, U.S. Dept. Labor.

Jeremy Groves (as chair), Assistant Professor, Northern Illinois University (DeKalb).

Mindy Marks (as chair), Assistant Professor, University of California (Riverside).

Janice Compton, Assistant Professor, University of Manitoba.

Eric Isenberg, Assistant Professor, DePauw University.

Fan-Chin Kung, Assistant Professor, Academia Sinica.

Noel Johnson, Assistant Professor, California State University (Long Beach).

Dusan Stojanovic, Federal Reserve Bank of St. Louis.

Xiaoning Cheryl Long, Assistant Professor, Colgate University.

Barry Jones, Assistant Professor, SUNY (Binghamton).

Mingmei Jones, Assistant Professor, SUNY (Binghamton).

Gary Hoover (as co-chair), Assistant Professor, University of Alabama (Tuscaloosa).

Huibin Yan, Assistant Professor, University of California (Santa Cruz).

Tim Iijima, Ernst and Young.

Mansor Ibrahim, Assistant Professor, International Islamic University of Malaysia.  
Lorena Alcazar, Visiting Scholar, The Brookings Institution.  
Thomas Sai-Fan Chan, Nevada Public Utilities Commission.  
Andy Rutten, Assistant Professor (Political Science), Cornell University.  
Brian Marks, Economist, Federal Trade Commission.

## **PREPARED COURSES**

Graduate Public Finance (Empirical Topics).  
Graduate Public Finance (Taxation/Local Public Sector).  
Market Failures and State Institutions (graduate inter-disciplinary course).  
Public Finance (undergraduate).  
Federalism and the Economics of Public Policy (writing intensive).  
Price Theory.  
Introductory Macroeconomics.  
Introductory Microeconomics.

## **RESEARCH PRESENTATIONS (SEMINARS AND CONFERENCES; SINCE 1996)**

“The Analysis of Benefits in Consumer Protection Regulations”  
November 2017, Harvard Law School (guest speaker in curriculum seminar)  
March 2015, Harvard Law School (Olin Seminar)  
March 2015, Society for Benefit-Cost Analysis  
October 2014, Kennedy School of Government

“Consumer Financial Protection”  
May 2013, Society of Government Economists

“States in Fiscal Distress”  
April 2010, Federal Reserve Bank of St. Louis-Washington University in St. Louis, Conference on State and Local Government Finance Amid Economic Turbulence.

“Compensation for Deception about Quality”  
October 2008, U.S. Federal Trade Commission

“Up To Par? Prices, Policies and Players in the Market for State Tax Credits”  
February 2008, U.S. Office of Management and Budget  
February 2008, U.S. Government Accountability Office (Washington, DC)

“Transferable Tax Credits in Missouri: An Analytical Review”  
May 2007, Federal Reserve Bank of St. Louis “BERG” Conference

“Fiscal Cooperation, Regional Attractiveness, and the Permission to Tax”  
March 2007, University of Colorado—Boulder  
April 2007, Northern Illinois University—DeKalb  
February 2006, University of Kentucky—Lexington  
October 2005, University of Alabama—Tuscaloosa

“Discontinuous Payoffs, Shared Resources, and Games of Fiscal Competition”  
June 2005, Society for the Advancement of Economic Theory  
April, 2005, Midwest Economic Theory Meetings  
July 2004, Academia Sinica (Taipei)  
July 2004, Society for Social Choice and Welfare meetings (Osaka)  
March 2004, CERGE-EI (Prague)  
March 2004, University of Warwick

“Fiscal Cooperation and the Permission to Tax”  
November 2003, Regional Science Association meetings  
June 2003, Association of Public Economic Theory meetings

- “Mobile Resources, Fiscal Institutions, and the Race to the Bottom”  
February 2003, Washington University in St. Louis
- “Treks in the City: A Political Economy of Urban Mass Transportation”  
March 2002, Public Choice Society meetings  
October 2001, Washington University in St. Louis
- “The Effects of Federation Formation and Dissolution on Regional Social Welfare: Some Global Results”  
October 2001, Tulane University  
September 2000, Duke University  
May 2000, Washington University in St. Louis
- “Possibility and Impossibility in the Creation of the Marriage Tax”  
March 2000, Washington University in St. Louis  
March 2000, University of Illinois – Champaign
- “A Positive Model of the Permission to Tax in Regional Public Finance”  
January 1999, American Economic Association  
October 1997, University of Kentucky  
June 1998, Econometric Society  
July 1998, Stanford University (SITE Conference)
- “Redistribution and the Creation and Governance of a Common Labor Market”  
March 1998, Washington University  
March 1998, Public Choice Society
- “A Political Economy of the Permission to Tax in Multi-Tiered Government”  
February 1997, University of Illinois – Champaign  
March 1997, University of Michigan - Ann Arbor  
May 1997, University of Arizona – Tucson  
May 1997, Washington University in St. Louis:  
February 1996, Political Economy Conference, Washington University in St. Louis  
March 1996, Public Choice Society.

## REFERENCES

Available on request.