

RICH FEUER ANDERSON

# May 2023 Outlook

May 8, 2023

<p><b>OVERVIEW</b></p>	<p>Congress is gearing up for a robust month of May following a condensed April calendar, with the Senate in session for fifteen days and the House for twelve. Given the recent collapse of First Republic Bank and JPMorgan’s purchase of most of its assets, there will be continued attention on the resiliency of the banking sector and further examination as to what caused the recent collapses. Additionally, the X-date continues to loom over lawmakers as Treasury Secretary Yellen announced that the U.S. could hit the debt limit as early as June 1<sup>st</sup>. With no compromise on the debt ceiling in sight, we expect negotiations to significantly ramp up this month as pressure mounts on both President Biden and House Republicans to ensure the U.S. does not default on its debt for the first time in history.</p> <p>These issues will be top of mind in Washington D.C., as well as the regular cadence of Congressional activities, such as the appropriations and National Defense Authorization Act (NDAA) processes, as well as several Congressional hearings, which will include appearances from the prudential regulators. Below, RFA has provided our take on notable activity at the legislative, regulatory, and administrative levels for the upcoming May work period.</p>
<p><b>CONGRESSIONAL ACTIVITY</b></p>	<p>This month will be jam-packed with congressional activity on various policy fronts. The Senate will start the week by invoking cloture on several nominations, including Mr. L. Felice Gorordo to be the United States Alternative Executive Director of the International Bank for Reconstruction and Development and Ms. Glenna Lauren Wright-Gallo to be Assistant Secretary for Special Education and Rehabilitative Services. Last week, the Senate voted to confirm a number of district judges as well as invoke cloture on Ms. Colleen Shogan to be Archivist of the United States. We expect the Senate to stick to its regular cadence of hearings and votes on nominations, although this is complicated by Sen. Feinstein’s (D-CA) continued absence due to illness. It is worth noting that frustration is growing within parts of the Democratic caucus, with some members like Rep. Khanna (D-CA) calling for her to resign. We expect pressure to ramp up if Feinstein’s absence continues, especially considering the backlog of judicial nominees. All the while, the Senate Appropriations Committee will ramp up a series of Subcommittee hearings with Cabinet officials regarding FY2024 budget requests. Furthermore, the House will reconvene today after being out last week. Work will begin in earnest on the FY2024 NDAA in the House Armed Services Subcommittees starting on Thursday, with a full Committee markup scheduled for May 23<sup>rd</sup>. The Senate Armed Services Committee will also likely begin their markup process in the coming weeks.</p> <ul style="list-style-type: none"> <li>• In addition to robust Banking, Finance, Ways and Means, and Financial Services Committee agendas (more below), we are monitoring several other hearings this month. The House Oversight and Accountability Committee plans to hold its first hearing on Environmental, Social and Governance Practices (ESG) focused on examining ESG with Attorneys General. The hearing is expected to be the first in a series that examines ESG priorities, and we expect Chair Comer (R-KY) to be critical of asset managers and what he sees as “activist shareholders shaping corporate behavior.” The House Rules Committee also plans to hold a hearing on China’s coercive economic practices this week, which will likely focus on China’s anticompetitive trade policies and could touch upon China’s influence on U.S. corporations. Furthermore, the House Foreign Affairs</li> </ul>

Subcommittee on Oversight and Accountability will hold a hearing reviewing the Bureau of Industry and Security's use of export controls. The hearing will likely discuss the limitations of current export control regimes and export controls concerning China. Republicans will also likely discuss the Administration's executive order on outbound investments, which has been in the works for months and is likely to be issued this month.

- In the Senate, the Budget Committee held a hearing last week to criticize the GOP debt limit bill, known as the Limit, Save, Grow Act of 2023. The bill passed out of the House at the end of April and is dead on arrival in the Senate. As expected, Democrats lambasted the proposal for seeking to reverse President Biden's clean energy tax credits and rescind extra funding for the IRS, among other things (more on the debt ceiling below). Other hearings on our radar include the Senate Budget Committee's third hearing of the year on climate change, entitled "Lessons Learned: Leadership Perspectives and Experience on the National Costs of Climate Change." The witnesses will be former Australian Prime Minister Turnbull and Former Senate Majority Leader Bill Frist. We expect Republican attendance to be sparse, given the prior attendance record for the last two hearings. Additionally, the Senate Agriculture Committee will hold a nomination hearing to consider Ms. Xochitl Torres Small to be Deputy Secretary of Agriculture. Former Congresswoman Torres Small previously served as the Under Secretary of Agriculture for Rural Development and was confirmed by voice vote in the Senate in October 2021. Also, the Senate Energy and Natural Resources Committee will hold a hearing to examine permitting reform. Chair Manchin (D-WV) will continue to push for his permitting reform proposal, which he formally introduced last week, entitled the Building American Energy Security Act of 2023. While Sen. Manchin tried incorporating the legislation into the FY23 NDAA (with support from 40 Democrats and 7 Republicans) it was ultimately left out of the defense bill. We expect this legislation to be a starting point for upcoming negotiations on permitting reform and for this to be a priority for Sen. Manchin going forward, regardless of whether he decides to run for re-election in 2024.
- Regarding digital assets, while it was reported that Sens. Lummis (R-WY) and Gillibrand (D-NY) would release a new draft of their Responsible Financial Innovation Act in April, that timeframe has been pushed back. We expect a draft of the bipartisan crypto bill, which will have legislative changes given the collapse of FTX, to be released sometime in the coming weeks.
- Regarding artificial intelligence (AI), Majority Leader Schumer (D-NY) is spearheading legislative efforts on the issue and recently circulated a high-level framework. Last week, he gave a speech on the Senate floor underscoring the importance of addressing AI in a bipartisan way, mentioning that he is working with several of his Republican colleagues in the Senate on the matter. This comes on the heels of ChatGPT's growing user popularity and Snapchat's launch of its AI product. There is growing bipartisan support to regulate AI, and we expect activity in this space to escalate in the coming months.

### **Debt Ceiling**

Since our last April update, there have been several developments on the ongoing debt ceiling skirmish, especially in the last two weeks. As mentioned above, the House H.R. 2811, the [Limit, Save, Grow Act of 2023](#), which suspends the debt ceiling until March 31, 2024, and enacts a number of Republican policy priorities, including permitting reform, work requirements for social welfare programs, a prohibition on student loan forgiveness by the federal government, re-initiation of repayment requirements for federal student loans, spending caps, rescission of unspent COVID funds, and repeal of certain energy tax provisions, among other provisions. This Republican-passed legislation is viewed as the opening bid from House Republicans and an effort to force a broader negotiation over raising the debt ceiling. On the Administrative front, on May 1, 2023, Treasury Secretary Janet Yellen [sent a letter to Congressional Leaders](#) indicating that the U.S. Government may exhaust all extraordinary measures as soon as June 1, 2023. The Treasury

letter has had the initial effect of galvanizing Senate and House Republicans around the House-passed proposal. The Senate GOP suggested if a clean debt ceiling were put on the floor today, not a single Senate GOP member would vote for it. For now, the Senate GOP is strongly entrenched behind the House's position, but this could change depending on the X-date.

- The President has invited Congressional Leaders to the White House tomorrow (May 9<sup>th</sup>) for a discussion about raising the debt ceiling. Currently, we do not expect a significant breakthrough at this meeting. The President continues to state that raising the debt ceiling is non-negotiable, although he is willing to entertain discussions – separately – around budget, tax, and spending priorities. The Administration has also previously signaled its interest in energy permitting reforms to advance its clean energy agenda and resolve transmission issues.
- Moreover, there is healthy skepticism among all Republicans that the U.S. government will definitively hit the X-date in early June. A significant number of Republican members on both sides of the Capitol believe that there is an equally strong likelihood the Treasury will have enough cash to get to June 15<sup>th</sup>, when corporate tax receipts are due, which will then buy even more time. If the U.S. exhausts its borrowing authority on or about June 1<sup>st</sup>, there are, of course, multiple GOP views on what should be done. Some in the House GOP and Senate GOP conferences believe that aligning the debt ceiling with the broader government funding expiration in September is the appropriate play. However, that viewpoint seems to be waning. The House GOP Leadership is against a delay currently.
- Similarly, House GOP leadership is pushing back on the narrative that there is not enough time for a negotiated outcome. It was suggested to us that the parameters of a deal are not that complex, and the length and detail of the final bill would be nothing compared to an omnibus spending deal or the NDAA. In their view, it's really a matter of getting down to horse trading. Speaker McCarthy (D-CA) clearly wants a deal. In our view, a likely deal may include discretionary spending caps, rescission of unspent COVID funds, permitting reforms to advance energy production and transmission and, potentially, something on student loan repayments.
- The open question remains of what the House and Senate GOP conferences will do if we get closer to the X-date without a negotiated resolution in sight. Some believe that some House GOP moderates will align with the House Democrats around a discharge position. In our view, this appears unlikely, mainly because it is procedurally difficult and time-consuming. A discharge petition is only effective once a majority of the House of Representatives (218 members) signs the petition to discharge the bill from the Committee. However, once 218 signatures are collected, another seven legislative days must pass, at which point the motion to discharge the legislation from the Committee would come to the floor on the second or fourth Monday after those seven legislative days are up.

#### **Silicon Valley Bank Legislative Response**

The turmoil in the banking sector appears to be never-ending, with new concerns arising late last week around PacWest Bancorp and Western Alliance, two regional banks whose stocks are seesawing. The cascading effects from Silicon Valley Bank's collapse have not slowed down yet, and while the ongoing volatility in the banking sector will continue to worry lawmakers, RFA continues to believe that, as of now, there is not a clear legislative fix for Congress to corral around.

- Deposit Insurance Legislation: The [FDIC report](#) on the deposit insurance system, released on May 1<sup>st</sup>, outlined three options for reforming the Deposit Insurance Fund (DIF), all of which would require congressional approval. The three options provided in the report include maintaining the current deposit insurance framework (Limited

Coverage); extending unlimited deposit insurance coverage to all depositors (Unlimited Coverage); and offering different deposit insurance limits across account types, where business accounts receive significantly higher coverage than other account types (Targeted Coverage.) FDIC Chair Gruenberg expressed his support for the Targeted Coverage option in a statement accompanying the report, noting that of the three reform options, the FDIC report identifies Targeted Coverage as having the “greatest potential for meeting the fundamental objectives of deposit insurance relative to its cost.” While these developments are noteworthy, it is unclear whether they will move the needle and persuade members of the House Freedom Caucus to explore changes to the deposit insurance system. Upcoming House Financial Services Committee (HFSC) and Senate Banking Committee (SBC) hearings on the collapse of Silicon Valley Bank (SVB) will likely shed more light on if there is a potential legislative path forward, but as of now, momentum for legislative fixes to the deposit insurance system is waning.

- **Clawback Legislation:** Legislation designed to hold bank executives of failed banks accountable has garnered bipartisan support to a certain degree. There remains a disconnect between Republican and Democratic members on the extent and scope of such legislation, but during a recent SBC hearing, Republicans agreed with Democratic members that it was important to hold bank executives accountable and Ranking Member Scott (R-SC) expressed an openness to exploring clawback legislation, albeit he raised concerns about overly prescriptive legislation deterring talent from entering the banking sector. One bipartisan bill, the Failed Bank Executives Clawback Act, introduced by Sen. Elizabeth Warren (D-MA) and cosponsored by Republican Sens. Josh Hawley (R-MO) and Mike Braun (R-IN) is one of the more likely proposals thus far. The bill would make it easier for the FDIC to claw back bank executives’ compensation in the five-year period preceding a bank failure. Rep. Katie Porter (D-CA) introduced a companion version of the bill with two Republican cosponsors.

**Nominations**

Sen. Menendez’s (D-NJ) campaign to pressure the White House to nominate a Latino to the Federal Reserve Board of Governors looks to have succeeded, as President Biden is expected to announce his intent to nominate U.S. Executive Director at the World Bank Adriana Kugler to serve as a Governor at the Fed. Adriana Kugler grew up in Columbia and was formerly a professor of public policy at Georgetown University prior to serving as the Executive Director at the World Bank. She was nominated to the position by President Biden and was confirmed by the Senate last April by voice vote. She also previously served as the Chief Economist to former DOL Secretary Solis from 2011 to 2013. President Biden also announced his intent to nominate Fed Governor Jefferson to serve as Vice Chair of the Board. Governor Jefferson won accolades and praise from Republicans on the Senate Banking Committee during his last confirmation hearing. He was favorably reported by the Committee in a 24-0 vote last year and was confirmed by the Senate in a 91-7 vote. We expect Governor Jefferson to receive more scrutiny during his next confirmation hearing given the Vice Chair role's importance and the banking sector's ongoing volatility. That said, given that both nominees received widespread support from Senators as little as 13 months ago, we don’t expect these nominations to be extremely partisan. Regarding the vacancy at the Department of Labor, Julie Su continues to face scrutiny and opposition from small business groups and rideshare companies like Uber, Lyft, and DoorDash. While we expect the Senate to vote on her nomination this month, the math is not trending in her direction given Sen. Manchin’s recent criticism of the former California Secretary of Labor. It is also unlikely that Su receives any support from Republicans, and with Sen. Feinstein’s ongoing absence from Congress, Su’s nomination is in question.

**SENATE BANKING & HOUSE**

**House Financial Services Committee**

The House Financial Services Committee has a busy three weeks on tap, where the primary focus will be oversight of the recent bank failures and the subsequent regulatory responses. They’ll kick

<p><b>FINANCIAL SERVICES COMMITTEE</b></p>	<p>off activity this week with two subcommittee hearings – the Financial Institutions subcommittee will have a hearing focused on policy recommendations with legal witnesses, and the Oversight subcommittee will have a hearing on GAO’s report on the supervisory failures and the resolution process. In addition, next week the committee will hear from the prudential regulators (Fed, FDIC, OCC, NCUA) where we expect the hearing will be almost exclusively focused on the recent failures. Also, next week, the Committee will hold a hearing with the former CEO of Silicon Valley Bank, Gregory Becker, and Signature Bank President Eric Howell and Chairman Scott Shay. New York Department of Financial Services Superintendent Harris and California Department of Financial Protection and Innovation Commissioner Hewlett will also appear at the hearing. The Committee will also continue its focus on digital assets – with two hearings planned on the topic. They’ll begin with a joint hearing on Wednesday (May 10<sup>th</sup>) with the Agriculture Committee where we expect legislation to address gaps between the SEC and CFTC to be discussed, and they’ll hold an additional subcommittee hearing expected to be focused on stablecoin legislation. The Committee will also hold hearings on the FHFA’s loan level pricing agreement (LLPA) changes. They will end the month with a mark-up focused on legislation regarding capital formation and regulatory response to bank failures. The current tentative schedule is below:</p> <ul style="list-style-type: none"> <li>• May 10<sup>th</sup>: Joint Digital Assets subcommittee hearing with Agriculture Commodity Markets subcommittee</li> <li>• May 10<sup>th</sup>: Financial Institutions subcommittee hearing on the federal regulatory responses to recent bank failures</li> <li>• May 11<sup>th</sup>: Oversight subcommittee hearing with GAO on the federal regulatory responses to recent bank failures</li> <li>• May 16<sup>th</sup>: Full Committee hearing with prudential regulators</li> <li>• May 17<sup>th</sup>: Joint Financial Institutions &amp; Oversight subcommittee hearing with former CEO SVB &amp; Signature Bank executives and CA &amp; NY regulators</li> <li>• May 17<sup>th</sup>: Housing subcommittee hearing on FHFA LLPA</li> <li>• May 18<sup>th</sup>: Digital Assets subcommittee hearing</li> <li>• May 23<sup>rd</sup>: Full Committee hearing on FHFA LLPA proposal</li> <li>• May 24<sup>th</sup>: Full Committee markup</li> </ul> <p><b>Senate Banking Committee</b></p> <p>The recent banking failures will also be the primary focus of the Senate Banking Committee this work period. Like the House, they will hold hearings with the former CEO of SVB and Chairman and President of Signature Bank. They will also hear from the prudential regulators, and NY and CA banking regulators. In addition, the Committee will hold a hearing on the SAFE Banking Act. Chairman Brown continues to say that moving SAFE Banking through the Banking Committee by regular order is a top priority for him. The current tentative schedule is below:</p> <ul style="list-style-type: none"> <li>• May 11<sup>th</sup>: Executive Session to process the nominations of <b>Dr. Jared Bernstein</b>, to be Chairman of the Council of Economic Advisers; <b>Dr. Ron Borzekowski</b>, to be Director of Financial Research, Department of the Treasury; <b>Mr. Solomon Jeffrey Greene</b>, to be an Assistant Secretary of Housing and Urban Development, and <b>Mr. David Uejio</b>, to be Assistant Secretary of Housing and Urban Development.</li> <li>• May 11<sup>th</sup>: Hearing on the SAFE Banking Act</li> <li>• May 16<sup>th</sup>: Hearing with the former CEO of SVB and former Chairman and President of Signature Bank</li> <li>• May 18<sup>th</sup>: Hearing with prudential regulators, and NY and CA banking regulators</li> </ul>
<p><b>SENATE FINANCE AND WAYS AND MEANS COMMITTEE</b></p>	<p><b>Ways and Means Committee</b></p> <p>The debt limit will determine a lot of the committee activity at Ways &amp; Means over the next two weeks. Tomorrow (May 9<sup>th</sup>), the Committee travels to Staten Island, New York for a field hearing on supply chains and the American worker. The field hearings held earlier this year have all been building towards an economic package of expired tax provisions that have bipartisan support.</p>



	<p>The package is likely to include restoring R&amp;D expensing in place of Section 174 R&amp;D 5-year amortization requirement, the prior-law calculation for the 163(j)-interest deduction limitation and extending the 199A deduction beyond 2025. A markup of this package is likely in the month of May, but the prospect of future legislative action on this remains unlikely, as it will not garner bipartisan support in the Senate.</p> <p><b>Finance Committee</b></p> <p>The Senate Finance Committee has calendared a hearing on Thursday (May 11<sup>th</sup>) to discuss international tax and the pharmaceutical industry. Chairman Wyden (D-OR) has been investigating the tax practices of pharmaceutical companies for over a year, so this hearing comes as no surprise. The witnesses are also academic and not corporate. We expect Chair Wyden to hold similar hearings in the future that center around the themes of his investigations: pharmaceuticals, tax practices of high-net worth individuals, etc.</p>
<b>ADMIN AND REGULATORY</b>	<p><b>Administration Overview</b></p> <p>In recent months, Congress has moved on measures that have led President Biden to utilize the veto. His first veto came in late March when he blocked a Labor Department rule that allowed retirement plan managers to consider ESG aspects of investment decisions. Biden issued his second veto in mid-April after Congress passed a measure revising his Administration's definition of "Waters of the United States" under the Clean Water Act. We expect President Biden to potentially issue his third veto as the Senate voted to undo his emergency declaration temporarily removing tariffs on solar energy imports from Southeast Asian countries.</p> <ul style="list-style-type: none"> <li>• In terms of staffing, President Biden announced on Friday that Neera Tanden will serve as the next head of his Domestic Policy Council. Tanden will replace Susan Rice, who plans to leave the administration later this month. Following the failure of her initial nomination as director of the Office of Management and Budget in the Senate, Tanden has served as senior adviser and staff secretary at the White House.</li> <li>• Thousands of student-loan borrowers could be affected by the Supreme Court's decision by the end of next month. On February 28, the nation's highest court heard oral arguments in two cases, halting the implementation of President Biden's plan to cancel up to \$20,000 in student debt for federal students earning less than \$125,000 a year. In November, the relief was suspended due to lawsuits. As of right now, it is unknown how the Supreme Court will rule on the legality of the Administration's debt relief plan.</li> <li>• The Biden administration has not released a formal China strategy, but recent speeches by Treasury Secretary Janet Yellen and National Security Advisor Jake Sullivan have shed light on how the White House is tailoring its economic agenda to China. Both Yellen's and Sullivan's recent remarks indicate that the Administration does not intend to decouple U.S.-China trade ties, nor does it wish to escalate economic competition into a greater conflict. For its national security interests, however, the United States will continue to use its toolbox, particularly export controls, against China. The two officials also conveyed that the U.S. approach towards China will include extensive, collaborative efforts with key allies. Additionally, it is likely the dovish messaging by Yellen and Sullivan is intended to reassure these partners who share similar concerns over China's malign national security actions but are concerned that a radical shift in Western economic relations with China may be necessary. Additionally, Majority Leader Schumer and Senate Democrats are renewing an effort to pass legislation that addresses competition with China on issues ranging from technology flows to China to making it more challenging for U.S. capital to go to Chinese companies. The effort has been dubbed the "China Competition 2.0" bill and would expand on the legislative work from the 117<sup>th</sup> Congress on the Chips and Science Act.</li> <li>• We also still anticipate the White House to issue an Executive Order (EO) on outbound investment in the coming weeks and potentially this month.</li> </ul>

- Guidance from Treasury/IRS related to crypto reporting under 6045 is still pending release from OIRA earlier this year.
- Further guidance related to the Corporate Alternative Minimum Tax (CAMT) and the stock buyback excise tax is expected this year, following sub-regulatory notices from the end of 2022.

### **Prudential Regulators**

On April 28<sup>th</sup>, the Federal Reserve released its [report](#) on the supervision and regulation of SVB, led by Vice Chair for Supervision Michael Barr. The report discusses the Economic Growth, Regulatory Relief, and Consumer Protection Act, colloquially known as S. 2155, and places some blame on the legislation for leading to changes in regulation and supervision toward financial institutions at the Fed. That said, the report does not call on Congress to enact new legislation. Instead, the report provides reform recommendations for the regulatory and supervisory regime for banks. You can read [RFA's analysis of the Federal Reserve's recent report here](#). Additionally, the FDIC released a report on May 1<sup>st</sup> outlining legislative recommendations for Congress to examine to amend the deposit insurance system, as well as a report released on April 28<sup>th</sup> highlighting supervisory lapses regarding Signature Bank. The FDIC report mostly blamed Signature's collapse on poor management, poor corporate governance, and a failure to understand the risks associated with crypto industry deposits. [You can read RFA's analysis of the FDIC's recent report on Signature Bank here](#). Given the volatility in the banking sector and in the stocks of regional banks like PacWest, we expect the Federal Reserve and FDIC to remain vigilant and engaged moving forward.

### **Consumer Financial Protection Bureau**

The Bureau continues to show it can make progress on Director Chopra's priorities while simultaneously dealing with issues affecting the banking and financial markets. At the end of April, the Bureau issued an interim final rule updating the Facilitating the LIBOR Transition final rule. As a reminder, LIBOR is set to expire June 30, 2023, so any products still relying on LIBOR must be transitioned by then. Also on the horizon is a July 26, 2023, comment deadline for a proposed rule adding ability to repay requirements to Property Assessed Clean Energy (PACE) loans.

- On the payments front, Director Chopra continues to raise concerns about legal protections for funds flowing through nonbank payment systems like Venmo and of technology companies using their scale to crowd out new entrants. In a recent Washington Post interview, Chopra said it would be a "big mistake for the U.S. to copy China's financial system" since they are "dominated by companies like WeChat Pay and Alipay." Director Chopra has been angling to bring nonbank providers of financial services under his purview, even sending data requests to a diverse set of companies, but to date we have not seen the Bureau move to formally regulate these companies through a larger participant, or other rule.
- Director Chopra has also used his dual hat as Director of the CFPB and a Board Member of the FDIC to comment publicly on the ongoing banking crisis. Chopra believes banking institutions over \$100 billion in assets need more stringent supervision, that the deposit insurance framework should be revisited, and that regulators need to review their legal authorities regarding clawing back executive compensation.

### **Securities and Exchange Commission (SEC)**

The SEC finalized two rules on May 3<sup>rd</sup>: (1) a rule updating Form PF for hedge funds and private equity funds, and (2) a rule requiring public companies to provide more granular disclosures about stock buybacks. The SEC also reopened the comment period for the proposed rule modernizing beneficial ownership reporting, after the Division of Economic and Risk Analysis (DERA) released an analysis reviewing new data that was provided by commenters. The fact that DERA felt the need to publicly release its analysis of the commenters' data and reopen the

comment period to solicit additional feedback on its analysis suggests that the SEC anticipates litigation over the final rule.

May will likely be a busy month for the SEC's rulemaking agenda. Several rules could be finalized this month, including the private fund advisers' rule, the money market fund reform rule, and the cybersecurity rule for public companies. In addition, we continue to expect rules relating to securities held of record and human capital management disclosure to be proposed soon.

**Financial Stability Oversight Council**

The Financial Stability Oversight Council (FSOC) issued in April its long-awaited proposed guidance on nonbank designations, and a new proposed analytical framework. FSOC will be taking comments on the proposed guidance until mid-June. We expect a several-month implementation period after the comment period closes. Treasury Secretary Yellen, who chairs the FSOC, is likely to testify in both the House Financial Services Committee and Senate Banking Committee in June. We anticipate she will be pressed on the substance and procedural aspects of the guidance. FSOC's next meeting isn't expected until late June or July. [You can read RFA's analysis of the FSOC's proposed guidance on nonbank designations here.](#)