**Nimble Supervisory Environment – Tabletop 7**

**Background**
Several banking agencies recently started to adopt and incorporate several policies designed to foster adequate supervision and regulation of new products and services that don’t fit neatly into existing regulatory frameworks. Given different names (sandboxes, pilot programs, no action letters, etc), agencies are hopeful that these policies will promote responsible innovation.

**Discussion Questions**

1. For banks/fintechs, have you participated or thought about participating in these programs?
2. How do these programs help agencies supervise new technology, products or services?
3. Where do these programs fall short in appropriately supervising new technology, services or products?
4. What benefits do these programs present? What risks?
5. How can these programs be integrated into the traditional rulemaking and supervisory process?
6. How can the traditional rulemaking and supervisory process increase the timeliness of reaction to industry development?
7. Do you agree with the CRS report discussing sandboxes or greenhouses?
   a. Do such programs foster communication between fintech firms and regulators?
8. Do you view sandboxes as a way for fintechs to operate under one set of rules nationally (rather than different rules in each state)?
9. Would sandboxes unfairly preempt state consumer protection rules?
   a. Are there ways to protect against this?
10. What are the benefits of policymakers choosing to tailor regulation for fintechs could apply a different regulatory treatment either to companies or to products?
11. Does regulatory tailoring and exemptions for fintech firms would put incumbents at a competitive disadvantage.
12. Are there some regulations or category of regulations that could benefit from sandboxes or participation in one of the innovation programs/policies?
13. What are some use-cases of these sandboxes, trial programs, no-action letters, pilot projects, etc?
   a. What ideas do you have that could benefit from these innovation programs?
14. What are your thoughts on NCLC’s assertion that the CFPB’s sandbox would help companies evade consumer protection laws?
15. Do credit models or products implemented through a sandbox raise a higher?
Reading Material

- “Building the right sandbox to attract fintechs,” Jackson Mueller, BankThink in American Banker, Nov. 13, 2019
- “Crypto startups don’t need sandboxes, they need greenhouses,” John Collins, July 2, 2018, Coindesk blog.