



Ms. Nanette D. Lawson
Interim Chief Executive Officer and Chief Financial Officer and Treasurer
Municipal Securities Rulemaking Board
1300 I Street NW
Washington, DC 20005

May 6, 2020

Re: COVID-19 Credit-Related Material Event Notices

Dear Ms. Lawson:

The National Federation of Municipal Analysts (NFMA) is a not-for-profit association with nearly 1,300 members in the United States and is primarily a volunteer-run organization. Membership is diverse and consists of individuals who work for mutual funds, trust banks, wealth management companies, rating agencies, credit providers, independent research groups and broker-dealer firms. The NFMA's goals are to promote professionalism in municipal credit analysis, to conduct educational programs for members and other interested parties, to promote better disclosure by issuers and to advocate for good practices in the municipal marketplace. The NFMA seeks to educate its members, and by extension, the public at large, about municipal bonds. Annual conferences are open to anyone wishing to attend and our *Recommended Best Practices in Disclosure* and *White Papers* are available on our website, www.nfma.org.

The NFMA respectfully requests that the Municipal Securities Rulemaking Board (MSRB) develop a process and structure to assist issuers and investors in filing and retrieving critical COVID-19 credit-related information. The MSRB's current laissez-faire approach to these filings is both a missed opportunity to provide leadership and order to disclosure filings during the most significant credit event in memory and risks that critical credit information provided by issuers is not readily accessible by investors.

A MSRB representative recently suggested in a news article that issuers have flexibility on how to file COVID-19 filings because they are not an enumerated event under Rule 15c2-12. The representative added that the organization is publishing a summary of COVID-19 filings with the hopes that perhaps a more consistent approach would develop organically.

The NFMA believes that the MSRB's approach of allowing tens of thousands of issuers to independently decide how, when, and where to file these disclosures on EMMA demonstrates an underappreciation for investors' long-standing concerns regarding the ability to effectively utilize the reporting system.

According to the MSRB's website, nearly 2,100 COVID-19 related continuing disclosure notices have been submitted through April 26, 2020, across more than 20 different categories. A high



percentage of these filings have been logged in the non-descript “other” categories that house information ranging from a notice of an upcoming bondholder call to a payment default. Unfortunately, the list created by the MSRB to help identify COVID-19 disclosures is lacking as well. It seems to contain any filing that refers to the virus, whether it is credit-related information prepared by the obligor or simply a notice of a rating change, bond call, or a delay in filing financials. And the information on the list is categorized by issuer, not obligor or CUSIP, meaning that the list does not provide a way to easily identify the credit/issue related to the filing and each must be opened and read.

To help remedy the current disorganized process, the MSRB should immediately create a separate category for credit-related COVID-19 disclosures, publish guidance, with examples, of how and where to file certain disclosures, and use its education platform and other outreach efforts to ensure that issuers and obligors have guidance on how to effectively communicate with investors using EMMA.

Thank you for your consideration of our suggestions to improve COVID-19 disclosures on the EMMA system during these unprecedented times. We would be happy to discuss our recommendations further at your convenience.

Sincerely,

/s/ Lisa Washburn

Lisa Washburn
NFMA Industry & Media Liaison

