

**From:** [Shaun Harms](#)  
**To:** [Budget Comments](#)  
**Subject:** Compliance NCUA  
**Date:** Wednesday, November 13, 2019 9:44:57 PM

---

NCUA Budget Committee,

I wanted to comment on the proposed budget and compliance side of the NCUA. The Dodd Frank Act that was passed by Congress was partly designed to strengthen the consumer protection in the financial services industry. Banks and Credit Unions have been dealing with this since the passage of the Act and the onslaught of rules in 2014. There is one major problem, all of the regulators have stepped up their compliance reviews with the exception of the NCUA. Its not even on the same playing field. I represent over 85 banks in six states and all of them have committed resources to outside audits, personnel, systems, etc. to help them be compliant with the rules and be ready for the enhanced examinations. You just don't see this with credit unions. I have seen advertisements and TRID disclosures that have been issued from credit unions that are so non-compliant with rules, but there are no mechanisms to check this or checks in exams. Who gets hurt by an advertisement without all of the disclosures and ensuring it is clear? What about inaccurate or unclear TRID disclosures? **The consumer! The one that the Dodd Frank Act set out to protect.** This to me is so unfair and credit unions stand tall saying they concentrate on members/consumers, but yet there are no controls to protect them? Seems backwards to me an always has.

I have talked to several credit unions between \$250M and \$1.5B and they don't even really have a competent person that knows the rules. How does this protect the consumer and ensure they are following what is outlined by regulation? I have also talked to credit unions about helping them with their programs, and they don't want to contribute the resources. Once said the NCUA doesn't even look at most of the areas you are proposing that are risk areas, so we don't want to do anything in that area. But yet banks as spending thousands of dollars a year on personnel, systems, software, audits, consulting, etc. I have always been shocked at the lack of compliance in credit unions that I have seen around my area personally. I was so happy to see the NCUA realized that they were behind in this area and put out a memo, now I just hope you follow through. Not only to make the playing field more level, but to take care of your biggest asset, the customer.

**Shaun M. Harms – CRCM, CCBCO, CBAP**  
**Executive Director**  
**Bankers Assurance, LLC**  
**(501) 410-3198**  
**[www.bankersassurance.net](http://www.bankersassurance.net)**



**Confidentiality Disclosure Notice:** The information contained in this e-mail is legally privileged and confidential information for the sole use of the intended recipient. Any use, distribution, transmittal or re-transmittal of information contained in this email by persons who are not intended recipients

may be a violation of law and is strictly prohibited. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender at the number above and delete all copies.

This email does not constitute an unsolicited advertisement of services. To request that future correspondence is not sent to you please contact us at [info@bankersassurance.net](mailto:info@bankersassurance.net) or PO Box 6039, Sherwood, AR 72124.