

From: [Medina, Alysse](#)
To: [Budget Comments](#)
Subject: Comment- Dedicated Consumer Compliance Exam Program
Date: Monday, December 2, 2019 5:52:00 AM

Good morning and to whom it may concern:

Please consider the following comment in response to Mr. Harper's proposal to create a dedicated consumer compliance exam program for large, complex credit unions. TruWest Credit Union is generally against the proposal of an additional and dedicated exam. TruWest Credit Union joins by reference and incorporation the comments provided by the Credit Union National Association (CUNA), specifically at "Expanded Office of Consumer Financial Protection" at page 4 to CUNA Oral Comments- NCUA Budget Briefing, Dated November 20, 2019. As referenced and demonstrated by the agency's current approach, the agency has the tools in place to further evaluate a credit union's consumer compliance program when a need is identified through the current risk-focused examination process. If additional resources are available, they may be better used creating an examiner specialization wherein during the existing exam, examiners are better able to conduct a more in depth review of a consumer compliance program when an institution exhibits a need. This would prevent a blanket requirement that may waste resources at institutions (both by the agency and the institution) when sound programs are in place. Thank you.

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