



3138 10th Street North
Arlington, VA 22201-2149
703.842.2215 | 800.336.4644
f: 703.522.2734
dberger@nafcu.org | nafcu.org

B. Dan Berger
President & Chief Executive Officer

National Association of Federally-Insured Credit Unions

May 17, 2017

The Honorable Richard Cordray
Director
Consumer Financial Protection Bureau
1700 G Street NW
Washington, D.C. 20552

Re: Request for a Delay of HMDA Final Rule Implementation

Dear Director Cordray:

On behalf of the National Association of Federally-Insured Credit Unions (NAFCU), the only national trade association focusing exclusively on federal issues affecting the nation's federally-insured credit unions, I am writing to respectfully request for the Consumer Financial Protection Bureau (CFPB or Bureau) to delay the current effective date of the *Home Mortgage Disclosure Act* (HMDA) Final Rule. Specifically, NAFCU recommends the Bureau approve a one-year delay of the rule's effective date to January 1, 2019.

As not-for-profit, member-owned financial institutions, credit unions have a proven track-record of affordable and responsible lending in their communities. NAFCU and our members support the intended purpose of HMDA, which is the promotion of fair lending and ensuring equitable access to credit in the housing market. However, both before and after the publication of the Final Rule, we expressed multiple concerns regarding the Bureau's aggressive expansion of Regulation C beyond what was required by the *Dodd-Frank Act*. As it stands now, this rulemaking has and will likely continue to play a substantial role in increasing the overwhelming costs of regulatory compliance – taxing credit unions' finite resources.

The Bureau's pending proposal to "fix" various issues within the HMDA Final Rule is a step in the right direction. Credit unions appreciate measures taken by regulators intended to correct errors and offer additional clarifications. We fully intend to comment on that proposal in a separate letter. That being said, no amount of 11th hour tinkering with technical amendments can offset the tremendous burden being hoisted upon credit unions and their vendors as a result of the Final Rule.

NAFCU and our members strongly believe an extension of the effective date would go a long way towards mitigating the burdens of this complex rulemaking and ensure that financial institutions and their vendors have sufficient time to prepare to implement this rule. As we

Consumer Financial Protection Bureau

May 17, 2017

Page 2 of 2

continue to inch toward the fixed effective date, NAFCU has heard increasing levels of concern from credit unions and their vendors over preparations for the Final Rule. In order to facilitate a smooth transition to the new HMDA requirements, it is critical that credit unions and their vendors are provided enough time to ensure they are adequately prepared before the ultimate effective date. Therefore, NAFCU and our member credit unions strongly recommend the Bureau delay the effective date for the HMDA Final Rule for one-year.

Given the importance of this issue, NAFCU requests the opportunity to meet with you as your schedule permits to discuss credit unions' efforts to come into compliance with HMDA and the need for a further delay. We look forward to meeting with you in the near future as your schedule permits. If you have any questions or need additional information, please feel free to contact me, or Alexander Monterrubio, NAFCU's Director of Regulatory Affairs at (703) 842-2244 or amonterrubio@nafcu.org.

Sincerely,



B. Dan Berger
President & CEO