



Jim Nussle
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March 18, 2020

Chairman Russell Golden
Financial Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856

Re: Delay of CECL in Light of COVID-19

Dear Chairman Golden:

On behalf of America's credit unions, I am writing to request delay of the effective date of the Financial Accounting Standards Board's (FASB) accounting standards update on credit losses. The Credit Union National Association (CUNA) represents America's credit unions and their 115 million members.

We anticipate the challenges facing credit unions and their members will get worse before they get better, as it is clear we are in the early stages of this pandemic. Credit unions are open for business and serving their members. Their top priority right now is keeping their members, volunteers and employees safe and healthy, and remaining in a position to serve members and the community during and after the crisis.

At this time, it is critical that credit unions be able to focus on serving their members, who are facing mounting financial pressures due to COVID-19. Therefore, we urge the FASB to begin the process to delay the effective date of the current expected credit losses (CECL) standard as it applies to credit unions until at least January 2024.

We appreciate the FASB's decision in October 2019 to move the effective date until January 2023. At the time the FASB proposed moving the date, we supported 2023 as an appropriate timeframe for credit unions. However, in light of the current crisis, we urge the FASB to provide additional time for compliance. While some credit unions are in the final stages of preparation, the vast majority are in the very early stages of gathering necessary data and beginning to make the numerous changes required under CECL. A one-year delay will help ensure our nation's credit unions—the median of which is well under \$100 million in assets—are prepared to comply.

On behalf of America's credit unions and their 115 million members, thank you for considering delaying the effective date of CECL as it applies to credit unions until at least January 2024. If you have questions about our comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Jim Nussle".

Jim Nussle
President & CEO