



MISSOURI CREDIT UNION ASSOCIATION

August 25, 2014

Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

RE: Don Cohenour – 12 CFR Parts 701 and 722, RIN 3133-AE36
Appraisals-Availability to Applicants and Requirements for Transactions Involving an Existing Extension of Credit

Dear Mr. Poliquin:

On behalf of the 1.3 million credit union members, the Missouri Credit Union Association (MCUA) would like to take this opportunity to express our views on possible amendments to the proposed rule of the National Credit Union Administration (NCUA) Board on appraisal requirements.

MCUA generally supports the proposed rule on appraisal requirements to reduce regulatory burdens for credit unions and to make certain technical changes. We support the proposed change to eliminate the agency's requirement that federal credit unions provide a copy of an appraisal used in connection with a member's application for any loan secured by a first lien on a dwelling when requested by a member/applicant. NCUA's current rule overlaps with requirements in Regulation B, Equal Credit Opportunity Act, implemented by the Consumer Financial Protection Bureau (CFPB).

Under NCUA's proposal, the agency's appraisal requirements would only apply to loans secured by a subordinate lien and a copy of the appraisal used in connection with the application would be supplied to the member/applicant just when requested by the member. Federal credit unions would still be subject to the CFPB's requirement under Regulation B that creditors must provide applicants with free copies of appraisals and other written evaluations in connection with an application for a loan secured by a first lien, regardless of whether the applicant requests a copy of the appraisal.

NCUA's proposal would exempt transactions that involve an existing extension of credit at the lending credit union as long as there is no advance of new monies, except to cover closing costs, or there has been no material change in market conditions that would threaten the credit union's real estate collateral. This proposed change would make NCUA's appraisal rule more consistent with the federal bank regulators' approach.

ST. LOUIS

2055 Craigshire Road, Suite 200
St. Louis, Missouri 63146-4009

KANSAS CITY

1828 Swift Avenue, Suite 100
North Kansas City, Missouri 64116-3629

JEFFERSON CITY

223 Madison Street
Jefferson City, Missouri 65101-3202

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However, we request that NCUA's final rule clarify that the "written estimate of market value" required for exempt transactions be satisfied by an estimated market value based on an automated valuation model (AVM). This change would be consistent with the 2010 Federal Financial Institutions Examination Council's (FFIEC's) interagency appraisal and evaluation guidelines.

The proposed rule would make technical amendments to the definition of "application" to align NCUA's definition with the CFPB's definition under Regulation B. We believe these technical changes would be helpful to credit unions as they would no longer have to be concerned with two different regulations and promote consistency between the two regulations.

As always, we appreciate the opportunity to respond to this proposed rule. We will be happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Don Cohenour". The signature is written in a cursive style with a large initial "D" and "C".

Don Cohenour
President

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