

July 5, 2016

Judith Dupre, Executive Secretary
Federal Financial Institutions Examination Council
L. William Seidman Center, Mailstop: 7081a
3501 Fairfax Drive
Arlington, VA 22226-3550

**Re: FFIEC Proposal to Revise the Uniform Interagency Consumer Compliance Rating System -
Docket Number FFIEC-2016-0001**

Dear Ms. Dupre:

On behalf of the 1.453 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Federal Financial Institutions Examination Council's (FFIEC) proposal to revise the Uniform Interagency Consumer Compliance Rating System.

HCUA appreciates that the FFIEC is revising the Consumer Compliance Rating System (CC Rating System), to reflect the regulatory, examination, technological, and market changes that have occurred since the initial establishment of the current rating system. HCUA supports the shift to a risk-based, tailored-examination focus as opposed to the current focus on transaction testing.

We greatly appreciate the rulemaking's premise that the CC Rating System [was] not developed to set new or higher supervisory expectations for financial institutions and their adoption will represent no additional regulatory burden. We lament that any change in a standard must certainly create some sort of regulatory burden therefore, and thus, we urge the agencies (for credit unions, the CFPB and NCUA), to follow this statement with fervor. If indeed these changes properly implement a risk-based tailored-examination focus, they should ideally result in a lessened regulatory burden on credit unions.

Finally, we support the NCUA's representation in the proposal that the principles and standards of the CC Rating System will be integrated into the existing CAMEL rating structure, in place of a separate rating. HCUA believes the integration into the Management component is an appropriate place to assess an institution's compliance risk, as opposed to having a stand-alone rating.

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

Sincerely,



Brad Douglas
President/CEO