



March 27, 2015

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

Re: Comments on Proposed Rule—Capital Planning and Stress Testing—Schedule Shift

Dear Mr. Poliquin:

On behalf of the 1.3 million credit union members, the Missouri Credit Union Association (MCUA) appreciates the opportunity to comment regarding the National Credit Union Administration (NCUA) Board's request for comments on the capital planning and stress testing schedule shift.

This proposed rule would shift the timeline for credit unions that are subject to NCUA's stress testing rule by changing the required action dates in the stress testing regulation. NCUA is proposing to reduce the time between the "as-of-date" and the capital plan due date from five months to four months. We understand that NCUA is changing these dates to conform to those used by the banking agencies, which were recently updated in a final rule. However, we urge NCUA to maintain the current five months from as-of-date to capital plan due date in a final schedule shift rule.

This schedule shift would result in approximately 20% less time for credit unions to perform tasks between the "as-of-date" and the capital plan due date than under the current schedule. This proposed rule would not provide credit unions sufficient time to complete required capital plans. Furthermore, credit unions have only two months to review the Federal Reserve Board's stress test scenarios instead of the three months in the current rule. This compressed timeframe is even more burdensome because changing the "as-of-date" to year's-end places additional burdens on credit unions subject to the rule due to additional tasks required at the close of the year.

Saint Louis 2055 Craigshire Road, Suite 200, Saint Louis, MO 63146-4012
Kansas City 1828 Swift Avenue, Suite 100, North Kansas City, MO 64116-3629
Jefferson City 223 Madison Street, Jefferson City, MO 65101-3202

1.800.392.3074 | www.mcua.org



NCUA should also reevaluate the nine quarter planning horizon requirement. A year-end “as-of-date” aligns with completing the process in a calendar year and supports two calendar years. With the proposed schedule shift, stress testing will be aligned with the calendar year making the ninth quarter unnecessary for the capital adequacy plan to cover two calendar years. For this reason we believe that the forecast horizon should be changed to eight quarters. As always, we appreciate the opportunity to respond to this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink that reads 'Don Cohenour'.

Don Cohenour
President