



November 25, 2020

Ann E. Misback, Secretary  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue NW  
Washington, DC 20551

Re: Threshold for the Requirement to Collect, Retain and Transmit Information for International Funds Transfers and Clarification of Treatment of Convertible Virtual Currencies and Digital Assets With Legal Tender Status; Docket No. FINCEN-2020-0002; RIN 1506- AB41

Dear Secretary Misback:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on FinCEN's joint notice of proposed rulemaking (JNPRM) Docket Number FINCEN-2020-0002. The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.6 million consumers.

The ICUL supports FinCEN's effort to detect and prosecute money laundering; however, we oppose the proposed reduction in the funds transfer and transmittal recordkeeping threshold. We believe that that lowering the threshold from \$3,000 to \$250 increases regulatory scrutiny and presents challenges for credit unions that have smaller staff sizes that already have a diverse range of responsibilities. This is consistent with our previous stance on BSA regulatory expectations, which aims to strike the right balance between compliance and operations. The \$250 threshold creates added workload that we believe will not be commensurate with the added benefits for tracking illicit activities.

Credit unions engage in sound business practices that have the goal of assisting their members while avoiding unnecessary risks. Under the anti-money laundering, suspicious activity reporting and the customer due diligence requirements, credit unions have processes in place to ask for the purpose of the transaction and other information when the situation warrants. In addition, many credit union examiners currently have expectations that each transfer over \$3,000 should be reviewed. The lower threshold will create a dramatic increase in work, because in many situations this is completed manually.

We appreciate the opportunity to comment on the JNPRM and we ask FinCEN to explore ways to improve BSA regulations in a manner that benefits law enforcement and credit unions. If you have any questions about our letter, please do not hesitate to give me a call at (317) 594-5320.

Sincerely,

John McKenzie  
President, Indiana Credit Union League