



September 9, 2019

Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update – Financial Instruments – Credit Losses (Topic 326) File Reference No. 2019-750

To Whom It May Concern:

On behalf of CASE Credit Union, I am writing regarding the current expected credit loss (CECL) standard and the delay of its effective date. CASE Credit Union serves nearly 45,000 members throughout the lower peninsula of the State of Michigan, with total assets of \$299 million. Additionally, CASE Credit Union is a Community Development Credit Union with a large focus on developing the under-banked population in the areas in which we serve. As you are aware, CECL has the potential to reduce earnings and regulatory capital, which impacts our ability to serve our membership as we traditionally have.

Since publishing the credit loss standards in 2016, financial institutions have provided feedback to the agency regarding CECL implementation and compliance. Last year, FASB extended the effective date and we have begun to prepare for CECL through ongoing educational sessions with our Board of Directors, Management Team and CECL Committee and have begun maneuvering through the many challenges, such as extracting loan data from core processors, revamping accounting methods, determining the appropriate model, and modifying internal controls and reporting systems. It is our opinion that FASB should provide the maximum amount of time for credit unions to prepare for CECL, which is why CASE Credit Union supports delaying the effective date for all other public business entities, including credit unions, until January 2023. This allows us time to learn from larger financial institutions who have the ability to dedicate more resources to this.

We also believe there is merit in the effective date philosophy being proposed by FASB for future accounting standard setting projects, as well the adoption of Credit Losses, Hedging and Leases.



Thank you for the opportunity to comment on the proposed accounting standards update.

Sincerely,

*Bryanna Benoit*

Bryanna B. Benoit, MBA  
Vice President of Finance / Chief Financial Officer  
CASE Credit Union  
Lansing, Michigan