

**DYNAMIC FEDERAL CREDIT UNION**900 E WAYNE ST.
CELINA, OH 45822Phone/Fax 419-586-5522
diane@dynamicfederalcu.com

September 16, 2019

Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116Re: Proposed Accounting Standards Update-Financial Instruments-Credit Losses (Topic 326)
File Reference No. 2019-750

To Whom It May Concern:

Dynamic Federal Credit Union appreciates the opportunity to submit feedback to the Financial Accounting Standards Board (FASB) regarding the current expected credit loss (CECL) standard and the delay of its effective date. I have been the CEO of Dynamic Federal Credit Union for 23 years and the credit union is approaching \$47 million in asset size with 5600 members serving members who work, live, worship or attend school in Mercer County Ohio.

Historically, financial institutions' accounting methods recognized losses based on actual defaults or specific events that anticipated a loss. Representing a significant shift, in 2016, FASB issued new accounting standards, which included CECL. CECL accounting is premised on both historical and current loss *and* loss that is *expected to occur in the future* over the entire lifetime of a loan.

Since FASB issued CECL, stakeholders and interested parties, like Dynamic Federal Credit Union, have submitted feedback to the agency regarding challenges with CECL implementation and compliance. Last year, FASB extended the effective date from January 2020. Since then, entities have continued to prepare for CECL implementation despite experiencing challenges, such as extracting data from core processors, overhauling accounting methods, determining the appropriate model, and adjusting internal controls and reporting systems.

CECL is a major undertaking. The effort involves changes to current assumptions and the adoption of new processes to implement the mythology. Also, it involves reliance on third-party vendors which adds a layer of complexity and requires additional due diligence of such vendors as well as ensuring the proper operation of an outsourced solution. Regulatory compliance continues to be very demanding and the extension of the transition time period will enhance efforts for smaller to mid-size credit unions to implement CECL.

As such, it is necessary that FASB afford the maximum amount of time for credit unions to prepare for CECL, which is why Dynamic Federal Credit Union supports delaying the effective date for all other public business entities, including credit unions, until January 2023. Additionally, our comment in full support of the delay in no way represents concurrence with the notion that the new CECL standard is necessary and beneficial (we do not agree that it is) or that it should apply to financial cooperatives (we do not agree that it should).

While we appreciate FASB engaging with credit unions and laud the Board's proposal to ensure all other public business entities receive enough time to prepare for CECL, we urge FASB to continue engaging with the financial services industry, especially credit unions and other community institutions which face challenges in preparing for CECL implementation.

We appreciate the Board's commitment to engage with interested parties, especially those impacted by the new standard. Thank for you the opportunity to respond to this proposed accounting standards update.

Respectfully,


Diane M. Rodriguez, CEO
Dynamic Federal Credit Union