



Cooperative Credit Union Association, Inc. 2023 Delaware Congressional Talking Points

As the 118th Congress proceeds, a new leadership brings new opportunities for regulatory and legislative change. The following issues are intended to guide member dialogue now with Capitol Hill with some specific legislation included as Congress begins to file bills.

Oppose: Efforts to Eliminate or Reduce Interchange Fees

- Interchange costs cover the cost of fraud detection, credit monitoring, and purchase protection
- Eliminating or reducing these fees, which many consumers agree to during application, adds compliance and regulatory burdens to credit unions providing services associated with card use
- Changes will lead to a decrease of free checking accounts affecting low-income consumer the most.
- Passing the legislation would only benefit big box retailers who want to create their own routing network

House Passage: H.R. 582 Credit Union Board Modernization Act

- Allows Federal Credit Union Board to meet a minimum of six times a year, instead of the current 12 times in a year.
 - **Passed the House unanimously this legislation on January 30th, 2023**

Support: Legal Framework for Cannabis Banking

- **Create a safe structure for credit unions** who accept deposits from, extend credit to, or provide payment services to entities engaged in marijuana-related commerce **where such activity is legal.**

Support: Field of Membership (FoM) Expansion

- **Expanding field of membership to underserved communities improves the fiscal health of individuals in financial deserts**, who then must often turn to high-interest and fee pay day lenders
- Filed in 2022 by Rep. Waters H.R. 7003 and passed the house.

Support: Modernization of Federal Credit Union Loan Limits

- **Eliminate the current 15-year maturity limit on loans**, increasing affordable loan choices
- Exempt business loans made to businesses in underserved areas from the MBL cap
- **Modernize the expulsion of credit union members for cause and nonparticipation.**

Support: Increased Bank Secrecy Act (BSA) Thresholds

- Passed in 1970 without inflation adjustment, the current reporting thresholds for Currency Transaction Reports is \$10,000, and for Suspicious Activity Reports is \$5,000. Congress should pass legislation that **increases the CTR threshold to \$30,000, and the SAR threshold to \$10,000.**

Oppose: One-Size Fits All Elimination of Overdraft Programs

- As member-owned not-for-profits, these programs are designed by members and structured for members without predatory motive, but a valuable financial tool during crucial times.
- Without the safety net of credit unions offering this service, members will obtain it elsewhere outside of the financial services mainstream relying on fringe providers.