



May 10, 2021

Ms. Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Re: CAMELS Rating System; RIN 3133-AF32

Dear Ms. Conyers-Ausbrooks:

The Indiana Credit Union League (ICUL) appreciates the opportunity to comment on the National Credit Union Administration (NCUA) proposed rulemaking on the CAMELS Rating System. The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.7 million consumers.

The ICUL supports the addition of the "S" (Sensitivity to Market Risk) component to the existing CAMEL rating system and redefining the "L" (Liquidity Risk) component. We believe the separation can provide clarity and create more consistency with other financial institution regulators.

Although NCUA acknowledges there are no substantive new requirements and the change should not have an adverse effect on credit unions' CAMEL ratings, we encourage to NCUA to instruct examiners to work with credit unions that are adversely affected. We also ask NCUA to establish the final rule's effective date at least six months after its publication in the *Federal Register*. Additional time will allow credit unions to evaluate and implement any necessary internal reporting or tracking changes.

The ICUL appreciates the opportunity to comment on this Proposed Rule. 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