Purpose: The state-specific policy statements are an internal guidance document that is utilized by the GoWest Credit Union Association's advocacy team. The consensus-based statements provide our team members with a set of general guidelines that allow us to respond to pressing issues that arise at a moment's notice in the legislature, in discussions with elected officials, or with our regulators. Having general statements on important issues ensures the voice of our credit unions remains relevant and timely when pressing issues arise.

Access to Affordable Housing.
GoWest Credit Union Association recognizes that access to housing is an important issue that impacts every consumer and encourages initiatives that allow credit unions to meet the diverse needs of our citizens. Go West supports efforts to increase opportunities and access to affordable and workforce housing.

Access to Capital.
Capital is an important tool that can be utilized for growth and managing balance sheets. The association supports legislation and regulatory reforms that allow credit unions to access alternative sources of capital, as long as the inflow of alternative capital does not convey ownership.

ATM / ITM Surcharges.
The association supports a voluntary, market-oriented approach to ATM / ITM surcharges.

Bankruptcy Reform.
The association recognizes that consumers should have bankruptcy available to them but opposes any bankruptcy system that allows persons who could pay off their debts to declare bankruptcy needlessly. The association strongly supports efforts to encourage a needs-based bankruptcy system and establish a fairer balance between the rights of consumers and creditors. Furthermore, a meaningful bankruptcy philosophy must preserve the ability of credit unions and their members to reaffirm debts.

Building and Energy Code Reform.
The Association supports each state's ability to set standards for building and safety codes as it meets the needs of its citizens; however, it does not support a state, county, or municipality removing or reducing building and safety codes below the federal standards established by FHFA, FHLB or the GSEs, which will hurt a credit union members' ability to get a loan, buy or sell a home, or for the home to be proper collateral on funds being offered to a borrower.

Business Access to Financial Services.
The association supports eliminating federal and state barriers that prohibit or interfere with a credit union's ability to serve legally registered businesses.
**Capital Standard.**
The association supports regulators having the flexibility to manage capital standards and net worth requirements rather than having it hardwired in statute. During times of national emergency, regulators can make necessary adjustments to adjust these standards as deemed appropriate for the circumstances.

**Digital Assets, Blockchain Technology and the Future for Decentralized Finance.**
The Association supports efforts to develop digital assets platforms and technologies, from blockchain and cryptocurrencies to decentralized finance solutions; however, these developments should be done in fair and equitable manner to ensure credit unions are included and have equal access to the advancements and opportunities that may be afforded to all investors or participants. Moreover, we would call for a fair and equitable treatment of historical financial institutions along with breakthrough FinTech companies to ensure regulatory balance and fairness is in place for all participants in a future decentralized financial services arena.

**Consumer Disclosure Requirements.**
The Association supports disclosure requirements that educate the consumer and support the consumer's right to receive accurate and timely information on the terms and conditions of products and services offered by financial institutions. However, the association recognizes that the constant addition of additional disclosures inundates consumers with information making vital disclosures ineffective. Therefore, we oppose excessive disclosure requirements that fail to outweigh the benefits to the consumer.

**Consumer Privacy.**
The Association supports:
- Many of the privacy principles established by state and federal regulatory entities, including notice to the consumer, consumer choice, appropriate security standards, and equitable remedies.
- Additional business efforts to educate the consumer on how their personal information is used.
- The consumer's right to “opt out” of the sale or sharing of the consumer's personal financial information.

The Association cannot support legislation establishing an “opt in” standard, as this would pose a tremendous compliance burden and would hinder legitimate business practices.

**Consumer Choice.**
The Association supports a consumer's ability to choose the financial services institution that best aligns with their beliefs and values. As in other areas of our economy, there are for-profit and not-for-profit entities that serve the marketplace in a parallel manner but are differentiated in their business models, missions, and goals. We support and will defend a consumer's right to choose the best financial institution for each individual and their family.

**Cooperative Charter.**
The Association reaffirms its conviction that the cooperative charter model represents the best vehicle yet devised for serving the needs of consumers.
**Creditor Rights.**
The Association supports the robust protection of creditor lien rights, and laws that reinforce an equitable and efficient recovery process.

**Data Breach.**
The association supports legislative efforts to reduce consumer and financial institution fraud losses through legislation designed to increase the penalties for financial fraud and identity theft and allocate additional enforcement resources toward the prosecution of these crimes. The association supports legislation that would require negligent parties to reimburse financial institutions for costs associated with security or data breach notifications and costs stemming from the security breach. The association also supports legislation that requires third-party information custodians to promptly notify the financial institution of security breaches, allowing the financial institution to mitigate consumer losses.

**Director Liability.**
The association recognizes that the credit union system is made successful, in part, by credit union Directors. As such, the Association supports legislation designed to protect Directors against potential liability.

**Disclosure of Regulatory Enforcement Information.**
The association opposes the publication of regulatory enforcement documents such as documents of resolution, letters of understanding, or consent orders to the public. Although the association generally supports regulatory sunshine, these can be damaging to the financial institution’s reputation and should be privileged.

**Diversity, Equity, and Inclusion.**
The association supports legislative, regulatory, and broader initiatives that promote diversity, equity, and inclusion in financial services and a commitment to supporting people and communities who were historically and are currently underserved.

**Deposit Insurance / Private Share Insurance.**
The association supports a separate credit union insurance pool that is distinct from other financial institution insurance pools, independently governed and vested with the authority to promulgate insurance-related rules that account for the unique aspects of credit unions as cooperative, member-owned financial institutions. We oppose a federal deposit insurance mandate and support dual chartering through private alternatives to federal deposit insurance.

**Dual Chartering.**
The association strongly supports a regulatory system that allows dual chartering to thrive under the belief that dual chartering (the choice between a federal or a state charter) allows for the incubation of new powers and authorities and promotes credit union self-determination. The association supports legislation and regulation that serves to enhance dual chartering throughout the United States.

**Equal Access to Financial Services.**
The Association supports equal financial access for all communities and promotes the integral benefits of the cooperative structure in serving all members of our communities.
Environment, Social, Governance (ESG) Efforts.
The Association believes a free-market approach should be taken when making any future statute or regulatory change to ESG reporting requirements. Credit unions should be able to function in a manner that will allow each institution to serve their members in the manner that best meets the mission of each individual credit union, and they should be able to determine who they do and do not do business with, based on their own business plans and strategies, without the government creating a new protected class of business.

Field of Membership.
- **Idaho.** Idaho Credit Unions believe that all consumers have the right to improve their financial well-being through the services of not-for-profit, cooperative credit unions. The association supports reduced restrictions on fields of membership in order to permit credit unions greater flexibility to serve all consumers.

- **Federal.** The association supports the expansion of field of membership for federally chartered credit unions, under the Federal Credit Union Act and its implementing regulations, with the ultimate goal of allowing broader fields of membership to serve all consumers who desire credit union membership.

Financial Education.
As member-owned financial cooperatives, credit unions are a means by which individuals can improve their lives. GoWest Credit Union Association is dedicated to assisting consumers in achieving prosperity. The association actively promotes increased financial education among all age groups and supports efforts to teach personal financial management skills that empower individuals to achieve success.

Interchange
The Interchange system is an integral fee for service-based technology system that ensures a convenient and secure payment and settlement for credit card and debit card transactions. Credit unions use interchange fees to pay for fraud detection software, identity theft protection for impacted consumers, and to replace cards and PINs, as needed by their members. Any changes to the Interchange system, especially on credit care purchases, will force financial institutions to take on unsecured debt without reasonable access to fees, which will further reduce access to financial services, and hurt the underserved or unbanked, especially in rural parts of the country.

Investment
The Association supports the ability of credit unions to make investments in vehicles that best fit the needs and the risk tolerances of the credit union membership. Additionally, the association will continue to actively promote the ability for credit unions to more widely invest in technology companies and organizations that directly benefit the credit union and its membership. Arbitrary barriers to investing in solutions-based companies, especially those born from the movement will not aid in our growth and strength for the future.

Legislative and Regulatory Philosophy.
The association supports a statutory and regulatory framework that produces a diversity of options, powers, and authorities and will actively advocate for such, with a willingness to take on manageable risks, all the while supporting self-determination for individual institutions.
Lender Liability.
The association supports legislation that would minimize lender liability for damages or costs connected with the illegal or improper use of credit union property when this use is unknown to the credit union. Examples include the illegal use of credit union-issued cards for gambling purposes and environmental damages on credit union-owned property not created by the credit union.

Non-Partisan Status.
The association supports those individuals in public service that, in turn, support credit unions, their issues, and their philosophy, regardless of political party or affiliation.

Powers & Authorities.
Credit unions should have any power that—either exercised directly or through a CUSO—would benefit the credit union’s members.

Products & Services.
The association opposes any restrictions that would unduly hinder a credit union’s authority to deliver credit, savings, or ancillary products that are available elsewhere in the financial services marketplace. We support efforts to identify and eliminate predatory financial products and services.

Public Funds Deposits.
All credit unions within the association have the legal authority to accept public funds deposits, however, many governmental entities are limited in their ability to deposit public funds in credit unions. The association supports efforts to grant credit unions unlimited access to public funds deposits on an equal basis with other financial institutions.

We encourage governmental entities to work directly with the credit unions and other financial institutions, within the State of Idaho, to obtain the best return possible on taxpayer dollars; however, the association does not support brokering tax dollars outside of the state where proper oversight cannot be provided by state regulators.

Regulatory Accountability, Transparency, and Accreditation.
- The association supports a transparent, conservative, and accountable process for determining regulatory budgets, with the understanding that the costs of regulation are an expense to credit union members.
- The association encourages the NCUA to adopt an overhead transfer fee process that gives credit unions meaningful input on the process for determining regulatory oversight costs associated with insurance functions, as opposed to costs associated with safety and soundness functions.
- The association supports conservative financial services industry assessments that provide state and federal regulators with the resources necessary to attract the talent and expertise needed to adequately oversee the industry while calling on each regulatory body to look for ways to innovate, utilize technology, and to collaborate among their colleagues to reduce the burdens on Idaho credit unions’ staff and balance sheets.
- The association opposes the sweeping of funds from regulator accounts to the general fund or other dedicated accounts, as this reallocation represents an additional cost to credit unions and undermines the effectiveness of the regulator. We recognize the importance of the state regulatory body maintaining national accreditation through the
National Association of State Credit Union Supervisors (NASCUS). Accreditation of a state regulatory program not only signifies excellence as a regulator, but it also provides the certified expertise and greater ability for the state to push back against federal pre-emption when necessary.

Regulatory Environment.
The association supports efforts to reduce the regulatory burden on the credit union industry and legislative or regulatory efforts aimed at streamlining and simplifying regulatory requirements without significantly affecting consumer interests.

Self-Determination.
The association supports each credit union's efforts to fulfill its own mission and supports legislation or regulation that facilitates credit union self-determination.

State Bank.
Given the robust network of credit unions and other financial services entities already serving the people, businesses, and government entities in Idaho, GoWest Credit Union Association does not support the formation of a state, county or municipal bank, which would provide competing services to those offered by the private sector.

Systemic Risk.
The association recognizes that very large financial institutions may pose systemic risks to the U.S. economy. We believe that credit unions do not pose these same systemic risks because of their more restrictive regulatory environment, risk-averse nature, and their lack of aggregate size in relation to total U.S. financial institution assets. The association opposes the application of legislative and regulatory requirements designed to address systemic risks on credit unions.

Taxation.
The association supports efforts to maintain the credit union industry's historic tax exemption as not-for-profit, financial cooperatives. The association is committed to educating policymakers and the public on the value that members receive because of the cooperative, not-for-profit tax exemption.

Third Party Examination Authority.
The association recognizes that credit unions may rely on outside service providers for mission-critical functions and supports regulatory oversight concerning a credit union's due diligence efforts to appropriately select its service providers. The association also recognizes that in order to maintain nationally recognized accreditation, Idaho regulators must have the ability to examine third-party service providers. We will closely monitor the use of this ability and would call on regulators to ensure they have the proper expertise and experience to carry out any and all reviews of system partners.

Trade Names.
Credit unions should have the power and ability to operate under the trade name of their choice, recognizing that it is not the name, but their structure that makes credit unions distinct.
Transaction and Services Fees.
The association recognizes that transaction and service fees provide an important component in the safe and sound operations of credit unions. Moreover, we understand that interchange and related fees support the infrastructure and security of the financial services network, which provides a tremendous benefit to both American consumers and retailers themselves. The association supports the clear disclosure of agreements, rules, and guidelines applicable to all transaction and service fees, but opposes the requirement that internal negotiations or contracts be made public. The association opposes efforts to impose limits or artificial price controls on transactions, services, and/or interchange rates and fees. The association supports a system of free-market competition in the area of fees and recognizes that a loss of revenue in this area will be passed on to consumers in the form of more expensive products and services.