

BOARD ACTION MEMORANDUM

TO: NCUA Board

DATE: November 5, 2012

FROM: Office of General Counsel

SUBJ: Final Credit Ratings Rule

ACTION REQUESTED: NCUA Board approval to issue the attached final rule regarding credit ratings.

DATE ACTION REQUESTED: December 6, 2012.

OTHER OFFICES CONSULTED: Regional Offices, OCP, OCCU, OSCUI.

VIEWS OF OTHER OFFICES CONSULTED: Concur.

BUDGET IMPACT, IF ANY: None.

SUBMITTED TO INSPECTOR GENERAL FOR REVIEW: Yes.

RESPONSIBLE STAFF MEMBERS: Dale Klein, Senior Capital Markets Specialist, and Lisa Henderson, Staff Attorney.

SUMMARY: NCUA is issuing a final rule to implement statutory requirements in Title IX of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act) pertaining to the use of credit ratings to assess creditworthiness. The final rule removes references to credit ratings in NCUA regulations or replaces them with other appropriate standards of creditworthiness as required by the Dodd-Frank Act.

RECOMMENDED ACTION: The NCUA Board issue the attached final rule.

ATTACHMENT: Final rule.