

July 13, 2020

Policy Division  
Financial Crimes Enforcement Network  
PO Box 39  
Vienna, VA 22183

**Re: Docket Number FINCEN-2020-0003 and OMB control number 1506-0004, 1506-0005, and 1506-0064**

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the renewal of information collection relating to the currency transaction report (CTR) requirements.

Having the most accurate PRA burden calculation for CTRs is important as financial institutions expend vast resources filing these reports, and understanding this complete burden is an important step in determining whether the information gathered from CTRs is worth the cost to financial institutions to produce the reports. We agree that the two additions to the PRA burden calculation are relevant in determining the entire cost for filing CTRs. The cost to obtain data required by the report that the filer does not need for its own bookkeeping, and maintaining, updating, and upgrading the technological infrastructure required to file and store the report are a necessary addition to the PRA calculation. These costs are critical in determining the true costs for filing CTRs by financial institutions.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas  
President/CEO