



April 14, 2023

Department of The Treasury
Via Electronic Mail

Re: Comments to the Emergency Capital Investment Program ("ECIP") Initial Supplemental Reports and Quarterly Supplemental Reports. OMB Control Number: 1505-0275

Dear Sir/Madam:

Thank you for the opportunity to offer this Comment Letter to the U.S Department of Treasury ("Treasury") which includes a short comment for consideration regarding the Final Rule relating to the ECIP's Initial Supplemental Reports and Quarterly Supplemental Reports.

About Five Star Credit Union

Five Star operates as a not-for-profit, member-owned, financial institution that provides a means for members to save and borrow together. Originally chartered in 1964 as Cedar Springs Federal Credit Union, Five Star has grown through a combination of organic growth and 11 separate mergers to over \$764 million in assets with 17 financial centers in Southeast Alabama and South Georgia. As of March 31, 2023, the credit union had 55,460 member-owners.

Today, we serve 23 counties across Alabama and Georgia. This is a challenging region in which to provide financial services. Half of the counties we cover have been designated persistent poverty counties, meaning that that have had poverty rates of 20% or greater for at least 30 years. Additionally, almost a quarter of our census tracts are in a CDFI Investment Area.

Overall, our continued confidence is rooted in more than a half century record of delivering value, a strong balance sheet, and an amazingly talented team of directors and staff. We are grateful that our record will only be bolstered by the funds from the ECIP investment that Treasury made in our credit union. While there is nothing traditional about our current operating environment, success will continue to be measured by our ability to consistently deliver value to our members when it is needed the most.

At this time, we offer this Comment Letter to suggest a simple modification which might strengthen the Rule as proposed.

The Proposed Modification

As a general matter, we understand Treasury's desire to have the management of each ECIP recipient provide attestations with respect to the processes and controls around the data collected and presented



to the Treasury. And we agree that such a certification is both appropriate and reasonable considering the investment that Treasury has made in the subordinated debt of our credit union. As a practical matter, however, we are concerned that the current version of the Form of Process and Controls Attestation is rather inflexible. More specifically, we are concerned that the proposed version does not account for the fact that much of the information collected in connection with this program will (1) represent a new frontier for our staff and members alike, and will (2) be collected into systems which might not yet be fully equipped to store such information fields. As such, we expect a certain "learning curve" at our institution as our systems and our staff become fully acquainted with the new processes required by the ECIP investment.

Additionally, we suggest a slightly revised form of the attestation which accounts for some appropriate reliance on systems and processes that might be supported by third party vendors and products. For example, as part of the reporting process, we expect to run the collected addresses of our borrowers through professional geocoding tools. Against such a reality, the current version of the "Process and Controls Certification" seems overly conclusory. We respectfully suggest that the Treasury consider changing the statement in paragraph 2 that "[t]he processes and controls used to generate the Supplemental Reports of the Recipient's fiscal year ending December 31, 2022 are satisfactory" to: ***"upon my reasonable investigation and to the best of my knowledge, the processes and controls used to generate the Supplemental Reports of the Recipient's fiscal year ending December 31, 2022 are satisfactory"*** (emphasis ours). Such a change would require our senior executives to affirmatively investigate the credit union's processes but would remain flexible enough to allow for reasonable reliance on the process of expert systems beyond our ability to certify with absolute certainty.

Conclusion

We thank the Treasury for the consideration of this Comment Letter. And we are grateful for the Treasury's investment in our credit union and the opportunity to share our views on the ECIP's Quarterly Supplemental Reports. While we look forward to the Final Rule, we respectfully request that the Treasury give serious thought to the minor improvement we have summarized above.

Should you have any questions regarding our comments, please feel free to contact the undersigned at steensmab@fivestarcu.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert A. Steensma", enclosed within a large, loopy blue oval.

Robert A. Steensma
President/CEO