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**National Association of Federally-Insured Credit Unions**

July 29, 2019

The Honorable Nancy A. Berryhill  
Acting Commissioner  
Social Security Administration  
6401 Security Boulevard  
Baltimore, MD 21235

**RE: Enrollment Period for Electronic Consent Based Social Security Number Verification Service (Docket No. SSA 2019-0021)**

Dear Acting Commissioner Berryhill:

On behalf of the National Association of Federally-Insured Credit Unions (NAFCU), I am writing to you in regard to the Social Security Administration's (SSA) implementation of section 215 of the *Economic Growth, Regulatory Relief, and Consumer Protection Act* (EGRRCPA) to create a new electronic Consent Based Social Security Number (SSN) Verification (eCBSV) service. NAFCU advocates for all federally-insured not-for-profit credit unions that, in turn, serve over 117 million consumers with personal and small business financial service products. NAFCU is concerned that the short enrollment period and subsequent inability to enroll again for up to two years may disproportionately disadvantage smaller financial institutions like credit unions. Additionally, the proposed fees for the program are likely to make the service cost-prohibitive for some credit unions. NAFCU requests that you reevaluate the enrollment process and extend the July 31, 2019 deadline for initial enrollment or permit a second enrollment period during the expanded rollout in late 2020.

NAFCU thanks the SSA for permitting institutions to self-certify as a "permitted entity" to participate in the initial and extended rollout and is hopeful that this standard of self-certification will continue once the eCBSV is fully operational. Considering the short enrollment timeframe, many credit unions may not be aware of the opportunity to participate or have enough time to make a decision on enrollment. Additionally, given the high startup costs, many credit unions likely cannot afford to participate in the initial rollout. Credit unions, as not-for-profit, member-owned, community financial institutions, have limited resources and the current fee schedule would exclude most credit unions from participation. According to NAFCU's 2018 Report on Credit Unions, the median credit union manages only \$33 million in assets and has just eight full-time employees. Under the SSA's planned rollout, credit unions may be at a competitive disadvantage because they will not obtain familiarity with the new eCBSV for several years.

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The SSA should extend this week's deadline for initial enrollment to allow credit unions and other financial institutions more time to sign up for the eCBSV. Alternatively, the SSA should allow permitted entities to enroll for the eCBSV during the expanded rollout in late 2020 to minimize any potential disparity between those financial institutions that could sign up during the limited initial enrollment period and those who could not due to insufficient time and/or resources. Additionally, NAFCU encourages the SSA to consider ways to offer a reduced cost enrollment and participation fee for smaller entities. NAFCU recognizes that the SSA must limit enrollment to prevent an influx of permitted entities signing up and overwhelming the new system's capabilities; however, enrollment should be accessible for all financial institutions. The SSA should structure its rollout of this important, statutorily mandated new tool with attention to how financial institutions of all sizes may participate and how smaller financial institutions are likely to be impacted should the parameters of the rollout inadvertently prohibit their participation.

NAFCU appreciates your prompt attention to this important, time-sensitive matter. Going forward, NAFCU requests continued transparency regarding the progress of the eCBSV rollout and extended rollout as well as any updates in the fee schedules. If you have any questions or concerns, please do not hesitate to contact me at [akossachev@nafcuh.org](mailto:akossachev@nafcuh.org) or (703) 842-2212.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Kossachev". The signature is fluid and cursive, with the first name "Ann" being particularly prominent.

Ann Kossachev  
Director of Regulatory Affairs