The Department of Defense is reviewing all Code of Federal Regulations (CFRs) to comply with Executive Order (EO) 13771 “Reducing Regulation and Controlling Regulatory Costs” signed January 30, 2017, and EO 13777 Enforcing the Regulatory Reform Agenda signed February 24, 2017.

EO 13777 requires the designation of an agency Regulatory Reform Officer. It also requires the establishment of an agency Regulatory Reform Task Force (RRTF) to identify regulations that are among other things "outdated, unnecessary, or ineffective."

The DoD RRTF accepted the DoD’s Accounting and Finance Policy Directorate’s recommendation to consolidate 32 CFR 231 (and then repeal this CFR) into 32 CFR 230 and to update 32 CFR 230 since it was last published on September 5, 2001.

This recommendation will be on the calendar in June 2019.

STANCE
DCUC will remain vigilant on any changes to the current policy and will work with DoD to ensure Defense Credit Unions can continue to serve those who serve our country.

TALKING POINTS

- CFR 230 establishes policies and responsibilities for financial institutions that serve DoD personnel on DoD installations worldwide (enshrined in the DoD Financial Management Regulation).

- CFR 230 prescribes consistent arrangements for the provision of services by financial institutions among the DoD components.

- CFR 230 requires that financial institutions operating on DoD installations provide, and are provided, support consistent with the policies stated.

- What is troubling is news that the Department’s policies have changed, and the current part requires revision to reflect the revised responsibilities and arrangements. Yet, no one knows what policies have changed.

- Although DOD contends this is a cosmetic change that will combine redundant sections, anytime the regulation is open to comment, it threatens the “one bank – one credit union policy” along with other banking restrictions and/or predatory lender incursions onto the installation.

30 SECOND PITCH
"DCUC is concerned with any changes to the DoD Financial Management Regulation (FMR) via the Code of Federal Regulations. Anytime the regulation is open for changes, the opportunity to disrupt operations is a threat. DCUC will remain vigilant on any changes to the current policy and will work with DoD to protect the interests of our Defense Credit Unions and those whom we ultimately serve."