



**DCUC**  
DEFENSE CREDIT UNION COUNCIL

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**Jason Stverak**  
Chief Advocacy Officer

**March 16, 2026**

Melane Conyers-Ausbrooks  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

*Delivered electronically via: <https://www.regulations.gov>*

RE: Nondiscrimination Requirements [NCUA-2026-0034]

Dear Ms. Conyers-Ausbrooks:

On behalf of the Defense Credit Union Council (DCUC),<sup>1</sup> thank you for the opportunity to comment on the National Credit Union Administration's (NCUA) proposed rule regarding nondiscrimination requirements in lending. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

Credit unions are community-based financial cooperatives that prioritize fairness and equal access to financial services. For decades, they have demonstrated a strong commitment to responsible lending and nondiscriminatory access to credit for the communities they serve.

DCUC supports the NCUA's proposed rule to remove regulatory text that summarizes provisions of the Fair Housing Act (FHA) relating discrimination in real estate-related lending, appraisals, and advertising. Because these requirements are already established under the FHA and other federal statutes, such as the Equal Credit Opportunity Act (ECOA) and its implementing Regulation B, duplicating them within separate NCUA regulations is unnecessary. Eliminating duplicative provisions will help simplify the regulatory framework for credit unions while preserving all applicable consumer protections.

DCUC also supports the NCUA's proposal to rescind § 701.31 in its entirety rather than retaining portions of the section. As the Board notes, rescinding the entire section would eliminate the regulatory requirement that federal credit unions make available appraisals in connection with subordinate liens on a dwelling. We agree with the Board that this is sound business practice for federal credit unions but that it is unnecessary to maintain the requirement in regulation.

DCUC also supports the removal of § 701.31(d). Compliance with the Department of Housing and Urban Development's regulations implementing the FHA is sufficient to ensure adherence to federal nondiscrimination requirements, and repeating these requirements within separate NCUA regulations does not strengthen their validity.

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<sup>1</sup> The Defense Credit Union Council represents more than 200 defense-affiliated credit unions and over 40 million members—including active-duty servicemembers, Guard and Reserve personnel, veterans, Department of Defense civilians, and military families.

DCUC appreciates the NCUA Board's continued efforts to streamline and modernize its regulatory framework. We encourage the agency to continue engaging with credit unions through listening sessions and other outreach to identify additional opportunities to improve regulatory clarity and reduce unnecessary compliance burden.

Please contact me at [Jason.Stverak@dcuc.org](mailto:Jason.Stverak@dcuc.org) with any questions on these comments or other matters that impact the credit union industry.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Stverak", with a horizontal line extending to the right.

Jason Stverak  
Chief Advocacy Officer  
DCUC