



DCUC
DEFENSE CREDIT UNION COUNCIL

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Jason Stverak
Chief Advocacy Officer

March 30, 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: Requirements for Insurance [NCUA-2026-0136]

Dear Ms. Conyers-Ausbrooks:

On behalf of the Defense Credit Union Council (DCUC),¹ thank you for the opportunity to comment on the National Credit Union Administration's (NCUA) proposed rule to amend regulations governing the requirements for obtaining and maintaining federal share insurance with the National Credit Union Share Insurance Fund. This proposal would reduce regulatory burden by eliminating unnecessary and redundant requirements related to disclosing when nonmember accounts are not covered by federal share insurance. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's proposed change to eliminate § 741.10 of Subpart A of part 741 of its regulations, which requires federally insured state chartered credit unions (FISCUs) that are permitted under state law to accept nonmember shares or deposits to notify all nonmember account holders in writing that their accounts are not insured by the Share Insurance Fund. These requirements are redundant to disclosures FISCUs are required to make under the terms of NCUA Form 9600 as a condition of maintaining federal share insurance coverage.¹ As a result, § 741.10 does not provide additional protection to consumers but instead creates overlapping compliance obligations. Accordingly, retaining this requirement in regulatory text contributes to avoidable regulation duplication.

DCUC thanks the NCUA for making this change to streamline its regulations. We encourage the agency to continue engaging with the credit union industry through listening sessions and other outreach to identify additional opportunities to improve regulatory clarity and reduce unnecessary compliance burden.

¹ 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.

² See [NCUA Form 9600, Information to be Provided in Support of the Application of a State Chartered Credit Union for Insurance of Accounts](#), page 14.

Please contact me at Jason.Stverak@dcuc.org with any questions regarding DCUC's comments or other matters that impact the credit union industry.

Sincerely,

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

Jason Stverak
Chief Advocacy Officer
DCUC