



**DCUC**  
DEFENSE CREDIT UNION COUNCIL

1627 Eye St, NW  
Suite 935  
Washington, DC 20006

202.734.5007  
www.dcuc.org

**Jason Stverak**  
Chief Advocacy Officer

**January 27, 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: Guidelines for Safeguarding Member Information [NCUA-2025-1304, RIN 3133-AF76]

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) proposal to remove Appendix A to part 748, guidelines for safeguarding member information, from the Code of Federal Regulations (CFR). DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's proposal because the Appendix A provisions are a set of guidelines intended to assist credit unions with their statutory compliance obligations, and not regulatory requirements subject to enforcement. When Congress passed the Gramm-Leach Bliley Act (GLBA) in 1999, Section 501 of the Act, entitled Protection of Nonpublic Personal Information, required the NCUA, the federal banking agencies, and other regulators to establish appropriate standards for financial institutions subject to their respective jurisdictions relating to administrative, technical, and physical safeguards for customer records and information.<sup>1</sup>

Appendix A was issued to satisfy the NCUA's statutory obligation to establish appropriate standards for federally insured credit unions (FICUs) to protect the security and confidentiality of customer records and information and to protect against unauthorized access to or use of such records. The NCUA Board implemented these standards through an amendment to its existing regulation governing security programs in FICUs, as Appendix A to part 748.

However, the language of Appendix A does not contain prescriptive regulatory requirements. Rather, it provides guidelines, recommendations, and ways in which FICUs can maintain their

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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.

<sup>2</sup> See 15 U.S.C. 6801 et. seq. (Nov. 12, 1999) (“(1) to [e]nsure the security and confidentiality of customer records and information; (2) to protect against any anticipated threats or hazards to the security or integrity of such records; and (3) to protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any customer.”).

regulatory compliance. These guidelines are not exclusive, meaning there are presumably other ways to ensure compliance. We therefore agree with the NCUA's proposal that the contents of Appendix A should be published as a Letter to Credit Unions, which makes clear that the provisions are not in-and-of-themselves regulatory requirements but rather guidelines to satisfy regulatory requirements. This change would enable more efficient revisions and streamline the NCUA's regulations.

DCUC believes the NCUA's adoption of separate guidance is appropriate for communicating guidelines such as those in Appendix A, even if maintaining the status quo is consistent with the federal banking agencies whose guidance is in the CFR. While this change would not ensure that Appendix A is reviewed every three years as part of NCUA's one third regulatory review process, as the NCUA points out, we believe the NCUA can still review the text and make changes on an ad hoc basis.<sup>1</sup> A less formal process is manageable and nimbler given these provisions are guidance and not specific regulatory requirements subject to enforcement.

Furthermore, DCUC agrees with this proposed rulemaking as it is consistent with the direction of presidential executive orders.<sup>1</sup> We encourage the agency to review all its regulations to ensure guidance provisions are not included in regulatory text, where they can inadvertently be interpreted as requirements instead of supervisory recommendations or guidance. DCUC's position should not be interpreted as supporting a de-emphasis on data security or cybersecurity, issues we believe are among the most significant for credit unions. These guidelines, regardless of where they are published, should be clearly accessible to credit unions via the NCUA's webpage and communicated through frequent webinars so that credit unions have effective measures to protect themselves.

Lastly, we encourage the NCUA to post summaries of all upcoming regulatory changes in a separate highlighted section on its website, so that credit unions can identify the changes more quickly, immediately update their policies and procedures, and effectively train their teams.

DCUC looks forward to reviewing additional efforts by the NCUA to streamline and update its regulations. The NCUA's current approach is encouraging and one that we greatly support. Please contact me at [Jason.Stverak@dcuc.org](mailto:Jason.Stverak@dcuc.org) with any questions on this rulemaking or other matters that impact the credit union industry.

Sincerely,



Jason Stverak  
Chief Advocacy Officer  
DCUC

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<sup>3</sup> Indeed, as the NCUA points out in its proposed rule, it has amended Appendix A to address statutory changes and other issues outside of the three-year regulatory review schedule.

<sup>4</sup> See [Exec. Order No. 13,563](#), *Improving Regulations and Regulatory Review*, 76 Fed. Reg. 3821 (Jan. 21, 2011) (directing executive agencies to analyze regulations that are “outmoded, ineffective, insufficient, or excessively burdensome, and to modify, streamline, expand, or repeal them in accordance with what has been learned”); [Exec. Order No. 14,192](#), *Unleashing Prosperity Through Deregulation*, 90 Fed. Reg. 9065 (Jan. 31, 2025) (stating that “for each new regulation issued, at least 10 prior regulations be identified for elimination”).