



DCUC
DEFENSE CREDIT UNION COUNCIL

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Jason Stverak
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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: Corporate Credit Unions [NCUA-2025-1302]

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) proposal to amend its regulations governing corporate credit unions.¹ DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC strongly supports the NCUA's proposal. The NCUA is proposing to amend its regulations for corporate credit unions by removing the requirement that a corporate credit union's asset and liability management committee (ALCO) must have at least one member who is also a member of the corporate credit union's board of directors. The proposed rule would also remove filing requirements related to a corporate credit union's annual report and any management letter or other report issued by its independent public accountant. The intended effect is to reduce unnecessary regulatory burden and provide corporate credit unions with greater flexibility.

1. ACLO Committee Representation

DCUC supports the NCUA's proposed change to rescind the requirement that a corporate credit union's ALCO have at least one member who is also a member of the board of directors.¹ We agree with the Board that this current requirement is overly prescriptive and that a corporate credit union board should have the discretion to determine its ALCO membership. There is no gain or benefit in restricting a corporate credit union's preference in this instance.

2. Filing Requirements for a Corporate Credit Union's Annual Report

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 [12 CFR Part 704](#) (establishing special rules for all federal insured corporate credit unions).

³ See [12 CFR Part 704.8\(b\)](#).

DCUC also agrees that several of the filing requirements for corporate credit union annual reports are unnecessary.¹ We agree with the NCUA's proposed removal of the requirement to file a copy of an annual report and any management letter or other report issued by its independent public accountant with the NCUA within 180 days after the end of the calendar year, and the requirement for the NCUA to make the annual report available for public inspection. We also agree that the requirements related to untimely filings are unnecessary and should be removed. These filing requirements impose an unnecessary compliance burden with no benefit to the credit union industry or the public. This information is available to the NCUA through the examination process, as the NCUA points out.

While the NCUA did not change the requirement that corporate credit unions notify the agency within 15 days of losing an independent public accountant through dismissal or resignation, we ask that this requirement be changed to at least 30 days to ease compliance burden. The current timeline forces credit unions to rush in their notifications. A 30-day period is adequate to alert the NCUA while allowing credit unions the ability to respond thoughtfully.

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. As the agency finalizes its rulemakings, we encourage it to post summaries of all regulatory changes in a separate highlighted section on its website, so credit unions can easily track regulatory changes, immediately update their policies and procedures, and effectively train their teams.

Please contact me at Jason.Stverak@dcuc.org with any questions on this rulemaking or other matters that impact the credit union industry.

Sincerely,



Jason Stverak
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DCUC