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National Credit Union Administration  
Office of General Counsel

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March 9, 2018

Keith Leggett  
1135 Park Road, Unit 1201  
Sunset Beach, NC 28468

RE: Field of Membership (FOM)

Dear Mr. Leggett:

You have asked if the Federal Credit Union Act (FCU Act) permits an FCU, chartered to serve Anabaptists and Mennonites, to also serve individuals who share a core doctrinal belief and set of practices with those communities. The Anabaptist concept of Christian stewardship is a distinctive aspect of Anabaptism (of which the Mennonites are one denomination) that requires practitioners to "live simply, practice mutual aid with the church, uphold economic justice, and give generously and cheerfully."<sup>1</sup> Individuals who share this core doctrinal belief have a significant and meaningful affinity with other members of the Anabaptist tradition,<sup>2</sup> and we believe that such an FOM is a valid associational common bond.

The FCU Act permits an FCU to include within its FOM any group that shares a common bond of association, subject to certain numerical limitations applicable to multiple common bond credit unions.<sup>3</sup> The NCUA's FOM rules define, in relevant part, an "associational common bond" as a common bond comprised of members of a group "whose members participate in activities developing common loyalties, mutual benefits, and mutual interests."<sup>4</sup> Religious organizations, including *churches or groups of related churches*, are recognized associations within the meaning of the FOM rules and are automatically approved as satisfying the associational common bond requirements of the FCU Act.<sup>5</sup>

You also have asked about the permissibility of a "proposed" FOM regarding the Assemblies of God's fourfold mission. We have consulted with staff of the NCUA's Office of Credit Union Resources and Expansion, the office that accepts FOM applications, and they are not aware of a

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<sup>1</sup> Mennonite Church USA, *Article 21 – Christian Stewardship*, <http://mennoniteusa.org/confession-of-faith/christian-stewardship/>.

<sup>2</sup> 12 U.S.C. § 1751 note (the presence of "a meaningful affinity and bond among members, manifested by a commonality of routine interaction, shared and related work experiences, interests, or activities, or the maintenance of an otherwise well-understood sense of cohesion or identity is essential to the fulfillment of the public mission of credit unions").

<sup>3</sup> 12 U.S.C. § 1759(b).

<sup>4</sup> 12 C.F.R. pt. 701, App. B, Appendix I -Glossary.

<sup>5</sup> *Id.* at Ch. 2, §§ III.A.1.b (emphasis added); IV (rules for multiple common bond credit unions).

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specific, pending proposal from an FCU as you have described. Given the highly fact-specific nature of each FOM analysis, we are unable to address this aspect of your question without having the ability to review an actual FOM request.

Sincerely,

A handwritten signature in black ink, appearing to read "M. McKenna", followed by a horizontal line.

Michael J. McKenna  
General Counsel

OGC/BML:bhs  
SSIC 3000  
17-1219