



The National Association of State Credit Union Supervisors

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3 February 26, 2026

4 Melane Conyers-Ausbrooks
5 Secretary of the Board
6 National Credit Union Administration
7 1775 Duke Street
8 Alexandria, VA 22314

9 **RE: Comments on Proposed Rule – 12 CFR Part 740, Accuracy of Advertising**
10 **and Notice of Insured Status.**

11 Dear Ms. Conyers-Ausbrooks:

12 The National Association of State Credit Union Supervisors¹ (NASCUS) appreciates the
13 opportunity to submit comments on the National Credit Union Administration’s (NCUA)
14 proposed amendments² to 12 CFR Part 740 – Accuracy of Advertising and Notice of Insured
15 Status. NASCUS supports the Board’s efforts to modernize, streamline, and reduce
16 unnecessary regulatory burden through this deregulatory update.

17 Based on our review of the proposal and its expected impact we offer the following comments.

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19 **Support for the Proposed Amendments**

20 NASCUS supports the NCUA Board’s proposal to remove the prescriptive “official advertising
21 statement” requirements and related provisions under §740.0 and §740.5. The proposal
22 eliminates mandatory text and graphic requirements for most advertising while retaining
23 essential consumer protection obligations, including:

- 24 • Ensuring advertising remains accurate and not misleading
25 • Maintaining disclosures related to excess share insurance
26 • Continuing required display of the official NCUA sign at deposit-taking locations and
27 digital interfaces

¹ NASCUS is the professional association of the nation’s forty-five state and territorial credit union regulatory agencies that charter and supervise over 1,800 state credit unions. NASCUS membership includes state regulatory agencies, state chartered and federally chartered credit unions, and other important stakeholders in the state system. State-chartered credit unions hold approximately half of the \$2.4 trillion assets in the credit union system and are proud to represent nearly half of the 145 million members. The remaining six states lack state-chartered credit unions.

² 90 FR 60588

28 These changes offer meaningful regulatory relief, particularly for state-chartered credit
29 unions that must navigate differences between state, federal, and insurer-related advertising
30 standards. The proposed rule enhances clarity, reduces compliance costs tied to rigid
31 advertising requirements, and better reflects modern digital and social media marketing
32 environments—areas where traditional text-based statements are ill-fitted and sometimes
33 counterproductive.

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35 **Recommendation: Consolidate All Insurance-Related Disclosure Requirements**
36 **into a Single Unified Publication**

37 While NASCUS supports the rule as proposed, we encourage the Board to consider a broader
38 structural improvement: consolidating all NCUA insurance-related requirements into a
39 single, comprehensive, modernized publication.

40 Insurance-related requirements are currently distributed across several regulatory parts,
41 historical guidance documents, and interpretive materials. Related to advertising
42 requirements, for example, a federally insured state-chartered credit union must cross
43 reference NCUA R&R Part 741.211 with Part 740 to understand its insurance related
44 advertising requirements. Consolidation would create an easier-to-navigate and authoritative
45 source for both federally and state-chartered credit unions.

46 Housing these requirements in a unified document would reduce search time, improve
47 training efficiency, and simplify vendor and marketing compliance reviews. Since both state
48 and federal regulators rely on consistent insurance-related requirements, a single publication
49 would reduce interpretive friction, support uniform supervision, and enhance exam
50 consistency. Consolidation would allow NCUA to incorporate modern design standards,
51 digital disclosure expectations, and plain-language guidance in one place—improving
52 usability and transparency.

53

54 **Conclusion**

55 NASCUS appreciates NCUA’s continued efforts to modernize and streamline regulatory
56 requirements while preserving transparency and strong consumer protections. We support
57 the proposed amendments to Part 740 and encourage the Board to consider further reducing
58 compliance complexity through the consolidation of all insurance-related rules into a single,
59 comprehensive publication.

NASCUS Comments Proposed Rule Part 740, Accuracy of Advertising and Notice of Insured Status
Docket NCUA-2025-1436
February 27, 2026

60 We appreciate the opportunity to comment and welcome the chance to work collaboratively
61 with NCUA as this rulemaking progresses.

62 Sincerely,

63 -signature redacted for electronic publication -

64 John J. Kolhoff
65 Senior Vice President,
66 Policy and Supervision
67 NASCUS

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