



The National Association of State Credit Union Supervisors

March 30, 2026

Melanie Conyers-Ausbrooks Secretary
of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Proposed Rule – 12 CFR Part 741.10 Disclosure of Share Insurance

Dear Ms. Conyers-Ausbrooks:

On behalf of the National Association of State Credit Union Supervisors¹ (NASCUS), I appreciate the opportunity to comment on the NCUA's proposed removal of **Part 741.10 Of Subpart A** regarding disclosure of share insurance.

Part 741 of the NCUA's regulations implements Title II of the Federal Credit Union Act (FCU), which governs the National Credit Union Share Insurance Fund (SIF). It prescribes requirements that all FICUs must satisfy to obtain and maintain federal share insurance, as well as payment of insurance premiums and the capitalization of deposits with the SIF.

Currently, Part 741.10 requires Federally Insured State-Chartered Credit Unions (FISCUs) that are permitted by state law to accept non-member shares or deposits to:

- Identify non-member accounts as such on required reports for insurance purposes.
- Notify non-member share and deposit holders in writing that their accounts are not insured by the SIF, and
- Notify any future non-member share and deposit fund holders in writing as they open accounts.

The NCUA Board is proposing to remove Part 741.10 of Subpart A in its entirety.

NCUA's stated goals for removing the provision include:

- Eliminating duplicative or prescriptive rules that no longer reflect modern practices

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.



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NASCUS supports the removal of Part 741.10 for FISCUs.

NASCUS agrees with NCUA's assessment that Part 741.10 is unnecessary and redundant because of the similar disclosure obligations that are already imposed on FISCUs through their contractual SIF agreement and obligations.

With respect to the Board's request for additional comments on Part 741.9 regarding the prohibition on offering member shares not eligible for federal share insurance coverage NASCUS also supports consideration of removing of Part 741.9. While the volume of proposed rules currently published for comment has not provided sufficient time for a complete analysis of the implications of removing the prohibition on uninsured member shares, NASCUS supports changes that potentially provided greater flexibility for state credit unions. Furthermore, removing Part 741.9 *might* be beneficial should the credit union system obtain access to supplemental capital for net worth purposes on par with credit unions worldwide. However, we stress more time is needed to thoroughly analyze the implications of this change.

Conclusion

NASCUS supports NCUA's goals of reducing outdated, redundant, and overly prescriptive regulations and restoring the strength of the dual chartering system. We encourage NCUA to finalize the rule as proposed.

Thank you for the opportunity to comment. We are happy to discuss our comments further, at your convenience.

Sincerely,

-signature redacted for electronic publication -

Craig Money

Vice President, Regulatory Affairs

NASCUS