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NASCUS Urges Regulatory Modernization and Greater Clarity for State-Chartered Credit Unions in Comments to NCUA

Arlington, VA — The National Association of State Credit Union Supervisors (NASCUS) submitted a [comment letter](#) to the National Credit Union Administration (NCUA) in response to the agency's voluntary review of regulations under the Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA).

This letter drives the importance of improving regulatory clarity for federally insured, state-chartered credit unions (FISCUs). NASCUS urged NCUA to simplify and consolidate regulations applicable to FISCUs, noting that the current structure can be difficult to navigate and often requires institutions to search across multiple sections to determine which requirements apply. Greater clarity would reduce compliance burden, improve efficiency, and benefit both credit unions and examiners.

NASCUS also recommended targeted updates to corporate credit union regulations, noting that many provisions were adopted following the Great Recession and may no longer fully reflect today's operating environment. We encourage the NCUA to review areas such as investment concentration limits, liquidity management, and balance sheet flexibility to ensure corporate credit unions can continue to support the broader credit union system effectively while maintaining appropriate safeguards.

Additional recommendations included modernizing fidelity bond requirements through a more principles-based approach, supporting proposed updates to management official interlock thresholds, and streamlining NCUA's supervisory appeals process to provide clearer pathways for review and more timely resolution of disputes.

"NASCUS appreciates the NCUA Board's commitment to regularly evaluating its regulations and engaging stakeholders throughout that process," said NASCUS President and CEO Brian Knight. "The NCUA has demonstrated a willingness to consider meaningful improvements that reduce unnecessary burden while maintaining a strong focus on safety and soundness. These reviews help ensure regulations remain practical, effective, and aligned with the realities facing today's credit unions."

The letter also encourages the NCUA to continue advocating for legislative changes that would strengthen the Central Liquidity Facility and preserve important liquidity resources for the credit union system. Throughout its comments, NASCUS emphasized the importance of continued collaboration between regulators and industry stakeholders to maintain a strong, resilient, and adaptable credit union system.

NASCUS applauds the NCUA for voluntarily conducting a comprehensive review of its regulations, for its openness to stakeholder feedback, and its willingness to consider regulatory changes that improve clarity and reduce unnecessary burden. We encourage the agency to continue these efforts, as they provide an important opportunity to ensure regulations remain effective, practical, and appropriately calibrated to today's operating environment.

The comment letter can be read in full by [clicking here](#) or visiting NASCUS.org.

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NASCUS is the professional association of the nation's 45 state and territorial credit union regulatory agencies that charter and supervise 1,688 state credit unions. Our mission is to forge a vibrant dual charter system by promoting a relevant, growth-oriented, and healthy state charter option.

NASCUS's 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 half of the nearly \$2.46 trillion assets in the credit union system and are proud to represent nearly half of the more than 145 million credit union members. To learn more about NASCUS' benefits and offerings, visit NASCUS.org.