



February 9, 2026

Ms. Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

RE: Guidelines for Safeguarding Member Information (Docket No. NCUA-2025-1304; RIN 3133-AF76)

Dear Ms. Conyers-Ausbrooks:

On behalf of its member credit unions, the Cooperative Credit Union Association, Inc. ("Association") appreciates the opportunity to comment on the National Credit Union Administration (NCUA) Board's proposed rule on Guidelines for Safeguarding Member Information, which is part of NCUA's Deregulation Project. The Association is the state trade association representing approximately 170 state and federally-chartered credit unions located in the states of Delaware, Massachusetts, New Hampshire, and Rhode Island, which further serve over 4.4 million consumer members. The Association developed these comments in consultation with our members.

This proposed rule is one of four proposals issued as "Round One" of the NCUA Deregulation Project which the Association is commenting on. As proposed, NCUA would delete the "Guidelines for Safeguarding Member Information," which is "guidance" currently codified at Appendix A to Part 748 of NCUA rules, that the agency would reissue as other guidance documents such as Letters to Credit Unions.. In addition, federally-insured credit unions (FICUs) would remain subject to the substantive privacy requirements of the Gramm-Leach-Bliley Act, the Federal Credit Union Bylaws (codified at 12 C.F.R. pt. 701, Appendix A), and other applicable financial privacy laws.

The Association supports this proposal and urges the Board to finalize it as proposed, which should reduce compliance burdens on federally-insured credit unions (FICUs). In addition, the Association supports the NCUA Deregulation Project's shift away from overly prescriptive rules and towards a more flexible, principles-based credit union regulatory framework.

The Association agrees with the Board that the placement of this guidance in a federal regulation has been "confusing" because it made purported "guidance" appear to be legally mandatory regulatory requirements. Regulations have the force of law, whereas guidance does not have the force of law, as the Board has previously clarified in its "Interagency Statement Clarifying the Role of Supervisory Guidance

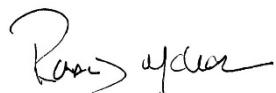
(Interagency Statement)" codified of Subpart D of Part 791 of NCUA rules. 12 C.F.R. §§ 791.19-791.21 & Appendix A to Subpart D.

We further agree that Letters to Credit Unions are a more appropriate administrative issuance in relation to guidance because it is clearer that NCUA guidance issued in letter form does not have the force of law.

The Association urges the Board to finalize this rule as proposed.

Thank you for the opportunity to comment on the NCUA Board's proposed rule on Safeguarding Member Information. If you have any questions or desire further information, please do not hesitate to contact the Association at (508) 481-6755 or govaff-reg@ccua.org.

Sincerely,



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