



April 27, 2026

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

RE: Post-Election Training for New Board Members
(Docket No. NCUA-2026-0430; RIN 3133-AF96)

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 Post-Election Training for New Board Members. This proposed rule is one of six proposals issued as "Round Six" of the NCUA Deregulation Project. The Association is the state trade association representing nearly 200 state and federally-chartered credit unions located in the states of Delaware, Massachusetts, New Hampshire, and Rhode Island, which further serve over 5 million consumer members. The Association developed these comments in consultation with our members.

The Association supports the Board's proposal to remove paragraph (b)(3) from the NCUA's Section 701.4 rule and urges the Board to finalize this change. However, we urge the Board not to renumber existing paragraph (b)(4) as "(b)(3)" unless it also makes a conforming amendment to the cross-reference to Section 701.4(b)(3) in the agency's Section 741.228 succession planning rule that applies to federally-insured state-chartered credit unions. See 12 C.F.R. §§ 701.4(b)(3), 741.228.

We believe that paragraph (b)(3) of Section 701.4 is unnecessary because it is redundant with the federal credit union board members' fiduciary duties under paragraph (b)(1) of the rule. Currently, paragraph (b)(3) requires directors of federal credit unions to have a working knowledge of basic finance and accounting practices, as well as the credit union's succession plan, within six months of election or appointment to the board.

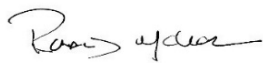
Paragraph (b)(3) is unnecessary because paragraph (b)(1) requires federal credit union directors to "Carry out his or her duties as a director ... with the care, including reasonable inquiry, as an ordinarily prudent person in a like position would use under similar circumstances..." 12 C.F.R. § 701.4(b)(1). A credit union board member would not likely be able to meet their fiduciary duty of care under paragraph (b)(1) unless they had, at least, a working knowledge of basic finance and accounting as well as an understanding of the credit union's succession plan.

Further, for some credit unions, paragraph (b)(1) would demand a higher level of financial expertise than paragraph (b)(3) depending on the specific facts and circumstances of the credit union in question. At a large, complex federal credit union, for example, board members' fiduciary duty of care under paragraph (b)(1) could demand a higher standard of financial expertise, depending on the nature of the credit union's operations. Also, having a variety of backgrounds on a credit union's board, including some individuals with non-financial expertise in areas like marketing, can be useful especially with respect to serving select employee groups or underserved communities that have unique financial services needs. NCUA's existing fitness and probity review of board members could be used to address any potential deficiencies in this area.

Since paragraph (b)(1) makes paragraph (b)(3) redundant, we urge the Board to finalize that aspect of this rule as proposed. However, we urge the Board not to renumber existing paragraph (b)(4) as "(b)(3)" unless it also amends the citation in the Section 741.228 succession planning rule that requires all federally-insured state-chartered credit unions (FISCUs) to comply with Section 701.4(b)(3). Otherwise, current paragraph (b)(4) would apply to FISCUs, which does not appear to be the Board's intent.

Thank you for the opportunity to comment on the NCUA Board's proposed rule on Post-Election Training for New Board Members. 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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