

- Credit Unions should be able to offer consumers an entry point to purchase and use digital assets.
 - Credit union members trust their credit union to provide necessary financial services, and the ability to provide new financial products and delivery channels is needed for credit unions to fulfill their mission.
 - Credit unions' focus on financial literacy and financial education can be extended to digital asset related products in order to help credit union members use these new financial products prudently.
 - Credit union members receive robust protections not available when obtaining financial services from fintech and other providers with a business model designed to skirt regulations.
- Without NCUA action, credit unions will fall behind.
 - State legislatures have taken notice of the rapid growth of the use of digital currencies and are rapidly rolling out the ability of state-chartered banks to provide digital asset related services that will leave state-chartered credit unions behind state-chartered banks unless the NCUA acts, as state legislatures are unlikely to push ahead of NCUA on authorizing credit unions to provide cryptocurrency and digital asset related services.
- Credit unions are concerned that digital currencies expand some providers' ability to offer products and services outside of the scope of regulations, and the ease at which they can be used to facilitate criminal activity.
 - Unlike many fintech companies, credit unions are not looking to use technology for regulatory arbitrage. Credit unions are most interested in innovation and technology that enables them to better deliver products and services to members.
- NCUA must take immediate action detailing credit unions' authority to provide custody services for cryptocurrency, and the Board needs to add digital asset related services to the list of preapproved permissible activities of CUSOs to allow them to provide cryptocurrency-related services.
 - Given the evolving nature of the financial markets and the increasing interest in purchasing and holding cryptocurrencies, credit unions must be able to offer their members convenient and useful services for the safe-keeping of those digital assets.
 - The ability of credit unions to offer digital assets services will further strengthen the cryptocurrency markets and promote increased stability and consumer confidence in what has largely been a decentralized financial product.
- The cryptocurrency and digital currency sectors currently operate largely outside of the traditional financial safeguards and generally without financial intermediaries where the role of stabilizer and protector generally rest.
- Congress should look for ways to regulate the delivery of financial services using distributed ledger technology (DLT) and digital currencies to ensure that consumers are protected in the same way if they received financial services from a financial institution.
- Congress should look for ways to enable credit unions and other financial institutions to provide digital asset related services, so that these services can be properly overseen by regulators.

State Regulatory Goals

- Credit unions seek parity with banks and FinTech providers in the crypto space. At a minimum, this would include:
 - Providing credit unions with custodial powers to hold crypto assets.
 - Giving credit unions the ability to enter into agreements with cryptocurrency third-party providers.
 - Allowing credit unions to engage in transactions using crypto as set out by regulators in any given state.
 - Permitting credit unions to collateralize loans with crypto-assets.