



CORNERSTONE LEAGUE

*Uniting & Inspiring Credit Unions
to Advance the Greater Good*

February 27, 2026

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

**Re: Comment Letter - Limits on Loans to Other Credit Unions
Docket No. NCUA-2025-23855**

Dear Secretary Conyers-Ausbrooks,

I am writing on behalf of the Cornerstone Credit Union League ["Cornerstone"]. Cornerstone is a trade association representing nearly 600 state and federal credit unions in a 5-state region which includes Arkansas, Kansas, Missouri, Oklahoma, and Texas. Thank you for the opportunity to voice our comments and suggestions.

Cornerstone appreciates the NCUA's efforts to reduce outdated or burdensome regulations. We support streamlining requirements to promote efficiency while maintaining safety and soundness.

Cornerstone offers the following comments on 12 C.F.R. 701.25 regarding loans to credit unions. Cornerstone supports the removal of § 701.25(b) because the Federal Credit Union Act already requires a federal credit unions' board of directors to approve all loans to other credit unions. Therefore, the rule is obsolete and largely redundant of an existing statutory requirement.

Cornerstone supports these amendments and agrees with the NCUA that credit union boards are in the best position to determine whether formal approval policies are necessary for such loans, consistent with the number, size, and risks associated with their own lending practices.

Should you have any questions or require additional information, please feel free to contact me at the email or phone number provided below.

Sincerely,

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