



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 - Catastrophic Act Reporting
Docket No. NCUA-2025-23856**

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Cornerstone appreciates the NCUA's efforts to reduce outdated or burdensome regulations.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. 748 regarding catastrophic act reporting. Amending the requirements for federally insured credit unions (FICUs) to report catastrophic acts will provide FICUs more time to notify the agency.

Eliminating the specific list of items to be documented will reduce the compliance burden and allow FICUs to focus their resources on recovery and core functions without compromising transparency and safety and soundness.

It can be difficult to determine the starting and ending point of cyber-attacks and the proposed changes reduce complexity, streamline responses and aligns the NCUA with other federal regulatory notice requirements (CISA).

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

Sincerely,

Suzanne Yashewski
Cornerstone Credit Union League
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