



**America's
Credit Unions**

Regulatory Comment: Guidelines for Safeguarding Member Information

THE ISSUE:

The NCUA is proposing to remove Appendix A to part 748, titled “Guidelines for Safeguarding Member Information,” from the Code of Federal Regulations (CFR). Appendix A implements the safeguards requirements of the Gramm-Leach Bliley Act (GLBA), requiring federally insured credit unions (FICUs) to protect the security and confidentiality of customer records and information and to protect against unauthorized access to or use of such records.

IMPACT TO CREDIT UNIONS:

The NCUA intends to replace Appendix A with a Letter to Credit Unions, which would permit more efficient revisions in the future, although no revisions are currently being proposed. The NCUA believes that the information conveyed in Appendix A can be provided through Letters to Credit Unions, thereby reinforcing its intended use as nonbinding guidance. In this regard, the proposed changes would not alter the substance of the guidelines but rather their supervisory weight. Potentially credit unions may have greater flexibility to demonstrate the sufficiency of their written information security programs under this more streamlined approach.

KEY POINTS:

- The proposal aims to delineate Appendix A as nonbinding supervisory guidance by reissuing it as a Letter to Credit Unions.
- Reissuing Appendix A as a Letter to Credit Unions would not change existing obligations related to proper disposal of consumer information under the Fair Credit Reporting Act (FCRA).

ACTION NEEDED: Deadlines and contacts

Please use the comment link below to respond to America's Credit Unions' survey. This will help shape the discussion and better address your needs in our comment letters.

- Comments due to America's Credit Unions: January 30, 2026 — [Submit here](#).
- Comments due to the NCUA: February 9, 2026
- Questions? Contact [Andrew Morris](#), Director, Innovation and Technology, America's Credit Unions
- Agency contacts: Gira Bose, Senior Staff Attorney, (703) 518-6540

QUESTIONS TO CONSIDER:

1. Do you support the removal of Appendix A from Part 748 of NCUA's regulations?
2. Should the NCUA make any substantive changes to Appendix A if it is reissued as a Letter a Credit Unions?
3. Do you foresee any potential risk that the state(s) in which your credit union operates will enact new laws or regulations in response to the NCUA's decision to reissue Appendix A as nonbinding guidance?
4. The other federal banking regulators currently implement their own information security guidelines and customer protection requirements through codified appendices in their respective regulations. Should the NCUA proactively address any potential public misunderstanding about the rigor of credit union information security guidelines relative to banks?

BACKGROUND:

Appendix A to Part 748 contains the high-level information security program guidelines relevant to a credit union's obligation under the GLBA to protect the security, confidentiality and integrity of member information. In general, these guidelines describe the need to conduct

periodic risk assessments, adopt policies for controlling and managing risk, and involve the board of directors in the oversight of information security programs. The other federal banking regulators (FDIC, OCC and FRB) have adopted similar guidelines which are codified as appendices in their respective regulations.

The NCUA is proposing to remove Appendix A as part of a broader deregulation project aligned with the goals of Executive Order 14192, “Unleashing Prosperity Through Deregulation.” Removing Appendix A from the CFR and reinstating it as a nonbinding Letter to Credit Unions would neither change the substance of the guidelines nor alter FICUs’ existing obligations under the GLBA or the FCRA to safeguard member information and ensure its proper disposal. Adopting Appendix A as a Letter to Credit Unions would mean that any future changes to the guidance would not necessitate a formal notice and opportunity to comment, as is normally the case with substantive rulemakings subject to the Administrative Procedure Act (APA). The NCUA believes that this tradeoff is worth the benefit of streamlining its rules.