



## **Regulatory Comment: Catastrophic Act Reporting**

### **THE ISSUE:**

The NCUA is proposing to amend Part 748 of its regulations by streamlining the catastrophic act reporting process, extending the time to report, and by eliminating the specific list of items to be documented.

### **IMPACT TO CREDIT UNIONS:**

The proposed changes to the catastrophic act reporting process are intended to alleviate regulatory burdens on credit unions that may find the current reporting window impractical while recovering from a natural disaster. By designating “NCUA” as the recipient of reports under the amended requirement (as opposed to a regional director), the agency can centralize and streamline the intake of these reports, ensuring they are routed efficiently to the appropriate personnel. Lastly, the elimination of specific items to be documented will help simplify the reporting process.

### **KEY POINTS:**

- The proposal aims to simplify, streamline, and extend the catastrophic act reporting process.
- The time to report a catastrophic act which disrupts vital member services would be extended from 5 business days to 15 calendar days.
- The proposal would amend the regulation to require that credit unions notify “NCUA” rather than the specific “regional director.”
- The proposal would remove the prescriptive list of items that a credit union should include in its internal record of a catastrophic act and replace it with a requirement that a credit union record the basic facts of the event.

## **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: February 16, 2026 — [Submit here](#).
- Comments due to the NCUA: February 27, 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 a 15 calendar day timeframe to report a catastrophic act to the NCUA?
2. Should the NCUA permit the use of existing notification tools, such as the form currently used to report cybersecurity incidents under section 748.1(c), to report catastrophic acts?
3. Should the NCUA consider any other changes to its catastrophic act reporting requirement?

## **BACKGROUND:**

Currently, Part 748 requires a FICU to notify the appropriate NCUA Regional Director within five business days of any catastrophic act that occurs at its office(s). NCUA regulations define a catastrophic act as "any disaster, natural or otherwise, resulting in physical destruction or damage to the credit union or causing an interruption in vital member services, as defined in § 749.1 of this chapter, projected to last more than two consecutive business days."

The NCUA is proposing to amend the catastrophic act reporting requirement as part of a broader deregulation project aligned with the goals of Executive Order 14192, "Unleashing Prosperity Through Deregulation." Revising the catastrophic act reporting requirement is intended to fulfill the agency's objective of alleviating regulatory burdens on credit unions. By

providing more time for FICUs to notify the agency of the occurrence of a catastrophic act and by eliminating the specific list of items to be documented, the NCUA expects the proposed rule to reduce their compliance burden and allow FICUs to focus their resources on recovery and core functions without compromising safety and soundness.

## AMENDED REGULATORY TEXT

The NCUA is proposing to revise § 748.1 as follows:

(b) *Catastrophic act report.* Each federally insured credit union will notify ~~the regional director~~ **NCUA** within ~~5 business days~~ **15 calendar days** of any catastrophic act that occurs at its office(s). A catastrophic act is any disaster, natural or otherwise, resulting in physical destruction or damage to the credit union or causing an interruption in vital member services, as defined in § 749.1 of this chapter, projected to last more than two consecutive business days. Within a reasonable time after a catastrophic act occurs, the credit union shall ensure that a record of the incident is prepared **that contains the basic facts of the event** ~~and filed at its main office. In the preparation of such record, the credit union should include information sufficient to indicate the office where the catastrophic act occurred; when it took place; the amount of the loss, if any; whether any operational or mechanical deficiency(ies) might have contributed to the catastrophic act; and what has been done or is planned to be done to correct the deficiency(ies).~~