



**Indiana Credit Union League**  
*The association of Indiana credit unions*

March 25, 2021

Ms. Melane Conyers-Ausbrooks  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314

Re: Risk-Based Net Worth—COVID-19 Regulatory Relief (“Complex” Threshold); RIN 3133–AF21

Dear Ms. Conyers-Ausbrooks:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the proposed rule Risk-Based Net Worth COVID-19 Regulatory Relief. The ICUL member credit unions represent 99% of assets and members of Indiana’s credit unions, with those memberships totaling more than 2.7 million consumers.

The ICUL supports NCUA’s proposal to raise the asset threshold for defining a credit union as “complex” for purposes of risk-based net worth (RBNW) requirements. By raising the asset threshold to greater than \$500 million and a RBNW requirement that exceeds 6%, it will provide capital relief to 1737 federally insured credit unions.

We recognize NCUA’s intent is to strike a balance between the safety and soundness of credit unions or the National Credit Union Share Insurance Fund (NCUSIF) and not restricting credit unions’ ability to meet the financial needs of their members. In these unprecedented times, it is important the NCUA find ways to remove barriers that will allow credit unions to engage in financial relief measures and provide more financial resources to their communities. The ICUL believe this proposal is appropriate because of the minimal overall risk to NCUSIF and the fact that it provides regulatory relief for 1737 credit unions.

The ICUL appreciates the opportunity to comment on the proposed rule. If you have any questions about our letter, please do not hesitate to give me a call at (317) 594-5320.

Sincerely,



John McKenzie  
President, Indiana Credit Union League