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DEFENSE CREDIT UNION COUNCIL

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

*Delivered electronically via: <https://www.regulations.gov>*

Re: Reimbursement of Dependent Care Costs for Federal Credit Union Officials [NCUA-2026-0067]

Dear Ms. Conyers-Ausbrooks:

On behalf of the Defense Credit Union Council (DCUC),<sup>1</sup> thank you for the opportunity to comment on the National Credit Union Administration's (NCUA) proposal regarding the reimbursement of dependent care costs for federal credit union (FCU) officials. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide, including institutions operating across multiple time zones and under unique operational demands.

DCUC strongly supports the NCUA's proposed rule to enable FCU boards to provide reimbursement of reasonable dependent care costs incurred by volunteer officials. This rule is an excellent example of modernizing regulations for today's environment as it would enable FCU boards to establish policies that allow for the reimbursement of reasonable dependent care costs incurred by volunteer officials while attending board meetings and performing official duties. DCUC agrees with this change because it will provide FCU's with greater flexibility to create better work-life balance for volunteer officials, thereby encouraging greater and broader involvement with the credit union industry. Credit unions that can attract the best possible board members for leadership positions create a foundation for success, which contributes to the safety and soundness of the credit union system.

This proposed rule would give FCU boards the discretion to adopt written policies that provide for the reimbursement or direct payment of dependent care costs. Therefore, such payments would not be mandatory and an FCU board of directors may adopt a more stringent policy or prohibit such reimbursement entirely.

Below is DCUC's feedback in response to the NCUA's specific questions for comment.

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<sup>1</sup> The Defense Credit Union Council represents more than 200 defense-affiliated credit unions and over 40 million members—including active-duty servicemembers, Guard and Reserve personnel, veterans, Department of Defense civilians, and military families.

*(1) Should the NCUA adopt additional conditions on paying dependent care costs, such as limiting reimbursement to temporary costs that are above and beyond regular day care expenses that a volunteer official would ordinarily incur outside of carrying out official credit union business?*

DCUC believes the proposal appropriately balances flexibility and oversight. FCU boards are in the best position to determine reimbursement policies based on their operational needs. Through its supervisory process, NCUA can reinforce the regulatory requirements by assessing board written policies and their consistent application.

*(2) Should the terms “dependent” or “dependent care” be defined by the NCUA regulations, the required FCU written reimbursement policy, or in some other governing document? If so, how should they be defined?*

DCUC does not believe it is necessary to further define “dependent” or “dependent care.” Federal credit union boards will understand the limitations of the requirements and create policies accordingly. We do not believe additional specificity is necessary in the regulatory requirement. Any interpretive issues or agency concerns can be addressed in the supervisory process.

*(3) Are there any other terms, definitions, or standards that the NCUA Board should consider in updating the regulation? Specifically, are there terms that could be clarified?*

DCUC does not have any recommendations for further definitions, terms, or standards for this regulatory change. We believe the proposed regulatory amendments are clear and any questions or clarifications can be addressed through supervisory guidance and managed in the supervisory process.

*(4) What documentation requirements could ensure the direct application of funds to reasonable dependent care costs and that the FCU is not compensating its volunteer officials?*

Federal credit union boards can request invoices and/or receipts of payment to prove payment for dependent care expenses. These administrative processes can go through periodic oversight by the board or audit function.

*(5) Are similar considerations for prohibiting the payment of lost wages (for example, dissension among FCU board members, additional IRS reporting requirements, and difficulty substantiating officials' claims) relevant to dependent care costs?*

No, payment for dependent care during board meetings or official duties aligns more with the definition of reimbursement of reasonable expenses. This payment, when tied to board meetings, mandatory training, and official duties, differs from compensation for lost wages.

*(6) How many FCU board meetings are in the evenings or at other times when dependent care for volunteer officials would be necessary or appropriate (for example, virtual meetings)?*

While DCUC does not have comprehensive quantitative data on this issue, our member credit unions report that board meetings and committee activities do occur outside of normal business hours to accommodate volunteers that work full or part time. Therefore, there are likely instances when dependent care for volunteer officials would be necessary or appropriate. Board members working in different time zones may also require special arrangements to attend meetings or other official events.

*(7) What are other situations where dependent care cost reimbursement for volunteer officials would be necessary or appropriate (for example, training)?*

DCUC believes this reimbursement could be necessary during official board meetings, board committee meetings, official duties, required training, and other duties required to fulfill board member fiduciary responsibilities.

*(8) What industry data or estimates provide insight into the number of volunteer officials affected by this proposal, both presently and in the future?*

While quantitative data regarding volunteer officials affected by the proposal is limited, DCUC's credit union member feedback indicated that this proposed change would positively impact many FCU board members because dependent care is a common barrier to volunteer board member involvement. This barrier is especially apparent for dual-income and military households that manage irregular schedules and different time zones.

*(9) What impediments, including estimated costs and logistics, does your credit union anticipate in developing and applying reimbursement policies that include dependent care costs?*

DCUC does not anticipate there will be issues for FCUs in developing and applying reimbursement policies that include dependent care costs. If issues arise, FCU boards can readjust their policies as this reimbursement would not be mandatory.

*(10) Should an FCU get an attorney's opinion about state laws related to corporate waste before it adopts and applies such a policy?*

Federal credit unions have the discretion to seek legal advice where appropriate. However, clear and consistent application of this regulation should reduce uncertainty and limit the need for outside legal interpretations.

*(11) If reimbursing dependent care costs would result in possible increases in costs to members, are there less costly alternatives?*

Federal credit unions can certainly make this assessment and provide other alternatives if reimbursement is too costly or not feasible.

*(12) Are there best practices from FISCUs or other suggested boundaries for dependent care cost reimbursement that the NCUA Board should consider?*

DCUC is evaluating state policies on this issue and will share any best practices we discover with the NCUA.

In addition to these questions, the proposed rule asked for comments on how the NCUA's action of permitting dependent care reimbursement for volunteer officials can better support credit unions in attracting new talent to the credit union system. DCUC believes that this regulatory change will help broaden the pool of possible volunteer board members because it will remove a common barrier to this type of volunteer service. As stated above, this policy change is especially significant for members of the military community and their families who face unique scheduling challenges, deployment, and unpredictable family care responsibilities.

The NCUA also invited comment on the inclusion of associate directors, directors emeriti, and other volunteer officials in FCU reimbursement policies that include dependent care costs. DCUC believes that if there is an assigned role that is essential to the governance of the FCU, then the volunteer in that role should be eligible for reimbursement for dependent care during mandatory meetings and official duties. Extending reimbursement beyond such roles is not necessary.

DCUC greatly appreciates the NCUA's work on this proposed rule and its thoughtful approach to modernizing its regulatory requirements. These types of policy changes provide flexibility for credit unions while maintaining the safety and soundness of the industry.

Please contact me at [Jason.Stverak@dcuc.org](mailto:Jason.Stverak@dcuc.org) with any questions about DCUC's comments or if you would like to discuss our feedback in further detail.

Sincerely,



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