



January 4, 2021

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

Re: Role of Supervisory Guidance; Docket ID NCUA-2020-0098

Dear Ms. Conyers-Ausbrooks:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the Role of Supervisory Guidance proposal. The ICUL member credit unions represent 99% of assets and members of Indiana's federally and state-chartered credit unions, with those memberships totaling more than 2.7 million consumers.

ICUL supports the regulatory agencies' effort to clarify the distinction between regulations and supervisory guidance. This proposal and the 2018 Statement Clarifying the Role of Supervisory Guidance reaffirms our understanding that supervisory guidance does not create binding, enforceable legal obligations and describes the appropriate use of supervisory guidance by the agencies. Furthermore, we agree with proposed reiteration that enforcement actions will not be based upon potential violation or non-compliance with supervisory guidance.

Supervisory guidance can be a valuable tool for credit unions because it assists with rule interpretations, clarifies how a rule applies to various situations, and provides transparency and uniformity on what examiners consider examples of appropriate practices. We urge NCUA to continually ensure examiners are not using the guidance as a basis for adverse findings.

We appreciate the opportunity to comment on the Role of Supervisory Guidance proposal. We ask the NCUA to consider our comments as discussed above. 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