



Indiana Credit Union League
The association of Indiana credit unions

July 31, 2023

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

Re: Charitable Donation Accounts; RIN-3133-AF56

Dear Ms. Conyers-Ausbrooks:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on NCUA's Proposed Rule amending Charitable Donation Accounts (CDAs). The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.8 million consumers. The ICUL supports the Agency's proposed expansion of CDAs to include "war veterans' organizations."

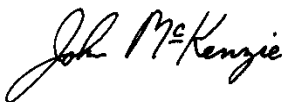
This proposed rule refers to "war veterans' organizations" (also referred to as "veterans' organizations") under section 501(c)(19) of the Internal Revenue Code to the definition of a "qualified charity" that a Federal Credit Union may contribute to using a charitable donation account. A "veterans' organization" must also meet certain requirements, such as having at least 75 percent of its members being past or present members of the U.S. Armed Forces and having no part of net earnings that benefit any private shareholder or individual.

We also ask the Agency to continue expanding the types of charitable non-profit organizations that qualify as CDAs in order to better represent the diverse interests of credit unions and their members. For example:

- 501(c)(4): Civic Leagues, Social Welfare Organizations, and Local Associations of Employees.
- 501(c)(6): Business Leagues, Chambers of Commerce, and Real Estate Boards.
- 501(c)(7): Social and Recreational Clubs.
- 501(c)(29): Qualified Nonprofit Health Insurance Issuers.

The ICUL appreciates the opportunity to comment on this proposal. If you have any questions about our comments, please do not hesitate to contact me at johnm@icul.org or (317) 594-5320.

Sincerely,



John McKenzie, President
Indiana Credit Union League