



## 2026 POLICY PRIORITIES FOR CREDIT UNIONS

*CrossState's policy priorities for 2026 focus on protecting, empowering, and advancing credit unions. Each identified priority is critical to continuing credit union growth and better supporting members.*

### PROTECT

#### **Protect and Reinforce the Credit Union Tax Status**

The credit union federal tax status is an integral part of credit unions' structure, allowing them to focus on their mission of "people helping people." We are committed to preserving this status to help advance communities, keep local economies strong, and improve the financial future of all individuals.

#### **Protect Interchange**

We will fight to protect affordable access to credit and ensure that consumers and merchants continue to receive the protections and benefits made possible through ubiquitous access to electronic payments supported by interchange fees. Needless and harmful changes to the credit card system and additional limits on debit interchange would only enrich merchants while significantly increasing both consumer and financial institution risks.

#### **Support an Independent Credit Union Regulator**

We support an independent regulatory regime with an independent credit union regulator and a full bipartisan board that understands credit unions' unique challenges and needs while providing right-sized regulations that safeguard credit union members without regulatory overreach.

#### **Reform CFPB Structure and Rulemaking**

We will enact Consumer Financial Protection Bureau (CFPB) reforms to establish stability and increased oversight, including a bipartisan leadership structure and funding through the annual congressional appropriations process. We support rulemaking within statutory mandates, through correct processes, and using meaningful cost-benefit analysis.

## **Promote Regulatory Fairness**

We will fight to prevent arbitrary barriers to consumers and businesses that rely on credit unions. This includes establishing right-sized rules and differentiating the reasonable fees charged by depository institutions from the CFPB's misleading "junk fees" terminology that targets well-disclosed legally permissible fees, like overdraft protection and late fees. Many of these fees are used to fund the operations of the credit union and help the institution offer products and services designed to meet the needs of all its members.

## **Protect Elders from Financial Exploitation**

We are committed to strengthening protections for older adults by ensuring that financial institutions have clear authority to identify, report, and temporarily delay suspicious transactions when financial exploitation is suspected. As fraud and abuse targeting seniors continue to rise, empowering credit unions to act quickly and with the proper authorities helps safeguard vulnerable members and prevent irreversible financial harm.

## **EMPOWER**

### **Enhance Fraud Prevention**

Credit unions should have the tools to protect their members from fraud. We're committed to combating it in all forms and establishing improved ways to proactively prevent and protect members from it. Additionally, entities that enable or are responsible for fraud should be required to make consumers whole in order to reinforce trust in the financial system.

### **Establish a Federal Data Security Standard**

We will promote a single, comprehensive national data security and privacy standard that protects consumers' and small businesses' financial data and holds negligent actors accountable. This standard must preempt state laws, account for credit unions' existing compliance with the *Gramm-Leach-Bliley Act*, and include robust requirements that apply to all who collect or hold personal data.

### **Ensure a Fair Regulatory Environment**

We aim to ensure that all financial providers operate in a fair regulatory environment, under the same rules, and with the same consumer protection requirements. Supervised credit unions should not be subjected to regulatory disadvantages compared to entities that lack a functional regulator or are not subject to regular examinations. Big government encroachment into the financial services market as well as the expanded role of under-

supervised entities create challenges for credit unions trying to provide services to their members.

## **Financial Education Opportunities for Consumers and Credit Unions**

We will explore legislation to provide consumers and credit unions with focused financial education opportunities that increase financial inclusion and well-being, enhance consumer protection, and promote economic stability.

## **ADVANCE**

### **Expand Access to Credit Unions**

Our enduring goal is to give more people and businesses the ability to join and partner with a credit union for their financial needs. Opposing efforts to impose burdensome regulatory speedbumps on credit unions, challenging attempts to stop or slow the pace of credit union growth, and supporting needed modernizations and programs will ensure that credit unions can continue to focus on doing what they do best—helping their members.

### **Modernize the Credit Union Charter**

We will support efforts to revamp outdated provisions that impede growth, pushing for a competitive dual-chartering system that provides greater opportunities for credit unions to invest in people and communities.

### **Create Greater Business and Mortgage Lending Flexibility**

We aim to expand and enhance credit unions' ability to lend to consumers and small businesses, giving each more lending options to help fuel the success of Main Street America. This includes relief from the member business lending cap, updating maturity limits, and transitioning to a floating interest rate ceiling.

### **Advance Financial Innovation and Technological Parity**

We will encourage the development of a comprehensive regulatory framework for new and emerging technologies, including digital assets, payment innovation, AI tools, and machine learning. This framework should deliver effective oversight and a level set approach for all providers while allowing credit unions the regulatory flexibility to easily incorporate and innovate. We support regulatory sandboxes, no action letters, and pilot programs focused on enabling credit union experimentation with new technologies or business models.

## **Support Better Housing Affordability**

We aim to expand credit unions' ability to join the Federal Home Loan Banks, work with government-sponsored enterprises to create more channels for credit unions to access the secondary mortgage market, and offer tools to help credit unions create solutions to address the housing needs of their members.

## **Push for Credit Union Inclusion in Capital Relief**

It is critical that credit unions are included in any bank capital relief or regulatory reforms and that Congress encourages the NCUA to provide comparable relief when banking regulators adjust capital standards. As economic conditions evolve, capital requirements should adapt so credit union earnings can be put to productive use—supporting members, expanding access to credit, and fueling economic growth—rather than being tied up by outdated risk assumptions.

## **Support Reg CC Modernization**

We aim to support a rethinking of funds-availability rules under Regulation CC to better reflect today's fraud environment and payments landscape. Persistent and sophisticated check fraud exploits regulatory hold-time limits that were designed for a paper-check era. Credit unions need flexibility to place longer, risk-based holds on check deposits, particularly for potentially fraudulent items, while encouraging a broader shift toward electronic payments.

Modernizing Reg CC would strengthen fraud prevention, protect members and institutions from avoidable losses, and align federal rules with ongoing efforts to reduce reliance on paper checks in the federal disbursement process.