

March 30, 2018

Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

**Re: Involuntary Liquidation of Federal Credit Unions and Claims Procedures**

To Whom It May Concern:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment concerning the National Credit Union Administration's (NCUA) involuntary liquidation of federal credit unions and claims procedure requirements.

HCUA supports NCUA's efforts to clarify the procedures that apply to claims administration for insolvent credit unions under involuntary liquidation. The proposed rule helps clarify existing rules and ensure uniformity among agency regulations by providing employees of insolvent credit unions the opportunity to have their final paycheck include accrued but unpaid sick/vacation leave, compensation for the period before the liquidation and any severance in which the employee was entitled, provided that that the credit union has adopted policies in accordance with such objectives. HCUA believes that the proposed rule would ensure the employees of insolvent credit unions are treated fairly as it relates to their contractual employment agreements.

As always, we appreciate the opportunity to review this issue regarding involuntary liquidation of federal credit unions and claims procedure requirements. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas  
President/CEO