



Jim Nussle
President & CEO

Phone: 202-508-6745
jnussle@cuna.coop

99 M Street SE
Suite 300
Washington, DC 20003-3799

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The Honorable Rodney Hood
Chairman
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Dear Chairman Hood:

As you know, the supply chain attack on the SolarWinds Orion Platform and subsequent customer breaches has impacted every corner of the economy, including the Federal government, banks, credit unions and other entities.

We understand that the National Credit Union Administration (NCUA) is currently analyzing its systems and inventorying its vendors to determine whether the agency has been impacted by the SolarWinds attack. As the NCUA seeks to determine the attack's impact on the agency and as credit unions do the same, CUNA members have two concerns. First, we urge the agency to be forthright in its communications with credit unions if it is determined that the agency is impacted. Second, we call on NCUA to suspend the collection of data from credit unions until it can ascertain that its systems have not been and are not compromised.

Further, we believe several credit unions may use or have used the compromised SolarWinds product and that this compromise could trigger Appendix B, Part 748 incidence response requirements. Because it is likely that many credit unions impacted by the attack will be subject to a similar fact pattern when determining what actions to take, we suggest the NCUA consider issuing guidance as this would alleviate stress from impacted credit unions.

Credit unions will look to the NCUA for guidance while mitigating any compromises from the attack. Recovery could be complex and resource intensive; therefore, any assistance from the NCUA will only help ensure that credit unions can continue to seamlessly provide financial services to members.

On behalf of America's credit unions and their more than 120 million members, thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Jim Nussle".

Jim Nussle
President & CEO