
CU PolicyPro

Policy Guidance

March 2018

KEY

- MP** = **Mandatory Policy – credit union must have a policy covering the subject matter contained in the CU PolicyPro Policy.**
- MO** = **Mandatory if service/product offered – if the credit union offers the service or product addressed in the policy, it must have a written policy regarding the service/product.**
- CM** = **Compliance Mandatory – the credit union need not have a specific policy but must comply with the subject matter of the policy (e.g., the policy reiterates the provisions of a regulation).**
- CMO** = **Compliance Mandatory if offered – the credit union need not have a specific policy but must comply with the subject matter of the policy if service/product is offered.**
- R** = **Recommended policy – credit union need not have a policy covering the subject matter and the contents do not reflect compulsory actions but we recommend both the adoption of the policy and compliance with its contents.**
- O** = **Optional – whether to have the policy or to conform to the policy is entirely up to the business judgment of the credit union.**
- *** = **See special notes pertaining to lending in Section 7000.**

If a policy is required by regulation the regulatory citation will be listed in parenthesis beside the policy name. For information on policies required by state legislation contact your League.

Disclaimer:

League InfoSight is neither providing legal advice nor assures that adoption of any or all of the policies contained in the CU PolicyPro Manual constitutes full compliance with all laws, regulations, and/or legal obligations of the purchaser/user. The contents of this guide and CU PolicyPro are intended as guidance only and not as legal advice or assurance of legal compliance. Regulations and policy requirements are subject to change. This guide addresses requirements applicable to federally insured state chartered credit unions. Users are strongly advised to consult with counsel and/or auditors and examiners regarding the sufficiency and completeness of the user credit union’s entire set of policies and the applicability of the policies contained in this manual.

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Section	Policy Title	KEY
1000	ADMINISTRATIVE	
1100	Leadership	O
1110	Mission Statement	O
1120	Vision Statement	O
1130	Credit Union Values	O
1140	Credit Union History	O
1150	Field of Membership	R
1160	Strategic Planning	R
1170	Equal Opportunity Statement (<i>12 CFR 1002</i>)	CM
1200	Organization	R
1205	Board of Directors Duties	R
1210	Compensation, Reimbursement and Indemnification	R
1220	Bond and Insurance Coverage	R
1230	Regulatory Compliance	CM
1235	Education & Volunteer Training Guidelines	R
1240	Enterprise-Wide Risk Management	R
1300	Audits	R
1400	Legal Counsel	O
1500	Staffing	O
1505	Whistleblowing Protection Policy	R
1510	Nepotism	O
1520	Succession Planning (<i>NCUA Examiners Guide</i>)	CM
1530	Employee Use of Social Media (<i>FFIEC Social Media Guidance</i>)	MP
1531	Credit Union Use of Social Media (<i>FFIEC Social Media Guidance</i>)	MP
1540	Complaint Policy for Federally Chartered Credit Unions	R for FCUs
1541	Complaint Policy for State Chartered Credit Unions	R for SCUs
1600	Code of Ethics and Diversity (<i>NCUA 701 Appendix A, Article VI</i>)	CM
1610	Confidential Information (<i>12 CFR 1016</i>)	MP
1615	Privacy (<i>12 CFR 1016</i>)	MP
1616	Anti-Phishing	R
1620	Conflict of Interest (<i>NCUA 701 Appendix A, Article VI</i>)	CM
1640	Credit Union Assets	R
1645	Fraud	CM
1650	Gifts, Bribes, or Kickbacks	R
1680	Political Contributions	O
1685	Software Licensing	MO

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Section	Policy Title	KEY
2000	OPERATIONS	
2100	General Operations Policies	O
2110	Bank Secrecy Act/Anti-Money Laundering (<i>NCUA 748.2</i>)	MP
2112	BSA - Marijuana-Related Business Accounts (<i>FIN-2014-G001</i>)	MO
2113	BSA – Not Servicing Marijuana-Related Business Accounts	R
2120	Cash (<i>NCUA Examiners Guide</i>)	MP
2125	Teller Over/Short (<i>NCUA Examiners Guide</i>)	MP
2130	Dual Control (<i>NCUA Examiners Guide</i>)	MP
2140	Purchasing	MP
2145	Office of Foreign Asset Control	MP
2150	Signing Authority	MP
2185	Third Party Due Diligence & Oversight (<i>NCUA Letter 07-CU-13</i>)	MP
2190	Disaster Contingency Planning (<i>NCUA Letter to Credit Unions 08-CU-01, 01-CU-21 and 06-CU-06</i>)	MP
2191	Chain Of Command (<i>NCUA Letter to Credit Unions 08-CU-01</i>)	MP
2192	Emergency Powers (<i>NCUA Letter to Credit Unions 08-CU-01</i>)	MP
2193	Statement Of Decision Criteria (<i>NCUA Letter to Credit Unions 08-CU-01</i>)	MP
2195	Pandemic Influenza Preparedness & Response (<i>NCUA Letter to Credit Unions 08-CU-01, 01-CU-21 and 06-CU-06</i>)	MP
2200	Member Services	R
2205	Unlawful Internet Gambling (<i>NCUA Regulatory Alert 10-RA-08</i>)	MP
2210	Accounts	MO
2211	Business Accounts	MO
2212	Individual Retirement Arrangements	MO
2213	Trust Accounts	R
2214	Health Savings Accounts	R
2215	Account Ownership	R
2216	Deceased Depositor Issues & Estate Accounts	R
2217	Negative Account Balances	R
2218	Dormant Accounts	R
2220	E-Commerce (<i>Letter to Credit Union 02-CU-17</i>)	MO
2221	Web Site	R
2222	Electronic Communications/Acceptable Use	MO
2223	Children's Online Privacy Protection (16 CFR 312)	CMO
2225	Remote Banking	MO
2226	E-Statements	CMO
2227	Electronic Signatures	MO
2232	Member Expulsion	R
2235	Member Abuse	R

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Section	Policy Title	KEY
2000	OPERATIONS (continued)	
2240	Member in Good Standing	R
2245	Protecting the Elderly and Vulnerable from Fraud	R
2270	Safe Deposit Boxes	MO
2271	Biometric Safe Deposit Boxes	MO
2280	Share Insurance	R
2290	Wire Transfers	MO
2300	Share Draft Accounts	MO
2310	Share Draft Telephone Inquiries	R
2400	Funds Availability	CM
2401	Collection of Checks Procedure	O
2500	Truth-in-Savings (<i>NCUA 707 – Dividend Policy</i>)	MP
2600	Electronic Fund Transfers (<i>12 CFR 1005</i>)	CM
2605	International Remittance Transfers (<i>12 CFR 1005.33</i>)	CM/R**
2610	ACH Operations (<i>NACHA Rules</i>)	MO
2611	ACH Management (<i>NACHA Rules</i>)	MO
2612	ACH Audit (<i>NACHA Rules</i>)	MO
2615	ATM/Debit Cards	MO
2620	Remote Deposit Capture (<i>NCUA Letter to Federally Insured Credit Unions 09-CU-01</i>)	MO
2700	Garnishment of Federal Benefit Payments	R
2705	IRS Levies	R

** Policy 2605 - International Remittance Transfers is mandatory if your credit union handles 100 or more IRTs in a year. It is recommended if you process less than 100 a year in the event that your activity increased and you had to implement in the middle of the year.

Section	Policy Title	KEY
3000	ACCOUNTING	MP
3105	Accounts Payable	MP
3110	Operating Charge Offs	MP
3115	Credit Union Owned Credit Cards	MO
3125	Financial Institution Reconciliations	MP
3130	Fixed Assets	MP
3135	Interest Income	MP
3145	Payroll	R
3155	Travel Reimbursement (<i>Letter to Federal Credit Unions 05-FCU-02</i>)	R MP for FCUs
3160	Unclaimed Property	MP
3165	Loan Workouts and Nonaccrual Standards (<i>NCUA 741 Appendix C</i>)	MP
3170	Troubled Debt Restructure (<i>NCUA 741 Appendix C</i>)	MO

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Section	Policy Title	KEY
4000	SECURITY	MP
4100	General Security Procedures (<i>NCUA 748</i>)	MP
4110	Burglary Procedures (<i>NCUA 748</i>)	MP
4120	Information Security (<i>NCUA 748</i>)	MP
4125	Incident Response (<i>NCUA 748</i>)	MP
4130	Kidnap / Hostage / Extortion	R
4140	Robbery Procedures (<i>NCUA 748</i>)	MP
4150	Workplace Violence	R
4160	Bomb Threats	R
4200	Security Devices	R
4300	Computer Security & Control (<i>NCUA 748</i>)	MP
4305	Configuration Management	R
4310	Patch Management	MO
4315	Firewalls	R
4320	Computer Hardware/Software Acquisition	R
4340	Remote Access	R
4350	Cloud Computing (<i>FFIEC Statement on Outsourced Cloud Computing</i>)	MO

Section	Policy Title	KEY
5000	ASSET/LIABILITY MANAGEMENT	MP
5100	General Asset/Liability Management Policy (<i>NCUA Letter to Credit Unions 00-CU-10</i>)	MP
5110	ALCO Key Objectives (<i>NCUA 703.3</i>)	MP
5120	Budgeted Asset/Liability Structure (<i>NCUA Letter to Credit Unions 00-CU-10</i>)	MP
5200	Liquidity Risk Management (<i>NCUA 703.3</i>)	MP
5205	Small Asset Liquidity Risk Management (<i>NCUA 703.3</i>)	MP
5300	Interest Rate Risk Management (<i>NCUA 741, Letter to Credit Unions 12-CU-11</i>)	MP (over \$50 m) R (under \$50 m)
5400	Capital Management (<i>NCUA 702.503</i>)	MP
5500	Ownership of Fixed Assets (<i>NCUA 701.36</i>)	MP

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Section	Policy Title	KEY
6000	INVESTMENTS	MP
6100	General Investment Policy (<i>NCUA 703.3</i>)	MP
6105	ASC 320 Compliance (<i>NCUA 703.3</i>)	MP
6110	Broker-Dealer Relations (<i>NCUA 703.3</i>)	MP
6115	Concentration Risk (<i>NCUA 703.3 & Letter to Credit Unions 10-CU-03</i>)	MP
6120	Investment Accounting	MP
6130	Investment Controls and Monitoring (<i>NCUA 703.3</i>)	MP
6150	Safekeeping of Investments (<i>NCUA 703.3</i>)	MP
6200	Investment Portfolio (<i>NCUA 703.3</i>)	MP
6210	Authorized Investments (<i>NCUA 703.3</i>)	MP
6215	Derivative Investments (<i>NCUA 703.106</i>)	MO for FCUs
6220	Non-Deposit Investments Products (<i>NCUA Letter to Federal Credit Unions 10-FCU-03</i>)	MO for FCUs

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*** Special Note for Policies within the Lending Section**

The Federal Credit Union Act and NCUA Rules require the board of directors of each Federal Credit Union to establish written policies for loans and lines of credit, including credit cards. The policies must be consistent with the relevant provisions of the Federal Credit Union Act, NCUA’s regulations, and all other applicable laws and regulations (e.g., Truth-in-Lending Act, Regulation B, etc.). While credit unions are not required to offer all of the loans and services discussed in this section, if any are offered, there must be a corresponding written policy. With the exception of member business loans, the regulations do not discuss what must be contained within a particular policy. Furthermore, while many of the sections do not require a written policy *per se*, they contain information, which is mandatory for compliance purposes. Therefore, in order to comply with the numerous applicable rules and regulations, it is recommended that written policies be adopted for all of the topics covered in this section, unless a particular product is not offered.

Section	Policy Title	KEY
7000	LENDING	MP
7100	General Lending Policy	*
7101	Loans	*
7102	Performance Ratios	*
7105	Collateral	*
7110	Loan Concentrations	*
7115	Credit Underwriting Standards	*
7120	Fair Lending (NCUA 701.21 <i>good faith error defense</i>)	*
7125	Loan Application	*
7130	Loan Authorization	*
7135	Loan Documentation	*
7140	Loan Insurance	*
7145	Loan Limits	*
7150	Loan Portfolio Mix	*
7155	Loan Quality Board Reports	*
7160	Loans to Insiders	*
7165	Pricing and Terms	*
7170	Risk-Based Lending	*
7175	Anti-Steering in Lending Practices	R
7180	Anti-Predatory Lending	R

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Section	Policy Title	KEY
7000	LENDING (continued)	MP
7200	Consumer Loans	*
7205	Automobile Loans	*
7206	Lease-Like Loans	*
7210	Credit Cards	*
7213	Military Personnel Loans	*
7215	Overdraft Protection (Courtesy Pay) (<i>NCUA 701.21 & 12 CFR 1005.17</i>)	MO
7217	Payday Lending (<i>NCUA 701.21</i>)	MO
7218	Payday Alternative Loans (PALs) (<i>NCUA 701.21</i>)	MO
7220	Rapid Refund Loans	*
7225	Recreational Vehicle Loans	*
7230	Share Secured Loans	*
7235	Stock Secured Loans	*
7240	Student Loans	*
7244	Integrated Mortgage Disclosures	CM
7245	Truth-in-Lending Disclosures for Closed-End Credit	*
7250	Truth-in-Lending Disclosures for Open-Ended Credit	*
7251	Regulation Z – Home Equity Plans	*
7255	Personal Loans	*
7260	Multi-Featured Loan Programs	*
7270	Skip Payment Program	*
7301	Registration of Mortgage Loan Originators (S.A.F.E. Act) (<i>NCUA 761</i>)	MO
7302	Real Estate Appraisals (<i>FFIEC Interagency Appraisal and Evaluation Guidelines</i>)	MO
7303	Real Estate Appraisals – Appendices (<i>FFIEC Interagency Appraisal and Evaluation Guidelines</i>)	MO
7305	Environmental Risk Management	*
7310	Construction Loans	*
7315	Commercial Real Estate Loan Workouts	*
7320	Home Equity Loans	*
7330	Residential Real Estate Loans	*
7331	Non-Traditional Residential Real Estate Loans	*
7332	Loan Originator Compensation	*
7335	Loans Secured by Unimproved Property	*
7350	Ability to Repay (<i>12 CFR 1026 Appendix Q</i>)	MO
Section	Policy Title	Key
7000	LENDING (Continued)	
7351	Small Creditor Ability to Repay (<i>12 CFR 1026 Appendix Q</i>)	MO

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7360	Mortgaging Servicing Rules (<i>12 CFR 1024</i>)	MO
7361	Small Servicer Mortgaging Servicing Rules	R
7370	HOEPA Rule Requirement	MO
7410	Indirect Dealer Financing (<i>NCUA Letter to Credit Unions 10-CU-15</i>)	MO
7415	Sub-Prime Auto Indirect Auto Lending Policy (<i>NCUA Letter to Credit Unions 10-CU-15</i>)	MO
7420	Member Business Loans (<i>NCUA 723</i>)	MO
7425	Member Business Credit Cards	*
7430	Participation Loans (<i>NCUA 701.22</i>)	MO
7510	Collection Process (<i>NCUA 701.39</i>)	MP
7520	Collection Staff Members and Responsibilities	*
7600	Loan Review and Classification	*
7615	Allowance for Loan and Lease Losses (<i>NCUA Letter to Credit Unions 03-CU-06</i>)	MP
7616	Loan Extensions	*
7620	Loan Charge-Offs (<i>NCUA Letter to Credit Unions 03-CU-01</i>)	MP
7625	Residential Real Estate Loss Mitigation Strategies	*
7630	Multi-Dimensional Loan Portfolio Analysis	*

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Section	Policy Title	KEY
8000	OTHER REAL ESTATE OWNED (OREO)	
8100	General OREO Policy (<i>NCUA Letter to Credit Unions 08-CU-25</i>)	MP
8110	Accounting Treatment of OREO (<i>GAAP</i>)	MO
8120	Eviction of OREO Inhabitants	MO
8130	Resale of OREO	MO

Section	Policy Title	KEY
9000	FEDERAL REGULATIONS	CM
9110	Equal Credit Opportunity Act – Regulation B	CM
9120	Fair Debt Collection Practices Act	CM
9130	Holder in Due Course Rule	CM
9150	Unfair, Deceptive, or Abusive Acts or Practices	CM
9200	Home Mortgage Disclosure Act – Regulation C	CM
9210	Real Estate Settlement Procedures Act - HUD Regulation X	CM
9220	Home Ownership and Equity Protection Act	CM
9300	Bank Bribery Act	CM
9400	Equal Employment Opportunity Act	CM
9420	Monetary Control Act - Regulation D	CM
9500	Americans with Disabilities Act	CM
9600	Junk Fax Prevention Act	CM

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Section	Policy Title	KEY
10000	RECORDS RETENTION	MP
10001	Table 1 – Corporate Records	R
10002	Table 2 – Collection & Delinquency Records	R
10003	Table 3 – Data Processing Records	R
10004	Table 4 – Electronic Funds Transfer Records	R
10005	Table 5 – General Accounting Records	R
10006	Table 6 – Insurance & Bond Records	R
10007	Table 7 – Lending Records	R
10008	Table 8 – Negotiable Instruments Records	R
10009	Table 9 – Personnel & Employment Records	R
10010	Table 10 – Security Records	R
10011	Table 11 – Member Account Records	R
10012	Table 12 – Tax Records	R
10100	Records Retention (<i>NCUA 749 Appendix A</i>)	MP

Section	Policy Title	KEY
11000	FAIR CREDIT REPORTING ACT (FCRA)	MP
11001	Fair Credit Reporting Act (<i>NCUA 717</i>)	MP
11002	Furnishing Information to Credit Reporting Agencies (<i>NCUA 717.42</i>)	MP
11003	Accuracy and Integrity of Information Reported (<i>NCUA 717.42</i>)	MP
11004	Pre-Screened Offers of Credit Or Insurance (<i>NCUA 717.42</i>)	MP
11005	FCRA Adverse Action Requirements (<i>12 CFR 1002.09</i>)	MP
11006	Receipt of Notice of Dispute of Accuracy Information (<i>NCUA 717 Appendix E</i>)	MP
11009	Identity Theft Red Flag Guidelines (<i>NCUA 717.82 & 717.91</i>)	MP
11010	Risk Based Pricing (<i>NCUA Letter to Credit Unions 99-CU-05</i>)	MP
11012	Disclosure of Information to Victims of Identify Theft	R
11015	Obtaining and Using Medical Information	R
11016	Affiliate Marketing Rules	MO