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# CU PolicyPro

## Policy Guidance

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May 2025

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**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 federal regulatory requirements. 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, state-specific laws, and the applicability of the policies contained in this manual.

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Section	Policy Title	KEY
<b>1000</b>	<b>ADMINISTRATIVE</b>	
1100	Credit Union Culture and Governance	O
1100.10	Organization	R
1100.11	Field of Membership	R
1100.12	Board of Director's Duties	R
1100.13	Compensation, Reimbursement, and Indemnification	R
1100.14	Bond and Insurance Coverage	R
1100.15	Education and Volunteer Training Guidelines ( <i>NCUA Part 701</i> )	R
1100.16	Strategic Planning	R
1100.17	Audits	R
1100.18	Legal Counsel	O
1100.19	Code of Ethics and Diversity ( <i>NCUA 701 Appendix A, Article VI</i> )	CM
1230	Regulatory Compliance	CM
1230.10	Complaint Policy for Federally Chartered Credit Unions	R for FCUs
1230.11	Complaint Policy for State-Chartered Credit Unions	R for SCUs
1240	Enterprise Risk Management	R
1500	Staffing and Human Resources	O
1500.10	Whistleblowing Protection Policy	R
1500.11	Nepotism	O
1500.12	Equal Opportunity Statement ( <i>12 CFR 1002</i> )	CM
1500.13	Political Contributions	O
1500.14	Payroll	
1516	COVID-19 Vaccination, Testing and Face Covering Policy ( <i>OSHA's emergency temporary standard (ETS)</i> )	MP**
1520	Succession Planning ( <i>NCUA Examiners Guide</i> )	CM
1520.10	Succession Planning	R
1520.20	Associate Board Member	R
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
1615	Privacy and Confidential Information ( <i>12 CFR 1016</i> )	MP
1620	Conflict of Interest ( <i>NCUA 701 Appendix A, Article VI</i> )	CM
1645	Fraud ( <i>Internal Controls – NCUA Examiners Guide</i> )	MP

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<b>Section</b>	<b>Policy Title</b>	<b>KEY</b>
<b>2000</b>	<b>OPERATIONS</b>	
2110	Bank Secrecy Act/Anti-Money Laundering Program ( <i>NCUA 748.2</i> )	MP
2110.10	Politically Exposed Persons	R
2110.20	Beneficial Ownership Information Access Procedures	R
2111	Hemp-Related Accounts	R
2112	Bank Secrecy Act: Servicing Marijuana-Related Accounts ( <i>FIN-2014-G001</i> )	MO
2113	Bank Secrecy Act: Not Servicing Marijuana-Related Accounts	R
2118	Community Reinvestment Act	CM
2120	Cash ( <i>NCUA Examiners Guide</i> )	MP
2125	Balancing ( <i>NCUA Examiners Guide</i> )	MP
2130	Dual Control ( <i>NCUA Examiners Guide</i> )	MP
2140	Purchasing ( <i>NCUA Guidance</i> )	MP
2145	Office of Foreign Assets Control	MP
2150	Signing Authority ( <i>FCU Bylaws</i> )	MP
2185	Third Party Vendor Due Diligence and Oversight ( <i>NCUA Letter 07-CU-13</i> )	MP
2190	Business Continuity Program Policy ( <i>NCUA Letter to Credit Unions 08-CU-01, 01-CU-21 and 06-CU-06, NCUA Part 748</i> )	MP
2191	Chain of Command ( <i>NCUA Letter to Credit Unions 08-CU-01</i> )	MP
2191.10	Disaster Management Team List	
2192	Emergency Powers ( <i>NCUA Letter to Credit Unions 08-CU-01</i> )	MP
2195	Pandemic Preparedness and Response ( <i>NCUA Letter to Credit Unions 08-CU-01, 01-CU-21 and 06-CU-06</i> )	MP
2196	Telecommuting	R
2200	Member Services	R
2205	Unlawful Internet Gambling ( <i>NCUA Regulatory Alert 10-RA-08</i> )	MP
2210	Accounts ( <i>NCUA 707</i> )	CM
2210.10	Trust Accounts	R
2210.11	Individual Retirement Arrangements	MO
2210.12	Disaster/Tragedy Related Account	R
2210.13	Fresh Start Checking Account	R
2210.14	Health Savings Accounts	R
2210.15	Deceased Member Issues and Estate Accounts	R
2210.16	Dormant Accounts	R
2210.17	Checking Accounts	MO
2210.18	Prepaid Accounts	R
2210.19	Safe Deposit Boxes	MO
2210.20	Biometric Safe Deposit Boxes	MO
2210.21	Share Insurance	R
2210.22	Telephone Inquiries	R

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2210.23	Garnishment of Federal Benefit Payments	R
2210.24	IRS Levies	R
2211	Business Accounts ( <i>NCUA Examiner's Guide</i> )	MO
2220	E-Commerce ( <i>Letter to Credit Union 02-CU-17</i> )	MO
2220.10	Website	R
2222	Electronic Communications: Acceptable Use ( <i>Letter to Credit Union 02-CU-17</i> )	MO
2223	Children's Online Privacy Protection Act (16 CFR 312)	MO
2225	Digital Banking ( <i>NCUA Letter to Credit Unions</i> )	MO
2225.10	Anti-Phishing	R
2225.11	Digital Assets ( <i>NCUA Letter 21-CU-16</i> )	R
2227	Electronic Signatures	MO
2227.10	E-Statements	CMO
2232	Membership Expulsion and/or Service Limitation	MO
2245	Elder and/or Vulnerable Adult Protections	R
2245.10	Trusted Contact Model Procedures	O
2245.11	Trusted Contact Model Script	O
2250	Providing Products and Services to Limited English Proficiency Members	O
2290	Wire Transfers	MO
2400	Funds Availability	CM
2400.10	Collection of Checks Procedure	O
2500	Truth-in-Savings ( <i>NCUA 707</i> )	MP
2605	International Remittance Transfers ( <i>12 CFR 1005.33</i> )	CM/R***
2611	ACH Operations and Management ( <i>NACHA Rules</i> )	MO
2612	ACH Audit ( <i>NACHA Rules</i> )	MO
2615	ATM or Debit Cards ( <i>NCUA Examiner's Guide</i> )	MO
2615.10	Electronic Fund Transfers ( <i>12 CFR 1005</i> )	CM
2615.11	Real-Time Payment Options – Risk and Controls	R
2620	Remote Deposit Capture ( <i>FFIEC Risk Management of Remote Deposit Capture</i> )	MO

\*\* Policy 1516 – COVID-19 Vaccination, Testing and Face Covering Policy is mandatory if your credit union has more than 100 employees *and* is pending results/effectiveness after the current stay in place on OSHA's ETS mandate.

\*\*\* Policy 2605 – International Remittance Transfers is mandatory if your credit union handles 500 or more IRTs in a year. It is recommended if you process less than 500 a year in the event that your activity increased and you had to implement in the middle of the year.

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Section	Policy Title	KEY
<b>3000</b>	<b>ACCOUNTING</b>	<b>MP</b>
3105	Accounts Payable ( <i>NCUA Examiner's Guide</i> )	MP
3115	Credit Union-Owned Credit Cards ( <i>NCUA Examiner's Guide</i> )	MO
3125	Financial Institution Reconciliations ( <i>NCUA Interagency Guidance Regarding Deposit Reconciliation Practices</i> )	MP
3145	Payroll	R
3155	Travel Reimbursement ( <i>Letter to Federal Credit Unions 05-FCU-02</i> )	R MP for FCUs
3160	Unclaimed Property ( <i>Reference State Law</i> )	MP
3165	Loan Workouts, Modifications, and Nonaccrual Standards	MP
3170	Troubled Debt Restructure ( <i>NCUA 741 Appendix B</i> )	MO

Section	Policy Title	KEY
<b>4000</b>	<b>SECURITY</b>	<b>MP</b>
4100	General Security Procedures ( <i>NCUA 748</i> )	MP
4110	Burglary ( <i>NCUA 748</i> )	MP
4120	Information Security ( <i>NCUA 748</i> )	MP
4125	Incident Response ( <i>NCUA 748</i> )	MP
4125.10	Corporate Account Takeover Procedures	R
4130	Kidnapping, Hostage Situation, or 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 and Control ( <i>NCUA 748</i> )	MP
4305	Configuration Management	R
4310	Patch Management	MO
4315	Firewalls	R
4320	Computer Hardware and Software Acquisition	R
4340	Remote Access	R
4350	Cloud Computing ( <i>FFIEC Statement on Outsourced Cloud Computing</i> )	MO
4400	Change Management Procedures	R

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Section	Policy Title	KEY
<b>5000</b>	<b>ASSET/LIABILITY MANAGEMENT</b>	<b>MP</b>
5100	General Asset/Liability Management ( <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 (under \$500 m)
5401	Capital Management for Complex Credit Unions	MP (over \$500 m)
5500	Ownership of Fixed Assets ( <i>NCUA 701.36</i> )	MP

Section	Policy Title	KEY
<b>6000</b>	<b>INVESTMENTS</b>	<b>MP</b>
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 &amp; 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 Transactions ( <i>NCUA 703.106</i> )	MO for FCUs
6220	Non-Deposit Investment Products ( <i>NCUA Letter to Federal Credit Unions 10-FCU-03</i> )	MO for FCUs
6300	Charitable Donation Accounts	R
6400	Subordinated Debt Policy ( <i>NCUA 701.25 and 702.48</i> )	MO
6400.10	Subordinated Debt Procedure	MO

## CU PolicyPro Operations Manual: Policy Guidance

**\* 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
<b>7000</b>	<b>LENDING</b>	<b>MP</b>
7100	General Lending Policy	*
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 Add On Products	*
7145	Loan Limits	*
7150	Loan Portfolio Mix	*
7160	Loans to Insiders	*
7165	Pricing and Terms	*
7170	Risk-Based Lending	*
7175	Anti-Steering in Lending Practices	R
7180	Anti-Predatory Lending Policy	R
7200	Consumer Loans	*
7205	Automobile Loans	*
7206	Lease-Like Loans	*
7210	Credit Cards	*
7210.10	Credit Card Program Procedures	*
7213	Military Personnel Loans	*
7215	Overdraft Protection (NCUA 701.21 & 12 CFR 1005.17)	MO
7218	Payday Alternative Loans (NCUA 701.21)	MO
7220	Rapid Refund Loans	*
7225	Recreational Vehicle Loans	*
7230	Share Secured Loans	*



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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 ( <i>NCUA 761</i> )	MO
7302	Real Estate Appraisals ( <i>FFIEC Interagency Appraisal and Evaluation Guidelines</i> )	MO
7302.10	Reconsideration of Value Procedures	R
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 and Modifications	*
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
7351	Small Creditor Ability to Repay ( <i>12 CFR 1026 Appendix Q</i> )	MO
7360	Mortgage Servicing Rules ( <i>12 CFR 1024</i> )	MO
7361	Small Servicer Mortgage 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 and Commercial Lending ( <i>NCUA 723</i> )	MO
7425	Member Business Credit Cards	*
7430	Participation Loans ( <i>NCUA 701.22</i> )	MO
7435	Small Business Administration Loans	R
7436	CARES Act: Small Business Administration Loans	R
7437	Main Street Lending	R
7450	BSA: Marijuana-Related Business Lending	MO
7510	Collection Process ( <i>NCUA 701.39</i> )	MP
7520	Collection Staff Members and Responsibilities	*
7600	Loan Review and Classification	*

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7615	Allowance for Loan and Lease Losses ( <i>NCUA Letter to Credit Unions 03-CU-06</i> )	MP
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	*
7700	Loan Review and Classification (CECL)	MP (on 1/1/23)
7715	Allowance for Credit Losses	MP (on 1/1/23)
7715.10	Allowance for Credit Losses Methodology	MP (on 1/1/23)

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Section	Policy Title	KEY
<b>8000</b>	<b>OTHER REAL ESTATE OWNED (OREO)</b>	
8100	General OREO Policy ( <i>NCUA Letter to Credit Unions 03-CU-01</i> )	<b>MP</b>
8110	Accounting Treatment of OREO ( <i>NCUA Letter 08-CU-25</i> )	<b>MO</b>
8120	Eviction of OREO Inhabitants	<b>MO</b>
8130	Resale of OREO	<b>MO</b>

Section	Policy Title	KEY
<b>9000</b>	<b>FEDERAL REGULATIONS</b>	<b>CM</b>
9120	Fair Debt Collection Practices Act ( <i>12 CFR 1006</i> )	CM
9130	Holder in Due Course Rule	CM
9150	Unfair, Deceptive, or Abusive Acts or Practices	R
9200	Regulation C: Home Mortgage Disclosure Act ( <i>12 CFR 1003</i> )	CM
9210	HUD Regulation X: Real Estate Settlement Procedures Act ( <i>12 CFR 1024</i> )	CM
9220	Home Ownership and Equity Protection Act ( <i>12 CFR 1026.32</i> )	CM
9400	Equal Employment Opportunity Act ( <i>29 CFR 1614</i> )	CM
9420	Regulation D: Monetary Control Act ( <i>12 CFR 204</i> )	CM
9500	Americans with Disabilities Act	CM
9600	TCPA, JFPA and CAN-SPAM	CM
9600.10	TCPA Procedures	R

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

Section	Policy Title	KEY
<b>11000</b>	<b>FAIR CREDIT REPORTING ACT</b>	<b>MP</b>
11001	Fair Credit Reporting Act ( <i>NCUA 717</i> )	MP
11003	Accuracy and Integrity of Information Reported ( <i>NCUA 717 Appendix E</i> )	MP
11004	Pre-Screened Offers of Credit or Insurance ( <i>NCUA 717 Appendix E</i> )	MP
11005	Fair Credit Reporting Act: Adverse Action Requirements ( <i>15 USC 1681m</i> )	MP
11009	Identity Theft Red Flag Guidelines ( <i>NCUA 717.82 &amp; 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