**Summary of Content Changes
2022.2 Update – June 2022**

**General Notes**

With the recent technical enhancement to CU PolicyPro to allow for a third level of content, credit unions are able to add resources and procedures under an overarching policy. As a result, we are evaluating all our existing “policies” and determining if there is a mandatory requirement to maintain the policy and/or if the content is better suited for a procedure or resource. In this update, we have started our transition of content with the **1000: Administrative Chapter**. Many of the changes within this update are associated with moving content from the policy list to a third level of content, underneath the supporting policy as a corresponding procedure/resource. All the same functionality with the third level of content exists, including publishing, key fields, etc.

From a content perspective, there was **one new policy added** for credit unions exploring marijuana-related business lending (Policy 7450, *Bank Secrecy Act – Marijuana-Related Business Lending*). There were also some minor changes made to the *Succession Planning* Policy (1520) based on the [proposed rule](https://www.ncua.gov/files/agenda-items/succession-planning-proposed-rule-20220127.pdf) by the NCUA. Although this rule isn’t final yet, the policy needed an update. We anticipate that there may be additional changes when the final rule is released, but this version will be closer to what is required by the NCUA. Policy 7120 – *Fair Lending* was also updated with minor changes in light of the [CFPB’s advisory opinion](https://files.consumerfinance.gov/f/documents/cfpb_revoking-terms-of-existing-credit-arrangement_advisory-opinion_2022-05.pdf) on the impact of the Equal Credit Opportunity Act through the lending process, including after credit has been extended.

Several policies had redundant information already found in another policy. The content of these policies was consolidated with other policies as needed, then was archived and removed from CU PolicyPro. A listing of the archived policies can be found after the *Content Update Summary* below. Again, in an effort to make our content more concise and easier to access, we feel this will be another necessary change as we make progress in separating out our content.

**Content Update Summary**

**Policy 1100 – Credit Union Culture and Governance \*\*POLICY NAME CHANGE\*\***

**2022-2**

This policy was updated to include information related to the Credit Union’s corporate governance and includes several additional related procedures and resources beneath it. **(Recommended)**

**1100.10 – Organization** **NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1200\*\***
**2022-2**
What was previously Policy 1200 has been renumbered to 1100.10. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

 **1100.11 – Field of Membership** **NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1150\*\*
2022-2**

What was previously Policy 1150 has been renumbered to 1100.11. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.12 – Board of Director’s Duties NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1205\*\*
2022-2**

What was previously Policy 1205 has been renumbered to 1100.12. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.13- Compensation, Reimbursement, and Indemnification NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1210\*\*
2022-2**

What was previously Policy 1210 has been renumbered to 1100.13. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.14 – Bond and Insurance Coverage NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1220\*\*
2022-2**

What was previously policy 1220 has been renumbered to 1100.14. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.15 – Education and Volunteer Training Guidelines NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1235\*\*
2022-2**

What was previously policy 1235 has been renumbered to 1100.15. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.16 – Strategic Planning NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1160\*\*
2022-2**

What was previously policy 1160 has been renumbered to 1100.16. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.17 – Audits** **NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1300\*\***
**2022-2**

What was previously policy 1300 has been renumbered to 1100.17. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.18 – Legal Counsel** **NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1400\*\*
2022-2**

What was previously policy 1400 has been renumbered to 1100.18. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1100.19 – Code of Ethics and Diversity** **NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1600\*\*
2022-2**

What was previously policy 1600 has been renumbered to 1100.19. This is not required content so it will be used to support the credit union’s *Credit Union Culture and Governance* policy. **(Recommended)**

**1230.10 – Complaint Process for Federally-Chartered Credit Unions NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1540\*\*
2022-2**

What was previously policy 1540 has been renumbered to 1230.10. This is not required content so it will be used to support the credit union’s *Regulatory Compliance* policy. **(Recommended)**

**1230.11 – Complaint Process for State-Chartered Credit Unions NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1541\*\*
2022-2**

What was previously policy 1541 has been renumbered to 1230.11. This is not required content so it will be used to support the credit union’s *Regulatory Compliance* policy. **(Recommended)**

**Policy 1240 – Enterprise Risk Management
2022-2**

Policy 1240 was reviewed with only minor changes to address the Supervisory Committee in addition to the Audit Committee. **(Recommended)**

**Policy 1500 – Staffing and Human Resources** **\*\*POLICY NAME CHANGE\*\*
2022-2**

This policy was updated to include and be a header for policies and processes related to staffing and/or human resources, which are closely related to operations. **(Recommended)**

**1500.10 – Whistleblowing Protection NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1505\*\*
2022-2**

What was previously policy 1505 has been renumbered to 1500.10. This is not required content so it will be used to support the credit union’s *Staffing and Human Resources* policy. **(Recommended)**

**1500.11 – Nepotism NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1510\*\*
2022-2**

What was previously policy 1510 has been renumbered to 1500.11. This is not required content so it will be used to support the credit union’s *Staffing and Human Resources* policy. **(Recommended)**

**1500.12 – Equal Opportunity Statement NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1170\*\*
2022-2**

What was previously policy 1170 has been renumbered to 1500.12. This is not required content so it will be used to support the credit union’s *Staffing and Human Resources* policy. **(Recommended)**

**1500.13 – Political Contributions NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1680\*\*
2022-2**

What was previously policy 1680 has been renumbered to 1500.13. This is not required content so it will be used to support the credit union’s *Staffing and Human Resources* policy. **(Recommended)**

**Policy 1520 – Succession Planning**
**2022-2**

This policy was revised based on the [proposed rule](https://www.ncua.gov/files/agenda-items/succession-planning-proposed-rule-20220127.pdf) by the NCUA. While there will likely be additional changes to consider when a final rule is issued, the proposed rule was used as a framework to update the existing policy in the interim. **(Recommended)**

**Policy 1615 – Privacy and Confidential Information \*\*POLICY NAME CHANGE\*\*
2022-2**

This policy is being updated to include the content of Policy 1610 – *Confidential Information*, which addresses the Credit Union’s commitment to safeguarding confidential and proprietary business information (in addition to non-public member information). **(Recommended)**

 **2225.10 – Anti-Phishing** **NEW SECTION NUMBER \*\*PREVIOUSLY NUMBERED AS 1616\*\*
2022-2**

What was previously policy 1616 has been renumbered to 2225.10 and has been changed to be a resource under the *Digital Banking* Policy. This is not required content, but a document outlining the proper mitigation techniques to prevent fraud through phishing, so it will be used to build the credit union’s Digital Banking resources and protocol. **(Recommended)**

 **Policy 2250 – Providing Products and Services to Limited English Proficiency Members \*\*New Policy Number\*\* PREVIOUSLY NUMBERED AS 1700
2022-2**

What was previously policy 1700 has been renumbered to 2250. As we continue to reorganize and create corresponding model procedures and resources, it was determined that this policy was better suited under the Operations Chapter. No additional changes were made. **(Recommended)**

**Policy 2611 – ACH Operations and Management** **\*\*POLICY NAME CHANGE\*\*
2022-2**

This policy was revised to combine the *ACH Operations* (Policy 2610) and *ACH Management* (Policy 2611) and additional minor changes were made. The changes were so extensive that a redlined version is not available. We recommend adopting this current version in its entirety, then re-customizing if needed. **(Required)**

 **Policy 7120 – Fair Lending
2022-2**

This policy was reviewed in light of the [CFPB’s advisory opinion](https://files.consumerfinance.gov/f/documents/cfpb_revoking-terms-of-existing-credit-arrangement_advisory-opinion_2022-05.pdf) on the impact of the Equal Credit Opportunity Act through the lending process, including after credit has been extended. Minor revisions were made to clearly acknowledge the credit union’s compliance. In addition, content within Policy 9110 – *Regulation B – Equal Credit Opportunity Act* was included. **(Recommended)**

**Policy 7351 – Small Creditor Ability to Repay
2022-2**

This policy was revised to include the option for small creditors who are originating **first lien** higher-priced mortgage loans to take advantage of the seasoned qualified mortgage option. **(Recommended)**

**Policy 7450 – Bank Secrecy Act – Marijuana-Related Business Lending
2022-2**

This policy was crafted to assist credit unions who are considering marijuana-related business lending. This policy should be used in conjunction with Policy 2112 – *Bank Secrecy Act: Servicing Marijuana Related Accounts*, which outlines the associated Bank Secrecy Act requirements. **(Required if Offered)**

**Archived Policies Summary**

These policies have been removed from the Model Content of CU PolicyPro.

**1515 – Families First Coronavirus Response Act \*\* ARCHIVED\*\***The Families First Coronavirus Response Act (FFCRA) expired on December 31, 2020. However, the American Rescue Plan Act of 2021 extended the availability of the FFCRA payroll tax credits for certain wages paid by covered employers for voluntarily-provided qualifying FFCRA leave. The ending of the 2022 tax period allows this policy to be archived. This policy can officially be retired from the Credit Union’s manual. It should be referenced if examiners are asking for the credit union’s policies/procedures related to COVID. **(Recommended)**

**Policy 1610– Confidential Information** **\*\* ARCHIVED\*\***
The content of this policy is included in Policy 1615 – *Privacy*. **(Recommended)

Policy 1640 – Credit Union Assets** **\*\*ARCHIVED\*\***This policy is being retired as the content is contained within Policy 1645 - *Fraud*. **(Recommended)

Policy 1685 – Software Licensing** **\*\*ARCHIVED\*\***
This policy is being retired as the content is contained within Policies 4320 – *Computer Hardware and Software Application*, 4120 – *Information Security*, 4400 – *Change Management Procedures* and 4300 – *Computer Security and Control*. **(Recommended)

Policy 2610 – ACH Operations \*\*ARCHIVE\*\***
This policy was being archived since the content has been included within Policy 2611, which has been renamed *ACH Operations and Management*. **(Required)**

 **Policy 9110 – Regulation B – Equal Credit Opportunity Act \*\*ARCHIVED\*\***This policy is being retired. The content within this policy was also included in Policy 7120 – *Fair Lending*. **(Recommended)**

**Policies Reviewed – No Changes Needed**

The following policies were reviewed and are up to date, but no changes were needed. Because there are no changes, no redlined documents are needed. This is informational only.

* 1530 – *Employee Use of Social Media*
* 1531 – *Credit Union Use of Social Media*
* 1620 – *Conflict of Interest*
* 1645 - *Fraud*