

# INFO SIGHT 360



## Small Credit Union Resources

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CEO of League InfoSight  
CEO of CU Risk Intelligence



# »»» Agenda

- Tone at the top
- Small credit union benefits
- Juggling priorities
- Taking advantage of resources
- Succession Planning
- Other resources available
- Questions!

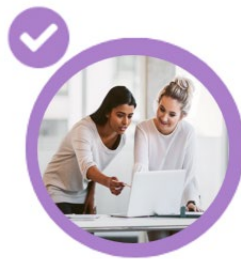


# INFOSIGHT360

## Tone at the top



InfoSight



CU PolicyPro



RecoveryPro

# »»» Tone at the top!

- Whether you are large or small, the importance of setting the “tone at the top” for compliance and risk is critical.
- Leadership must actively **support and understand compliance efforts** to set the appropriate culture.
  - Devote adequate resources
  - Independent testing
- **Empower staff and the Board to research topics** and have information at their fingertips.
  - There is no limit on the number of users you can have in InfoSight360.
  - Customize access so people only see what they need to see.
- Stay informed on what’s happening.
- Ensure required compliance training is completed.

# >>> Tone at the top!

- Weekly curated news articles.
- List of **required compliance training** for staff and volunteers.
- Specific channel devoted to **Board Responsibilities**.

The screenshot displays the InfoSight360 website for LeDu Test Credit Union. The top navigation bar includes links for Home, My 360 View, InfoSight (selected), CU PolicyPro, RecoveryPro, Resources, CU Documents, Discussion Board, and Admin. A secondary navigation bar contains links for InfoSight360 Education, Compliance Help, and Support. The main content area is titled 'Board Responsibilities' and features a search bar and a list of topics. The 'Board Responsibilities' link in the left sidebar is highlighted with a red box. A 'News & Announcements' tab is also highlighted with a red box. Three news articles are visible: 'Executive Order Looks to Ease Mortgage Lending Regulatory Requirements', 'InfoSight360 to Offer Required Loan Originator Training', and 'NCUA Proposes Overhaul of Part 749 in Newest Deregulation Proposal'. A fourth article, 'NCUA Announces Sixth Round of Deregulation Proposals', is partially visible. At the bottom, a 'Required Compliance Training' section is highlighted with a red box, containing a brief description and a link to a list of training resources. The InfoSight360 logo is in the bottom right corner.

INFO SIGHT 360 | LeDu Test Credit Union

InfoSight360 Education Compliance Help Support

Home My 360 View InfoSight CU PolicyPro RecoveryPro Resources CU Documents Discussion Board Admin

InfoSight > Compliance Topics > Board Responsibilities

Search InfoSight

Accounts

ACH/Electronic Payments

Advertising

Bank Secrecy Act

Bankruptcy and Collections

**Board Responsibilities**

Employment

Field of Membership

Fraud

Investment

Loans and Leasing

Record Retention

Security

Tax Issues

Massachusetts Change

Bank Bribery Act

Board Meeting Agenda and Minutes

Board of Director Liability

Board of Directors Responsibility Quiz

Board Structure and Officer Duties

Business Continuity Planning - Board Responsibilities

Complaint Management

Director Responsibilities

Directorship Policy and Job Descriptions

Financial Literacy Requirements

Property Casualty Insurance

Small Credit Unions

Strategic Planning

News & Announcements

See All

**Eases Mortgage Lending Regulatory Requirements**

**EXECUTIVE ORDER**

INFO SIGHT 360

Executive Order Looks to Ease Mortgage Lending Regulatory Requirements

04/01/2026

On March 13th, President Trump issued an Executive Order titled "Promoting Access to Mortgage Credit."

**INFO SIGHT 360**

**VIRTUAL SESSION**

APRIL 21, 2026

Mortgage Loan Originator Training

WHAT'S COVERED:

- Loan Originator Roles
- Application Requirements
- Underwriting Requirements
- Closing Requirements
- Servicing Requirements
- Fair Lending Considerations

InfoSight360 to Offer Required Loan Originator Training

03/25/2026

On April 21st, InfoSight360's Director of Regulatory Compliance Counsel Michael Christians will host a virtual loan originator training session from 9am to 3pm ET.

**NCUA Proposes Overhaul of Part 749 in Newest Deregulation Proposal**

03/18/2026

On March 10th, the National Credit Union Administration (NCUA) announced its latest round of proposed changes under its deregulation project.

**NCUA Announces Sixth Round of Deregulation Proposals**

03/10/2026

On February 24th, the National Credit Union Administration (NCUA) announced another round of proposed changes under its deregulation project.

**Required Compliance Training**

Compliance training is an important component of any credit union's operations, ensuring that employees are aware of and adhere to legal, regulatory, and ethical standards.

[Click here for a list of Required Compliance Training.](#)

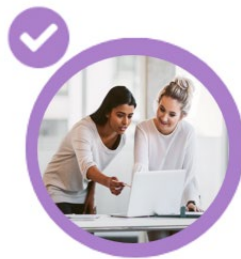
INFO SIGHT 360

# INFOSIGHT360

## Small Credit Union Benefits



InfoSight



CU PolicyPro



RecoveryPro

# »» Small Credit Union Benefits

- Credit unions that are considered “small asset size,” which varies based on the applicable regulation, often have **exceptions/exemptions** within the regulation.
- Be familiar, because they can save you some compliance headaches!
  - **Real Estate Lending**
    - Small Creditor – Ability to Repay (Regulation Z)
    - Small Servicer – Mortgage Servicing (Regulation Z and X)
    - Home Mortgage Disclosure Act (HMDA) (Regulation C)
  - **Balance Sheet**
    - Liquidity and Contingency Funding Plans (NCUA 741.12)

# Small Credit Union Benefits

INFO SIGHT 360 | LeDu Test Credit Union

Home My 360 View InfoSight CU Policy RecoveryPro

InfoSight > Compliance Topics

Search InfoSight

- Compliance Topics
- A - Z Listing
- Checklists

- Accounts
- ACH/Electronic Payments
- Advertising
- Bank Secrecy Act
- Bankruptcy and Collections
- Board Responsibilities
- Employment
- Field of Membership
- Fraud
- Investment
- Loans and Leasing
- Record Retention
- Security
- Tax Issues

- Within InfoSight, get summaries of applicable **state and federal** laws/regulations that apply to an area of operation.
- **Checklists** are available to assist with compliance.
  - **Advertising checklists** can help ensure compliant marketing.

Massachusetts Change

## Mortgage Servicing

Last Reviewed: January 2026

The Mortgage Servicing Rules published by the Consumer Financial Protection Bureau (CFPB) are based on the provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act) amended the Real Estate Settlement Procedures Act (RESPA) of 1974, which is implemented by Regulation X, and the Truth in Lending Act (TILA), which is implemented by Regulation Z, with regard to the servicing of certain residential mortgage loans.

- Summary
- Laws & Regulations
- Additional Resources

On This Page

- Mortgage Servicing
- Summary
- Laws & Regulations
- Additional Resources

Other Resources

Model Policies

- Policy 7330: Residential Real Estate Loans
- Policy 7360: Mortgage Servicing
- Policy 7361: Small Servicer Mortgage Servicing Rules
- Policy 9210: HUD Regulation X: Real Estate Settlement Procedures Act

Have questions? Try our InfoSight360AI Bot! Still have questions? [Contact Us](#)

# »» Small Credit Union Benefits

Massachusetts [Change](#) ▾

## Ability to Repay

Last Reviewed: March 2026

Credit unions that make closed-end consumer loans secured by a dwelling must comply with Consumer Financial Protection Bureau (CFPB)'s Ability-to-Repay/Qualified Mortgage (ATR/QM) Rule for loan applications. When the Ability to Repay rule and underwrites certain "qualified mortgages," it has certain protections that requires the credit union to assess a member's ability to repay the loan based on the member's dwelling.

Summary

FAQs

Laws & Regulations

Additional Resources

Have questions? Try our [InfoSight360](#)

Massachusetts [Change](#) ▾

## Home Mortgage Disclosure Act

Last Reviewed: January 2026

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is enforced by the Consumer Financial Protection Bureau (CFPB) Regulation C. This regulation provides the public loan data to help identify areas where housing needs are not being met.

- Determine whether financial institutions are serving the housing needs of the community;
- Assist public officials in distributing public-sector investments to attract private investment to areas where needed; and
- Identify possible discriminatory lending patterns.

This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions.

Summary ▾

Checklist ▾

FAQs ▾

Laws & Regulations ▾

Additional Resources ▾

## Advertising Loans: Checklist - Closed-End Consumer Loan Advertising

Advertising Considerations

Y/N

Comments

### Regulation B

Does the advertisement refrain from indicating a preference for a particular segment of the population on a prohibited basis?

Is the advertisement accurate and not misleading? Are the terms actually available?

Is the purpose of the loan advertised for home improvements, even though no mortgage or other security is to be obtained by the credit union? If yes, insure compliance with the Equal Housing Logo and slogan (see real estate loan checklist).

### Regulation Z

Is the advertisement "clear and conspicuous" (i.e., legible and easily understood)?

Are rates expressed as either an "Annual Percentage Rate" or an "APR"? Is this disclosure more conspicuous than other required disclosures?

# Small Credit Union Benefits

- Utilize the search feature within InfoSight360 to bring you relevant content.

INFOSIGHT360

LeDu Test Credit Union

InfoSight360 Education Compliance Help Support Search Michigan

Home My 360 View InfoSight CU PolicyPro RecoveryPro Resources CU Documents Discussion Board Admin

Welcome back, Gloru

Type keyword

Traditional Search

SEARCH

small credit union

Results for "small credit union"

360 results found

All InfoSight CU PolicyPro RecoveryPro File

Small Credit Unions COMPLIANCE TOPICS

Last Reviewed: November 2025

In September, 2015, the National Credit Union Administration Board approved updating the definition of the term "small entity" under the RFA increased from \$50 million to \$100 million and...

Small Credit Unions: FAQs COMPLIANCE TOPICS

Why did the NCUA revise the small credit union threshold?

The NCUA considered increasing the asset threshold because of a concern that the threshold regulatory burdens of small credit unions. By proposing an increase in the threshold the NCUA...

Small Credit Unions: Summary COMPLIANCE TOPICS

Small asset size credit unions (currently under \$100 million as defined by the NCUA) have different regulatory burdens for credit unions under certain asset sizes.

Contingency and Liquidity Funding (

Live chat when you have support questions!



How can we help you today?

The artificial intelligence (AI) search can also help drive your team to the right resources and answer questions

Want to chat with a person?

INFOSIGHT360

# INFORMSIGHT360

## Juggling Priorities



InfoSight



CU PolicyPro



RecoveryPro

# Juggling Priorities

INFO SIGHT 360 | LeDu Test Credit Union

InfoSight360 Education Compliance Help Support Search

Home My 360 View InfoSight CU PolicyPro RecoveryPro Resources CU Documents Discussion Board Admin

Account Insurance Estimator

CFPB Updates

Check Deposit Notice Generator

Collaborative Tools

Compliance Calendar

Compliance Videos

FAQs

Federal Regulations List

Newsletter

Required Compliance Training

RISK Alerts

Quick Actions Manage Users Manage Assignments

What would you like to view today?

My 360 View: If you prefer a more detailed view, use My 360 to create a customized workspace.

Compliance Information: InfoSight's comprehensive library of compliance information.

Model C: An extensive collection of customizable content.

My Assignments: 3 Open, 3 Overdue

Current Year (2026)

### January 2026

- January 1, 2026: [NCUA Succession Planning Effective Date](#)
- January 1, 2026: [New Years Day](#)
- January 1, 2026: [Minor Topics Rule Changes: NACHA Operating Rules](#)
- January 1, 2026: [2026 Annual Threshold Adjustments](#)
- January 19, 2026: [Martin Luther King, Jr.'s Birthday](#)
- January 30, 2026: [HMDA Reporters Record Quarterly Data](#)
- January 31, 2026: [Submission of Credit Card Agreements to the CFPB](#)
- January 31, 2026: [2025 Auto Loan Interest Statement](#)

### February 2026

- February 2, 2026: [Submission of Credit Card Agreements to the CFPB](#)
- February 5, 2026: [NACHA: Free Webinar: The ACH Rules are Changing. Are You Ready?](#)
- February 16, 2026: [Washington's Birthday](#)

### March 2026

- March 1, 2026: [CFPB: Residential Property Assessed Clean Energy Financing \(Reg Z\)](#)
- March 5, 2026: [Homebuyers Privacy Protection Act](#)
- March 20, 2026: [Fraud Monitoring \(Phase I\): NACHA Operating Rules](#)
- March 20, 2026: [Company Entry Descriptions: NACHA Operating Rules](#)

- Plan ahead to prepare adequate resources with the Compliance Calendar.

# »»» Juggling Priorities



Quarterly Update (March, 2026)

March 2026

- [Overview of Changes.docx](#)
- [1100.20 - Supervisory Committee Governance \(NEW\).docx](#)
- [2110 - Bank Secrecy Act - AML Program.docx](#)
- [2110.30 - Customer Due Diligence \(NEW\).docx](#)
- [2145 - Office of Foreign Assets Control \(REDLINED\).docx](#)
- [4100 - Physical Security Program \(NEW\).docx](#)
- [4100.10 - General Security Procedures \(REDLINED\).docx](#)
- [4100.20 - Burglary Procedures \(REDLINED\).docx](#)
- [4100.30 - Kidnapping Hostage Extortion Procedures \(REDLINED\).docx](#)
- [4100.40 - Robbery Procedures \(REDLINED\).docx](#)
- [4100.50 - Workplace Violence \(REDLINED\).docx](#)
- [4100.60 - Bomb Threats \(REDLINED\).docx](#)
- [4120.10 - Configuration Management \(REDLINED\).docx](#)
- [4120.20 - Patch Management \(REDLINED\).docx](#)
- [4120.30 - Firewalls \(REDLINED\).docx](#)
- [4120.40 - Computer Hardware and Software Acquisition \(REDLINED\).docx](#)
- [4120.50 - Remote Access \(REDLINED\).docx](#)
- [4120.60 - Change Management Procedures \(REDLINED\).docx](#)
- [4350 - Cloud Computing \(REDLINED\).docx](#)
- [7244 - Integrated Mortgage Disclosures \(REDLINED\).docx](#)
- [7330 - Residential Real Estate Loans \(REDLINED\).docx](#)
- [7350 - Ability to Repay \(REDLINED\).docx](#)
- [7351 - Small Creditor Ability to Repay \(REDLINED\).docx](#)
- [7360 - Mortgage Servicing \(REDLINED\).docx](#)

February 2026

- [11004 - Pre-Screened Offers of Credit or Insurance \(REDLINED\)](#)

January 2026

- [Overview of Changes \(January 2026\)](#)
- [7330 - Residential Real Estate Loans \(REDLINED\)](#)

A. **Placement:** Structuring currency deposits in amounts to evade reporting requirements, or commingling currency deposits of legal and illegal activities. Examples:

## Model Content Updates

### • 2026-1 (March 2026)

#### Bank Secrecy Act/Anti-Money Laundering Program – March 2026 Redlined Version

The BSA/AML policy was updated to include a reference to the new Customer/Member Due Diligence resource created (2110.30). In addition, changes were made to clarify the annual training requirement under BSA rules, the requirement to file SARs even for attempted or cancelled transactions (if warranted), recordkeeping requirements for shared branch transactions for monetary instruments, and verification requirements for 314(b) sharing. There were other administrative changes made to the policy for readability and clarity.

(Recommended)

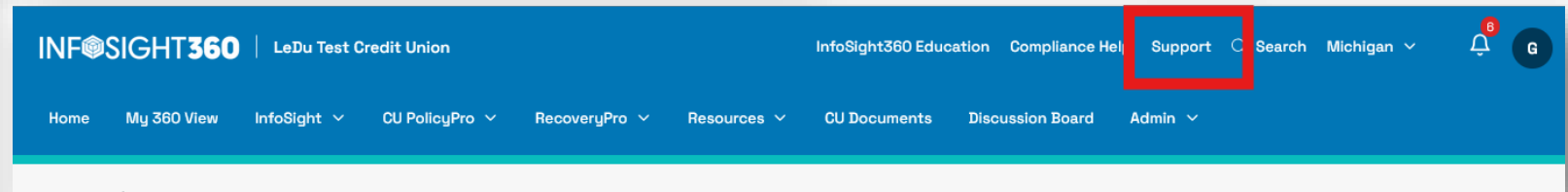
### • August 2025

#### Bank Secrecy Act/Anti-Money Laundering Program – August 2025 Redlined Version

The model BSA policy was updated to reflect that the Financial Crimes Enforcement Network (FinCEN) discontinued use of its legacy Secure Information Sharing System (SISS) on May 23, 2024. Positive matches to 314(a) requests must now be reported through the new FI Portal located at <https://fiportal.fincen.gov>

(Recommended)

- Stay on top of regulatory changes that may impact your policies and procedures.
- Review the content updates that are sent out via a **monthly newsletter**. [Sign up here!](#)
- Make sure to access the **Support** area for comprehensive details on changes.



# >>> Juggling Priorities

The screenshot displays the InfoSight360 web application interface. At the top, the navigation bar includes the logo, user name 'LeDu Test Credit Union', and various menu items like 'InfoSight360 Education', 'Compliance Help', 'Support', 'Search', and 'Michigan'. A user profile icon with the letter 'G' is highlighted with a red box. Below the navigation bar, a dropdown menu is open, showing options for 'My Account', 'My Assignments', 'Notification Settings' (highlighted with a red box), and 'Dark Mode'. In the background, a document snippet is visible with the text: "Act 'dirty' money through a series of transactions in order to 'clean' the funds so that they appear to be proceeds from legal activities. It may not involve currency (cash) at every stage of the laundering process, and generally involves three independent steps (that can occur at the same time):".

Overlaid on the interface is an email notification titled "Notification of Update - Policy 7351 Small Creditor Ability to Repay". The email is from Rhonda Criss and lists other recipients: Rhonda Criss, Glory LeDu, Mary Ann Koelzer, and Michael Christians. The email body states: "Good Afternoon, You are receiving this email because you have subscribed to content updates from InfoSight360. Please note that this content update will also be announced in the next InfoSight360 newsletter. The following content has been updated in InfoSight360: CU PolicyPro Model Content: 7351 - Small Creditor Ability to Repay". It includes a bullet point: "This policy was revised to update the asset threshold for determining whether the credit union meets the definition of a small creditor and is thus exempt from the qualified mortgage pricing test. This change became effective on January 1, 2026." and another bullet point: "7351 - Small Creditor Ability to Repay (REDLINED)". A "What's Next?" section provides instructions on how to handle the updated content, including a tip: "Tip: if you choose to copy/paste the updates into your custom content, we recommend accepting the changes in Word prior to copy/pasting." The email concludes with contact information for Rhonda Criss, Technology Products Manager at League InfoSight, with the email address rhonda.criss@infosight360.com.

To the right of the email is a "Content Update Notifications" settings panel. It allows users to manage email notifications for content updates. The panel is organized into sections: "InfoSight" (with a toggle switch), "Compliance Topics" (with a toggle switch), "CU PolicyPro" (with a toggle switch), and "Model Content" (with a toggle switch). Under "CU PolicyPro", there is a list of checkboxes for various topics, including "1100.10: Organization", "1100.11: Field of Membership", "1100.12: Board of Director's Duties", "1100.13: Compensation, Reimbursement, and Indemnification", "1100.14: Bond and Insurance Coverage", "1100.15: Education and Volunteer Training Guidelines", "1100.16: Strategic Planning", and "1100.17: Audits". The "1100.10: Organization" checkbox is highlighted with a red box.

• Sign up to receive an **email notification** on updates made to policies, procedures, and resources that are specific to you!

# Juggling Priorities

Admin > Assignments

ADD A FILTER

Assignment Name	Product	Assigned To	Date Added	Due Date	Recurring	Progress	Status
BIA Reviews	Recovery Pro	Glory - Basic LeDu +3	03/10/2026, 02:15 PM	03/20/2026	No	0/4 completed	Overdue
Please review this t...	InfoSight	Mary Ann Koelzer	01/07/2026, 01:35 PM	01/16/2026	No	0/1 completed	Overdue
Review this deceas...	InfoSight	Mary Test	10/23/2025, 02:40 PM	10/31/2025	No	0/1 completed	Overdue
Review in 6 monts	CU PolicyPro	Glory LeDu	10/01/2025, 01:20 PM	04/10/2026	No	0/1 completed	Not Started

**Add Assignment**

Assignment Name \*

Select a Product

User(s) Assigned \* Select Users

Due Date \*

Recurring Task

Add Notes

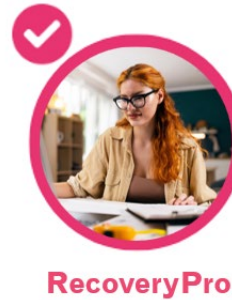
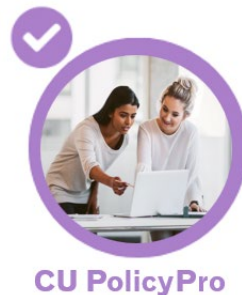
**Notifications Settings**

Assigned User will receive an initial notification email upon the creation of the assignment. Additional notifications are available as options below and apply only if the assignment has not been completed.

- Need help staying on top of different initiatives?
- Use the **Assignments** feature to create tasks with due dates and email reminders.

# INFOSIGHT360

Take Advantage of Resources



# »» Take Advantage of Resources

**InfoSight360 is a dues-supported resource! How else can you leverage in the system?**

- Have critical documents that staff and board members need to access? Use the **File Manager** area to store those resources. You can lock them down and restrict access or post them to the **CU Documents** area for all users.
- Some credit unions use the File Manager to **store Board Packages**.
- In addition to model policies, procedures, and resources, we try to create corresponding forms that might be required. Look under the **CU PolicyPro Resources** area.

# File Manager/CU Documents

INFO SIGHT 360 | LeDu Test Credit Union

InfoSight360 Education Compliance Help Support Search Michigan

Home My 360 View InfoSight CU PolicyPro RecoveryPro Resources CU Documents Discussion Board Admin

Admin > File Manager

Search files, folders

Files

Media

Post to CU Documents

Upload or drop

Name	Size	Date
<input type="checkbox"/> Credit-Union-Documents-3-25	--	03/27/2025, 06:19 AM
<input type="checkbox"/> Glory-CU-Documents---Managers	--	03/27/2025, 06:19 AM
<input type="checkbox"/> RecoveryPro Client Files	--	03/27/2025, 06:19 AM
<input type="checkbox"/> Testing-for-launch	--	03/27/2025, 06:19 AM
<input type="checkbox"/> Giving a user access to InfoSight.docx	75.59 KB	03/29/2025, 02:29 PM

• Files are NOT secure unless at least one security role has been added  
• Logos and graphics are not visible on PDF/Word downloads if a security role is added.  
• Multiple files can be selected, and each file should not exceed 5 MB in size.

- Store documents and resources within the **File Manager**. Documents can also be made available to all users through the **CU Documents** area.
- **Lock sensitive data** and restrict access, when applicable.

# Forms and Documents

CU PolicyPro > CUPP System Resources

## CU PolicyPro Sample Forms & Document

InfoSight360 has developed same forms & documents for specific policies to assist

- [Conflict of Interest Disclosure Form & Certification - Policy 1620](#)
- [Employee Agreement Regarding the Credit Union Fraud Policy - Policy 1645](#)
- [Employee Family Account Disclosure Agreement - Policy 1645](#)
- [Telecommuting Program Employee Agreement - Policy 2196](#)
- [Fraud Awareness Document - Elder & Vulnerable Adult Protections - Policy 2245](#)
- [Trusted Contact Information & Authorization Form - Policy 2245](#)
- [Language Preference Communication - Policy 2250](#)
- [Checklist for Advertising Disclosures - Policy 2500](#)
- [List of General Systems & Application Hardening Considerations - Policy 4305](#)
- [Change Request Form - Policy 4400](#)
- [Interest Rate Term & Credit Limit Tables - Policy 7170](#)
- [Record Disposition Log - Policy 10100](#)
- [Record Preservation Log - Policy 10100](#)
- [Engagement Letter - Procedure 1100.17](#)

## CU PolicyPro System Tools

- [Alphabetical Policy List](#)
- [Key Fields Listing for all Model Policies](#)
- [Policy List with Guidelines](#)
- [Table of Contents](#)

### Sample Conflict of Interest Disclosure Form and Certification For Use with 1620 – Conflict of Interest

*This is a sample provided by CU PolicyPro as a tool to assist the Credit Union in creating their own Disclosure Form and Certification. These types of forms should be created and reviewed with the Human Resources department and legal counsel, as applicable.*

Covered Credit Union Individuals must complete the following questionnaire to disclose any direct conflict and/or potential conflict between the Covered Credit Union Individual and any firm or organization that has, or may have in the coming year, a relationship with the Credit Union. For all “yes” answers, please attach additional sheets for explanation, if necessary.

1. Do you, your spouse or any other relative, have a business and/or professional relationship with any firm or organization that presently has, or may have in the coming year, business dealings with the Credit Union? **Yes No**

If “Yes”, please list: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Do you, your spouse or any other relative have a financial interest, direct or indirect, in any firm or organization that presently has business dealings with the Credit Union, or which might be reasonably expected to have business dealings with the Credit Union in the coming year? **Yes No**

If “Yes”, please list: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Have you, your spouse or any relative accepted gifts, gratuities, lodging, dining or entertainment in excess of the amount defined within Policy 1620 that might reasonably appear to influence your judgment or decisions concerning the business or direction of the Credit Union? **Yes No**

If “Yes”, please list: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Are there any affiliations (other than those identified above) for which you believe you might have a conflict of interest or the public may construe as a conflict of interest with the Credit Union? **Yes No**

If “Yes”, please list: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Valuable resources (such as forms and supporting documents) may also be available, corresponding to an applicable policy/procedure.

# »»» Edit and Publish Content



**Board to review**  
**LeDu Test Credit Union**  
**Published: October 1, 2025**

## Table of Contents

- [Chapter 1000: Administrative](#)
  - [Policy 1100: Credit Union Culture and Governance](#)
    - [1100.10: Organization](#)
      - [Overview 1: Overview for Board](#)
    - [1100.11: Field of Membership](#)
    - [1100.12: Board of Director's Duties](#)
    - [1100.13: Compensation, Reimbursement, and Indemnification \(Copy\)](#)
    - [1100.14: Bond and Insurance Coverage](#)
    - [1100.15: Education and Volunteer Training Guidelines](#)
    - [1100.16: Strategic Planning](#)
    - [1100.17: Audits](#)
    - [1100.19: Code of Ethics and Diversity](#)

## Overview 1: Overview for Board

CU PolicyPro > Published Documents

Create New + ADD A FILTER

Document Name	Status	Authorized Role	Published Date	Published by
UNC Chapel Hill Policies	Active		03/06/2026	Glory LeDu - Admin
4000 Chapter	Active		01/30/2026	Glory LeDu - Admin
Board to review	Active		10/01/2025	Glory LeDu - Admin
Lending Policies	Active	CUPP Lending Team	09/11/2025	Glory LeDu - Admin

Last Updated By: Glory LeDu - Admin | Date: 03/06/2026, 09:55 AM | Action: Imported | Added to Manual: 04/22/2021, 09:48 AM

View Last Published Version Save

General Information

Name: General Security Procedures Number: 4100

Associated Model Content: Physical Security Program Content Label: Policy

Revised Date: 04/13/2025 Reviewed Date: 04/15/2025 Board Approved Date: 04/18/2025

Draft Mode

Model Policy Revised Date: 06/01/2008

[[CName]]'s (Credit Union) security and emergency preparedness policy is designed to ensure safe and sound practices.

**Guidelines:**

1. SECURITY TRAINING. The Credit Union periodically conducts employee training sessions that thoroughly cover precautions and procedures of loss prevention.
2. STRICT CONFIDENTIALITY. Employees shall not talk carelessly in public about Credit Union business, security procedures, or cash handling procedures.
3. KEYS, COMBINATIONS AND PASSWORDS. The Credit Union will closely control Credit Union keys, combinations, and passwords. The President will change keys, combinations, and passwords, following the dismissal of an employee, or whenever prudent.
  - A. Keys.
    - i. The assignment of keys to specific employees requires prior management approval.
    - ii. All personnel assigned keys to Credit Union premises, cash drawers, main cash depositories, or cash lock boxes will be required to keep keys in their possession at all times. Under no condition should an employee allow anyone access to his or her keys when he or

# »» Policies/Resources for SAS

INFOSIGHT360

## Policy 5205 : Small Asset Liquidity Risk Management Policy

*This model policy is intended for credit unions that are under \$50 million in assets. The requirements for credit unions above this asset size are found within CU PolicyPro Model Policy 5200,*

**Model Policy Published Date:** 05/13/2024

### General Policy Statement:

The Board adopts the following liquidity management policy to better accommodate decreases in 's (Credit Union) deposits and fund increases in loans. The Board realizes that the credit union must remain resilient in times of economic stress and funds must be available at reasonable prices relative to competitors, and in maturities required to prudently support medium to longer term assets. Further, the Board acknowledges that liquidity is essential to compensate for expected and unexpected balance sheet fluctuations and to provide funds for growth.

Liquidity is the Credit Union's capacity to meet its cash and collateral obligations at a reasonable cost. Maintaining an adequate level of liquidity depends on the Credit Union's ability to efficiently meet both expected and unexpected cash flows and collateral needs without adversely affecting either daily operations or the financial condition of the Credit Union.

Liquidity risk is the risk that the Credit Union's financial condition or overall safety and soundness is adversely affected by an inability (or perceived inability) to meet its obligations.

### Guidelines:

- LIQUIDITY RISK MANAGEMENT.** The Credit Union's liquidity risk management will be sufficient to meet its daily funding needs, and cover both expected and unexpected deviations from normal operations. The critical elements of the Credit Union's liquidity risk management include the following:

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## Policy 7715 : Allowance for Credit Losses

*Note: This policy should be used by credit unions unless they are exempt from the new CECL requirements. Credit Unions exempt from adopting the new CECL requirements should continue to use Policies 7600 and 7615.*

**Model Policy Revised Date:** 7/21/2023

### General Statement:

's (Credit Union) financial statements provide for the full and fair disclosure of all assets, liabilities, and members' equity, including such allowance accounts necessary to fairly present the Credit Union's financial condition. The allowance for credit losses (ACL) represents the Credit Union management's evaluation of various factors influencing the collectibility and expected losses for all categories of loans and the proper valuation of loans. The allowance encompasses expected losses over the lives of the relevant financial assets.

This policy governs the Credit Union's allowance for credit loss policy, methodology, and documentation practices. This policy is designed to comply with the Interagency Policy Statement on Allowances for Credit Losses (Revised April 2023), Accounting Standards Codification (ASC) 326, *Current Expected Credit Loss Standard ("CECL")*, *Generally Accepted Accounting Principles ("GAAP")*, and all related laws and regulations.

### 1. RESPONSIBILITY.

- Board of Directors.** The Board of Directors is responsible for ensuring that the Credit Union has controls in place to determine the appropriate allowance for credit losses (ACL) in accordance with the Credit Union's policies, methodology, generally accepted accounting principles (GAAP), and supervisory guidance. The Board of Directors are also responsible for the

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## Methodology 7715.10 : Allowance for Credit Losses

**Model Methodology Revised Date:** 7/21/2023

1. **Overview.** This details the methodology utilized by the Credit Union to estimate expected credit losses over the lives of assets carried at amortized cost, purchased credit-deteriorated assets, and available-for-sale securities. FASB guidance allows for a wide variety of modeling technique methodologies and does not require any one specific approach when estimating Allowance for Credit Loss (ACL). The Credit Union uses its best judgement to apply and develop estimation techniques that are feasible given the size and complexity of the Credit Union and practical and relevant to the circumstance and the asset being evaluated. Along with the established governance structure and the following model methodology, the Credit Union's focus is to consistently apply methods and techniques that faithfully estimate the collectability of the Credit Union's assets.

FASB guidance indicates methods may vary on the basis of the type of financial asset, the Credit Union's ability to predict timing of cash flows, and the information available to the entity.

2. **Primary Components.** The Credit Union will utilize the following components when determining its ACL. The contribution of each component will be different based on the size, composition, and complexity of the Credit Union's portfolio.

- Data.** Relevant data will be collected and maintained to support the estimates of lifetime expected credit losses in a way that aligns with the methods used to estimate the ACL.
- Segmentation.** Assets are segmented based on similar risk characteristics, which may include both credit and noncredit characteristics.

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## Succession Planning



InfoSight



CU PolicyPro



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# »» Succession Planning

- Final rule became effective on **January 1, 2026**.
- Succession plan must be **approved by the Board of Directors** and consistent with the credit union's size and complexity.
- **Must include covered positions:**
  - Board of Directors
  - Management - Bylaws (Senior Executive Officers – 701.14(b)(2))
  - Assistant Management - Bylaws
  - Other critical personnel
- The succession plan **must also include:**
  - Title for each covered position, expiration of term or other anticipated vacancy (if known).
  - **Plan for permanently filling vacancies** for each position.
  - **Strategy for recruiting candidates** to fill positions.
  - **Budgetary impact** of executing a succession plan.

# »»» Succession Planning

## Policy 1520 : Succession Planning

Print

Close

Revised Date: 12/04/2025

Model Policy Revised Date: 12/4/2025

### General Policy Statement:

's (Credit Union) success is dependent upon placing the right people in the appropriate positions at the right time. The succession plan is designed to ensure the continued effective performance and safety and soundness of the Credit Union by planning for the ongoing development, placement, and replacement of key people. The goal is to make succession activities part of the strategic planning process and integral to business operations and governance.

Through the succession plan, the Credit Union seeks to provide significant opportunities for employees, increase the pool of promotable employees, encourage advancement of diverse groups, and ensure the Credit Union is able to adapt to a rapidly changing business environment. Succession plans and activities are closely monitored to ensure that they are consistent with the Credit Union's commitment to success and to Equal Employment Opportunity. The Succession Guidelines are suggested, and may be altered or eliminated at any time, and may not be followed in every instance.

1. **COMMITMENT TO PROMOTION FROM WITHIN.** The Credit Union is firmly committed to promoting from within whenever possible. The Credit Union is committed to assisting employees in developing their potential and in pursuing their career goals.
2. **TIMING.** Succession planning is an ongoing activity. However, management will review and update plans at least every 24 months.
3. **PROCESS.**

### Policy 1520: Succession Planning

2



#### 1520.10: Succession Plan

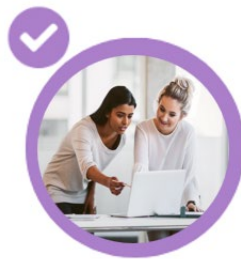
#### 1520.20: Associate Board Member

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## Other Resources Available



InfoSight



CU PolicyPro



RecoveryPro

# »»» Training

INFOSIGHT360



## Catalog



2026 Compliance Bootcamp  
Online Course

\$799.00



Equal Credit Opportunity Act / Regulation B  
Online Course

\$175.00



Mortgage Loan Originator Training  
Instructor Led Course

\$199.00



SAFE Act / Regulation G  
Online Course

\$49.00



Supervisory Committee Foundations  
Online Course

\$175.00



Unmasking the Threat Within: How to Detect and...  
Online Course

\$75.00



- **Relevant training** available for purchase through the [Learning Management System](#).

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# »» Business Continuity Planning

## RecoveryPro

- Online system that guides credit unions through the creation, maintenance, and testing of robust business continuity plans (BCPs).
- Model content, checklists, worksheets, business process summaries, and more are provided and can be completely customized to your credit union's operations.
- **Same technology as CU PolicyPro.**
- **Annual Investment**
  - Under \$50M - \$249
  - \$50M-\$150M - \$549
- Content and technical support are provided!



**It pays to prepare for the worst.**

**RecoveryPro** ✓

**can help!**

**INFOSIGHT360**

**INFOSIGHT360**

# »»» Business Continuity Planning

The screenshot displays the InfoSight360 web application interface for LeDu Test Credit Union. The top navigation bar includes the logo, user name, and various utility links like 'InfoSight360 Education', 'Compliance Help', 'Support', 'Search', and 'Michigan'. A secondary navigation bar contains menu items such as 'Home', 'My 360 View', 'InfoSight', 'CU PolicyPro', 'RecoveryPro', 'Resources', 'CU Documents', 'Discussion Board', and 'Admin'. The 'RecoveryPro' dropdown menu is open, listing options: 'Model BCP', 'CU BCP', 'Archives', 'Published Documents', 'Key Fields', and 'RP System Resources'. Below the navigation is a search bar with the placeholder 'Type keyword' and a 'SEARCH' button. A 'Quick Actions' section features buttons for 'Edit CU BCP' and 'Manage Assignments'. The main content area is titled 'What would you like to view today?' and contains six dashboard tiles: 'My 360 View', 'Compliance Information', 'Model Content', 'Published Documents', 'My Assignments' (with 3 Open and 2 Overdue items), and 'CU Documents'.

# »»» Required Audit Packages

- **Audit Essentials Package**
  - **BSA and ACH Audits**, annually
  - Fully remote solution
  - Built-in compliance support
  - Access to the risk assessment library
- **Annual Investment**
  - Under \$50M - \$2,500
  - \$50M-\$100M - \$2,900
- **Compliance Support includes:**
  - Onboarding training for unlimited users
  - Platform and message monitoring
  - Draft report reviews/discussions
  - Remediation advice

# »»» Required Audit Packages

- **4 Audit Package**
  - **BSA, ACH, SAFE Act, Website Compliance**, all performed annually, with the credit union choosing the schedule.
  - Fully remote solution
  - Built-in compliance support
  - Access to the risk assessment library
- **Annual Investment**
  - Under \$50M - \$4,000
  - \$50M-\$100M - \$4,600
- **Compliance Support includes:**
  - Onboarding training for unlimited users
  - Platform and message monitoring
  - Draft report reviews/discussions
  - Remediation advice



# »» Quarterly Compliance Reviews

- **Choose Operational Areas**

- The credit union can choose the **quarterly focus** from the following operational areas:
  - Lending
  - Deposits
  - Compliance Management
  - Operations
  - Advertising/Marketing
- Selections can be adjusted annually.
- Built-in compliance support

- **Annual Investment**

- Under \$50M - \$5,500
- \$50M-\$100M - \$5,750



# »» Vendor Management

- CU Vendor Management is a cloud-based technology platform (available 24/7).
- Hands-on support with a dedicated analyst who serves as your go-to.
- Collection of due diligence documentation for all critical vendors annually.
- Risk rating system built into the software.
- Personalized reporting suite (Reports for exams, board meetings, annual review).
- Trained analysts performing reviews of SOC and financials (limited reviews).
- Unlimited contracts.
- Monitoring of market issues and performance of vendor partners, OFAC, etc.
- **Annual Investment**
  - Under \$30M – One-time setup fee: \$1,500, monthly fee: \$300
  - \$31M-\$60M - One-time setup fee: \$1,875, monthly fee: \$475
  - \$61M-\$100M - One-time setup fee: \$2,750, monthly fee: \$575

# »»» More Information

- [Register for InfoSight360](#)
- [Register for CU PolicyPro](#)
- [Sign up for the InfoSight360 Newsletter](#)
- [Learn more about \*\*RecoveryPro\*\*](#)
- [Learn more about \*\*Required Audits or Compliance Reviews\*\*](#)
- [Learn more about \*\*CU Vendor Management \(CUVM\)\*\*](#)

# »»» Questions?

Sometimes it's a struggle to be small

**INFO****SIGHT360**

has resources for even the smallest  
credit unions



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