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[NCUA's FOIA Portal \(PAL\)](#)

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National Credit Union Administration

Office of General Counsel

October 18, 2022

SENT BY E-MAIL

This letter responds to your September 19, 2022 Freedom of Information Act (FOIA) request to the National Credit Union Administration (NCUA). You requested a clear digital copy of the DOCA Operations Manual dated February 27, 2020, or the most recent version if there is a newer one.

Attached please find the records responsive to your request. Redacted and withheld information is exempt from FOIA release under exemption 5 U.S.C. § 552(b)(8). Exemption 8 protects information about matters that are contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions.

You may direct any questions about this response to me or other NCUA FOIA staff by telephone at 703-518-6540 or e-mail at FOIA@ncua.gov. You also have the right to seek assistance from the NCUA FOIA Public Liaison, available at the same phone number and e-mail address. You also have the option to contact the Office of Government Information Services at the National Archives and Records Administration to inquire about FOIA mediation services. Contact information for OGIS: NARA is by email to ogis@nara.gov or telephone, 202.741.5770 or 1.877.684.6448.

If you are not satisfied with the FOIA reply, you may file an administrative appeal. It must be in writing and submitted within 90 days from receipt of the records. If you file an appeal, please send it by email to FOIA@ncua.gov with "NCUA OGC-FOIA APPEAL" in the subject line.

Sincerely,

ELIZABETH HARRIS

Digitally signed by ELIZABETH
HARRIS

Date: 2022.10.18 16:29:35 -04'00'

Elizabeth Harris
Associate General Counsel of Information and
Access Law

GC/EH:ve
22-FOI-00093
Attachments

OFFICE OF CONSUMER FINANCIAL PROTECTION

DIVISION OF CONSUMER AFFAIRS OPERATIONS MANUAL

Last updated April 2022

For Internal OCFP Use Only



An operations manual for Division of Consumer Affairs staff on the NCUA Consumer Assistance Center, Financial Literacy and Outreach Programs, and Digital Outreach.

CHAPTER 1: NCUA and OCFP Overview

The DOCA Operations Manual contains essential information required to perform the duties of a Division of Consumer Affairs (DOCA) staff member. This manual includes procedures, references, and illustrations to use during daily operations. **The online version of this manual is available at S:DOCA/Consumer Assistance Center/3-New Manual.**

1.1 Manual Purpose and Scope

This policy manual is designed to provide clear and timely information on DOCA policies relating to employees and their responsibilities within DOCA. Information is presented in the following categories:

- NCUA and OCFP Overview
- DOCA Policies and Procedures
- Appendix

The manual is intended to provide policies, practices, and procedures with links to more detailed information and guidance on NCUA programs and applications used by DOCA staff. Additional OCFP and NCUA policies and procedures may be found on the Agency's intranet site, [NCUA Central](#).

Staff are encouraged to use the information contained in this manual and NCUA Central for the consistent application of policies and procedures. This manual supplements the direction provided by the DOCA Director for operation of the Division.

The policies referred to in this manual are intended to be ongoing. However, OCFP management reserves the right to amend or terminate these policies at any time. Notice will be provided to staff when there is a change to a Divisional policy or procedure.

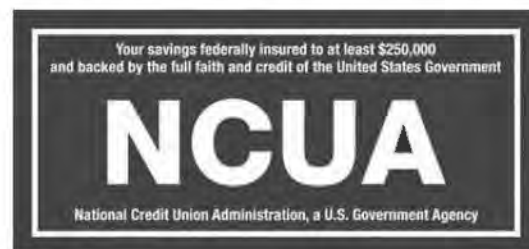
1.2 About NCUA



On June 26, 1934, President Roosevelt signed the Federal Credit Union Act into law authorizing the formation of federally chartered credit unions in all states. The purpose of the federal law was to make credit available and promote thrift through a national system of nonprofit, cooperative credit unions.

After the Federal Credit Union Act was signed into law, the new Bureau of Federal Credit Unions was first housed at the Farm Credit Administration. Regulatory responsibility shifted over the years as the Agency moved from the Federal Deposit Insurance Corporation to the Federal Security Agency, and then the Department of Health, Education and Welfare. Meanwhile, in the '40s and '50s credit unions grew steadily and by 1960 credit union membership reached more than 6 million people at over 10,000 federal credit unions.

In 1970, the Bureau became an independent federal agency when the National Credit Union Administration was formed to charter and supervise federal credit unions, and the National Credit Union Share Insurance Fund (NCUSIF) was also formed to insure credit union deposits. In the independent credit union spirit, the NCUSIF was created without tax dollars and capitalized solely by credit unions.



The 1970s brought major changes in the products offered by financial institutions and credit unions found they too needed to expand their services. In 1977, legislation expanded services available to credit union members, including share certificates and mortgage lending. In 1979, a three-member Board replaced the NCUA administrator. That same year Congress created the Central Liquidity Facility, the credit union lender of last resort.

The 1970s were years of tremendous growth in credit unions. The number of credit union members more than doubled and assets in credit unions tripled to over \$65 billion.

Deregulation, increased flexibility in merger and field of membership criteria, and expanded member services characterized the 1980s. High interest rates and unemployment in the early '80s brought supervisory changes and insurance losses. With the Share Insurance Fund experiencing stress, the credit union community called on Congress to approve a plan to recapitalize the Fund.

In 1985, federally insured credit unions recapitalized the NCUSIF by depositing 1 percent of their shares into the Share Insurance Fund. Backed by the "full faith and credit of the United States Government," the fully-capitalized National Credit Union Share Insurance Fund has "fail safe" features. Since recapitalization, the NCUA Board has only charged credit unions a premium when the Fund dropped to a 1.25 percent equity ratio.

During the 1990s and into the 21st century, credit unions have been healthy and growing. Credit union failures remain low and the Share Insurance Fund maintains a healthy equity level. The original intent of Congress was to create a system of not-for-profit cooperatives that promote thrift and thwart usury.

Through the National Credit Union Share Insurance Fund (NCUSIF), the NCUA insures a majority of member deposits held in the nation's credit unions. The NCUA also works cooperatively with State Supervisory Authorities to maintain the safety and soundness of state-chartered credit unions.

The NCUA protects the safety and soundness of the credit union system by identifying, monitoring and combating risks to the National Credit Union Share Insurance Fund. Backed by the full faith and credit of the United States, the Share Insurance Fund provides members with at least \$250,000 of insurance. NCUA provides insurance to more than 110 million account holders in all federal credit unions and the overwhelming majority of state-chartered credit unions. Credit union members have never lost a penny of insured savings at a federally insured credit union.

Through robust and effective examinations, the NCUA ensures that credit unions are safe and viable financial institutions. When a credit union does fail, we work to minimize the impact of the failure on the entire credit union system.

The NCUA further plays a role in helping to ensure broader financial stability. The NCUA is a member of, and in the first quarter of 2013 chaired, the Federal Financial Institutions Examination Council (FFIEC). The Council is responsible for developing uniform principles, standards and report forms and for promoting uniformity in the supervision of depository financial institutions. The NCUA's Chairman is also a voting member of the Financial Stability Oversight Council (FSOC), an interagency body tasked with identifying risks and responding to emerging threats to the financial system.

The NCUA is also a member of the Financial Literacy and Education Commission (FLEC). The FLEC is comprised of more than 20 federal agencies, including the NCUA, and chaired by the U. S. Department of the Treasury and vice chaired by the Bureau of Consumer Financial Protection. The FLEC developed the U.S. National Strategy on Financial Literacy, the agency's DOCA Financial Literacy and Outreach Analyst manages policy coordination on FLEC and ensures the NCUA complies with the U.S. National Strategy.

In 2013, NCUA relied upon 1,247 full-time equivalent employees to perform all the vital tasks in the Agency's insurance, consumer protection and regulatory roles. NCUA operates a central office located in Alexandria, Virginia; an Asset Management and Assistance Center, located in Austin, Texas, to liquidate credit unions and recover assets; and five regional offices. In these regional offices, NCUA has 71 supervisory groups, each with eight to ten examiners responsible for a portfolio of credit unions covering all 50 states, Guam, Puerto Rico and the U.S. Virgin Islands.

With a steadfast commitment to responsible governance, NCUA ensures that all credit union members can continue to access the services they need to help achieve financial security and pursue their dreams.¹

¹ <http://www.ncua.gov/Legal/Documents/Reports/Plan2011-2014Amend12-11.pdf>

NCUA's central office is located in Alexandria, Virginia, with regional offices in Alexandria, Virginia; Austin, Texas; and Tempe, Arizona. NCUA also operates the Asset Management and Assistance Center (AMAC), located in Austin, Texas.

Additional information on credit unions and NCUA:

- History of Credit Unions -
<http://www.ncua.gov/about/history/Pages/CUHistory.aspx>
- Historical Timeline of Credit Unions -
<http://www.mycreditunion.gov/Pages/historical-timeline-of-credit-unions.aspx>
- NCUA Leadership -
<http://www.ncua.gov/about/history/Pages/LeadershipHistory.aspx>
- NCUA Organizational Chart -
http://www.ncua.gov/about/Leadership/Pages/page_org.aspx

1.3 NCUA Organizational Structure

NCUA has a three-member Board of Directors appointed by the President of the United States and confirmed by the U.S. Senate. By law, no more than two Board members are from the same political party, and members serve staggered six-year terms. The NCUA Board normally meets monthly (except in August) in open session in Alexandria, Virginia. The NCUA Board oversees NCUA's operations by setting policy, approving budgets and adopting rules. NCUA Central Offices (CO) include examination and supervisions programs. Three regional offices (RO) manage the oversight of credit unions.

1.4 NCUA Offices – Brief Overview

NCUA Headquarters

Office of the Board

THE HONORABLE TODD M. HARPER (CHAIRMAN)

Todd M. Harper was nominated to serve on the NCUA Board on February 6, 2019. The U.S. Senate confirmed him on March 14, 2019, and he was sworn in as a member of the NCUA Board on April 8, 2019. President Joseph R. Biden, Jr., designated him as the NCUA's twelfth Chairman on January 20, 2021.

As NCUA Board Chairman, Mr. Harper serves as a voting member of the Financial Stability Oversight Council and represents the NCUA on the Federal Financial Institutions Examination Council and the Financial and Banking Information Infrastructure Committee.

Prior to joining the NCUA Board, Mr. Harper served as director of the agency's Office of Public and Congressional Affairs and chief policy advisor to former Chairmen Debbie Matz and Rick Metsger. He is the first member of the NCUA's staff to become an NCUA Board Member and Chairman.

Mr. Harper previously worked for the U.S. House of Representatives as staff director for the Subcommittee on Capital Markets, Insurance, and Government-Sponsored Enterprises and as legislative director and senior legislative assistant to former Rep. Paul Kanjorski (D-Pennsylvania). In these roles, he contributed to every major financial services law, from the enactment of the Gramm-Leach-Bliley Financial Services Modernization Act in 1999 through the passage of the Dodd-Frank Wall Street Reform and Consumer Protection Act in 2010.

During the Great Recession, Mr. Harper coordinated the first congressional hearing to explore the creation of a Temporary Corporate Credit Union Stabilization Fund. He also spearheaded staff efforts in the U.S. House to secure enactment of a law to lower the costs of managing both the Corporate Stabilization Fund and the National Credit Union Share Insurance Fund.

Mr. Harper led staff negotiations over several sections of the Dodd-Frank Act, including the Kanjorski amendment to empower regulators to preemptively rein in and break up “too-big-to-fail” institutions and proposals to enhance the powers of the Securities and Exchange Commission. He also developed the legislative framework for the bill that created the Federal Insurance Office to monitor domestic and international insurance issues.

THE HONORABLE KYLE S. HAUPTMAN (VICE CHAIRMAN)

Kyle S. Hauptman was nominated to serve on the NCUA Board on June 15, 2020. The U.S. Senate confirmed him on December 2, 2020, and he was sworn in as a member of the NCUA Board on December 14, 2020. The NCUA Board approved his designation as Vice Chairman of the NCUA on December 18, 2020.

Prior to his joining the NCUA Board, Mr. Hauptman served as Senator Tom Cotton’s (R-Arkansas) advisor on economic policy, as well as Staff Director of the Senate Banking Committee’s Subcommittee on Economic Policy.

Previously, Mr. Hauptman was Senior Vice President at Jefferies & Co. He worked at Lehman Brothers as a bond trader in New York City as well as in their international offices in Tokyo and Sydney, and served as a voting member on the U.S. Securities and Exchange Commission Advisory Committee on Small and Emerging Companies.

Mr. Hauptman served on President Donald J. Trump’s transition team in 2016 and was Senator Mitt Romney’s (R-Utah) policy advisor for financial services during the 2012 presidential campaign.

Mr. Hauptman holds a Master’s in Business Administration from Columbia Business School and a bachelor of arts from University of California, Los Angeles

THE HONORABLE RODNEY E. HOOD (BOARD MEMBER)

President Donald J. Trump nominated Rodney E. Hood for the NCUA Board on January 19, 2019. The U.S. Senate confirmed him on March 14, 2019, and he

was sworn in as the eleventh NCUA Chairman on April 8, 2019. Mr. Hood served as the NCUA's Chairman until January 25, 2021.

As a Board Member, Mr. Hood serves as the NCUA's representative on the Board of Directors of NeighborWorks America, one of the nation's leading affordable housing and community development organizations. This is his second time serving as the agency's representative on the board of NeighborWorks.

Mr. Hood was previously nominated to the NCUA Board by former President George W. Bush and served from November 2005 until August 2009. During his first term on the Board, he was appointed Vice Chairman.

Immediately prior to rejoining the NCUA Board in 2019, Mr. Hood served as a corporate responsibility manager for JPMorgan Chase, managing national partnerships with non-profit organizations, financial regulators, and community stakeholders to promote financial inclusion and shared prosperity in underserved communities throughout the United States.

His previous experience includes serving as associate administrator of the Rural Housing Service at the U.S. Department of Agriculture. In this role, he helped to address the housing needs in rural communities and administered the agency's \$43 billion mortgage portfolio.

Prior to his public service, Mr. Hood served as marketing director and group sales manager for the North Carolina Mutual Life Insurance Company in Durham, North Carolina. He also served as national director of the Emerging Markets Group for Wells Fargo Home Mortgage and served on the board of the Wells Fargo Housing Foundation. Earlier in his career, he worked for Bank of America as a Community Reinvestment Act officer and completed the management development program at G.E. Capital.

In addition to his public and private sector service, Mr. Hood served as a member of the University of North Carolina at Chapel Hill Board of Visitors and as member of the UNC School of Arts Board of Trustees. He also served as a member of the Board of Trustees for the North Carolina Museum of Art and

as a member of the Board of Governors for the University of North Carolina College System.

A native of Charlotte, North Carolina, Mr. Hood holds a bachelor's degree in business, communications, and political science from the University of North Carolina at Chapel Hill.

Office of the Chief Economist (OCE)

The mission of the Office of the Chief Economist (OCE) is to support NCUA's safety and soundness goals through providing economic intelligence, enhancing NCUA's understanding of emerging microeconomic and macroeconomic risks, producing meaningful and robust modeling and risk identification tools, participating in Agency and inter-agency policy development, and developing new initiatives.

Office of the Chief Financial Officer (OCFO)

The Office of the Chief Financial Officer is responsible for development and implementation of travel policies and programs, Agency budget preparation and management, ongoing finance and accounting functions, accounts payable, payroll, administration of credit union operating fees and capitalization deposits and NCUSIF operations.

Office of the Chief Information Officer (OCIO)

The Office of the Chief Information Officer (OCIO) is responsible for managing NCUA's automated information resources. This includes: collecting, validating, and securely storing electronic Agency information; developing, implementing, and maintaining computer hardware, software, and data communications infrastructure; and ensuring related security and integrity risks are recognized and controlled.

Office of Consumer Financial Protection (OCFP)

The Office of Consumer Protection (OCFP) reflects NCUA's heightened focus on consumer protection. Established in 2010, OCFP includes the Division of Consumer Affairs, the Division of Consumer Compliance Policy and Outreach. See Section 1.5 for additional information on OCFP.

Office of Continuity and Security Management (OCSM)

The Office of Continuity and Security Management (OCSM) is responsible for addressing and managing security and continuity programs across NCUA and its regional offices. In this role, OCSM has four areas of responsibility.

- **National Continuity Programs:** Addresses continuity of operations, continuity and emergency communications, critical infrastructure and resource protection, as well as continuity training and exercises.
- **Emergency Management & Physical Security Programs:** Addresses facility security, threat assessments, personnel protection activities, emergency planning and management, and protecting critical NCUA infrastructure.
- **Personnel Security Programs:** Addresses all personnel security issues including background investigations for new hires, contractors, current employees and employee transfers.
- **Intelligence & Information Security Programs:** Addresses intelligence operations, foreign visitor and foreign travel programs, cyber security, as well as national security clearance requirements, information security protocols and related training.

Office of Examination and Insurance (E&I)

The Office of Examination and Insurance provides national guidance for NCUA's efforts to assure the safety and soundness of federally insured credit unions. The Division of Supervision oversees NCUA's examination and supervision program. The Division of Risk Management oversees and directs NCUA's credit union problem resolution program. The Central Liquidity Facility provides liquidity for all credit unions and can invest in U.S. government and Agency obligations, deposits of federally insured institutions and shares or deposits in credit unions.

Office of the Executive Director (OED)

The Office of the Executive Director is responsible for the Agency's daily operation and the executive director reports directly to the NCUA Chairman. All regional and central office directors report to the executive director. NCUA's Equal Opportunity Program is included in this office.

DEPUTY EXECUTIVE DIRECTOR

The Deputy Executive Director (DED) is responsible for overseeing the day to day administrative operations of the Agency and other special programs within NCUA, including small credit unions and consumer protection initiatives. The DED also advises and assists the Executive Director in meeting the mission of the agency.

OMBUDSMAN (OMB)

NCUA's Ombudsman investigates complaints and recommends solutions. These complaints must relate to regulatory issues that cannot be resolved at the operational (regional) level.

The Ombudsman assists in resolving problems by helping the complainant define options, and recommending actions to the parties involved. However, the Ombudsman cannot at any time decide on matters in dispute or advocate the position of the complainant, NCUA, or other parties. The Ombudsman does not handle any matter:

- Subject to formal review as set forth in NCUA regulations or Interpretive Rulings and Policy Statements (IRPS),
- Involving an enforcement action for which a notice of charges has been filed in litigation,
- Involving a conservatorship or liquidation, or
- Within the Inspector General's jurisdiction.

All information and materials obtained as a result of a complainant's interview and any confidential records gathered during an investigation will be used only for purposes of the investigation and will not be disclosed outside of the Ombudsman's Office. The Ombudsman will make recommendations to appropriate agency officials for systemic changes to deal with recurring problems revealed through investigations. The Ombudsman reports to the NCUA Board and is independent from operational programs.

Office of General Counsel (OGC)

The Office of General Counsel (OGC) has responsibility for all legal matters affecting NCUA, to include the following:

- Representing NCUA in litigation
- Bringing enforcement actions against directors, managers, and other parties affiliated with credit unions
- Providing interpretations of the Federal Credit Union Act and NCUA rules and regulations to NCUA and outside parties
- Processing Freedom of Information Act (FOIA) requests and appeals
- Advising the Board and NCUA on general legal matters
- Drafting regulations designed to ensure the safety and soundness of credit unions.

Office of Human Resources (OHR)

The Office of Human Resources provides a full range of human resources functions to all NCUA employees. The office administers recruitment and merit promotion, position classification, compensation, employee records, training, labor relations, employee benefits, performance appraisal, incentive awards, adverse actions and other programs.

Office of Inspector General (OIG)

The Office of Inspector General (OIG) promotes the economy, efficiency, and effectiveness of NCUA programs and operations; detects and deters fraud, waste, and abuse; and supports NCUA's mission of monitoring and promoting safe and sound federally-insured credit unions. The OIG conducts independent audits, investigations, and other activities, and keeps the NCUA Board and U.S. Congress fully and timely informed of their work.

Office of Minority and Women Inclusion (OMWI)

The Office of Minority and Women Inclusion (OMWI) was formed in response to the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. OMWI is responsible for ensuring compliance with the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, both of which involve diversity, civil rights, and the promotion of minority and women hiring and contracting practices throughout the credit union industry. This includes:

- Equal employment opportunity and the racial, ethnic, and gender diversity of the workforce and senior management of NCUA,

- Increased participation of minority-owned and women-owned businesses in the programs and, contracts of NCUA, including standards for coordinating technical assistance to such businesses
- Assessing the diversity policies and practices of entities regulated by NCUA preserving credit unions run by minorities and/or serving minorities.

OMWI provides crucial focus and direction to NCUA and credit union efforts to reach all segments of the population. Ensuring diversity of our employees and contractors will open the door to new opportunities for NCUA, credit unions, and minorities and women.

Office of National Examinations and Supervision (ONES)

The Office of National Examinations and Supervision (ONES) was established on January 1, 2013 to oversee the unique examination and supervision issues related to consumer credit unions with assets greater than \$10 billion and all corporate credit unions. Large consumer credit unions pose unique challenges in light of their size in comparison to the NCUSIF. As a credit union for credit unions, a corporate credit union provides a variety of payment, liquidity and investment services. Corporate credit unions touch the operations of thousands of consumer credit unions through the critical services they provide. ONES staff includes examiners, lending specialists, capital market specialists, information systems specialists, and payment systems specialists to focus on key areas of potential risk. ONES is positioned to adapt its examination & supervision process in keeping pace with the changing financial & operational environment.

Office of External Affairs and Communications (OEAC)

The Office of External Affairs and Communications (OEAC) provides information to the public, credit unions, Congress, credit union league and trade organizations, the media, and NCUA employees about NCUA and its functions, Board actions, and other matters. OEAC keeps the NCUA Board and staff informed of pending federal legislation and serves as a liaison with members of Congress and Congressional Committee staff members.

Credit Union Resources and Expansion (CURE)

The Credit Union Resources and Expansion office (CURE) was formed to foster credit union development and their effective delivery of financial services, facilitate the expansion of credit union services through new charters and field of membership expansions, and coordinate efforts — with third-party organizations — to improve the viability and successful operation of credit unions. CURE administers the Community Development Revolving Loan Program, which supports low-income designated credit unions serving low-income communities with low-interest loans/deposits.

NCUA Field Offices

Outside the NCUA Headquarters, the NCUA has the Asset Management and Assistance Center and five regional offices.

Asset Management Assistance Center (AMAC)

The AMAC conducts credit union liquidations and performs management and recovery of assets. Additionally, AMAC assists NCUA regional offices with the review of large complex loan portfolios and actual or potential bond claims. AMAC also participates extensively in the operational phases of conservatorships and records reconstruction.

Regional Offices

The majority of NCUA staff are assigned to the agency's 3 regions. This staff regularly examines federally insured credit unions to ensure safe and sound operations.

EASTERN REGION – ALEXANDRIA, VA

SOUTHERN REGION – AUSTIN, TX

WESTERN REGION – TEMPE, AZ

Eastern Region
<ul style="list-style-type: none">• Connecticut• Maine• Massachusetts• Michigan• New Hampshire• New York• Rhode Island• Vermont• Wisconsin• District of Columbia• Delaware• Maryland• New Jersey• Ohio• Pennsylvania• Virginia• West Virginia

Southern Region
<ul style="list-style-type: none">• Alabama• Arkansas• Florida• Georgia• Indiana• Kentucky• Louisiana• Mississippi• North Carolina• Oklahoma• Puerto Rico• South Carolina• Tennessee• Texas• U.S. Virgin Islands

Western Region
<ul style="list-style-type: none">• Alaska• Arizona• California• Guam• Hawaii• Idaho• Illinois• Iowa• Kansas• Minnesota• Missouri• Montana• Nebraska• Nevada• New Mexico• North Dakota• Oregon• South Dakota• Utah• Washington• Wisconsin• Wyoming

1.4 Office of Consumer Financial Protection (OCFP) Overview & Leadership

In June 2009, the Obama Administration issued a regulatory restructuring plan, entitled *Financial Regulatory Reform: A New Foundation*. A major aspect of the regulatory restructuring was the creation of a new, independent Agency devoted to consumer financial protection, now known as the Bureau of Consumer Financial Protection or BCFP. A key reason cited for separating consumer protection from other supervision was the prudential financial institution regulators' potentially conflicting mission to promote safe and sound banking practices.

On November 19, 2009, the NCUA Board established the Office of Consumer Protection, now known as the Office of Consumer Financial Protection or OCFP to re-emphasize the significance of consumer financial protection and consumer compliance laws and regulations. The new office became fully functional in 2010. OCFP originally consisted of two divisions, the Division of Consumer Access and Division of Consumer Compliance and Outreach. Over the next two years, the need for additional resources focused on consumer protection and credit union membership continued to grow. In 2012 the Office split into four divisions to meet this need: the Division of Consumer Access (DCA); the Division of Consumer Access – South; the Division of Consumer Compliance Policy and Outreach (CCPO); and the Division of Consumer Affairs (DOCA). In 2018, the Division's of Consumer Access were reassigned to the Credit Union Resources and Expansion Office (CURE). Now, the OCFP consists of the Division of Consumer Affairs and the Division of Consumer Compliance Policy and Outreach.

OCFP has the overall responsibility for NCUA's consumer-related activities, including the interaction between enforcing consumer compliance regulations, assisting consumers with complaints and inquiries, providing consumers with financial literacy and education resources and information and promoting access to mainstream financial services via the cooperative credit union model. Providing financial education to credit unions and consumers is essential to meeting this responsibility.

OCFP's major objectives are to:

- Serve as the Agency's office with a sole focus on consumer financial protection. This group provides expertise and serves as a strong advocate for consumer safeguards and financial literacy education. The group also serves as a liaison between the consumers and the credit union industry to resolve complaints.
- Serve as the Agency's office in the areas of consumer compliance policy and rulemaking, financial literacy policy, fair lending policy and examinations.
- Serve as liaison with other government agencies on consumer financial protection and compliance issues.

OCFP's mission is to empower consumers with the knowledge necessary to make smarter financial decisions for a stronger, brighter future. For more information on OCFP, see NCUA's Letter to Credit Unions [11-CU-17](#) located in the Appendix.

OCFP Director and Deputy Director

The OCFP Director and Deputy Director oversee the direction, goals, and functions of the Division of Consumer Affairs (DOCA) and Division of Consumer Compliance Policy and Outreach. The OCFP Director and Deputy Director ensure the strategic goals of the OCFP office are achieved. In addition, the Division Director and Deputy Director report significant achievements and impediments to the Executive Director and/or NCUA Board.

OCFP ADMINISTRATIVE ASSISTANT

The OCFP Administrative Assistant reports to the OCFP Deputy Director and serves as the principal advisor to the OCFP Division Director and Deputy Director on administrative matters, office management, and support functions, as well as provides support services. The Administrative Assistant provides technical and administrative support in the areas of budget, financial management, procurement, records management, supplies and equipment, FOIA requests, time and

attendance, human resources, staff development, and other administrative matters.

1.5 Division of Consumer Compliance Policy and Outreach (CCPO)

The Division of Consumer Compliance Policy and Outreach (CCPO) is responsible for federal financial services consumer compliance policy and rulemaking, fair lending off-site supervision contacts and on-site examinations, and interagency coordination on consumer compliance issues.

1.6 Division of Consumer Affairs (DOCA)

The Division of Consumer Affairs (DOCA) is responsible for consumer complaints, congressional inquiries, interagency coordination on federal financial services consumer protection issues, financial literacy and outreach programs, digital outreach and the Agency's consumer protection website MyCreditUnion.gov. These functions are organized into three programs:

- (1) NCUA Consumer Assistance Center
- (2) Financial Literacy and Outreach
- (3) Digital Outreach

OVERVIEW OF DOCA PROGRAMS

NCUA Consumer Assistance Center

The NCUA Consumer Assistance Center (CAC) was created to answer questions, offer guidance, and assist consumers in resolving complaints about credit unions. Its function includes:

- Operating the call center;
- Responding to phone and written inquiries from consumers and credit unions about federal financial services consumer protection laws and regulations;
- Investigating consumer complaints against FCUs that involve federal consumer protection laws and consumer compliance regulations;
- Acting as call center support to the Emergency Management System (EMS), when activated; and

- Maintaining an online presence at www.MyCreditUnion.gov to answer common financial questions about FCUs and receive online consumer complaints against FCUs.

Part of the CAC is the Online CAC located on www.MyCreditUnion.gov. The Online CAC provides consumers with a means to:

- Research FAQs in the Knowledgebase;
- Look up common financial terms in the Glossary;
- Learn about OCFP, NCUA and role CFPB plays in consumer complaints;
- Browse NCUA Publications and Videos; and
- Submit an inquiry or complaint to CAC staff.

Financial Literacy and Outreach Programs

The NCUA's Financial Literacy and Outreach Programs (FLO Program) is housed in the Division of Consumer Affairs. Agency Financial Literacy and Outreach efforts that are managed by other NCUA offices, must coordinate any consumer related financial literacy efforts through the Office of Consumer Financial Protection and the Division of Consumer Affairs. The FLO Program implements the agency's financial literacy and outreach initiatives.

These initiatives involve the coordination of financial literacy and outreach policies (e.g. financial institution youth savings guidance), outreach products (e.g. videos, brochures, articles, infographics, social media content), supporting national financial literacy awareness campaigns, developing and executing MOUs/partnerships/collaborations, recommending and conducting research initiatives, recommending and developing performance measures and program evaluation policies and other efforts. Coordination and implementation is facilitated across the Agency including 2 OCFP divisions as well as the Public and Congressional Affairs, Office of Minority and Women Inclusion (OMWI), Regional, and Credit Union Resources and Expansion (CURE) offices.

DOCA retains the agency's only full-time equivalent devoted to serving as a technical advisor on financial literacy policy matters and overseeing appropriate NCUA contributions to the National Strategy on Financial Literacy and the U.S. Department of the Treasury's Financial Literacy and Education

Commission (FLEC). The NCUA's Financial Literacy and Outreach Analyst is the primary manager of all such efforts and also provides financial literacy subject matter and policy expertise on a range of consumer financial protection and financial literacy issues Agency-wide. Other members of the DOCA staff assist with financial literacy and outreach matters as needed. The FLO Program is designed to support and promote credit unions' statutory mission to promote thrift and responsible credit use among members.

The program also contributes to and supports the Agency's digital and social media platforms such as NCUA.gov, MyCreditUnion.gov, Facebook, Twitter and others. Many of the outreach efforts are national, collaborative campaigns composed of government, non-profit and private sector entities.

Specifically, the NCUA's Financial Literacy and Outreach Programs are designed to help implement and support the following:

- Administer related provisions of The Federal Credit Union Act – support and promote credit unions' statutory mission to promote thrift, responsible credit use and education among members.
- Statutory mandate of serving on the Financial Literacy and Education Commission (FLEC) and agency policy to actively participate in FLEC meetings.
- Implement related provisions in the NCUA's Annual Performance Plan and Strategic Plans.
- Educate credit unions and consumers about federal consumer financial protection issues.
- Support credit unions in their efforts to offer essential products and services, including financial education programs to all eligible members.
- Enhance communication with consumers and credit unions on consumer complaints.
- Collaborate with the other federal regulatory agencies as appropriate to protect consumers using credit union products and services.
- Use available NCUA delivery channels to promote consumer financial protection education.

- Engage with the credit union industry about consumer financial protection and compliance matters and the use of NCUA's financial literacy tools.
- Promote the value of diversity and inclusive financial services in credit unions.
- Support the U.S. National Strategy on Financial Literacy.
- Support Executive orders directing federal agencies to improve the financial literacy of Americans.
- Carry forward the longstanding tradition (over 80 years) of the NCUA (and its predecessor agencies) supporting the efforts of credit unions to provide member education and access to credit union services.

Digital Outreach Program

The Digital Outreach Program (DOP) focuses on using digital technology to provide financial literacy and consumer financial protection information to consumers and credit union staff. MyCreditUnion.gov is not only NCUA's consumer-focused website, but also the agency's primary financial literacy tool. The website is available in English and Spanish. As a result of nearly fifty percent of the visits to MyCreditUnion.gov originating from mobile devices, MyCreditUnion.gov is being redesigned using mobile first design. This design will allow the content to be easily readable on a variety of digital devices. The redesigned website, anticipated launch 4Q 2018, will also use an accessible design and meet 508 compliance standards.

See Division of Consumer Affairs Operations Manual, Chapters 2-8 for DOCA Policies and Procedures.

Chapter 2: Introduction

2.1 Overview

The Office of Consumer Financial Protection reflects NCUA's heightened focus on consumer financial protection. Established in 2010, the Office provides consumer financial services, including consumer education and complaint resolution; establishes, consolidates, and coordinates consumer financial protections within the agency; oversees the agency's fair lending examination program; and acts as the central liaison on consumer financial protection with other federal agencies. The Office includes the Division of Consumer Compliance Policy and Outreach and the Division of Consumer Affairs which operates NCUA's Consumer Assistance Center (CAC).

The primary function of the CAC is to respond to inquiries about federal financial consumer protection laws and regulatory matters, and to consumer complaints. The CAC addresses consumer complaints involving federally chartered credit unions (FCUs) with total assets up to \$10 billion, and in certain instances, federally insured state-chartered credit unions (FISCU).

2.2 Purpose and Scope

The Consumer Assistance Center Policy Manual for Operations is designed for internal use only to inform CAC staff of the CAC's policies concerning the processing of consumer inquiries and complaints. CAC staff should refer to this manual and any subsequent procedures to execute excellent consumer financial protection operations in the areas of customer service, verbal, and written communication; record retention and privacy; and consistent handling of consumer inquiries and complaints.

The manual includes relevant information, addresses control risks, and outlines employee responsibilities and accountability. The manual will be reviewed and if needed revised, annually by December 31st, and at other times as directed by the Director of the Division of Consumer Affairs.

Chapter 3: The Consumer Assistance Center

3.1 The Role of the Consumer Assistance Center

The Consumer Assistance Center is the designated repository for consumer complaints received by the NCUA.

The Consumer Assistance Center uses a robust and secure customer relationship management platform to intake and warehouse consumer complaint data. This system provides analytics and trends on consumer complaints that is shared with all NCUA Offices and Regions. It is also used to help identify consumer financial protection supervision priorities. The CAC also operates a call center that provides consumers with compliance resources and facilitates the complaint filing process.

The NCUA reports to Congress and other federal agencies on credit union compliance with certain laws and regulations. By designating the Consumer Assistance Center as the repository for consumer complaints, the NCUA protects the integrity of personally identifying information and ensures accurate reporting to internal and external stakeholders.

The NCUA Consumer Assistance Center requires all consumer complaints be submitted in writing. Exceptions to this policy may only be approved by the Director of Consumer Affairs as necessary and appropriate.

The Consumer Assistance Center is responsible for intaking and warehousing consumer-related inquiries² and complaints from credit union members, the public, and Congress via mail, fax, email, and the Consumer Assistance Center's online portal. In certain instances, as approved by the Director of Consumer of Affairs, complaints may be

² An inquiry is any question or request for information that does not rise to the level of a formal complaint against a federal credit union.

accepted verbally. Some of the inquiries and complaints are about various non-consumer financial protection matters pertaining to federally and state-chartered credit union operations and NCUA policies and programs. Depending on the nature and complexity of the inquiry or complaint, the Consumer Assistance Center may request input from, or refer the matter to, an NCUA regional or central office to provide a response.

3.2 Authority

The NCUA has statutory authority to conduct intake and resolution of consumer complaints regarding federal financial consumer protection laws and regulations.³

Federal credit unions are independent business entities operating under policies and procedures approved by the credit union's board of directors. The NCUA does not have the authority to investigate complaints about customer service or disagreements over specific federal credit union policies and procedures not addressed by federal law or regulation. In addition, the NCUA does not make determinations regarding contract disputes, undocumented factual disputes between a federal credit union and a member or matters that are the subject of a judicial order/opinion or pending litigation.

3.3 Types of Inquiries and Complaints received by NCUA

3.3.1 Federal Financial Consumer Protection Laws and Regulations

The Consumer Assistance Center will handle inquiries and complaints involving federal consumer financial protection laws and regulations within the NCUA's purview as outlined below:

³ See Section 1013(b)(3) and Section 1034 of the Dodd-Frank Act and Sections 1756 and 1766 of the Federal Credit Union Act.

3.3.2 Complaints Against Federal Credit Unions with Assets > \$10B

The Consumer Assistance Center will refer inquiries and complaints regarding federal consumer financial protection laws and regulations against credit unions with assets over \$10 billion dollars to the Consumer Financial Protection Bureau (CFPB) with a copy to the Office of National Examinations and Supervision (ONES) at ONESMail@ncua.gov, and appropriate state supervisory authority (SSA), as applicable. The Consumer Assistance Center will acknowledge receipt of the inquiry or complaint and formally indicate to the inquirer/complainant that it was referred to the CFPB for review and response.⁴ The CFPB will then process the complaint directly between the consumer and entity.

3.3.3 Complaints Against State-Chartered Credit Unions

The Consumer Assistance Center will acknowledge receipt of the inquiry or complaint and conduct intake for complaints about federal law that are within the Consumer Assistance Center's purview.

The Consumer Assistance Center will refer all complaints received involving federally insured, state-chartered credit unions (FISCUs) with assets of \$10 billion or less to the appropriate SSA with a copy to the NCUA regional office except for those in purview matters involving federal consumer protection laws as outlined above in the CAC Referral Chart. The Consumer Assistance Center will formally indicate to the inquirer/complainant that relevant correspondence was referred to the appropriate SSA for further review and handling.

The Consumer Assistance Center will refer all complaints involving federal financial consumer protection law or regulation received involving FISCUs

⁴ Pursuant to the Memorandum of Understanding (MOU) between the NCUA and the CFPB, the NCUA will refer any complaints or inquiries that relate to a federal consumer financial law or consumer financial products or services to the CFPB for handling if the complaint does not involve an entity supervised by NCUA.

with assets greater than \$10 billion to the CFPB with a copy to the appropriate SSA and ONES.

The Consumer Assistance Center will refer all other complaint matters received involving FISCUs with assets greater than \$10 billion to the appropriate SSA with a copy to ONES.

The Consumer Assistance Center will copy the appropriate SSA on any written complaint correspondence involving FISCUs. Additionally, the Regions should ensure any MOUs signed with the SSA's require the SSA refer all consumer complaints received involving federal credit unions to the Consumer Assistance Center.

3.3.4 Whistleblower and Anonymous Matters Involving Credit Unions

The Consumer Assistance Center will refer all inquiries and complaints involving whistleblower allegations or those filed anonymously to the appropriate regional office for handling. The Consumer Assistance Center will acknowledge receipt of the inquiry or complaint and formally indicate to the inquirer/complainant that it was referred to the appropriate NCUA office for further review and handling. Specialists will code the complaint in Salesforce as a whistleblower complaint and forward the complaint to the appropriate region or NCUA Office.

3.3.5 Federal Consumer Financial Protection Laws and Regulations Involving Safety and Soundness

The Consumer Assistance Center will refer all inquiries and complaints that have safety and soundness implications to the appropriate regional offices, as well any inquiry or complaint involving the following:

- Bank Secrecy Act;
- US Patriot Act;
- Flood Disaster Protection Act; or

- Secure and Fair Enforcement for Mortgage Licensing Act.

The Consumer Assistance Center will acknowledge receipt of the inquiry or complaint and formally indicate to the inquirer/complainant that it was referred to the appropriate NCUA regional office for further review and handling.

3.3.6 Government, Congressional and Media Inquiries

The Consumer Assistance Center will refer inquiries and complaints from federal and state government officials, members of Congress, and the media to NCUA's Office of External Affairs and Communications (OEAC). The DOCA Director or Program Officer will approve all communication sent to OEAC.

Congressional Complaints

A congressional correspondence is any correspondence that originates via a state or federal congressional office. Congressional complaints may be received by the CAC, the NCUA Office of External Affairs & Communication (OEAC) or through another NCUA office. If OEAC receives the complaint, the office then forwards this letter to the CAC point of contact to process the complaint in the same manner as consumer complaints are processed. CAC only reviews congressional complaints for which NCUA has jurisdiction over. The CAC point of contact, as designated by the DOCA Director, will gain concurrence from the Program Officer before determining a Congressional complaint is not in purview. Complaints not in purview will be forwarded to the OEAC point of contact with notification the complaint is not within CAC purview.

If a congressional complaint is sent directly to the CAC, CAC staff should refer the complaint to the CAC point of contact. The CAC point of contact will forward the complaint to the OEAC point of contact so they can acknowledge the complaint with the correct office. Upon acknowledgement from the OEAC point of contact, the CAC point of contact will process the complaint through the CAC.

Note: CAC staff should not discuss Congressional complaints with the constituents. If a constituent calls regarding their complaint, staff must refer the call to OEAC.

3.3.7 Field of Membership, Chartering, Share Insurance, Elections, and Bylaws

The Consumer Assistance Center will refer calls, inquiries, and complaints regarding field of membership, chartering, election of officials, credit union bylaws, and share insurance matters to NCUA's Office of Credit Union Resources and Expansion (CURE). OCFP staff may also send an email with the callers contact information to the CURE mailbox, curemail@ncua.gov.

3.3.8 Freedom of Information Act (FOIA), Privacy Act Requests and Complex Federal Consumer Financial Protection Enforcement Actions

The Consumer Assistance Center will refer inquiries and complaints concerning FOIA, Privacy Act requests, NCUA regulations, legal opinions, and administrative orders to NCUA's Office of General Counsel (OGC). Additionally, the Consumer Assistance Center may consult with OGC concerning complex consumer financial protection matters handled by the Consumer Assistance Center. All communication with NCUA's FOIA Office and General Counsel will go through the DOCA Director.

3.3.9 Liquidations/Conservatorships/Mergers and Acquisitions

The Consumer Assistance Center will handle general questions about liquidated federal credit unions. However, the Consumer Assistance Center will refer inquiries and formal complaints concerning liquidated credit unions, checks issued by the Asset Management and Assistance Center (AMAC), real estate owned properties and unclaimed properties, etc., to AMAC. The Consumer Assistance Center will respond to the entity or consumer to acknowledge receipt of the inquiry or complaint.

3.3.10 Ombudsman

If the Consumer Assistance Center has issued a complaint appeal determination letter and the consumer specifically requests another review of the matter, the Consumer Assistance Center will refer the complaint to the NCUA Ombudsman. All information requested about a case received from the Ombudsman will be communicated through the DOCA Director.

3.3.11 Office of Inspector General (OIG)

The Consumer Assistance Center will refer inquiries or complaints concerning the economy, efficiency, and effectiveness of NCUA programs and operations (including concerns relating to fraud, waste and abuse) to the NCUA OIG. The Consumer Assistance Center will acknowledge receipt of the inquiry or complaint.

3.3.12 Threatening Calls and Complaints

Complaints, phone calls, or inquiries from consumers sometimes involve indications of threats to NCUA staff, credit unions, or other related parties. Upon identification of such threat, the specialist/analyst must alert the Program Officer and the DOCA Director. Through the DOCA Director, the Consumer Assistance Center will notify the NCUA's Office of Continuity and Security Management (OCSM) and provide relevant information for their review and handling.

3.3.13 Presidentially Declared Disasters

When a Continuity of Operations Event occurs and the Incident Management System is activated, the Consumer Assistance Center will handle general questions about affected credit unions, including operational status and basic share insurance inquiries. Questions that are more specific will be referred to the appropriate regional office for response.

3.3.14 Miscellaneous Complaints and Inquiries

The Consumer Assistance Center will refer all other inquiries and complaints not involving a federal consumer financial protection law or regulation matter to the appropriate NCUA office or government agency.⁵ The Consumer Assistance Center will acknowledge receipt of the inquiry or complaint.

3.3.15 Appraisal Complaints

An appraisal complaint involves an entity that has failed to comply with real estate appraisal independence standards. When filing an appraisal complaint, the consumer uses the NCUA's Interagency Appraisal Complaint Form. This form is designed to collect information necessary for the CAC to take further action on a complaint from an appraiser, other individual, financial institution, or other entities. The CAC forwards the complaint to the appropriate federal or state agency if the entity is not within the NCUA's jurisdiction to investigate.

Note: Staff must code all complaints that are appraisal-related as an appraisal complaint under "Edit Case" in Salesforce.

3.3.16 Fair Lending

The Equal Credit Opportunity Act (ECOA), 15 U.S.C. 1691 et seq., prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, or because an applicant receives income from a public assistance program or exercises rights protected under the Consumer Credit Protection Act. Regulation B,

⁵ Please note that this section does not include matters referenced in section 3.2, such as complaints involving customer service or disagreements over specific federal credit union policies and procedures not addressed by federal law or regulation; or matters involving contract disputes, undocumented factual disputes between a federal credit union and a member or matters that are the subject of a judicial order/opinion or pending litigation.

which implements ECOA, provides the substantive and procedural framework for fair lending enforcement under ECOA.

Other federal agencies have general regulatory authority over certain types of lenders, and they monitor creditors for their compliance with ECOA. ECOA requires these agencies to refer matters to the Justice Department when there is reason to believe that a creditor is engaged in a pattern or practice of discrimination which violates ECOA. These agencies also may refer to the Justice Department matters involving an individual incident of discrimination.

The Fair Housing Act, 42 USC 3601 et seq., prohibits discrimination in home mortgage loans, home improvement loans, and other residential credit transactions, based on race, color, religion, national origin, sex, familial status or disability. The Department of Housing and Urban Development has issued regulations under the Fair Housing Act, including regulations addressing fair lending issues. 24 C.F.R. Part 100, Subpart C.

If the CAC receives a complaint that alleges discrimination on a prohibited basis, such complaints should be referred to an analyst in the Consumer Compliance Policy Office for further analysis.

3.4 Consumer Assistance Center Complaint Process

3.4.1 Overview

The CAC complaint handling process involves two phases: (1) attempted resolution by the credit union, as appropriate, and (2) investigation by the CAC, when necessary. The CAC provides credit unions with 60 days to resolve most consumer complaints before it intervenes. After the credit union adequately addresses and the CAC analyzes all issues associated with the complaint, the CAC notifies the consumer and the credit union with the outcome determination. If a complaint falls outside of the NCUA's authority, the CAC refers the complaint to the appropriate federal or state agency for handling and notifies the consumer of the referral.

3.4.2 Phase 1 - Attempted Resolution by the Credit Union

The CAC encourages consumers to first contact the credit union directly regarding their complaint. If the credit union cannot resolve the issue, the consumer can contact the CAC by completing the NCUA Consumer Assistance Form and submitting it through the web portal, fax or through the US Postal Service. If a complaint involves more than one issue or credit union, the consumer must submit separate complaint forms.

Within 10 business days of having the case assigned to the specialist, the specialist must determine whether the case involves a federal consumer financial protection law or a regulation within NCUA's authority or whether the CAC should refer the complaint to another regulatory agency. Before further processing, a CAC analyst checks the specialist's purview determination for accuracy. If the complaint involves a consumer protection law or regulation within the CAC's purview, the specialist will forward it with any documents to the chairman of the credit union's supervisory committee with a copy to the credit union's chief executive officer. The specialist will also send the consumer an acknowledgement email, which includes a unique case number and additional information about the complaint process.

The supervisory committee or audit committee will have the opportunity to review, and if appropriate, attempt resolution of the complaint within 60 calendar days of the date the CAC forwarded the letter. During this 60-day period, the CAC recommends the credit union attempt to resolve the complaint by reviewing the complaint; communicating directly with the consumer as needed and appropriate; and responding in writing to the consumer, with a copy to the CAC, referencing the case number and indicating whether the credit union has resolved the matter. The CAC will close the case when the credit union notifies it within 60 days that the matter has been resolved. However, the CAC may begin a formal investigation, which the NCUA refers to as Phase 2 of the complaint process as discussed below

3.4.3 Phase 2 - CAC Investigation

The CAC will begin a formal investigation in Phase 2 when: (1) the CAC does not receive any written response from the credit union within the 60-day timeframe; (2) the credit union notifies the CAC in writing that it has not resolved the matter with the consumer; or (3) the consumer disputes the resolution of the complaint by contacting the CAC in writing within 30 calendar days of the date of the credit union's response.

OCFP's consumer complaint processing system assigns cases to a consumer affairs analyst who reviews the case information and informs both the consumer and the credit union about the investigation process. The CAC analyst sends a letter to the supervisory committee with a copy to the credit union's CEO. The letter includes the consumer's original complaint and any documents provided by the consumer in support of the complaint; indicates that the CAC is investigating the complaint; and requests a written response to the CAC within 30 calendar days of the date of the letter. The analyst also sends a letter to the consumer indicating the CAC has begun an investigation of the complaint.

When the CAC receives the supervisory committee's response, the analyst reviews the response to ensure it adequately addresses issues raised in the complaint and that the action(s) taken, if any, are consistent with federal financial consumer protection laws and regulations. If the credit union did not address all of the consumer's concerns in its response, or if questions remain involving consumer financial protection issues, the analyst will request additional information or clarification from the credit union and notify the consumer that the investigation is still ongoing.

After the credit union adequately addresses and the CAC analyzes all issues associated with the complaint, the CAC analyst drafts a determination letter to the consumer and the credit union, which is forwarded to the Program Officer for quality control review and approval. As part of the review, the Program Officer ensures that the letter communicates a clear and accurate message to both the consumer and credit union. Once the Program Officer

approves the letter, the analyst sends the determination letter to the consumer and the credit union and closes the case.

3.4.4 Violations

During case investigations, the Consumer Assistance Center may find that a credit union violated a federal financial consumer protection regulation. When violations are identified, the NCUA enters the violations into the examination system of record, MERIT. This process ensures that the NCUA has an audit trail of evidence and documentation supporting the identified violation. Additionally, as corrective actions are recorded, the District Examiner can review any unresolved violations to determine if the necessary corrective actions have been taken to resolve those violations.



3.4.5 Appeals

Consumer Appeals

Consumers have the right to appeal the determination findings of their complaint. To appeal, the consumer must submit a written request within thirty (30) calendar days of the date of the determination letter.

Once the CAC receives an appeal from a consumer, the case owner/analyst should review the appeal to inspect for new information. If the appeal contains new information that would alter the original determination, the analyst should re-open the case. If the appeal does not contain new information and will not alter the original determination, the analyst should assign the case to the CAC Program Officer for review. If additional information is required for the CAC Program Officer to make a

determination, the CAC Program Officer may request that the analyst/specialist contact the consumer or credit union to request such information.

The Program Officer shall issue a written decision that states the reasons for the decision and provides written notice of the consumer's right to file a complaint with the NCUA Ombudsman, if they are not satisfied with the decision. The decision is provided to the DOCA Director for review and signature, and signed letters are returned to the case owner/analyst for sending.

Credit Union Appeals

Credit union-initiated appeals are rare; however, if a credit union wishes to appeal the determination, the credit union must submit a written request addressed to the Consumer Assistance Center or Division of Consumer Affairs Director requesting reconsideration of the determination within thirty (30) calendar days of the determination letter.

Once the CAC receives an appeal from a credit union, the case owner/analyst should create a task for the Program Officer to review the appeal. Within 30 calendar days after receiving a written appeal from a credit union, the Program Officer shall issue a written decision that states the reasons for the decision and informs the credit union of its right to file a request for review by the Director of Examination and Insurance, pursuant to 12 CFR § 706.106, or file an appeal with the Supervisory Review Committee, pursuant to 12 CFR § 706.107. If the Program Officer does not issue a written decision within 30 calendar days, the credit union's request for appeal shall be deemed denied.

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Chapter 4: Record Retention & System Integrity

4.1 SYSTEM OF RECORD (SOR)

OCFP's System of Record (SOR) is Salesforce. Salesforce is a secure cloud-based database that stores all the information related to a case, including documentation of the actions and communications made while investigating and responding to the inquiry or complaint. Salesforce interfaces the NCUA CAC Call Center software, to automatically create cases for telephone calls and voicemails. DOCA staff will copy the final determination letters, case analysis, and documents received from the credit union and the member to the S drive by charter number and member name.

4.2 Verizon Virtual Call Center (VCC)

Verizon Virtual Call Center (VCC) is a secure cloud-based Customer Experience Management (CEM) and interactive voice response (IVR) system that hosts the NCUA CAC Call Center (1-800-755-1030). Verizon VCC software routes callers through IVR prompts to answer the caller's question before reaching a CAC agent. All inbound calls are recorded.

4.3 System Administrator

The System Administrator is responsible for creating audit trail reports of Salesforce, reviewing access controls and permissions to ensure access allows for the least privilege, and applying a formal process to monitor the effectiveness of internal control reviews and timely remediation of internal control exceptions. Specifically, on a biannual basis, the System Administrator (or in this person's absence, the Director of CCPO) will examine a randomized sample consisting of at least 20 cases to assess the effectiveness of internal controls over the consumer complaint process. At the conclusion of the examination, the System Administrator will provide the

DOCA Director and the Director of OCFP with a report outlining the findings. The DOCA Director will take steps to remediate any internal control exceptions.

The System Administrator is also responsible for ensuring compliance with security and privacy controls that apply to federal information systems and organizations. Such activity would include for example implementing multifactor authentication for access to the System of Record and deploying automatic disabling of inactive user accounts in appropriate instances.

Chapter 5: Access to Consumer Complaints by Other NCUA Employees

5.1 Access to the Examiner Portal

The Examiner Portal facilitates the required pre-exam planning review of consumer complaints. It is the only method through which examiners can access complaint data. The portal allows examiners to securely review consumer complaints, credit union responses, supporting documentation about complaints, and consumer protection violations concerning the credit unions in their assigned regions. This information may help examiners identify potential areas of risk and make necessary adjustments to the exam scope.

Recorded and confirmed violations will be available to the appropriate examiner via both the Examiner Portal and the agency's examination system of record.⁶ In addition to recording violations within the Examiner Portal, the Consumer Assistance Center will upload confirmed violations to the system. This information is for review only and does not constitute a request for investigation into the documented violations by the reviewing examiner.

⁶ The NCUA is transitioning its examination system of record from AIRES to MERIT.

To become a registered user of the portal as designated by regional management, staff examiners can send a request to OCFP at consumeraffairs@ncua.gov.

5.2 Accessing Consumer Complaint Data – Regions

Each region has designated appropriate field staff and some office staff as authorized users of the Examiner Portal based on job duties. This is the only method through which regional staff can access complaint data. The portal provides secure access to consumer complaints, credit union responses, supporting documentation about complaints, and consumer protection violations concerning credit unions.

5.3 Accessing Consumer Complaint Data – Ombudsman

NCUA's Ombudsman also has access to the Examiner Portal based on job duties. The portal provides secure access to closed consumer complaints, credit union responses, supporting documentation about complaints, and consumer protection violations concerning credit unions.

Chapter 6: Privacy and Safeguarding Sensitive and Personally Identifying Information

6.1 Security of Sensitive Information

The Privacy Act of 1974 and the E-Government Act of 2002 require federal agencies to protect and secure personal information. The Federal Information Security Management Act of 2002 (FISMA) and subsequent Federal Information Security Modernization Act of 2014 require agencies to develop, document, and implement agency-wide programs to provide security for their

information and information systems, which include personally identifiable information (PII) and the systems on which it resides.

NCUA staff has access to sensitive information. NCUA must ensure this information is properly secured to prevent disclosure to unauthorized parties. In your role, you must comply with agency policies to secure NCUA issued laptops and mobile devices and sensitive information in your possession.

Hardcopy documents containing sensitive data must be properly secured and controlled.

6.2 Breach Reporting and Notification Policy

FISMA requires agencies to respond to breaches of PII in a timely manner. NCUA must report all potential and confirmed cyber incidents involving PII to the U.S. Computer Emergency Readiness Team (US-CERT). Additionally, NCUA will notify other external entities as appropriate (e.g. law enforcement).

6.3 Rules and Consequences for Safeguarding Personal Identifying Information

NCUA will hold employees, supervisors, and managers accountable for safeguarding personally identifiable information. Corrective action may be taken for failure to follow the rules regarding safeguarding personally identifiable information. See below document for further details.

6.4 Sensitive Information Received by the Consumer Assistance Center

The Consumer Assistance Center may receive sensitive PII from consumers and credit unions while handling an inquiry or complaint. However, NCUA does not request this information from consumers and discourages the submission of such PII via disclaimers published on the Consumer Assistance Center's website, MyCreditUnion.gov, and on the Consumer Assistance Center portal in complaint and inquiry forms. NCUA must destroy any non-relevant PII received by the Consumer Assistance Center if received electronically or

return it to the sender via a secure courier if it is an original document, pursuant to NCUA's record retention and secured data guidelines.

6.5 Freedom of Information Act and The Privacy Act

The Freedom of Information Act (FOIA) is a federal statute that allows any person to obtain records of a federal agency. The agency may only withhold records that are exempt from disclosure by FOIA. The Consumer Assistance Center receives FOIA requests from the General Counsel's Office if the request for information pertains to documents maintained or handled by the CAC. The CAC will provide documents and information in accordance with instructions provided by the General Counsel's Office in responding to any FOIA request.

The Privacy Act of 1974 (PA) is a federal law that requires agencies to give public notice of any record keeping systems that are used to keep information about people, which the agencies retrieve by the individual name or other personal identifier. As required by the E-Government Act of 2002, NCUA makes privacy impact assessments (PIAs) available to the public.

6.6 Other Privacy Considerations

6.6.1 Call Verification

When accepting incoming calls regarding consumer complaints, agents must verify the caller's phone number, name, and address. If the caller is not able to verify requested information, the agent shall notify the caller that due to privacy issues, no information can be given regarding the complaint.

In addition, under no circumstance should CAC staff give extra case details or reveal PII relevant to a complaint. Such information is only to be given or verified by the complainant when requesting a status update on a case. CAC staff will not provide the last name of a case owner to a caller.

6.6.2 Communicating with Personal Representatives

DOCA staff has an ethical responsibility to communicate and send relevant correspondence to a consumer that has indicated they have a personal representative. When communicating with a personal representative regarding an open case, please utilize call verification procedures as described above.

6.6.3 Sharing Case Information with Callers

When sharing information with callers, it is important to remember that internal Agency policies or case notes should never be shared with the caller. Information contained in a case is considered proprietary information unless it is released as part of a FOIA or Privacy Act request. Specific case details that cannot be shared include personal identifying information, credit union responses to a phase two investigation, case analysis information, and information contained in final determination letters.

6.6.4 Sharing Case Information with Credit Unions

When sharing information with credit unions, it is important to **only** share information that is included in the complaint with the credit union specified in the complaint. If a member or specialist selects the incorrect credit union in the Phase I process, which results in information being shared with the wrong credit union, then the specialist must contact the credit union and ask that they delete the complaint email, its attachments, delete any saved record from the complaint from the credit union's hard drive, shred any printed documents and send an email back to the DOCA staff member confirming that the credit union completed these actions. The DOCA staff member will send an email notifying the DOCA Director of the breach and destruction of the member's records by the credit union.

Chapter 7: Effective Communication and Customer Service

7.1 The Plain Writing Act

The Plain Writing Act (Public Law 111-274) was signed into law by the President on October 13, 2010. The Act, which applies to the NCUA, is intended “to improve the effectiveness and accountability of Federal agencies to the public” by promoting clear Government communication that the public can understand and use.

The Act requires that Federal agencies prepare certain documents intended for the public according to plain writing guidelines. Covered documents include documents relating to agency benefits and services and compliance with agency laws and regulations. They include both paper and electronic versions of documents such as letters, publications, forms, notices, and instructions.

The NCUA is responsible for ensuring that agency personnel prepare documents intended for the public according to plain writing guidelines. Agency personnel are trained to use plain writing guidelines and their documents are reviewed for compliance with these guidelines. The plain writing guidelines used by NCUA personnel can be found at PlainLanguage.gov.

7.2 Customer Service

CAC staff perform at a high level of customer service consistent with their job responsibilities and represent the NCUA in a manner consistent with the Agency’s mission to provide a safe and sound credit union system which promotes confidence in the national system of cooperative credit. A helpful, professional, and friendly voice on the phone can build consumer confidence. CAC staff extend common courtesies to callers to create a reputation of legendary customer service.

Note that all incoming calls are recorded. CAC staff should use their best judgment in interactions with the public. Remain neutral and professional.

7.3 Solicitation of Feedback

CAC is committed to providing excellent customer service to external stakeholders and will seek opportunities to solicit input from consumers and credit unions concerning their experience with the complaint process. Each determination letter that is drafted at the end of the complaint process and sent to the consumer and credit union, should include the following language:

The NCUA's Consumer Assistance Center is committed to providing excellent customer service and welcomes any feedback you may have concerning your experience with the Consumer Assistance Center's complaint process. Please send your feedback to:

National Credit Union Administration
Consumer Assistance Center
Attn: External Stakeholder Feedback
1775 Duke St., Alexandria, VA 22314-3418

The Program Officer will review feedback as it is received, and on a quarterly basis, compile and provide such feedback to the DOCA Director. The Director will evaluate and use the feedback, as appropriate, to improve the NCUA's consumer complaint program.

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Chapter 9: Financial Literacy and Outreach Programs

Program Overview

The Financial Literacy and Outreach (FLO) Programs involve the coordination of financial literacy and outreach policies (e.g. financial institution youth savings guidance), outreach products (e.g. videos, brochures, articles, infographics, social media content), supporting national financial literacy awareness campaigns, developing and executing MOUs/partnerships/collaborations, recommending and conducting research initiatives, recommending and developing performance measures and program evaluation policies and other efforts. Coordination and implementation is facilitated across the Agency including 2 OCFP divisions as well as the Public and Congressional Affairs, Office of Minority and Women Inclusion (OMWI), Regional, and Credit Union Resources and Expansion (CURE) offices.

The NCUA's full-time Financial Literacy and Outreach Analyst is the primary manager of all such efforts and also provides financial literacy subject matter and policy expertise on a range of consumer financial protection and financial literacy issues Agency-wide. Specifically, the NCUA's FLO Programs are designed to help implement and support the following:

- Administer related provisions of The Federal Credit Union Act –support and promote credit unions' statutory mission to promote thrift, responsible credit use and education among members.

- Statutory mandate of serving on the Financial Literacy and Education Commission (FLEC) and agency policy to actively participate in FLEC meetings.
- Implement related provisions in the NCUA's Annual Performance Plan and Strategic Plans.
- Educate credit unions and consumers about federal consumer financial protection issues.
- Support credit unions in their efforts to offer essential products and services, including financial education programs to all eligible members.
- Enhance communication with consumers and credit unions on consumer complaints.
- Collaborate with the other federal regulatory agencies as appropriate to protect consumers using credit union products and services.
- Use available NCUA delivery channels to promote consumer financial protection education.
- Engage with the credit union industry about consumer financial protection and compliance matters and the use of NCUA's financial literacy tools.
- Promote the value of diversity and inclusive financial services in credit unions.
- Support the U.S. National Strategy on Financial Literacy.
- Support Executive orders directing federal agencies to improve the financial literacy of Americans.
- Carry forward the longstanding tradition (over 80 years) of the NCUA (and its predecessor agencies) supporting the efforts of credit unions to provide member education and access to credit union services.



Legal Authority

The Federal Credit Union Act emphasizes that the role of federally insured credit unions is to promote thrift and productive credit use and provides the basis for NCUA's financial literacy initiatives. The NCUA has long been

committed to providing consumers with financial literacy and educational materials to help them make informed financial decisions. The NCUA encourages the credit union industry to participate in several broad categories of financial literacy activities, including financial counseling, asset building programs, financial literacy workshops and seminars, in-school branches, homebuyer counseling and credit management and repair.

As per the NCUA's Office of General Counsel, the legal authority for the NCUA's financial literacy and outreach programs are established in the Federal Credit Union Act, Presidential Executive Orders, Fair and Accurate Credit Transactions Act, agency policies, and other official directives that mandate the agency to promote financial literacy and economic well-being of all consumers especially those of modest means. The NCUA's financial literacy authority is outlined in the April 24, 2014 Office of General Counsel memo with the subject "Agency Authority Regarding Financial Literacy Initiatives" to NCUA Board Member Rick Metsger.

THE FEDERAL CREDIT UNION ACT SETS OUT CERTAIN NCUA BOARD'S POWERS IN 12 USC §1766(F)(2)

(A)The Board is authorized to conduct directly, or to make grants to or contracts with colleges or universities, State or local educational agencies, or other appropriate public or private nonprofit organizations to conduct, programs for the training of persons engaged, or preparing to engage, in the operation of credit unions and in related consumer counseling programs, serving the poor. It is authorized to establish a program of experimental, developmental, demonstration, and pilot projects, either directly or by grants to public or private nonprofit organizations, including credit unions, or by contracts with such organizations or other private organizations, designed to promote more effective operation of credit unions, and related consumer counseling programs, serving the poor. [emphases added]

THE FEDERAL CREDIT UNION ACT IN 12 USC §1752(1)

Additionally, The Federal Credit Union Act in 12 USC §1752(1) makes clear federal credit unions were organized for, among other things, promoting thrift among members and creating a source of credit for productive purposes. NCUA ensures credit unions operate in accordance with this provision as the administrator of the Federal Credit Union Act.

This statutory authority forms the bases for NCUA's current financial literacy initiatives. The NCUA, acting alone or in conjunction with credit unions, can partner with national and local organizations, such as schools, non-profits, and other consumer-focused groups to offer workshops and distribute outreach materials. OGC found no evidence of delineated limitations to this statutory authority. OGC notes the White House issued guidance through Executive Orders involving financial literacy and capability (Executive Orders 13455, 13530, 13646). The NCUA Board Members serve in their official capacities on financial initiatives, such as the Financial Literacy and Education Commission and NeighborWorks® America. The NCUA also participates in an interagency partnerships and other collaborations. The NCUA also collects data through the 5300 Call Report process on financial education services and inclusive financial services offered by credit unions.

In support of the NCUA's statutory requirement and commitment to advance financial literacy, the NCUA works to engage stakeholders at local, state, and national levels through outreach events targeting credit union officials, consumers, caregivers, educators, and other relevant groups. The NCUA develops financial literacy tools and resources aimed at educating consumers, especially underserved and vulnerable populations of various demographics. The NCUA is also responsible for educating consumers about financial services, consumer financial protection, and fair lending laws. The NCUA provides these tools and information through various methods, including NCUA websites, social media, videos, webinars, articles, brochures, financial literacy fairs and various outreach and stakeholder engagement events. The NCUA also works to ensure federally insured credit unions provide a variety

of responsible financial services designed to meet the particular needs of their fields of membership.

Policy Statement

Under the Federal Credit Union Act, promoting financial literacy is a core credit union mission. While credit unions serve the needs of their members and promote financial literacy within the communities they serve, NCUA works to reinforce credit union efforts, raise consumer awareness and increase access to credit union services. The NCUA also participates in national financial literacy initiatives and collaborations, including the Financial Literacy and Education Commission, an interagency group created by Congress to improve the nation’s financial literacy and education.

Key Terminology


	DESCRIPTION
FINANCIAL LITERACY	The ability to make informed judgments and to take effective actions regarding a person’s current and future management of money.
FINANCIAL CAPABILITY	The capacity, based on knowledge, skills, and access, to manage financial resources effectively ⁷ .
FINANCIAL WELL-BEING	Financial well-being has four broad characteristics, consumers feel in control of their day-to-day and month-to-month finances, they have the capacity to absorb a financial shock or emergency, they are able to stay on track to meet financial goals, and they have the financial freedom to make choices to enjoy life.

⁷ United States Department of the Treasury. Amended Charter: President’s Advisory Council on Financial Capability. Washington, DC: Department of the Treasury, 2010. <http://www.treasury.gov/resource-center/financialeducation/Documents/PACFC%202010%20Amended%20Charter.pdf>.

FINANCIAL INCLUSION	Individuals and businesses have access to useful and affordable financial products and services that meet their needs – transactions, payments, savings, credit and insurance – delivered in a responsible and sustainable way.
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Program Implementation Components

FUNCTION	DESCRIPTION
PLANNING & POLICY DEVELOPMENT/ADVISING	Advising the OCFP Director, Deputy Director, the NCUA board and other NCUA offices on financial literacy initiatives and national financial literacy priorities (e.g. Youth Savings Guidance, FLEC Reform Initiative). Providing well-researched and comprehensive approaches and solutions. Additionally, financial literacy and outreach provides the framework for an annual plan by which agency goals, partnership objectives, and FLEC initiatives are fulfilled.
FLEC/NATIONAL STRATEGY	Representing the NCUA, its interests and policies on the Financial Literacy and Education Commission. Participating in FLEC and other agency MOUs and collaborations on developing policies that advance financial literacy and access to federally-insured financial services.
FLEC/NATIONAL STRATEGY	Attending, participating or hosting webinars, social media events, meetings, conferences and other events to engage with intermediary stakeholders (e.g. educators,

	<p>credit union officials and financial literacy professionals). Managing the NCUA's collaborations with entities such as consumer groups.</p>
	<p>Coordinating the agency's participation in national financial literacy initiatives (e.g. America Saves, Military Saves, and National Financial Capability Month) and social awareness campaigns (e.g. Facebook Live, Twitter Chats). Enhancing consumer engagement metrics, tools and resources.</p>
	<p>Developing direct-to-consumer resources such as website content, information graphics, interactive learning tools, videos, brochures, articles, online knowledge-base content and games.</p>
	<p>Producing reports and research on financial literacy and consumer financial protection trends and developments (e.g. Credit Union Profile, Google Analytics). Recommending areas for research.</p>

Planning & Policy Development/Advising

Each year, the Financial Literacy and Outreach and MyCreditUnion.gov program managers are required to develop and submit a strategic action plan to implement all of the aforementioned responsibilities and priorities. The plan covers at least one calendar year and provides updates involving various consumer trends in financial literacy and consumer financial protection.

Additionally, throughout the year, staff meet on a regular basis to discuss performance and planning of all the NCUA's platforms.

Financial Literacy & Education Commission/National Strategy

The Financial Literacy and Education Improvement Act created a commission to streamline, improve, or augment the financial literacy and education programs, grants, and materials of the Federal government, including curricula for all Americans. 20 U.S.C. 9701 et seq.



The Financial Literacy and Education Commission (FLEC) is comprised of more than 20 federal agencies, including the NCUA, and chaired by the U. S. Department of the Treasury and vice chaired by the Bureau of Consumer Financial Protection. The FLEC developed the U.S. National Strategy on Financial Literacy, the agency's Financial Literacy and Outreach Analyst manages policy coordination on FLEC and ensures the NCUA complies with



the U.S. National Strategy.

Stakeholder Engagement

Through the Financial Literacy and Outreach Analyst, the agency is represented on interagency working groups, task forces, and committees, at conferences and other events involving financial literacy and outreach

matters. Coordination ensures the NCUA and credit unions are represented appropriately during policy discussions and development of national or federal financial literacy initiatives. Some examples of core interagency coordination include:

- **American Savings and Education Council Government Interagency Group**

A nonprofit organization and national coalition of public and private sector institutions focused on savings and retirement planning.

- **Department of Defense Financial Readiness Roundtable**

OCFP supports the DoD Financial Readiness and Consumer Policy programs. Including support of the DoD Financial Readiness Pillars and supporting campaigns, initiatives, and programs related to financial education and consumer affairs.

- **Consumer Protection Partner Calls**

OCFP collaborates with the Federal Trade Commission on a variety of consumer protection matters concerning financial literacy.

- **Advisory Committee on Economic Inclusion (ComeE-IN)**

The Advisory Committee on Economic Inclusion (ComeE-IN) was established by Chairman Sheila C. Bair and the FDIC Board of Directors pursuant to the Federal Advisory Committee Act. The Committee was chartered in November 2006. The Committee is to provide the FDIC with advice and recommendations on important initiatives focused on expanding access to banking services by underserved populations. This may include reviewing basic retail financial services such as check cashing, money orders, remittances, stored value cards, short-term loans, savings accounts, and other services that promote asset accumulation by individuals and financial stability.

- **Department of Education and Federal Deposit Insurance Corporation**

The Department of Education, FDIC, and the NCUA signed an agreement in November 2010 designed to encourage partnerships between schools, financial institutions, federal grantees, and other stakeholders to educate students about saving, budgeting and making wise financial decisions.

- **Jump\$tart Coalition National Partner**

The Jump\$tart Coalition is an organization of organizations that share a common interest in supporting financial literacy, through financial education, for our nation's youth. Coalition partners are corporations and financial institutions, non-profit organizations and associations, post-secondary institutions, and agencies of the federal government.

Consumer Engagement

The NCUA participates in several partnerships and initiatives that encourage and empower consumers to make smarter financial decisions. Many of the outreach efforts are national, collaborative campaigns composed of government and private entities. Examples of some of our past partnerships and events we have been involved with are:

- America Saves Week
- American Savings Education Council
- Annual Conference on Financial Literacy
- Financial Literacy Month
- Education-NCUA-FDIC Partnership
- Financial Literacy and Education Commission
- Governmental Affairs Conference
- International Credit Union Day
- Military Saves Week
- Money Smart Week
- National Credit Union Youth Week
- National Consumer Protection Week

- Financial Literacy Day on Capitol Hill
- Financial Literacy Leadership Conference
- National Strategy on Financial Literacy
- National Savings Forum
- USDA Cooperative Day

Product Development

The financial literacy and outreach analyst advises the NCUA, and works with other agencies and NCUA offices, on developing direct-to-consumer resources such as website content, information graphics, interactive learning tools, videos, brochures, articles, online knowledge-base content and games.



This process includes advising leadership the most appropriate communication, branding and consumer engagement strategies. When collaborating with other offices, the originating office is responsible for ensuring that all data and information used in the product is accurate, up-to-date, and reviewed and approved by the contributing office(s) or subject-matter expert(s). Originating offices should also ensure that the data and information presented in the product is consistent with data presented in other public documents issued by the Agency.

Examples of products developed by OCFP and in collaboration with other offices or agencies are below:

- **Infographics**

One of the more popular ways to publish large amounts of data in a consumer friendly format is to create an infographic. In OCFP we create 1-2 infographics a year that focus on topic that of national prominence in the financial literacy arena. For example, youth savings was the focus of the FLEC in 2017 and OCFP created an “Empowering Youth to Save” infographic to support those efforts.



Developing healthy financial habits early

Long-term healthy money habits begin to develop in childhood and preschool

- **Publications, Articles & Information Graphics**

Official agency publications exclusively produced by OCFP include 10 publications currently available to the public. This includes the NCUA’s flagship Your Insured Funds and How Your Accounts Are Federally Insured brochures. These brochures along with other Agency consumer publications underwent a major redesign in 2013. Financial literacy and outreach is responsible for development, production and coordination of official OCFP financial literacy deliverables. Official printed distribution of brochures are facilitated through OCFO’s distribution center. Currently only the Your Insured Funds and How Your Accounts Are Federally Insured brochures are available for bulk orders through the NCUA.



In 2017, the agency launched 6 new publications the NCUA Consumer Assistance Center, NCUA consumer financial protection and financial literacy resources, how to start saving, sending money overseas (remittances), share insurance coverage overview and the benefits of credit union membership.

OCFP also contributes to consumer focused articles for the Agency’s official newsletter “The NCUA Reports”, as well as articles, and blog or social media posts for external publications. The materials are developed within OCFP and

then assessed through pertinent offices such as OEAC or OGC for compliance and quality assurance.

- **Video Production**

The NCUA Consumer Reports and NCUA Consumer Protection Update series intends to inform credit unions and their members about important consumer financial protection matters in a visually engaging format through video. The Consumer Protection Update series is designed to be slightly more technical with content for credit union volunteers and managers. The Consumer Report series is targeted toward the average consumer and covers a range of consumer financial services topics. Financial literacy and outreach works with relevant OCFP Divisions and NCUA Offices to develop scripts ensure scripts comply with agency standards.



The screenshot shows the YouTube channel page for 'NCUA Consumer Reports'. On the left, there is a video player with a 'PLAY ALL' button and a channel logo featuring the U.S. Capitol and the NCUA logo. Below the player, the channel name 'NCUA Consumer Reports' is displayed, along with '12 videos • 8,871 views • Last updated on Dec 29, 2017'. A 'SUBSCRIBE' button is visible. On the right, a list of five video thumbnails is shown, each with a number, a title, a channel name, and a duration:

- 1. Is a Credit Union Right for Me? (3:12)
- 2. NCUA Consumer Report: Understanding Payday Loans (6:30)
- 3. NCUA Consumer Report: Scams Targeting Seniors (4:05)
- 4. NCUA Consumer Report: Sending Money Internationally (4:33)
- 5. Informe al consumidor de la NCUA: como enviar dinero al exterior (4:32)



- **Social Media & Interactive Multimedia**

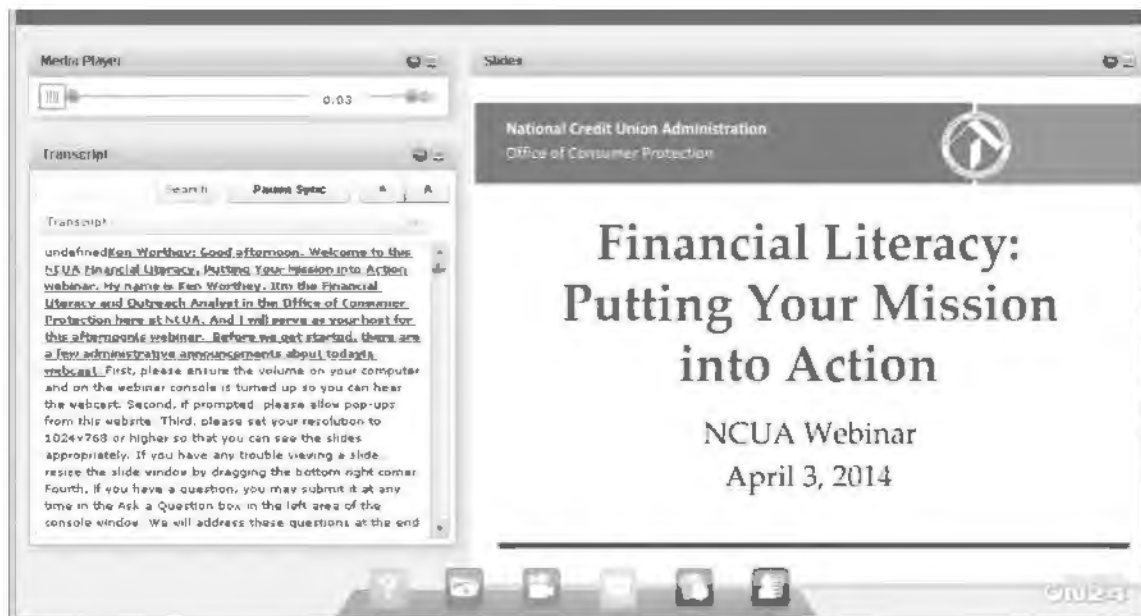
Through financial literacy and outreach OCFP ensures each OCFP divisional program and other relevant Agency programs receive exposure through OCFP coordinated initiatives online and through social media. Examples of this include NCUA Twitter Chats which began in 2014 and Facebook Live which began in 2018. These chats enable the NCUA to reach millions of social media users, helping to foster collaboration within the credit union industry around credit union and financial literacy related topics. In addition the showcasing resources from other federal agencies, OCFP is also able to showcase the NCUA's financial literacy resources and programs such as share insurance coverage, new videos, information graphic and MyCreditUnion.gov.



- **Webinars (suspended in 2017, projected relaunch 2019)**

OCFP conducts webinars on financial literacy related issues for the credit union industry and consumers (suspended in 2017). The webinars will usually feature remarks from the OCFP Director and include appropriate internal or external experts to present on topics important to the nation, credit unions and consumers. Financial literacy and outreach analyst develops

the webinar's program and script by working with SMEs, contractors, and others to ensure the webinar is relevant for the consumer and industry. Webinars are also used to promote the agency's mandated financial literacy responsibilities to the public and to promote credit union's statutory mission to promote thrift and responsible credit use among members.



Data, Research & Reporting

The Financial Literacy and Outreach Analyst leads efforts to analyze call report data, NCUA Consumer Assistance Center data and other data sets from across the federal government, non-profits and others to inform the financial literacy policy efforts of the NCUA, including strategic planning.

The NCUA collects quarterly 5300 Call Report information on financial education services from credit unions. Since June 2009, as recommended in the NCUA Member Service Assessment Pilot Program, the 5300 Call Report has collected the following financial literacy program activities: financial literacy workshops, financial counseling, in-school branches and first-time homebuyer workshops. By analyzing the data collected through the 5300 Call Report, the NCUA is able to identify current financial literacy efforts. This data is available in Appendix G. Listed below are the 5300 Call Report definitions related to credit union financial education services:

- Financial Counseling – Offer programs designed to help individuals make the best use of their financial assets and achieve specific economic objectives, such as adequate funding of a child's college education expenses, or post-retirement needs. This can include assistance with budgeting and debt management.
- Financial Education – Offer programs focusing on building basic money management skills which lead to an understanding of financial services, personal finance, savings, and the importance of good credit.
- Financial Literacy Workshops – Offer regular workshops to try to help members improve their knowledge of financial issues.
- In-School Branches – This applies if you maintain branches in schools to promote financial education, knowledge of the credit union system and thrift to the students of the school. These branches are usually run by the students. If your branch is run solely to serve the faculty and staff of the school, this item does not apply.
- First Time Homebuyer Programs – Offer special counseling or education to assist members with the purchase of their first home.

As part of these efforts, the financial literacy and outreach analyst may provide suggested updates to the call report or suggest to the NCUA Board opportunities to fund additional data collection initiatives, research projects or other initiatives to address areas of concern or need for additional investigation.

UPDATE: In January 2018, the NCUA announced a public comment period for changes to the NCUA 5300 Call Report and Credit Union Profile. The suggested enhancements involving financial capability include seeking additional information from credit unions about in-school student run credit union branches, online financial literacy efforts, credit management and repair education and youth savings accounts and programs (including custodial and non-custodial accounts).

Financial Inclusion

Financial inclusion is the pursuit of access to affordable and responsible financial services for all individuals. Financial inclusion helps consumers build financial security and improves their long-term financial prospects. Over 8 million households in the United States are unbanked, meaning that no one in the household has a credit union or Bank account. Over 24 million households are underbanked, meaning that the household has an account at a credit union or bank but may supplement with reliance on alternative financial services, such as non-bank check cashers and auto title loans. According to the U.S. Department of the Treasury, 31 percent of households in the U.S. are “struggling to get by.”

Access to affordable and responsible financial services helps consumers build financial security and improve their long-term financial prospects. It also enables individuals and businesses to transfer money, make payments, manage income volatility, save for specific financial goals, access credit, and insure against risks. Unfortunately, low-income, underserved and unbanked consumers are especially vulnerable to exclusion from basic and traditional financial services, including access to affordable credit counseling.

Given their mission, credit unions are uniquely positioned to help members improve their financial well-being. NCUA’s OCFP supports and encourages access to financial literacy and other financial services through credit unions via its financial literacy and outreach functions.

Program History

The NCUA and credit unions have worked together to expand access to financial literacy services to consumers. The NCUA encourages credit unions to promote thrift and credit use for provident or productive purposes. The NCUA provides the opportunity for parents, educators, practitioners, credit unions, and the general public to receive financial literacy tools and information from the agency directly.

The NCUA also engages in collaborations and partnerships with government, non-profit, and private stakeholders to advance financial literacy efforts of the

federal government and credit union industry. Finally, the NCUA reviews data and information collected by the agency and other sources to analyze consumer trends and information consumption patterns to ensure the agency is appropriately communicating relevant messages and using the right communication tools.

For over 70 years the NCUA and its predecessor agency (the Bureau of Federal Credit Unions) significantly contributed to credit union member education efforts by creating programs and initiatives that supported, reinforced, and increased consumer awareness and access to credit union services. Below is a timeline of NCUA’s high-level financial literacy efforts from past to present.

The NCUA Financial Literacy Programs Timeline 1940 - 2018

YEARS (Approx.)	STATUS	NAME
1940 - present	Active	Informational Programs ⁸
1962 - 1978	Defunct	Thrift Honor Awards Program ⁹
1966 - 1970	Defunct	Project MoneyWise ¹⁰
1979 - present	Active	Community Development Revolving Loan Fund Grants ¹¹
2001 - 2007	Defunct	Access Across America Initiative ¹²
2003 - present	Active	Financial Literacy and Education Commission (FLEC) Established ¹³ - NCUA is a member of the commission by statute
2004 - 2005	Defunct	Partnering and Leadership Successes (PALS) ¹⁵

⁸ Social Security Administration, Bulletin 1948

⁹ U.S. Department of Health, Education, and Welfare, Federal Credit Union Program Annual Report 1965

¹⁰ Social Security Administration, Project Moneywise

¹¹ National Credit Union Administration, Community Development Revolving Loan Fund Footnotes to Financial Statement: April 30, 2008

¹² NCUA Letter To Federal Credit Unions 03-FCU-04

¹³ Financial Literacy and Education Commission, Resource Center

2006	Completed	Member Service Assessment Pilot, Includes Financial Literacy Survey ¹⁴
2006	Completed	Outreach Task Force, Recommends Financial Education Services Data Collection Via 5300 Call Report/Credit Union Profile ¹⁵
2006 - 2007	Completed	NCUA Appointed Chair of FLEC's MyMoney.gov Website Committee ¹⁶
2007	Completed	NCUA Supports BizKids PBS Television Education Program, Funded by Credit Unions – Chairman Appears in Episode Introduction ¹⁷
2007 - 2009	Defunct	The Resource Connection ¹⁶
2008	Defunct	NCUA Online Financial Literacy Library ¹⁶
2008 - present	Active	Share Insurance Consumer Assistance Hotline and Toolkit Launched ¹⁸
2009	Defunct	NCUA Share Insurance TV Ad Campaign Launched, Featuring Finance Expert Jane Bryant Quinn
2010	Defunct	NCUA Keep Your Money NCUA Safe Campaign Launched Featuring Finance Expert Suze Orman, Campaign Materials and Online Widgets Made Available ¹⁹
2010 - present	Active	U.S. Department Of Education, FDIC, and NCUA Financial Access and Financial Education Collaboration Agreement Initiated ²⁰

¹⁴Member Service Assessment Pilot Program 2006, A Study of Federal Credit Union Service

¹⁵NCUA Outreach Task Force

¹⁶Statement Of The Honorable Joann M. Johnson Chairman National Credit Union Administration Before The Subcommittee On Financial Institutions And Consumer Credit U.S. House Of Representatives

¹⁷Statement of Joann Johnson, Chairman National Credit Union Administration on "Financial Literacy And Education: The Effectiveness of Governmental And Private Sector Initiatives" Before The House Financial Services Committee, April 15, 2008

¹⁸NCUA News January 2009, NCUA continues share insurance outreach

¹⁹NACFU 'Keep your money NCUA-safe' campaign is on, Oct.5, 2010

²⁰Financial Access And Financial Education Collaboration Agreement 2010

2010	Completed	NCUA Office of Consumer Protection Activated
2011	Defunct	Financial Education/Financial Literacy Initiative (CDRLF) Grants ²¹
2011	Active	MyCreditUnion.gov/Espanol.MyCreditUnion.gov – Financial Literacy & Consumer Financial Protection Website Launched ²²
2012 - present	On-duty	FTE Position Devoted to Managing Financial Literacy & Outreach Program
2013	Completed	Pocket Cents for All Ages and Hit the Road Game
2013 - present	Active	NCUA Consumer Report and Update Videos Launched
2014 - present	Active	NCUA Financial Literacy Webinar & Twitter Chat Series
2015	Completed	World of Cents Mobile Learning App Launched in Apple and Google Play App Stores
2015	Completed	Issued Interagency Guidance Encouraging Federally Insured Financial Institutions to Offer Youth Savings
2015	Completed	Released Interactive Information Graphic on “What is a Credit Union?”
2015 - 2016	Completed	MOU Signed with AARP to Promote Financial Literacy and Consumer Financial Protection
2016 - present		Expanded Collaborations with Federal Trade Commission (Fraud Prevention) and Federal

²¹ NCUA Letter To Credit Unions 11-CU-04

²² Matz Launches NCUA’s MyCreditUnion.gov

		Deposit Insurance Corporation (Youth Workforce Development)
2016-2017	Completed	OCFP Leadership Gives Keynote Address on Savings and Financial Literacy at Consumer Federation of America's National Savings Forum and National Youth Involvement Board's Conference
2018	Completed	Released Information Graphic on Empowering Youth to Save
2018	Completed	OCFP suggested enhancements to the NCUA 5300 Call Report and Credit Union Profile involving financial capability

Financial Literacy in the United States

On average, Americans are experiencing less financial stress and improved satisfaction with their financial condition.²³ However, large segments of society continue to face financial difficulties.²⁴ The financial difficulties of individuals and families can dramatically affect the financial health of local communities, and it is clear the financial well-being of individuals and families is fundamental to national financial stability.²⁵

²³ Financial Literacy and Education Commission, Promoting Financial Success in the United State: National Strategy for Financial Literacy 2016 Update

<https://www.treasury.gov/resource-center/financial-education/Documents/National%20Strategy%20for%20Financial%20Literacy%202016%20Update.pdf>

²⁴ 2 FINRA Investor Education Foundation, National Financial Capability Study: U.S. (July 2016), http://www.usfinancialcapability.org/downloads/NFCS_2015_Report_Natl_Findings.pdf.

²⁵ Financial Literacy and Education Commission, Promoting Financial Success in the United State: National Strategy for Financial Literacy 2016 Update

<https://www.treasury.gov/resource-center/financial-education/Documents/National%20Strategy%20for%20Financial%20Literacy%202016%20Update.pdf>

Given the increasingly complex financial choices facing Americans and disparities in many Americans' abilities to weather financial challenges, there is a critical need for effective financial education.²⁶

- Nearly one in five households report spending more than they earn (not including the purchase of a new home, car, or other big outlays).
- Nearly half of all households are not able to pay for an unexpected \$400 expense without having to borrow money or sell something.
- More than half of working Americans worry about running out of money in retirement.
- Around one in five non-retired adults indicated that they currently have no retirement savings or pension whatsoever.²⁷
- As of 2015, less than a third of American adults had been offered financial education at a school or work, and only one in five say they participated in financial education.
- Nearly one in five 15-year-olds failed to demonstrate more than a basic level of financial knowledge and skills on a rigorous assessment.

Other consumer issues such as predatory lending, high levels of consumer debt, and low savings rates have added to the sense of urgency surrounding financial literacy.

The Case for Financial Literacy

There is growing evidence that financial education – in a variety of forms and when appropriately matched to the specific need at hand – can have a meaningful impact on financial behavior and well-being. The field of financial education has evolved over the past several years. Practitioners continue to

²⁶ Financial Literacy and Education Commission, Promoting Financial Success in the United State: National Strategy for Financial Literacy 2016 Update

<https://www.treasury.gov/resource-center/financial-education/Documents/National%20Strategy%20for%20Financial%20Literacy%202016%20Update.pdf>

²⁷ Board of Governors of the Federal Reserve System, Report on the Economic Well-Being of U.S. Households in 2016, (May 2017), <https://www.federalreserve.gov/publications/files/2016-report-economic-well-being-us-households-201705.pdf>.

learn from a variety of approaches. Researchers aim to identify the educational approaches that are most effective and to understand which approaches are best matched to different consumer situations and needs. For example, there is growing evidence that well-designed and implemented high school personal finance mandates help prepare young people to successfully navigate their financial lives, yet only 17 states require high school students to take a course in personal finance.