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League InfoSight Highlights

Coming First Quarter 2025

For years, InfoSight, CU PolicyPro, and RecoveryPro have stood as leaders in their respective categories, each known for their unique functionality and industry-leading content. We've listened closely to credit union feedback and realized that the future is about creating a more unified experience – one where the strengths of our products come together in a way that not only amplifies their individual features but also creates new possibilities.

In Q1 2025, we will be unveiling InfoSight360, a groundbreaking product combination that brings together the best elements of our three flagship products into one seamless solution. Credit unions using any of our three products will be automatically migrated to InfoSight360 upon its launch.

This all-new offering promises to redefine how you interact with our technology, bringing comprehensive compliance information, policies, and business continuity planning (BCP) resources together in one place.

Stay tuned for more information about InfoSight360 and the upcoming launch schedule!

2025 NCUA Supervisory Priorities

The NCUA has set their <u>supervisory priorities</u> for 2025! NCUA's priorities are set each year based on where they see the highest risk to credit union members, the industry, and the Share Insurance Fund. Some trends include loan delinquencies and charge-offs at a

high point, return on average assets under pressure from the interest rate environment, and provision for loan and lease loss expenses increasing. That lead the NCUA to focus on these priorities for 2025:

1. Credit Risk.

- a. Examiners will review the credit union's lending and related risk-management practices. This will include loan underwriting standards, collection programs, Allowance for Credit Loss reserves, charge-off practices, management and board reporting, and management of any concentrations of credit risk.
- b. If the credit union outsources any lending, servicing, or collection functions, the examiners will be looking at **third-party risk management practices** related to those entities.
- C. Modification and workout strategies for borrowers experiencing financial difficulties, including assessing whether efforts were reasonable and conducted with proper controls and management oversight.

2. Balance Sheet Management and Risk to Earnings and Net Worth.

- a. Examiners will weigh current and prospective sources of earnings and the composition of net worth relative to the credit union's approved plans and thresholds.
- b. Examiners will consider current and prospective sources of liquidity compared to funding needs to determine the adequacy of the credit union's liquidity risk-management framework.
- C. Examiners will be reviewing the credit union's policies, procedures, risk limits, and evaluating the adequacy of the credit union's risk-management framework.

3. Cybersecurity.

- a. Examiners will use the <u>information security examination</u> procedures to assess the credit union's information security programs.
- b. The NCUA also encourages the credit union board of directors to prioritize cybersecurity as a top oversight and governance responsibility, as outlined in their previous letter <u>24-CU-02</u>.

4. Consumer Financial Protection.

- a. **Overdraft Programs** policies, procedures, disclosures, fees, account statements, member complaints, internal reviews, and websites. (*Policy 7215: Overdraft Protection*).
- b. **Fair Lending** policies and practices for identifying and mitigating potential discrimination in real estate valuation practices. (*Policy 7120: Fair Lending, Policy 7302: Real Estate Appraisals, 7302.10: Reconsiderations of Value*).
- c. **Home Mortgage Disclosure Act (HMDA)** data collection, reporting policies, practices, and transaction testing for applicable credit unions. (*Policy 9200: Regulation C: Home Mortgage Disclosure Act*).

- d. **Military Lending Act** policies, procedures, compliance management system, and checking/monitoring for military status. (*Policy 7213 Military Personnel Loans*).
- e. **Electronic Fund Transfer Act (Regulation E)** policies, procedures related to payments and error resolution. (2615.10: Electronic Fund Transfers, 2615.11: Real-Time Payment Options Risk and Controls, Error Resolution also addressed in product specific policies such as: Policy 2615: ATM or Debit Cards, Policy 2605: International Remittance Transfers, 7210.10: Credit Cards Program Procedures, etc.).

Many resources directly related to these supervisory priorities can be found within InfoSight, CU PolicyPro, and RecoveryPro to help credit unions prepare for their 2025 examination. If you need assistance, don't hesitate to reach out to your League/Association, or us directly at info@leagueinfosight.com.

Glory LeDu

CEO, League InfoSight & CU Risk Intelligence

News and Alerts!

- <u>Letter to Credit Unions (25-CU-02) Cyber Incident Notification Requirements Update to Letter 23-CU-07</u>
- <u>CFPB Withdrawals Proposed Rule on NSF Fees for Instantaneously Declined</u> Transactions
- <u>CFPB Finds Hundreds of Thousands of Mortgages in Southeast and Central Southwest US Likely Underinsured Against Flood Risk</u>
- <u>CFPB Sues Capital One for Cheating Consumers Out of More Than \$2 Billion in Interest Payments on Savings Accounts</u>
- CFPB Sues Experian for Sham Investigations of Credit Report Errors
- CFPB Seeks Input on Digital Payment Privacy and Consumer Protections
- <u>CFPB Proposes Rule to Ban Contract Clauses that Strip Away Fundamental Freedoms</u>
- CFPB Buy Now, Pay Later Use Among Borrowers with High Credit Balances

Questions, Comments, Concerns? We are here to help! Email us at info@leagueinfosight.com