



Credit Union Training Requirements

Below is a list of training requirements that are found in federal regulations and regulator guidance. This chart does not include any state or local training requirements that might exist.

Credit unions should not use this document as the sole source of information for its training program. In addition to specific training obligations, credit unions have a general obligation to make sure that they are in compliance with all applicable laws and regulations; this may require additional staff training.

This document is for informational purposes only, and does not constitute legal advice. If such advice is required, please consult with competent local counsel.

Topic	Citation	Description of Requirement
ACH Preliminary Risk Assessment and Scope Development	NCUA Examiner's Guide	A credit union must ensure employees responsible for ACH operations are trained on NACHA's rules. For ODFIs this should include initial and annual training on the requirements of NACHA rules regarding originations, including authorization, liabilities, warranties, etc.
Bank Secrecy Act/Anti Money Laundering	12 C.F.R. § 748.2(c)(4); NCUA Letter to Credit Unions 05-CU-09 and Enclosure	The formal regulatory requirement is to "(p)rovide training for appropriate personnel." The FFIEC BSA/AML Manual, however, expands upon this to indicate that training must be ongoing and, at a minimum, must reach all employees whose duties require knowledge of the Bank Secrecy Act. <i>See BSA/AML Examination Manual</i> . The Manual also states that credit unions must provide training for their boards of directors. In Letter to Credit Unions 05-CU-09, NCUA states the BSA training should be done annually.
Board of Directors*	NCUA Federal Credit Union Bylaws, Article VI, Section 6(d)	Federal credit unions must establish a policy to address training for directors and volunteer officials. The training should cover, at a minimum, ethics, fiduciary responsibility, regulatory compliance and accounting.
"Catch-all" Requirement	Chapter 7, NCUA Examiner's Guide, p. 7-14	The board must approve appropriate training for management and staff. The training should be appropriate for the credit union's size and complexity. Other regulations suggesting training include but are not limited to: Credit Practices Rule, E-Sign Act, Fair Credit Reporting Act, Fair Debt Collection Practices Act, Preservation of Consumer Claims and Defenses, Homeowner's Protection Act, Management Officials Interlocks, National Flood Insurance Act, Record Retention, Home Mortgage Disclosure Act, Home Mortgage Disclosure Act, Reserves For Transaction Accounts (Regulation D), Electronic Funds Transfer Act (Regulation E), Consumer Leasing Act (Regulation M), Regulation U, Real Estate



		Procedures Act (Regulation X), Truth In Lending Act (Regulation Z), Truth In Savings Act, and Bank Bribery Law.
Children’s Online Privacy Protection Act (COPPA)	16 C.F.R. § 312.5	Provide training to employees whose duties are affected by the requirements of the Children’s Online Privacy Protection Act.
Fair Lending	NCUA Fair Lending Guide p. 16, 35 47; NCUA AIRES Questionnaire and FFIEC Fair Lending Examination Procedures p. 15	NCUA’s Fair Lending Guide states credit unions should provide fair lending training “to all employees involved in any aspect of taking, evaluating, acting on a credit application, or furnishing/maintaining credit information. In addition, persons involved in marketing and credit operations should receive appropriate instruction relative to their responsibilities.” NCUA’s AIRES exam questionnaire for Regulation B specifies lending personnel should receive training on the requirements of the regulation “at least annually.” The Fair Lending Guide states that Fair Housing Act training is needed for those involved in “any aspect of residential real estate including financing, selling, renting, advertising, brokering, and appraising of housing.” The Guide also states that credit unions are expected to provide HMDA training to those employees whose duties are impacted by HMDA.
Financial Literacy*	Section 701.4(b)(3) and NCUA Letter to Federal Credit Unions 11-FCU-02	Within six months of election or appointment, directors must establish a working knowledge of basic finance and accounting practices, including the ability to understand the credit union’s balance sheets and income statements.
Information Security (Response Programs)	12 C.F.R. § 748, Appendix B, III.B.1	When credit unions issue member notices regarding unauthorized access to their member’s information, the credit union must have procedures in place, including trained personnel, to respond appropriately to member inquiries and requests for assistance.
Information Security (Security Program)	12 C.F.R. § 748, Appendix A, III. C.2; NCUA Letter to Credit Unions 06-CU-07 and Enclosure	Credit unions must train staff to implement its information security program. In Letter to Credit Unions 06-CU-07, NCUA explains that a “credit union should consider providing specialized training to ensure that personnel sufficiently protect member information in accordance with its information security program.” Staff should also be trained to properly dispose of member information.
Internal Controls	Chapter 7, NCUA Examiner’s Guide, p. 7-32	NCUA indicates that staff education and training on internal controls should be reviewed by examiners. Credit unions should implement training programs for staff in specific daily operations, as well as in credit union industry philosophy. Credit union



		training programs should meet management's needs and provide for cross-training staff.
Loan Originators	12 C.F.R. § 1026.36(f)(3)(iii) and commentary	Regulation Z requires periodic training on federal and state laws for loan originators. The commentary expands on this requirement by stating the training must be "sufficient in frequency, timing, duration, and content to ensure that the individual loan originator has the knowledge of State and Federal legal requirements that apply to the individual loan originator's loan origination activities. The training must take into consideration the particular responsibilities of the individual loan originator and the nature and complexity of the mortgage loans with which the individual loan originator works." Under the S.A.F.E. Act, states must require a certain amount of training before a loan originator receives or renews their licenses. <i>See</i> , 12 C.F.R. §§ 1008.105 ; 1008.107 .
Management Succession	Chapter 7, NCUA Examiner's Guide, p. 7-10	To ensure continuity of operations, credit unions need to have a management succession plan in place. The plan should include cross training of both management and staff to ensure necessary backup for vacant positions.
Personnel Management	Chapter 7, NCUA Examiner's Guide, pp. 7-13 – 7-14	The board must approve written personnel policies and training on, among other things, sexual harassment, violence in the workplace and dealing with the media. The scope of the policy and training should be appropriate for the credit union's size and complexity.
Privacy	NCUA Letter to Credit Unions 00-CU-02	All staff, including volunteers, should be trained on the credit union's security measures and privacy protection policies. The policies should be routinely reviewed and updated and follow-up training should be provided. Temporary and part-time employees, independent consultants and vendors should have information on, and be subject to, the written policies.
Red Flags/Identity Theft	Section 12 C.F.R. § 717.90(e)(3)	Each credit union must train staff to implement its Identity Theft Protection Program.
Regulation CC	12 C.F.R. § 229.19(f)	Credit unions must establish procedures to comply with the requirements of Regulation CC and must provide each employee who performs duties subject to the requirements of Regulation CC with a statement of the procedures applicable to that employee.
Reimbursement for Providing Financial Records (Regulation S)	NCUA Consumer Compliance Manual, pp. 287	A credit union must establish and maintain procedures to ensure its compliance with Regulation S. It must also provide a statement of applicable portions of the procedures to employees who perform



		tasks subject to the requirements of the regulation. Financial institutions must provide appropriate training to those employees who would be responsible for responding to financial record inquiries from government agencies.
Remote Deposit Capture Procedures	NCUA AIREs Questionnaire	NCUA's AIREs Questionnaire for Remote Deposit Capture Procedures states credit unions should establish a program to train all those involved with RDC activities.
Servicemembers Civil Relief Act (SRCA)	NCUA Consumer Compliance Manual, p. 198	A credit union must establish and maintain procedures to ensure its compliance with the SCRA. It must also provide a statement of applicable portions of the procedures to employees who perform tasks subject to the requirements of the SCRA.
Wire Transfer Internal Controls	NCUA Examiner's Guide	Credit unions must ensure employees within the wire transfer department receive initial training and annual training to reinforce the credit union's security and control policy.
* Only applies to federal credit unions		

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