

DATE: January 24, 2022
BULLETIN: 2022-KDCU-CUB-2
TO: Kansas Chartered Credit Unions
SUBJECT: NCUA 2022 Supervisory Priorities

NCUA 2022 SUPERVISORY PRIORITIES

On January 18, 2022, the National Credit Union Administration (NCUA) issued [Letter to Credit Unions 22-CU-02](#) outlining the supervisory priorities for 2022. Many of the priorities will look familiar as they appear regularly on the focus area lists of regulators. NCUA also provided program updates on MERIT and CAMELS in the letter.

NCUA lists 11 priorities; four (4) are highlighted below:

- **Information Security (Cybersecurity):** Cybersecurity risks represent an ongoing threat to the financial infrastructure of the United States. Specifically, ransomware, third-party/supply chain risks and business email compromises (BEC) remain a concern. NCUA has provided credit unions with the [Automated Cybersecurity Evaluation Toolbox \(ACET\)](#) in order to conduct a self-assessment.
- **Payment Systems:** New to the list this year, payment products, services and operations are a growing area of complexity and risk for credit unions and their members. Easy and fast electronic processing of transactions relies on technology, the applications and their controls, and the underlying security of the platforms facilitating the transactions. There will be an increased focus in this area due to the enhanced risk of fraud, illicit use and data security breaches.
- **Bank Secrecy Act and Anti-Money Laundering/Countering the Financing of Terrorism:** Bank Secrecy Act (BSA) and Anti-Money Laundering (AML)/Countering the Financing of Terrorism (CFT) remain national priorities as evidenced by the Anti-Money Laundering Act of 2020 (AMLA) and related regulations (to be released and implemented during 2022). It is imperative for all credit unions to have an appropriate BSA/AML program.
- **Consumer Financial Protection:** In 2022, focus areas will include the COVID-19 pandemic, fair lending, Servicemembers Civil Relief Act (SCRA), Fair Credit Reporting Act (FCRA) and overdraft programs.

The remaining priorities are Credit Risk Management, Capital Adequacy and Risk Based Capital Rule Implementation, Loan Loss Reserving (ALLL), Loan Participations, Fraud, London Inter-Bank Offered Rate (LIBOR) Transition and Interest Rate Risk.

NOTE: In accordance with Governor Laura Kelly's [guidance](#), KDCU Administrator [Vickie Hurt](#) continues to review the feasibility of resuming the on-site examination program. This is being done in coordination with the NCUA.