

2023

Office of Inspector General Annual Work Plan



OVERVIEW

The National Credit Union Administration (NCUA) Office of Inspector General (OIG) Annual Work Plan (Plan) for 2023 describes audits and other work that would most benefit the NCUA's mission. In formulating this Plan, we considered:

- The NCUA's Strategic Plan, Annual Performance Plan, and Diversity and Inclusion Strategic Plan
- Pertinent legislation, including the Federal Credit Union Act (FCU Act), the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), the Government Performance Results Act, the Chief Financial Officers Act of 1990, the Federal Information Security Modernization Act (FISMA), the Sarbanes-Oxley Act, the Privacy Act, the Government Charge Card Abuse Prevention Act of 2012, and the Inspector General Act
- Congressional activity and testimony by NCUA officials, as well as areas of significant interest to NCUA Board members and the Congress;
- Audits planned and performed by the Government Accountability Office;
- Input obtained from the NCUA Board and executive staff;
- Complaints received and investigations conducted in prior years;
- Request(s) from the Council of Inspectors General on Financial Oversight; and
- The credit union industry's operating environment.

How We Created the Annual Work Plan

The NCUA OIG plans its work to identify and respond to issues that are of greatest importance to the NCUA's mission and related goals. For purposes of the Plan, we identified prospective audit work that is responsive to the agency's strategic goals (see table below).



THE NCUA'S STRATEGIC GOALS¹

STRATEGIC GOAL 1:

Ensure a safe, sound, and viable system of cooperative credit that protects consumers.

STRATEGIC GOAL 2:

Improve the financial well-being of individuals and communities through access to affordable and equitable financial products and services.

STRATEGIC GOAL 3:

Maximize organizational performance to enable mission success

In preparing our 2023 Annual Work Plan, we considered that we did not perform a mandatory material loss review (MLR) in 2022. The Federal Credit Union Act (FCU Act), as amended by the Dodd-Frank Act, requires the OIG to conduct an MLR of an insured credit union if the loss to the Share Insurance Fund (SIF) exceeds \$25 million and an amount equal to 10 percent of the total assets of the credit union at the time in which the NCUA Board initiated assistance or was appointed liquidating agent pursuant to the FCU Act. In addition, for any loss to the SIF that does not meet this threshold, the FCU Act requires the OIG to conduct a limited-scope review to determine whether unusual circumstances exist related to the loss that would warrant conducting a full-scope MLR.

In addition to MLRs and other mandatory audits, we considered discretionary audit proposals identified by our staff and selected those audits we would perform in the coming year (see Appendix C). We selected those audit proposals we considered most significant to the NCUA's mission and the interests of the NCUA Board and Congress.

¹ Source: NCUA Strategic Plan 2022–2026.

RESOURCES

The OIG is composed of 10 full-time positions, including the Inspector General. The audit staff consists of five senior auditors and the Deputy Inspector General, who supervises the auditors. In addition, the OIG relies on contractors to supplement resources by assisting the OIG with conducting the annual financial statement audits, the annual independent evaluation required by FISMA, and any required MLRs or other program audits.

In addition to the annual financial statement audits and the FISMA evaluation, we use contracting dollars for short term, non-recurring projects. In 2023, the OIG's contracting budget for audits is approximately \$1.1 million.

We may defer audits that we cannot accomplish in 2023 to 2024.

This 2023 Annual Work Plan includes the following appendices:

Appendix A: Planned Audits

Appendix B: Legal Projects and Investigative Work

Appendix C: Summary of Planned Audits

APPENDIX A: PLANNED AUDITS

Carryover Audits from 2022 to 2023

Contracting Officer Representative (COR) Program

NCUA's contracting officers may delegate certain responsibilities to CORs to act on behalf of the contracting officer. These responsibilities include overseeing general contractor performance and their technical work. CORs must be fully qualified in accordance with the NCUA COR certification program prior to their appointment. The NCUA's COR certification program follows the Federal Acquisition Institute's Federal Acquisition Certification for Contracting Officer's Representatives program.

Objectives: Determine whether the NCUA is adhering to its Acquisition Policy Manual regarding the Contracting Officer Representative Program. Specifically, determine whether: (1) staff serving in the role of Contracting Officer Representative have been appropriately nominated, appointed, and received training/certification; and (2) appointed CORs are performing contract administration in accordance with applicable policies and procedures.

Bank Secrecy Act (BSA) Enforcement Policy

Every credit union must comply with BSA requirements. BSA compliance requires credit unions to track cash transactions and purchases of cash equivalents, such as money orders, and to comply with other recordkeeping and reporting requirements. The forms credit unions use most frequently to report transactions to the Financial Crime Enforcement Network (FinCEN) are the Currency Transaction Report and the Suspicious Activity Report. The BSA also requires the verification of member identity and response to information request lists provided by FinCEN. 12 U.S.C. § 1786(q) provides the NCUA with the authority to ensure compliance with BSA requirements as a condition of federal insurance.

Objectives: Determine whether the NCUA: (1) adequately reviews compliance with the BSA during credit union safety and soundness examinations, (2) issues timely formal or informal enforcement actions to address BSA-related violations, (3) tailors enforcement actions to address deficiencies identified during the supervisory process, (4) follows up on reported BSA violations to ensure credit unions take appropriate corrective action before closure of the violation, and (5) appropriately refers significant BSA violations and deficiencies to the Department of Treasury.

Preventing and Detecting Cyber Threats

Security Information and Event Management (SIEM) software collects and aggregates log data generated throughout the organization's technology infrastructure – from host systems and applications to network and security devices such as firewalls and antivirus filters. The software then identifies, categorizes, and analyzes incidents and events. SIEM provides reports on security-related incidents and events, such as successful and failed logins, malware activity, and other possible malicious activities, and sends alerts if the analysis shows that an activity runs

against predetermined rulesets and thus indicates a potential security issue. The NCUA network includes firewalls as part of its defense to protect the agency network.

Objective: Assess and report on the effectiveness of the NCUA's controls associated with its firewalls and the SIEM solution for protecting against and detecting cybersecurity threats to the NCUA's network.

Quality Assurance (QA) Program

The NCUA's QA program includes assessing and reviewing all activities related to oversight of federally insured credit unions. The National Supervision Policy Manual (NSPM) and other NCUA documents describe the QA program and the reporting processes the NCUA uses to evaluate and review credit union examination reports and supervision work. The QA program's goals include ensuring: (1) timely identification of credit union problems, (2) results-oriented reports and timely communication with officials, (3) uniform application of examination, insurance, supervision policies, procedures, and standards, and (4) consistent and timely feedback to examiners regarding their work.

Objective: Determine whether the NCUA conducts its QA program in accordance with requirements.

Financial Statement Audits (4) for the Year Ending December 31, 2022

The OIG will conduct an audit of the NCUA's financial statements for its four funds for the year ending December 31, 2022: the SIF, the Operating Fund (OF), the Central Liquidity Facility (CLF), and the Community Development Revolving Loan Fund (CDRLF). We contract with an independent public accounting firm to conduct this audit. We issue the audit report within 45 days of NCUA's calendar year-end.

Objective: Determine whether the four funds the NCUA administers comply with U.S. generally accepted accounting principles (GAAP) and whether the NCUA's statements present fairly, in all material respects, the financial position, results of operations, and changes in cash flows.

New Starts - Mandatory Audits for 2023

Material Loss Reviews (MLRs) (as necessary)

The FCU Act, as amended by the Dodd-Frank Act, requires the OIG to review and report on any credit union material losses to the SIF exceeding \$25 million and 10 percent of the assets of the failed credit union at the time in which the NCUA Board initiated assistance or was appointed liquidating agent pursuant to the FCU Act. In addition, the FCU Act requires the OIG to conduct a limited review of all non-material losses to the SIF and elevate them to an MLR if they present unusual circumstances.

Objectives: (1) Determine the cause(s) of the credit union's failure and the resulting loss to the SIF; (2) assess the NCUA's supervision of the institution, including implementation of the prompt corrective action requirements of Section 216 of the FCU Act; and (3) make appropriate observations and/or recommendations to prevent future losses.

Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act)

The Charge Card Act requires all agencies to establish and maintain safeguards and internal controls for charge cards. The Charge Card Act also establishes the Inspector General's risk assessment, audit, and reporting requirements.

Objective: Identify and analyze the risks of illegal, improper, or erroneous charge card purchases and payments and provide and report recommendations – if warranted – to agency management, the Director of the Office of Management and Budget, and the Congress.

Federal Information Security Modernization Act (FISMA)

FISMA requires each agency to develop, document, and implement an agency-wide program to provide information security for the systems that support the operations and assets of the agency. FISMA includes a requirement that the Inspectors General perform an annual evaluation of the agency's program. This evaluation includes testing the effectiveness of information security policies, procedures, and practices of a representative subset of the agency's information systems, and assessing the effectiveness of the information security policies, procedures, and practices of the agency. The OIG also assesses the NCUA's privacy program.

Objective: Determine whether the NCUA information security and privacy management policies and procedures comply with FISMA and related federal regulations and standards.

Financial Statement Audit of the NCUA's Schedule of Contributed Capital and Related Note Disclosures

The OIG will audit the NCUA's Schedule of Contributed Capital and related note disclosures. We will contract with an independent public accounting firm to conduct this audit and provide the resulting audit report to the U.S. Department of Treasury and the U.S. Government Accountability Office for their use in preparing and auditing the *Financial Report of the U.S. Government*.

Objective: Determine whether the NCUA's Schedule of Contributed Capital and related note disclosures present fairly, in all material respects, the contributed capital of the NCUA in accordance with GAAP for the period under review.

Financial Statement Audits (4) for the Year Ending December 31, 2023

The OIG will conduct an audit of the NCUA's financial statements for its four funds for the year ending December 31, 2023: the SIF, the Operating Fund (OF), the Central Liquidity Facility (CLF), and the Community Development Revolving Loan Fund (CDRLF). We contract with an independent public accounting firm to conduct this audit. We issue the audit report within 45 days of NCUA's calendar year-end.

Objective: Determine whether the NCUA's financial statements for its four permanent funds comply with GAAP and present fairly, in all material respects, the agency's financial position, results of operations, and changes in cash flows for the period under review.

Congressional/NCUA Board Requests (as necessary)

Objective: Conduct OIG audits, investigations, or other work in response to requests from the Congress or the NCUA Board.

Potential New Starts for 2023 (Discretionary Audits)

Examination Hours

The NCUA determines the number of examination hours needed to complete federal credit union safety and soundness examinations using asset sizes and CAMELS² scores. Data released by the Federal Deposit Insurance Corporation (FDIC) indicates that the FDIC schedules far more examination hours for banks than the NCUA schedules for similar sized credit unions. In addition, the NCUA established an Exam Flexibility Initiative internal working group with the goal of improving the agency's ability to adapt to economic changes and emerging issues while ensuring staff have the resources they need to appropriately examine and supervise credit unions. The working group's objectives included taking advantage of new technology to make exams more efficient, reducing onsite presence, identifying program areas where the added flexibility and hours from an extended examination cycle should be repurposed to mitigate risk from an extended cycle, and ensuring the agency's supervision program remains effective.

Objectives: Determine: (1) the NCUA's effectiveness in establishing examination hours; and (2) whether the NCUA is meeting its goals to lessen the examination burden on credit unions while ensuring proper regulatory safeguards remain in place to protect the credit union system, credit union member deposits, and the SIF.

Network Vulnerability Management Program

As part of the annual FISMA evaluation, the OIG has conducted independent vulnerability scans of the NCUA's network since 2018 with similar results. The NCUA has not been able to resolve many recommendations from the OIG's FISMA evaluations because it has not addressed many of the vulnerabilities identified by the scans. In response to the 2022 FISMA evaluation, NCUA management stated:

- The agency has been working since March 2021 to address the level of outstanding unpatched and unsupported software which has resulted in a significant decline of that level.
- Most of the remaining vulnerabilities are primarily related to legacy systems scheduled for decommissioning or upgrades, or systems that are part of ongoing remediation with compensating controls and enhanced monitoring.
- The agency has a sound process to identify vulnerabilities and to either timely remediate the vulnerabilities or establish a plan of action and milestone or acceptance of risk.

² The acronym CAMELS derives its name from the following components: [C]apital Adequacy, [A]sset Quality, [M]anagement, [E]arnings, and [L]iquidity, and [S]ensitivity to Market Risk.

Objective: Determine whether the NCUA's vulnerability management program (e.g., scanning, remediation, risk acceptance) adequately assesses and manages the risks to the agency's infrastructure.

Chartering Proposed Federal Credit Unions

Under the FCU Act, the NCUA charters new federal credit unions. The Office of Credit Union Resources and Expansion (CURE) provides support to low-income, minority, and any credit union seeking assistance with chartering, charter conversions, by-law amendments, field of membership expansion requests and low-income designations. CURE is responsible for processing charter applications and issuing charters. Interested potential organizers must submit required information and meet critical elements before the NCUA grants a credit union charter, which include the potential credit union's: (1) purpose and core values, (2) field of membership, (3) capital, and (4) subscribers.

Objective: Determine whether the NCUA's process to charter new federal credit unions is efficient and effective, including its process for chartering credit unions that include underserved areas, without regard to location, in their fields of membership.

Examination Program Fraud Detection Techniques

The primary purpose of NCUA's examination and supervision program is to ensure federally insured credit unions comply with applicable laws and regulations and operate in a safe and sound manner. Safety and soundness expectations for insured credit unions include internal controls to deter and detect fraud. As such, the NCUA conducts a review of internal controls on a risk-focused basis and incorporates fraud detection techniques into some aspects of the examination program.

Objective: Determine whether the NCUA has adequate policies, procedures, and other measures in place to deter, detect, and mitigate the risk of credit union fraud.

Asset Management and Assistance Center (AMAC) Non-Share Payments

NCUA's AMAC conducts credit union liquidations and performs management and recovery of assets. The AMAC also commonly organizes asset management estates (AMEs) to hold assets and other property acquired from failed institutions, which facilitates funding and disposition of assets. For FY 2021, the non-share payouts for natural person credit union AMEs included over \$1.5 million in administrative liquidation expenses and over \$4 million in pass-through payments to third parties such as loan servicers.

Objective: Determine whether the NCUA properly and accurately pays non-share payments.

Cloud Computing Services

In December 2021, the NCUA began migrating data into a cloud computing environment. According to National Institute of Standards and Technology Special Publication 800-144, cloud computing is "a model for enabling convenient, on-demand network access to a shared pool of configurable computing resources (e.g., network, service, storage, applications, and services) that can be rapidly provisioned and released with minimal management effort or service provider interaction." In cloud computing environments, some controls over information assets and operations may be outsourced to the cloud service provider. A careful review of the contract between the agency and the cloud service provider along with an understanding of the potential risks is important in management's understanding of its responsibilities for implementing appropriate controls. Failure to understand the division of responsibilities for assessing and implementing appropriate controls over operations may result in increased risk of operational failures or security breaches. Processes should be in place to identify, measure, monitor, and control the risks associated with cloud computing.

Objective: Determine how the NCUA manages its cloud computing environment and whether it appropriately assesses and implements controls to mitigate the risks.

Certified Public Accountant (CPA) Audits or Independent Agreed-Upon Procedures Engagement for Credit Unions

Credit unions have a fiduciary responsibility to their members to maintain a high level of professional standards as members are entrusting these institutions with their savings. Best practices suggest that financial institutions conduct an independent assessment or CPA audit to help ensure the safety and soundness of internal controls. As a result of MLRs conducted by the OIG of liquidated credit unions, we determined that a lack of a CPA audit or independent agreed-upon procedures engagement may have contributed to the failures. We also determined that CPA audits or independent agreed-upon procedures engagements would have included such procedures as analytical testing over expense and fee income accounts, testing of internal controls, and independent third-party confirmations of material accounts. These reviews greatly enhance the information available to NCUA examiners when evaluating a credit union's financial and operational condition and determining related CAMELS and risk ratings.

Objective: Determine the feasibility of NCUA requiring all credit unions to have an annual CPA audit or independent agreed-upon procedures engagement.

Digital Records Management

The way federal agencies manage government records has been a major concern. In June 2018, the Office of Management and Budget (OMB) issued guidance titled *Delivering Government Solutions in the 21st Century: Reform Plan and Reorganization Recommendations*, which included a proposal to transition agency business processes and recordkeeping to a fully electronic environment and end the National Archives and Records Administration's acceptance of paper records by December 31, 2022. In June 2019, OMB issued OMB M-19-21, *Transition*

to Electronic Records, which described the steps the government will take to meet the paperless goal. The memorandum requires all federal agencies to: (1) ensure that all federal records are created, retained, and managed in electronic formats, and (2) develop plans to close agency-operated storage facilities for paper records and transfer those records to Federal Records Centers operated by the National Archives and Records Administration or commercial storage facilities.

Objective: Assess the NCUA's actions to create, retain, and manage records in electronic formats consistent with OMB policy and other requirements.

Office of Foreign Asset Control (OFAC) Compliance Review

The OFAC administers laws that impose economic sanctions against hostile targets to further U.S. foreign policy and national security objectives. The OFAC requires U.S. financial institutions to block and file reports on accounts, payments, or transfers in which an OFAC-designated country, entity, or individual has interest. Although the NCUA OIG reviewed this subject³ in 2006, the use of sanctions has greatly increased since then, potentially increasing the risk of non-compliance by credit unions with OFAC requirements.

Objective: Determine whether NCUA provides effective supervision of credit unions' compliance with OFAC requirements.

Enterprise Risk Management (ERM)

The NCUA employs an ERM program to inform executive leadership of various factors that can affect the agency's performance relative to its mission, vision, and performance outcomes. The NCUA's ERM Council provides oversight of the agency's ERM activities. Overall, the NCUA's ERM program promotes awareness of risk, which, when combined with robust measurement and communication, are central to cost-effective decision-making and risk optimization within the agency.

Objective: Assess the NCUA's implementation of ERM based on relevant criteria and best practices.

³ Office of Foreign Asset Control Compliance Review, OIG-06-09 (ncua.gov)

Mandatory New Starts for 2024

Material Loss Reviews (as necessary)

Objectives: (1) Determine the cause(s) of the credit union's failure and the resulting loss to the SIF, (2) assess the NCUA's supervision of the institution, including implementation of the prompt corrective action requirements of Section 216 of the FCU Act, and (3) make appropriate observations and/or recommendations to prevent future losses.

Government Charge Card Abuse Prevention Act (Charge Card Act) of 2012

Objective: Review the NCUA's purchase and travel card programs to analyze risks of illegal, improper, or erroneous purchases and payments and provide and report recommendations – if warranted – to agency management, the Director of the Office of Management and Budget, and the Congress.

Federal Information Security Modernization Act (FISMA)

Objective: Determine whether the NCUA information security and privacy management policies and procedures comply with FISMA and federal regulations and standards.

Financial Statement Audit of the NCUA's Schedule of Contributed Capital and Related Note Disclosures

Objective: Determine whether the NCUA's Schedule of Contributed Capital and related note disclosures present fairly, in all material respects, the contributed capital of the NCUA in accordance with GAAP.

Financial Statement Audits (4) for the Year Ending December 31, 2024

Objectives: Determine whether the financial statements for the NCUA's four permanent funds comply with GAAP and present fairly, in all material respects, the agency's financial position, results of operations, and changes in cash flows for the period under review.

Enhanced Personnel Security Program

Objective: Assess the NCUA's enhanced personnel security program for covered individuals of the agency in accordance with performance measures and standards established by the Director of National Intelligence.

Congressional/NCUA Board Requests (as necessary)

Objective: Conduct OIG audits, investigations, or other work in response to requests received from the Congress or the NCUA Board.



Potential Discretionary New Starts for 2024⁴

Insider Threat and Counterintelligence Program (ITCIP)

Objective: Determine whether the NCUA's ITCIP is operating in accordance with NCUA Instruction 9904 and other requirements.

Fair Lending Examination Program

Objectives: Determine whether the NCUA: (1) conducts fair lending examinations in compliance with applicable laws, regulations, policies, and procedures; and (2) appropriately refers matters to the U.S. Department of Housing and Urban Development or the Department of Justice.

Consumer Complaint Handling by Regions

Objectives: Determine (1) how the NCUA's Regions handle and process the complaints they receive from the Consumer Assistance Center; and (2) whether the Regions communicate the results of the complaint to the Consumer Assistance Center.

Member Business Loans

Objective: Determine whether the NCUA ensures credit unions effectively mitigate member business loan risks.

Capital Planning

Objectives: Determine whether NCUA examiners adequately assess capital planning activities to ensure credit unions maintain sufficient capital to sustain operations even under adverse conditions.

Electronic Media Sanitization

Objective: Determine whether the NCUA's process for sanitizing information systems media before its disposal or reuse is effective for protecting sensitive information or personally identifiable information.

Consumer Compliance Examination Program

Objective: Determine whether the NCUA adequately assesses a credit union's ability to effectively manage consumer compliance risk.

⁴Based on various factors, the OIG could decide to move a potential discretionary new start listed for 2024 and conduct it in 2023.

Subject Matter Examiners (SME) Program

Objective: Determine whether the NCUA's SME program adequately selects, assigns, trains, develops, and prepares examiners to provide expert advice and support during examinations.

Offboarding Process

Objective: Determine whether the agency's controls over the offboarding process effectively mitigate security and reputational risks.

Development and Communication of NCUA's Supervisory Letters, Examiner's Guide, and the National Supervision Policy Manual

Objective: Determine NCUA's processes to develop, update, communicate, and promote Supervisory Letters, Examiner's Guide, National Supervision Policy Manual, and other guidance, and assess the consistency of the content of these documents with each other.

Supervisory Committee Audit Responsibility

Objective: Determine whether NCUA examiners evaluate supervisory committee audit activities and reports for annual audits and periodic internal control reviews in accordance with requirements and considers such information in determining the scope of examinations.

Examiner-In-Charge Rotation Policy

Objective: Determine whether NCUA management rotates examiners-in-charge from assigned credit unions in accordance with the schedule set forth in the National Supervision Policy Manual and documents any reasons for not rotating as required.

APPENDIX B: LEGAL PROJECTS AND INVESTIGATIVE WORK

2023 Legal Activities

- General legal support
- Administrative/personnel legal work
- Investigative assistance and support
- Audit assistance and support
- Legislation/regulation review
- Freedom of Information Act responses

2023 Investigations

- Investigations into NCUA employee and contractors resulting from complaints/referrals
- Proactive reviews and/or investigations
- Coordination with other law enforcement and the NCUA on credit union-related complaints

2023 Training

• Briefings on OIG authorities and responsibilities as needed to supplement online training

APPENDIX C: SUMMARY OF PLANNED AUDITS

2023 Audit Projects

Carryover Audits from 2022 to 2023

- Contracting Officer Representative (COR) Program
- Bank Secrecy Act (BSA) Enforcement Policy
- Preventing and Detecting Cyber Threats
- Quality Assurance (QA) Program
- Financial Statement Audits (4) for the Year Ending December 31, 2022

New Starts for 2023 – Mandatory Audits

- Material Loss Reviews (MLRs) (as necessary)
- Government Charge Card Abuse Prevention Act (Charge Card Act) of 2012
- Federal Information Security Modernization Act (FISMA)
- Financial Statement Audit of the NCUA's Schedule of Contributed Capital and Related Note Disclosures
- Financial Statement Audits (4) for the Year Ending December 31, 2023
- Congressional/NCUA Board Requests (as necessary)

Potential New Starts for 2023 – (Discretionary Audits)

- Examination Hours
- Network Vulnerability Management Program
- Chartering Proposed Federal Credit Unions
- Examination Program Fraud Detection Techniques
- Asset Management and Assistance Center (AMAC) Non-Share Payments



- Cloud Computing Services
- Certified Public Accountant (CPA) Audits or Independent Agreed-Upon Procedures Engagement for Credit Unions
- Digital Records Management
- Office of Foreign Assets Control (OFAC) Compliance Review
- Enterprise Risk Management (ERM)

2024 Projects

Audits - Mandatory and Discretionary

- Material Loss Reviews (MLRs) (as necessary)
- Government Charge Card Abuse Prevention Act (Charge Card Act) of 2012
- Federal Information Security Modernization Act (FISMA)
- Financial Statement Audit of the NCUA's Schedule of Contributed Capital and Related Note Disclosures
- Financial Statement Audits (4) for the Year Ending December 31, 2024
- Enhanced Personnel Security Program
- Congressional/NCUA Board Requests (as necessary)
- Insider Threat and Counterintelligence Program (ITCIP)
- Fair Lending Examination Program
- Consumer Complaint Handling by Regions
- Member Business Loans
- Capital Planning
- Electronic Media Sanitization
- Consumer Compliance Examination Program

- Subject Matter Examiners (SME) Program
- Offboarding Process
- Development and Communication of NCUA's Supervisory Letters, Examiner's Guide, and the National Supervision Policy Manual (NSPM)
- Supervisory Committee Audit Responsibilities
- Examiner-In-Charge Rotation Policy