

# 2016-2017 Annual Performance Plan **National Credit Union Administration**



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# 2016-2017 Annual Performance Plan

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# **Executive Summary**

The National Credit Union Administration's (NCUA) 2016-2017 Annual Performance Plan (Plan), in concert with NCUA's operating budget, outlines the resources and strategies NCUA will use to achieve agency priorities and improve agency performance. The Plan outlines the priorities and performance goals for the next two years to ensure NCUA continues to meet the mission of promoting confidence in the national system of cooperative credit. This Plan is guided by NCUA's Strategic Plan 2014 through 2017, and complies with the Government Performance and Results Modernization Act of 2010 (GPRA Modernization Act) and the Office of Management and Budget's (OMB) Circular A-11.

This Plan strives to provide stakeholders, including NCUA employees, consumers, credit unions, other agencies, and Congress, with transparency and understanding around NCUA's performance goals by drawing a clear line from the agency's mission to the strategic goals, strategic objectives, performance goals, and performance indicators and targets.

The Plan includes four strategic goals supported by strategic objectives and performance goals. The 2014-2017 strategic goals are to:

- 1. Ensure a safe, sound, and sustainable credit union system
- 2. Promote consumer protection and financial literacy
- 3. Further develop a regulatory environment that is transparent and effective, with clearly articulated and easily understood regulations
- 4. Cultivate an environment that fosters a diverse, well-trained and motivated staff

NCUA has appointed a senior executive as the goal leader for each strategic goal. The goal leader is responsible for managing the strategic goal and underlying objectives. NCUA will use the performance indicators and targets in this Plan to monitor progress in meeting established objectives and performance goals.

NCUA Chairman Matz established six management priorities in 2009. These management priorities, discussed on page nine, align with NCUA's strategic goals and further guide agency initiatives and objectives.

This Plan addresses NCUA's key challenges and leverages agency strengths. The credit union system continues to consolidate, requiring ongoing adjustments to the examination and supervision program. Preparing the system for potential changes to the interest rate environment and increasingly complex cyber-attacks remain challenges and priorities for the agency. NCUA continues to experience senior management retirements necessitating a greater focus on staff and leadership development as well as capturing valuable institutional knowledge. NCUA's greatest strength continues to be its dedicated, knowledgeable, and professional staff. Specific information on leveraging the strengths to address the challenges is detailed in the remainder of this Plan.



Credit unions provide a valuable service to the public as accessible financial institutions that are not driven by profit, but by the well-being of their members. The NCUA Board and staff will continue to promote the success of the credit union system by providing the framework for a safe, sound system that is responsibly managed and able to provide desired services to current and future members.

# **Mission and Vision**

Throughout 2016 and 2017, NCUA will implement initiatives to continue meeting its mission to "provide, through regulation and supervision, a safe and sound credit union system which promotes confidence in the national system of cooperative credit," and its vision to ensure that "NCUA will protect consumer rights and member deposits."

# **Organizational Structure**

Created by Congress, NCUA is an independent federal agency with the unique role of insuring deposits at all federal and most state-chartered credit unions, protecting the members who own credit unions, and regulating federally chartered credit unions. A three member politically appointed Board oversees NCUA's operations by setting policy, approving budgets, and adopting rules.

As of June 30, 2015, 101 million members have \$935 billion in insured deposits at 6,159 federally insured credit unions. These credit unions have \$1.17 trillion in assets.

Through a robust and effective examination and supervision program, NCUA protects the safety and soundness of the credit union system by mitigating risks to the National Credit Union Share Insurance Fund (NCUSIF). Backed by the full faith and credit of the U.S. Government, the NCUSIF provides members with at least \$250,000 of insurance. NCUA provides insurance to all federal credit unions (FCUs) and the overwhelming majority of state-chartered credit unions.

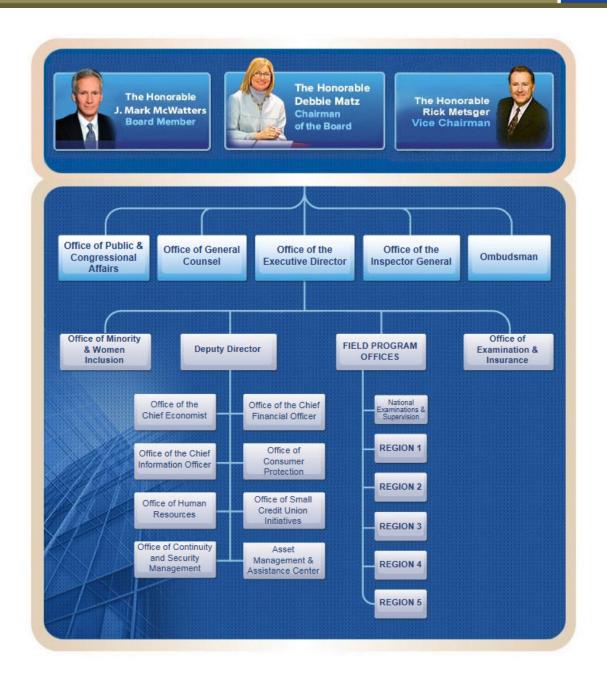
In addition to the NCUSIF, NCUA operates three other permanent funds—the Operating Fund, the Central Liquidity Facility (CLF), and the Community Development Revolving Loan Fund (CDRLF). The NCUA Operating Fund, in conjunction with the NCUSIF, finances the agency's operations. The CLF is a contingent federal liquidity source, owned by its member credit unions and administered by the NCUA Board. The CLF serves as a back-up lender to credit unions to meet unexpected needs of its members when funds are unavailable from standard credit sources. The NCUA CDRLF provides loans and grants to low-income designated credit unions. In addition to these four permanent funds, NCUA operates the Temporary Corporate Credit Union Stabilization Fund, which Congress created to manage the costs of paying for the recent corporate credit union failures over time.

Throughout the Plan period, NCUA will rely upon 1,247 employees to perform all the tasks in NCUA's major program areas and support functions. NCUA operates a central office, an Asset Management and Assistance Center (AMAC) to liquidate credit unions and recover assets, and five regional offices. Reporting to these regional offices, NCUA has 68 supervisory groups each with eight to ten examiners responsible for a portfolio of credit unions covering all 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands.

The examination, supervision, and insurance programs are the central focus for NCUA. These functions are the primary responsibility of the regions, the Office of National Examinations and Supervision (ONES), and the Office of Examination and Insurance (OEI). Examination field staff work in a virtual environment and represent nearly two-thirds of the workforce.

Since nearly two-thirds of the workforce do not report to an office on a daily basis, NCUA is a highly decentralized organization. This structure requires creative methods to deliver the necessary administrative and office support to all staff. The support functions of the central offices are critical in providing the infrastructure for the success of the field program in the virtual environment.

NCUA's organizational chart is below. An interactive organizational chart is available on our website.



# **Major Agency Programs**

# **Supervision**

The supervision program contributes to the safety and soundness of the credit union system. A program priority includes identifying and resolving risk concerns such as interest rate risk, operational risks including cybersecurity, credit risk, and reputational risk. NCUA supervises federally insured credit unions through examinations and regulatory enforcement including providing guidance through various publications and taking administrative actions as necessary to manage risk.

#### **Insurance**

NCUA manages the NCUSIF, which provides insurance for deposits held at federally insured credit unions. The fund is capitalized by credit unions. NCUA manages the fund to ensure member deposits are insured to at least \$250,000.

#### **Small Credit Union Initiatives**

NCUA fosters credit union development, particularly the expansion of services provided by small credit unions to eligible members. This is addressed through consulting, training, partnerships and assistance. A major source of assistance is the CDRLF, which provides loans and technical assistance grants to credit unions serving low-income members to provide basic financial services and stimulate economic activities in their communities.

#### **Consumer Protection**

NCUA protects credit union members through effective enforcement of federal financial services consumer protection laws, regulations, and requirements. NCUA also develops and promotes financial literacy education programs for credit unions to assist members in making financial decisions.

#### **Asset Management**

NCUA conducts credit union liquidations and performs management and recovery of assets through AMAC. AMAC strives to maximize the recovery of assets in liquidations. AMAC assists NCUA regional offices with the review of large, complex loan portfolios and actual or potential bond claims. It also participates extensively in the operational phases of conservatorships and records reconstruction. The purpose of AMAC is to minimize costs to the NCUSIF and credit union members.



# **Cross-Agency Priority Goals and Collaboration**

The GPRA Modernization Act requires federal agencies to address Cross-Agency Priority (CAP) Goals in their strategic plan, annual performance plan, and annual performance report. The national level CAP Goals are located at <a href="www.Performance.gov">www.Performance.gov</a>. While NCUA is an independent federal agency and not part of the federal budget, its efforts align to four CAP Goals: Cybersecurity, Insider Threat and Security Clearance Reform, Open Data, and People and Culture.

NCUA is also involved in numerous cross agency initiatives by collaborating with the other financial regulatory agencies through participation in several councils. Significant councils include the Financial Stability Oversight Council (FSOC), the Federal Financial Institutions Examination Council (FFIEC), the Financial and Banking Information Infrastructure Committee (FBIIC), and the OMB Performance Improvement Council. These councils and their many associated taskforces and working groups contribute to the success of NCUA's mission.

# **Agency Priority Goals**

OMB encourages all agencies to prioritize goals in their strategic and annual performance plans. An Agency Priority Goal (APG) is a subset of the agency's performance goals and represents the highest implementation priorities. An APG is a near-term result or achievement to accomplish within approximately 24 months. NCUA identifies the following six performance goals as APGs.

#### 1. Performance Goal 1.2.1

Implement a robust supervision framework for NCUA's financial-reform regulations including interest rate risk, liquidity and contingency funding plans, derivative authority, and capital planning and stress testing as measured by:

- Incorporating approved interest rate risk criteria into supervision policies that specify potential prompt corrective action (PCA) remedies for high risk institutions, by 2016Q4.
- Issuing enhanced examiner guidance on interest rate risk management; including sensitivity analysis and evaluation of quantitative risk measurements, by 2016Q4.
   Conducting training and outreach communications throughout 2016.
- Reviewing and assessing all capital plans and stress tests for credit unions with assets greater than \$10 billion, within timelines outlined in regulation.
- Developing a plan and initiating the first phase of incorporating an interest rate risk sensitivity component ("S") into the exam rating system (CAMELS), by 2016Q4.

#### 2. Performance Goal 1.4.2

Issue industry guidance related to emerging cybersecurity risks and related threats achieved by training all examiners on the FFIEC Cybersecurity Assessment Tool and implementing use of the tool into examination procedures by 2016Q3.

#### 3. Performance Goal 2.3.1

Monitor issues or trends in consumer complaints to develop effective financial literacy education programs and initiatives achieved by conducting quarterly reviews of the top ten consumer complaints to ensure existing and planned education programs align with complaint trends.

#### 4. Performance Goal 3.4.1

Develop guidance to credit unions to provide explanation of regulatory changes and best practices for implementation achieved by issuing appropriate guidance such as Letters to Credit Unions, Supervisory Letters, Webinars, AIRES questionnaires, or other multi-media outreach in conjunction with regulatory changes issued by the Board, when warranted.

#### 5. Performance Goal 4.3.1

Increase the number of women, persons with disabilities, and minority staff at all levels particularly in the management ranks as measured by:

- Maintaining NCUA's position in the top five mid-sized agencies for the Support for Diversity Indicator (Employee Viewpoint Survey Questions 34, 45, and 55). These questions measure the extent to which employees believe that actions and policies of leadership and management promote and respect diversity.
- Maintaining NCUA's position in the top six agencies in its size category for the Office of Personnel Management's (OPM) New Inclusion Quotient (IQ). The New IQ identifies behaviors that help create an inclusive environment.

#### 6. Performance Goal 4.6.4

Strengthen the security program in the areas of personnel, facilities, continuity of operations and secure communications achieved by:

- Migrating NCUA's technology infrastructure from the legacy data center to a modern, completely redundant, and secure data center facility.
- Maintaining a favorable response rate of 70 percent or above for NCUA's Federal Employee Viewpoint Survey Question 36 "My organization has prepared employees for potential security threats."



# **Management Priorities**

To fully implement NCUA's mission, the following are NCUA priorities that factor into the strategic plan and annual performance plan. These priorities, established by Chairman Matz, are the core theme of NCUA's actions. These priorities enable NCUA to address system changes, and provide the core of the four strategic goals. The priorities are for NCUA to be:

- 1. Recognized as a fair, effective regulator that sets the highest standards for safety and soundness (Goal 1).
- 2. An advocate of initiatives to protect members from predatory, unsafe financial products (Goal 2).
- 3. A regulator that ensures access to credit union service for all eligible members (Goal 2).
- 4. An agency that listens and encourages an exchange of ideas with the credit union industry while maintaining its independence (Goal 3).
- 5. A model corporate citizen that recognizes its responsibility to implement environmentally sound practices and procedures wherever and whenever feasible (Goals 3 & 4).
- 6. An employer of choice and reliable partner with elected labor representatives, understanding that employees are its most important asset and a diverse workforce enriches the agency and its employees, and enhances their output (Goal 4).

# **Summary of Strategic Goals and Objectives**

The chart below summarizes NCUA's 2014-2017 strategic goals and objectives. The objectives support and complement the strategic goals. Each strategic objective has performance goals with measurable indicators and targets. Performance indicators use available data to provide a way to determine if NCUA's goals and objectives are met in the proposed time frame. Targets serve to establish a level of performance NCUA strives to achieve. NCUA reviews performance indicators and targets to assess the effectiveness of programs and takes into account how risks and opportunities impact achieving our strategic goals and objectives. This assessment allows the agency to make adjustments to improve performance throughout each year and the strategic plan timeframe.

Strategic Goals	Strategic Objectives		
	1.1 Identify, measure, monitor, and mitigate levels of risk in the credit union industry through effective regulations, supervision, and examination.		
	1.2 Manage operational vulnerabilities resulting from new products and services, especially shifts in balance sheet composition.		
Goal 1: Ensure a Safe, Sound, and Sustainable Credit Union System	1.3 Implement tools and models for evaluation and assessment of industry-wide risks.		
27000	1.4 Be prepared for and promote awareness of critical risk issues, emerging technologies, and related threats.		
	1.5 Increase ability to manage risk through an effective examination and supervision program that minimizes loss to the NCUSIF.		
	2.1 Establish a framework of well-balanced regulations and policy statements.		
	2.2 Ensure federally insured credit unions comply with rules and regulations established to protect consumers.		
Goal 2: Promote Consumer Protection and	2.3 Develop and promote financial literacy education programs to empower consumers to make informed financial decisions.		
Financial Literacy	2.4 Promote access to federally insured financial services for consumers of all backgrounds and income levels.		
	2.5 Review marketing and business plans of community charters to ensure progress toward meeting stated goals.		
	2.6 Educate credit unions about consumer compliance issues.		
Goal 3: Further Develop a Regulatory Environment	3.1 Reduce unnecessary obstacles to credit union competitiveness through modernized regulations.		
that is Transparent and Effective, with Clearly	3.2 Collaborate with other regulators to discuss strategies and goals for implementing new or revised regulations.		



Articulated and Easily Understood Regulations	3.3 Maintain a regulatory environment that safeguards member interests and stability in the credit union system.	
Ç	3.4 Enhance NCUA's communication with credit unions through transparent regulations and guidance.	
	4.1 Develop and maintain the optimal knowledge, skills, and abilities of the agency's workforce to meet emerging needs.	
	4.2 Enhance staff effectiveness and efficiency through the use of technology.	
Goal 4: Cultivate an Environment that Fosters a Diverse, Well-Trained and	4.3 Recruit and retain a well-diversified and highly qualified workforce that reflects the relevant labor force.	
Motivated Staff	4.4 Maintain an effective plan of succession to ensure continuity of leadership throughout all levels of the organization.	
	4.5 Improve NCUA's internal communication, both horizontally and vertically.	
	4.6 Enhance NCUA's position as one of the best places in the government to work.	

# Strategic Goals, Objectives, Performance Goals

# Strategic Goal 1: Ensure a Safe, Sound, and Sustainable Credit Union System

Strategic Objectives	Performance Goals		
	1.1.1 Maintain strong levels of credit union system-wide net worth and corporate credit union leverage ratios.		
1.1 Identify, measure, monitor, and mitigate levels of risk in the credit union industry through effective	1.1.2 Improve the number of rehabilitated problem credit unions (CAMEL Composite Codes 3, 4, and 5) as a percentage of problem credit unions.		
regulations, supervision, and examination.	1.1.3 Examine all federal credit unions annually.		
	1.1.4 Examine all federally insured state credit unions with assets above \$250 million annually.		
1.2 Manage operational vulnerabilities resulting from new products and services, especially	1.2.1 Implement a robust supervision framework for NCUA's financial reform regulations including interest rate risk, liquidity and contingency funding plans, derivatives authority, and capital planning and stress testing (Agency Priority Goal).		
shifts in balance sheet composition.	1.2.2 Update the automated examination system to incorporate economic model analysis.		
1.3 Implement tools and models for evaluation and assessment of industry-wide risks.	ssment of credit union industry		
	1.4.1 Identify regional and national emerging risks requiring necessary actions.		
1.4 Be prepared for and promote	1.4.2 Issue industry guidance related to emerging cybersecurity risks and related threats ( <i>Agency Priority Goal</i> ).		
awareness of critical risk issues, emerging technologies, and related threats.	1.4.3 Provide training in emerging technologies, especially for field and management staff.		
	1.4.4 Assist small and low-income credit unions to secure the proper technology and resources to ensure regulatory compliance and avoid any potential negative threats.		
1.5 Increase ability to manage risk	1.5.1 Maintain yearly NCUSIF losses as a percentage of total insured shares.		
through an effective examination and supervision program that minimizes loss to the NCUSIF.	1.5.2 Minimize total assets in CAMEL Code 4/5 rated credit unions.		



The Director of the Office of Examination and Insurance (OEI) is the goal leader for Strategic Goal 1 and the underlying objectives.

NCUA's primary function is to identify and assess credit union system risks, threats and vulnerabilities, determine the magnitude, and mitigate unacceptable levels through the examination and supervision program. Strategic Goal 1 objectives focus on minimizing current and future risks as early as possible and encouraging sustainability within the system. System risks include interest rate risk, operational risks including cybersecurity, concentration risk, credit risk, and reputation risk. NCUA strives to identify and address emerging issues in order to minimize losses to the NCUSIF.

The Federal Credit Union Act assigns statutory responsibility of the NCUSIF and oversight of the credit union system to NCUA. NCUA focuses on balancing safety and soundness and credit unions' abilities to meet member needs by ensuring all programs work in concert to achieve this goal.

Through its supervision program, NCUA conducts credit union examinations, enforces regulations, and provides guidance to assist credit unions in understanding regulations and emerging risks. Examinations, onsite and offsite supervision, and the collection of credit union 5300 Call Report data, provide information that helps to identify risks to the system and high-risk credit unions. Risks to the credit union system are typically resolved through the modernization of regulations, increased supervisory guidance, and administrative actions.

To maintain safety and soundness for credit unions, NCUA continues to implement its annual examination program. In recent years, the examination and supervision program has been improved by:

- The issuance of NCUA's National Supervision Policy Manual (NSPM) to standardize the supervision of credit unions.
- A streamlined examination report to better clarify the priority exam action items to be resolved, reduce redundancy, and ensure consistency.
- Enhanced communication systems for examiners such as a modernized resource library.
- The realignment of resources toward larger, more complex credit unions, including transferring the supervision of the largest credit unions greater than \$10 billion to ONES; and, the introduction of the Small Credit Union Examination Program (SCUEP) for FCUs with assets less than \$30 million.<sup>1</sup>
- The reallocation of resources from generalist examiners to specialists in order to provide support in higher risk areas, such as lending, capital markets, and information technology.

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<sup>&</sup>lt;sup>1</sup> To qualify for the small credit union examination program these FCUs must also receive a composite CAMEL rating of 1, 2, or 3 at their last examination.

NCUA continues its efforts to improve the supervision program and reallocate agency resources to credit unions and credit union activities that pose the most risk. These modernizations of the supervision program position NCUA to effectively identify and manage risks in the system. As NCUA continues to evaluate and enhance the quality of the examination and supervision program we will strengthen our forward looking approach to NCUA's supervision of the industry and exam program framework through reviewing: the integration of our data and modeling capabilities, workforce management needs, efficient and continuous quality control, and new technology and techniques needed to improve the examination platform to make exam process more efficient and effective.

Examiners also continue to use administrative actions as necessary to mitigate risks before they escalate to costly problems for the system. Additionally, NCUA's asset management program, administered by AMAC, ensures members are paid promptly after any necessary liquidation and reduces losses to the NCUSIF through effective liquidation of failed credit union assets. AMAC staff also provide expertise by conducting examinations of large complex loan portfolios and participating in operational phases of conservatorships.

Part of ensuring a safe, sound and sustainable credit union system includes assessing the tools and authorities at NCUA's disposal to fulfill its mission. NCUA considers the following legislative priorities important to fulfilling its mission:

- 1. Providing NCUA with vendor authority through statutory changes that achieve parity with the other federal financial regulatory agencies to regulate, examine, and take enforcement actions against third-party vendors. Given the increasing threats posed by cyber-terrorists, thieves and hackers, as well as the increasing use of third-parties for credit union services, this vendor authority bill is NCUA's top legislative priority.
- 2. Restoring NCUA's access to back-up liquidity. The specific statutory changes NCUA seeks include re-establishing NCUA's emergency borrowing authority of \$30 billion which sunset on December 31, 2010, and revising Title III of the Federal Credit Union Act to modernize the Central Liquidity Facility.
- 3. Improving NCUA's ability to manage the NCUSIF by providing more flexibility in setting the normal operating level and building retained earnings for the NCUSIF in a manner consistent with the size and complexity of the credit union industry and financial stability goals.

These ongoing efforts will help NCUA maintain a safe, sound, and sustainable credit union system.

# **Strategic Objective 1.1**

Identify, measure, monitor, and mitigate levels of risk in the credit union industry through effective regulations, supervision, and examination.

Identifying and managing risk in credit unions is NCUA's core program. A stable and sustainable credit union system is the foundation enabling credit unions to continue providing services to their



members and introducing new services or products to meet member needs. NCUA will continue identifying and managing risk through the following means, strategies, and initiatives:

#### *Operational Processes and Strategies:*

- Effectively and efficiently manage the annual examination program by ensuring:
  - Resources are allocated to credit unions and credit union activities posing the greatest risk.
  - Timely completion of examinations.
  - Effective follow-up with CAMEL 3, 4, and 5 credit unions to ensure timely resolution of regulatory violations and safety and soundness concerns.
  - Prompt and effective supervisory and resolution actions, if warranted.
- Ensure consistency of supervision and examination for all credit unions.
- Enhance internal tools and reports to support NSPM requirements.
- Continue to enhance existing and develop additional risk management tools and reports to support the supervision program.
- Evaluate ways to enhance the agency's current internal data collection processes.
- Provide ongoing staff training in identified emerging risk areas to enhance examination effectiveness.
- Work closely with the State Supervisory Authorities (SSAs) to ensure necessary action to mitigate risk within the state credit union program.

## Human Capital:

NCUA will use fewer generalist examiners in 2016. The decline in generalist examiners is a result of the full implementation of the SCUEP program and a revised FISCU examination schedule which leverages the onsite examination work of the SSAs. The decline in generalist examiners also aligns with the reallocation of resources from generalist examiners to specialists in order to provide support in higher risk areas, such as lending, capital markets, and information technology. Employing specialists adds expertise commensurate with the increasing sophistication of credit union operations so that NCUA is better equipped to address these risks going forward.

#### *Information Technology:*

- Resources will be used to redesign NCUA's Automated Integrated Regulatory Examination System (AIRES) as described under Strategic Objective 1.2.
- ONES will continue using a complete securities investment portfolio management system to monitor regulatory compliance, interest rate and credit risk in corporate credit unions.

#### Performance Goal 1.1.1

Maintain strong levels of credit union system-wide net worth and corporate credit union leverage ratios.

#### **Indicators**

- 1. Maintain aggregate net worth above 10 percent, annually.
- 2. Maintain the aggregate corporate credit union leverage ratio above 5 percent, annually.

## Performance Goal 1.1.2

Improve the number of rehabilitated problem credit unions (CAMEL Composite Codes 3, 4, and 5) as a percentage of problem credit unions.

#### **Indicators**

1. Maintain NCUSIF losses in problem credit unions at less than 0.03 percent of total assets in problem credit unions, annually.

#### Performance Goal 1.1.3

Examine all federal credit unions annually.

#### **Indicators**

1. Examine all federal credit unions by December 31, annually.

## Performance Goal 1.1.4

Examine all federally insured state credit unions (FISCUs) with assets above \$250 million annually.

#### **Indicators**

1. Examine all FISCUs with assets greater than \$250 million by December 31, annually.

#### **Strategic Objective 1.2**

Manage operational vulnerabilities resulting from new products and services, especially shifts in balance sheet composition.

As credit unions grow, they tend to become more complex, providing a wider array of products and additional services. Such complexity can be beneficial when it addresses members' needs and leads to increased diversification in credit union's assets. However, operational vulnerabilities resulting



from the introduction of new products and services must be well managed to ensure a safe, sound and sustainable credit union system. Shifts in balance sheet composition, including acquiring new products in large concentrations, can pose risks to the credit union system if the changes to the balance sheet are not well managed, monitored or controlled.

Sound liquidity planning and access to federal liquidity sources are also vital to managing shifts in balance sheet composition and the safety and soundness of the credit union system. NCUA's Liquidity and Contingency Funding Plans rule went into effect in 2014, to ensure all credit unions conduct sound liquidity planning and large credit unions establish access to at least one federal source of contingent liquidity.

As described in Appendix C, credit unions' balance sheets should be resilient under a wide variety of rate environments. The interest rate environment in 2016 and 2017 is likely to be marked by uncertainty and dominated by a transition to a more normal interest rate environment. Credit unions' ability to manage and mitigate interest rate risk remains vital for their success. NCUA uses the following means, strategies and initiatives to support our supervision framework:

## Operational Processes and Strategies:

- Provide timely guidance to the credit union system and examiners related to effectively incorporating new products and services into credit union operations.
- Continue to enhance existing and develop additional risk management tools and reports to support the supervision program.
- Redesign the examination management system.
- Review capital planning and stress testing for credit unions with assets over \$10 billion.

## Human Capital:

An information technology project manager will be added in 2016 to plan, direct, and coordinate the multi-year modernization of NCUA's automated examination management system.

## *Information Technology:*

To keep pace with the growing complexities of the credit union system, NCUA is redesigning its examination management system. The AIRES redesign will improve the primary program exam tool used to manage credit union supervision and examination functions. This system is a critical and primary information source for documenting the industry's health, safety and soundness.

## Performance Goal 1.2.1 (Agency Priority Goal)

Implement a robust supervision framework for NCUA's financial reform regulations including interest rate risk, liquidity and contingency funding plans, derivatives authority, and capital planning and stress testing.

#### **Indicators**

- 1. Incorporate approved interest rate risk criteria into supervision policies that specify potential prompt corrective action (PCA) remedies for high risk institutions by 2016Q4.
- 2. Issue enhanced examiner guidance on interest rate risk management; including sensitivity analysis and evaluation of quantitative risk measurements, by 2016Q4. Conduct training and outreach communications throughout 2016.
- 3. Review and assess all capital plans and stress tests for credit unions with assets greater than \$10 billion, within timelines outlined in regulation.
- 4. Develop plan and initiate first phase of incorporating an interest rate risk sensitivity component ("S") into the exam rating system (CAMELS), by 2016Q4.

#### Performance Goal 1.2.2

Update the automated examination system to incorporate economic model analysis.

#### **Indicators**

1. Initiate acquisition and develop an actionable roadmap and plan for modernizing NCUA's examination system by 2016Q4.

#### Strategic Objective 1.3

Implement tools and models for evaluation and assessment of industry-wide risks.

The evaluation and assessment of risks in the credit union industry is essential to the sustainability of the credit union system. NCUA continues to refine information derived from tools and models to prioritize the issuance of system and examiner guidance and to focus supervision efforts to minimize losses to the NCUSIF. NCUA employs business intelligence tools to identify and monitor risks to the credit union system using the following means, strategies and initiatives:

#### Operational Processes and Strategies:

The timely collection of credit union data contributes to achieving this objective. In 2014, NCUA began imposing civil money penalties on credit unions that file their 5300 Call Report late to deter late filing and improve NCUA's ability to collect timely data and evaluate and assess risks.



- NCUA's enterprise data integrity program serves as an integral part of the overall
  management of the availability, usability, integrity, and security of data generated, consumed,
  and shared. This program ensures mission-critical data is commonly understood, reusable,
  and of high quality.
- OCE provides economic information and enhances NCUA's understanding of emerging microeconomic and macroeconomic risks, by producing meaningful and robust modeling and risk identification tools.

# Human Capital:

Through various working groups, including the technology development team, staff from all offices contribute to the implementation of tools and models to evaluate and assess system-wide risks. In addition, OCIO's information technology project managers plan, direct, and coordinate the development of tools and models to address the increasing demands for in-depth analytical resources to support the examination program.

# Information Technology:

In addition to existing tools and models, NCUA's Information Technology Prioritization Council (ITPC) supports the development of the following software investments to evaluate and assess system-wide risks:

- Expansion of NCUA's business intelligence tools and data analytics to strengthen analysis and reporting and standardizing NCUA data.
- Redesign of NCUA's automated examination system as described under Strategic Objective
   1 2
- Modernize NCUA's credit union call reporting system as described under Strategic Objective 4.2.

#### Performance Goal 1.3.1

Employ business intelligence tools to identify and monitor risks to the credit union industry.

#### *Indicators*

- 1. Expand business intelligence tools and data analytics to strengthen reporting services and risk monitoring, by 2016Q4.
- 2. Publish quarterly 5300 Call Report data within 45 days of <u>credit union submission deadline</u>.

## **Strategic Objective 1.4**

Be prepared for and promote awareness of critical risk issues, emerging technologies, and related threats.

NCUA participates on two critical interagency groups designed to prepare the financial sector for and promote awareness in the financial sector of critical risk issues and related threats – the FFIEC and FBIIC. The FFIEC Cybersecurity and Critical Infrastructure Working Group (CCIWG) was created to enhance communication among the FFIEC member agencies and build on existing efforts to strengthen the activities of other interagency and private sector groups. In addition, the FFIEC began assessing and enhancing the state of the industry preparedness and identifying gaps in the regulators' examination procedures and training that can be closed to strengthen the oversight of cybersecurity readiness. The FBIIC's mission is to work with appropriate members of financial institution regulatory agencies, coordinate efforts to improve the reliability and security of financial information infrastructure. Appendix C discusses cybersecurity threats and the actions NCUA is taking to address these threats in more detail.

Participation in interagency groups better prepares NCUA and the credit union system to address critical risk issues. The agency's Risk Forum, comprised of senior executives, enhances awareness of the macro risks facing the system and develops proactive strategies to address identified threats and integrate organizational improvements. OCE provides economic information and enhances the agency's understanding of emerging microeconomic and macroeconomic risks. NCUA's Office of Continuity and Security Management (OCSM) provides an important link between the intelligence community and the credit union system, by establishing NCUA threat analysis processes and working with the intelligence community and other partners to provide context to reporting on threats to the credit union sector.

OSCUI provides training and consulting services to low-income designated credit unions, minority designated credit unions, and credit unions with less than \$100 million in assets to ensure these credit unions are aware of, and prepared to address, critical risks and related threats.

The agency will continue to promote awareness of critical risk issues, emerging technologies, and related threats to the credit union system using the following means, strategies and initiatives:

#### *Operational Processes and Strategies:*

- Conduct quality control reviews of trending and risk analyses to identify critical risks and related threats.
- Distribute ONES' Payment Newsletter to all NCUA staff and SSAs periodically throughout the year to promote awareness of critical risks, emerging technologies, and related threats.
- Review regulations and internal policies on data security.
- Continue to evaluate emerging risks, including threats to cybersecurity, through qualitative and quantitative analysis.



• Communicate strategies to address critical risk issues, emerging technologies and related threats to NCUA staff and the credit union system.

## Human Capital:

NCUA will establish a cyber threat working group to share and analyze threat information, and develop a standard for reporting and analyzing cyber related incidents at credit unions.

# Information Technology:

NCUA will continue to enhance its ability to evaluate risk through continual improvements to tools and reports.

#### Performance Goal 1.4.1

Identify regional and national emerging risks requiring necessary actions.

#### **Indicators**

1. Publish NCUA Quarterly U.S. Map Reviews on the NCUA website, which identify regional and national risks.

## Performance Goal 1.4.2 (Agency Priority Goal)

Issue industry guidance related to emerging cybersecurity risks and related threats.

#### **Indicators**

1. Train all examiners on the FFIEC Cybersecurity Assessment Tool and implement use of the tool into examination procedures by 2016Q3.

#### Performance Goal 1.4.3

Provide training in emerging technologies, especially for field and management staff.

#### **Indicators**

1. Review and assess training needs to ensure information on emerging technologies is current and placed on the learning management system for IT SMEs, and all examination staff, by 2016Q4.

#### Performance Goal 1.4.4

Assist small and low-income credit unions to secure the proper technology and resources to ensure regulatory compliance and avoid any potential negative threats.

#### **Indicators**

- 1. Award at least 35 percent of CDRLF funds to first-time applicants, annually.
- 2. Produce five new training modules and 12 webinars for the credit union industry, targeting small credit unions.

# Strategic Objective 1.5

Increase ability to manage risk through an effective examination and supervision program that minimizes loss to the NCUSIF.

With the continuing changes in the credit union system, NCUA has shifted its focus on the size, scale, and scope of credit union examinations. NCUA's ONES is responsible for the oversight of the largest and most complex credit unions, and NCUA has adopted a streamlined examination program for financially and operationally sound credit unions with assets less than \$30 million. These two initiatives increase the agency's ability to manage risks in all of its insured institutions. In addition, NCUA's NSPM establishes national policies, procedures, and guidelines for effective supervision of credit unions and, modernizations to the examination report better clarify priority exam action items, reduce redundancy, and ensure consistency.

NCUA will continue to minimize losses to the NCUSIF by managing risks in the credit union system using the following means, strategies and initiatives:

Operational Processes and Strategies:

- Ensure prompt and efficient resolution actions when appropriate.
- Effectively manage assets acquired from liquidations and manage recoveries for the NCUSIF.
- Implement additional changes to the examination and supervision program to further align resources with risk.

#### Human Capital:

NCUA continues to hire and train new examiners to ensure effective credit union supervision and examination.



# Information Technology:

NCUA will continue using its online learning management system to facilitate training and to increase staff efficiency.

# Performance Goal 1.5.1

Maintain yearly NCUSIF losses as a percentage of total insured shares.

## Indicators

1. Maintain NCUSIF losses at less than 0.03 percent of total insured shares, annually.

# Performance Goal 1.5.2

Minimize total assets in CAMEL Code 4/5 rated credit unions.

#### Indicators

1. Achieve a declining trend in the total assets of CAMEL Code 4/5s year over year.

# **Strategic Goal 1: Summary Performance Indicators and Targets**

Goal	Indicator	2013 Actual	2014 Actual	2015Q2 Actual	Target
1 1 1	Aggregate net worth.	10.7%	10.93%	10.92%	> 10%
1.1.1	Aggregate corporate leverage ratio.	7.1%	7.71%	7.74%	> 5 %
1.1.2	Maintain NCUSIF losses in problem credit unions at less than 0.03 percent of total assets in problem credit unions.	0.0137%	0.0144%	0.0110%	< 0.03%
1.1.3	Examine all FCUs by December 31 annually	99.7%	99.9%	49.7%	Achieve
1.1.4	Examine all FISCUs > \$250 million by December 31 annually	100%	100%	53.0%	Achieve
	Incorporate approved interest rate risk criteria into supervision policies that specify potential PCA remedies for high risk institutions.	N/A	N/A	N/A	2016Q4
1.2.1	Issue enhanced examiner guidance on interest rate risk management; including sensitivity analysis and evaluation of quantitative risk measurements. Conduct training and outreach communications throughout 2016.	N/A	N/A	N/A	2016Q4
	Review and assess all capital plans and stress tests for credit unions with assets greater than \$10 billion, within timeframes outlined in regulation.	N/A	Regulation Established	Achieved	Achieve
	Develop plan and initiate first phase of incorporating an IRR sensitivity component ("S") into the exam rating system (CAMELS).	N/A	N/A	Assessment Completed	2016Q4
1.2.2	Initiate acquisition and develop an actionable roadmap and plan for modernizing NCUA's examination system.	N/A	N/A	Business Case Completed	2016Q4
1.3.1	Expand business intelligence tools and data analytics to strengthen reporting services and risk monitoring.	N/A	N/A	Developed Initial Reports	2016Q4
	Publish quarterly 5300 Call Report data within 45 days of credit union submission deadline.	Achieved	Achieved	Achieved	≤ 45 days
1.4.1	Publish NCUA Quarterly U.S. Map Reviews on ncua.gov.	4	4	2	4
1.4.2	Train all examiners on the FFIEC Cybersecurity Assessment Tool and implement into examination procedures.	N/A	N/A	Tool Released	2016Q3
1.4.3	Conduct annual review of emerging technology training needs and deliver materials to IT SMEs and all staff on the learning management system.	Achieved	Achieved	Achieved	2016Q4
	Award 35 percent of CRDLF funds to first-time applicants.	51%	60%	72%	≥ 35%
1.4.4	Produce 5 new training modules and 12 webinars for the credit union industry, targeting small credit unions.	19	22	18	17
1.5.1	NCUSIF losses at less than 0.03 percent of total insured shares.	0.008%	0.005%	0.001%	< 0.03%
1.5.2	Declining trend in total assets of Code 4/5s.	-27.4%	-10.3%	0.45%	< 0%



# **Strategic Goal 2: Promote Consumer Protection and Financial Literacy**

Strategic Objectives	Performance Goals		
2.1 Establish a framework of well-	2.1.1 Collaborate and consult with other federal regulators on consumer financial protection issues and potential regulations.		
balanced regulations and policy statements.	2.1.2 Solicit information on potential abusive or deceptive practices through various outreach efforts.		
2.2 Ensure federally insured credit	2.2.1 Complete the risk-based fair lending exam procedures and exam scoping steps to measure credit union compliance with consumer financial protection regulations.		
unions comply with rules and regulations established to protect consumers.	2.2.2 Ensure quality control reviews of fair lending examination reports highlight potential consumer compliance issues and follow-up for needed corrective actions.		
	2.2.3 Increase guidance to the credit union industry to help reduce the number of compliance violations.		
2.3 Develop and promote financial literacy education programs to	2.3.1 Monitor issues or trends in consumer complaints to develop effective financial literacy education programs and initiatives ( <i>Agency Priority Goal</i> ).		
empower consumers to make informed financial decisions.	2.3.2 Partner with outside resources to effectively market the availability of financial literacy programs.		
	2.4.1 Notify credit unions of their eligibility for low-income status.		
2.4 Promote access to federally insured financial services for consumers of all backgrounds and income levels.	2.4.2 Continue to increase usability and contemporary information on MyCreditUnion.gov, including Pocket Cents.		
	2.4.3 Increase availability of non-English materials on NCUA websites.		
2.5 Review marketing and business plans of community charters to ensure progress toward meeting stated goals.	2.5.1 Ensure community charter penetration rate, loans, shares, and other member services are consistent with credit union submitted community charter business plans.		
2.6 Educate credit unions about consumer compliance issues.	2.6.1 Use all available delivery channels to provide information on consumer compliance related guidance and information.		

The Director of the Office of Consumer Protection (OCP) is the goal leader for Strategic Goal 2 and the underlying objectives.

Strategic Goal 2 seeks to ensure a regulatory framework exists to provide consumers appropriate and timely disclosures, sufficient protections against unscrupulous products or services, and financial literacy education programs to help consumers make informed financial decisions.

OCP is responsible for overseeing NCUA's fair lending, consumer protection and access, chartering, and field of membership programs and policies. OCP also focuses on providing information directly to consumers on MyCreditUnion.gov.

The NCUA Board and program staff continue to create an environment allowing credit unions to better serve their members while maintaining safety and soundness of the system. It is NCUA's objective to protect consumer rights and member deposits by establishing appropriate regulations, enhancing consumer confidence, and providing financial literacy and education. To this end, NCUA will:

- Collaborate with the other federal regulatory agencies as appropriate, to maintain a safe and sound regulatory environment to protect consumers using credit union products and services.
- Support credit unions in their efforts to offer essential products and services, including financial education programs to all eligible members, especially those of modest means.
- Structure the CDRLF to emphasize credit union outreach and financial services to lowincome communities.
- Uphold public confidence in the NCUSIF.
- Review credit union compliance with their community charter business plan.
- Use all available media outlets to promote consumer rights.

These strategies, including the following objectives and performance goals support NCUA's goal of promoting consumer protection and financial literacy.

# **Strategic Objective 2.1**

Establish a framework of well-balanced regulations and policy statements.

NCUA collects information related to consumer compliance violations and concerns during examinations, and coordinates with other financial regulators to develop policy, regulation and guidance. As part of the FFIEC Taskforce on Consumer Compliance and the Financial Literacy Education Commission (FLEC), NCUA contributes to developing well-balanced regulations and policy statements related to consumer protection and financial literacy. NCUA will continue these efforts through the following means, strategies, and initiatives:

## Operational Processes and Strategies:

- Solicit information related to consumer compliance violations and concerns during quarterly
  calls with consumer compliance subject matter examiners and through examiner inquiries to
  guide the development of consumer alerts.
- Actively participate on FFIEC working groups and in FLEC meetings.
- Continue to ensure regulations and policy statements are well formulated and minimize regulatory burden.



# Human Capital:

NCUA will continue to use existing staff and responsibilities to establish a framework of well-balanced regulations and policy statements.

## Information Technology:

NCUA anticipates no need for new information technology.

## Performance Goal 2.1.1

Collaborate and consult with other federal regulators on consumer financial protection issues and potential regulations.

#### **Indicators**

1. Participate in all FFIEC Taskforce on Consumer Compliance Meetings.

## Performance Goal 2.1.2

Solicit information on potential abusive or deceptive practices through various outreach efforts.

#### **Indicators**

1. Request information from regions on potential abusive or deceptive practices, semi-annually.

## **Strategic Objective 2.2**

Ensure federally insured credit unions comply with rules and regulations established to protect consumers.

NCUA's fair lending examination program is designed to ensure credit unions comply with the rules and regulations established to protect consumers. NCUA will continue to ensure credit unions comply with consumer protection rules and regulations using the following means, strategies, and initiatives:

#### Operational Processes and Strategies:

- Maintain the consumer compliance regulatory resource page on ncua.gov.
- Provide timely guidance to the credit union system and examiners related to changes in rules and regulations established to protect consumers.
- Perform fair lending examinations.

# Human Capital:

Staff in OCP's Division of Consumer Compliance Policy and Outreach are responsible for consumer protection compliance policy and rulemaking, fair lending examinations, interagency coordination on consumer protection compliance matters, and outreach. NCUA will continue to train field examination staff so they are fully knowledgeable on consumer compliance regulations and their effective implementation.

## Information Technology:

OCE will provide offsite modeling to assist with the selection of fair lending examinations and offsite fair lending supervision. NCUA will continue to use AIRES for fair lending examinations.

## Performance Goal 2.2.1

Complete the risk-based fair lending exam procedures and exam scoping steps to measure credit union compliance with consumer financial protection regulations.

#### **Indicators**

- 1. Complete 25 fair lending examinations, annually.
- 2. Complete 40 offsite fair lending supervision contacts, annually.

## Performance Goal 2.2.2

Ensure quality control reviews of fair lending examination reports highlight potential consumer compliance issues and follow-up for needed corrective actions.

#### **Indicators**

1. Complete quality control reviews on all fair lending examinations conducted between the fourth quarter of 2015 and the third quarter of 2016.



#### Performance Goal 2.2.3

Increase guidance to the credit union industry to help reduce the number of compliance violations.

#### **Indicators**

1. Conduct one webinar with the credit union industry, as part of indicator 3.4.2, on financial consumer protection law changes.

# **Strategic Objective 2.3**

Develop and promote financial literacy education programs to empower consumers to make informed financial decisions.

OCP maintains its focus on empowering consumers to make informed financial decisions by developing and promoting financial literacy education. OCP responds to inquiries from credit unions, credit union members, and consumers involving consumer protection and share insurance matters. OCP also processes member complaints filed against federal credit unions. In 2015, NCUA revised the way it handles consumer complaints. The revised process was communicated to all stakeholders through Letter to Credit Unions 15-CU-04, *Improving the Process for Consumer Complaints*.

NCUA will continue developing and promoting financial literacy education programs through the following means, strategies, and initiatives:

#### *Operational Processes and Strategies:*

- Produce a monthly report on the top ten aggregate consumer complaints received in the Consumer Assistance Center to guide educational program development.
- Monitor consumer complaints and fair lending examination results to guide educational program development.
- Foster established relationships and focus on increasing the use of NCUA financial literacy materials.
- Engage with additional external parties to promote the use of NCUA's financial literacy tools.

# Human Capital:

Staff in OCP's Division of Consumer Affairs are responsible for handling member complaints and congressional inquiries, interagency coordination on consumer protection issues, financial literacy and outreach programs, and maintaining the consumer website, MyCreditUnion.gov.

## Information Technology:

NCUA modernized its Consumer Assistance Center's complaint management system to streamline the complaint process.

# Performance Goal 2.3.1 (Agency Priority Goal)

Monitor issues or trends in consumer complaints to develop effective financial literacy education programs and initiatives.

#### **Indicators**

1. Conduct quarterly reviews of the top ten consumer complaints to ensure existing and planned education programs align with complaint trends.

#### Performance Goal 2.3.2

Partner with outside resources to effectively market the availability of financial literacy programs.

#### **Indicators**

1. Coordinate with other FLEC agencies and non-profits on four consumer focused outreach activities.

#### **Strategic Objective 2.4**

Promote access to federally insured financial services for consumers of all backgrounds and income levels.

NCUA strives to promote access to credit union services for consumers of all backgrounds and income levels. To support this endeavor, NCUA strives to foster the preservation and growth of small credit unions. Additionally, OCP's Division of Consumer Access is responsible for chartering new credit unions, and reviewing applications by existing credit unions for charter conversions, bylaw amendments, field of membership expansions, and low-income designations.

To reduce the burden of providing consumer access to federally insured financial services, the NCUA Board approved a final rule authorizing Federal Credit Unions to add 12 categories of associations to their fields of membership without having to document how the association meets regulatory criteria, as outlined in Letter to Federal Credit Unions, 15-FCU-03, *How to Add Associations to Your Field of Membership*.

Credit unions with low-income designations are eligible for grants and loans. Credit unions with less than \$100 million in assets are eligible for OSCUI's consulting, training, and partnership and outreach initiatives.



NCUA also promotes access to financial services through its consumer education focused website MyCreditUnion.gov. This site, available in both English and Spanish, provides a one-stop financial information toolbox for adults and children. NCUA will continue to promote access to federally insured financial services for all consumers using the following means, strategies, and initiatives: *Operational Processes and Strategies*:

- Review and approve viable new credit union charters, as quickly as possible.
- Provide credit unions newly qualifying for a low-income designation with notification of their eligibility.
- Encourage greater use of CDRLF to bolster services to low-income members.
- Enhance education and outreach services to credit union boards and management.
- Foster partnerships with organizations that offer programs focused on the underserved community.
- Promote OSCUI programs to assist credit unions with providing access to financial services.
- Collaborate with OCIO to regularly update and expand the content of NCUA's consumer websites.

## Human Capital:

NCUA will continue to use existing staff in OCP's Divisions of Consumer Access to promote access to financial services. Additionally, NCUA's field of membership working group continues its work in providing additional regulatory relief.

#### Information Technology:

NCUA will replace its field of membership legacy application as outlined in Strategic Objective 4.2. IT resources are required to continue to update and maintain MyCreditUnion.gov, including Pocket Cents.

#### Performance Goal 2.4.1

Notify credit unions of their eligibility for low-income status.

#### **Indicators**

- 1. Notify credit unions newly qualifying for low-income status of their eligibility, semi-annually.
- 2. Make a determination on completed Field of Membership expansion applications within an average of 60 days.

#### Performance Goal 2.4.2

Continue to increase usability and contemporary information on <u>MyCreditUnion.gov</u>, including Pocket Cents.

#### **Indicators**

1. Increase the number of visitors to MyCreditUnion.gov, including Pocket Cents year over year.

#### Performance Goal 2.4.3

Increase availability of non-English materials on NCUA websites.

#### **Indicators**

1. Release all consumer focused videos with Spanish subtitles by 2016Q4.

## Strategic Objective 2.5

Review marketing and business plans of community charters to ensure progress toward meeting stated goals.

Community chartered credit unions are required to develop marketing and business plans during the application for a new or expanded community charter, as outlined in NCUA's Chartering and Field of Membership Manual. NCUA will review these business plans periodically after approval to ensure achievement of the objectives, including providing services to consumers in the new or expanded field of membership. NCUA will continue to review business plans of community charters to ensure progress toward the business plan's goals using the following means, strategies, and initiatives:

## Operational Processes and Strategies:

- Continue to follow-up with federal credit unions on the implementation of their business plan every year for three years after receiving a new or expanded community charter.
- Increase partnership and outreach efforts to provide more opportunities for credit unions to learn about and participate in programs to enhance their service delivery or improve operations.

# Human Capital:

NCUA staff will continue to contribute to meeting this objective as part of the supervision program.

#### Information Technology:

No additional information technology required.



#### Performance Goal 2.5.1

Ensure community charter penetration rate, loans, shares, and other member services are consistent with credit union submitted community charter business plans.

#### *Indicators*

1. Compile regional reports assessing compliance with marketing and business plans submitted to support recent community charter actions, semi-annually.

#### Strategic Objective 2.6

Educate credit unions about consumer compliance issues.

NCUA informs and educates credit unions on a variety of issues through various reports, Letters to Credit Unions, live webinars, and videos. Educating credit unions on consumer compliance issues aligns with NCUA's vision statement and furthers the purpose of Strategic Goal 2.

NCUA will continue educating the credit union system about consumer compliance issues through the following means, strategies, and initiatives:

Operational Processes and Strategies:

- Engage with the credit union system about consumer compliance matters.
- Provide consumer compliance educational materials to credit union staff.

## Human Capital:

NCUA will continue to use existing staff and responsibilities to achieve this strategic objective.

*Information Technology*:

Resources will be needed to develop additional videos.

#### Performance Goal 2.6.1

Use all available delivery channels to provide information on consumer compliance related guidance and information.

#### **Indicators**

1. Develop four consumer protection series videos in 2016, to include videos on fair lending and field of membership.

# **Strategic Goal 2: Summary Performance Indicators and Targets**

Goal	Indicator	2013 Actual	2014 Actual	2015Q2 Actual	Target
2.1.1	Participate in all FFIEC Taskforce on Consumer Compliance Meetings.	83%	100%	100%	Achieve
2.1.2	Request information from regions on potential abusive or deceptive practices.	N/A	2	1	2 Requests
	Complete 25 fair lending examinations.	25	25	7	≥ 25
2.2.1	Complete 40 offsite fair lending supervision contacts.	45	40	7	≥ 40
2.2.2	Complete quality control reviews on all fair lending examinations conducted between the fourth quarter of 2015 and the third quarter of 2016.	Achieved	Achieved	Achieved	2016Q4
2.2.3	Conduct webinar with industry on financial consumer protection law changes.	N/A	Achieve	Achieved	1
2.3.1	Conduct quarterly reviews of top 10 consumer complaints to ensure existing and planned education programs align with complaint trends.	N/A	N/A	N/A	4
2.3.2	Coordinate with other FLEC agencies and non-profits on consumer focused outreach activities.	cies and non-		N/A	4 joint activities
2.4.1	Notify credit unions newly qualifying for low-income status of their eligibility, semi-annually.	1	3	1	2
2.4.1	Make a determination on completed FOM applications.	N/A	N/A	49 days	Average 60 days
2.4.2	Increase the number of visitors to MyCreditUnion.gov including Pocket Cents year over year.	332,596	564,970	386,937	700,000
2.4.3	Release all consumer focused videos with Spanish subtitles	N/A	N/A	N/A	2016Q4
2.5.1	Compile regional reports assessing compliance with marketing and business plans submitted to support recent community charter actions.	Achieved	Achieved	1	2
2.6.1	Develop four consumer protection series videos in 2016, to include videos on fair lending and field of membership.	N/A	4	1	4



# Strategic Goal 3: Further Develop a Regulatory Environment that is Transparent and Effective, with Clearly Articulated and Easily Understood Regulations

Strategic Objectives	Performance Goals
	3.1.1 Update existing and develop new regulations through the annual regulatory review process.
3.1 Reduce unnecessary obstacles to credit union competitiveness through modernized regulations.	3.1.2 Coordinate with congressional committees on priority risk issues.
	3.1.3 Identify industry risks necessitating new or revised regulations in industry guidance.
3.2 Collaborate with other regulators to discuss strategies and goals for implementing new or revised regulations.	3.2.1 Actively participate in financial regulators meetings to contribute to the development and implementation of industry guidance.
3.3 Maintain a regulatory environment that safeguards member interests and stability in the credit union system.	3.3.1 Provide sufficient comment periods when introducing new or revised regulations and consider public comments when finalizing regulations.
	3.4.1 Develop guidance to credit unions to provide explanation of regulatory changes and best practices for implementation ( <i>Agency Priority Goal</i> ).
3.4 Enhance NCUA's communication with credit unions through transparent regulations and guidance.	3.4.2 Increase target audience awareness of regulatory activities and their positive effects on the industry's safety and soundness.
2-8 8	3.4.3 Issue information on new and changed regulations through multiple delivery channels including the NCUA website, Twitter, Facebook, LinkedIn, and YouTube.

NCUA's General Counsel is the goal leader for Strategic Goal 3 and the underlying objectives.

NCUA strives to effectively manage the balance between regulatory flexibility and responsible oversight. NCUA's goal is to issue simple, clear, and straightforward regulations while addressing emerging issues before they become major problems.

NCUA continues to improve the effectiveness and transparency of its regulations by increasing communications with credit unions and examiners, as well as the means used to communicate, to ensure greater transparency and fair application of these regulations. The NCUA Board continues its regulatory modernization strategy, which strives to reduce the regulatory burden on credit unions while balancing safety and soundness of the system. The NCUA Board will continue to pursue ways to streamline regulations and reduce regulatory burdens, while still maintaining appropriate safety and soundness.

# **Strategic Objective 3.1**

Reduce unnecessary obstacles to credit union competitiveness through modernized regulations.

NCUA continues its regulatory modernization efforts through its practice of reviewing one-third of its regulations annually, including publishing them for public comment, and updating and streamlining regulations where necessary. NCUA also performed a review of its regulations in a manner consistent with the Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA). The purpose of this review was to identify outdated, unnecessary, or unduly burdensome regulations and consider how to reduce regulatory burden on insured depository institutions while, at the same time, ensuring their safety and soundness and the safety and soundness of the financial system.

As a result of these regulatory modernization initiatives, NCUA recently:

- Issued a final rule eliminating the cap on fixed assets, replacing the limit with clearer guidance for credit unions to set their own limits and operate safely and soundly.
- Eased the burden on small credit unions by raising the threshold for regulatory flexibility from \$50 million to \$100 million.
- Issued a final rule to modernize the risk-based capital requirements for complex credit unions and better protect the credit union system and shield the NCUSIF from losses.
- Authorized federal credit unions to automatically add 12 categories of associations to their fields of membership as outlined under strategic objective 2.4.
- Revised the agency's delegations of authority to streamline the process for granting or amending community charters that involve a population of more than one million.
- Issued a proposal to extend share insurance coverage to certain types of escrow accounts.
- Issued a proposed revision to NCUA's Member Business Loan rule which would give federally insured credit unions greater flexibility and autonomy in safely and soundly offering member business loans.
- Issued a proposed rule to provide a measure of regulatory relief which would give federal credit unions more choices when investing in bank notes.

# Operational Processes and Strategies:

NCUA will conduct its annual review using the following means, strategies, and initiatives.

- By early January 2016, identify the one-third of NCUA's regulations up for review in 2016.
- Post the list on NCUA's website and invite public comment on the regulations to be received by August 2016.
- The Office of General Counsel (OGC) will review the submitted comments and report to the NCUA Board.



 The NCUA Board will consider changes recommended by comment letters and NCUA staff in late 2016 and 2017.

### Human Capital:

Staff from NCUA's Office of General Counsel will continue to support this strategic objective.

### *Information Technology:*

No additional information technology is immediately required.

# Performance Goal 3.1.1

Update existing and develop new regulations through the annual regulatory review process.

#### **Indicators**

1. Review one-third of all regulations, annually.

# Performance Goal 3.1.2

Coordinate with congressional committees on priority risk issues.

#### **Indicators**

1. Send letters to the Chairmen and Ranking Members of primary committees and subcommittees of jurisdiction about NCUA's legislative priorities, and conduct follow-up meetings with key congressional staff, as warranted.

# Performance Goal 3.1.3

Identify industry risks necessitating new or revised regulations in industry guidance.

#### **Indicators**

1. Hold semi-annual Risk Forum meetings to discuss risks and develop action plans to address risks identified following each meeting.

# Strategic Objective 3.2

Collaborate with other regulators to discuss strategies and goals for implementing new or revised regulations.

NCUA participates on various councils and interagency groups responsible for regulating the financial system. Frequently, revised regulations and interagency guidance on current risk issues are developed by task forces and working groups, and issued to all insured financial institutions.

Operational Processes and Strategies:

- Participate in development of financial system regulations and guidance as applicable to credit unions.
- Participate in monthly and periodic council, task force, and working group meetings.
- Coordinate guidance development and issuance through various program offices.

### Human Capital:

NCUA staff throughout the agency actively participate in interagency working groups, committees and councils and are involved in the related guidance development process.

Information Technology:

No addition information technology is required.

#### Performance Goal 3.2.1

Actively participate in financial regulators meetings to contribute to the development and implementation of industry guidance.

#### **Indicators**

1. Participate in all interagency meetings including FSOC, FFIEC, and related Councils, Task Forces, and Subcommittees. Actively participate in the development process on all applicable guidance.

#### **Strategic Objective 3.3**

Maintain a regulatory environment that safeguards member interests and stability in the credit union system.

The NCUA Board is concerned with balancing safety and soundness with the credit union system's competitive needs to maintain viability and stability.



# Operational Processes and Strategies:

New or revised rules and regulations are generally issued for a minimum of 30 days for public comment; most are issued for 60 days for public comment. NCUA evaluates and considers comments received from stakeholders to understand the impact regulations may have on credit union operations.

Human Capital:

NCUA will continue to use existing staff to achieve this strategic objective.

Information Technology:

No additional information technology is required.

#### Performance Goal 3.3.1

Provide sufficient comment periods when introducing new or revised regulations and consider public comments when finalizing regulations.

#### **Indicators**

1. Provide a minimum comment period of 30 days for new and revised regulations.

# **Strategic Objective 3.4**

Enhance NCUA's communication with credit unions through transparent regulations and guidance.

NCUA will maintain open and transparent communications with credit unions to help increase their understanding and implementation of regulations and NCUA initiatives.

# Operational Processes and Strategies:

In order to assist in regulation comprehension, NCUA will continue presenting informative webinars regarding recent risk issues and relevant guidance. The agency will continue producing YouTube videos addressing NCUA Board actions, economic data, and regulatory information. NCUA will also continue to issue its monthly NCUA Report, which highlights important NCUA Board actions and key issues that credit unions need to know.

# Human Capital:

Staff in the office of Public and Congressional Affairs (PACA) in coordination with other NCUA offices, such as OSCUI and OCP develop communications and guidance for the credit unions system.

# Information Technology:

Available technologies such as webinars, websites, and social media will be used to increase credit union access to NCUA Board actions, economic data, and regulatory information. NCUA is also looking to deliver a mobile version of the NCUA Report to increase the publication's accessibility.

# Performance Goal 3.4.1 (Agency Priority Goal)

Develop guidance to credit unions to provide explanation of regulatory changes and best practices for implementation.

#### **Indicators**

1. Issue appropriate guidance such as Letters to Credit Unions, Supervisory Letters, Webinars, AIRES questionnaires, or other multi-media outreach in conjunction with regulatory changes issued by the Board when warranted.

### Performance Goal 3.4.2

Increase target audience awareness of regulatory activities and their positive effects on the industry's safety and soundness.

### **Indicators**

- 1. Produce at least 32 virtual events or videos for the credit unions industry in 2016, to include a webinar on financial consumer protection law changes as outlined in Performance Goal 2.2.3, the small credit union webinars and training videos outlined in Performance Goal 1.4.4, and the consumer protection videos found in Performance Goal 2.6.1.
- 2. Increase the number of online and mobile page views of monthly NCUA Report newsletters by five percent.

# Performance Goal 3.4.3

Issue information on new and changed regulations through multiple delivery channels including the NCUA website, Twitter, Facebook, LinkedIn, and YouTube.

#### **Indicators**

1. NCUA will use social media channels to communicate each rule change as warranted.



# **Strategic Goal 3: Summary Performance Indicators and Targets**

Goal	Indicator	2013 Actual	2014 Actual	2015Q2 Actual	Target
3.1.1	Review one-third of all regulations, annually.	1/3	1/3	1/3	1/3
3.1.2	Send letters to the Chairmen and Ranking Members of primary committees and subcommittees of jurisdiction about NCUA's legislative priorities, and conduct follow-up meetings with key congressional staff as warranted.	N/A	Achieved	Scheduled 2015Q3	2016Q4
3.1.3	Hold semi-annual Risk Forum meetings to discuss risks and develop action plans to address risks identified following each meeting.	N/A	Achieved	1 Meeting YTD	2
3.2.1	Participate in all interagency meetings.	N/A	94%	98%	Achieve
3.3.1	Provide a minimum comment period of 30 days on new and revised regulations.	Achieved	Achieved	Achieved	Achieve
3.4.1	Issue appropriate guidance in conjunction with regulatory changes issued by the board when warranted.	N/A	Achieved	Achieved YTD	Achieve
3.4.2	Produce virtual events or videos for the credit union industry.	17	33	15	32
3.4.2	Increase the number of online and mobile page views of monthly NCUA Report newsletters.	N/A Achieved 2015Q3  N/A Achieved 1 Meeting YTD  N/A 94% 98%  Achieved Achieved Achieved  N/A Achieved Achieved YTD	+5%		
3.4.3	Use social media channels to communicate each rule change as warranted.	N/A	Achieved	Achieved	Achieve

# Strategic Goal 4: Cultivate an Environment that Fosters a Diverse, Well-Trained and Motivated Staff

Strategic Objectives	Performance Goals	
4.1 Develop and maintain the optimal	4.1.1 Use all available delivery channels to educate staff on new and updated guidance and regulations.	
knowledge, skills, and abilities of the agency's workforce to meet emerging needs.	4.1.2 Deliver quality training consistent with the various staff areas of discipline.	
	4.2.1 Develop specialized systems, tools, and models to create a more effective examination program.	
4.2 Enhance staff effectiveness and efficiency through the use of technology.	4.2.2 Deliver leading edge information technology hardware and software to maximize staff efficiency.	
	4.2.3 Increase virtual, remote and telework employee efficiency through the use of current technology.	
4.3 Recruit and retain a well-diversified and	4.3.1 Increase the number of women, persons with disabilities, and minority staff at all levels particularly in the management ranks ( <i>Agency Priority Goal</i> ).	
highly qualified workforce that reflects the relevant labor force.	4.3.2 Partner with organizations to increase the diversity of NCUA staff, particularly management.	
	4.3.3 Fill vacancies timely with the best-qualified applicants available.	
4.4 Maintain an effective plan of succession to	4.4.1 Capture valuable institutional knowledge of retiring senior executives.	
ensure continuity of leadership throughout all levels of the organization.	4.4.2 Enhance leadership training programs to provide continued education for all levels of staff.	
4.5 Improve NCUA's internal communication,	4.5.1 Provide clear and timely communication between all levels of staff.	
both horizontally and vertically.	4.5.2 Coordinate agency communications to maintain consistent strategic messaging.	
	4.6.1 Solicit staff input on areas requiring attention.	
4.6 Enhance NCUA's position as one of the	4.6.2 Strive to balance organizational needs with comparability with the other financial regulatory agencies in the areas of pay and benefits.	
4.6 Enhance NCUA's position as one of the best places in the government to work.	4.6.3 Streamline operation policies and practices to reduce administrative burden for all staff.	
	4.6.4 Strengthen the security program in the areas of personnel, facilities, continuity of operations and secure communications (Agency Priority Goal).	



NCUA's Deputy Executive Director is the goal leader for Strategic Goal 4 and the underlying objectives.

NCUA's most important resource is high quality, skilled staff. To maximize their contributions to the mission, they must be supported by efficient and effective processes and have the proper tools and leading edge technology.

With the goal of cultivating an environment that fosters a diverse, well-trained and motivated staff, Strategic Goal 4 reaches across the organization. Goal 4 emphasizes staff effectiveness through hiring, training, diversity, and career development. It also focuses on maintaining sufficient levels of communication and preparing staff to assume additional responsibilities and duties in leadership positions. The goal also covers the need for strong security programs and other high quality administrative and support functions for all staff.

# **Strategic Objective 4.1**

Develop and maintain the optimal knowledge, skills, and abilities of the agency's workforce to meet emerging needs.

To properly supervise federally insured credit unions, staff must be trained to have the requisite skills and abilities to identify and mitigate risk. Providing ongoing training in identified emerging risk areas is necessary to maintain an effective examination process. In addition to providing ongoing training for generalist examiners in identified emerging risk areas, NCUA has also realigned resources to acquire specialists with focused expertise. NCUA also holds webinars and produces videos as necessary to highlight regulatory changes, and provide training on required examination processes.

#### *Operational Processes and Strategies:*

- Continue providing training on a timely basis to help staff understand emerging risk areas and mitigation strategies. Incorporate staff feedback to improve future training.
- Use the ONES IT and Payments Newsletter to deliver current information to NCUA and SSA staff on emerging IT and payment systems risks.
- Hold 2016 National Exam Program Training to provide training to staff on emerging risk areas, such as cybersecurity, interest rate risk, and credit risk.

# Human Capital:

An Office of Human Resources (OHR) position responsible for assisting with coordination and delivery of NCUA training classes will be added to ensure NCUA and SSA examiners are provided adequate training to maintain an effective examination program.

# *Information Technology:*

NCUA will use technology support to improve training efficiencies with video teleconferencing and web conferencing.

# Performance Goal 4.1.1

Use all available delivery channels to educate staff on new and updated guidance and regulations.

#### *Indicators*

1. Hold webinars with NCUA staff on significant regulatory changes.

# Performance Goal 4.1.2

Deliver quality training consistent with the various staff areas of discipline.

#### **Indicators**

1. Obtain at least a 4.4 out of 5 average rating in training class evaluations.

# **Strategic Objective 4.2**

Enhance staff effectiveness and efficiency through the use of technology.

Staff significantly relies upon technology to perform their duties and responsibilities associated with their positions. The technology needs to be at a level appropriate to carry out the agency's mission. In order to create additional efficiencies, administrative tasks need to be streamlined through the use of new programs.

*Operational Processes and Strategies:* 

- Continue making technological hardware and software improvements as required to maintain a high performing staff.
- Work with program offices to develop any necessary programs to improve staff's ability to identify industry risks.

# Human Capital:

NCUA's Information Technology Prioritization Council (ITPC) comprised of office and regional directors review and prioritize software initiatives and align IT investments with NCUA's mission. NCUA's Enterprise Data Integrity Program Working Group comprised of representatives from across the regions and offices ensures mission-critical data is commonly understood, reusable, and of high quality.



As described under Strategic Objective 1.2, NCUA will add an information technology project manager to plan, direct, and coordinate the multi-year modernization of NCUA's automated examination management system.

# *Information Technology:*

NCUA has several major information technology initiatives underway to support this objective:

- Modernizing the automated examination system, as described in strategic objective 1.2.
- Enhancing NCUA's business intelligence tools, as described in strategic objective 1.3.
- Modernizing the call reporting system.
- Modernizing the field of membership application.
- Completing the replacement of a system that supports administrative functions, such as human resource data.

# Performance Goal 4.2.1

Develop specialized systems, tools, and models to create a more effective examination program.

#### **Indicators**

1. Initiate acquisition and develop an actionable roadmap and plan for modernizing NCUA's call reporting systems by 2016Q4.

# Performance Goal 4.2.2

Deliver leading edge information technology hardware and software to maximize staff efficiency.

#### **Indicators**

1. Modernize the field of membership application to provide enhanced customer service upgrades and inform credit union officials, through an automated process, the status of pending applications by 2016Q4.

#### Performance Goal 4.2.3

Increase virtual, remote and telework employee efficiency through the use of current technology.

#### **Indicators**

1. Increase virtual, remote, and telework employee efficiency by implementing video teleconference technology capabilities and increase the usage by 2016Q2.

# **Strategic Objective 4.3**

Recruit and retain a well-diversified and highly qualified workforce that reflects the relevant labor force.

NCUA incorporates the principles of diversity as one of its core values. These principles serve as the foundation for building an inclusive environment where the talents of all individuals are fully utilized. When applied effectively, these principles create a workforce where employees not only succeed, but are provided the opportunity to reach their fullest potential. NCUA has established a Diversity Advisory Council to support the agency's diversity goals, serve as a resource to assist and advise decision-makers on diversity and inclusion efforts, and ensure the goals established in NCUA's Diversity and Inclusion Plan are met.

Developing a well-diversified and highly qualified workforce begins during recruitment. NCUA is committed to filling vacancies timely with the best-qualified applicants available.

Operational Processes and Strategies:

- Evaluate the best approaches for implementing diversity objectives.
- Develop strategies to address low participation rates of identified groups.
- Address and eliminate barriers to equal employment opportunity where low participation exists.
- Provide diversity training to all NCUA employees.
- Publish advertisements in circulars that target diverse communities.

# Human Capital:

No additional human capital is required.

Information Technology:

No additional information technology is required.

#### Performance Goal 4.3.1 (Agency Priority Goal)

Increase the number of women, persons with disabilities, and minority staff at all levels particularly in the management ranks.

#### **Indicators**

1. Maintain NCUA's position in the top five mid-sized agencies for the Support for Diversity Indicator (Employee Viewpoint Survey Questions 34, 45, and 55). These questions measure



- the extent to which employees believe that actions and policies of leadership and management promote and respect diversity.
- 2. Maintain NCUA's position in the top six agencies in its size category for OPM's New Inclusion Quotient (IQ). The New IQ identifies behaviors that help create an inclusive environment.

# Performance Goal 4.3.2

Partner with organizations to increase the diversity of NCUA staff, particularly management.

#### **Indicators**

1. Establish at least one new diversity-related recruitment outreach relationship with a professional organization or educational entity to broaden NCUA's exposure to applicants from all segments of society.

# Performance Goal 4.3.3

Fill vacancies timely with the best-qualified applicants available.

#### Indicators

1. Fill vacancies within an average of 70 days from vacancy announcement closing date.

#### **Strategic Objective 4.4**

Maintain an effective plan of succession to ensure continuity of leadership throughout all levels of the organization.

Human capital is the agency's most important resource. NCUA must be prepared to pursue other opportunities as staff retire or leave their positions. Planning for succession will help determine knowledge, skills, and abilities necessary to fill critical staff positions.

*Operational Processes and Strategies:* 

- Evaluate the leadership programs available to staff and make changes as necessary.
- Track the success of graduates from the leadership programs into leadership positions.
- Cultivate talent by providing training, mentoring, detail assignments, and other leadership development opportunities.
- Implement management development program recommendations to improve employee retention, particularly for mid-career hires.

Facilitate leadership transition by striving for an overlap between the incumbent and the retiring senior executive.

### Human Capital:

No additional human capital is necessary.

*Information Technology:* 

NCUA will be implementing exit strategy software to capture valuable information/knowledge from departing employees.

# Performance Goal 4.4.1

Capture valuable institutional knowledge of retiring senior executives.

#### **Indicators**

1. Implement exit strategy software to capture valuable information/knowledge from departing employees by 2016Q2.

#### Performance Goal 4.4.2

Enhance leadership training programs to provide continued education for all levels of staff.

#### **Indicators**

1. Conduct post-program reviews of management and executive development programs in coordination with oversight committees and participant supervisors at the conclusion of each program.

# Strategic Objective 4.5

Improve NCUA's internal communication, both horizontally and vertically.

NCUA leadership understands the importance of keeping all staff informed of major issues internal and external to the agency. Communications will continue to be enhanced using the following means, strategies, and initiatives.

*Operational Processes and Strategies:* 

- Empower employees by maintaining the partnership council relationship with the National Treasury Employees Union (NTEU).
- Offer webinars, teleconferences, and timely emails to improve communications with staff.
- Send regulatory and policy action briefings to staff prior to external release.
- Publish the Inside NCUA Weekly newsletter to keep staff apprised of changes and issues.



# Human Capital:

Continue providing resources for the internal communications working group and partnership council.

Information Technology:

Use available technology to communicate information to staff and allow for interaction and feedback.

# Performance Goal 4.5.1

Provide clear and timely communication between all levels of staff.

#### *Indicators*

1. Publish weekly Inside NCUA communication emails.

# Performance Goal 4.5.2

Coordinate agency communications to maintain consistent strategic messaging.

#### Indicators

1. Conduct, and implement results of, Plain Writing Act reviews of the top 50 most viewed pages on ncua.gov, by 2016Q4.

# Strategic Objective 4.6

Enhance NCUA's position as one of the best places in the government to work.

NCUA leadership recognizes the agency needs its most important resource, its people, in order to meet its goals and mission. To this end, NCUA's Internal Communications Working Group (ICWG) and Partnership Council both provide venues for agency staff to provide input on areas within NCUA needing improvement. Leadership is committed to creating an environment that fosters a diverse, well-trained, and motivated staff.

NCUA has also committed to strengthening its security program and communications. The Office of Continuity and Security Management (OCSM) began operation in 2014 and is responsible for the following programs: continuity of operations and emergency management, physical security, personnel security, and national security and intelligence.

# Operational Processes and Strategies:

- Evaluate the results of the Employee Viewpoint Survey in particular areas. Make changes as necessary to address lower scoring areas.
- Continue to hold quarterly webinars with all NCUA staff
- Promote the use of forums such as the Partnership Council and ICWG to bring matters to the attention of management.
- Strengthen NCUA's security programs and communications.
- Strengthen NCUA's emergency management program through the development of an emergency management instruction and accompanying guidance.
- Survey the regional offices to determine ways to improve the safety of staff.
- Develop guidance for emergency management for remote and field staff.

### Human Capital:

OCSM will be hiring additional personnel in 2016 to support NCUA's security programs.

### Information Technology:

NCUA's ITPC prioritizes information technology needs to improve agency efficiencies. Hardware and software updates will continue to maintain secure communications and staff efficiencies.

#### Performance Goal 4.6.1

Solicit staff input on areas requiring attention.

#### **Indicators**

1. Maintain NCUA's Federal Employee Viewpoint Survey Employee Engagement Index at 72 percent.

#### Performance Goal 4.6.2

Strive to balance organizational needs with comparability with the other financial regulatory agencies in the areas of pay and benefits.

#### **Indicators**

1. Fully implement the negotiated Complete Collective Bargaining Agreement (CBA) pay system by 2016Q4.



# Performance Goal 4.6.3

Streamline operation policies and practices to reduce administrative burden for all staff.

#### **Indicators**

1. Reduce or eliminate at least two administrative management requirements.

# Performance Goal 4.6.4 (Agency Priority Goal)

Strengthen the security program in the areas of personnel, facilities, continuity of operations and secure communications.

#### **Indicators**

- 1. Migrate NCUA's technology infrastructure from the legacy data center to a modern, completely redundant, and secure data center facility by 2016Q2.
- 2. Maintain a favorable response rate of 70 percent or above for NCUA's Federal Employee Viewpoint Survey Question 36 "My organization has prepared employees for potential security threats."

# **Strategic Goal 4: Summary Performance Indicators and Targets**

Goal	Indicator	2013 Actual	2014 Actual	2015Q2	Target	
4.1.1	Hold webinars with NCUA staff on significant regulatory changes.	Achieved	Achieved	Achieved	Achieve	
4.1.2	Obtain at least a 4.4 out of 5 average rating in training class evaluations.	4.1	4.47	4.34	≥ 4.4	
4.2.1	Initiate acquisition and develop an actionable roadmap and plan for modernizing NCUA's call report system.	N/A	N/A	N/A	2016Q4	
4.2.2	Modernize the field of membership application.	N/A	N/A	N/A	2016Q4	
4.2.3	Increase virtual, remote, and telework employee efficiency by implementing video teleconferencing technology capabilities and increasing usage.	N/A	N/A	N/A	2016Q2	
	Maintain NCUA's position in the top five mid- sized agencies for the Support for Diversity Indicator (Employee Viewpoint Survey Questions 34, 45, and 55).	$4^{ m th}$	5 <sup>th</sup>	N/A	Top 5	
4.3.1	Maintain NCUA's position in the top six agencies in its size category for OPM's New Inclusion Quotient (IQ). The New IQ identifies behaviors that help create an inclusive environment.	PM's New v IQ identifies 6th 4th 6th sive		6th	Top 6	
4.3.2	Establish at least one new diversity-related recruitment outreach relationship with a professional organizational or educational entity	1	1	N/A	1	
4.3.3	Fill vacancies within an average of 70 days from vacancy announcement closing date.	N/A	76	62	70	
4.4.1	Implement exit strategy software to capture valuable information/knowledge from departing employees.	N/A	N/A	N/A	2016Q2	
4.4.2	Conduct post-program reviews of management and executive development.	N/A	N/A	Achieved	2016Q4	
4.5.1	Publish weekly Inside NCUA communication emails.	52	51	26	52	
4.5.2	Conduct, and implement results of, Plain Writing Act reviews of the top 50 most viewed pages on ncua.gov.	reviews of the top 50 most viewed N/A N/A N/A		N/A	2016Q4	
4.6.1	Maintain NCUA's Federal Employee Viewpoint Survey Employee Engagement Index at 72 percent.	70%	72%	72%	≥ 72%	
4.6.2	Fully implement the negotiated Collective Bargaining Agreement (CBA) pay system	N/A	Negotiations Commenced	CBA Signed	2016Q4	
4.6.3	Reduce or eliminate at least two administrative management requirements.	2	2	3	2	



Goal	Indicator	2013 Actual	2014 Actual	2015Q2	Target
	Migrate NCUA's technology infrastructure from the legacy data center to a modern, completely redundant, and secure data center facility	N/A	N/A	N/A	2016Q2
4.6.4	Maintain a favorable response rate of 70 percent or above for NCUA's Federal Employee Viewpoint Survey Question 36 "My organization has prepared employees for potential security threats."	60%	63%	76%	≥ 70%

# **Management Review**

NCUA uses a quarterly data driven review process. Each designated goal leader is responsible for the progress in meeting the goals, reporting the results, and making operational adjustments. These reviews are coordinated by the Office of the Chief Financial Officer.

# **Program Evaluation and Research**

NCUA will use the results of the quarterly reviews and its annual performance report as a data point for future development of the strategies, goals, measures, and targets. For this Plan, each office provided their analysis and support for each performance goals. Several performance goal indicators in this Plan are new for 2016 and 2017; therefore, historical data is not available. These indicators are marked as N/A in the Summary Performance Indicator and Target tables. The results from the quarterly reviews and these evaluations will be included as some of the factors considered in determining NCUA's Plan.

# **Data Management and Reliability**

Data management and data reliability are important in determining performance outcomes. Currently, the data is reviewed by OEI, ONES, OCE and the regions. In 2016, NCUA has budgeted for improvements to its data management system including the development of business intelligence tools. Combined with an enterprise data integrity program, data storage will be expanded and analysis and reporting strengthened.

Data provided by NCUA during the financial statement audits provides another level of assurance. The NCUA Chairman deems the data as current, reliable and accurate to support NCUA's performance results and the annual plans.



# **Lower-Priority Program Activities**

The President's Budget identifies the lower-priority program activities, as required under the GPRA Modernization Act, 31 U.S.C. 1115(b)(10). The public can access the volume at: <a href="http://www.whitehouse.gov/omb/budget">http://www.whitehouse.gov/omb/budget</a>.

# **Hyperlinks**

NCUA Strategic Plan, 2014 through 2017

**NCUA Budget Documents** 

**Interest Rate Risk Resources** 

**Cybersecurity Resources** 

**Consumer Compliance Regulatory Resources** 

**NCUA Diversity and Inclusion Strategic Plan** 

# Appendix A – Budgetary Requirements by Strategic Goal

FY 2016 Budgeted Dollars by Strategic Goal (in Millions)									
Strategic Goal 1		Strategic	Goal 2	Strategic	Goal 3	Strategic	Total		
Dollars	Percent	Dollars	Percent	Dollars	Percent	Dollars	Percent	Dollars	
\$206.39	70.94%	\$17.63	6.06%	\$10.14	3.49%	\$56.75	19.51%	\$290.9	
	FY 2016 Projected FTE by Strategic Goal								
Strateg	Strategic Goal 1 Strategic Goal 2 Strategic Goal 3 Strategic Goal 4 Total								
FTE	Percent	FTE	Percent	FTE	Percent	FTE	Percent	$FTE^2$	
1017	82.09%	76	6.15%	39	3.14%	107	8.62%	1239	
The office	The offices of Board, OED, OIG and OCFO are allocated across all Strategic Goals.								

FY 2016 Capital Acquisition Dollars by Strategic Goal (in Millions)										
Strategic Goal 1 Strategic Goal 2 Strategic Goal 3 Strategic Goal 4 Total						Total				
Dollars	Percent	Dollars	Percent	Dollars	Percent	Dollars	Percent	Dollars		
\$5.0	\$5.0 49.82% \$1.8 17.38% \$0.0 0.0% \$3.3 32.80% \$10.1									

<sup>&</sup>lt;sup>2</sup> NCUA's 2016 FTEs of 1,247 are funded by three different sources. The Central Liquidity Facility funds 3.5 FTEs and the Temporary Corporate Credit Union Stabilization Fund funds 5 FTEs. NCUA's Operating Fund funds the remaining 1,239.5 FTEs.



# Appendix B – Performance Management Programs Process

NCUA's performance management programs process begins with the agency's strategic plan that provides long-term strategic goals for the agency and serves as the cornerstone of the performance management process. The Plan serves as the agency's operational plan. It outlines NCUA's annual (short-term) objectives, strategies, and corresponding performance goals that contribute to accomplishing the established strategic goals. Goal accomplishment is evaluated through the use of performance indicators each quarter. At the end of each Plan period, a formal analysis of performance is documented in the Performance Results Summary of the Annual Report which includes performance indicator results, an analysis of agency program performance and factors that may have affected goal achievement. OMB evaluates the effectiveness of NCUA's programs and performance management process.

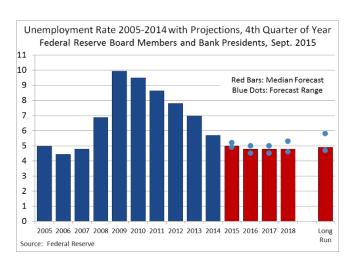
As part of the 2016-2017 planning effort, NCUA conducted a review of performance indicators and made a distinction between *Strategic* measures and *Operational* measures for reporting purposes. Strategic measures are developed by leadership and subject matter experts to best communicate the value delivered to our stakeholders, framed in terms of results related to NCUA's strategic foundation. These indicators will continue to be published in NCUA's Annual Report and Annual Performance Plan. Operational measures are those managed at the program level, and contain detailed information on how operations are performing. These measures are used to manage activities and processes and provide input to course correction adjustments as necessary. These measures will not be externally published, but instead will be tracked internally within NCUA and used to identify opportunities for improvement. NCUA's Strategic and Operational performance indicators integrate to measure progress toward performance goals and contribute to the accomplishment of our mission.

# **Appendix C – External Factors 2016 and 2017**

The economic environment will continue to be a major influence on credit union performance over the next few years. Current near-term forecasts call for moderate economic growth and improvement in labor markets.<sup>3</sup> Although this helps to support credit union lending activity and credit quality, the expected improvement in the U.S. economy may also result in interest rates moving away from their post-recession lows. The ability of credit unions to manage interest rate risk in a rising rate environment is likely to become increasingly important for their success. In the very near term, the continued weakness in the global economy and in commodity markets, along with a strong dollar, might slow the pace of overall economic growth. Although these factors appear unlikely to completely derail U.S. growth, they could reduce activity in manufacturing-intensive and oilproducing states. Credit unions with membership in these sectors may face slow growth in deposits and loan demand and, potentially, higher levels of loan delinquency. The threat of cyber-attacks and other operational risks will continue to underscore the need for credit unions to understand and address risks introduced by the growing dependence on technology. Longer-term trends, such as the increasing concentration of lending in new loan types, the introduction of alternative loan and deposit products, the ongoing demographic and field of membership changes, and continued industry consolidation will remain part of the backdrop facing credit unions going forward.

# **Economy and Credit Unions**

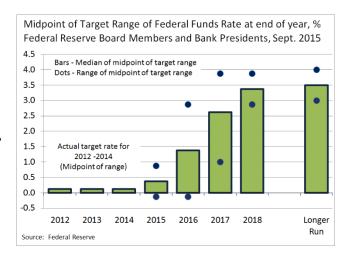
The U.S. economy is expected to continue to strengthen in the next two years, with economic growth moving back toward its long-term trend. Labor and housing markets are expected to grow at a moderate pace, and inflation should remain relatively low. The stronger economy will be positive for credit union lending and membership growth, as well as credit quality. However, as the economy continues to grow, labor markets tighten and inflation increases, interest rates are likely to rise back to more "normal" levels.



<sup>&</sup>lt;sup>3</sup> Based on the latest forecasts available at the time of this report's release: September 2015 Federal Reserve's economic forecast.



The latest projections from Federal Reserve policymakers indicate that the federal funds rate may start rising in late 2015 and continue increasing through at least 2018. The median midpoint of the federal funds rate target range across policymakers anticipates that the rate will increase to almost 1.4 percent by the end of 2016, reach 2.6 percent by the end of 2017 and 3.4 percent by the end of 2018. For some credit unions, rising interest rates might result in reduced earnings, lower asset valuations, and liquidity stress.

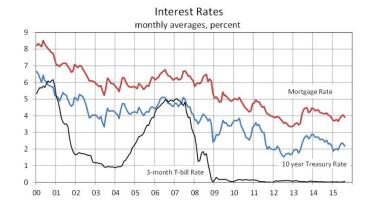


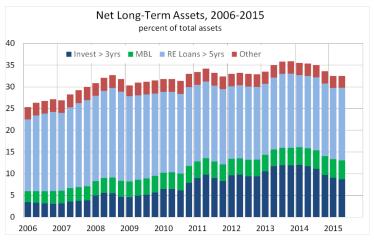
#### **Interest Rate Risk**

Overall interest rate movements in 2016 and 2017 are likely to be dominated by the transition to a more normal environment. This transition will affect both the level of interest rates and the shape of

the yield curve –the relative level of rates for short-term securities versus longer-term bonds. Reflecting the technological changes of the past decade, the transition will be occurring in an environment where consumers can move their funds quickly and easily across institutions and at a time when they are have many new alternatives for payment. Credit unions ability to appropriately manage and mitigate interest rate risk will become increasingly important to their success.

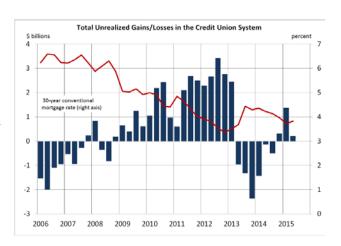
The low interest rate environment of the recent years led some credit unions to use their investment portfolio to boost earnings by lengthening the term of investments. This "reaching for yield" can exacerbate interest rate risk and make the transition to a higher interest rate environment more difficult. For example, the share of investments with greater than three years' maturity has increased dramatically from 2006, rising from three percent to 12 percent at the end of 2013. While the share has moderated and started





to reverse in recent quarters as loan growth has accelerated, the exposure remains elevated.

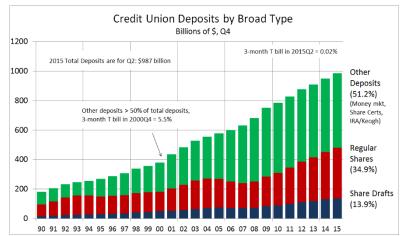
Some indication of the rate sensitivity of credit union investment portfolios can be observed in the impact of rising rates in 2013. The modest rise in interest rates in 2013Q2 and Q3 had a dramatic impact on unrealized gains and losses in credit union investment portfolios. Between 2013Q1 and 2013Q4, an unrealized gain of nearly \$2.5 billion turned into an unrealized loss of \$2.4 billion. As long-term rates fell in 2014, credit union investment portfolios returned to a more neutral gain/loss territory. If long-term rates rise as forecasted, unrealized losses are likely to grow again during the next few years.



The transition to a more normal interest rate environment will also be difficult for credit unions that have significant portfolios of fixed-rate assets and rate-sensitive deposits. Both of these segments have experienced substantial growth in recent years.

When short-term interest rates increase, credit unions generally raise deposit rates to match or exceed market rates; the adjustment is faster and more complete in account types that have, in the past, shown more sensitivity to market rates. These would include share certificates, money market accounts and other similar accounts. In addition, historically, when short-term interest rates have increased, credit union members have moved more of their deposits into the more interest ratesensitive accounts. When the Federal Reserve raised short-term interest rates beginning in 2004 and ending in 2008, the share of one-year certificate of deposits as a share of total credit unions deposits

increased substantially. This suggests that members may be more ratesensitive and demand higher rates on deposits as the economy enters a period of rising rates. In a rising rate environment, credit unions with ratesensitive deposits and fixed-rate assets may come under multiple stresses as fixed-rate assets lose value, deposit rates rise, liquidity decreases and earnings are compressed by lower net interest margins.





#### Risks to the U.S. Forecast

Although the consensus forecast calls for the U.S. economy to continue strengthening in the next couple of years, the weakness in global economic growth, led by China – the second largest economy in the world – could act as a drag on U.S. growth. A higher exchange value of the dollar and relatively low oil prices are also a negative for the manufacturing-intensive regions and oil-producing states. These headwinds for the U.S. economy are likely to continue into 2016 and 2017 and will be especially important for credit unions with membership in the affected sectors.

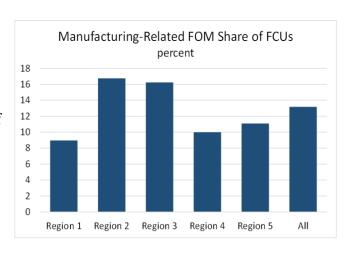
Slowdown in China: China has been growing rapidly for at least two decades, with growth centered on construction, manufacturing, and capital investment. China is now the second largest economy in the word, trailing only the U.S, and the largest user of a variety of industrial commodities. Growth has weakened in China at least partly because it is trying to transition to a more consumer- and service-oriented economy. As a result, manufacturing and construction, the two high-growth sectors in China, have slowed dramatically in the past year. This sharp slowdown has hurt the economies of the countries that supply industrial commodities to China. For many supplying economies, this decline represents a steep reduction in their export revenues which is causing their economies to contract. Thus, the slowdown in China has affected the U.S. economy through two channels. It has hurt demand for U.S. products directly, as it accounts for between five and ten present of the U.S. exports. It also hurt exports indirectly, by causing slowdowns or declines in U.S. trading partners.

<u>Oil-Producing States:</u> Although lower oil prices are generally positive for non-oil producers and consumers, not everybody benefits from falling oil prices. Declining oil prices have been a negative for oil-producing states, with substantial declines in their pace of economic growth and employment in oil-related industries. Forecasters generally believe oil prices will stabilize and start to rise in the next few years, however, relatively low oil prices will continue to be a drag on oil-producing states during that time.<sup>4</sup>

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<sup>&</sup>lt;sup>4</sup> According to the September 2015 Wall Street Journal's Economic Survey, the average forecasted price for crude oil is about \$48 per barrel at the end of 2015 and \$56 per barrel at the end of 2016.

Manufacturing: Over the past year, the U.S. dollar has increased in value by about 25 percent against a basket of developed-country currencies. A stronger dollar makes the U.S. exports more expensive and therefore harder for U.S. producers to compete against both importers and producers of similar goods in other countries. In addition, the economic slowdown in the rest of the world, especially in U.S. trading partners, is reducing demand for U.S. imports, further affecting manufacturing.



### **Cyber Security**

Over the past several years, a major development in the external environment facing credit unions has been the growing threat of technology-based attacks on the individual institutions and on the infrastructure of the financial system more generally. Despite improving network defenses and user awareness, cyber threats to the financial sector are increasing in frequency, scale, sophistication, and severity of impact. The ranges of cyber threat actors, methods of attack, targeted systems, and victims are also expanding.

The Financial Stability Oversight Council (FSOC), of which the NCUA Chairman is a member, continues to highlight the importance of improving cybersecurity to combat both the growing risks to individual institutions and financial market infrastructure. Events in 2015 showed a continuation of sophisticated attacks aimed at stealing sensitive consumer data including healthcare and financial services. The growing importance of cyber threats suggests credit unions will need to devote resources to enhance their cybersecurity systems and develop plans that allow for the orderly response and recovery to a significant cyber incident.

In its 2015 Annual Report, the FSOC identified cybersecurity risks posed by cross-sector dependencies, the reliance on interconnected systems across firms, markets, and service providers, and a compromised supply chain. The FSOC was most concerned with the possibility of a destructive malware attack against the financial sector which could impair financial sector operations. As a result of its analysis, the FSOC recommended several technical and administrative best practices to mitigate the potential damage from future cyber incidents, including establishing a robust system controls for third-party vendors, protecting administrative access and developing response and recovery capabilities. In addition, the FSOC recommended additional enhancement to cybersecurity information sharing between the private and public sector.

To address this ever-increasing cyber threat, NCUA has established a Cyber Threat Working Group to work on cyber issues such as detecting emerging threats, enhancing information sharing, identifying mitigation measures and improving response and resiliency efforts. In addition, we are developing protocols to receive and share intelligence reports on cyber threats, which we are now receiving directly from the Department of the Treasury, the Federal Bureau of Investigation, and the



Department of Homeland Security.

NCUA has worked to align the agency's efforts with the FFIEC initiatives through the Cybersecurity and Critical Infrastructure Working Group. We continue to work collaboratively with our FFIEC and Financial and Banking Information Infrastructure Committee (FBIIC) counterparts to encourage credit unions to join the Financial Services Information Sharing and Analysis Center and similar organizations. NCUA has also deployed a comprehensive cybersecurity resources page on our website, and we are in process of enhancing and tailoring the content for institutions of all sizes and their service providers.

# Other Emerging Risk Areas for Credit Unions:

<u>Lending trends:</u> Increasing concentrations in new types of lending, including member business loans and private student loans, emphasize the need for long-term risk diversification and effective risk management tools and practices, along with expertise to properly manage the increasing concentrations of risk.

Membership trends: Demographic and field of membership changes are likely to continue to result in declining membership at many credit unions (membership declined at more than half of credit unions in the year ending in 2015Q2). All credit unions need to consider whether their product mix is consistent with their members' needs and demographic profile. For example, in some areas, to be effective, credit unions may need to explore how to meet the needs of an aging population or of a growing Hispanic population.

<u>Alternative loan/depository institutions:</u> New financial products that mimic deposit and loan accounts, such as Apple Pay and Walmart pre-paid cards, are emerging. As these institutions and products gain popularity, credit unions may have to be more active in marketing and rethink their business models.

<u>Smaller credit unions challenges and industry consolidation</u>: Small credit unions face challenges to their long-term viability for a variety of reasons, including weak earnings, declining membership, high loan delinquencies, and elevated non-interest expenses. If current consolidation trends persist, there will be fewer credit unions in operation and those that remain will be considerably larger and more complex. Increasingly complex institutions will pose management challenges for the institutions themselves, as well as NCUA.