

## **CUSO Registry – Frequently Asked Questions**

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#### General

### What is the CUSO Registry?

The CUSO Registry is a web-based system that credit union service organizations (CUSOs) will use to provide information directly to NCUA. In additional to general information like a CUSO's legal name, address, and contact information, the system will allow CUSOs to provide:

- Information regarding ownership and subsidiaries.
- Services offered by the CUSO, including basic financial information as applicable for specific services.
- Credit union clients served by the CUSO.

### Why do CUSOs have to register with NCUA?

NCUA regulations require federally insured credit unions to enter into a written agreement with a CUSO before investing in or lending to the organization. See §712.3(d) of NCUA's rules and regulations for more information. Changes to the regulation, which went into effect June 30, 2014, require the written agreement to include a provision that the CUSO will report certain financial and operational information to NCUA, and any state supervisory authority, as applicable.

### How often do CUSOs have to report information?

NCUA regulations require CUSO reporting annually. The annual registration and reaffirmation window will remain open February through March each year. Newly formed CUSOs need to register online within 60 days of forming.

## Am I required to use the CUSO Registry to submit my data to NCUA?

Yes. NCUA requires all CUSOs to submit data online.

## What software do I need to use the CUSO Registry?

No special software is required. The CUSO Registry is a web-based application.

## What internet browser is required to use the CUSO Registry?

The CUSO Registry supports the following browsers:

- Microsoft Edge
- Mozilla Firefox
- Google Chrome
- Apple Safari

Older versions of these browsers may work, although webpages may not display or operate as intended.

## Who can see the information a CUSO provides in the CUSO Registry?

Users of the CUSO Registry will see different information depending on which of the following groups they belong to:



User Group Access to View	User Group Access to View
CUSOs and designated CUSO users	CUSO's own records and users
Credit union regulators (NCUA and credit union state supervisory authorities)	All CUSO Registry records
General public	The following information will be released through the CUSO search function:  Legal name and any trade names (DBAs) Services offered Address (physical if different from mailing address) Public website address (if provided by CUSO) Public phone number (if provided by CUSO)

The <u>Freedom of Information Act</u> (FOIA), as well as the applicable exemptions in NCUA's FOIA regulation, apply to any information a CUSO submits to NCUA. CUSO submissions may contain or consist of trade secrets and privileged or confidential commercial or financial information that is subject to withholding under applicable FOIA exemptions.

NCUA also will not release confidential and nonpublic information reported by a CUSO that is contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of NCUA; this information will remain confidential and non-public under applicable FOIA exemptions. NCUA will share information as appropriate regarding CUSOs with those state supervisory authorities that have signed written information sharing agreements with the agency.

## What if I am having a technical problem with the CUSO Registry?

Users can find support in the <u>CUSO Registry User Manual</u> and other quick guides. Additional technical support is available by phone at (800) 827-3255 or by email at <u>OneStop@ncua.gov</u>. The help desk is open from 7:00 a.m. to 8:00 p.m. ET, Monday through Thursday, and 7:00 a.m. to 6:00 p.m. on Friday.

The help desk is closed on <u>federal holidays</u>.

If you are having issues with accessing the system via Login.gov, please contact the Login.gov service desk. Submit a ticket through their online system.

## **User Accounts**

#### Do I have to establish an account to enroll a CUSO?

Yes. Only authenticated users can enroll a CUSO in the system. As of December 2023, all external CUSO Registry users are required to use Login.gov with Multifactor Authentication (MFA) and identity proofing.

Do I have to create an administrator account? Who can I designate as an administrator?



Yes, CUSOs are required to create an administrator account. The initial user who enrolls a CUSO will automatically be designated as the primary administrator. <u>NCUA recommends that</u> you give administrator privileges to at least one more authorized person for back-up purposes.

### How do I set up other users for my CUSO?

Please refer to the <u>CUSO Registry User Manual</u> and related quick guides for information about setting up and managing additional system users.

#### How do I reset my password?

Please visit the Login.gov guidance on how to change your password.

### Can I enroll and view multiple CUSOs under my account?

Yes. The system allows users with administrator privileges to add additional CUSOs to their account.

## Login.gov and Multi-Factor Authentication (MFA)

### What is Login.gov

Login.gov is a secure sign in service used by the public to sign in to participating government agencies. For additional details, please visit <u>Login.gov</u> – <u>What is Login.gov</u>?

#### Why do I have to use Login.gov to access CUSO Registry?

These procedures are part of a broader initiative mandated by the <u>Executive Order on Improving the Nation's Cybersecurity</u> to strengthen cybersecurity across the federal government and here at NCUA.

# What if I do not feel comfortable uploading my personal information to establish a CUSO Registry account?

While the security measures may seem extensive, particularly for organizations handling small amounts of sensitive information that may not seem significant, these procedures are part of a broader initiative mandated by the <a href="Executive Order on Improving the Nation's Cybersecurity">Executive Order on Improving the Nation's Cybersecurity</a> to strengthen cybersecurity across the federal government and here at NCUA. Even seemingly non-sensitive information can be a target for cyber threats, hence the government's move towards a standardized, more secure platform for all interactions.

Here are a few points to address your concerns:

- 1. Adoption of Login.gov: Login.gov, a U.S. General Services Administration (GSA) approved application, is widely used across the federal government for other systems. Learn more about who uses Login.gov <a href="here">here</a>.
- Security vs. Sensitivity: The value of the data isn't always correlated with the need for security. Even non-classified information can be exploited if accessed by malicious entities. The MFA process is not focused on the sensitivity of the data. Rather it



ensures the right person is accessing the information, and only the information for which they are authorized.

- 3. Privacy Protection: We respect your privacy. The information you provide for identity verification is used solely for the purpose of securing your account and ensuring only authorized users have access to the CUSO Registry. Login.gov does not share your sensitive personal information with NCUA. It employs advanced security protocols required by the government to protect your data against unauthorized access. Learn more about the Login.gov security policy here.
- 4. Mandatory Compliance: Unfortunately, there are no alternative options for submission due to the mandated compliance requirements. Failure to provide the required information by the end of the re-affirmation period (February 1 March 31 of each year) will result in your CUSO's record becoming inactive and you will no longer be considered registered with NCUA. The status will only be reactivated once the required information is provided.

We are committed to making this necessary transition smooth and secure for our users while adhering to the new government mandated cybersecurity standards. Thank you for your patience and understanding.

# What if the CUSO Administrators at my organization share a single user account? Can we still share a user account through Login.gov?

All users will need to create your own individual user accounts to access the CUSO Registry application via Login.gov. This is to ensure the security and privacy of your data, as well as to comply with the federal standards for identity proofing and authentication.

**Connecting Your Data to New Individual Accounts**: We understand your concern about the continuity of data linked to your group account. Please be reassured that when you create your individual user accounts, all data and history associated with your current group account will remain accessible and intact. The transition is designed to be seamless, ensuring that all necessary information is carried over to your new individual accounts.

**Assisting with the Transition**: To facilitate a smooth transition, we can proactively associate the email addresses of each user in your department with the CUSO Registry. This preassociation will streamline your first login experience. Once your individual accounts are set up, you will find all your relevant data already linked to these new accounts.

#### **Steps to Create Individual Accounts:**

- 1. Please provide a list of individuals (First and Last Name, email address) in your department who require access to <a href="mailto:onestop@ncua.gov">onestop@ncua.gov</a>. Be sure to include your CUSO name and the purpose of your email.
- 2. We will then pre-associate these emails with the CUSO Registry.
- 3. Each member will receive instructions on how to activate their individual account and set up MFA via login.gov.

# I already have a Login.gov account for personal use. Will I be able to register again with my work email?

Due to the information that is collected by Login.gov for Identify Verification, users cannot have multiple accounts. You can, however, associate as many email addresses to an existing



account as you would like. CUSO Registry will not have access to any email address aside from the one associated with your CUSO.

To add an email address to your account:

- 1. Sign in to your Login.gov account https://secure.login.gov.
- 2. Enter your password and click sign in.
- 3. Click the "Sign in" button.
- 4. Enter your authentication method.
- 5. Once you are on the account page, select "Add email address" from the menu of options under "Your Account".
- Enter the new email address.
- 7. Click the "Submit" button.
- 8. Login.gov will send an email to your newly added email address.
  - o Follow the prompts to confirm your email address.
  - o If you do not confirm your email address, you will not be able to use it with your Login.gov account.
  - o Do not remove the old email address, as this may impact your association/access for other applications not associated with the NCUA.

For additional questions on this process, please contact the Login.gov service desk team.

#### What if I have additional questions regarding Login.gov?

If you have questions about the Login.gov registration process, website, or other details related to Login.gov, please contact the Login.gov service desk.

If you have questions regarding the CUSO Registration application, please contact NCUA's OneStop Help Desk for technical assistance at onestop@ncua.gov.

If you have questions about policy or other information related to NCUA and CUSOs, please contact the NCUA's CUSO Registry team.

## **Screening Process**

## Why do I get a message that I don't have to register as a CUSO?

If you see this message, it means the answers you provided to the screening questions indicate that your organization does not meet the regulatory definition of a CUSO. Only CUSOs are allowed to register in the CUSO Registry. If you believe you should register, please contact NCUA at CUSO Registry mailbox or the Office of Examination & Insurance at (703) 518-6360.

# How should I answer the screening questions if my CUSO does not serve credit unions or their members directly?

If your CUSO is part of a holding company that primarily serves credit unions or credit union members, you should answer the third screening question, "Does your organization primarily serve credit unions or credit union members?" with a "Yes." This will ensure that wholly owned CUSOs, including shell or holding companies, gain access to the registry.

What does "primarily serves" mean in the screening questions?



NCUA's CUSO rule only permits a federally-insured credit union to invest in or loan to a CUSO if the CUSO primarily serves credit unions, its membership, or the membership of credit unions contracting with the CUSO. In addition, the CUSO must be engaged in activities and services related to the routine daily operations of credit unions.

The CUSO rule does not establish a bright-line definition of "primarily serves." NCUA determines whether a CUSO complies with the customer base requirement on a case-by-case basis, using a totality of the circumstances test. For further information, refer to the NCUA legal opinion available online.

#### What is an EIN?

An EIN is the CUSO's Employer Identification Number. EINs are issued by the Internal Revenue Service (IRS). This may also be referred to as your TIN, or Taxpayer Identification Number. To find your EIN, refer to your IRS form SS-4.

### What happens if the CUSO Registry doesn't recognize my EIN?

NCUA validates the identity of all CUSOs that register. If we don't already have your EIN on file, the system will ask the user to provide contact information for an owner credit union, a credit union state supervisory authority, or an owner CUSO that can confirm the identify of your organization. While you can continue entering information in the CUSO Registry, NCUA does not consider a CUSO registered until we confirm the identity of the organization. Once we complete this step, you'll receive an email that provides your permanent registry number.

## Do I need to register with NCUA if I am a subsidiary of a CUSO?

A subsidiary of a CUSO that meets the definition of a CUSO is required to enroll in the registry. Refer to <u>§712.11 of the NCUA rules and regulations</u> if you have questions about CUSO subsidiaries.

# What if a credit union has a loan outstanding or line of credit to my CUSO? Is that the same as a CUSO "owner?"

An outstanding loan to a CUSO does not signify "ownership."

#### Why do I get an address verification error when I try to enter my address?

The system uses a database from the US Postal Service to verify the address. The address verification can fail because it was not entered exactly the way the Post Office has it on file. To check the address and verify that you have entered the correct information, use the United States Post Office online Find a Zip Code feature.

#### How do I know if my CUSO is a "corporate CUSO"?

If your CUSO has an investment from a corporate credit union or one of its subsidiary CUSOs, it is considered a "corporate CUSO". More information regarding resources for Corporate Credit Unions, including Corporate CUSO Activities is available on the <a href="NCUA website">NCUA website</a>.

## **Completing Your Registration**



### Can I save my work and come back to complete it later?

Yes. Once you establish an account you can begin your registration, save your work, log off, and return later. You cannot submit your registration until you complete all required fields and correct any errors. As a security measure, the CUSO Registry auto-saves every ten minutes. We recommend you save frequently ensure the most up-to-date information is retained.

#### What customers am I supposed to report?

You should only report customers that are federally-insured credit unions with whom the CUSO has a contractual relationship to provide services. Do not report other entities (businesses, individuals, etc.) that the CUSO serves.

#### What format should I use to upload/import my credit union customer list?

Please see the <u>CUSO Registry User Manual</u> and <u>Using Schema</u> quick guide for information about how to upload client lists. Please note, if you have a very large customer list, it may take the system a while to process the records.

## If I have both regular and complex services, how do I complete the credit union customer list?

First, select all services your CUSO offers within the Services List. Complex services will require additional input in the Customer List to identify credit unions using those services. You do not need to identify a specific service for customers that do not receive complex services.

### What do I report in the investment amount field on the customer list?

Report the amount that the CUSO has recorded on its books as the credit union's total dollar investment (equity) in the CUSO. If the credit union does not have an investment in the CUSO, enter zero.

### What do I report in the loan amount field on the <u>customer</u> list?

Report the amount of outstanding loan amount(s), available line(s) of credit from the credit union, and/or guarantees(s) the credit union has made to or on behalf of the CUSO. If the credit union does not have a loan TO the CUSO, enter zero. <u>Do not include</u> loan amounts (or, volume of loans) related to lending services provided to the credit union by the CUSO.

#### As a CUSO subsidiary, how should I report my customers?

All CUSOs should report customers at their <u>true</u> relationship level. For example, a credit union may have a CUSO holding company that, in turn, has a subsidiary that provides services to multiple credit unions: the holding company itself does not provide services to any credit unions directly. In this situation, the holding company would indicate only the parent credit union(s) as the customer. The subsidiary CUSO, however, would list the credit unions that receive services directly from the subsidiary.

#### What format should I use to upload/import my owner list?

Please see the <u>CUSO Registry User Manual</u> and <u>Using Schema</u> quick guide for information about how to upload owner lists. Please note, if you have a very large owner list, it may take the system a while to process the records.



### What do I report in the investment amount field on the owner list?

Report the amount that the CUSO has recorded on its books as the credit union's total dollar investment (equity) in the CUSO. If the credit union does not have an investment in the CUSO, enter zero.

#### What do I report in the loan amount field on the owner list?

Report the amount of outstanding loan amount(s), available line(s) of credit from the credit union, and/or guarantees(s) the credit union has made to or on behalf of the CUSO. If the credit union does not have a loan TO the CUSO, enter zero. Do not include loan amounts (or, volume of loans) related to lending services provided to the credit union by the CUSO.

### How do I resolve a technical problem with the upload?

Please see the <u>CUSO Registry User Manual</u> and <u>Using Schema</u> quick guide to make sure your data is in the correct format and for a list of steps to follow.

If you still have problems, please contact the technical support help desk at (800) 827-3255 or by email at OneStop@ncua.gov. The help desk is open from 7:00 a.m. to 8:00 p.m. ET, Monday through Thursday, and 7:00 a.m. to 6:00 p.m. on Friday. The help desk is closed on <a href="federal holidays">federal holidays</a>.

#### How often will I be required to upload my audited financial statements?

CUSOs will upload audited financial statements during the initial enrollment period and annually each following year during the reaffirmation period (February 1 through March 31).

#### What if I don't have a recent audited financial statement?

If you do not have an audited financial statement to upload at the time of submission, please check the appropriate box on the Financial Information page and provide an explanation. You can log back into the system and upload audited financial statements once they are available.

#### How many financial statement files can I upload?

You can only upload only one PDF file that is no bigger than 15MB in size. The system will display the file you uploaded to the right of the upload button upon successful completion. If you inadvertently uploaded the wrong file, you may delete it by selecting the "x" beside the file. Alternatively, you can reupload a new file as the system will automatically replace the one you previously uploaded. Please note that the system will rename your uploaded file to include your CUSO's registry number and the effective date of your audit.

## Should I enter any financial information if I have not yet received an audit?

Yes, you should input the financial information fields for your anticipated audit date. You may leave the audit firm's name field blank if you have not yet engaged an audit firm for the year.

I am a CUSO that is wholly owned by a credit union and do not receive a separate opinion audit. Do I have to upload financial statements?



Yes, a CUSO in this situation should upload financial statements related to their operations. That is, you should only upload the CUSO's portion of the audited financial statements, and not the credit union's consolidated financial statements.

### What information do corporate CUSOs have to upload?

A corporate CUSO is defined as a CUSO that has at least a partial ownership by a corporate credit union. Refer to NCUA.gov for a <u>complete list of corporate CUSO activities</u> and required information.

### How will I know if my CUSO registration was completed successfully?

You will receive an email indicating your registry information was successfully submitted. Your registration is not complete until all errors are cleared and you certify and submit the information.

### Can I print or save a copy of what I submit in the CUSO Registry?

Currently, each page of the registry must be printed separately. You can, however, use the download function to export (see the <u>Download CUSO Information</u> quick guide) and save your CUSO's record. You can also export and save customer lists and owner lists individually.

## **Reaffirming Registry Information**

#### What does "reaffirmation" mean?

Reaffirmation is the annual process of reviewing and updating CUSO Registry information.

### Which CUSOs are required to reaffirm registry information?

All active CUSOs in the registry are required to review and update information during the reaffirmation period which is from February 1 to March 31 of each year.

# What should I do if my registered CUSO closed since the last registration period?

Users that have a registered CUSO that has since closed, dissolved, or is otherwise no longer considered a CUSO by NCUA rules and regulations can update their status during the annual reaffirmation period. Users should log in to the registry between February 1 and March 31 and select "Start Reaffirmation for 201X Year". Once selected, users will see the option to indicate the CUSO's closed status.

# Do I need to "reaffirm" my CUSO if it has gone inactive since the last registration period?

If the CUSO has an outstanding loan or investment from a federally insured credit union, information in the registry should be updated. Users will log in to the registry, begin the reaffirmation process, and update each section of the registry including the general information, services (where users can indicate the CUSO is "inactive"), customer and owner lists.

## How do I reaffirm my Registry Information?



After logging into the system, CUSO Registry users with "Administrator" or "Contributor" roles will see the option to the reaffirm a CUSOs record on their system landing page.

### How often do I need to update my Registry information?

CUSOs are required to reaffirm their Registry information each year (February 1 to March 31) and make corrections as necessary.

## **Amending Registry Information**

### Who can amend a CUSO's registry information?

CUSO Registry users with "Administrator" or "Contributor" roles can amend their CUSO Registry information at any time. Individuals assigned the "Viewer" role cannot edit registry information.

# How can I correct information previously submitted to the CUSO Registry?

You can make an amendment to a current filing at any time after your initial submission; however, CUSO are only required to provide information annually during the reaffirmation period (February 1 through March 31). Once the new filing period opens in February of each year, prior filings cannot be changed. If you need assistance with a prior year filing, please contact <a href="CUSORegistry@ncua.gov">CUSORegistry@ncua.gov</a>.