



# **Privacy Impact Assessment for CUOnline**

Fiscal Year 2026

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## About this Document

A Privacy Impact Assessment (PIA) is an analysis of how PII is handled to ensure that handling conforms to applicable privacy requirements, to determine the privacy risks associated with an information system or activity, and to evaluate ways to mitigate privacy risks. A PIA is both an analysis and a formal document detailing the process and the outcome of the analysis.

Program offices and system owners are required to complete a PIA whenever they develop, procure, or use information technology to create, collect, use, process, store, maintain, disseminate, disclose, or dispose of PII.<sup>1</sup> Completion of a PIA is a precondition for the issuance of an authorization to operate.<sup>2</sup>

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## Basic Information about the System

**System Name:** Credit Union Online CUOnline

**NCUA Office of Primary Interest:** Office of Examination and Insurance

| Threshold                                    |                                                                                                                                                                                                                                                 |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Describe the system in 1-2 sentences.</i> | CUOnline is the electronic system the NCUA uses to collect Call Report and Profile data for OMB-approved NCUA Forms 5300, 5310, and 4501 A. Credit unions, state supervisory authorities, and NCUA employees and contractors access the system. |

| Artificial Intelligence                                                                                                                                                                                                |    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| <b>1</b> <i>Are there Artificial Intelligence (AI) capabilities utilized in this system/ service?</i><br><br><i>AI is defined as a machine-based system that can, for a given set of human-defined objective, make</i> | No |

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<sup>1</sup> 44 U.S.C. § 3501, note; Pub. L. 107-347, § 208(b).

<sup>2</sup> OMB Memorandum M-14-04, *Fiscal Year 2013 Reporting Instructions for the Federal Information Security Act and Agency Privacy Management* (2013).

|  |                                                                                            |  |
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|  | <i>predictions, recommendations or decisions influencing real or virtual environments.</i> |  |
|--|--------------------------------------------------------------------------------------------|--|

## Purpose and Authority

*The NCUA should only create, collect, use, process, store, maintain, disseminate, or disclose PII if it has authority to do so, and such authority should be identified in the appropriate notice.*

*The NCUA should provide notice of the specific purpose for which PII is collected and should only use, process, store, maintain, disseminate, or disclose PII for a purpose that is explained in the notice and is compatible with the purpose for which the PII was collected, or that is otherwise legally authorized.*

| Purpose and Authority |                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1</b>              | <i>What is the purpose of the system?</i>                                                                                                      | <ul style="list-style-type: none"> <li>• Credit union examination, supervision, enforcement action or liquidation.</li> <li>• Credit Union Online or CUOnline is a web-based program used by credit unions to submit and certify regulatory, operational, and financial information to the NCUA. It contains two sections: the Credit Union Profile and Call Report. The Credit Union Profile has different time requirements (i.e. submit within 10 days after a new Chairman) and the Call Report is quarterly.</li> </ul>                  |
| <b>2</b>              | <i>Why is the PII necessary to achieve the purpose described above? Also please indicate if only used for login/account creation purposes.</i> | <p>The PII collected in this system is used:</p> <ul style="list-style-type: none"> <li>• to contact CU officials/representatives for various reasons (i.e. exam related discussions, mailing of an exam report, emergencies, etc.);</li> <li>• to monitor and mitigate risks (i.e. safety and soundness);</li> <li>• for congressional reporting (this pertains to the minority deposit institution question); and</li> <li>• for security requirements to establish CUOnline accounts including the identification of individual</li> </ul> |

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|          |                                                                                                         |                                                                                                                                                                                                                       |
|----------|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                                                         | <p>users, thereby creating the requirement for collection of PII (name and e-mail address).</p> <p>The CUOnline profile data is the NCUA's authoritative source for validating a user's credit union affiliation.</p> |
| <b>3</b> | <i>What is the legal authority to collect, maintain, use, or share the PII contained in the system?</i> | 12 U.S.C. 1751 et seq.                                                                                                                                                                                                |

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## Minimization

*The NCUA should only create, collect, use, process, store, maintain, disseminate, or disclose PII that is directly relevant and necessary to accomplish a legally authorized purpose, and should only maintain PII for as long as is necessary to accomplish that purpose.*

The NCUA recognizes the increased sensitivity of Social Security numbers (SSNs) and therefore makes every effort to limit the collection and maintenance of them. The NCUA also limits its collection of other types of PII to those that are necessary.

| SSNs     |                                                                             |    |
|----------|-----------------------------------------------------------------------------|----|
| <b>1</b> | <i>Will the system collect, maintain, or share social security numbers?</i> | No |

| PII      |                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1</b> | <i>Basic Demographic</i> | <ul style="list-style-type: none"> <li>• Email Address</li> <li>• Fax Number</li> <li>• First Name</li> <li>• Home Address</li> <li>• Last Name</li> <li>• Middle Name (or initial)</li> <li>• Phone Number</li> <li>• Sex</li> <li>• Other: Sex can be derived by the salutation (i.e. male/female is derived from Mr., Ms., Mrs.); Race and Ethnicity data is collected, but not personally attributable; it is attributed to the general</li> </ul> |

|            |                                    |                                                                                                                                                                                                                                                                                                                                                                                             |
|------------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            |                                    | population of eligible members and board members                                                                                                                                                                                                                                                                                                                                            |
| <b>1.1</b> | <i>Whose PII is collected?</i>     | <ul style="list-style-type: none"> <li>• CU Officers, Employees, Volunteers</li> <li>• NCUA Contractors</li> <li>• NCUA Employees</li> <li>• Others: SSA employees (name and email addresses are inherited from NCUA Connect and collected via CUOnline); NCUA Employees/ Contractors (name and email address are inherited through HR databases and not collected via CUOnline)</li> </ul> |
| <b>2</b>   | <i>Medical and Family</i>          | None                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>3</b>   | <i>Financial</i>                   | None                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>4</b>   | <i>Biometric</i>                   | <ul style="list-style-type: none"> <li>• Signature</li> <li>• Other: Electronic signature (check boxed attestation statement and typing name)</li> </ul>                                                                                                                                                                                                                                    |
| <b>4.1</b> | <i>Whose PII is collected?</i>     | <ul style="list-style-type: none"> <li>• CU Officers, Employees, Volunteers</li> </ul>                                                                                                                                                                                                                                                                                                      |
| <b>5</b>   | <i>Employment and Education</i>    | <ul style="list-style-type: none"> <li>• Current Employment Information other than NCUA Employment (such as Occupation, Employer, Work Address, Work Phone, Work Email, Title, Salary)</li> <li>• Other: title and/or roles at the CU</li> </ul>                                                                                                                                            |
| <b>5.1</b> | <i>Whose PII is collected?</i>     | <ul style="list-style-type: none"> <li>• CU Officers, Employees, Volunteers</li> </ul>                                                                                                                                                                                                                                                                                                      |
| <b>6</b>   | <i>Information Technology (IT)</i> | <ul style="list-style-type: none"> <li>• Username</li> <li>• Login/Activity Records</li> <li>• Unique Device Identifier</li> <li>• Tracking Data (Cookies, Web Beacons, geolocator, website engagement, IP Address, etc.)</li> <li>• Other: Username displayed from NCUA Connect Active directory username inherited from NCUA enterprise system(s)</li> </ul>                              |
| <b>6.1</b> | <i>Whose PII is collected?</i>     | <ul style="list-style-type: none"> <li>• CU Officers, Employees, Volunteers</li> <li>• NCUA Contractors</li> <li>• NCUA Employees</li> <li>• Others: SSA employees (name and email addresses are inherited from NCUA Connect and collected via CUOnline), NCUA Employees/ Contractors (name and email address are</li> </ul>                                                                |

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|            |                                |                                                                                                                                               |
|------------|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
|            |                                | inherited through HR databases and not collected via CUOnline)                                                                                |
| <b>7</b>   | <i>NCUA Employment</i>         | <ul style="list-style-type: none"> <li>• NCUA Email Address</li> <li>• Other: Active directory username; role-based security group</li> </ul> |
| <b>7.1</b> | <i>Whose PII is collected?</i> | <ul style="list-style-type: none"> <li>• NCUA Contractors</li> <li>• NCUA Employees</li> <li>• Others: SSA employees</li> </ul>               |

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## Collection and Consent

*The NCUA should create, collect, use, process, store, maintain, disseminate, or disclose PII with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to ensure fairness to the individual.*

*The NCUA should involve the individual in the process of using PII and, to the extent practicable, seek individual consent for the creation, collection, use, processing, storage, maintenance, dissemination, or disclosure of PII. The NCUA should also establish procedures to receive and address individuals' privacy-related complaints and inquiries.*

The NCUA endeavors both to collect information from the subject individual, and to attain affirmative informed consent, whenever possible. The NCUA's use of Privacy Act statements and privacy notices on forms are critical to this effort. For more information see the Transparency section below.

| Collection and Consent |                                                                                                                                                       |                                                                                                                                                                                                        |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1</b>               | <i>What are the sources from which the PII will be collected?</i>                                                                                     | <ul style="list-style-type: none"> <li>• Directly from the individual the information is about</li> <li>• A Credit Union</li> <li>• Existing NCUA information system</li> <li>• Other: SSAs</li> </ul> |
| <b>2</b>               | <i>Will the individuals whose information is collected/maintained in the system consent to their personal information being collected/maintained?</i> | Not specifically, but the individuals consented to providing the information originally and likely anticipated that their information would also be maintained and used this way.                      |
| <b>3</b>               | <i>Will individuals be able to "opt-out" by declining to provide PII or by</i>                                                                        | No                                                                                                                                                                                                     |

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|------------|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | <i>consenting only to a particular use?</i> |                                                                                                                                                                                                                                                                              |
| <b>3.1</b> | <i>Please explain.</i>                      | NCUA users created by default via employee master table and active directory synchronization (updated daily; created as a basic user; any other user role specifically assigned based on need); not all PII collected correlates to a system user(s) (i.e. CU board member). |

## Procedures to Address Individuals' Privacy Related Complaints and Inquiries

The Privacy team knows that complaints, concerns, and questions from individuals can be a valuable source of input that improves operational models, uses of technology, data collection practices, and privacy safeguards. To facilitate this type of feedback, the Privacy team has established the Privacy Complaint Process to receive and respond to complaints, concerns, and questions from individuals about the NCUA's privacy practices. The process is described on the [NCUA's privacy website](#). The Privacy team appropriately records and tracks complaints, concerns, and questions to ensure prompt remediation.

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## Maintenance, Use, Sharing and Security

*The NCUA should establish administrative, technical, and physical safeguards to protect PII commensurate with the risk and magnitude of the harm that would result from its unauthorized access, use, modification, loss, destruction, dissemination, or disclosure.*

The NCUA implements, documents, and tests security and privacy controls as required by applicable NIST and OMB guidance. Access controls are of particular importance with regard to protecting individuals' privacy. Records management, both keeping records for the required time frame and timely destroying or accessioning them, is also a key component of managing privacy risks.

| Maintenance and Use |                                              |                                                                                                                                                            |
|---------------------|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1</b>            | <i>Which statement is most accurate?</i>     | NCUA owns the System.                                                                                                                                      |
| <b>2</b>            | <i>Describe how the role-based access is</i> | CUOnline has a detailed matrix that outlines user roles and permissions. Every user can access PII in the system. CU users can only access PII on their CU |

|            |                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | <i>implemented to safeguard PII in this system/service.</i>                                                                                                                                                                        | <p>contacts tab; SSA users can access PII on all contacts tab for all state-chartered CUs for their state; NCUA users can access all PII in the system for all CUs. Help desk users can access PII for all CUs and also system users.</p> <p>PII is safeguarded for CUs by compartmentalizing each CU into its own security domain. State-chartered CUs are compartmentalized by each state.</p>                          |
| <b>2.1</b> | <i>Based on what was described above, approximately how many individuals have elevated or administrator access to PII? Elevated access includes access that allows individuals to see PII other than their own individual PII.</i> | <p>The following is the count of users with elevated privileges, but none of them can perform system administration/back-end administration type functions:</p> <ul style="list-style-type: none"> <li>• 4 - NCUA Administrators</li> <li>• 37 - Regional Office Administrator</li> <li>• 8 - Help Desk Users</li> <li>• 7 - EI Users</li> <li>• 52 - Field Supervisor User</li> <li>• 168 - SSA Administrator</li> </ul> |

| <b>Sharing and Security</b> |                                                               |                                                                                                                                                               |
|-----------------------------|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1</b>                    | <i>With whom will the information be shared?</i>              | <ul style="list-style-type: none"> <li>• Within NCUA</li> <li>• Other Federal Agencies</li> <li>• Contractors</li> <li>• Other Third Parties: SSAs</li> </ul> |
| <b>2</b>                    | <i>This system will require the following security review</i> | ATO - Authorization to Operate                                                                                                                                |

| <b>Records Management</b> |                                                                                                  |                                                                                                                                                                                                                                                                                                                                        |
|---------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1</b>                  | <i>Which records retention schedule(s) will apply to this system?</i>                            | NCUA Record Schedule - Program Records                                                                                                                                                                                                                                                                                                 |
| <b>2</b>                  | <i>Please specify the records schedule (i.e. GRS 1.1, etc. or N1-413-0X-X Series X, Item X).</i> | <ul style="list-style-type: none"> <li>• 5300 Call Report Data is covered by N1-413-02-2, Series 4, Item b (System Data).</li> <li>• Profile Data is covered by N1-413-02-2, Series 7, Item b (System Data).</li> <li>• 5310 Corporate Credit Union Call Report is covered by N1-413-02-2, Series 7, Items b (System Data).</li> </ul> |

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| Controlled Unclassified Information |                                                                                                                                                           |                                                                         |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| <b>1</b>                            | <i>Does the system/service contain records with CUI?</i>                                                                                                  | Yes                                                                     |
| <b>1.1</b>                          | <i>Are CUI markings utilized in the system/service?</i>                                                                                                   | Yes                                                                     |
| <b>1.1a</b>                         | <i>Select all that apply:</i>                                                                                                                             | <ul style="list-style-type: none"> <li>External Email Banner</li> </ul> |
| <b>1.2</b>                          | <i>Has this system/service been reviewed for security measures that meet CUI safeguarding requirements under 32 CFR § 2002.14, such as an ATO or ATU?</i> | Yes                                                                     |

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## Transparency

*The NCUA should be transparent about information policies and practices with respect to PII, and should provide clear and accessible notice regarding creation, collection, use, processing, storage, maintenance, dissemination, and disclosure of PII.*

The NCUA's transparency efforts include providing adequate notice to individuals prior to collection of their PII. The NCUA achieves this with Privacy Act statements, or privacy notices (the latter if the collection is not associated with a Privacy Act System of Records), and compliance with the Paperwork Reduction Act<sup>3</sup> The NCUA also publishes Systems of Records Notices in the Federal Register and makes them available on [the privacy page of the NCUA's website](#).

| Transparency |                                                                      |                |                                                 |
|--------------|----------------------------------------------------------------------|----------------|-------------------------------------------------|
| <b>1</b>     | <i>Will any forms or surveys be used to collect the information?</i> | Yes            |                                                 |
|              | <b>Title</b>                                                         | <b>OMB No.</b> | <b>Privacy Act Statement or Privacy Notice?</b> |
|              | Form 4501A Profile                                                   | 3133-0204      | Privacy Act Statement                           |
|              | Form 5300                                                            | 3133-0004      | Privacy Act Statement                           |
|              | Form 5310                                                            | 3133-0067      | Privacy Act Statement                           |

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<sup>3</sup> See the Collection and Consent section above.

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|  |                                                                |                |                       |
|--|----------------------------------------------------------------|----------------|-----------------------|
|  | CUO Login - Updated for July 2021 release                      | Not applicable | Privacy Act Statement |
|  | Authorization Agreement for Electronic Funds Transfer Payments | 3133-0135      | Privacy Notice        |

| SORNs    |                                                                             |         |
|----------|-----------------------------------------------------------------------------|---------|
| <b>1</b> | <i>Is the information in the system retrieved by a personal identifier?</i> | Yes     |
| <b>2</b> | <i>Applicable SORN</i>                                                      | NCUA-22 |

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## Accountability

*The NCUA should be accountable for complying with these principles and applicable privacy requirements, and should appropriately monitor, audit, and document compliance. The NCUA should also clearly define the roles and responsibilities with respect to PII for all employees and contractors, and should provide appropriate training to all employees and contractors who have access to PII.*

## Compliance with the Fair Information Privacy Principles

As evidenced by this PIA (and the other information publicly available on the [privacy page of NCUA's website](#)), the NCUA is committed to achieving and maintaining compliance with the Fair Information Privacy Principles.

## Roles and Responsibilities of NCUA Staff

As detailed in the NCUA Acceptable Use Policy and applicable Rules of Behavior, all NCUA staff are responsible for protecting PII from unauthorized exposure and for reducing the volume and types of PII necessary for program functions. Staff must protect all PII that they handle, process, compile, maintain, store, transmit, or report on in their daily work.

To protect PII, staff must use proper collection, storage, transportation, transmission, and disposal methods, must not access PII beyond what they need to complete their job duties, and must not disclose PII to unauthorized parties. Managers are also responsible for providing their subordinates with context-specific practical guidance about protecting PII.

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All NCUA staff are required to review and acknowledge receipt and acceptance of applicable Rules of Behavior upon gaining access to the NCUA's information systems and associated data.

Failure to protect PII may result in administrative sanctions, and criminal and/or civil penalties.<sup>4</sup>

## Training

Together with the Office of Human Resources, the Privacy team ensures that new employees complete mandatory privacy training, and all existing employees and contractor employees complete privacy refresher training once every fiscal year. NCUA staff electronically certify acceptance of their privacy responsibilities as a part of annual privacy refresher training. The Privacy team keeps auditable records of completion of all mandatory trainings.

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## Analysis and Approval

This PIA was approved by or on behalf of the Senior Agency Official for Privacy. Below are additional details regarding the review and approval of the PIA.

| Analysis and Approval        |             |
|------------------------------|-------------|
| <b><i>Privacy Risk:</i></b>  | Acceptable  |
| <b><i>Approval Date:</i></b> | May 8, 2026 |

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<sup>4</sup> 5 U.S.C. § 552a(i)(3); NCUA Computer Security Rules of Behavior.



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