

1. What specific areas of the Call Report/Profile forms do you find challenging to complete? Please describe the nature of those challenges. Show citation box

For loans granted year to date for open-end loans on both page 2 and page 15, it is very challenging to count an advance on a loan as a new loan granted if the loan was originated in a prior year as our system is not able to track this information easily and we must manually calculate this. The unfunded commitment on page 10 can be used to know the CU's unfunded commitment.

On page 2, calculating the interest rate on each loan category is very time consuming since rates vary considerably. We use the most common rate, but we can have 50 loans at 3% and 49 at 10%, so the information is not useful for the amount of time it takes to gather the data.

2. What sections/schedules/items on the Call Report/Profile could be made optional for small or non-complex credit unions without complicating assessments of risk?

If a credit union is small and non-complex, some sections for more complicated credit unions would probably not be applicable anyway.

3. What specific items would you like to see added to the Call Report/Profile to enhance analysis of local, regional and national performance trends or improve comparisons of individual credit unions with peer institutions?

Business lending is a large enough portfolio for many credit unions that it should be a collateral type included in page 7 delinquency and page 9 charge offs and recoveries. It is included in all other loans which makes it difficult to understand how much business loans impacts the totals. Business loans are included in the additional loan information on page 8 and further down on page 9, but it should be segregated as a major category in the primary calculations.

4. Are current Call Report account categories (database fields) reasonably aligned with your internal accounting? If not, what changes would improve the alignment?

We do not break down business loans to account for the exclusions required on page 15 in our internal accounting. This page is particularly time consuming to complete because of that.

5. Are the Call Report and Profile instructions adequate? If not, what improvements (overall and peculiar to specific items/schedules) would improve clarity and reduce reporting burden?

In general, there should be several more examples or specifics added to the instructions. Instead of just referencing an NCUA rule number, provide the instructions as well to avoid confusion in interpreting the legal rules.

1. For the unfunded commitments, the instructions should clearly state whether or not to include loans approved, but not yet funded.
2. For P6 the employee number, the instructions should specify if the employees such as interns or temporary employees from the hiring agency should be counted.
3. For P4 the uninsured shares, there should be update to include the recent change to include the IOLA and the custodial or other fiduciary capacity account. The instructions refer to part 745 of the NCUA rules, but further explanation in the instructions would be helpful.
4. There should be updates periodically based on technology trends. For example, in miscellaneous information, include mobile devices in #7.
5. In schedule A the difference between hybrid/balloon and ARM should be more clear.

6. Could re-organization of the Call Report or Profile reduce reporting burden? If so, please describe the needed changes. Does the Call Report contain elements that should be moved to the Profile? If so, please detail these elements. Does the Profile contain element that should be moved to the Call Report? If so, please detail these elements.

7. Do you have any concerns or ideas about NCUA schedules/forms for collecting financial and non-financial information not addressed above? Extend due date for the December 31 call report to allow more time. Since this is likely the majority of credit unions' year end, the closing takes longer.

MYC FCU