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Cc: [Executive Team; "kbutler@ccua.org"](#)
Subject: Robert A. Fleury, Granite State Credit Union —Call Report/Profile Content Modernization
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Mark Vaughan
National Credit Union Administration
Office of Examination and Insurance
1775 Duke Street, Alexandria, VA 22314

Re: Comments on Call Report/Profile Content Modernization

Dear NCUA Board,

I am writing to comment on Call Report/Profile Content Modernization. I am the Executive Vice President/CFO at Granite State Credit Union (GSCU), headquartered in Manchester NH. We have approximately 33,000 members, with \$358,000,000 in assets and 7 branches. Prior to 2012, I had the pleasure of working for the NH State Banking Department in a variety of positions for over 21 years.

First, thank you for the opportunity to provide comments on a much needed change within the credit union community. While our answers to the questions are not expansive, we would like to incorporate these in with the examination flexibility initiative comments as we feel they are significantly related.

What specific areas of the Call Report and Credit Union Profile do users find challenging?

The business portion is time consuming due to definition discrepancies within our systems and the call report. Specifically for GSCU, we find that page 15 has MBL data and loans for Risk Based Net Worth that is quite involved. Another is page 13 that requires splitting mortgages >15 year and <15 years which requires time consuming manual processing.

What sections or items could be made optional for small or non-complex credit unions without compromising the agency's ability to assess risk in these institutions?

The NCUA should determine the level of data needed from these credit unions and exempt unnecessary schedules.

What items could be added to the reports to enhance the agency's analysis of the system's performance trends;

Balance Sheet schedules could be added or expanded to breakdown loan categories. Some examples would be 1st mortgages could have subcategories for MBL and Residential. Also, consumer loans could be broken down into various subcategories.

The same breakdown would be useful in the income/expense schedules.

Adding a section that reconciles changes in the allowance since the prior year-end would be useful to better understand the allowance function in each credit union.

What areas of regulatory reporting align with a credit union's internal accounting and what areas do not;

Some aspects of the MBL's and mortgages do not align, which requires a manual process. Such as splitting mortgages >15 year and <15 years.

How the Call Report and Credit Union Profile could be reorganized to reduce credit unions' reporting burden?

GSCU has developed templates to improve our efficiencies in completing the profile. However, it remains a burden do to the quarterly filing requirements given the lack of change from quarter to quarter. In addition, there are a number of redundancies between the profile and the call report. Certain fields within the profile could be transferred to the call report in the event the NCUA needed this information to improve the offsite monitoring program.

What additional suggestions or ideas do credit unions have for collecting financial and non-financial information?

GSCU supports a risk focused examination program that is based on the results of an individual credit union's risk assessment. Key to the program is accurate, meaningful data from the quarterly call reports.

Expansion and modification of some schedules is needed to ensure the NCUA can obtain and review data to better understand a credit unions performance as well as the industry as a whole. This will require the NCUA to define both financial and non-financial data that will be needed to complete this goal and implement a data collection program that is the least burdensome on the credit unions.

Thank you for the opportunity to comment on this.

Robert Fleury

Executive Vice President/Chief Financial Officer

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