



**State of Wisconsin**  
*Department of Financial Institutions*

Scott Walker, Governor

Lon E. Roberts, Secretary

August 1, 2016

Mark Vaughan  
National Credit Union Administration  
Office of Examination and Insurance  
1775 Duke Street  
Alexandria, VA 22314

***RE: MODERNIZING DATA COLLECTION COMMENTS***

Thank you for the opportunity to comment on the National Credit Union Administration (NCUA) initiative to conduct a comprehensive review of the 5300 Call Report and Form 4501A Profile. The State of Wisconsin currently regulates 144 state-chartered credit unions. We have exam procedures to ensure the call reports and profiles are filled out timely and accurately as we use the data extensively for analysis, supervision and oversight. I appreciate that NCUA is seeking to improve these important documents.

At this time, I have these comments:

- Expand the collection of data related to branch offices of a credit union. For example, add a requirement to have credit unions disclose loan and deposit information for each branch office. This would be consistent with FDIC collection of branch data.
- Improve the instructions for reporting investments and/or assets related to employee benefits.
- Make the call report and profile data more accessible to the regulator. Right now, I download the files off CU Online in an .XML format and import them to Microsoft Access. The process of creating a usable database is time consuming and laborious. Is it possible to download or get the data in a more usable format such as Microsoft Excel?
- As more credit unions do business lending, it would be useful to include member business loans as part of the loan schedule, page 2. Obviously, the loan amount would tie out to the more detailed schedule on business loans.
- Improve collection of data related to potential liabilities and off balance sheet exposures that the credit union may have for post-retirement benefit packages, management contracts, golden

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parachutes, lawsuits, other contracts with a third party, etc. Credit unions should have to disclose items that may materially affect their financial statements.

- Amend page 10 to include data collection for when a credit union has an ongoing agreement or commitment with a third party to purchase loans. As an example, we have a credit union that has entered into an indirect lending relationship with a company. They have committed to purchasing a specific amount of loans from this company on a monthly basis. That commitment should be disclosed and I don't believe it is because it is an ongoing arrangement versus a one-time sale.

Thank you for the opportunity to comment. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Kim Santos". The signature is written in a cursive, slightly slanted style.

Kim Santos  
Director  
Office of Credit Unions

