Chapter 8

GENERAL LEDGER

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Examination Objectives

- Evaluate adequacy of policies, practices, procedures, and internal controls regarding financial transactions
- Determine that personnel operate in conformance with established guidelines
- Determine that the credit union properly recognizes and promptly records assets and liabilities
- Review compliance with the *FCU Act*, *NCUA Rules and Regulations*, and appropriate accounting practices
- Determine accuracy of the Financial and Statistical Reports (NCUA 5300)
- Assess promptness of corrective action initiated by management when deficiencies or violations in policies, practices, procedures, or internal controls regarding financial transactions arise

Associated Risks

- Strategic risk. The timely, accurate and consistent recording of financial transactions affects management's development and monitoring of the strategic plan. Deficiencies in financial statement presentation may lead to ineffective evaluation of new products and services, and failure to attain financial objectives.

- Transaction risk. Policies and procedures established by the board and implemented by management should ensure the accuracy and integrity of data and information. In conjunction with the review of internal controls, examiners should consider the following items when evaluating this type of risk:

  - The recording of financial transactions in accordance with appropriate accounting methods;
  - The volume and complexity of financial transactions; and
  - The expertise and willingness of management to implement corrections for improving financial reporting.

- Compliance risk. Credit unions must comply with applicable laws and regulations, including:

- The *FCU Act*;
- *NCUA Rules and Regulations*; and
- Regulatory accounting procedures, accounting bulletins, etc.

Additionally, they should be guided by

- The *Accounting Manual for Federal Credit Unions* (for credit unions that are less complex); and/or
- Generally accepted accounting principles (GAAP.)

- Reputation risk. Examiners should consider reputation risk when developing the Scope Workbook. When evaluating reputation risk, they should assess whether the credit union:

  - Provides current and accurate financial statements and NCUA 5300 reports;
  - Implements new accounting procedures and requirements within acceptable time frames;
  - Responds promptly to recordkeeping problems;
  - Provides accurate and timely member statements;
  - Responds promptly to members' concerns; and
  - Performs a thorough analysis of operational needs, staffing, risk management systems, compliance issues, and long-term benefits, prior to implementing new products and services.

Overview

Examiners should use their professional judgment to tailor the general ledger review to the complexity of the credit union operation and the risks present in and around this operation. The review of a credit union's general ledger and its related subsidiary ledgers should give the examiner a clear impression of the credit union's financial position and its relative financial stability.

During the scope development process, examiners should review the supervisory committee audit report and, if necessary, the workpapers. Reviewing the prior examination report will assist in determining the scope of the general ledger review. The scope of the general ledger review will vary depending upon the following:

- Reliability of the audit;
- Concerns noted in previous examination or audit reports;
- Interviews with management and staff;
- Extent and quality of management's due diligence regarding the credit union's products, services, and systems;
- Review of internal audit work, if applicable; and
- Review of the internal controls of the credit union.

§741.6(b) of *NCUA Rules and Regulations* requires credit unions with assets of $10 million or more to present their NCUA 5300 in accordance with GAAP. Credit unions with less than $10 million in assets may present their financial statements using regulatory accounting principles as set forth in the *Accounting Manual for Federal Credit Unions*.

Expanded Review Procedures

The depth of review necessary for each general ledger account will vary within a credit union and from one credit union to another. The most critical element for determining the degree of variance and the necessary depth of review is the examiner's professional judgment, experience, and risk perception. Examiners can implement the following additional procedures when warranted:

- Determine that the general ledger account balances with each respective subsidiary ledger total;
- Review the debits and credits and analyze any unusual activity; and
- Determine the propriety of the entries.

One effective method of reviewing or reconciling general ledger accounts is to trace entries to source documents or actual receipts. Except in unusual circumstances, the examiner should not audit or verify individual entries in either subsidiary ledgers or control accounts. If material inaccuracies exist in the general ledger accounts, examiners may support their analyses either by footnoting the credit union's financial statements or using the Statement of Financial Condition and Statement of Income. To avoid distortion of examination trends and ratios, the examiner prepares adjusting entries in the General Ledger Journal Adjustments when a material out-of-balance condition exists between a subsidiary ledger and its general ledger control account.

Red Flags

Some of the red flags in the accounting area that may require examiners to consider expanding their procedures include the following:

- Ongoing recordkeeping problems;
- Cash and bank reconciliations not complete, in arrears, or with (fluctuating) out of balance amounts;
- Excessive teller overages or shortages, either in number or amount;
- IOU's in teller or vault cash;
- Numerous erasures, corrections, whiteouts, line-outs;
- Numerous voided or third party checks;
- Numerous stale-dated outstanding checks;
- Numerous stale-dated reconciling items;
- Lump sum postings not conducive to good audit trail;
- Checks or transactions receipts missing or out of sequence;
- Timeliness of deposits not in accordance with Bylaw requirements, if adopted by the credit union;
- Bank account activity and/or bank account balances (or share draft clearings/total share draft balances) exceeding realistic needs;
- Excessive number of depository accounts providing potential for kiting; and
- Excessive cash/assets ratio (indicating poor cash management or possibly fraud.)

Out-of-Balance Conditions

The examiner normally does not attempt to balance or audit subsidiary ledgers to the control accounts. The examiner should discuss the concern with management and obtain agreement for corrective action. (When examiners suspect fraud or embezzlement, they should immediately contact their supervisory examiners for further guidance.)

Materiality

The credit union's size and its ability to absorb potential losses may significantly affect what examiners consider material. In assessing the materiality of a general ledger account, the examiner considers its effect on the credit union's profitability and net worth. In some instances, the account may have minimal effect on the balance sheet, while it may have a material effect on the income statement. For example, overstating accrued income may have little or no effect on the balance sheet but could mean the difference between a negative and positive bottom line on the income statement.

Unusual Activity

Unusual activities include those the examiner deems improper or uncommon, or which might adversely affect the credit union. This review should consider the size and frequency of the transactions. These accounts may have numerous entries during an accounting period, but clear out by the end of the period (e.g., ATM, credit cards, travelers' checks, money orders, and share draft clearing accounts.) The examiner may review this activity on a test basis to ensure the appropriateness of the entries (this may include a sample review of source documents or receipts.) The review should also satisfy the examiner that the account entries do not temporarily camouflage other activities.

Examination Period Activity

Examiners should concentrate the scope of the general ledger review primarily on activity during the examination period. For example, if the credit union purchased its building in a prior examination period, and if examiners reviewed the account during the last examination, current examiners need not perform another complete analysis. Instead, they may determine the credit union's current fixed asset position and the ability of the earning assets to support the non-earning assets.

NCUA 5300

The examiner will review the accuracy of the Financial and Statistical Reports (NCUA 5300 Call Report) submitted since the last examination and the credit union's process for ensuring accuracy of the 5300s. The review of 5300s often takes place during supervision. If examiners discover material errors or omissions, they should inform the officials, provide appropriate instructions to ensure proper completion in the future, and make corrections according to regional policy.

Accounts Receivable

Accounts Receivable generally represent funds due the credit union from persons other than members. Receivables may include payroll deductions, insurance premiums, taxes, etc. If a credit union has material accounts receivable, the examiner may determine that (1) the receivables exist, (2) the credit union receives payments on schedule, and (3) staff reconciles the subsidiary ledgers. Staff should promptly follow up on receivables that do not clear. Receivables that do not eventually clear will ultimately result in charges to an expense account and could affect the financial stability of the credit union.

CLF Stock/ NCUSIF Deposit

When a credit union is a direct member of the Central Liquidity Facility (CLF), the examiner may review the CLF stock subscription computation. If either an overpayment or an underpayment exists, the examiner should require the credit union to notify the CLF.

When reviewing the Share Insurance Capitalization Deposit, the examiner should compare and reconcile the credit union's recorded deposit to that reported by the periodic statements from the share insurance fund. Examiners should also review for accuracy uninsured shares reported on the 5300 Call Report as of December 31, since they affect the capitalization deposit.

Prepaid and Deferred Expenses

Prepaid and Deferred Expenses represent expenses that the credit union has paid for, and supplies or services that have remaining value to the credit union (i.e., not fully used up.) Common examples include office supplies, prepaid fidelity/bond insurance, and prepaid league dues. The credit union often pays for these items annually so that at any point before year-end, some value remains (i.e., an item paid on January 1 for the full year would have six months' value (and expense) remaining in June.) These prepaid expenses must have a future value for a coming period, and not cover a prior period. Unless materiality factors exist, the examiner usually limits the review to the reasonableness of the entries in these accounts.

Fixed Assets

The credit union may either own or lease (under a capital lease) its fixed assets. Fixed Assets include three major, and often material, categories:

- Land and buildings;
- Furniture and equipment; and
- Leasehold improvements.

Before making a major investment in fixed assets, the board of directors should instruct management to perform due diligence, including carefully analyzing the need for the asset, and its expected effect on the credit union's future earnings ability from the standpoint of both the additional depreciation expense and the lost opportunity costs of the income. (Credit unions may better serve their members by providing faster and more convenient services using advanced computer technology such as home banking than by brick and mortar expansion.) Income from the earning assets (loans and investments) should support the investment in fixed assets.

Management should also consider the credit union's reserve position and ratio of "non-cost" capital (the income retained by the credit union as Undivided Earnings or reserves, for which the credit union pays neither interest nor dividends) to non-earning assets. A relatively high capital level reduces the burden on earning assets.

The credit union may employ various capital budgeting techniques to determine the payback method, the accounting rate of return, or the internal rate of return.

Investments in fixed assets require board approval. Management should purchase fixed assets in compliance with established board policy. Credit unions should record the purchase price and set up depreciation schedules in accordance with acceptable accounting practices.

The examiner may determine that the credit union complies with §701.36 of the *NCUA Rules and Regulations* regarding the purchase of fixed assets. Credit unions eligible for Part 742, Regulatory Flexibility Program, may be exempt from §701.36(a), §701.36(b), and §701.36(c.) When reviewing the regulation, the examiner should understand that while GAAP affords capital leases and operating leases different accounting treatments, the regulation requires inclusion of both operating and capital leases in the definition of "investment in fixed assets."

Capital Leases

From the standpoint of the lessee, two major categories of leases exist: capital and operating. Generally, a capital lease transfers substantially all of the benefits and risks of ownership of the asset, while operating leases more closely resemble rental payments.

Real Estate Sales

Transactions involving the sale of credit union-owned property often have complicated accounting treatments with various profit recognition and disclosure requirements. An examiner encountering sales of credit union owned real estate should determine the facts and circumstances of the sale and, if necessary, discuss the situation with the supervisory examiner.

Accrual Income

Accrued Income is income the credit union has earned but has not yet received. Common examples include accrued interest on loans and accrued income on investments. Loans and many investments earn income from the day the credit union establishes the asset. The credit union may not receive income from these assets for a month (with loans) or longer (with investments.)

When a credit union adopts accrual accounting between examinations, the examiner should determine that the accounts were properly established. Examiners may verify the accruals for accuracy. Depending on the complexity of the credit union's operations, the examiner should review and analyze the schedules used in calculating the accrued income on loans or investments.

If the information system (IS) generates estimated accruals, the examiner may verify their accuracy through sampling. For example, some automated accounting systems can generate a detailed list by account number for the accrued income on loans. The examiner should also determine that the credit union does not accrue interest on loans 90 days or more delinquent.

If the examiner's estimate differs substantially from the recorded accrual, the examiner should expand the analysis to determine proper formulation of, and adherence to, policies and practices for accrual of interest on delinquent loans. The examiner should also review how the credit union arrived at its figures. When assessing the materiality of inaccuracies identified in the accruals, examiners should consider the effect on reported income. Either an under- or over-statement in the estimated accrual can materially affect profitability.

Other Assets

Other Assets can include deposits with public utilities, insufficient funds checks, the premium stabilization deposit, monetary control reserve deposits, escrow accounts on serviced real estate loans, and assets acquired in liquidation. In general, the examiner may determine the reasonableness of the balances and dates recorded. The credit union should charge off the portion of an account representing a nonrefundable or nonrecoverable amount.

The examiner may verify that the credit union books the value of assets acquired in liquidation in accordance with acceptable accounting practices.

Accounts Payable

Accounts Payable represent obligations of the credit union including payroll deductions that the credit union has not yet distributed to share accounts, remittances due for travelers' checks, insurance premiums due, etc. The examiner may (1) determine the date of origin, and (2) review material amounts to ensure the credit union reconciles subsidiary ledgers with control accounts and makes payments when due.

Notes Payable

Notes Payable are borrowings by the credit union, typically through the corporate credit union network or other financial institutions. Credit unions may borrow from any source in an aggregate up to 50 percent of its paid-in and unimpaired capital and surplus. The board is responsible for developing a use and repayment plan for borrowed funds.

Dividends Payable

Credit unions use this account only at the end of dividend periods to reflect the actual or estimated amount of dividends due and payable to the members. Dividends Payable, while set up at the end of each dividend period, should normally clear out shortly afterwards. If a balance remains in the account as of the examination date, the examiner should explore the reasons and may determine that the amount ties to a dividend payable report or represents a reasonable estimation.

Interest Refunds Payable

Some credit unions use *interest refunds* as a method of returning part of the credit union's profits to the members. Members, who have paid interest on loans during the period, receive back a portion of the interest they have paid.

Taxes Payable

Taxes Payable depict accounts payable to governments, usually including Social Security, federal, and state withholding taxes. These accounts will normally clear out monthly or quarterly. If not, the examiner may determine whether the credit union uses proper accounting for these accounts. Although the amounts payable in taxes usually are immaterial, credit unions can incur substantial fines and penalties for nonpayment. Since NCUA does not enforce Internal Revenue Service or state tax regulations, examiners should direct their concern toward the credit union's prevention of tax problems.

Accrued Expenses

Accrued Expenses represent expenses that the credit union has incurred and which it owes in the current period but will pay in a future period. These may include compensation, employee benefits (e.g., vacation and sick leave pay), and office operations. An accrued expense is an expense for the current or prior period. Credit unions may not prepay them. As is true of accruing income, accruing expenses more accurately presents the credit union's financial position.

Accrued expenses include accrued dividends payable. Credit unions that accrue dividend expenses more frequently than the actual dividend period should record the liability in Accrued Dividends Payable. Even credit unions that use the modified cash basis of accounting must accrue dividends contracted for or specified in advance, such as share certificates, to comply with the full and fair disclosure requirements of §702.402 of the Rules and Regulations. The examiner may determine the reasonableness of the recorded dividend accrual on share accounts where the credit union specifies or contracts for the dividend rate in advance.

Other Liabilities

Other Liabilities include liabilities under pension plans, collections on loans and other obligations serviced, obligations under capital leases, monetary control pass-through deposits, and undisbursed loan proceeds. Material balances should reconcile to the appropriate subsidiary ledgers or external statements.

Unapplied Data Processing Exceptions

The Unapplied Data Processing Exceptions account allows the credit union to reconcile the general ledger control accounts with the individual share and loan ledgers when the IS rejects entries in the latter. For example, if staff posted a share withdrawal to both the journal and cash record and to the individual share ledger but keyed in an incorrect account number, the share ledger will exceed the journal and cash record by the amount of the rejected withdrawal. If the credit union closes its books before making the correction, the general ledger will not balance with the individual share ledger. Correcting the exception requires debiting a general ledger suspense account, Unapplied Data Processing Exceptions, and crediting the general ledger shares account, thus balancing shares to the share ledger. The credit union will debit shares and credit the suspense account to correct the entry.

Complicated transactions can occur in this account when compounded by payroll deduction errors, input errors on refinanced loans with temporary disability insurance, corrections to prior period's dividends, etc.

An unreconciled suspense account can contribute to a severe record keeping problem with the potential for material adjustments and losses. Depending on materiality, the examiner may (1) determine that the balances reconcile to an appropriate subsidiary ledger, (2) ensure that reconciling items clear out on a timely basis, and (3) review frequent or consistent transactions through these accounts for appropriateness. Whether or not the suspense account has a balance as of the examination date, the examiner may review the activity in the account since the last examination.

Deferred Credits

Deferred Credits represent income received but not earned. Deferred Credits includes fees the credit union charges a member for entering into an agreement to make a loan and direct loan origination costs. If the member exercises the commitment, the credit union transfers the net balance to the appropriate loan contra account for net commitment fees. The credit union may choose whether to follow GAAP or to amortize the fees over the life of the loan or ten years, whichever is shorter, as an adjustment of yield using the interest method. Credit unions on a modified cash basis, or if the amount is immaterial, should amortize the net fees over the shorter of the life of the loan or ten years, as an adjustment of yield using the interest method.

Contingent Liabilities

Examiners should discuss with management and, if necessary, fully analyze contingent (unrecorded) liabilities, or "off-balance sheet" items, to determine the financial effect on the credit union. Examples include long-term management contracts with employees, long-term contracts with information processing suppliers, long-term leases for fixed assets, claims that significantly exceed premiums on a select risk-rating insurance plan, employee pension plans, accrued sick leave and vacation, unused lines-of-credits and credit cards, unfunded construction loan commitments, and pending legal suits.

The reviews of board minutes and audit reports often provide clues to the existence of contingent liabilities. Asking questions of management about the degree of credit union involvement in these activities along with reviewing significant contracts, insurance policies, and pension plan information aid examiners in analyzing this area.

When examiners note significant contingent liabilities, they should determine that the credit union meets full and fair disclosure requirements. They can determine full and fair disclosure in several ways, such as the establishment of proper accrual accounts or footnotes to the financial statements. If the credit union's financial and statistical reports do not show material contingent liabilities as footnotes, examiners should reach agreements that management will provide the footnotes on future reports.

Individual Share and Loan Ledgers

Credit unions use many different accounting systems to track individual share and loan accounts: hand posted ledger books, ledger cards, in-house computers of various capacities, and outside service bureaus. Each system differs somewhat from the others. The examiner should take the time to become familiar with each system and understand what the data represents. Although the systems have differences, they share the common purpose of maintaining the subsidiary ledgers to general ledger control accounts.

Small credit unions often have two subsidiary ledgers, the individual share and loan ledgers, and two control accounts, the general ledger share and loan accounts. Larger or more sophisticated credit unions may have many subsidiaries for both shares and loans, including separate ledgers for real estate loans, student loans, consumer loans, regular shares, share drafts, etc. In all cases, subsidiary ledgers must balance with the control account and the total of subsidiary ledgers for both shares and loans with their respective general ledger accounts.

Ledgers Out Of Balance

If the trial balance totals of the individual share and loan ledgers do not agree with their respective control accounts in the general ledger, or if one or more subsidiary ledgers do not agree with their respective control accounts, the out-of-balance condition could represent varying degrees of seriousness. These could vary from an innocent error in extension of balances to an embezzlement of sizeable proportions. The examiner should verify the reason for material out-of-balance conditions. The examiner may guide the officials in resolving the situation.

Regardless of the mechanics required to correct the out-of-balance condition, the examiner should make it clear to both the treasurer and the board that the treasurer has responsibility for keeping accurate books and records current and in balance. Responsibility for locating and correcting existing errors, determining the reasons for the errors, correcting the causes, and preventing a recurrence ultimately falls to the board.

The examiner should not attempt to balance the records or spend considerable time searching for errors after pinpointing the type of error that occurred, unless evidence of dishonesty exists. If dishonesty exists, the examiner should consult with the supervisory examiner before proceeding with additional test checks. The examiner should develop specific plans of action with the officials to find errors, balance the ledgers, and eliminate the causes.

Credit unions must resolve out-of-balance conditions. However, a difference, which could affect the financial condition of the credit union, requires more immediate correction than does a difference of a few dollars made in a recent dividend calculation.

Even though a substantial difference may exist, a stable difference presents a lesser problem than a difference that fluctuates from period to period. A stable difference usually occurs in an identifiable, specific period and does not usually represent a continuing problem with internal controls and record keeping. It may represent a one time occurrence.

Arbitrary Adjustments

When any of the credit union's records (General Ledger, Journal and Cash Record, Individual Share and Loan Ledgers, or material subsidiary ledgers) are in arrears and staff cannot bring them current during the examination, the examiner should consider delaying the completion of the examination until staff brings the records current. This should also hold true if the general ledger is out of balance. When examiners delay the examination, they should reach agreements with the officials to correct the problem. Examiners should discuss any delays in the examination with the supervisory examiner for concurrence with plans before reaching agreements with officials.

If, upon returning to the credit union, examiners find that the officials have failed to follow through on agreements reached, they should complete the examination using the most current meaningful data available. As appropriate, they will discuss the situation with the supervisory examiner and come to an agreement on how best to handle the situation, in accordance with regional policy.

Serious and persistent record keeping deficiencies may warrant administrative action. Persistent record keeping deficiencies may constitute serious recordkeeping problems that continue to exist past a usual and normal period of time. NCUA considers persistent recordkeeping deficiencies serious if a reasonable doubt exists (1) that the credit union's financial statements accurately and fairly present the financial condition of the credit union, or (2) that management practices and procedures sufficiently safeguard the members' assets. In addition to administrative actions, NCUA can require the credit union to obtain an outside, independent audit by a certified public accountant. (See §715 of the *NCUA Rules and Regulations* and the Supervisory Committee section of this Guide.)

When the credit union cannot determine available earnings because it has not prepared an accurate financial statement, it may not declare dividends until the board of directors can determine if the credit union can pay a legal dividend.

If examiners do not consider differences material and the differences have not fluctuated during the previous three months, the examiner may ask the directors and the supervisory committee to authorize an arbitrary adjustment for the difference.

Pension Plans

The examiner's objective in reviewing pension plans should determine the following:

- Subsidiary records exist to document the existence of the pension plan;
- Proper methods account for the plan;
- The financial statements contain the appropriate pension plan disclosures; and
- The board of directors has recognized and approved the plan.

A pension plan is a contract between a credit union and its employees whereby the credit union agrees to pay benefits to employees upon their retirement. Pension benefits generally consist of monthly payments and may provide for additional payments when employees die or become disabled.

A pension plan may be formal or implied by credit union practice. A credit union, individually or collectively with other credit unions, may establish a plan. Due to their complexity, credit unions should only undertake participation in any pension plan with the advice of legal counsel. If the pension plan involves the placement of pension funds in trust or custodial accounts in the credit union, the credit union must comply with the applicable *Federal Credit Union Bylaws* (if the credit union has so adopted), and Part 724 of the *NCUA Rules and Regulations*. A substantial difference can exist in a credit union's obligation between a defined benefit plan and a defined contribution plan. Additionally, credit unions should ensure and document compliance with IRS regulations, Pension Benefit Guaranty Corporation guidelines, and Department of Labor requirements.

Pension plans may be either funded or unfunded. Under a funded plan, the credit union makes regular periodic payments to an insurance company or trustee, which agrees to assume the responsibility of distributing retirement checks to recipients. In an unfunded plan, the credit union makes periodic payments directly to its retired workers. The plan may be contributory, where the employees bear part of the cost, or it may be noncontributory, where the credit union pays the entire cost.

Accounting for Pension Cost

When a credit union adopts a pension plan, actuarial tables determine the past service cost and the normal cost. Once the credit union ascertains the costs, it establishes a funding policy. Credit unions usually fund normal costs and expense those costs the same year they occur. The funding policy for past service costs also affects the amount of recorded expenses for any period. However, no requirement exists that the amount of pension expense related to service costs must equal the cash put into the fund to finance those costs during any one period. A particular credit union's funding and expense policies will result in one of the following:

- The amount of recorded pension expense equals the cash paid into the fund. This situation can only arise when the amortization period equals the funding period for past service costs. In this example, no requirement exists to establish an account in the general ledger for any over- or under-accrual of the liability for pension costs.

- The amount of recorded pension expense exceeds the amount paid into the fund, creating a pension liability. This arises when the funding period for past (and changes in prior) service costs extends longer than the expense amortization period.

- The amount of recorded pension expense is less than the amount paid into the fund, creating a pension asset. This arises when the funding period for past (and changes in prior) service costs is shorter than the expense amortization period.

Due to the complex nature of accounting for pension plans, the credit union should obtain competent outside assistance, if needed, to fully comply with GAAP and disclosure requirements. As credit unions grow larger and employ more staff, credit union pension plans increase in importance within the expense structure of a credit union. Proper accounting and the need for full and fair disclosure become increasingly necessary.

Workpapers and References

- Workpapers
  - Statement of Financial Condition
  - Statement of Income
  - Journal Entries Summary
  - Financial History
- References
  - *NCUA Rules and Regulations*
    - 701.36 – FCU Ownership of Fixed Assets
    - 702.402 - Full and Fair Disclosure
    - 715 – Supervisory Committee
    - 724 – Trustees and Custodians of Pension Plans
    - 725 – Central Liquidity Facility
    - 741.6 – Financial and Statistical and Other Reports
  - *Accounting Manual for Federal Credit Unions*
  - *Federal Credit Union Bylaws*
  - *Federal Credit Union Act*