



March 29, 2018

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

RE: Modernizing Data Collection for Supervision of Credit Unions

Dear Ms. Thor:

On behalf of Randolph-Brooks Federal Credit Union ("RBFCU"), this letter is being submitted in response to the National Credit Union Administration's ("NCUA") Request for Information ("RFI") on "Modernizing Data Collection for Supervision of Credit Unions." We greatly appreciate the opportunity to comment.

#### Introduction

NCUA uses the Call Report and Profile to collect financial and nonfinancial information from federally insured credit unions. The proposed changes to the Call Report and Profile are part of the agency's modernization efforts, which are an attempt to reduce the reporting burden on credit unions, improve offsite supervision, and update the organization of the forms and related instructions. NCUA is proposing to eliminate nearly 40 percent of the Call Report fields, and nearly 20 percent of the Profile fields.

#### Derivatives and TDR Loans

RBFCU appreciates NCUA's attempt to reduce the reporting burden on credit unions. As part of this process, NCUA proposed removing obsolete account codes and consolidating data fields where possible. RBFCU specifically appreciates NCUA simplifying the five page derivative reporting requirement to a single page requirement in the proposed Call Report. Additionally, RBFCU appreciates the removal of the section on troubled debt restructured (TDR) loans based on the new CECL accounting standard which modified the treatment of distressed loans. RBFCU believes these adjustments are beneficial to the reporting process.

#### Reporting Burden on Credit Unions

While RBFCU appreciates NCUA's attempt to streamline the reporting process, we believe the proposed modifications as a whole significantly increase the reporting burden on credit unions. To be compliant with the proposal, credit unions will necessarily be required to modify their internal, automated processes, adjust business procedures, and request new information from third party vendors. This will result in additional billings from third parties and will create a monetary and administrative burden on

Austin | San Antonio | Toll-free  
512-833-3300 | 210-945-3300 | 1-800-580-3300

[rbfcu.org](http://rbfcu.org)

P.O. Box 2097, Universal City, Texas 78148-2097



the credit union. As such, the restructuring process that is ascertained by the proposal will carry transitional difficulties and be arduous on the credit union to implement.

While RBFCU believes the new data fields being requested by NCUA will add significant regulatory burden on the credit union as discussed above, we also do not see the additional benefit that NCUA will gain through the collection of this information. The current data requested by NCUA is sufficient to thoroughly conduct a comprehensive examination of a credit union, and therefore, it is unnecessary to create such a significant burden without proper justification. For this reason, RBFCU seeks additional clarity on the purpose behind each new additional data field and respectfully requests NCUA to explain what they will achieve through the collection of this information and how they plan to use the data to achieve their suggested goals.

Profile Changes

The online Credit Union Profile section collects specific operational information that is occasionally amended, such as disaster recovery information, emergency contact information, and information on systems and technology. On a quarterly basis, a credit union reviews, updates, and certifies its Profile information.

Because the current Profile contains information that is only occasionally amended, credit unions do not have a difficult time maintaining the Profile. However, the proposed Profile adds fields which are currently in the Call Report and includes data which regularly changes. If these fields are moved to the Profile, it will be cumbersome on credit unions to modify their Profile on such a frequent basis. As such, we believe these fields should remain in the Call Report.

Conclusion

RBFCU appreciates NCUA's attempt to reduce the reporting burden on credit unions. However, we believe the additional data required by NCUA and the changes proposed in the Profile will be challenging on the credit union to implement. As such, we respectfully request NCUA to reconsider their proposal and to provide detailed justification for the new account codes. We thank you once again for the opportunity to comment.

Sincerely,

Randy Carswell  
Senior Vice President, Finance  
Randolph-Brooks Federal Credit Union