



March 29, 2018

Mary Thor  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428  
Via email to: [CallReportMod@ncua.gov](mailto:CallReportMod@ncua.gov)

Re: Call Report/Profile Content Modernization

Dear Ms. Thor:

Cornerstone Credit Union League (Cornerstone) appreciates the opportunity to submit comments concerning the National Credit Union Administration's (NCUA) request for information on Modernizing Data Collection for Supervision of Credit Unions. Cornerstone represents over 500 federally and state chartered credit unions in Texas, Oklahoma, and Arkansas, which in turn serve over 8.1 million members.

Cornerstone thanks NCUA for making efforts to reduce the regulatory burden on the credit union industry. We support removing impertinent account codes and relocating account codes to be logically grouped together.

Cornerstone suggests at least a one-year timeline to permit credit unions to work with third party core processors who will need to implement system improvements. We also request that NCUA grant permission for credit unions to use the new call report prior to the deadline, if they so choose. In addition, we request an additional two quarters beyond the target date, whereby late filings or non-material reporting errors would not be subject to penalty, particularly for smaller credit unions who have even less bargaining power to negotiate with third parties regarding timelines.

Cornerstone supports efforts to provide greater clarity to the call report instructions. We suggest adding a "help" box to the form, akin to what is included on the examiner questionnaires. This addition could save valued time for the person executing the form by eliminating the step to track down assistance tools elsewhere prior to proceeding.

Given the modernization efforts of the quarterly call reports as well as the Automated Integrated Regulatory Examination System (AIRES) system are concurrent initiatives, many credit unions do not at this time believe that the overall effect will be a reduction in reporting burden. While credit unions envision at least one-year implementation timeline would be required to comply with the call report modernization requirements, there is also recognition that compliance with the anticipated AIRES data request changes would likely require a minimum of three years for processors to develop the tools, have them adequately tested

internally and externally, and fully implemented, subject to examination. Credit unions have also reported that it would be helpful to them if the agency would conduct training sessions, including as relates to CECL compliance requirements, in advance of the January 2019 implementation timeframe.

We support the proposed section covering Credit Union Programs and Member Services where an institution can report availability of financial literacy and well-being programs, including those for financial counseling, education, first-time homebuyers, and credit management/repair.

Thank you for the opportunity to provide comments on the involuntary liquidation and claims procedures proposal. Should you have any questions about Cornerstone's comments, please feel free to contact me at (512) 853-8516.

Sincerely,



Suzanne Yashewski

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Cornerstone Credit Union League

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