

**From:** [Beverley Rutherford](#)  
**To:** [Call Report Modernization](#)  
**Subject:** VACU - Call Report/Profile Content Modernization  
**Date:** Monday, August 15, 2016 11:32:28 AM  
**Attachments:** [image003.png](#)

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Thank you for the opportunity to provide our comments to your request for information about modernizing the collecting, storing, and analyzing of regulatory data. I am responding on behalf of a state-chartered credit union with over 3 billion in assets.

You had provided questions you were interested in receiving information and comments. Our comments are indicated below:

1. You had asked about specific areas of the Call Report/Profile forms we found challenging to complete. The most time consuming, manual section of the Call Report is the Business Lending section. This section is complicated by the rules that determine a business loan. The arbitrary \$50,000 amount that determines whether a loan is reported in the top section but is applied differently in the RBNW section causes us to have to manually review loans to determine how/where to report. Other items that increase the complexity and time to prepare this schedule include: 1) including unused credit lines in balances and in loans granted year-to-date; 2) including individual members' investment properties that generally follow a consumer mortgage lending process (these are not traditional developers/real estate investors); 3) the many line items describing collateral could be reduced (perhaps real estate versus business assets versus unsecured) with further detail only necessary if a portfolio was of a certain size or concentration; and 4) loans reported on the business loan schedule as real estate should not have to be reported in the Real Estate Section as well. It would be easier if these two sections were split between consumer and business. If the business section would need more detail on types of loans, then that should be added there.
2. You had requested comment on what specific items we would like to see added. We would like to see information on mergers added to the profile to help determine how much growth was due to a merger when researching other credit union trends.
3. You had asked for input on whether current Call Report account categories were reasonably aligned with our internal accounting. These are generally aligned except for the extreme detail in the business lending section as mentioned in our #1 comment above.
4. Regarding whether the instructions were adequate, we believe there could be more examples added in the descriptions of the balance sheet and income statement, specifically the income statement expense line items. We encounter other credit unions that report items on different lines, which makes comparison difficult. Some examples would include software and third party system usage, temporary staffing, as well as income taxes for state-chartered credit unions.

5. For your question about reorganization of the Call Report or Profile, we feel the Profile should only include items that are updated infrequently. We believe the values of CUSO investments do not belong in the Profile but rather in the Call Report. Likewise many of the items on page 6 of the Call Report could be moved to the Profile. Questions such as number of members that use the website could be changed to be a range answer (for example greater than 50%) instead of an exact number.
6. As far as other concerns, we believe the due dates for the Call Report could and should be extended until the end of the month. This would give credit unions more time to accurately complete their reports. In addition, it would allow for a more equal number of days as all quarters are not created equal in number of business days before the due date. This would help credit unions better manage their workflow and juggle competing priorities.

Thank you for allowing us to comment. Please feel free to contact me with any questions.

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