



**NCUA**  
National Credit Union Administration

# Simplified CECL Tool

User Guide Version 1.2

September 2024

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## 1.0 Introduction

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### 1.1 Purpose

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The National Credit Union Administration (NCUA) developed the Simplified CECL Tool (CECL Tool) to help small credit unions with developing their Allowance for Credit Losses (ACL) on Loans and Leases as required under the Accounting Standards Codification (ASC) Topic 326, *Financial Instruments – Credit Losses*, known as Current Expected Credit Loss (CECL).

### 1.2 Required Systems

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| Name            | Description   |
|-----------------|---|
| Microsoft Excel | The CECL Tool is entirely contained in Microsoft Excel. It will run in Microsoft Excel 2007 and later versions. |

### 1.3 Data Requirements

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Most of the required input data is contained within the CECL Tool itself. Credit unions need to input, at minimum, the following data to calculate the ACL:

- Charter Number;
- Outstanding balance by loan portfolio segment (Call Report, Schedule A, Section 1, lines 1 through 13);
- For individually-evaluated loans, outstanding loan balances and expected collections; and
- Qualitative adjustments to net charge-off rates and Weighted Average Remaining Maturity (WARM) factors, as applicable, for each loan portfolio segment.

If qualitative adjustments are needed to arrive at the ACL, the credit union should compile the support for determining the adjustment value, including a written justification. The CECL Tool provides for qualitative adjustment to the net charge-off rate and WARM factor in each loan portfolio segment.

### 1.4 Model Description and User Input Requirements

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The CECL Tool is a Microsoft Excel-based financial analysis that allows credit unions to calculate their ACL, with separate calculations for both pooled loans and individually-evaluated loans. The CECL Tool consists of nine distinct worksheets (tabs) consisting of input and read-only tabs. The tab names and user input requirements are as follows:



| Tab Name               | User Input Requirements |
|------------------------|-------------------------|
| Overview               | Read Only               |
| Tab 0—Input            | Input                   |
| Tab 1—Summary          | Read Only               |
| Tab 2—Individual Basis | Input                   |
| Tab 3—Pooled Basis     | Read Only               |
| Tab 4—Adjustments      | Input                   |
| Tab 5—WARM Data        | Read Only               |
| Tab 6—Industry         | Read Only               |
| Tab 7—Checklist        | Input                   |

## 1.5 Model Updates

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The NCUA will update the CECL Tool quarterly. The first CECL Tool effective date was June 30, 2022. Updates will include changes to WARM factors and other data updates from the previous Call Report cycle. Each March provides an update to the Average 3-year Net Charge-off Rates. The User Guide will be updated if CECL Tool enhancements are made.

## 2.0 Procedures

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### 2.1 User Guide Format

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Organized from a practitioner perspective, this User Guide was written to provide the end user a high-level overview of the process to update the CECL Tool. The tabs with inputs are populated first before reviewing output tabs; thus, the user guide is structured to walk through the input tabs first, followed by the output tabs.

### 2.2 Access the Latest Version of the Tool

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The CECL Tool is available for download on the [NCUA’s website](#) from [The Simplified CECL Tool](#) webpage. When downloading and using the CECL Tool, users should ensure they use the most recently released version of the Excel file applicable to the quarter-end date. The CECL Tool version used should match the quarter-end Call Report. For example, the September 2024 version should be used for the September 30, 2024, Call Report.



## 2.3 Color Schema

Data can only be entered into green-shaded cells, which are available for data input. All other cells in the CECL Tool are locked. Output cells are shaded in grey and are determined either by a data lookup or formula. On input worksheets, hidden text guides users that use screen readers.

## 2.4 Tab 0—Input: Core Credit Union Data

The data entry into Tab 0 is: 1) credit union’s charter number; 2) total assets as of the quarter end; and 3) total balance of each loan portfolio segment as of quarter end.

Enter the following information:

### Cell C5: Charter Number

Enter the credit union’s charter number. The charter number is used to look up your credit union’s *Average 3-year Net Charge-off Rate*. Enter “Blank” to use the CECL Tool with Historical Loss Rates set at 0.00%. This option allows credit unions to set Loss Rates through Tab 4—Adjustments.

### Cell C7: Total Assets as of Quarter End

Enter the credit union’s total assets. This value should match Call Report account 010.

See [Figure 3.1](#) of the Appendix for an illustration of the location to populate these fields in the CECL Tool.

### Cell C10—C22: Loan Balance as of Quarter End

For each loan portfolio segment, enter the total of all loans in that category. For instance, in Cell C10, enter the total balance of all Unsecured Credit Card Loans; this value should match Call Report account 396.

If a loan portfolio segment lacks corresponding loans, enter zero (0) as the value.

Table 2.1 provides the cell references for the corresponding Call Report account codes for the required input.

**Table 2.1: Pooled Loan Data—Cell Reference and Call Report Account Codes**

| Loan Portfolio Segment                        | Cell Reference | Call Report Account |
|---|----------------|---------------------|
| Unsecured Credit Card Loans                   | C10            | 396                 |
| Payday Alternative Loans (PALs I and PALs II) | C11            | 397A                |
| Non-Federally Guaranteed Student Loans        | C12            | 698A                |



| Loan Portfolio Segment   | Cell Reference | Call Report Account |
|--|----------------|---------------------|
| All Other Unsecured Loans/Lines of Credit                              | C13            | 397                 |
| New Vehicle Loans  | C14            | 385                 |
| Used Vehicle Loans   | C15            | 370                 |
| Leases Receivable  | C16            | 002                 |
| All Other Secured Non-Real Estate Loans/Lines of Credit                | C17            | 698C                |
| Secured by 1st Lien on a single 1- to 4-Family Residential Property    | C18            | 703A                |
| Secured by Junior Lien on a single 1- to 4-Family Residential Property | C19            | 386A                |
| All Other (Non-Commercial) Real Estate Loans/Lines of Credit           | C20            | 386B                |
| Commercial Loans/Lines of Credit Real Estate Secured                   | C21            | 718A5               |
| Commercial Loans/Lines of Credit Not Real Estate Secured               | C22            | 400P                |

See [Figure 3.2](#) of the Appendix for an illustration of the location to populate these fields in the CECL Tool.

## 2.5 Tab 2—Individual Basis: Individually Evaluated Loans

Credit unions have the functionality via the CECL Tool to calculate the credit loss related to individually evaluated loans. Loans individually evaluated are excluded from ACL determination on the related loan portfolio segment by the WARM methodology. But, the CECL Tool aggregates both credit losses from individually evaluated loans and from applying the WARM methodology (See Tab 1—Summary).

For each loan that is to be individually evaluated for a credit loss, the CECL Tool requires:

- 1) Borrower or Member Name;
- 2) Note Number (identification);
- 3) Portfolio Segment;
- 4) Loan Balance as of quarter end; and
- 5) Amount Expected to be Collected.





The credit loss is determined by subtracting item (5) from item (4). When entering a loan to be individually evaluated, item (3) must be selected from the dropdown menu, and items (4) and (5) must be entered; with this data, the loan balance and its ACL are excluded from the WARM methodology calculation.

A good practice is to enter each loan and agree the total of loans per loan portfolio segment to the related master records or subledger. For example, the total of all New Vehicle Loans individually evaluated on Tab 2 should match the total of such loans in the master records. The portfolio segment totals can be found in the summary table at the top of the tab. Other forms of reconciliations may be needed to ensure that loans are properly included in their loan portfolio segment.

Enter the following information:

***Important:** The table to enter each loan begins in Row 29. Each row should be one individually evaluated loan. Add rows in the green shaded area if more rows are needed for loans.*

**Column A: Borrower or Member Name**

Enter the borrower's name or identification code.

**Column B: Note Number**

Enter the borrower's loan account number.

**Column C: Portfolio Segment**

Click the cell, then click the dropdown icon to the right of the cell. Select the Portfolio Segment from the listed options.

**Column D: Loan Balance; Column E: Amount Expected to be Collected**

Enter the outstanding Loan Balance and the Amount Expected to be Collected into these columns. If the expected amount to be collected is greater than the loan balance, the resulting credit loss will be zero (0) due to the cap on the collection amount equal to the loan balance.

***Important Note:** If more rows are needed, right click the whole row at Row 30 or below and chose Insert. This ensures that loan information is properly calculated by the CECL Tool.*

See [Figure 3.3](#) of the Appendix for an illustration of the location to populate these fields in the CECL Tool.

## **2.6 Tab 4—Adjustments: Qualitative Adjustments**

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The CECL Tool can be used to adjust the initial net charge-off rate and WARM factor values that are used to calculate the ACL on Tab 4. In general, qualitative adjustments are used to add the values or estimates that are missing from the quantitative values.





Credit unions use qualitative adjustments to calibrate and refine both the charge-off rates and the WARM factors. The qualitative adjustments work as an addition to or subtraction from the original value. For example, if an economic recession is expected, the historical charge-off rate is increased to include expected losses that are excluded in the original charge-off rate. The original charge-off rate may not cover a period of an entire business cycle, which includes a recession. Also, if higher than historical inflation exists, the WARM factor is increased to adjust for the slowing of prepayments. Due to higher inflation and increased borrowing rates, debtors will likely slow down refinancing or paying off their loans early.

The CECL accounting standard states that qualitative adjustments are expected when the starting point for determining credit losses is the historical net charge-off rates, such as with the WARM methodology.

“An entity shall not rely solely on past events to estimate expected credit losses. When an entity uses historical loss information, it shall consider the need to adjust historical information to reflect the extent to which management expects current conditions and reasonable and supportable forecasts to differ from the conditions that existed for the period over which historical information was evaluated.” (ASC 326-20-30-9)

If utilized, enter the following:

### **Column B: Loss Rate Adjustment for Qualitative Factors**

Enter the adjustments to the historical net charge-off rate, per loan portfolio segment into this column.

### **Column C: Justification for Loss Rate Adjustment**

Enter the qualitative factors that justify the net charge-off rate adjustment figure in Column B, along with a short description of the reasoning. Separately from the CECL Tool, prepare documentation that supports and justifies the qualitative adjustment. The list of qualitative factors that might justify a need for adjustments is provided on this tab. Also, see the [FAQ document](#) for more guidance around calculating qualitative adjustments.

### **Column D: WARM Adjustment**

Enter the adjustments to the WARM factor, per loan portfolio segment into this column.

### **Column E: Justification for WARM Adjustment**

Enter the qualitative factors that justify the WARM factor adjustment figure in Column D, along with a short description of the reasoning. Separately from the CECL Tool, prepare documentation that supports and justifies the qualitative factors. The list of qualitative factors that might justify a need for adjustments is provided on this tab. Also, see the FAQ document for more guidance on calculating qualitative adjustments.



See [Figure 3.4](#) of the Appendix for an illustration of the location to populate these fields in the CECL Tool.

## 2.7 Tab 1—Summary: Total Estimated Credit Losses

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Tab 1 is a read-only Excel sheet that contains the model's output, credit losses for individually evaluated loans and pooled loans by loan portfolio segment. Please review the outputs on this tab for reasonableness as well as unintuitive outcomes.

The overall results of this Tab, Total Estimated Loss on Total Loans and Leases (Cell E16), must match the Allowance for Credit Losses on Loans and Leases, Call Report account AS0048.

### Column E: Total Estimated Loss

Values in this column are the ACL outputs for each loan portfolio segment. The values are the total of the estimated credit losses on individually evaluated loans (Column B) and of the estimated credit losses on pooled loan evaluated under the WARM methodology (Column C). The total of all the loan portfolio segments (Cell E16) is the Allowance for Credit Losses on Loans and Leases, Call Report account AS0048.

### Column F: Reserve Ratio

Contains the ACL Reserve Ratio on each loan portfolio segment as well as on the total of all loan portfolio segments.

See [Figure 3.5](#) of the Appendix for an illustration of this tab in the CECL Tool.

## 2.8 Tab 3—Pooled Basis: WARM Application

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Tab 3 is a read-only Microsoft Excel sheet that shows the application on the WARM methodology on each loan portfolio segment. The CECL Tool calculates the ACL for a loan portfolio segment (Column Q) by multiplying the period-end loan portfolio balance, the average annual charge-off rate, and the WARM factor. Please review the additional outputs on this tab for reasonableness and unintuitive outcomes. To facilitate the analysis, ACL value per loan portfolio segment is separated by the quantitative portion (Column O) and qualitative portion (Column P).

As noted in Section 2.6, the CECL accounting standard requires the consideration of qualitative adjustments. Under the previous methodology for determining the allowance for loan and lease losses, which was the incurred loss methodology, qualitative adjustments were made to the allowance for loan and lease losses by credit union management to consider the current economic environment as well as default risk of members and loan products. The same concept continues with CECL.



### **Column G: Historical Loss Rate**

This column contains the historical loss rate per loan portfolio segment. This figure is individualized by credit union based on the average 3-year net charge off rate. The value is calculated from Call Report data. Historical loss rate calculation details are provided under the General Resources section of [The Simplified CECL Tool](#) webpage.

### **Column H: Loss Rate Adjustment for Qualitative Factors**

Contains the qualitative adjustment provided by the user in Tab 4.

### **Column I: Applicable Loss Rate on Pooled Basis**

Sum of Column G and Column H.

### **Column K: Weighted Average of Remaining Maturity**

Contains the WARM factor per loan portfolio segment. The NCUA provides this WARM factor, which is based on loan portfolio data for peer credit unions (See the [FAQs](#) for added discussion on the WARM factor).

### **Column L: Adjustment to WARM**

Contains the qualitative adjustment provided by the user in Tab 4.

### **Column M: Applicable WARM**

Sum of Column K and Column L.

### **Column Q: Combined CECL Pooled Lifetime Loss**

This value is calculated by multiplying Column E, Column I, and Column M. This column's output is also shown on Tab 1—Summary.

See [Figure 3.6](#) of the Appendix for an illustration of this tab in the CECL Tool.



## 3.0 Appendix

Figure 3.1: Tab 0 Inputs—Enter Charter Number and Total Assets

| A   | B  | C            | D |
|---|--|--------------|---|
| Credit unions are responsible for all inputs in green cells (Column C) of this tab. |  |              |   |
| 4   | Quarter End Date, for Call Report submission                           | #N/A         |   |
| 5   | CU Number  | 0            | ← |
| 6   | Credit Union Name  | #N/A         |   |
| 7   | Total Assets   | \$ -         | ← |
|   |  | Loan Balance |   |
| 10 1.   | Unsecured Credit Card Loans  | \$ -         |   |
| 11 2.   | Payday Alternative Loans (PALs I and PALs II) (FCU Only)               | \$ -         |   |
| 12 3.   | Non-Federally Guaranteed Student Loans                                 | \$ -         |   |
| 13 4.   | All Other Unsecured Loans/Lines of Credit                              | \$ -         |   |
| 14 5.   | New Vehicle Loans  | \$ -         |   |
| 15 6.   | Used Vehicle Loans   | \$ -         |   |
| 16 7.   | Leases Receivable  | \$ -         |   |
| 17 8.   | All Other Secured Non-Real Estate Loans/Lines of Credit                | \$ -         |   |
| 18 9.   | Secured by 1st Lien on a single 1- to 4-Family Residential Property    | \$ -         |   |
| 19 10.  | Secured by Junior Lien on a single 1- to 4-Family Residential Property | \$ -         |   |
| 20 11.  | All Other (Non-Commercial) Real Estate Loans/Lines of Credit           | \$ -         |   |
| 21 12.  | Commercial Loans/Lines of Credit Real Estate Secured                   | \$ -         |   |
| 22 13.  | Commercial Loans/Lines of Credit Not Real Estate Secured               | \$ -         |   |
| 23 14.  | Total Loans and Leases   | \$ -         |   |

Figure 3.2 Tab 0 Inputs—Enter Loan Portfolio Segment Balances

| A   | B  | C            | D |
|---|--|--------------|---|
| Credit unions are responsible for all inputs in green cells (Column C) of this tab. |  |              |   |
| 4   | Quarter End Date, for Call Report submission                           | #N/A         |   |
| 5   | CU Number  | 0            |   |
| 6   | Credit Union Name  | #N/A         |   |
| 7   | Total Assets   | \$ -         |   |
|   |  | Loan Balance |   |
| 10 1.   | Unsecured Credit Card Loans  | \$ -         | ← |
| 11 2.   | Payday Alternative Loans (PALs I and PALs II) (FCU Only)               | \$ -         | ← |
| 12 3.   | Non-Federally Guaranteed Student Loans                                 | \$ -         | ← |
| 13 4.   | All Other Unsecured Loans/Lines of Credit                              | \$ -         | ← |
| 14 5.   | New Vehicle Loans  | \$ -         | ← |
| 15 6.   | Used Vehicle Loans   | \$ -         | ← |
| 16 7.   | Leases Receivable  | \$ -         | ← |
| 17 8.   | All Other Secured Non-Real Estate Loans/Lines of Credit                | \$ -         | ← |
| 18 9.   | Secured by 1st Lien on a single 1- to 4-Family Residential Property    | \$ -         | ← |
| 19 10.  | Secured by Junior Lien on a single 1- to 4-Family Residential Property | \$ -         | ← |
| 20 11.  | All Other (Non-Commercial) Real Estate Loans/Lines of Credit           | \$ -         | ← |
| 21 12.  | Commercial Loans/Lines of Credit Real Estate Secured                   | \$ -         | ← |
| 22 13.  | Commercial Loans/Lines of Credit Not Real Estate Secured               | \$ -         | ← |
| 23 14.  | Total Loans and Leases   | \$ -         |   |





**Figure 3.3: Tab 2 Inputs—Individual Basis Loan Data Population**

| Credit unions are responsible for all inputs in green cells (Columns A through E) of this tab; Scroll down for input area. |                |   |              |                                 |           |
|--|----------------|---|--------------|---------------------------------|-----------|
| Borrower/Member Name   | Note Number(s) | Portfolio Segment, select from drop-down list | Loan Balance | Amount Expected to be Collected | CECL ACL  |
| John Doe   | 1000-2043      | Unsecured Credit Card Loans                   | \$ 25,000.00 | \$ 10,000.00                    | \$ 15,000 |
| John Doe   | 1000-2044      | Payday Alternative Loans                      | \$ 6,000.00  | \$ 4,500.00                     | \$ 1,500  |
|  |                |   |              |                                 | \$ -      |
|  |                |   |              |                                 | \$ -      |
|  |                |   |              |                                 | \$ -      |
|  |                |   |              |                                 | \$ -      |

**Figure 3.4: Tab 4 Inputs—Adjustments to Loan Data Population**

| Credit unions are responsible for all inputs in green cells (Columns B through E) of this tab. |  |  |                               |                                   |
|--|--|--|-------------------------------|-----------------------------------|
| Portfolio Segments   | Loss Rate Adjustment for Qualitative Factors | Justification for Loss Rate Adjustment | Adjustment to WARM (in years) | Justification for WARM adjustment |
| Unsecured Credit Card Loans  | 0.00%  |  | 0.00                          |                                   |
| Payday Alternative Loans   | 0.00%  |  | 0.00                          |                                   |
| Non-Federally Guaranteed Student Loans   | 0.00%  |  | 0.00                          |                                   |
| New Vehicle Loans  | 0.00%  |  | 0.00                          |                                   |
| Used Vehicle Loans   | 0.00%  |  | 0.00                          |                                   |
| Leases Receivable  | 0.00%  |  | 0.00                          |                                   |
| Real Estate Secured Consumer Loans   | 0.00%  |  | 0.00                          |                                   |
| Commercial Loans/Lines of Credit Real Estate Secured   | 0.00%  |  | 0.00                          |                                   |
| Commercial Loans/Lines of Credit Not Real Estate Secured                                       | 0.00%  |  | 0.00                          |                                   |
| All Other Loans  | 0.00%  |  | 0.00                          |                                   |
| Average  | 0.00%  |  | 0.00                          |                                   |

**Figure 3.5: Tab 1 Summary—Outputs**

| All values in this tab are automatically filled.                        |              |                                   |                               |                      |               |
|---|--------------|-----------------------------------|-------------------------------|----------------------|---------------|
| Instructions ->   |              | From Tab 2 (Last Row)             | From Tab 3 (Column N)         | Calculated           | Calculated    |
|   | A            | B                                 | C                             | D = B + C            | E = D / A     |
| Loan Portfolio Segment  | Loan Balance | Loss Assessed on Individual Basis | Loss Assessed on Pooled Basis | Total Estimated Loss | Reserve Ratio |
| Unsecured Credit Card Loans <sup>(1)</sup>                              | \$ 10,000    | \$ -                              | \$ 171                        | \$ 171               | 1.71%         |
| Payday Alternative Loans <sup>(2)</sup>                                 | \$ 250,000   | \$ -                              | \$ 13,203                     | \$ 13,203            | 5.28%         |
| Non-Federally Guaranteed Student Loans <sup>(3)</sup>                   | \$ 3         | \$ -                              | \$ -                          | \$ -                 | 0.00%         |
| New Vehicle Loans <sup>(4)</sup>  | \$ 120,000   | \$ -                              | \$ 1,424                      | \$ 1,424             | 1.19%         |
| Used Vehicle Loans <sup>(5)</sup>                                       | \$ 6         | \$ -                              | \$ 0                          | \$ 0                 | 0.99%         |
| Leases Receivable <sup>(6)</sup>  | \$ 7         | \$ -                              | \$ -                          | \$ -                 | 0.00%         |
| Real Estate Secured Consumer Loans <sup>(7)</sup>                       | \$ 30        | \$ -                              | \$ (0)                        | \$ (0)               | -0.02%        |
| Commercial Loans/Lines of Credit Real Estate Secured <sup>(8)</sup>     | \$ 12        | \$ -                              | \$ 0                          | \$ 0                 | 1.05%         |
| Commercial Loans/Lines of Credit Not Real Estate Secured <sup>(9)</sup> | \$ 13        | \$ -                              | \$ (0)                        | \$ (0)               | -0.34%        |
| All Other Loans <sup>(10)</sup>   | \$ 12        | \$ -                              | \$ 0                          | \$ 0                 | 2.98%         |
| Total Loans and Leases <sup>(11)</sup>                                  | \$ 380,083   | \$ -                              | \$ 14,798                     | \$ 14,798            | 3.89%         |



Figure 3.6: Tab 3 Pooled Basis—Outputs

All values in this tab are automatically filled.

|   | Call Report Date  | From Tab 2 (Last Row)              | Calculated     | Weighted average 3 year Net Chargeoff rate using Call Report data | From Tab 4 (Column 6)                        | Calculated                           | WARM                           | From Tab 4 (Column D) | Calculated      | Calculated                |
|---|-------------------|------------------------------------|----------------|---|--|--------------------------------------|--------------------------------|-----------------------|-----------------|---------------------------|
|   | A                 | B                                  | C = A - B      | D   | E  | F = D + E                            | G                              | H                     | I = G + H       | C***)                     |
| Loan Balance by Portfolio Segment (Must Correspond to Call Report Page 6) | Loan Balance      | Loans Assessed on Individual Basis | Pooled Balance | Historical Loss Rate  | Loss Rate Adjustment for Qualitative Factors | Applicable Loss Rate on Pooled Basis | Peer Weighted Average Maturity | Adjustment to WARM    | Applicable WARM | CECL Pooled Lifetime Loss |
| Unsecured Credit Card Loans <sup>(1)</sup>                                | \$ 10,000         | \$ -                               | \$ 10,000      | 0.71%   | 1.00%  | 1.71%                                | 1.00                           | 0.00                  | 1.00            | \$ 171                    |
| Payday Alternative Loans <sup>(2)</sup>                                   | \$ 250,000        | \$ -                               | \$ 250,000     | 5.28%   | 0.00%  | 5.28%                                | 1.00                           | 0.00                  | 1.00            | \$ 13,200                 |
| Non-Federally Guaranteed Student Loans <sup>(3)</sup>                     | \$ -              | \$ -                               | \$ -           | 0.00%   | 0.00%  | 0.00%                                | 7.75                           | 0.00                  | 7.75            | \$ -                      |
| New Vehicle Loans <sup>(4)</sup>  | \$ 120,000        | \$ -                               | \$ 120,000     | 0.33%   | 0.00%  | 0.33%                                | 3.63                           | 0.00                  | 3.63            | \$ 1,424                  |
| Used Vehicle Loans <sup>(5)</sup>   | \$ 6              | \$ -                               | \$ 6           | 0.30%   | 0.00%  | 0.30%                                | 3.29                           | 0.00                  | 3.29            | \$ -                      |
| Leases Receivable <sup>(6)</sup>  | \$ 7              | \$ -                               | \$ 7           | 0.00%   | 0.00%  | 0.00%                                | 1.00                           | 0.00                  | 1.00            | \$ -                      |
| Real Estate Secured Consumer Loans <sup>(7)</sup>                         | \$ 30             | \$ -                               | \$ 30          | 0.00%   | 0.00%  | 0.00%                                | 8.34                           | 0.00                  | 8.34            | \$ 0                      |
| Commercial Loans/Lines of Credit Real Estate Secured <sup>(8)</sup>       | \$ 12             | \$ -                               | \$ 12          | 0.13%   | 0.00%  | 0.13%                                | 8.34                           | 0.00                  | 8.34            | \$ 0                      |
| Commercial Loans/Lines of Credit Not Real Estate Secured <sup>(9)</sup>   | \$ 14             | \$ -                               | \$ 14          | -0.08%  | 0.00%  | -0.08%                               | 4.31                           | 0.00                  | 4.31            | \$ 0                      |
| All Other Loans <sup>(10)</sup>   | \$ 12             | \$ -                               | \$ 12          | 0.79%   | 0.00%  | 0.79%                                | 3.77                           | 0.00                  | 3.77            | \$ 0                      |
| <b>Total Loans and Leases <sup>(11)</sup></b>                             | <b>\$ 380,083</b> |                                    |                |   |  |                                      |                                |                       |                 | <b>\$ 18,798</b>          |