

# NCUA Annual Supervisory Stress Test Supplemental Data Request Frequently Asked Questions

This document provides answers to frequently asked questions about NCUA's Annual Supervisory Stress Test Supplemental Data Request ("Supplemental Data Request"). Each section below contains questions corresponding to one of the sections in the Supplemental Data Request.

#### 1. Investment Portfolio and Deposit Assets

The Supplemental Data Request asks for security-level investment data. Do these data include just securities or all investments?

The data request is for instrument-level data for all types of investments. These data are typically provided in a tabular format (e.g., spreadsheet, CSV) with a row for each investment and columns for the different information requested on each product. As noted in the instructions, columns should include the Snapshot Date, CUSIP/Identifier, Portfolio, Position, Description, Settlement Date, Original Par Value, Current Par Value, Book Value/Price, Market Value/Price, accounting classification, and any investment ratings (e.g., internal, external rating). For non-public investments, also include columns for contractual terms (e.g., Coupon Type, Payment Frequency, Compound Frequency, Maturity, Sinking Funds, Whether Callable of Puttable, Any Third-Party Guarantees), and any collateral details (if applicable).

Cash on deposit assets are reported in the Call Report. Why is additional information requested in the Supplemental Data Request?

The Call Report requests aggregate information on the outstanding asset balances held as cash on deposit and time deposits at other financial institutions but does not include information on the interest or dividend yields associated with these deposits. Data on account-level balances and yields are useful for projecting interest income in the NCUA Supervisory Stress Test (SST). Providing data in a tabular format (e.g., spreadsheet, CSV) with a row for each cash deposit account and columns for the account information (e.g., Account ID, Account Name, Account Description, Financial Institution, Term, Balance, Yield) is a best practice.



The request mentions cash assets on deposit, but our credit union also has time deposit assets at other financial institutions. Should those be included in the provided data too?

Include information on time deposit assets held at other financial institutions along in the submitted cash on deposit file. See the prior question for formatting best practices.

#### 2. Instrument-Level Term Funding

The instrument-level term funding section lists Federal Home Loan Bank (FHLB) advances as an example. What other types of funding should be provided in the Supplemental Data Request?

The FHLB advances were provided as an example, but as noted in supplemental request item 2.1, the request covers contractual terms for all external funding. It is a best practice to provide data in a tabular format (e.g., spreadsheet, CSV) with a row for each borrowing, advance or other funding type and columns for the funding identification information and contractual terms (e.g., Unique ID, Name, Description, Product Type, Original Balance, Outstanding Balance, Issue Date, Maturity Date, Coupon Repayment Frequency, Principle Repayment Frequency, Coupon Type, Coupon, First Coupon Pay Date, Index Name, Repricing Spread, Put/Call, Interest Only Flag).

Although the request asks for FHLB advances in a separate spreadsheet or worksheet, credit unions can report all borrowings, including FHLB advances, in the same tabular file if they clearly indicate the FHLB Advances in their submission's product type column (so NCUA can easily identify them).

#### 3. Summary Product-Level Deposit Data

The Supplemental Data Request asks credit unions to provide summary, product, and category level deposit data in the format used in prior years. What should be submitted?

A best practice is to provide the data in a tabular format (spreadsheet, csv) with a row representing a specific product at a given point in time, with columns noting the product category, specific product, date, pricing (multiple columns may be used to indicate pricing tiers), and balance. Provide historical data back to 12/31/1998 (or product start date if it started after this date) for each product if possible. NCUA recognizes that products will change overtime, including a column



mapping the products to the broader Call Report Schedule C, Section 2 product categories (e.g., Share Drafts, Money Market Shares, IRA/KEOGH accounts, etc.) allows NCUA to analyze the data at a product-level, but also to aggregate the data as needed.

#### 4. Internal Balance Sheet and Financial Data

The Supplemental Data Request asks for a balance sheet with more granularity than included in the Call Report. What level of granularity is typically submitted?

The goal of this supplemental data request is to better understand the composition of the credit union's balance sheet so it can be modeled appropriately in the NCUA SST. Additional granularity is already available on investments, borrowings, and cash on deposits from other parts of the supplemental request. Granular loan and deposit data are collected as part of the standard quarterly data collection. Therefore, to reduce the data submitted under this request, credit unions can just provide a more granular breakdown for the Call Report line for All Other Assets (Account 009C). It is a best practice to provide this information in a tabular format (spreadsheet, CSV) to provide rows for the granular elements of All Other Assets and columns indicating the value on each reporting date.

The quarterly loan-level data collection includes data that could be used to calculate weighted-average interest rates. Why do these data need to be submitted as part of the Supplemental Data Request?

The loan-level data submission covers recent periods. The historical data provides NCUA with additional historical context on loan interest rates and are useful for reconciling the quarterly loan-level data.

### 5. Summary Portfolio-Level Loan Performance Data

The Supplemental Data Request asks for performance data for several credit metrics in the same format as prior years. Do all the metrics need to be provided? Should they all be submitted in the same file or separate files?

The goal of this request is to collect historical rates of key portfolio-level metrics. For credit unions that have submitted data in past years, submit summary deposits for the most recent 12 months (December 31, 2021, to December 31, 2022). For



credit unions submitting data for the first time, provide historical data between 12/31/2017 and 12/31/2019 (i.e. 36 months of performance data ending 12/31/2019) for each product if possible. It is a best practice to provide the data in tabular format with rows indicating a portfolio at a point in time, and columns defining the date, portfolio, and credit risk metrics (prepayment rate, total delinquency rate, 90-day delinquency rate, net charge-off rates, default rates, loss severity rates).

It is a best practice to provide portfolios that align with the self-run stress test reporting and portfolios reconciled against the Call Report in the standard data collection (e.g., new auto loans, used auto loans, first-lien mortgage loans, home equity loans/lines, other consumer real estate loans, student loans, other secured consumer loans, other unsecured consumer loans, commercial real estate loans, commercial non-real estate loans). This lets us compare the data with the other data you have submitted.

Our credit union doesn't classify credit cards as revolvers or transactors. How should our credit union report the percentage of the credit card portfolio balance associated with revolvers?

The goal of this supplemental data request is to better understand the portion of the credit card portfolio that yields interest income each month. Credit unions typically provide the percentage of their credit card portfolio's balance that is from revolvers by month.

If your credit union does not have an internal policy for classifying credit cards as revolvers (accounts bearing interest income, in contrast to transactor accounts that don't earn interest, but have transaction income) the percentage can be calculated using the percentage of credit card balances that incurred interest each month. However, if your credit union has an internal policy for classifying credit cards as revolvers it should be used to report the percentage for each monthly period. Calculate the percentage as a percentage of loan volume, not loan counts.

The credit card portfolio balance percentage associated with revolver accounts asks for the reported analysis to be based on the last year. Is the reported data typically monthly or aggregate for the year?

Credit unions typically report the percentage breakdown for each month.



## 6. CECL Day One Transition Adjustment

Provide a schedule, in MS Excel format, detailing the amount of the CECL "Day One Transition Amount" recorded along with an amortization schedule, as allowed for under  $\S702.703$  of the Rules and Regulation, of that amount over the SST forecast horizon .