7535-01-U
NATIONAL CREDIT UNION ADMINISTRATION
Electronic Loan, Deposit, and Investment Data Collection

Submitted by:
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Cheyenne, WY
Assets: $58 million
Charter: Community

Question 1. To the extent a FICU offers the loan and deposit services and has the investment instruments identified in the section b, are there any example data fields listed in this RFI that cannot be reasonably provided electronically?

Table 2 (Deposit Electronic Fields) Data fields that present difficulties in providing electronically (1)
D21 (Last File Maintenance User ID or Initials)
The last File Maintenance date is stored in the Share Record, information on the user that performed the last file maintenance is stored in a separate data file. Retrieving this information and connecting it to a specific share record is complex. Adding this field would require an enhancement from our core vendor and even if undertaken, would likely not be available for at least 24 months after the requirements are finalized.

Table 2 (Deposit Electronic Fields) Missing Fields (2)
There is no field for deposit accounts similar to C14 (Loan ID) for credit accounts.
There is no 'open date' field for regular deposit accounts.

Table 4 (Consumer and Credit Card Loan Fields) Data fields that present difficulties in providing electronically (3)
C12 (Business Type)
We currently store information on employer and occupation. However, converting this to the NAICS code would require considerable work at the credit union. Providing this information on loans originated after the requirements are finalized would not be unduly burdensome.

C88 (Last File Maintenance User ID or Initials)
The last File Maintenance date is stored in the Loan Record, but information on the user that performed the last file maintenance is stored in a separate data file. Retrieving this information and connecting it to a specific loan record is complex. Adding this field would require an enhancement from our core vendor and even if undertaken, would likely not be available for at least 24 months after the requirements are finalized.

C89 (Last File Maintenance Action Code)
The last File Maintenance date is stored in the Loan Record, but information on the action taken is stored in a separate data file. Retrieving this information and connecting it to a specific loan record is complex. Adding this field would require an enhancement from our core vendor and even if

undertaken, would likely not be available for at least 24 months after the requirements are finalized.

Table 4 (Consumer and Credit Card Loan Fields) Duplicate Fields (2)
Fields C16 (Loan Type) and C30 (Loan Type) request the same data.

Table 4 (Consumer and Credit Card Loan Fields) Additional Comment
There are fields such as those related to the original credit score (C40, C41, C46, C48, C51) and debt to income (C70) that would not be available and in some cases impossible to recreate for lines-of-credit (including credit cards) that were originated several years ago.

Question 2. For electronic data, what file formats (e.g., Microsoft Excel, CSV, etc.) are available?
We can provide the information in Microsoft Excel (.xls and .xlsx), Comma Delimited (.csv) or as plain text (.txt). The most efficient would be Comma Delimited (.csv) because this would come directly from our core system and not require any manual processing. Use of the Excel formats presents problems for larger credit unions due to the size limitations in the software.

Question 3. If a FICU cannot provide data electronically, to what extent is the limitation due to the IT systems (e.g., the field is not available in the IT system to be captured electronically)? To what extent is the limitation because a credit union is not electronically collecting the data now (e.g., loan underwriting information captured in the loan file, such as a calculated debt to income ratio, but is not stored in an IT system that can capture that data)?
Both situations exist for us. See responses to #1 above for more detail.

Question 4. What is the number of vendors, systems, or service providers the FICU uses for loans (all types), deposits, and investments you currently can or would extract data for examination purposes? Specifically, how many are used for each category (e.g., loans, deposits, and investments)?

Systems for Shares:	1
Systems for Loans:	1
Systems for Investments	2

Question 5. To what extent does the FICU rely on a third-party vendor to create and produce raw data downloads? Does the vendor provide the credit union with the flexibility to self-customize reporting for data attributes?
Although our core system has the functionality to create custom downloads, we rely on the vendor for the current AIRES download. The current AIRES download can be customized to meet our specific needs.

Question 6. What are the technological challenges NCUA should consider with a standardized data format (e.g., specific file names, format, etc.)?
File and field names should adhere to the standards set forth in the Credit Union Financial Exchange (CUFX) schema. This standard is designed for and by credit union IT professionals in cooperation with many core processors.

Question 7. What additional initial and annual costs would you estimate a FICU could incur to generate and provide data electronically in a standard format (e.g., pass through costs from vendors, in-house development resources, etc.)?
Initial costs: $1,000 to $2,000
Annual costs: $500 to $1,000

Question 8. Does the credit union or vendor have the ability to retain and create the current loan and share download data format (with no changes) as well as new download data formats?

Yes, but having to supply multiple files in multiple formats increases the security risks and burden related to the exam process. NCUA systems should be updated as quickly as credit union are expected to update theirs.

Question 9. Should NCUA eliminate the "critical" and "optional" data categorizations discussed in NCUA Letter to Credit Unions 03-CU-05?

Having information that is provided by some credit unions and not by others decreases the value of analytics based on this information. So, eliminating the optional category is preferable. This does not mean all data currently categorized as option should be required. See #1 above concerning some of the data fields currently categorized as "optional".

If yes, what approaches would you propose NCUA use to collect standardized data for better analytics and examination efficiencies?

Providing clear guidance and specifications and using industry recognized naming and format conventions is the best way to insure standardized data collection.

Question 10. With the exception of the example data formats based on data type discussed in this RFI, what alternatives would you propose for NCUA to collect data in a standardized format that minimizes the credit union burden?

As noted in #2 above, the most efficient would be Comma Delimited (.csv). This format would not require any manual processing by the credit union and avoids the limitations of other formats.

Question 11. What implementation strategies and timeline should NCUA consider with this modernization? For example, what is the anticipated timeframe for a FICU or vendor to provide the sample data fields and the associated format?

Except for the items noted in #1 above, sample data could be provided within the annual enhancement schedule of our core vendor. This means we would be able to provide this within 18 months of finalization.

Question 12. What specific information security controls or assurances are expected from NCUA to reasonably safeguard the electronic loan, share, and investment data?

In transit, data should be encrypted using a minimum of 128-bit SSL. Data at rest should be encrypted using a minimum of 256-bit AES. Moving forward encryption for data needs to be protected both in transit and at rest using the most current recommendations from NIST.

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