

CUNA Call Report Working Group

Roadmap to Call Report Improvements

Call Report Schedule:	Page/Line #:	Problem:	Solution:
Statement of Financial Condition	<i>Page 2, Lines 15-24</i>	Interest Rate Column is not relevant to the current environment particularly with Risk Based Pricing. NCUA can use interest income to look at trends. If this is not eliminated, it should contain the weighted average as a more useful metric. The parameters for a rate “exception” should be updated to the current rate environment so that a Warning report does not appear for rates less than or more than a certain rate (i.e. Rates under 4% receive a warning although that is typical in the current rate environment)	Delete the Interest Rate Column.
Statement of Financial Condition	<i>Page 2, Line 26</i>	<ol style="list-style-type: none"> 1. Need to consider the effect of CECL expected credit loss/FASB changes (although not effective until 2021). 2. Information on TDR’s is reported in various places in different contexts. 	<ol style="list-style-type: none"> 1. Make necessary revisions to contemplate CECL/FASB changes in 2021. 2. Revise to either remove TDRs completely as no longer of a significant supervisory benefit or combine/summarize TDR information from pages 14 and 16. Move the TDR and Real Estate Allowance information from pages 14 and 16 to Page 2, Line 26 so that they are all in one place and consistent.
Statement of Financial Condition	<i>Page 3, Lines 1-9</i>	The liabilities section does not include the breakdown of liabilities from other sections. These should all be together in one place.	Combine information from Page 10 into one section with the Credit and Borrowing Arrangements Section.
Statement of Financial Condition	<i>Page 3, Lines 10-17</i>	The Dividend Rate Column is not relevant to the current environment particularly with Risk Based Pricing. NCUA can use interest expense to look at trends. We highly recommend this column be eliminated. If NCUA must require reporting, it should contain the weighted average as a more useful metric, however, this will be a burden on a credit union to track this with little or not benefit. The parameters for a rate “exception” should be updated to the current rate environment so that a Warning report does not appear for rates less than or more than a certain rate (i.e. Deposit	Delete the Interest Rate Column.

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		rates under 2% receive a warning although that is typical in the current rate environment).	
Statement of Financial Condition	<i>Page 3, Lines 19-25</i>	The usefulness of this information to NCUA is questionable. Alternatively, it does not need to be reported quarterly.	These lines should be removed, or alternatively, included in the profile, but should not be required to be reported quarterly.
Statement of Income and Expense	<i>Page 5, Lines 1-5</i>	This section does not include a place for Interest on Loans Held for Sale.	Revise to add in a line for Interest on Loans Held For Sale with corresponding alignment to Page 1.
Statement of Income and Expense	<i>Page 5, Lines 6 – 11</i>	This section does not allow a determination of interest expense related to hedging or borrowings due to Arbitrage. This prevents accurate Peer-to Peer Analysis that would be beneficial to the NCUA and to credit unions.	Add in two lines: 1. For expenses related to hedging; and 2. For borrowings due to arbitrage.
Statement of Income and Expense	<i>Page 5, Lines 6 – 11</i>	There should be a breakout for Special Dividends paid to members or for bonuses/rewards/interest rebates or alternatively, allow credit unions to utilize judgment as to where this should be included. These type of programs can vary widely among credit unions.	Add in a breakout for Special Dividends paid to members or even better, allow the credit union to utilize judgment as to where it should be included as programs will differ widely among credit unions.
Statement of Income and Expense	<i>Page 5, Line 32</i>	Transfers to Regular Reserves are now prohibited so this line is unnecessary.	Remove the line or allow credit unions to move the Regular Reserve back to Undivided Earnings.
Miscellaneous Information	<i>Page 6, Lines 1-12</i>	Most of this information could potentially be moved to the Profile and does not need to be updated quarterly.	Move this information to the Profile and do not require quarterly reporting.

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Miscellaneous Information	<i>Page 6, Line 3</i>	The determination of the number of potential members is unclear from the instructions.	Revise the instructions for this number to clarify how the NCUA wants a credit union to determine the number of potential members. If census date will suffice, please clarify that in the instructions.
Miscellaneous Information	<i>Page 6, Line 6</i>	Any credit union merger requires NCUA approval where this information will be submitted. It should not have to be re-reported on the call report. If the answer is "Yes" to the question on Line 6, it requests completion of information on another page.	Remove this question as NCUA already has the information. If the question is retained, move the information requested from Page 11 to Page 6 so that it is together.
Miscellaneous Information	<i>Page 6, Line 7</i>	This question appears to be outdated as transactional websites are now the established norm for credit unions.	This question should be removed.
Miscellaneous Information	<i>Page 6, Lines 10 – 11</i>	The value of this information is questionable for purposes of the call report.	Remove these lines.
Delinquent Loans By Collateral Type	<i>Page 7, Lines 1-10a</i>	There should be a line for total business loans that agrees to the MBL breakouts from Page 8, Lines 16a-21a as opposed to including MBLs in all other categories of loans and then breaking them out on page 8.	Revise to insert a line for total business loans together with the Page 8, Lines 16a-21a breakouts.
Delinquent Loans By Collateral Type/Additional Delinquency Information	<i>Page 7 and Page 8</i>	These two forms should be combined for ease of use. Current (non-delinquent) Loan information would present a better picture of delinquency information. Further a current Loan Column should be added.	Combine Pages 7 and 8 and add a column that contains current Loan Information that flows into Page 7 from Page 8.
Additional Delinquency Information	<i>Page 8, Lines 16a-21a</i>	MBL information is scattered throughout the call report.	Recommend consolidating MBL information to one place (Page 15 is the most logical) and ensuring level of detail requested is necessary for supervisory purposes.

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<i>Additional Delinquency Information</i>	<i>Page 8, Lines 22b-27b</i>	TDR information is scattered throughout the call report.	Absent a decision to remove TDR information or retain only needed high level information, recommend moving this information to Page 16 so that TDR is all in one place and consistent.
<i>Loan Charge Offs and Recoveries</i>	<i>Page 9, Lines 16-21</i>	MBL information is scattered throughout the call report.	Recommend moving to Page 15.
<i>Loan Charge Offs and Recoveries</i>	<i>Page 9, Lines 22-28</i>	These lines in credit unions are typically very difficult to track and compile in some credit unions for purposes of the call report, particularly the Bankruptcy fields. The information often requires coordination of several departments in a credit union and requires judgment to determine some of the data. The burden of collecting this data seems to outweigh the usefulness of the supervisory value, particularly, since some of the information is provided on annual audited financials and can be obtained for regulatory purposes from that data. While it does need to be compiled for purposes of the audited financials, a quarterly reporting is not necessary.	Recommend moving to an annual reporting for this data (in part through the annual audited financials) or revising to reduce the burden.
<i>Liquidity, Commitments and Sources</i>	<i>Page 10, Line 4</i>	This line is often difficult to determine the amounts. Many times, the amount of the pending claim is simply a guess, therefore the supervisory value is questionable. Further the instructions are not clear as to what is expected to be reported. Finally, an amount is established in the audited financial statements which should suffice for supervisory purposes.	Recommend removing this line from the reporting and utilizing the figure provided in the annual audited financials. Alternatively, the instructions need to be revised to provide clear guidance on how to determine the amount.
<i>PCA Net Worth Calculation</i>	<i>Page 11, Line 7</i>	If there is a merger the NCUA will approve the merger and should have the information and data already.	Eliminate section as not needed and information has previously been reported.

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<i>Standard Components of Risk Based Net Worth Requirement</i>	Page 12	This will need to be redone for the RBC Rule	Rework for the RBC Rule.
<i>Schedule A – Specialized Lending</i>	Page 13, Columns of No. of Loans Granted and Amount Granted Year to Date	These columns appear to be unnecessary as you can tell whether a portfolio is growing or declining from other information.	Recommend removing these two columns.
<i>Schedule A – Specialized Lending</i>	Page 13, Lines 1-10	This information needs to be parallel and consistent with Page 2.	Recommend having this information flow into the Page 2 reporting and calibrated so that it is consistent.
<i>Schedule A – Specialized Lending</i>	Page 14, Lines 14-19	This should contain the information from Page 8.	Combine with the Page 8 information.
<i>Schedule A – Report YTD numbers</i>	Additional Column	The outstanding balance would provide more useful information as well as the unfunded commitments from Page 10	Add a column to provide outstanding balance together with moving the Page 10 unfunded commitments information here. They should all be together on one page.
<i>Schedule A – Report YTD numbers</i>	Page 15, Lines 10-12	This reporting currently creates discrepancies between the Page 10 reporting	Revise to make consistent with the Page 10 reporting so that the numbers are not out of balance. Information should be automatically fed by the detailed sections.
<i>Schedule A – Report YTD numbers</i>	Page 15 – Overall	This page should allow for a loan below the \$50,000 aggregate to be reclassified to non-MBL for purposes of reporting	Revise the instructions to allow for a loan below \$50,000 to be reclassified for reporting purposes

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<i>Schedule A – Specialized Lending</i>	Page 16, Lines 1a – 1f	The TDR information is scattered throughout the call report.	This section should be eliminated or combined with the Page 16 information.
<i>Schedule A – Specialized Lending</i>	Page 16, Line 3	This line should feed into the reporting on Page 2.	Recommend having this line automatically populate the line on Page 2.
<i>Schedule B – Investments, Supplemental Information</i>	Page 17, Line 1b	NCUA has, or should have, this information since they are NCUA Guaranteed Notes	This line should be removed.
<i>Schedule B – Investments, Supplemental Information</i>	Page 17 – Overall	Much of this information is obtained through the examination process where investments are scrutinized. It is questionable why there is separate information about mutual funds and common trusts. The three separate sections about agency mortgage-backed investments, other mortgage backed securities, and CMOs and commercial backed securities do not need to be separately reported.	Recommend eliminating this Schedule, or combining some of the reporting to a single schedule with mutually exclusive categories that avoid overlaps and call for a single total.
<i>Schedule B – Investments, Supplemental Information</i>	Page 18	The summary on Page 1 should be together.	Should be combined with other parts of the balance sheet.
<i>Schedule C – CUSO Information</i>	Page 19	This section does not need to be reported quarterly, particularly since NCUA now has the CUSO Registry. The instructions need to be clarified as to what is needed.	Either eliminate because of the CUSO registry or move to the Profile section. Clarify the instructions to provide a more robust description of what is needed.
<i>Schedule D – Derivative Transactions</i>	Pages 20-24	There are 5 pages total on Derivatives. This seems excessive for purposes of monitoring derivatives in credit unions.	Consolidate the schedule.

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<i>Schedule E – Bank Secrecy Act/Anti-Money Laundering Information</i>	Page 25	Quarterly reporting of this information appears to be excessive for supervisory purposes.	Recommend moving it to the Profile or to an annual reporting cycle.
<i>NCUA 5300 Call Report Instructions</i>	Page 14 – Assets	It is unclear what “vault funds in transit” means	Clarify that this means to/from the Fed Reserve
<i>NCUA 5300 Call Report Instructions</i>	Page 15	(c) calls for Cash on deposit and cash equivalents in the investment category. These are not investments. Further the weighted average live for PCA RBNW are reported on Item 2, Page 15.	Adjust the instructions
<i>NCUA 5300 Call Report Instructions</i>	Page 15	Money Market Funds are included on the Item 2, Page 15 instructions and are not input by maturity date	Adjust the instructions for Money Market Funds
<i>NCUA 5300 Call Report Instructions</i>	Page 15	The “*” and “**” items should be moved into the table for clarity	Move the “*” and “**” items into the table for clarity.
<i>NCUA 5300 Call Report Instructions</i>	Page 18 – Statement of Financial Condition	Instructions do not include Line of Credit and instead have them on a separate page. They more logically fit in this section.	Include Unused LOC in this section instead of on a separate page.
<i>NCUA 5300 Call Report Instructions</i>	Page 18 – Interest Rates	The most common rate is not a useful metric.	Adjust the instructions to either eliminate or change to an weighted average rate.

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<i>NCUA 5300 Call Report Instructions</i>	Page 18 – Paragraph 15	The instructions ask for the number of unsecured credit card loans which counting can vary from credit union to credit union.	Clarify that only those with a balance as of a report date or alternatively any active card even with a \$0 balance. Every credit union uses a different method to determine the number.
<i>NCUA 5300 Call Report Instructions</i>	Page 19 – Paragraph 19 and 20, Page 20 – Paragraph 20 and 24	The definition is unclear as to what is a “vehicle”, auto, passenger truck, motorcycle etc. Examiners differ on their interpretation. Also unclear what line to place an MBL secured by a vehicle.	Clarify the definition of “vehicle”. If MBLs secured by vehicles should be on Line 24, include this direction for the instructions for Lines 19 and 20.
<i>NCUA 5300 Call Report Instructions</i>	Page 20 – Paragraph 22	The instructions use different terminology to describe what appears to be the same issue: “interest on the property other than a first mortgage lien” vs. “secured by a subordinate lien”. This leads to a discrepancy in interpretations.	Use the same verbiage. Further, it would make sense to include unfunded commitments on the same page.
<i>NCUA 5300 Call Report Instructions</i>	Page 20 – Paragraph 25	This language is different from the instructions for page 1, Line 8.	The instructions should agree with the instructions for Page 1, Line 8 which indicated some loans would be reported here.
<i>NCUA 5300 Call Report Instructions</i>	Page 21 – Paragraph 27	The term “long-lived” and “sold shortly” are unclear.	Revise the instructions to provide clarity as to what constitutes “long-lived” and “sold shortly”.
<i>NCUA 5300 Call Report Instructions</i>	Page 22 – Paragraph 31	Does not address identifiable intangibles NOT obtained through a merger or business combination. i.e. Naming Rights intangible owned by some credit unions.	Revise to include non-merger related intangibles.
<i>NCUA 5300 Call Report Instructions</i>	Page 22, Paragraph 32	For other assets it makes sense to include a line item for the CUSO amount here rather than a separate schedule. Further the reference to Page 17 should be Page 19.	Amend the section to include a line item for the CUSO rather than a separate schedule. Correct the page reference error to Page 19.

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<i>NCUA 5300 Call Report Instructions</i>	Page 22, Paragraph 34	For Loans Granted Year-to-Date, the instructions of approval in a previous year are unclear. What if it is approved in a prior year, will it not count in the number of new loans granted. If approved this year but there are no advances, will it be counted in the number of loans granted?	Adjust the instructions to account for various situations.
<i>NCUA 5300 Call Report Instructions</i>	Page 23, Paragraph 36	How to count the number of loans is unclear.	Clarify whether the number includes loans with a balance, with a limit, or/and no balance.
<i>NCUA 5300 Call Report Instructions</i>	Page 24, Paragraph 3	Dollar Roll financing transactions are similar to borrowing repurchase transactions. Instructions should be expanded to include treatment of Dollar Roll financing transactions.	Clarify/include in instructions.
<i>NCUA 5300 Call Report Instructions</i>	Page 25, Shares/Deposits	“Common Rate” is not a meaningful metric.	Change to average APYE or weighted average or remove entirely.
<i>NCUA 5300 Call Report Instructions</i>	Page 26, Retail Sweep	These instructions do not reflect actual practice as they do allow retail sweeps that do not physically move funds on the member account and exist on a 3 rd party system (i.e. CETO Logic Deposit Reclassification System. This has been approved by the FRB.	Adjust the instructions to allow for actual practice.
<i>NCUA 5300 Call Report Instructions</i>	Page 27, Paragraph 11	“Club Accounts” should be clarified.	Clarify whether or not club accounts need to have auto deposit and payout features.
<i>NCUA 5300 Call Report Instructions</i>	Page 28, Paragraph 25	Instruction is way too long and repeats the regulation.	Shorten the instructions to read “input \$ amount of HAS’s held at the credit union”. Remove the regulation.

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<i>NCUA 5300 Call Report Instructions</i>	Page 29, Paragraph 27	The instruction on IRA/Keogh Accounts need to be clarified to clarify the term “accounts”. One member account with multiple sub IRA CD’s is considered 1 IRA account for IRS reporting, but if a member has two member accounts and each has an IRA then they are considered 2 IRA accounts.	Clarify the term “accounts”.
<i>NCUA 5300 Call Report Instructions</i>	Page 29, Paragraph 29	The term “shares” needs to be clarified to elaborate in what is included (regular shares or other shares such as CDs).	Clarify the definition of what is included in the term “shares”
<i>NCUA 5300 Call Report Instructions</i>	Page 34, Paragraph 1	Interest earned on Loans Held for Sale are not reported in the “Interest Income” section. It is reported as interest income for financial statement reporting. For Call Report reporting, it is reported on Line 13.	Include a line item for interest on Loans Held for Sale in the Interest Income section.
<i>NCUA 5300 Call Report Instructions</i>	Page 34, Paragraph 2	The definition should include a breakout to identify interest refunded as part of a rebate program or bonus.	Revise the instructions to allow for reporting of interest as part of a program or bonus.
<i>NCUA 5300 Call Report Instructions</i>	Page 34, Paragraph 3	Clarify whether income on loans held for sale is included.	Revise the instructions to account for loans held for sale.
<i>NCUA 5300 Call Report Instructions</i>	Page 34, Paragraphs 6 and/or 7	Credit unions with dividend/interest member reward programs will have additional dividend expense that may skew normal dividend expense.	Include a line item to report dividend/interest expense for member reward programs.
<i>NCUA 5300 Call Report Instructions</i>	Page 34, Paragraphs 6 through 8	Credit unions with hedging strategies to mitigate balance sheet risk may have inflated interest expense.	Include a separate line item to report interest expense due to hedging activities.

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<i>NCUA 5300 Call Report Instructions</i>	Page 35, Line 12	The language that “Associated expenses should be reported in the expense section” should be bolded and also repeated in the expense section so that it is clearer to credit unions. This area is sometimes confusing or overlooked by credit unions.	Make instructions more evident in this section and the corresponding expense section.
<i>NCUA 5300 Call Report Instructions</i>	Page 36-37, Lines 20-31	All of these items need greater clarification as to what needs to be included on each item.	Provide greater clarity as to what needs to be included in each numerated item.
<i>NCUA 5300 Call Report Instructions</i>	Page 36, Paragraph 24	Instructions need to be clarified to include marketing and member education	Revise the instructions to clarify member education expenses.
<i>NCUA 5300 Call Report Instructions</i>	Page 37, Paragraph 29	For adjustments to maintain held for sale foreclosed and repossesses, these are considered gains (loss) on disposition of fixed asset, Line 16 per GAAP. This should be revised. Further it is unclear where expenses to maintain foreclosed property (OREO, such as utilities, property taxes, etc.) should be reported. Should they be included here or elsewhere?	Revise the instructions to clarify expenses that should be included.
<i>NCUA 5300 Call Report Instructions</i>	Page 38, Paragraphs 2 and 3	Clarify if number of current members should include non-person members (i.e. business, corporations, trusts, etc.).	Provide clear definition of “member.”
<i>NCUA 5300 Call Report Instructions</i>	Page 38, Paragraph 7	While this reporting should be eliminated from the call report, the instructions should clarify whether active users include active or registered. If active, then a timeline should be provided (i.e. within the last 3 months).	Remove the reporting, or revise to provide clarity on what constitutes a member utilizing the website.
<i>NCUA 5300 Call Report Instructions</i>	Page 39, Paragraph 12	The instructions call for consumer members yet examiners vary on whether wires for business members are included in the count.	Clarify what needs to be included as a “consumer member” for purposes of counting remittance transfers.

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<i>NCUA 5300 Call Report Instructions</i>	Page 40, Definition of "TDR"	The definition of "Troubled Debt Restructuring" does not need to be in the instructions.	Remove the definition.
<i>NCUA 5300 Call Report Instructions</i>	Pages 42 – 44 – Delinquent Loans by Collateral Types	The instructions for the Number and the Amount should be combined into one section. In other words, delete 1b through 10b and revise the instructions to be the "Total Number and Amount of Delinquent Loans by Collateral Type".	Combine the "Number" and "Amount" sections into a single "Number and Amount" section.
<i>NCUA 5300 Call Report Instructions</i>	Pages 45 – 48 - Additional Delinquency Information	The instructions for Delinquent Numbers and the Amount should be combined into one section. In other words, delete 11b through 27b and revise the instructions to be "Report Delinquent Numbers and Amount Only". Include the Section and Page # for easy reference. Further for paragraph 22a clarify that only business loans with a 1 st lien position are included. For 23a, clarify whether only consumer or any lien position. For 24a, clarify whether only business loans or subordinate liens.	Combine the "Number" and "Amount" sections into a single section, and other clarifying instructions.
<i>NCUA 5300 Call Report Instructions</i>	Page 49 – 53 – Loan Charge Offs and Recoveries	This underlying section should be broken out into more detail versus reporting this in multiple places (Lines 11-26). The phrase "loans charged off year-to-date in the left column and the dollar amount of recoveries year-to-date in the right column" is repeated numerous times in the instructions, it does not need to be repeated. Paragraphs 6, 7, 14, 22, 23 should be amended to clarify if business loans are included and include references to page numbers.	Revise this form to consolidate instructions and clarify various lines on business loans.
<i>NCUA 5300 Call Report Instructions</i>	Page 52, Paragraph 31	Revise the instructions to reflect that the NCUA approved ceiling is 18%. This reporting is not relevant.	Remove this line and instruction.
<i>NCUA 5300 Call Report Instructions</i>	Page 54, Paragraph 1B	Need to clarify that the reporting includes credit cards for business purpose accounts.	Revise the instructions to clarify that credit cards for business purpose accounts are included.

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<i>NCUA 5300 Call Report Instructions</i>	Page 55, Paragraph 1	This page needs a page number reference.	Add in a page number reference on the instructions.
<i>NCUA 5300 Call Report Instructions</i>	Page 56, Paragraph 2C	It is not clear whether all Outstanding Letters of Credit should be reported, or just those meeting the NCUA definition of a Member Business Loan.	Clarify instructions to better define whether Outstanding Letters of Credit should meet NCUA's MBL definition.
<i>NCUA 5300 Call Report Instructions</i>	Page 56, Paragraph 3A	Instructions need to be revised to clarify that 2 nd Lien residential construction lines are included.	Revise the instructions to clarify that 2 nd Lien residential constructions lines are included.
<i>NCUA 5300 Call Report Instructions</i>	Page 56, Paragraph 3B	Need to revise "individuals for household, family, and other personal expenditures" to read "consumers".	Revise to replace phrase with "consumers".
<i>NCUA 5300 Call Report Instructions</i>	Page 57, Paragraphs H & I	References are incorrect, "2A-G" should be 3A-G, 2A-H should be 3A-H.	Correct References.
<i>NCUA 5300 Call Report Instructions</i>	Page 58, Paragraphs 9 and 10	9A-D and 10 A-G, it is unclear why those are not the same.	Revise to make consistent and Clarify instructions for Line 10 to include "outstanding borrowings" in each of these categories.
<i>NCUA 5300 Call Report Instructions</i>	Page 59, Paragraph 7	The instructions call for reporting of a business combination after January 1, 2009. It is unclear why this would need to be reported and tracked for so many years. It would be more logical to enter year to date information each quarter and NCUA can extrapolate QTD information by comparison to prior 5300 reports.	Revise or remove this reporting.

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<i>NCUA 5300 Call Report Instructions</i>	Page 62, Section 1	Examiners often give differing interpretations on this item in particular that outsources mortgage loans need to be included in indirect loans.	Clarify guidance on the inclusion of mortgage loans in this section.
<i>NCUA 5300 Call Report Instructions</i>	Page 62, Paragraphs 7 & 8	These paragraphs call for loans not eligible for additional advances for closed end and those eligible for additional advances under open end. This is not easy to separate those past their draw period versus those in a draw period. They can all be included in 8 and most examiners do not question this.	Revise to allow for flexibility.
<i>NCUA 5300 Call Report Instructions</i>	Page 63, Paragraphs 11 and 12	The sentence commencing with “A payment option mortgage...” is repeated twice for the paragraphs. Move it to the beginning of the section and don’t repeat it twice. Also, the language needs to use consistent terminology (lien vs. first deed of trust).	Revise to shorten and make terms consistent.
<i>NCUA 5300 Call Report Instructions</i>	Page 64, Paragraph 14	This can be moved to Page 2, Line 26 area.	Move section to Page 2, Line 26 area.
<i>NCUA 5300 Call Report Instructions</i>	Page 66, Paragraph 5a-g	This instruction (the bold and underlined portion) is confusing. It should be spelled out: 5c. Real Estate – Consumer Only d. Business Loans (excluding C & D) – all business except C & D f. Commercial C & d – Business C & D	Revise to spell out the instructions.
<i>NCUA 5300 Call Report Instructions</i>	Page 68	The instructions do not allow for readjustment for a business loan once it no longer qualifies as a business loan. The amount of work to leave them as an MBL and to manually adjust for loans under \$50K is labor intensive and subject to errors.	The instructions should be adjusted to allow for reclassification when the loan no longer qualifies as an MBL.
<i>NCUA 5300 Call Report Instructions</i>	Page 68, Paragraphs 1 & 2	The term number needs to be clarified as to whether it includes a loan with a balance or a limit and no balance. This needs to be defined as it is different than what is reported in other sections	Clarify the definition of “number”.

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		where only a number with a balance is reported. Some examiners have clarified this during exams.	
<i>NCUA 5300 Call Report Instructions</i>	Page 72, Paragraph 9	The language states it must include the “portion of loan balances”, this should be clarified as any loan meeting exemption listed on Page 67, Section 4 is not classified or tracked as a commercial MBL. Further the bulleted section should be clarified for situations where a loan is only partially secured. Fully secured are specifically exempt on Page 67, section 4	Revise the instructions to clarify the various situations.
<i>NCUA 5300 Call Report Instructions</i>	Page 72, Paragraphs 10	If loans no longer qualify as MBL or have a guarantee amount by the government, they should not be included for RBNW calculation. This distorts the calculation and would lower the ratio of these loans were not included.	Revise the instructions to remove loans that no longer qualify as an MBL or have a guarantee by the government.
<i>NCUA 5300 Call Report Instructions</i>	Page 73, Paragraph 1c	We recommend creating two lines 1c – 1 st Mortgage Business and 1d – Other RE Business and not include them in 1a & 1b. Then there would be a number that could be verified and the NCUA can add them all together if needed.	Revise to break out the reporting.
<i>NCUA 5300 Call Report Instructions</i>	Page 74, Paragraph 3	This should be moved to Page 2, Line 26 area.	Revise to move to Page 2, Line 26 area.
<i>NCUA 5300 Call Report Instructions</i>	Pages 75-77	The instructions on PCILS are often difficult to understand and interpret what needs to be included. Further this section will need to be revised for the pending FASB/CECL changes.	Instructions need to be clarified as to what needs to be included for PCILS.
<i>NCUA 5300 Call Report Instructions</i>	Page 75, Paragraphs 1a – 1e	The instructions beginning with “Report the number and dollar....” Is repeated in the next 5 paragraphs. It should just be put as an initial instruction. This would remove about a page of language.	Remove the repeated instructions.

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<i>NCUA 5300 Call Report Instructions</i>	Page 77	This whole page combined with page one by adding more rows (non-duplicated to the current table)	Combine the pages.
<i>NCUA 5300 Call Report Instructions</i>	Page 77, Paragraphs 1a-b	NCUA should already have this information and so it would appear to be redundant.	Remove this reporting and instructions.
<i>NCUA 5300 Call Report Instructions</i>	Page 79, Paragraph 8	It is unclear what this section is used for by the NCUA and is time intensive to break down investments in yet another way. It should be removed.	Remove this section.
<i>NCUA 5300 Call Report Instructions</i>	Page 81, Paragraph 19	It is unclear why this reporting is needed. It should be removed.	Remove this section.
<i>NCUA 5300 Call Report Instructions</i>	Page 82, Paragraph 20 (a-b)	Needs to be clarified what is meant by these terms. Stocks, REIT, etc.)	Clarify what should be included in this reporting.
<i>NCUA 5300 Call Report Instructions</i>	Pages 83 - 84 – Aggregate of Financial Interest the Credit Union Has in a CUSO	This should be moved to Page 2. Recommend separating business loans from this line so C is a total of A & B. Account 852 is already included in A.	Revise to simplify this reporting.
<i>NCUA 5300 Call Report Instructions</i>	Page 84 – Wholly Owned CUSOs	This should be moved to the Profile.	Move reporting to the Profile.

Call Report Schedule:	Page/Line #:	Problem:	Solution:
<i>NCUA 5300 Call Report Instructions</i>	Pages 86-103	Credit unions that originate mortgage loans often engage in selling loans on the secondary market. This activity is reported in the lending sections of the Call Report. The related IRLC and FLSC derivative activity is normal and does not require special NCUA permission to engage in these derivatives. In addition, they are exempt from the threshold measurements and regulatory reporting related to derivative exposure.	Omit IRLC and FLSC from Schedule D reporting.
<i>CU Online System</i>		As recommended by NCUA, some credit unions have an internal QA review of the Call Report prior to submission to NCUA. We would like to give these folks access to CU Online without having the ability to make changes.	Create a role for view-only in CU Online.