

**From:** Doug Wadsworth  
**To:** Call Report Modernization  
**Subject:** Call Report Simplification Feedback  
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## Call Report Simplification Suggestions

Of course Credit Unions use different data processors, so the more labor intensive data to retrieve from my system for the call report format, may not be the same as other Credit Unions, but following are some of the most exhausting parts, or just little parts that seem unnecessary, and slow down the overall process. I am a \$30M asset credit union with only 10 employees from Region 5 of the NCUA, so this may best represent other small Credit Unions like me. Thank you for making an effort to simplify the 5300 call report, time is so valuable and I would rather spend it trying to help our members.

**Page 0: Certification:** Why do you have two fields for the name, one for the first name, another for the last name? It might “feel” more official, but it doesn’t make anything more secure, and just makes it take longer. How about a single field where you can type your entire name.

**Page 3: #29:** Dollar Amount of business Share accounts. This doesn’t really designate just share accounts, or also share draft accounts (checking)? It is very difficult to separate out different types, like removing trust accounts, I have to export the entire list of all different business accounts, then manually delete all the trust accounts (I have to read each business name to find them), then delete the checking accounts, certificates, etc. How about you just request: “All funds in any type of business account, including money markets, CDs, checking, etc.” Either that or specify – do you just want share savings accounts only?

**Page 7, Delinquent Loans by Collateral Type:** Perhaps you can stop requesting the delinquent loans from 30-59 days, since they are not supposed to be “reportable” anyway? This is the “largest” list of delinquent loans, and so requires the most sorting and counting.

**Page 8: Additional Delinquency Information:** This is one of the most time consuming pages, just due to how my data processor present the data. I have to manually add up each individual indirect loan dollar physically from a PDF (I can’t export it to a spreadsheet).

First of all, can we remove the 30-59 day part, again, since it isn’t supposed to be reportable. Even better, perhaps we can just lump these into page 7, instead of making an entire page for these loans. Some of this info is already being reported on Page 13 #1, can that just be sufficient?

**Page 9:**

**#29:** It is hard to calculate the “current balance of loans subject to bankruptcies that only happened in the current YTD.” Seriously, that is really hard, and is this info really very useful for anything? I have to filter out only the BKs from the current year, and then figure

out the current loan balance of each, then add them up. This means I have to physically open each and every one of these accounts myself, and see what the balance was on the last day of the quarter, and then manually add them up. There is no simple and easy way to make this kind of information automatic from my data processor, because it is regarding only current YTD BKs with current balances.

#31: It is labor intensive to calculate how many loans exceed 15%, and what the average rate. It requires yet another manual exporting of data to a spreadsheet, and then sorting, and then calculating an average and total.

**Page 10: #3D (overdraft protection program commitments).** This is a useless number which is hard to calculate, because we have a policy that limits it to a percentage of what is available. Does the NCUA really use this number for anything that is actionable or informative in a useful way?

**Page 13: Section 2:** This page takes me hours to complete, and dozens of different sorting strategies in Excel. If I had designed my loan products (and assigned them loan type codes) with the 5300 call report categories in mind, it would have been much easier. This is complicated because we have several unique types of mortgages, with special "rate call" clauses.

**Page 14: #17.** This is an incredibly complicated number to calculate, because of all the different types of mortgages we have that include a 7 year rate call clause, and because some people are paying down the loans faster than the term (double payments), and because we also have HELOCs with variable rate clauses and 5 year draw periods. This requires a very manual process or sorting multiple spreadsheets of multiple different RE loan types, and then adding them all up together. If this number wasn't incredibly useful for the NCUA, it would be great if you eliminated it.

**Page 16: TDR.** I recognize that the NCUA was concerned that the numbers and ratios could potentially be "padded" by Credit Unions modifying and restructuring delinquent loans... however the regulatory burden required to do help members in this way (require to track them all, total them all, report them on the 5300) was so burdensome that instead our Credit Union decided it wasn't worth the time or effort. Sometimes a member quits paying and we charge off the loan, then a year later they decide they want to pay us back, so we offer them a zero percent interest rate loan to pay off the already charged off amount (to reward them for showing such good character). So the NCUA decided that even those are modified loans (even though the original loan was long since charged off), so we would have to report those too. So instead (to save the time and money wasted on tracking and reporting these), we just don't offer them to members at all anymore. We only did these extremely rarely anyway, like maybe on one loan per year. So your complicated regulations and reporting requirement has resulted in fewer valuable services we are offering for our members. Honestly, did the NCUA get any value out of this entire page throughout the recession? Was the value of all these calculations and thousands of new policies and wasted hours return any real value to anyone? Please, just delete this entire page, and redact all the complicated policies required for helping members restructure loans. It will allow Credit Unions to help struggling members restructure their loans, without the credit union being "punished" with complicated policies to follow and tracking and reporting requirements.

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