

# NCUA LETTER TO CREDIT UNIONS

NATIONAL CREDIT UNION ADMINISTRATION  
1775 Duke Street, Alexandria, VA 22314

**DATE:** May 2016 **LETTER NO:** 16-CU-04

**TO:** Federally Insured Credit Unions

**SUBJ:** Member Account Deposit Reconciliation Practices

**ENCL:** [Interagency Guidance on Member Account Deposit Reconciliation Practices](#)

Dear Board of Directors and Chief Executive Officer:

NCUA, together with four other federal financial regulatory agencies, issued the enclosed guidance to address discrepancies that may occur with amounts deposited by a member or customer and the dollar amount credited to that account. The “Interagency Guidance Regarding Deposit Reconciliation Practices” discusses consumer protection laws applicable to deposits, including the Expedited Funds Availability Act (as implemented by Regulation CC), the Federal Trade Commission Act, and the Dodd-Frank Wall Street Reform and Consumer Protection Act, and that violations could occur if “credit discrepancies” are permitted or are not resolved in a timely manner. The guidance does not mandate specific practices. However, it does emphasize the need to reconcile variances resulting from encoding errors, poor image capture, and other issues.

We encourage you to review your policies and practices to address discrepancies between amounts presented by members for deposit and the actual amount credited to the member’s account. We expect credit unions to design and manage their deposit reconciliation practices to comply with Regulation CC and other applicable laws or regulations as part of maintaining robust compliance management systems.

If you have any questions about deposit reconciliation issues, you may contact your NCUA regional office or state supervisory authority.

Sincerely,

/s/

Rick Metsger  
Chairman

Enclosure