



7535-01-U

NATIONAL CREDIT UNION ADMINISTRATION

Electronic Loan, Deposit, and Investment Data Collection

AGENCY: National Credit Union Administration (NCUA).

ACTION: Request for Information (RFI)

SUMMARY: The National Credit Union Administration is conducting a comprehensive review of the loan, deposit, and investment information collected electronically during examinations of federally insured credit unions from the core data processing and offline systems used by credit unions.

DATES: Comments must be received on or before [INSERT DATE THAT IS 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].

ADDRESSES: Comments may be submitted using *one* of the methods below (Please do not send comments via multiple methods). Include [Your name and company name (if any)] – Electronic Data Collection Modernization in all correspondence.

- E-mail: Address to BIMail@NCUA.gov. Include “[Your name] Comments on Electronic Data Collection Modernization” in the e-mail subject line. Any of the following formats is acceptable: HTML, ASCII, Word, RTF, or PDF.

- Mail: Please direct written comments to Amber Gravius, National Credit Union Administration, 1775 Duke Street, Alexandria, Virginia 22314.

NCUA will post all comments received by the deadline on the agency web site (*www.ncua.gov*) without alteration or redaction, so commenters should not include information they do not wish public (e.g., personal or confidential business information). SPAM or marketing materials will be discarded without publication.

FOR FURTHER INFORMATION CONTACT: Kelly Lay, Business Innovation Director or Amber Gravius, Special Assistant for Business Innovation, Office of the Executive Director, at 1775 Duke Street, Alexandria, VA 22314 or telephone (703) 518-6313 (Ms. Lay) or (703) 548-2411 (Ms. Gravius). Media inquiries should be directed to the NCUA Office of Public and Congressional Affairs at (703) 518-6671 or pacamail@ncua.gov.

SUPPLEMENTARY INFORMATION: The National Credit Union Administration (NCUA) is conducting a comprehensive review of the loan, deposit, and investment information collected electronically during examinations of federally insured credit unions (FICUs). The overarching goal is to modernize, formalize, and standardize data formats collected during examinations from the core data processing and offline systems¹ used by credit unions. The purpose of this modernization effort is to:

- a. Achieve a more consistent examination process;
- b. Promote agency efficiencies and reduce burden on credit unions;

¹ Offline systems is defined as other IT systems not connected or linked to the core data processing system or third party vendors with loan, deposit, and investment data. These may include, but are not limited to, credit cards, mortgage loans, student loans, indirect loans, etc.

- c. Reduce onsite time by streamlining agency efforts to sort, organize, and format data;
- d. Improve data reliability and quality to enable more offsite work;
- e. Enhance the objectivity of examination conclusions with a more thorough and advanced portfolio analysis; and
- f. Support the Exam Flexibility Initiative's² longer examination cycle, consistency between examiners, better communication, more efficient examination planning process, and better offsite monitoring tools.

This RFI is a major step in NCUA's internal modernization efforts. After considerable research and analysis, the agency is now at a point where it can outline the scope of its planned improvements. In turn, NCUA seeks the views of the public on this initiative and is eager to gain input from interested stakeholders on a number of aspects related to the future data collection by NCUA. Specifically, this RFI explains NCUA's objectives and seeks insights from stakeholders in identifying the interrelated considerations and challenges that could arise if NCUA adopts a new standardized data format for loan, deposit, and investment data.³ NCUA will use information furnished by stakeholders to help further define data fields to collect electronically, develop a standard data format (including field names and definitions), and comprise an implementation strategy that reduces burden without compromising the agency's ability to safeguard the National Credit Union Share Insurance Fund (NCUSIF).

² <https://www.ncua.gov/About/Documents/exam-flexibility/exam-flexibility-initiative-report-2016-oct.pdf>

³ A standard data format will not replace or eliminate all examiner data requests occurring during an examination. NCUA encourages responders to recommend other data sources that NCUA could standardize to improve exam efficiency.

Separate and apart from the normal examination data download process, FICUs with assets greater than \$10B must comply with 12 CFR 702, subpart E which implements capital planning and stress testing.⁴ The information collected as part of this process is not the focus of this RFI as it differs significantly in timing, purpose, and content.

In addition to this RFI, the agency may seek clearance from the Office of Management and Budget to conduct stakeholder calls and form workgroups to gather additional information about barriers and benefits to this modernization initiative. NCUA invites interested parties to respond generally to this modernization initiative and specifically to the questions included in this RFI.

I. Background

Examiners obtain electronic data at the beginning of every examination, during some supervision contacts, and on an ad hoc basis from credit unions. This raw data, sometimes from multiple sources and in multiple data files, provides examiners with essential information in evaluating credit and deposit risks in FICUs and is integral to risk supervision which is central to safeguarding the integrity of the NCUSIF. Before 1995, this data was in written format. In 1995, NCUA initiated the first electronic data collection⁵ encouraging FICUs to provide member data to examiners through standard download routines made available by their information processing vendor or written in-house instead of paper listings and reports. In this letter, NCUA requested 12 member profile, 24 loan and 4 share fields electronically for each member record.⁶

⁴ Implemented in 2014, NCUA's Office of National Examination and Supervision (ONES) collects detailed loan level data and select share data to run stress test scenarios and loan portfolio analytics for supervisory purpose. Currently, these credit unions send monthly data to NCUA on a quarterly basis using standard templates with 191 unique data fields relevant to each data type including automobile, credit cards, student, real estate, member business loans, and other consumer loans. The sample formats in this RFI include 53 similar fields to those collected by ONES.

⁵ NCUA Letter to Credit Unions Number 179, (September 1995).

⁶ The download file for both loans and shares include the 12 member profile fields.

In November 2000, NCUA encouraged adherence to the share and loan data record layout specifications to facilitate the import functions into NCUA's examination software, Automated Integrated Regulatory Examination System (AIRES).⁷ NCUA did not increase the electronic data fields or modify the data format with this communication.

NCUA last changed the loan and share download in April 2003.⁸ Beginning June 30, 2003, the member profile fields were consolidated and one new field was added for a total of eight fields.⁹ The unique loan fields increased by eight and the unique share fields increased by nine to total 39 loan and 20 share data fields in the electronic download. Although NCUA did not make electronic data collection a requirement, NCUA did identify fields as "critical" and "optional." NCUA requested FICUs provide all critical fields for successful import and use in the examination process. The letter identifies 15 critical fields in the share file and 25 critical fields in the loan file.

In 2009, NCUA informed federal credit unions (FCUs) of the membership data collection and information extracted from the electronic loan and share download gathered during examinations.¹⁰ NCUA did not increase the electronic data fields or modify the data format with this communication.

⁷ NCUA Letter to Credit Unions 00-CU-09 (November 2000).

⁸ NCUA Letter to Credit Unions 03-CU-05 (April 2003).

⁹ NCUA combined the member name, first name, last name, and middle initial into one field. Additionally, the zip code fields were consolidated and social security number was added to the share download resulting in the number of unique member profile fields to decline from 12 to 8. The member profile fields are currently included in each loan and each share download.

¹⁰ NCUA Letter to Federal Credit Unions 09-FCU-03 (January 2009).

II. Reason for Modernization Initiative

The credit union industry is dynamic, with FICUs growing larger and more complex each year.

NCUA must ensure its data collection vehicles evolve with industry practices and examination/supervision procedures so:

- a. all material FICU risk exposures are captured;
- b. data offering little insight into these exposures are no longer solicited; and
- c. the reporting burden on supervised institutions – particularly small or non-complex credit unions – is minimized.

Increasing industry complexity, a desire for more effective offsite supervision, and evolving technologies necessitated a review of the current process in favor of opportunities to improve efficiencies and reduce the examination burden on credit unions. Table 1 illustrates the evolution of the FICU industry since NCUA last changed the electronic data collection in April 2003. Although the number of institutions has declined, FICUs continue to grow in assets, loans, shares, membership, and complexity.

Table 1: FICU Trends Since the Last Change in Electronic Data Collection

	12/31/2003	3/31/2017	% Change
# FICUs	9,369	5,737	(63.33%)
Total Assets	\$610.16B	\$1.34T	119.62%
Total Loans	\$376.11B	\$884.58B	135.20%
Consumer Loans ¹¹	\$187.53B	\$390.07B	108.00%
Credit Card Loans	\$21.84B	\$51.59B	136.21%
Indirect Loans	Not collected ¹²	\$172.56B	Not available
Participation Loans	\$4.5B	\$29.97B	566.00%
Real Estate Loans ¹³	\$168.26B	\$438.93B	160.86%
Commercial/MBL	\$9.32B	\$68.89B	639.16%
Student Loans ¹⁴	Not collected	\$3.99B	Not available
Total Shares	\$528.34B	\$1.13T	113.88%
Average Assets	\$65.10M	\$233.0M	257.91%
Median Assets	\$10.55M	\$29.97M	184.08%
# Loans	40.92M	61.01M	49.10%
# Shares Accounts	142.34M	204.44M	43.63%

Today, examiners frequently request additional reports and data electronically during examinations above and beyond the loan and share download including, but not limited to: investment data, credit cards, indirect loans, participation loans, and commercial/member business loans. These requests are compelled by increased complexity, more services, and extensive loan products offered to credit union members. These requests may be made before an examination begins or throughout the process. As NCUA has not defined a standard data

¹¹ Includes unsecured loans, lines of credit, vehicle loans, short-term, small dollar amount loans, and leases receivable. This number may include some overlap with indirect, participation, and commercial/MBLs based on categories of reporting on the 5300 Call Report.

¹² The December 31, 2003 5300 Call Report only collected Indirect Loans Granted Year-To-Date. NCUA first started collecting total outstanding indirect loans with the March 31, 2014 Call Report. Credit unions reported a total of \$97.35B indirect loans as of March 31, 2014. Since that initial reporting, indirect loans have increased 77.3%.

¹³ Total real estate loans includes commercial/MBLs secured by real estate.

¹⁴ Non-federally guaranteed student loans as reported on the 5300 Call Report. NCUA first started collecting this information with the March 31, 2014 Call Report. Credit unions reported a total of \$2.84B non-federally guaranteed student loans as of March 31, 2014. Since that initial reporting, these loans have increased 40.49%.

structure and fields for different loan types,¹⁵ the characteristics of data presented in these files often differs from credit union to credit union and vendor to vendor. The unique formats can result in credit union resources to produce and explain their individual reports to examiners. This also creates examination inefficiencies for credit unions and examiners as the reports may not contain all information requested by the examiner and additional information requests may be made. Further, data limitations and inconsistency results in disparate evaluations of risk at different credit unions and across all FICUs.

As part of the broader enterprise modernization effort, NCUA desires to improve loan and deposit portfolio analytics used during FICU examinations to provide for more consistent analysis of risk within and across institutions to mitigate losses to the NCUSIF. Data standardization is paramount to effectively use more robust analytic tools and will also benefit credit unions outside of the examination context, as credit unions have been known to use the download when two credit unions are merging to transfer records. It has also been used with some third party vendors for analytics, reporting, and data processing conversions.

NCUA acknowledges there are challenges with a standard data format. Credit unions use dozens of data processing systems and third party vendors for originating, recording, and monitoring loans, deposits, and investments. Additionally, there are many variations and platforms, including credit union developed information technology systems, with varying data content and formats. Responses to the questions in this RFI will inform NCUA of the extent to which

¹⁵ Most credit unions must obtain reports from other systems and third party vendors for real estate, commercial/member business loans, student loans, credit cards, participation, and indirect loans. Examiners primarily receive consumer and real estate loan information in the current loan and share download limited to the data fields defined in NCUA Letter to Credit Unions 03-CU-05.

FICUs can provide data electronically in a standard format and identify data fields available for electronic collection. Additionally, NCUA welcomes suggested implementation strategies that reduce burden without compromising the agency's ability to safeguard the NCUSIF.

III. Information Security

NCUA exercises great care in protecting sensitive and personally identifiable information. As a federal agency, NCUA must comply with mandatory security standards for federal information and information systems¹⁶ and must meet these minimum information security requirements by using security and privacy controls recommended by the National Institute of Standards and Technology (NIST).¹⁷ In addition to NIST standards and guidelines, NCUA is subject to federal statutes such as the Federal Information Security Modernization Act (FISMA) of 2014, the E-Government Act of 2002, the Privacy Act of 1974 and various OMB policies and guidance concerning federal information management, FISMA reporting, and privacy.

NCUA uses administrative, technical, and physical controls, including but not limited to: periodic review and authorization of information systems; proactive threat assessment and continuous monitoring; and annual general and role-based security training for employees and contractors. We also leverage independent tests and evaluations from other government agencies and third-party assessors.

¹⁶ FIPS Publication 199, *Standards for Security Categorization of Federal Information and Information Systems*; FIPS Publication 200, *Minimum Security Requirements for Federal Information and Information Systems*.

¹⁷ NIST Special Publication 800-53 (Rev. 4), *Security and Privacy Controls for Federal Information Systems and Organizations*.

The Office of the Inspector General (OIG) conducts independent audits, investigations and other activities to verify NCUA's compliance with applicable standards, laws and regulations related to privacy and information security and keeps the NCUA Board and U.S. Congress fully and currently informed of their work. The OIG conducts a FISMA and Federal Managers' Financial Integrity Act (FMFIA) audit annually to ensure NCUA has effectively implemented all appropriate security and privacy controls.¹⁸

REQUEST FOR COMMENT: NCUA is providing questions about major aspects of this electronic data modernization to target issues the public would like addressed by the effort. The questions are not intended to limit discussion. Indeed, responders may explore an issue relevant to this initiative.

Responses containing references to studies, research, or data not widely available to the public should include copies of referenced materials. A description of the commenter's organization and its interest in the electronic data will help NCUA use the input provided.

a. Electronic Data Collection Modernization Questions

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? What other data fields could be provided that NCUA should consider collecting electronically?
2. For electronic data, what file formats (e.g., Microsoft Excel, CSV, etc.) are available?

¹⁸ The results of these audits are reported both internally and externally to ensure completion of all remedial findings. Credit Unions and their members can review OIG Audit Reports, Semiannual Reports and Letter to Congress at <https://www.ncua.gov/About/Pages/inspector-general/reports.aspx>.

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)?
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)?
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?
6. What are the technological challenges NCUA should consider with a standardized data format (e.g., specific file names, format, etc.)?
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.)?
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?¹⁹

¹⁹ NCUA is modernizing our examination platform and analytics. The new data format will be used with these technological advancements. Until the current systems that use the existing download are retired, examiners will need the current download file as existing tools may not be able to accommodate a new download data format.

9. Should NCUA eliminate the “critical” and “optional” data categorizations discussed in NCUA Letter to Credit Unions 03-CU-05? If yes, what approaches would you propose NCUA use to collect standardized data for better analytics and examination efficiencies?
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?
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? How should NCUA ensure FICUs use the standard data format?
12. What specific information security controls or assurances are expected from NCUA to reasonably safeguard the electronic loan, share, and investment data?

Commenters are also encouraged to discuss any other relevant issues they believe NCUA should consider with respect to the electronic collection of loan, deposit, and investment data.

b. Sample Loan, Deposit, and Investment Electronic Data Collection

NCUA is requesting input and feedback on sample data fields and the associated format.²⁰ The information in tables 2 - 9 is preliminary and is presented for discussion and input purposes only.

For sample purposes only, NCUA is presenting one data format for all deposit types, one for

²⁰ These data formats include 9 member profile, 18 deposit, 120 loan, and 12 investment unique data files. They include all data fields listed in Letter to Credit Unions 03-CU-05, except three data fields that would be overlapping with new data fields – Date of Last Activity, Last Activity Code, and Credit Limit at origination.

investment data,²¹ and different data formats for loans based on the loan type.²² To the extent the FICU offers these loan and deposit services and has these investment instruments, NCUA is asking stakeholders to identify if FICUs can provide these and other data fields electronically in their response to the RFI. Similar to the download process today, credit unions would be permitted to submit multiple data files electronically for loans, deposits, and investments.

Table 2: Deposit Electronic Fields

#	Applies To	Field	Description	Example	Data Format	Current NCUA Standard Field ²³
D1	All Share Accounts	Effective date of the download	Effective date of the data.	03312017	Date	No
D2	All Share Accounts	Record Code	Indicate D for Deposits, L for Loans, I for Investment.	D	D/L/I	Yes*
D3	All Share Accounts	Taxpayer ID	Nine digit code used by the US Government (TIN). For individuals use social security number.	123456789	Number	Yes*
D4	All Share Accounts	Member ID	Primary key identifier for the entity. This is the number used to uniquely identify the member/non-member such as an account number.	ABC123456	Text	Yes*
D5	All Share Accounts	Member Name	Full legal name. Format: Last Name, Suffix (if applicable), First Name, Middle Initial for individuals. For business provide full legal name.	Long Sr., John, S.	Text	Yes*
D6	All Share Accounts	Address Line 1	Street address.	7247 Circle Sun	Text	Yes*
D7	All Share Accounts	Address Line 2	Address line 2.	PO Box 858	Text	Yes
D8	All Share Accounts	City	City where borrower resides. For business account, provide the city of the main or head office.	Fairfax	Text	Yes*
D9	All Share Accounts	State	Post office state code where borrower resides. For business accounts, provide the state of the main or head office.	NM	Text	Yes*

²¹ As of March 31, 2017, FICUs reported the following investments: Securities: 40.9% of all FICUs; Non-negotiable CDs: 83.7%.

²² Loan types include consumer, indirect, participations, residential real estate, student loans, and commercial/member business loans. As of March 31, 2017, FICUs reported the following loan services: Consumer: 100% of FICUs; Indirect: 33.1%; Participation: 27.2%; Real estate: 75.6%; Non-guaranteed federal student Loans: 12.1%; Commercial/MBL: 37.9%.

²³ Identifies fields requested in NCUA Letter to Credit Unions 03-CU-05 (April 2003). Fields identified with an asterisk (*) are categorized as “critical” fields by NCUA in Letter to Credit Unions 03-CU-05.

#	Applies To	Field	Description	Example	Data Format	Current NCUA Standard Field ²³
D10	All Share Accounts	Zip Code	Zip code where borrower resides. For business accounts, provide the zip code of the main or head office.	80521	Number	Yes*
D11	All Share Accounts	Insiders and Employees	If data supports, report "D" for directors, supervisory committee, and credit committee members, "O" for executive officers, and "E" for employees who are not executive officers. If the CEO is also the Board Treasurer, report as an executive officer - "O". If the credit union or vendor data does not support this scheme, simply identify insider status with Y/N.	E	Text	Yes
D12	All Share Accounts	Non-member	Indicator to identify non-member share accounts.	Y	Y/N	No
D13	All Share Accounts	Share Balance	Current balance of the share account, signed with two decimal places.	156.45	Number	Yes*
D14	All Share Accounts	Share Type Code	System code to identify certificates, regular, draft, IRA, money market and other share deposit accounts.	R	Text	Yes*
D15	All Share Accounts	Dividend Rate	Current dividend rate for each share account.	2	Number	Yes*
D16	All Share Accounts	Date of Last Activity	Date of last deposit or withdrawal.	03312017	Date	Yes*
D17	All Share Accounts	Share Amount Frozen	Dollar amount of the account the member cannot access.	5000.00	Number	Yes*
D18	All Share Accounts	Last Activity Code	Identifies the type of account activity that occurred last by code.	FM	Text	Yes
D19	All Share Accounts	Accrued Dividend Interest	Dollar amount of accrued dividends.	25.36	Number	Yes
D20	All Share Accounts	Last File Maintenance Date	Last date of any non-financial modification to the account (e.g., dividend rate, member address, etc.).	03312017	Date	Yes
D21	All Share Accounts	Last File Maintenance User ID or Initials	Approving official or employee's transaction code or initials.	AH	Text	Yes
D22	All Share Accounts	Date Negative Shares	The date the share account first went negative without cure.	03312017	Date	No
D23	All Share Accounts	Joint Owner	Provide the name of the joint owner's full legal name. Format: Last Name, Suffix (if applicable), First Name, Middle Initial for individuals. For businesses, provide full legal name.	Long Sr., John, S.	Text	No
D24	All Share Accounts	Membership Type	Provide the membership type using the following identifiers: Single ownership, Joint ownership, Trustee,	Business	Text	No

#	Applies To	Field	Description	Example	Data Format	Current NCUA Standard Field ²³
			or Business.			
D25	All Share Accounts	Last Statement Date	Date the member statement was last generated.	03312017	Date	No
D26	Share Certificate Accounts	Step/Bump Dividend Rate	Indicator if the share certificate product has a term that allows the member to "step-up" or "bump-up" the dividend rate.	Y	Y/N	No
D27	Share Certificate Accounts	Certificate Date Granted	Date member opened the share certificate account.	03312017	Date	Yes*
D28	Share Certificate Accounts	Certificate Maturity Date	Date the share certificate will mature.	03312017	Date	Yes*
D29	Business Accounts	Name of Beneficiaries	Full legal name of individuals who are beneficiaries on business accounts Format: Last Name, Suffix (if applicable), First Name, Middle Initial.	Long Sr., John, S.	Text	No

Table 3: Security and Non-Negotiable CD Investment Electronic Fields²⁴

#	Field	Description	Example	Data Format	Current NCUA Standard Field
I1	Download Cut-off date	Effective date of the data.	03312017	Date	No
I2	Record Code	Report D for Deposits, L for Loans, I for Investment.	L	D/L/I	No
I3	CUSIP Number	Committee on Uniform Securities Identification Procedures number. Security identifier.	23345abcd	Text	No
I4	Original Face Value	Original face value of the investment.	100,000	Number	No
I5	Current Face Value	Current face value of the investment.	100,000	Number	No
I6	Book Value	Current book value of the investment.	102,000	Number	No
I7	Fair Value	Current fair value of the investments.	102,000	Number	No
I8	Maturity Date	Maturity date of investment.	12312017	Date	No
I9	Coupon/Rate	Stated coupon or rate of investment.	5	Number	No
I10	Floating Rate	Indicator if the investment has floating rate.	Y	Y/N	No
I11	Issuer	Name of issuer of the investment.	Wells Fargo	Text	No

²⁴ NCUA has not previously published a standard structure for investment data. This will facilitate robust analytics with a dynamic, quantitative third-party service platform for interest rate risk assessment of individual securities and portfolios without requiring the examiner to reformat data files or request additional data from the credit union.

#	Field	Description	Example	Data Format	Current NCUA Standard Field
			Bank		
I12	Settlement Date	Date funds are exchanged.	10312015	Date	No

Table 4: Consumer and Credit Card Loan Electronic Fields

#	Field	Description	Example	Data Format	Current NCUA Standard Field ²⁵	ILDR Field ²⁶
C1	Effective date of the download	Effective date of the data.	03312017	Date	No	No
C2	Record Code	Indicate D for Deposits, L for Loans, I for Investment.	L	D/L/I	Yes*	No
C3	Taxpayer ID	Nine digit code used by the US Government (TIN). For individuals use social security number.	123456789	Number	Yes*	Yes
C4	Borrower ID	Primary key identifier for the entity. This is the number used to uniquely identify the member/non-member such as an account number.	ABC123456	Text	Yes*	Yes
C5	Member Name	Full legal name. Format: Last Name, Suffix (if applicable), First Name, Middle Initial for individuals. For business provide full legal name.	Long Sr., John, S.	Text	Yes*	Yes
C6	Address Line 1	Street address.	7247 Circle Sun	Text	Yes*	Yes
C7	Address Line 2	Address line 2.	PO Box 858	Text	Yes	Yes
C8	City	City where borrower resides. For business accounts, provide the city of the main or head office.	Fairfax	Text	Yes*	Yes
C9	State	Post office state code where borrower resides. For business accounts, provide the state of the main or head office.	NM	Text	Yes*	Yes
C10	Zip Code	Zip code where borrower resides. For business accounts, provide the zip code of the main or head office.	80521	Number	Yes*	Yes
C11	Insiders and Employees	If data supports, report "D" for directors, supervisory committee,	E	Text	Yes	Yes

²⁵ Identifies fields requested in NCUA Letter to Credit Unions 03-CU-05 (April 2003). Fields identified with an asterisk (*) are categorized as “critical” fields by NCUA in Letter to Credit Unions 03-CU-05.

²⁶ NCUA reviewed the Interagency Loan Data Request (ILDR) issued in March 2013. The ILDR provides a standard format for banks to electronically provide loan data. In comparison to the 82 data fields in the ILDR, the sample loan formats include 61 similar loan fields. <https://www.fdic.gov/news/news/financial/2013/fil13012.html>.

#	Field	Description	Example	Data Format	Current NCUA Standard Field ²⁵	ILDR Field ²⁶
		and credit committee members, "O" for executive officers, and "E" for employees who are not executive officers. If the CEO is also the Board Treasurer, report as an executive officer - "O". If the credit union or vendor data does not support this scheme, simply identify insider status with Y/N.				
C12	Business Type	Provide the member's North American Industry Classification System (NAICS) code where majority of their revenue is generated from.	54194	Text	No	Yes
C13	Branch ID	Identifies the originating service facility.	01C	Text	Yes	Yes
C14	Loan ID	Unique identifier for each loan.	A	Text	No	Yes
C15	Loan Category	The type of loan. Provide "Commercial/MBL", "Residential Real Estate", or "Consumer".	Commercial	Text	No	No
C16	Loan Type	The type of loan product as defined by the vendor or credit union (e.g. New or Used Auto, Credit Card Fixed, Credit Card Variable, etc.).	Capital LOC	Text	Yes*	Yes
C17	Purpose Code	Description of what the proceeds will be used for; Reason for loan.	Auto purchase	Text	Yes*	Yes
C18	Origination Date	The note date; date the loan was originated. Do not report the date of last advance.	03312017	Date	Yes*	Yes
C19	Original Loan Amount	The original principal amount of the loan.	1500.45	Number	Yes*	Yes
C20	Payment Amount	Amount of regularly scheduled payment.	780.25	Number	Yes*	Yes
C21	Loan Term	The contractual number of payments required by the note or modification of the note.	60	Number	Yes*	Yes
C22	Payment Frequency	The interval of time payments are contractually required (monthly, quarterly, annually, balloon/maturity, etc.).	M	Text	Yes*	Yes
C23	Balloon Flag	Indicator the loan is a balloon loan.	Y	Y/N	No	No
C24	Balloon Term	Number of months from origination until balloon date.	84	Number	No	No
C25	Interest Only Flag	Indicator the borrower pays only the interest on the principal balance for a set period of time, with the principal balance unchanged.	Y	Y/N	No	No
C26	Interest Only Term	The length of time (in months) during which the borrower pays only interest on the principal balance.	12	Number	No	No

#	Field	Description	Example	Data Format	Current NCUA Standard Field ²⁵	ILDR Field ²⁶
C27	First Payment Date	Date the first payment was/is due.	03312017	Date	No	No
C28	Maturity Date	Date when full payment on the loan is contractually due. For balloon loans, this should be the same as the balloon expiration date.	03312017	Date	No	Yes
C29	Interest Rate	The contractual rate of interest currently applied to this loan at origination.	5.000	Number	Yes*	Yes
C30	Loan Type	The type of loan product as defined by the vendor or credit union (e.g. New or Used Auto, Credit Card Fixed, Credit Card Variable, etc.).	Capital LOC	Text	Yes	Yes
C31	Current Interest Rate	The contractual rate of interest currently applied to this loan.	5	Number	No	Yes
C32	First Rate Adjustment Date	Initial date the interest rate will/did adjust on variable rate loans.	03312017	Date	No	No
C33	Next Rate Adjustment Date	Future date interest rate will adjust on variable rate loans.	03312017	Date	No	No
C34	Lifetime Interest Rate Cap	The maximum rate the loan can reach over its contractual term.	18.000	Number	No	Yes
C35	Interest Rate Floor	The minimum rate the loan can reach over its contractual term.	4.000	Number	No	No
C36	Variable Rate Index	Interest rate base index used when the loan's rate varies with an index.	Prime	Text	No	Yes
C37	Variable Rate Margin	The margin added or subtracted from the index to get the rate.	2	Number	No	No
C38	Current Credit Limit	The maximum a borrower can currently incur.	2500.00	Number	No	No
C39	Date Closed	Date a line of credit was closed.	03312017	Date	No	No
C40	Credit Score at Origination	Credit score of the primary borrower (e.g. FICO or Beacon) obtained from a credit bureau that was used in the underwriting of the credit. If two bureau scores were used, provide the highest score. If the credit union obtains all three bureau scores, provide the middle score.	825	Number	Yes*	Yes
C41	Original Credit Score Date	Date of the primary borrower's credit score at origination.	03312017	Date	No	No
C42	Current Credit Score	Most recent primary borrower credit score obtained by the credit union.	745	Number	No	No
C43	Current Credit Score Date	Most recent date of updated credit score for the primary borrower.	03312017	Date	No	No
C44	Guarantor	Name of entity/person that guarantees the loan. With multiple	Long Sr., John, S.	Text	No	Yes

#	Field	Description	Example	Data Format	Current NCUA Standard Field ²⁵	ILDR Field ²⁶
		guarantors, give the primary one.				
C45	Co-Maker/Co-Borrower/Guarantor	The name of the co-maker/co-borrower whose signature(s) appears on the promissory note or loan agreement. Provide the first one when there are multiple co-makers/co-borrowers.	Long Sr., John, S.	Text	No	Yes
C46	Co-Maker/Co-Borrower Credit Score at Origination	Credit score of the co-maker/co-borrower at the time of origination.	680	Number	No	No
C47	Current Credit Score Date of Co-Borrower	Most recent date of updated credit score of the co-borrower/co-maker.	03312017	Date	No	No
C48	Original Credit Score Date of Co-Borrower	Credit score of the co-borrower/co-maker (e.g. FICO or Beacon) obtained from a credit bureau that was used in the underwriting of the credit. If two bureau scores were used, provide the highest score. If the credit union obtains all three bureau scores, provide the middle score.	800		No	No
C49	Loan Officer	Code or loan officer name responsible underwriting and/or borrower relationship.	BB	Text	No	Yes
C50	Loan Approver	Code or name of approving official. Indicate if approved by the Credit Committee or Board of Directors.	AG	Text	Yes	No
C51	Loan Risk Grade	Credit union internal risk rating at origination. The credit union's internal loan risk grade (e.g., A, B, C, or D paper).	A	Text	Yes	Yes
C52	Collateral Protection Insurance	Indicator loan has coverage for when insurance coverage lapses.	Y	Y/N	No	No
C53	GAP Indicator	Indicator the member purchased gap insurance on the collateral.	Y	Y/N	No	No
C54	Credit Life	Indicator loan has a life insurance policy designed to pay off the borrower's debt if they die.	Y	Y/N	No	No
C55	Credit Disability	Indicator loan has disability insurance designed to pay the borrower's debt if they become disabled.	N	Y/N	No	No
C56	Loan Collateral	The narrative description of the collateral (e.g., year, make and model; 38 unit apartment building, etc.).	1996 Ford Mustang	Text	No	Yes
C57	Collateral Code	The system code associated with the collateral type (e.g., residential real	Residential real estate	Text	Yes*	Yes

#	Field	Description	Example	Data Format	Current NCUA Standard Field ²⁵	ILDR Field ²⁶
		estate, etc.).				
C58	Origination Collateral Value	Total value of collateral at loan origination.	50000.00	Number	No	Yes
C59	Collateral Valuation/ Appraisal Date (Origination)	Date collateral was appraised or valued at loan origination.	20170313	Date	No	Yes
C60	Current Collateral Value	Dollar value of collateral when last assessed by the credit union.	45150.65	Number	No	No
C61	Most Recent Collateral Value/Appraisal Date	Date collateral was last appraised or valued.	03312017	Date	No	Yes
C62	Lien Position	The credit union's lien position on the collateral (e.g., 1st, 2nd, 3rd, etc.). If more than one collateral, identify the primary collateral's lien position.	1	Number	No	Yes
C63	VIN Number	Vehicle Identification Number/ unique identifier for collateral.	1GTV2TEH8EZ173011	Text	No	No
C64	Current Loan Balance	Current outstanding principal balance of the loan. If the member has overpaid the note and the credit union is carrying a credit balance, provide the number as a negative balance with a minus sign as the first character (e.g., -33.56).	84500.01	Number	Yes*	Yes
C65	Date of Last Payment	Date the last payment was made.	03312017	Date	No	Yes
C66	Number of Remaining Payments	The remaining contractual number of payments required by the loan.	24	Number	Yes*	No
C67	Next Payment Due Date	The date the next payment, principal or interest, is due. For delinquent loans, this will be in the past.	03312017	Date	Yes*	Yes
C68	Accrued Interest	Total amount of interest accrued and not yet received on a loan.	180.32	Number	Yes*	Yes
C69	Late Charges	Late charges currently due and unpaid.	95.06	Number	No	Yes
C70	Debt to Income Ratio	Debt payments divided by gross or net income calculated at time of loan origination.	35.670	Number	No	No
C71	Days Past Due	Number of days the note is past due beyond the due date as of the effective date of the download. If loan is current or paid ahead, report as zero.	75	Number	Yes*	Yes
C72	Delinquency Counter 30-59	Number of times past due 30-59 days since origination date.	2	Number	Yes	Yes

#	Field	Description	Example	Data Format	Current NCUA Standard Field ²⁵	ILDR Field ²⁶
	Days					
C73	Delinquency Counter 60-89 Days	Number of times past due 60-89 days since origination date.	4	Number	Yes	Yes
C74	Delinquency Counter 90-119 Days	Number of times past due 90-119 days or more since the origination date.	0	Number	Yes	Yes
C75	Delinquency Counter 120 Days +	Number of times past due 120+ days or more since the origination date.	1	Number	Yes	Yes
C76	Last Renewal Date	The date the loan was last renewed.	03312017	Date	No	Yes
C77	Loan Modification	Indicator if the loan has been modified. A loan modification permanently restructures the terms of an existing loan. A loan modification is not a new loan, but a renegotiation of an existing loan.	Y	Y/N	No	No
C78	Date of Loan Modification	Date of last loan modification.	20170313	Date	No	Yes
C79	Capitalized Interest Amount	Amount of interest added to the loan principal balance.	259.63	Number	No	Yes
C80	Amount of last advance	Dollar amount of the last advance.	55000.00	Number	No	No
C81	Interest rate reset interval	Time between periodic reset dates for variable or adjustable rate loans expressed in days.	30	Number	No	Yes
C82	Troubled Debt Restructure	Indicates if a loan is currently a troubled debt restructure as defined by GAAP.	Y	Y/N	No	Yes
C83	Nonaccrual	Indicate if the loan is currently on nonaccrual.	N	Y/N	No	Yes
C84	Charge-Off Flag	Indicator if entire loan has been charged off.	Y	Y/N	No	No
C85	Charge Off Amount	Amount of principal charged off this loan.	5000.00	Number	Yes	Yes
C86	Charge Off Date	Date the loan was charged off.	03312017	Date	No	No
C87	Last File Maintenance Date	Date of last file maintenance change on this loan.	03312017	Date	Yes	No
C88	Last File Maintenance User ID or Initials	User ID of person who made last file maintenance change.	JB100	Text	Yes	No
C89	Last File Maintenance action Code	Description of what was last changed on the member loan (e.g., due date, name, loan status, etc.).	DD	Text	No	No
C90	Interest Rate Spread	Interest rate variance from the index rate changed on the note. Express in terms of a percentage. For	2.25	Number	No	Yes

#	Field	Description	Example	Data Format	Current NCUA Standard Field ²⁵	ILDR Field ²⁶
		example, the premium of a note written at Prime +2.25% would be expressed as 2.25.				

Table 5: Indirect Loan Electronic Data Fields

#	Field	Description	Example	Data Format	Current NCUA Field	ILDR Field
Includes all fields from <i>Table 4: Consumer and Credit Card Loan Electronic Data Fields</i> and the following:						
ID1	Dealer Code	Name of sales agent for indirect auto loans.	Hanks Auto Sales	Text	No	Yes
ID2	Indirect Loan Flag	Indicator if the loan was originated through an indirect loan program.	Y	Y/N	No	No
ID3	Dealer Reserve Balance	Current dealer reserve against the note.	3,000	Number	No	Yes

Table 6: Participation Loan Electronic Data Fields

#	Field	Description	Example	Data Format	Current NCUA Field	ILDR Field
Includes all fields from <i>Table 4: Consumer and Credit Card Loan Electronic Data Fields</i> and the following:						
P1	Participation Sold (Original Amount)	The original amount of this note that was sold.	9,000,000	Number	No	Yes
P2	Participation Sold (Current Balance)	The current balance of the amount sold.	8,750,000	Number	No	Yes
P3	Participation Purchases (Original Amount)	The original amount of this note that was purchased.	9,000,000	Number	No	No
P4	Participation Purchases (Current Balance)	The current balance of the amount purchased.	8,750,000	Number	No	No
P5	Purchase percentage	Shows the percentage of the total participation loan owned by the credit union for individual loan purchases.	20.000	Number	No	No
P6	Originating/Lead Lender	Shows the name of the originating/lead lender in the participation.	ABC FCU	Text	No	No
P7	Sold Percentage	Identify the percentage of total participation loan the credit union	90.999	Number	No	No

#	Field	Description	Example	Data Format	Current NCUA Field	ILDR Field
		sold.				

Table 7: Residential Real Estate Loan Electronic Data Fields

#	Field	Description	Example	Data Format	Current NCUA Field	ILDR Field
Includes all fields from <i>Table 4: Consumer and Credit Card Loan Electronic Data Fields</i> and the following:						
R1	Property Type	Indicate the property type (e.g., Single, Multi, Condominium, etc.).	Condo	Text	No	No
R2	Collateral State	Post office state code where collateral property is located.	AZ	Text	No	No
R3	Collateral City	City where collateral property is located.	Phoenix	Text	No	No
R4	Collateral County	County where collateral property is located.	Maricopa	Text	No	No
R5	Collateral Zip Code	Zip code where collateral property is located.	85255	Number	No	No
R6	Property in Flood Zone	Indicator if the collateral securing the loan is in a designated flood zone.	Y	Y/N	No	No
R7	Draw Period	Remaining period of time (in months) a borrower can withdraw funds from a credit account.	120	Number	No	No
R8	Current Escrow Balance	Amount currently in escrow for payment to third parties such as insurance and real estate taxes. In the case of a negative escrow balance, report the data in this field with a minus sign in the first character position (e.g., -350).	2,585	Number	No	Yes
R9	Number of Renewals	Indicate the number of times the loan has been renewed.	2	Number	No	Yes

Table 8: Commercial/Member Business Loan Electronic Data Fields

#	Field	Description	Example	Data Format	Current NCUA Field	ILDR Field
Includes all fields from <i>Table 4: Consumer and Credit Card Loan Electronic Data Fields</i> and the following:						
CL1	Current Loan Risk Grade Commercial/ MBL	Credit union internal risk rating at recent review/evaluation of commercial/MBL; Number or letter grade determined based on the level of risk.	1	Text	No	Yes
CL2	Date of	Date the most recent internal risk	03312017	Date	No	Yes

#	Field	Description	Example	Data Format	Current NCUA Field	ILDR Field
	Current Loan Risk Grade Commercial/ MBL	rating at recent review/evaluation of commercial/MBLs.				
CL3	Debt Service Coverage Ratio (DSCR)	Debt service coverage ratio calculated for the loan at origination.	1.05	Number	No	No
CL4	Personal guaranty status	Identify the level of personal guaranty of the principals (e.g., full, limited, or none).	Full	Text	No	No
CL5	Environmental Review Level at origination	Identify the level of environmental review at origination (e.g., borrower questionnaire, record search, phase 1, or phase 2).	Phase 1	Text	No	No
CL6	Environmental Review Date	Date of environmental review at origination.	03312017	Date	No	No
CL7	Last Periodic Review	Date of last periodic/annual file review.	03312017	Date	No	No
CL8	Property Type	Indicate the property type (e.g., Single, Multi, Condominium, etc.).	Condo	Text	No	No
CL9	Collateral State	Post office state code where collateral property is located.	AZ	Text	No	No
CL10	Collateral City	City where collateral property is located.	Phoenix	Text	No	No
CL11	Collateral County	County where collateral property is located.	Maricopa	Text	No	No
CL12	Collateral Zip Code	Zip code where collateral property is located.	85255	Number	No	No
CL13	Property in Flood Zone	Indicator if the collateral securing the loan is in a designated flood zone.	Y	Y/N	No	No
CL14	Draw Period	Remaining period of time (in months) a borrower can withdraw funds from a credit account.	120	Number	No	No
CL15	Current Escrow Balance	Amount currently in escrow for payment to third parties such as insurance and real estate taxes. In the case of a negative escrow balance, report the data in this field with a minus sign in the first character position (e.g., -350).	2,585	Number	No	Yes
CL16	Policy Exception	Indicator if the loan is an exception to policy.	Y	Y/N	No	No
CL17	Number of Renewals	Indicate the number of times the loan has been renewed.	2	Number	No	Yes
CL18	Specific Reserve	Amount of specific reserve for loan losses on this note which is not available to offset losses on any other loan.	50,000	Number	No	Yes

Table 9: Student Loan Electronic Data Fields

#	Name	Description	Example	Data Format	Current NCUA Field	ILDR Field
Includes all fields from <i>Table 4: Consumer and Credit Card Loan Electronic Data Fields</i> and the following:						
S1	Time to Repayment	For deferred loans: Amount of time, in months, until repayment period begins.	65	Number	No	No
S2	Deferred Status	Indicator if student loan is in deferred status.	Y	Y/N	No	No

By the National Credit Union Administration Board on October 19, 2017.

Gerard Poliquin
Secretary of the Board

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