

**From:** [Whitmyer, Jessica](#)  
**To:** [PRA Comments](#)  
**Cc:** [Murray, Kelly](#); [Parrish, Jill](#); [Navoney, Jonathan R](#)  
**Subject:** Call report change comments - Members 1st FCU  
**Date:** Wednesday, November 24, 2021 3:18:55 PM  
**Attachments:** [image001.png](#)  
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Good afternoon!

We have reviewed the proposed changes to the Call report for March 2022, and while we understand the need to change the format and requested information to allow for the calculation of risk based capital, there are some additions to the requested information that are not feasible to provide in the format requested, which do not have an impact on the calculation of risk based capital. These include:

- Page 6 – request for Loan Interest Income YTD by Call Report line item.
  - Interest income is aggregated on a loan type basis rather than on a call report line item basis, therefore it is not feasible to regroup these transactional items to comply with the call report loan categories which look at attributes such as lien position (which can change over the life of the loan, but does not change loan type over the life of the loan); and commercial loan status (which can change over the life of the loan based on MBL/Commercial loan designations). Static related requests (balance and count), which are at a point in time, can take into account the attributes of the loans at that point in time to more easily provide the requested data, as we have done previously. We recommend removing the requirement to provide Interest Income YTD by Call Report loan line item and replace this with the request to provide Interest Rate, as was previously requested. By reporting the most common interest rate in the call report line item category it removes the challenge of providing granular transaction level data.

Additionally, we find it prudent given the significant number of changes required, to provide Credit Unions with an extended deadline for the 1<sup>st</sup> quarter 2022 submission so that we can ensure accurate reporting of our data.

We appreciate if you take this into consideration.



**Jessica L. Whitmyer, CPA**

VP of Finance/Controller  
at Members 1st FCU

**Phone** (717)697-1161 x. 5714

**Email** [whitmyerj@members1st.org](mailto:whitmyerj@members1st.org)

5000 Louise Drive, PO Box 40  
Mechanicsburg, PA 17055

[members1st.org](http://members1st.org)

