

# PUBLIC SUBMISSION

**As of:** 9/26/24, 2:42 PM  
**Received:** September 25, 2024  
**Status:** In\_Review  
**Category:** Federal credit union  
**Tracking No.** mli-f7we-l8qo  
**Comments Due:** November 15, 2024  
**Submission Type:** Web

**Docket:** NCUA-2024-0115  
Proposed Agency Information Collection Activities; Comment Request

**Comment On:** NCUA-2024-0115-0001  
Agency Information Collection Activities; Proposals, Submissions, and Approvals

**Document:** NCUA-2024-0115-DRAFT-0009  
Anonymous Comment

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## General Comment

Thank you for the opportunity to comment on the proposed revisions to the Call Report.

Regarding the proposal to add two accounts for credit unions to report the number and amount of loans granted to credit union officials and senior executive staff year-to-date: I think the enhancement to NCUA's offsite supervision of this change is minimal. Credit unions already report the number and amount of loans outstanding to credit union officials and senior executive staff. The benefit to the NCUA of this proposal does not justify the effort for the credit union to track and report this information.

Regarding the proposal to add three accounts for credit unions to report the maturity distribution of total uninsured shares and deposits: This proposal is confusing and does not aid NCUA in evaluating depositor behavior. If a single member has \$200,000 in a money market account and \$200,000 in a five-year share certificate, the member has \$150,000 in uninsured shares. Are their uninsured shares in the money market account or the five-year share certificate? How NCUA answers this question and instructs credit unions to complete the credit union will be subjective at best. The subjective nature of how various credit unions reply to these accounts on the Call Report will not result in usable information for the NCUA.