## [External] Comment on Proposed 5300 Call Report Changes - 2025-Q1

**From** Scott Odom <Scott.Odom@vantagewest.org>

**Date** Wed 1/15/2025 4:38 PM

**To** _PRA Comments <PRAComments@NCUA.GOV>

Dear Sir or Madam,

The latest proposed 5300 Call Report changes include a change to Schedule D, Section 3, NCUA Insured Savings Computation adding columns for reporting the maturity distribution of total uninsured shares and deposits.  This requirement would be in addition to the current reporting of uninsured shares and deposits in the Call Report. Requiring credit unions to report uninsured shares and deposits by maturity will introduce significant complexity, making it difficult to assess accurately. It will necessitate costly, customized reporting to capture this level of detail. To comply, credit unions will need to assess uninsured shares by first categorizing share insurance account types (such as individual, joint, retirement, trusts, revocable trusts, and irrevocable trusts), then evaluating ownership and beneficiary relationships, and finally applying share insurance based on maturity. If adopted, these complexities could lead to inaccurate assessments and reports.

Additionally, the cost and complexity of the request is not supported by a commensurate benefit to the agency.  It is unclear how the extra data would help the NCUA evaluate depositor behavior. The proposed accounts involve uninsured shares and deposits, which remain uninsured regardless of maturity, raising doubts about the relevance of such information.  Ultimately, reporting these details would create a significant challenge for credit unions, requiring substantial resources that could be better spent on serving members. For these reasons, I urge the NCUA to reconsider or withdraw the proposal to require reporting of uninsured shares and deposits by remaining maturity.

Regards,

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