January 27, 2023

Jodie Harris, Director
CDFI Fund
Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

RE: Annual Certification and Data Collection Report Form and the Abbreviated Transaction Level Report (OMB Control Number 1559-0046)

Dear Director Harris:

Thank you for the opportunity to comment on the CDFI Fund's updates to the Annual Certification and Data Collection Report Form (ACR) and Abbreviated Transaction Level Report (TLR). We appreciate the CDFI Fund's efforts to automatically populate some of the reporting fields with publicly available data and to address other known issues with the current reporting forms. Despite this handful of positive changes, the new ACR and TLR reports, if adopted in their proposed form, will create barriers to participation and confusion for eligible CDFI credit unions and we urge the CDFI Fund to update them to address the issues we outline in these comments.

We appreciate the Fund's recent announcement that it will update its timeline for rolling out the new CDFI Certification Application to allow additional time to consider and incorporate public comments. The new certification materials currently present challenges, including accuracy and alignment of definitions and program requirements with the requirements of prudential regulators that examine CDFI depositories for safety and soundness as well as compliance with consumer protection laws. For example, the ACR and TLR documents include at least five obvious copy-editing errors, three ambiguous questions, four definitions that are not reconcilable with credit union data, and requests for data that can only be reported by FA awardees in a form designed and labeled specifically for non-awardees. We note that the current delay could have been avoided had the Fund followed through with promised consultations with the CDFI Coalition at any time since the close of the first comment period in November 2020. Such consultations would have quickly identified the most serious issues that have surfaced in the proposals released by the Fund over the past two months. In short, the CDFI Fund should not rely on public comment for this level of editing, but should engage CDFIs throughout its policy and reporting form development process to ensure the policies, procedures and materials issued for final comment are appropriately designed and thoroughly vetted by practitioners.

As it works to finalize the ACR and TLR, the Fund should focus on addressing challenges posed by the new Certification Application, clarifying confusingly worded or poorly structured questions, avoiding collection of personally identifiable information (PII), and aligning definitions with existing regulations, guidance and terminology used by prudential regulators. In addition, the Fund should ensure that any policy decisions regarding cure periods are developed with CDFI input through a public comment process rather than enacting a major policy change through an update to data collection forms. With these additional changes, we believe that the CDFI Fund will be able to collect the data it needs to ensure CDFIs are meeting the Fund's certification standards without creating an undue administrative burden on CDFIs, especially regulated CDFIs that already have significant reporting obligations.

<u>About Inclusiv</u>

Inclusiv is the first and only CDFI Intermediary for credit unions and the national network of community development credit unions. Our mission is to promote financial inclusion and equity through credit unions. Credit Unions are not-for-profit financial cooperatives owned by, governed by, and focused on providing safe and affordable financial services to their members. Inclusiv members comprise Low Income Designated, Minority Depository Institution, and CDFI credit unions, as well as financial cooperativas based in Puerto Rico. The Inclusiv network represents more than 500 credit unions serving 18.4 million people in predominantly low-income urban, rural, and reservation-based communities across 47 states, Washington DC, the U.S. Virgin Islands and Puerto Rico. Inclusiv channels capital to and builds capacity of these institutions that are dedicated to serving low-income people and redlined and disinvested communities. We offer technical assistance at no cost to our 308 CDFI-certified members each year and have helped hundreds of credit unions obtain and maintain their CDFI certification.

<u>The Fund's Time Estimates Are Unrealistically Low</u>

In the ACR and TLR documents, the CDFI Fund estimates that completing the reports will take 14 and 10 hours, respectively. These estimates are unrealistically low for CDFI credit unions that currently have nearly 18 million members and issue more than five million loans every year. Inclusiv provides reporting support to hundreds of CDFI credit unions and has first-hand experience helping smaller, less resourced institutions compile and submit reports to the Fund. The ACR and TLR are more likely to take between 80 and 120 hours for a CDFI credit union to complete. First, the transaction data the Fund requests are stored on multiple systems, so reporters must not only extract the needed data from their systems but correctly merge the data to create the reports. Then, CDFIs must upload their reports to AMIS. Historically, credit unions have experienced significant delays in uploading their TLRs, sometimes stretching on for months, as AMIS often crashes when a credit union uploads a large TLR. These delays have occurred despite the relatively modest scale of TLR reporting to date; in the FY 2020 TLR cycle CDFIs of all types uploaded fewer than 800,000 total transactions, while the proposed TLR for Financial Services alone would require the upload of data on 18 million credit union members. Given that institutions will now have to complete the Abbreviated TLR to be eligible to complete the ACR, these delays could have significant consequences for credit unions' CDFI certification. We urge the Fund to both simplify the requested data by removing unnecessary research fields and duplicative requests and ensure that AMIS is prepared to take in the much larger TLR files that will result from depository CDFIs uploading their TLRs for both transactions and Financial Services.

In addition to the "Abbreviated" TLR, which adds two new templates that make it lengthier than the TLR that FA grantees have previously been required to submit, new ACR form in some cases exceeds the level of detail needed for the updated Certification Application itself. For example, the proposed requirement that CDFIs reassign portfolio classifications of all outstanding loans would be an impossible burden for CDFI credit unions that have more than 14 million outstanding loans that have been originated over the past several decades and are already classified according to regulatory standards.

Any attempt to further classify these historical loans by Target Market status, as also requested in the proposed TLR, would require hundreds of hours of work to produce, at best, an estimate with no statistical validity.

The Fund has never required CDFIs to complete a full certification application annually, yet the current proposal dramatically narrows the difference between a full certification and an annual report. We recommend the Fund simplify the ACR and TLR and make the adjustments suggested below to ensure that CDFI certification remains manageable for small, high-impact community-based CDFI credit unions that will struggle to find the resources to manage the Fund's increasingly complex reporting requirements.

<u>Existing Barriers to Certification are Perpetuated in the ACR and Abbreviated TLR</u>
As detailed in Inclusiv's December 5, 2022 and December 19, 2022 comment letters to the Fund, the updates to the Certification Application and Approved Target Market Verification Methodologies will effectively prohibit some CDFI credit unions from seeking or renewing certification if the Fund does not address key issues. These issues include conflicts between the Fund's requirements and financial regulations and guidance from prudential regulators, accountability requirements that exclude well-qualified people from serving as accountable board members, and a narrowing of the definition of development services that discounts the critical work CDFI credit unions do to provide access to banking services and ensure people are not targeted by predatory fringe financial services providers. The new ACR and TLR assume that workable Low-Income Targeted Population (LITP) and Other Targeted Population (OTP) methodologies will be available to all CDFIs, but the Fund has not yet approved methodologies, like expanded Investment Area geographies, geographic proxies for LITP and Bayesian name and geocoding proxies for OTP, that will permit regulated depositories to efficiently and accurately track and report on their lending to these target markets. We urge the Fund to adopt the verification methodologies laid out in Inclusiv's comment letters to address these issues and ensure that regulated CDFI depositories may continue to effectively document their work with these communities.

<u>Update Confusing and Poorly Structured Questions and Pre-Populate Reports with Call Report Data</u>
A number of the updated ACR and TLR reporting requirements are phrased confusingly, structured in a way that will hinder accurate reporting and analysis, or are not answerable by CDFI credit unions, either because the definitions do not align with NCUA or COSSEC guidance or because they were designed for unregulated loan funds rather than regulated depositories. Specific, page-by-page suggestions for both the ACR and Abbreviated TLR are detailed below.

*Corrections, Clarifications and Revisions Needed in the ACR Instructions*

- On page 12 of the ACR Instructions, the percentage of Governing Board members who identify as Native Hawaiian is mis-typed as "who identify as Native American."
- In the same table, the number and percentage of Governing Board members who identify as Native Alaskan is included twice.

- On page 18 of the ACR Instructions, the Fund asks if there have been changes to a CDFI's senior leadership team without providing a definition of senior leadership. It would be helpful to clarify which positions or types of positions the Fund considers senior leadership.
- On page 20 of the ACR Instructions, the Fund asks "Indicate whether the reporting entity's Legal entity status has changed?" and a "Yes" response means that the entity's status has not changed. This formulation is unnecessarily confusing and could easily be fixed by rewording the question as "Is the reporting entity's Legal entity status the same as when last affirmed by the CDFI Fund?" so that "Yes" indeed means there has been no change. The Fund should consider similar wording adjustments to the Accountability section of the ACR as well.
- Starting on page 58 of the ACR Instructions, in the Development Services Detail section the Fund asks CDFIs to tie each of their areas of Development Services focus to the provision of a specific Financial Product. As noted with the proposed certification application itself, this requirement may make sense for CDFI loan funds that mostly focus on a particular lending specialty, with few, if any consumer loans. The requirement makes no sense for CDFI depositories, especially credit unions that issue more than 90% of loans to consumers through hundreds of distinct products. For depositories and consumer lenders, development services that improve basic banking skills or credit can result in people borrowing any one, or more, of a wide array of consumer loan products.
- On page 60 of the ACR Instructions, the Financial Data Detail section includes only one record type for Credit Unions. NCUA-supervised credit unions and cooperativas, however, have different charts of accounts and the Fund should ensure the ACR includes appropriately designed questions for each institution type, which will require two options: Credit Unions and Cooperativas. The Fund has provided separate cross-walks for credit unions and cooperativas in the FA, ERP and RRP application guidance and we urge the Fund to do so in the ACR as well.
- On page 60-61 of the ACR Instructions, Total Equity, Government Grants, and Off-Balance Sheet Financing Capital are included as data fields but are omitted from the corresponding list of fields in the Regulator Attestation section on page 56, even though the data for all three fields can be pre-populated from credit union call reports.[1]
- On page 61 of the ACR Instructions, the Total Outstanding Loan Guarantee Portfolio line should be pre-populated for credit unions using call report account code LQ00024.
- On page 62 of the ACR Instructions, a data field of Loans 90 Days or More Past Due is included. For credit unions, it should be amended to Loans 60 Days or More Past Due to align with call report data.
- On pages 60 and 66 of the ACR Instructions, the Fund requests data on Government Grants. Credit union call reports include data on grants received (Acct_927) but the field is not limited to government grants.

[1] Equity can be calculated by subtracting Total Liabilities (Account LI0069) from Total Assets (Account 010); Grants are reported in Account 927 (may include non-government grants); and Off-Balance Sheet Financing Capital can be calculated by subtracting total Draws Against Lines of Credit (Account 885A4) from total Line of Credit Limit (Account 881).

- On page 73 of the ACR Instructions, the total number and dollar values for the Financial Products Portfolio Breakdown Detail for Depositories should be pre-populated from call report data using only major portfolio categories. CDFI credit unions currently have more than 14 million outstanding loans issued over several decades, which would preclude the detailed sub-classifications of outstanding loans in categories such as “charter schools” or “climate-centered financing,” which are not aligned with regulatory portfolio classifications. As shown in Annex 3, credit union call reports can be used to efficiently group outstanding loans into four major categories: Business Financing; Commercial Real Estate Financing; Consumer Financing and Residential Real Estate Financing. These four categories are sufficient to understand the major focus of a credit union’s lending activities over time. Any additional detailed classification of current lending activities can be gathered from transaction-level reports (TLRs).
- On page 74 of the ACR Instructions, the Portfolio Breakdown must not require a further breakdown of the number and dollar amount of outstanding loans in a CDFI’s Target Market. As noted above, CDFI credit unions currently have more than 14 million outstanding loans in portfolio, most of which were issued in prior years, including many issued prior to the creation of the CDFI Fund itself. It is impossible to conduct a precise target market analysis of these loans, as regulations would prohibit the collection of confidential data needed to verify the current Target Market status for all portfolio loans. The only alternative would be to estimate the Target Market percentages of outstanding loans based on current lending activities, but this would yield unreliable estimates based on data from unrepresentative samples with no statistical significance, which would be of absolutely no value for research or reporting. Without any possible use for this data, the CDFI Fund should remove the Target Market breakdown from the portfolio section.
- On page 77 of the ACR Instructions, Source of Capital requests depositories to report information that is readily available from call reports.
- On page 78 of the ACR Instructions, the Fund requests data on the interest rates CDFIs pay on their capital in the Source of Investment Capital Table in the ACR. As shown in Annex 1, credit union call reports include detailed information on interest rates paid on different types of deposit accounts and interest rates charged for different types of loans. We understand that the information may need to be manually reported by unregulated CDFIs, but the CDFI Fund can meet its data collection objectives for credit unions by simply downloading publicly available data.
- Similarly, beginning on page 80 of the ACR Instructions, the Fund plans to collect data on operating revenue via the Contributed Operating Revenue Table of the ACR. This section appears to have been designed to help the Fund better understand the operating structure of unregulated CDFI loan funds. As shown in Annex 2, credit union call reports include ample data on operating revenue that can be pre-populated for depositories should the Fund include this section in the final ACR.

*Corrections, Clarifications and Revisions Needed in the Abbreviated TLR*

- On page 8 of the TLR Guidance, all FIPs codes should be expanded to 12-digits to allow for the use of census block group Investment Areas and LITP coding.
- Also on page 8, Latitude and Longitude should be omitted from the Financial Services and Loan Purchase sections and should be blocked as a selection for all loans made to individuals in the Project compliance check to avoid the collection and potential exposure of consumer PII.
- On page 11 of the TLR Guidance, the Fund requires reporting of Loan Status for purchased loans. The status of loans purchased within a single year does not provide helpful, new information regarding CDFI credit unions' loan performance as a wide array of standard performance metrics are available in quarterly call reports and financial performance ratios issued by regulators. This field should be omitted for regulated depositories.
- On page 13 of the TLR Guidance, the Fund references the CDFI Fund 2011-2015 ACS Eligible Investment Areas, but the Fund recently issued ACS 2016-2020 Eligible Investment Areas. Please note that the new IAs continue to omit the US Virgin Islands, Guam and American Samoa and do not list IA eligible counties and census block groups. These omissions should be corrected before certification is reopened.
- On page 16 the TLR Guidance asks for reporting of Transaction Types, like loan loss reserves and capital reserves, that are only possible for FA recipients, even though this document is specifically for "CDFI Certification Applicants and Certified CDFIs that are not current Financial Assistance (FA) Recipients." The Fund should remove FA recipient-specific reporting from this abbreviated TLR. Also, any further updates to the TLR for FA recipients should recognize that CDFI credit unions do not calculate loan loss reserves in such a way that they could answer this question, and that capital reserves are not tied to specific transactions.
- On page 33 of the TLR Guidance, the new "Climate-Centered" Finance choice in the Purpose data field is not exclusive of the other choices and is likely to cause confusion; a wide variety of commercial, consumer and real estate loan products could also be "Climate-Centered". The Fund should consider "Climate-Centered" as a lens that can apply to many types of loans rather than a specific loan type. The Fund should create a separate field that would allow CDFIs to identify "Climate-Centered" loans within all types of loan and investment products.
- On page 35 of the TLR Guidance, the Loan Status section should be removed. The status of loans within the first 6-18 months of issuance cannot provide the Fund with useful information on the financial performance of CDFIs, and the data are not relevant to certification nor to grant reports as they are only an unrepresentative sample of performance data on recently issued loans. Delinquency and charge-off rates can only be meaningfully calculated and evaluated based on total outstanding loans. For regulated depositories, that data is readily available in quarterly call reports, in aggregate and at the portfolio level.
- On page 37 of the TLR Guidance, the Client ID section should be removed, or, at a minimum, depositories should be permitted to omit the section. It is not clear why the Fund wishes to identify when multiple loans are made to a single borrower or how the Fund will consider this data point in making decisions about certification or recertification. Since depositories will not report consumer loans as individual transactions in the TLR, this identifier will be useful only for

a subset of CDFI depositories' loans and will not provide a complete picture of depository lending to the Fund.

- On page 38 of the TLR Guidance, the Fund requests information on borrowers' entity structure. This information is not required to determine certification eligibility and should be omitted from the abbreviated TLR.
- On page 39 of the TLR Guidance, the Fund requests information on whether borrowers are Women Owned or Controlled. Although supporting women-owned enterprises is a laudable goal, women are not an eligible CDFI target market so it is unclear why the Fund is requesting this data point and we recommend omitting it as completing the abbreviated TLR is already a significant undertaking.
- On pages 39 and 40 of the TLR Guidance, the Fund asks for reporting on the race and ethnicity of each borrower separately from OTP reporting. The Fund should ask for this information only in the context of OTP reporting.
- On pages 40 and 41 of the TLR Guidance, the Fund asks for detailed information about borrower income levels that exceed what's necessary to determine certification eligibility. The income categories should be collapsed to Low-Income, Not Low-Income, and Do Not Know.
- On page 47 of the TLR Guidance, the Fund should ensure that address may not be uploaded for loans where the Investee Type is equal to "IND." Similar protections should be put in place for the Project FIPS Code, Latitude and Longitude fields detailed on pages 51-52. These changes will ensure that PII cannot be accidentally uploaded.
- On page 54 of the TLR Guidance, in the Consumer Loans/Investments Originated Table (CLR) the Total Originated Amount field states "For LOC and credit cards, report the credit limit amount. If the amount is unknown, enter "1"." We recommend the Fund clarify whether this applies only to credit cards and LOCs issued within the year or to all active credit cards and LOCs. The guidance on page 28 includes only new accounts but the instructions on page 54 are ambiguous. In addition, the Fund should explicitly defer to the definitions and guidance provided by prudential regulators. For example, for credit unions, the Fund should refer to NCUA's definition of Loans Granted Year-To-Date, which reads, "lines of credit and credit card loans should only be counted as a new loan in the period they are granted or renewed, not each subsequent draw on the open line of credit. Credit decisions to increase a line of credit should be treated as a new loan for the entire amount, not just the incremental increase."[2] By clearly recognizing regulatory guidance, the Fund can ensure that its own guidance remains evergreen and up to date with an ever-evolving regulatory environment for CDFI depositories.
- On page 56 of the TLR Guidance (related to the CLR) the Fund asks depositories to provide loan amounts and number of loans made to OTP borrowers, but then on pages 57 through 63 asks for the number and dollar amount in each separate OTP category, even though the form does not allow for loans to be reported in more than one Target Market category. Since the CLR does not allow double counting, the Fund should remove the generic OTP columns from this form just keep the columns for the specific OTP categories.

[2] National Credit Union Administration Call Report Form 5300 Instructions, effective September 30, 2022

- Throughout the TLR Guidance, the OTP categories do not include Asian American and Pacific Islander (AAPI). We note that Treasury has announced its intention that AAPI subgroups will be classified as Other Targeted Populations and expect this to be reflected in the final certification application, ACR and TLR templates and guidance.

*Pre-Populate Reports with Call Report and TLR Data*

We appreciate the Fund's efforts to align sections of the ACR and TLR with credit unions' call report data and to pre-populate those fields. There are a number of additional fields, for example, the Primary and Secondary Line of Business questions in the ACR that pull in data from the TLR, that can and should be pre-populated with call report data to ensure consistent reporting across federal agencies and streamline reporting for regulated CDFI depositories, as required by the Riegel Act. The Financial Data Detail section should also be pre-populated using data from the National Credit Union Administration (NCUA) or relevant regulator. The CDFI Fund should fully rely on call report data and adopt regulatory definitions for all financial and portfolio reporting fields; in fact, call reports often provide more detail than the Fund requests and analysis of these data points can be automated. The Annexes to this letter detail additional fields that the Fund should pre-populate with call report data and provides the corresponding variable name from the call reports CDFI credit unions submit to the NCUA.

By relying on call report data, the Fund will be able to assess CDFI credit unions' activities and ensure they do not raise concerns for the Fund. If any specific data point in a call report raises a particular concern, the Fund should follow up with the CDFI depository to request any additional data or narrative information that might be needed. For example, as of September 30, 2022, the median interest rate charged by CDFI credit unions on unsecured credit cards was 10.05%; for all other unsecured loans and lines of credit the median rate was 11.36%. Only two CDFI credit unions report interest rates on unsecured loans at the maximum allowable rate of 28%. This data shows that the overwhelming majority of CDFI credit unions charge interest rates well below the Fund's interest rate guidance. But, for the two that reported higher interest rates, the Fund could follow up to request additional data to ensure the institutions met the Fund's standards.

In addition to pre-populating fields with call report data, the Fund should take every opportunity possible to pre-populate ACR fields using TLR data. For example, the ACR asks for Total Target Market Credit Union Members on page 15, and this figure will be provided in the TLR and should be pre-populated. Similarly, the ACR question on whether a CDFI met the required Target Market activity threshold could be pre-populated based on the TLR.

We urge the Fund to include COSSEC, the regulator for cooperativas based in Puerto Rico, to the list of regulators from which the Fund will pre-populate data. Although COSSEC is not yet set up to provide cooperativas' data automatically, we expect that they will add that capacity in the future. The Fund should ensure that the ACR and TLR allow for that update.

<u>Avoid Collection of PII to Address Data Security Concerns</u>

The TLR Guidance notes that the Fund will continue to use the existing CDFI TLR Address Report to collect location data for each transaction. However, the current TLR Address report allows CDFIs to upload home addresses for residential real estate loans, which risk the exposure of homeowners' PII. The Fund should ensure that the Address Report does not permit the upload of address information for any loans made to individuals.

In the TLR for Financial Services, the Fund reassures CDFIs that the CIMS will not save addresses provided to determine whether credit union members live within Investment Areas but instead will produce a file with only FIPS codes. This is a good approach to protecting confidential member information, but is undone by the requirement to include XY coordinates for all members, which are just as geographically specific as addresses and pose the same data security and confidentiality concerns. The Fund should ensure its systems do not accept addresses or coordinate data for any loans made to individuals or for any account-holders.

Issue Clear Policies on Cure Periods and ERP Reporting

*The CDFI Fund Should Not Issue Cure Period Policy Via the ACR*
The ACR Form and Instructions includes a significant policy statement with far-reaching consequences for regulated depository CDFIs. On page 45 of the ACR Instructions, as the eighth and final note in the Target Market Attestation section, the Fund writes that "No additional cure periods will be granted for a reporting entity that fails to meet the Target Market requirement based either on its most recently completed FY or a three-year period."

This statement is a new policy that has never before been released for public comment and that is missing key information that will help institutions decide whether or not they should move forward with CDFI certification. It is inappropriate to make policy via a data collection tool and particularly inappropriate to include such a critical policy update only in the notes to a data field. The Fund should engage in a public rulemaking on its cure standards. At a bare minimum, CDFI Fund must provide key policy details in advance of reopening certification, including:

- How the Fund will assess the 3-year Target Market percentage: which geocode sets and Investment Area maps will be used for transactions closed prior to 12/31/2022?
- If this proposed policy were to be implemented, would a CDFI that fell below the Target Market threshold summarily lose their certification?
- For CDFIs with active Assistance Agreement that lose their certification, will the CDFI Fund recapture those awards?

The proposed approach to Target Market cures is problematic, especially to CDFI credit unions that serve fields of membership that include both low- and middle-income people as they often experience refinancing booms driven by their higher income members when interest rates are low. The Fund's new Target Market Financial Services Option is a major step forward in addressing this issue, but we are concerned the lack of an effective cure policy will undermine that progress. We urge the Fund to adopt a forward-looking cure period of at least a full performance year to address Target Market lending shortfalls rather than summary decertification. If the Fund is unwilling to consider a forward-looking cure period, a grace period of continued certification must be offered, which would bar any new applications for financial awards but allow CDFIs sufficient time to unwind loans and investments that required CDFI certification.  These measures would allow regulated institutions to avoid significant sanctions from their prudential regulators and other wider repercussions from a loss of certification.

*Coordination of CDFI and ERP Reporting Is Vital for Continued Participation in Fund Programs*
Another policy issue we urge the Fund to address is how CDFI certification and reporting will be aligned with reporting for the Equitable Recovery Program (ERP). The Fund must issue guidance on whether or not CDFIs should include ERP-related transactions in the TLR before reopening certification. It is critical that the Fund support CDFIs in managing two parallel reporting systems by either matching reporting requirements across programs or significantly simplifying ERP reporting given that it appears that ERP transactions will have to be geocoded using 2010 Census FIPS codes while all other transactions will use 2020 Census FIPS codes. Without thoughtful, coordinated reporting requirements, CDFIs that receive ERP awards will need to invest in redundant data tracking and reporting systems, wasting resources that could be better used to support responsible, high-impact lending and provision of affordable financial services in their communities.

Thank you for the opportunity to comment on this important aspect of CDFI certification. If you have any questions about this comment letter, please contact Alexis Iwaniszziw, Senior Vice President of Policy and Communications, at aiwaniszziw@inclusiv.org.

Sincerely,

Cathie Mahon
President/CEO, Inclusiv

# ANNEX 1

## Credit Union Call Report Account Codes for CDFI Data Collection:  Interest Rates

### Interest Rates on Deposits

| Account Code | Description |
|---|---|
| Acct_532 | Dividend/Interest Rate of Money Market Shares with Min Balance Req, Withdraw Limits, no Fixed Maturity |
| Acct_547 | Dividend/Interest Rate of Share Certificates with 1 Year Maturity |
| Acct_552 | Dividend/Interest Rate of Regular Shares |
| Acct_553 | Dividend/Interest Rate of Share Drafts |
| Acct_554 | Dividend/Interest Rate of IRA/KEOGH and Retirement Accounts |
| Acct_585 | Dividend/Interest Rate of All Other Shares |
| Acct_599 | Dividend/Interest Rate of Non-Member Deposits |

### Interest Rates on Loans

| Account Code | Description |
|---|---|
| Acct_521 | Interest Rate of Unsecured Credit Card Loans |
| Acct_522 | Interest Rate of All Other Unsecured Loans/Lines of Credit |
| Acct_522A | Interest Rate of Payday Alternative Loans (PAL loans) |
| Acct_523 | Interest Rate of New Vehicle Loans |
| Acct_524 | Interest Rate of Used Vehicle Loans |
| Acct_525 | Interest Rate of Commercial Loans/Lines of Credit Real Estate Secured |
| Acct_526 | Interest Rate of Commercial Loans/Lines of Credit Not Real Estate Secured |
| Acct_562 | Interest Rate of Total Other Real Estate Loans/Lines of Credit |
| Acct_562A | Interest Rate of Total Loans/Lines of Credit Secured by Junior Lien 1-4 Family Residential Properties |
| Acct_562B | Interest Rate of All Other Real Estate Loans/Lines of Credit |
| Acct_563 | Interest Rate of Total 1st Mortgage Real Estate Loans/Lines of Credit |
| Acct_563A | Interest Rate of Total Loans/Lines of Credit Secured by 1st Lien 1-4 Family Residential Properties |
| Acct_565 | Interest Rate of Leases Receivable |
| Acct_595 | Interest Rate of Total All Other Loans/Lines of Credit |
| Acct_595A | Interest Rate on Non-Federally Guaranteed Student Loans |
| Acct_595B | Interest Rate of All Other Secured Non-Real Estate Loans/Lines of Credit |

# ANNEX 2

## Credit Union Call Report Account Codes for CDFI Data Collection: Revenue

| Account Code | Description |
|---|---|
| Acct_017 | Income (loss) Div/Int |
| Acct_100 | Total Gross Income |
| Acct_115 | Total Interest Income |
| Acct_116 | Net Interest Income after Provision for Loan and Lease Losses or Credit Loss Expense |
| Acct_117 | Total Non-Interest Income |
| Acct_120 | Income from Investments (Including Interest and Dividends) |
| Acct_131 | Fee Income |
| Acct_388 | Net Income (loss) after Cost of Funds |
| Acct_392 | Adjusted Net Income (Loss) After all Reserve Transfer |
| Acct_395 | Income (Loss) before Cost of Funds |
| Acct_440 | Other Non-Operating Income (Expense) |
| Acct_440A | NCUSIF Stabilization Income |
| Acct_602 | Net Income (unless the amount is already included in Undivided Earnings) |
| Acct_659 | Other Operating Income (Include unconsolidated CUSO Income) |
| Acct_660A | Net Income (Loss) before Extraordinary Adjustment |
| Acct_661 | Income (Loss) from Operations (Total Gross Income less Total Operating Expenses) |
| Acct_661A | Net Interest Income After Provision for Loan and Lease Losses plus Non-Interest Income Less Total Non-Interest Expense. |
| Acct_835A | Net income (loss) of CUSO |
| Acct_945B | Other Comprehensive Income (unless already included in item 33 or 34) |
| Acct_IS0004 | Interest income on Securities held in a Trading account |
| ACCT_IS0005 | Other Interest Income |
| ACCT_IS0010 | Net Interest Income |
| Acct_IS0020 | Other Operating Income (Includes unconsolidated CUSO Income) |

## ANNEX 3

**Credit Union Call Report Account Codes for CDFI Data Collection: Portfolio Breakout**

| CDFI Data Field | Account Codes | Description |
|---|---|---|
| Business Financing (#) | Acct 900T1 - (Accts 143A3+143A4+961A7) | Total Number of Commercial Loans MINUS Total Number of commercial Real Estate Loans |
| Business Financing ($) | Acct 400T1 - (Accts 143B3+143B4+042A7) | Total Amount of Commercial Loans MINUS Total Amount of Commercial Real Estate Loans |
| Commercial Real Estate Financing (#) | Accts 143A3+143A4+961A7 | Number of Construction and Development Loans to Members PLUS Number of Construction and Development Loans to Non-Members PLUS Number of Loans Secured by Farmland |
| Commercial Real Estate Financing ($) | Accts 143B3+143B4+042A7 | Amount of Construction and Development Loans to Members PLUS Amount of Construction and Development Loans to Non-Members PLUS Amount of Loans Secured by Farmland |
| Consumer Financing (#) | Acct 025A - (Accts 900T1 + 959A + 960A+LN0056) | Total Number of Loans and Leases MINUS (Number of Commercial/Business Loans PLUS Number of First Lien on Single Residential Propoerty PLUS Number of 2nd Lien on Single Residential PropertyPLUSNumber of PPP Loans |
| Consumer Financing ($) | Acct 025B - (Accts 400T1 + 703A + 386A + LN0057) | Total Amount of Loans and Leases MINUS (Amount of Commercial/Business Loans PLUS Amount of First Lien on Single Residential Propoerty PLUS Amount of 2nd Lien on Single Residential PropertyPLUSAmount of PPP Loans |
| Residential Real Estate Financing (#) | Accts 959A+960A | Number of Loans/Lines of Credit Secured by a First Lien on a single 1- to 4-Family Residential Property PLUS Number of Loans/Lines of Credit Secured by a Junior Lien on a Single 1- to 4-Family Residential Property |
| Residential Real Estate Financing ($) | Accts 703A+386A | Amount of Loans/Lines of Credit Secured by a First Lien on a single 1- to 4-Family Residential Property PLUS Amount of Loans/Lines of Credit Secured by a Junior Lien on a Single 1- to 4-Family Residential Property |

# ANNEX 4

## Credit Union Call Report Account Codes for CDFI Data Collection: Sources of Capital

| CDFI Data Input Field | Account Codes | Description |
|---|---|---|
| Deposits | Acct 018 | Amount of Total Shares and Depposits |
| Debt-Secondary Capital | Acct 867C | Amount of Subordinated Debt (note: "Secondary Capital" no longer exists for credit unions) |
| Debt-Other | Accts 883C + 011C + 058C | Amount of Total Borrowings (can be further broken down by source for Lines of Credit and Term Borrowings using Account Codes 885A, 885A1, 885A3, 885A2, LQ0034, LQ0038, LQ0042, LQ0044, LQ0046, LC0085, LQ0052) |
| Business Financing (#) | Acct 900T1 - (Accts 143A3+143A4+961A9) | Total Number of Commercial Loans MINUS Total Number of commercial Real Estate Loans |
| Business Financing ($) | Acct 400T1 - (Accts 143B3+143B4+042A9) | Total Amount of Commercial Loans MINUS Total Amount of Commercial Real Estate Loans |
| Commercial Real Estate Financing (#) | Accts 143A3+143A4+961A9 | Number of Construction and Development Loans to Members PLUS Number of Construction and Development Loans to Non-Members PLUS Number of Loans Secured by Farmland |
| Commercial Real Estate Financing ($) | Accts 143B3+143B4+042A9 | Amount of Construction and Development Loans to Members PLUS Amount of Construction and Development Loans to Non-Members PLUS Amount of Loans Secured by Farmland |
| Consumer Financing (#) | Acct 025A - (Accts 900T1 + 959A + 960A+LN0056) | Total Number of Loans and Leases MINUS (Number of Commercial/Business Loans PLUS Number of First Lien on Single Residential Propoerty PLUS Number of 2nd Lien on Single Residential PropertyPLUSNumber of PPP Loans) |
| Consumer Financing ($) | Acct 025B - (Accts 400T1 + 703A + 386A + LN0057) | Total Amount of Loans and Leases MINUS (Amount of Commercial/Business Loans PLUS Amount of First Lien on Single Residential Propoerty PLUS Amount of 2nd Lien on Single Residential PropertyPLUSAmount of PPP Loans) |
| Residential Real Estate Financing (#) | Accts 959A+960A | Number of Loans/Lines of Credit Secured by a First Lien on a single 1- to 4-Family Residential Property PLUS Number of Loans/Lines of Credit Secured by a Junior Lien on a Single 1- to 4-Family Residential Property |
| Residential Real Estate Financing ($) | Accts 703A+386A | Amount of Loans/Lines of Credit Secured by a First Lien on a single 1- to 4-Family Residential Property PLUS Amount of Loans/Lines of Credit Secured by a Junior Lien on a Single 1- to 4-Family Residential Property |