



**America's  
Credit Unions**

August 18, 2025

Ms. Melane Conyers-Ausbrooks  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314

**RE: Request for Comments- NCUA Form 5300 (OMB Number 3133-0004)**

Dear Ms. Conyers-Ausbrooks:

On behalf of America's Credit Unions, I am writing in response to the National Credit Union Administration's Request for Comment to revise the NCUA Call Report (Form 5300) and Instructions. America's Credit Unions is the voice of consumers' best option for financial services: credit unions. We advocate for policies that allow the industry to effectively meet the needs of their over 143 million members nationwide. America's Credit Unions and its member credit unions appreciate the opportunity to provide input on the Request for Comment and the NCUA's efforts to improve clarity and accurate reporting in Call Reports.

We support the agency's ongoing Call Report modernization efforts and respectfully request that any revisions under OMB Control No. 3133-0004 be guided by three goals: (1) improved data quality and comparability; (2) reduced reporting burden, especially for smaller and non-complex credit unions; and (3) transparent implementation with sufficient lead time, clear instructions, and robust vendor coordination.

America's Credit Unions has received feedback from its members relating to the Call Report. Specifically, some members have reported confusion regarding the Call Report Certification Page. The print and signature blocks lack clarity due to the presence of four separate lines. It would be far simpler if this page contained one print line and one signature line. Members have also suggested additional signature blocks if multiple credit union personnel review the Call Report. To further eliminate ambiguity, we recommend that the Certification Page identify the expected signers (for example, CEO/Manager and CFO or equivalents) and include a field for title; doing so would be beneficial because it clarifies authority and would reduce exam follow-up. Additionally, we recommend that the NCUA state in the Instructions that certification within CUOnline constitutes the official signature for Form 5300 and that no separate wet signature is required; doing so would align the Instructions with current practice and eliminate uncertainty for filers. We further recommend harmonizing the posted PDF "Certification" page with the CUOnline process, such as relabeling or watermarking the signature lines as "For reference—

certified in CUOnline”, as this will prevent confusion when institutions rely on the PDF in policy manuals or audit files.

Furthermore, members have reported issues with inputting financial data into the Call Report. Specifically, when a user inputs a number into a schedule, it should automatically be placed into the accompanying Financial Statement page. This would prevent numeric errors and ensure that all amounts are equal, ultimately saving time and resources. Building on this, we recommend the NCUA enhance the existing real-time edit checks, which already distinguish hard errors from soft warnings, by making severity and required actions more prominent on screen and in the Instructions; doing so would reduce resubmissions and end-of-quarter surprises. We further recommend adding a visible calculation trace for derived metrics (such as capital ratios) so reviewers can see how fields tie together, and pre-populating prior-quarter values to focus attention on material changes rather than forcing complete re-entry. To reduce re-keying and better align with diverse core systems, the NCUA could add secure API or CSV upload options in addition to the current XML import, and consolidate the published schema, account-descriptions spreadsheet, and “Edits: Errors and Warnings” into a single, versioned validation rulebook with the existing test utility, so institutions and vendors would be able to test and correct issues before quarter-end.

Several instruction areas would also benefit from added clarity and examples. We recommend the NCUA continue aligning the Instructions with GAAP/CECL into a legacy/transition note (retained only for historical periods or non-CECL filers) and by centralizing nonaccrual and charge-off timing guidance—with brief examples and an explicit cross-reference to Appendix B to Part 741—to reduce interpretive variability and examiner follow-ups. Furthermore, providing illustrative examples for common edge cases or situations that technically fit within existing Call Report categories but have quirks that make the right line-item, timing, or measurement non-obvious (e.g., participations, indirect lending, and loan modifications) would help to promote uniform reporting across institutions.

The NCUA should seek to minimize disruption to the greatest extent possible in implementing these changes. We request at least two quarters of lead time after final instructions are published, a public redline comparing old and new Instructions, a change-log with effective dates, and agency-hosted trainings with office hours. The NCUA should also pilot test revisions with a diverse set of volunteer credit unions and their vendors, publish FAQs during the pilot, and coordinate filing deadlines to avoid core vendor blackout periods.

Finally, we encourage continued interagency coordination so that Call Report definitions remain comparable across time and, where appropriate, with analogous bank call report terms. Consistency improves data usefulness for examiners, policymakers, and the public, while lowering compliance costs for filers.

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America's Credit Unions appreciate the opportunity to comment on this Request for Comment. If you have any questions, please do not hesitate to contact me at 202-961-5731 or [tmaron@americascreditunions.org](mailto:tmaron@americascreditunions.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'TJ Maron', with a stylized, cursive script.

Tyler J. Maron  
Regulatory Affairs Counsel