

Family First Credit Union

Record Retention Policy

Purpose

The record retention policy is designed to notify Family First Credit Union of records and policies that should be retained and the duration of their retention in regards to NCUA regulations.

Board of Directors

The Board of Directors authorizes the credit union to develop a policy for the retention of all its records and policies and the duration that they are kept. This is done in compliance with the requirements of the statute of limitations established by the state along with any other applicable laws and regulations.

Staff

There will be designated staff to handle the management, retention and disposal of said records and policies. All staff will have access to the records and policies for their knowledge. Training will also be provided to staff with access to the records.

Schedule/Log

A schedule of the retention of the policies will be created along with a disposal log stating the records that were destroyed, when they were destroyed, and who destroyed them. Also a storage log will be kept and it contains which records and policies are stored, where they are stored, and when they were stored. An audit of these logs will be done at least once a year.

Procedures

Procedures or instructions will be created for inventorying, retaining, destroying, etc. of the records. Destruction of records will be done by at least two people.

Administrative Records	Retention Period
<ul style="list-style-type: none"> • Charter • Bylaws and amendments • Certificate of share insurance • Certificate or licenses to operate various government programs • Minutes of meetings (annual shareholders meetings, board of directors, credit committee, and supervisory committee) • Minutes of Special Membership meetings • Supervisory committee annual audit • Supervisory committee records of member account verification • Abandoned property (escheat reports until payment to state) • Records preservation program and list of records destroyed • Copy of each financial report NCUA form 5300 or equivalent • Credit Union Profile Report • NCUA Form 4501 or equivalent and or state's credit union department at the end of each quarter • NCUA examination reports • Paid bond claims 	Permanent
<ul style="list-style-type: none"> • Share and Loan balances for all members account • Financial report listing all of the institution assets and liabilities • Bank reconcilements • Listing of credit union's financial institutions, insurance, policies, and investments • Audit Reports and Record of account verification • General Ledger • Journal and Cash Record and EDP daily proof listing • Dormant accounts listing • Personnel Affirmative action plans/EEOC • Off premises record preservation log 	Permanent with on and off site back-ups
<ul style="list-style-type: none"> • Court orders 	7 years
<ul style="list-style-type: none"> • Powers of Attorney 	6 years after account closed
<ul style="list-style-type: none"> • ATM Network Report/ Activity or Transaction Report 	2 years

• 1099 listing	6 years following tax year
• Security program and log	Until superseded
• Inventory of furniture and equipment and depreciation schedule	4 years after tax filing
• Bond (premium receipts and declaration page)	Permanent
• Insurance policies	6 years
• Insurance coverage report	6 years
• Personnel records	6 years after termination
• Application and resumes approved	3 years
• Application and resumes declined	6 years
• Personnel attendance records	3 years
• Safe deposit box access tickets	2 years
• Canceled signature cards for safety deposit boxes	2 years after close
• Copies of rent receipts (safety deposit boxes)	2 years
• Leases or contracts, vendor closed accounts	2 years after close
• Correspondence	2 years after close
• Forced entry records	6 years
• Records and/or contents of drilled safety deposit boxes	6 years
• Payroll records	Comply with Fair Labor Standards Act, Federal Unemployment Act, etc. (4 years)
• Immigration verification form (INS Form I-9)	3 years after date of hire or 1 year after date termination per Immigration Reform and Control Act
Compliance Regulations	Retention Period
Evidence of Reg. B compliance <ul style="list-style-type: none"> • Applications, supporting information and required notifications (adverse action notices & ECOA notice) • Pre-screened solicitations (text & criteria) • Written compliances alleging violations of ECOA • Self-tests information related to Fair Lending • Right to Appraisal Notices/ waivers of that right 	25 months (12 months for business credit over \$1 million gross revenue)

Evidence of Reg. E compliance <ul style="list-style-type: none"> EFT error resolution documents (logs, spreadsheets, memos, etc.) Error- related documentation (notice of error from sender support documentation, investigation) 	2 years from date of notice of error
<ul style="list-style-type: none"> Wire Remittance Pre-payment Disclosure, receipt disclosure, or combined disclosure Change in terms notice 	5 years
Evidence of Reg. Z compliance <ul style="list-style-type: none"> Applications, support materials TILA disclosures (initial & closing) New Loan Estimate Form New Closing Disclosure Right of Rescission forms Evidence of compliance with requirements regarding periodic statements Copies of advertisements (including transcripts of non-print media) Copies of marketing materials used by the institution 	5 years
Evidence of Reg. CC compliance <ul style="list-style-type: none"> Evidence of compliance with funds availability, notices, and other aspects with its procedures 	2 years
NCUA Part 707 Compliance with Truth in Saving Act <ul style="list-style-type: none"> Must be able to show established procedures for paying interest/dividends. Rate and balance information must be sufficient to verify interest/dividends paid on accounts (samples disclosures needed) 	2 years
Evidence of Reg. C compliance (HMDA) <ul style="list-style-type: none"> Complete register (LAR) and modified HMDA-LAR for public Public disclosure statement 	3 years 5 years
Regulation V: Evidence of Fair Credit Reporting Act compliance <ul style="list-style-type: none"> Pre-approved/pre-screened credit offers (criteria, requirements for collateral, text) 	3 years

Evidence of Reg. X (RESPA) compliance <ul style="list-style-type: none"> • HUD-1 Good Faith Estimate • HUD-1A Settlement form • New Loan Estimate Form • New Closing Disclosure • Applications, support information • Documents related to kickbacks and unearned fees retention • Affiliated Business Arrangement documents • Servicing Disclosure Statement • Record Keeping for Escrow Accounts 	5 years (longer for items under investigation and/or dispute)
BSA <ul style="list-style-type: none"> • Currency Transaction Reports • CTR exemptions records • Large currency transaction forms • Correspondence for law enforcement or other agency • Member Identification Program (CIP) 	5 years
<ul style="list-style-type: none"> • Suspicious Activity Report and supporting documentation 	5 years from date of report (up to 10 years for items under investigation)
OFAC <ul style="list-style-type: none"> • Office of Foreign Assets Control Records of Compliance 	5 years
National Flood Insurance Act <ul style="list-style-type: none"> • Flood Hazard Determination forms • Evidence of flood insurance if required • Notices of force-placed flood insurance 	Life of the loan
Regulation D: Reserve Requirements for Depository Institutions <ul style="list-style-type: none"> • Daily Reserve Calculation 	1 exam cycle
Regulation G&H SAFE Mortgage Licensing Act	FI must submit and keep current (within 30 days) changes in information on Mortgage Loan Originators on the NMLS Registry
Regulation M: Consumer Leasing <ul style="list-style-type: none"> • Advertising and alternative disclosure (merchandise tags) relative to consumer leasing 	2 years
Regulation P: Privacy of Consumer Financial Information	Evidence of procedures recommended for one exam cycle

Electronic Signatures in Global and National Commerce (E-SIGN Act) <ul style="list-style-type: none"> Must be able to show that procedures are in place to ensure consent and to ensure retainable forms are provided to consumers 	Life of the loan
Servicemember's Civil Relief Act (SCRA) <ul style="list-style-type: none"> Loan documentation and work papers for any credit that has been designated under the SCRA for protection 	Life of the loan
Homeowners Protection Act (HOPA) <ul style="list-style-type: none"> PMI disclosures Annual notice of right to cancel PMI 	Life of the loan
Fair Housing Act <ul style="list-style-type: none"> All advertising and marketing is required to have equal housing disclosure or Fair Housing logotype 	1 exam cycle
Ability to Repay (mortgage rules) <ul style="list-style-type: none"> Evidence of efforts to determine income, assets, and other Ability to Repay factors 	Evidence of compliance (3 years)
HOEPA Rule (mortgage rules) <ul style="list-style-type: none"> List of housing counseling agencies that meets the summary of data instructions for Housing Counseling Agency 	Must have list available for all federal-related mortgage applicants
Loan Originator Rule (mortgage rules) <ul style="list-style-type: none"> Records of all compensation paid loan originators Loan Originators compensation agreements or contracts 	3 years after of the date of each receipt or payment

Mortgage Servicing Rules (Small Servicing Exemption may apply)	Retention Period
Mortgage Servicing File <ul style="list-style-type: none"> Schedule of transactions, instruments, communication with borrower notes, data fields relating to loan, documents provided to borrower regarding error resolution or loss mitigation 	2 year after loan discharged/transferred
Prompt Payment, Crediting, and Statements <ul style="list-style-type: none"> Written request and evidence of compliance 	1 exam cycle
Force-placed insurance <ul style="list-style-type: none"> Disclosure letter 	Life of the loan
Error resolution and info request <ul style="list-style-type: none"> Evidence of compliance 	Must recognize request within 5 business days and

	respond in 30 (keep a log)
Early intervention with delinquent borrowers <ul style="list-style-type: none"> • Disclosure • Log • Training • Evidence of compliance 	Keep copies of notices with loan file. Small Service Exemption
Continuity of contact with delinquent borrowers	Keep copies of notices with loan file. Small Service Exemption
Loss Mitigation Procedures <ul style="list-style-type: none"> • Evidence of compliance • Tracking • Loss mitigation applications 	Keep copies of notices with loan file (keep at least 1 year after discharge date) Small Service Exemption
Member Records	Retention Period
Individual deposit/share and loan history	7 years
Periodic statements (data)	7 years
Payroll deduction authorization	4 years cancellation of authorization
Court orders, judgments and releases of members' accounts	5 years
Membership application/Account agreement	Permanent/Until superseded
Withdrawals	5 years
Deposits	5 years
E- Journal	1 year
Trial balances, automated or non-automated	
<ul style="list-style-type: none"> • If statement or account history retained 	Optional
<ul style="list-style-type: none"> • If no alternate record 	5 years
Form 1099 <ul style="list-style-type: none"> • 1099 listing, summary 	3 years
IRA account records	7 years after close
Checks paid	7 years
Stop payment request	2 years from last renewal date
Undelivered statements	5 years
Daily record of overdrafts	Optional
Deposits slips	1 year
Periodic statements of member	Permanent
Zero balance report	1 month
Change of Address records	1 year
Dormant account	Permanent
Return item record	5 years

Loan Records	Retention Period
Loan applications approved and denied	25 months after loan is closed or denied
Loan application denial notice	25 months from date of member notification
Disclosure statements	2 years after date disclosures are required to be made
Security agreement	Loan is paid in full or collateral is released
Financing (UCC-1) statement or verification of vehicle lien	Loan is paid in full or collateral is released
Real estate mortgage	Loan is paid in full, then release
Notice of rescission	2 years or loan is paid in full (whichever comes first)
Abstracts, deeds, titles insurance, insurance policies, etc.	Loan is paid in full
Security agreement for property held by the credit union	Loan is paid in full and property is returned
Receipt for Return of Property	7 years from date of return of property
Collateral held by the credit union (stock, CD's, insurance policies, jewelry, etc.)	Loan is paid in full or until released. Return to borrower and obtain receipt
Insurance loss payable notices	Until superseded or until collateral is released
Borrower's and co-maker's credit reports and financial statements	Loan is paid in full
Credit disability insurance forms	Loan is paid in full
Open End Agreements to Pay	Permanent
Canceled open end agreements	7 years after canceled
Credit committee minutes	Permanent
Charged off loans and records	10 years after paid in full
Flood insurance certificates	Life of the loan
Hazard insurance policies	Life of the loan
List of cancelled credit cards	1 year
1098 data	5 years

Credit Union Investments	Retention Period
Documents evidencing investment of funds	3 years after close
Safekeeping records and receipts	5 years after close
Broker confirmations	2 years
Broker invoices	2 years
Broker statements	3 years
Descriptive literature on securities disposed of	2 years
Buy and sell agreement (mortgage backed securities)	2 years after maturity or sale

Collections Documents	Retention Period
Bankruptcy Records	10 years
Charge Off Accounts	7 years
Delinquent Loan Report	7 years
Delinquent Loan Statistics	2 audit cycles
Judgments	10 years
Paid Collection Files	6 years after paid debt
Closed Collection Files	Based on likelihood of future repayment

Organizational/Other	Retention Period
Correspondence - General	4 years
Correspondence - Government	Permanent
Correspondence – NCUA	Permanent
Credit Union Policies	Permanent
Documents regarding CU owned property	Permanent
Federal Credit Union Act (current edition)	Permanent
Government Manuals (current edition)	Permanent
Joint membership agreements	Permanent
Liquidation Documents	5 years after cancellation of charter
Liquidation documents demonstrating payment of creditors and equitable distribution of member shareholdings	5 years following date of cancellation of CU charter
Special Credit Union Rules and Regulations	Permanent
Taxation Correspondence	6 years
ACH documents necessary to resolve questions re: handling of items and to resend items	6 years
ACH Processed Register	6 years
ACH Returns and Adjustments	6 years
Billing Dispute documentation of required actions	2 years after settlement of dispute

Deposit Slips/credit tickets for each transaction or equivalent direct deposit or wire transfer over \$100	5 years
Wire transfer debit and credit entries	5 years
Wire transfer log	5 years
Bank Books	6 years
Bank Deposit slips	6 years
Bank Statements (CU's accounts)	6 years
Cash Rec'd Voucher	6 years
Certified Check Receipts	6 years
CU Investment Records	6 years
Dividend Register	Permanent
Earning Records (payroll)	6 years
Financial Statements	Permanent
Financial Statistical Reports	Permanent
Interest Refund payment records	6 years
Invoices, bills and statements (paid)	6 years
Money Order Register	6 years
Monthly proof tapes of share and loan ledgers	2 audit cycles
Share and Loan Ledger	Permanent
Statement of Financial Condition	Permanent
Statement of Income and Expense	Permanent
Statement of Members	Permanent
Subsidiary Expense Ledgers	Permanent
Unclaimed Property Report	Permanent
Beneficiary designation cards (insurance)	Permanent
Borrower insurance claims (paid)	6 years
Credit Disability Insurance Report	4 years
Creditor Disability Insurance claims paid	6 years
Group Insurance Deduction Authorization	4 years after closed
Life savings Insurance claims paid	6 years
Loan protection Insurance Reports	4 years

Member Loan Doc	Retention Period
Adverse Action Notice	25 months unless examination for violation exists then until final disposition of violation
Appraisals on Real Estate	25 months after notice of action taken
Approved Loan Application (including monitoring information, information used in evaluating application)	25 months after payoff *** 6 years recommended
Billing Dispute	2 years following settlement of dispute
Billing error notice	2 years
Closing Disclosure (and all related documents)	5 years after consummation
Consumer Leasing Disclosures	2 years
Credit Reports	3 years following the date on which an offer of credit is made
Denied Loan Applications (including monitoring information, information used in evaluating application)	25 months after application received
Dept of Motor Vehicles documents	4 years after loan payoff
Disclosures	2 years after loan payoff
Equal Credit Opportunity Act documentation	25 months
Escrow Account Documents	5 years following when the servicer last serviced the escrow account
Escrow Cancellation Notice (Escrow Closing Notice)	2 years after disclosure is provided
Fair Credit Reporting Act (evidence of compliance, credit worthiness criteria, requirements for furnishing collateral as condition of loan)	Information obtained for use in making offers of credit or insurance not initiated by the member - 3 years
Good faith estimate of settlement (RESPA)	3 years from Settlement date
HMDA Loan Application Register	3 years
HMDA Mortgage Loan disclosure documents	5 years from report date
HUD-1 and HUD-1A	5 years from settlement date

Individual loan ledger	Permanent
Intent to proceed	2 years after action is taken
Interest Refund payment record	6 years
Loan Estimate	3 years after consummation
Loans	6 years after loan payoff
Open end request vouchers	4 years after loan payoff
Real Estate Loan Documents	4 years after loan payoff
Rejected, withdrawn or incomplete loan application	25 months from date CU notifies applicant of action on application or of incompleteness
Report of loans drawn over credit limit	2 audit cycles
Report of new loans	2 audit cycles
RESPA member disclosures	1 year after mortgage discharge or sale to another servicer
RESPA Affiliated Business disclosure	5 years
Sample TILA disclosures for HELOC and ARM	2 years
Statement of purpose for loans over \$10,000	5 years
Transfer of Servicing Rights Disclosure	5 years following settlement

Accounting/Operations	Retention Period
Check register	6 years
CU checks	7 years
Member drafts cancelled	6 years
Member drafts paid	5 years
Monetary instrument purchase log (TR 90-06)	5 years
Money orders or instruments drawn on CU	7 years
Voided CU checks	4 years
Voided Money orders	4 years
Record of robberies, burglaries and non-employee larcenies attempted or committed	Permanent
Declaration of Forgery	6 years
Blocked property, accounts and transferred funds report	5 years after unblocked
Annual Report of Blocked Property	5 years
Customer Identification program (including verification of beneficial owners for legal	5 years after record is made

entities) records of discrepancies in identification information and resolution methods and results	
Legal entity beneficial owner identification records	5 years after the date the account is closed
Exemption Master List (Bank Security Act Reporting)	5 years after most recent change is made
Exemption Statement (Bank Security Act Reporting)	5 years after most recent change is made
International Transportation Report (Form 4790)	5 years

Membership Doc	Retention Period
Authorization for share to loan transfer	4 years after loan payoff
Beneficiary Designation Cards	Permanent
Certificates of Deposit	6 years after maturity
Closed Account Report	Permanent
Customer Identification program documents	5 years after account closed or, for credit cards 5 years after account closed or dormant
Daily Overdraft Reports	1 year following audit
Deceased Member Documentation	Permanent
Deposit slips (cash transactions over \$100)	5 years
Expedited Funds Availability notices and disclosures including evidence of procedures reasonably ensuring receipt	2 years
Liens (federal or state tax, judicial)	7 years
Notice of CU invocation of statutory exception to funds availability schedule for check holds	2 years or, if under investigation or per regulatory agency, after final disposition of matter
Records to reconstruct a share draft account or trace a share draft or check over \$100	5 years
Remote banking notices and disclosures including evidence of procedures reasonably ensuring receipt	2 years
Signature Guarantees	6 years
Taxpayer Identification and Certification	Permanent
Taxpayer Identification numbers for all having an interest in a CD	5 years after account closed
Truth in Lending compliance documentation	2 years after date disclosure is required to be made or

	action is required to be taken
Truth in Savings compliance documentation including advertising, disclosures, rate schedule, maturity notice and renewal certification agreement	2 years after date disclosures are to be made or action is required to be taken

Administration	Retention Period
Correspondence	6 years after tax due
Employer's Annual Federal Unemployment Tax Return (Form 940)	6 years following tax year
Employer's Quarterly Contribution Report	6 years following tax year
Employer's Quarterly Federal Tax Return (Form 941)	6 years following tax year
Magnetic Media Reports (tax related)	6 years following tax year
Mortgage Interest (Form 1098)	6 years following tax year
Reconciliation of Income Withheld from Wages (Form W-3)	6 years following tax year
Sales and Use Tax records	6 years following tax year
Social Security Tax records	6 years following tax year
Tax Bills	6 years following tax year
Tax Statements	6 years following tax year
Unemployment Tax Records	6 years following tax year
US Information Return (Form 1096)	6 years following tax year
US Information Return (form 1099 reporting income paid)	6 years following tax year
Wage and Tax Statement (Form W-2)	6 years following tax year

Policy Review

The Board of Directors and Records Retention Policy will be reviewed and updated by the Board of Directors as needed on an annual basis.