# 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> <li>Charter</li> <li>Bylaws and amendments</li> <li>Certificate of share insurance</li> <li>Certificate or licenses to operate various government programs</li> <li>Minutes of meetings (annual shareholders meetings, board of directors, credit committee, and supervisory committee)</li> <li>Minutes of Special Membership meetings</li> <li>Supervisory committee annual audit</li> <li>Supervisory committee records of member account verification</li> <li>Abandoned property (escheat reports until payment to state)</li> <li>Records preservation program and list of records destroyed</li> <li>Copy of each financial report NCUA form 5300 or equivalent</li> <li>Credit Union Profile Report</li> <li>NCUA Form 4501 or equivalent and or state's credit union department at the end of each quarter</li> <li>NCUA examination reports</li> <li>Paid bond claims</li> </ul>	Permanent
<ul> <li>Share and Loan balances for all members account</li> <li>Financial report listing all of the institution assets and liabilities</li> <li>Bank reconcilements</li> <li>Listing of credit union's financial institutions, insurance, policies, and investments</li> <li>Audit Reports and Record of account verification</li> <li>General Ledger</li> <li>Journal and Cash Record and EDP daily proof listing</li> <li>Dormant accounts listing</li> <li>Personnel Affirmative action plans/EEOC</li> <li>Off premises record preservation log</li> </ul>	Permanent with on and off site back-ups
Court orders	7 years
Powers of Attorney	6 years after account closed
<ul> <li>ATM Network Report/ Activity or Transaction Report</li> </ul>	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
<ul> <li>Bond(premium receipts and declaration page)</li> </ul>	Permanent
Insurance policies	6 years
Insurance coverage report	6 years
Personnel records	6 years after termination
<ul> <li>Application and resumes approved</li> </ul>	3 years
Application and resumes declined	6 years
Personnel attendance records	3 years
<ul> <li>Safe deposit box access tickets</li> </ul>	2 years
<ul> <li>Canceled signature cards for safety deposit boxes</li> </ul>	2 years after close
<ul> <li>Copies of rent receipts (safety deposit boxes)</li> </ul>	2 years
Leases or contracts, vendor closed accounts	2 years after close
Correspondence	2 years after close
Forced entry records	6 years
<ul> <li>Records and/or contents of drilled safety deposit boxes</li> </ul>	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
<ul> <li>Evidence of Reg. B compliance</li> <li>Applications, supporting information and required notifications (adverse action notices &amp; ECOA notice)</li> <li>Pre- screened solicitations (text &amp; criteria)</li> <li>Written compliances alleging violations of ECOA</li> <li>Self-tests information related to Fair Lending</li> <li>Right to Appraisal Notices/ waivers of that right</li> </ul>	25 months ( 12 months for business credit over \$1 million gross revenue)

Evidence of Reg. E compliance	
EFT error resolution documents (logs,	
spreadsheets, memos, etc.)	2 years from date of notice
Error- related documentation (notice of	of error
error from sender support documentation,	or ciroi
investigation)	
Wire Remittance Pre-payment Disclosure,	
receipt disclosure, or combined disclosure	5 years
Change in terms notice	3 years
Evidence of Reg. Z compliance	
Applications, support materials     TILA disclosures (initial % closing)	
TILA disclosures (initial & closing)	
New Loan Estimate Form  New Clasing Displaying	
New Closing Disclosure     Dight of Regission forms	Every
Right of Rescission forms  Fidence of compliance with requirements	5 years
Evidence of compliance with requirements  A solution and the state of the stat	
regarding periodic statements	
Copies of advertisements (including	
transcripts of non-print media)	
Copies of marketing materials used by the	
institution	
Evidence of Reg. CC compliance	
Evidence of compliance with funds	2 years
availability, notices, and other aspects with	
its procedures	
NCUA Part 707 Compliance with Truth in	
Saving Act	
Must be able to show established	2 years
procedures for paying interest/dividends.	
Rate and balance information must be	
sufficient to verify interest/dividends paid on	
accounts (samples disclosures needed)	
Evidence of Reg. C compliance (HMDA)	
<ul> <li>Complete register (LAR) and modified</li> </ul>	3 years
HMDA-LAR for public	
Public disclosure statement	5 years
Regulation V:Evidence of Fair Credit	
Reporting Act compliance	3 years
<ul> <li>Pre-approved/pre-screened credit offers</li> </ul>	
(criteria, requirements for collateral, text)	

Evidence of Reg. X (RESPA) compliance	
HUD-1 Good Faith Estimate	
HUD-1A Settlement form	
New Loan Estimate Form	
New Closing Disclosure	5 years (longer for items
<ul> <li>Applications, support information</li> </ul>	under investigation and/or
Documents related to kickbacks and unearned	dispute)
	dispute)
fees retention	
Affiliated Business Arrangement documents     Somiting Displaying Statement	
Servicing Disclosure Statement     Poserd Kooping for Escrew Assounts	
Record Keeping for Escrow Accounts	
BSA Common Transportion Remarks	
Currency Transaction Reports	
CTR exemptions records	F
Large currency transaction forms	5 years
Correspondence for law enforcement or other	
agency	
Member Identification Program (CIP)	
Suspicious Activity Report and supporting	5 years from date of report
documentation	(up to 10 years for items
	under investigation)
OFAC	_
Office of Foreign Assets Control Records of	5 years
Compliance	
National Flood Insurance Act	
Flood Hazard Determination forms	Life of the loan
Evidence of flood insurance if required	
Notices of force-placed flood insurance	
Regulation D: Reserve Requirements for	_
Depository Institutions	1 exam cycle
Daily Reserve Calculation	
	FI must submit and keep
	current (within 30 days)
Regulation G&H SAFE Mortgage Licensing Act	changes in information on
	Mortgage Loan Originators
	on the NMLS Registry
Regulation M: Consumer Leasing	
<ul> <li>Advertising and alternative disclosure</li> </ul>	2 years
(merchandise tags) relative to consumer	
leasing	
Regulation P: Privacy of Consumer Financial	Evidence of procedures
Information	recommended for one
	exam cycle

Electronic Signatures in Global and National     Commerce (E-SIGN Act)              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)     Loan documentation and work papers for any credit that has been designated under the SCRA for protection	Life of the loan
<ul> <li>Homeowners Protection Act (HOPA)</li> <li>PMI disclosures</li> <li>Annual notice of right to cancel PMI</li> </ul>	Life of the loan
<ul> <li>Fair Housing Act</li> <li>All advertising and marketing is required to have equal housing disclosure or Fair Housing logotype</li> </ul>	1 exam cycle
<ul> <li>Ability to Repay (mortgage rules)</li> <li>Evidence of efforts to determine income, assets, and other Ability to Repay factors</li> </ul>	Evidence of compliance (3 years)
<ul> <li>HOEPA Rule (mortgage rules)</li> <li>List of housing counseling agencies that meets the summary of data instructions for Housing Counseling Agency</li> </ul>	Must have list available for all federal-related mortgage applicants
<ul> <li>Loan Originator Rule (mortgage rules)</li> <li>Records of all compensation paid loan originators</li> <li>Loan Originators compensation agreements or contracts</li> </ul>	3 years after of the date of each receipt or payment

Mortgage Servicing Rules (Small Servicing Exemption may apply)	Retention Period
<ul><li>Mortgage Servicing File</li><li>Schedule of transactions, instruments,</li></ul>	
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
<ul><li>Prompt Payment, Crediting, and Statements</li><li>Written request and evidence of compliance</li></ul>	1 exam cycle
Force-placed insurance	Life of the loan
<ul><li>Error resolution and info request</li><li>Evidence of compliance</li></ul>	Must recognize request within 5 business days and

	respond in 30 (keep a log)
Early intervention with delinquent borrowers	
Disclosure	Keep copies of notices
• Log	with loan file.
Training	<b>Small Service Exemption</b>
Evidence of compliance	•
Continuity of contact with delinquent	Keep copies of notices
borrowers	with loan file.
	<b>Small Service Exemption</b>
Loss Mitigation Procedures	Keep copies of notices
<ul> <li>Evidence of compliance</li> </ul>	with loan file (keep at
Tracking	least 1 year after
Loss mitigation applications	discharge date)
	<b>Small Service Exemption</b>
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'	5 years
accounts	
Membership application/Account agreement	Permanent/Until
	superseded
Withdrawals	5 years
Deposits	5 years
E- Journal	1 year
Trial balances, automated or non-automated	
If statement or account history retained	Optional
If no alternate record	5 years
Form 1099	3 years
1099 listing, summary	
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	Loan is paid in full or
vehicle lien	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,	Loan is paid in full
etc.	
Security agreement for property held by the credit	Loan is paid in full and
union	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,	Loan is paid in full or until
insurance policies, jewelry, etc.)	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	Loan is paid in full
financial statements	
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	2 years after maturity or
securities)	sale

<b>Collections Documents</b>	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	F
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	Rentention 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	-
, , , , , , , , , , , , , , , , , , , ,	are to be made or action is
notice and renewal certification agreement	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.