**Office of Examination and Insurance** 



# Proposed Rule Part 702

# January 23, 2014

### **Proposed Risk-Based Capital Ratio**

### Capital Component Numerator

Risk-Based Capital Ratio

### Risk-Weighted Assets Denominator

Rounded to two decimal places

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# **Proposed Risk-Based Capital Ratio**

### **Capital Component Numerator**

| Additions   | Deductions  |
|---|---|
| Undivided Earnings (includes any regular reserve)                   | NCUSIF Deposit  |
| Appropriations for Non-conforming<br>Investments                    | Goodwill  |
| Other Reserves  | Other Intangible Assets   |
| Equity Acquired in Merger   | Identified losses not reflected as<br>adjustments to components of the risk-<br>based numerator |
| Net Income  |   |
| Allowance for Loan and Lease Loss (limited to 1.25% of risk assets) |   |
| Secondary Capital (included in net worth)                           |   |
| 208 Assistance (included in net worth)                              |   |

# **Proposed Risk-Based Capital Ratio**

### **Risk-Weighted Assets Denominator**

| Additions   | Deductions  |
|---|---|
| Risk Weighted   |   |
| Investments   | NCUSIF Deposit  |
| Consumer Loans  | Goodwill  |
| Delinquent Loans  | Other Intangible Assets   |
| Member Business Loans (MBLs)                                    | Identified losses not reflected as<br>adjustments to components of the risk-<br>based numerator |
| Current 1 <sup>st</sup> Mortgage Loans                          |   |
| Other RE loans and Delinquent 1 <sup>st</sup><br>Mortgage Loans |   |
| All Other Assets  |   |
| Off-Balance Sheet Assets  |   |



### **Summary of Risk-Weights**

| Asset  | Proposed Risk-Weight  |  |
|--|---|--|
| Cash on hand<br>NCUA issued guaranteed notes<br>Direct, unconditional U.S Government obligations | 0%<br>0%<br>0%  |  |
| Cash on deposit<br>Cash equivalents  | 20%<br>20%  |  |
| Investments  | WAL 0-1 yr 20%<br>WAL 1-3 yr 50%<br>WAL 3-5 yr 75%<br>WAL 5-10 yr 150%<br>WAL 10+ yr 200% |  |
| Corporate credit union perpetual capital   | 200%  |  |
| Consumer loans   | 75%   |  |
| Non-Gov. student loans   | 100%  |  |
| Delinquent Consumer loans  | 150%  |  |



### **Summary of Risk-Weights**

| Asset   | Proposed Risk-Weight  |
|---|---|
| MBLs  | <15% Assets – 100%<br>15% to 25% - 150%<br>>25% Assets – 200% |
| Current 1 <sup>st</sup> Mortgage                  | < 25% Assets – 50%<br>25%-35% - 75%<br>>35% Assets – 100%     |
| Junior Real Estate and Delinquent 1 <sup>st</sup> | <10% Assets – 100%<br>10-20% - 125%<br>>20% - 150%            |
| Mortgage Servicing<br>CUSO Equity Investment      | 250%<br>250%  |
| Other Assets                                      | 100%  |

# **Summary of Risk-Weights**

| Off-Balance Sheet Item                                   | Conversion<br>Factor | Risk-Weight | Effective Risk-<br>weight |
|--|----------------------|-------------|---------------------------|
| Unfunded commitments for business loans                  | 75%                  | 100%        | 75%                       |
| MBLs sold with recourse                                  | 75%                  | 100%        | 75%                       |
| First mortgage RE loans sold with recourse               | 75%                  | 50%         | 37.5%                     |
| Other RE loans sold with recourse                        | 75%                  | 100%        | 15%                       |
| Non-federally guaranteed student loan sold with recourse | 75%                  | 100%        | 75%                       |
| All other loans sold with recourse                       | 75%                  | 75%         | 56.25%                    |
| Total unfunded commitments for non-business loans        | 10%                  | 75%         | 7.5%                      |

# **Capital Categories**

|   | Current NCUA<br>Measure   | Proposed NCUA<br>Measure | And subject to following condition(s)  |
|---|---|--------------------------|--|
| Well Capitalized<br>Net worth ratio (NWR)<br>Risk-based capital measure*          | 7%+<br>RBNW>NWR   | 7%+<br>10.5%+            | Must pass both net worth<br>and risk-based capital<br>ratio  |
| Adequately Capitalized<br>Net worth ratio/Leverage<br>Risk-based capital measure* | 6%-6.99%<br>RBNW>NWR  | 6%-6.99%<br>8%-10.49%    | Must pass both net worth<br>and risk-based capital<br>ratio  |
| Undercapitalized<br>Net worth ratio<br>Risk-based capital measure*                | 4%-5.99%<br>RBNW <nwr< td=""><td>4%-5.99%<br/>&lt; 8%</td><td>Must pass both net worth<br/>and risk-based capital<br/>ratio</td></nwr<> | 4%-5.99%<br>< 8%         | Must pass both net worth<br>and risk-based capital<br>ratio  |
| Significantly Undercapitalized<br>Net worth ratio                                 | 2%-3.99%  | 2%-3.99%                 | Or if undercapitalized at <5% net<br>worth and fails to timely submit or<br>materially implement an approved<br>net worth restoration plan |
| Critically Undercapitalized<br>Net worth ratio                                    | < 2%  | < 2%                     | None   |

\*Applies only to credit unions with quarter-end total assets exceeding \$50 million. (RBNW – risk-based net worth requirement)



### **Impact Analysis**

| Aggregate Risk-Based Measure  | As of June 30, 2013 |
|---|---------------------|
| # CU over \$50 million in Assets  | 2,237               |
| Aggregate Risk-Based Measure  | 14.6%               |
| Average Risk-Based Measure  | 15.7%               |
| Aggregate Risk Assets to Total Assets   | 69.3%               |
| Average Risk Assets to Total Assets   | 67.6%               |
| # FICUs which would be reclassified<br>from well-capitalized to<br>undercapitalized       | 10                  |
| # FICUs which would be reclassified<br>from well-capitalized to adequately<br>capitalized | 189                 |



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Credit Union Locator

### **Calculator for Proposed Risk-Based Capital Rule**

The National Credit Union Administration issued a Notice of Proposed Rulemaking to revise and replace the agency's current risk-based capital requirements for credit unions with assets greater than \$50 million.

#### **Credit Union Lookup**

The proposed rule includes implementation of a new method for computing the risk-based capital ratio that is more consistent with the approach used by the other banking agencies. It also includes revised risk weights for many asset classifications and a higher capital requirement for credit unions with concentrations of assets in real estate loans or member business loans. The effective date of these changes is projected to occur 12 to 18 months after NCUA issues the final rule. **Read More ...** 

| Show Risk-Based Capital Read Full Proposed Rule |
|---|

#### Assets

### \$235,808,502

The proposed risk-based capital applies to credit unions with assets greater than \$50 million. Small credit unions, under \$50 million in assets, are exempt from the proposed risk-based capital rule; however, for informational purposes, the calculator is available for all credit unions.

### **Current Regulation**

### **Proposed Regulation**

As of 6/30/2013

| $\star$ Well Capitalized     |        |
|------------------------------|--------|
| Net Worth                    | 11.89% |
| Risk-Based Net Worth Ratio   | 4.67%  |
| Alternative RBNW Calculation | 0.00%  |

Applies to credit unions with assets greater than \$50 million.

| $\star$ Well Capitalized     |        |
|------------------------------|--------|
| Net Worth                    | 11.89% |
| Risk-Based Capital Ratio     | 18.90% |
| Alternative RBNW Calculation | N/A    |

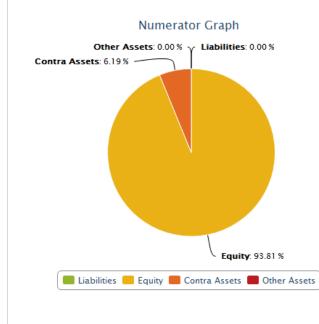
| Proposed Risk-Based Capit  | al Calculation   |               |
|--|--|---------------|
| Numerator<br>Denominator   | \$27,988,886<br>\$148,094,611 = <b>18.</b>   | 90%           |
| Numerator  |  |               |
| order to capture all of the material risks, we included  | ns largely the components of a credit union's net worth. In<br>some additional equity items and subtracted other balance<br>reflects a measure of amounts available to cover losses. | \$27,988,886  |
|  |  | View Details  |
| Denominator  |  |               |
| The proposal includes a calculation of a credit union<br>sheet exposures. A credit union determines its total ris<br>(1) its risk-weighted assets, minus<br>(2) goodwill and other intangibles, and minus<br>(3) the National Credit Union Share Insurance Fund de |  | \$148,094,611 |
|  |  | View Details  |

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#### Numerator

The numerator for the risk-based capital ratio remains largely the components of a credit union's net worth. In order to capture all of the material risks, we included some additional equity items and subtracted other balance sheet items. The goal is to achieve a numerator that reflects a measure of amounts available to cover losses.

#### \$27,988,886



| Numerator Formula 🕼                    | Call Rep  | port Accoun | t Dollars  |
|--|-----------|-------------|------------|
| —Liabilities                           |           |             | 0          |
| Subordinated Debt included in Net V    | /orth     | Acct_925A2  | 0          |
| Subordinated Debt (non low income 208) | and non-  | Acct_867B2  | 0          |
| —Equity                                |           | 2           | 8,043,222  |
| Undivided Earnings                     |           | Acct_940    | 25,520,740 |
| Regular Reserve                        |           | Acct_931    | 2,522,482  |
| Appropriations for Non-Conforming In   | vestments | Acct_668    | 0          |
| Other Reserves                         |           | Acct_658    | 0          |
| Equity Acquired in Merger              |           | Acct_658A   | 0          |
| Net Income                             |           | Acct_602    | 0          |
| + ontra Assets                         |           |             | 1,851,183  |
| +€ ther Assets                         |           | ('          | 1,905,519) |

Click on the "+" sign to expand each section

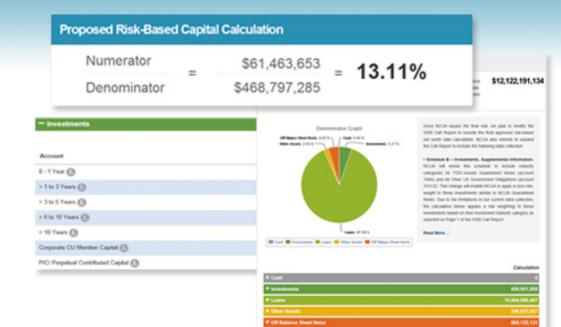
# To view the denominator detail, click on the "+" sign to expand each section.

|                                      |            |                            | Calculation |
|--------------------------------------|------------|----------------------------|-------------|
| +Cash                                |            |                            | 0           |
| -Investments                         |            |                            | 25,534,394  |
| Account                              | Value      | Proposed<br>Risk<br>Weight | Calculation |
| 0 - 1 Year 🚯                         | 37,988,048 | 0.20                       | 7,597,610   |
| > 1 to 3 Years 👧                     | 19,820,718 | 0.50                       | 9,910,359   |
| > 3 to 5 Years 👧                     | 6,224,041  | 0.75                       | 4,668,031   |
| > 5 to 10 Years 🚯                    | 2,077,528  | 1.50                       | 3,116,292   |
| > 10 Years 🕼                         | 0          | 2.00                       | 0           |
| Corporate CU Member Capital 🕼        | 242,102    | 1.00                       | 242,102     |
| PIC/ Perpetual Contributed Capital 👧 | 0          | 2.00                       | 0           |
| +Loans                               |            |                            | 114,152,715 |
| +Other Assets                        |            |                            | 4,125,239   |
| +Off Balance Sheet Items             |            |                            | 4,282,263   |

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Get a better understanding of NCUA's Capital Adequacy Rule with our online calculator. **rbnw.ncua.gov** 



NCUA