

**National Credit Union Administration**  
**Justification for Non-substantive/not material change**

**Capital Planning and Stress Testing**  
**12 CFR Part 702, Subpart E**  
**OMB No. 3133-0199**

NCUA made non-substantive changes to the reporting templates to correct calculation errors related to automatic data validations, as well as minor wording and formatting changes.

A list of changes made to the reporting templates are as follows:

1. Results Reporting Template – Both SST and Internal Capital Planning
  - a. Corrected spelling mistakes on the validation, Balance Sheet and Data Dictionary tabs.
  - b. Enabled searchable filters for the dictionary and validation tabs.
  - c. Fixed erroneous validation errors for Loan Details and Current Credit Loss Expense.
  - d. Added validation check to make sure change in current quarter earnings and reserves are equal to net income.
  - e. Removed white fill and imposed light blue to better distinguish input areas.
  - f. Removed users' ability to alter formatting.
  - g. Imposed consistent formatting between tabs.
  
2. Results Reporting Template – Internal Capital Planning Only
  - a. Expanded available time horizon to include full 12 quarters (3 years) for balance sheet, income statement and net interest income worksheets and 16 quarters (4 years) for loan details worksheet.
  - b. Expanded validation checks to 12 quarters to accommodate changes made in 2(a) above.

NCUA had one of our credit unions conduct user acceptance testing (UAT) to confirm changes remediated any errors in the validation calculations. UAT confirmed these non-substantive changes will not add any additional burden to credit unions using the templates.