

JULY 2025

Loan Data Reporting

Consultation Summary Report

BCFSA 

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Introduction

On November 9, 2023, B.C. Financial Services Authority (“BCFSA”) launched a consultation on proposed loan data reporting (“LDR”) requirements to establish and implement the LDR as a regulatory filing for B.C. credit unions. The requirements include quarterly reporting of granular loans and leases data of the credit unions’ personal and commercial loan and lease portfolios.

Collecting and analyzing relevant data with the appropriate level of granularity is an essential component of BCFSA’s risk-based supervision. Granular data enables effective and efficient risk monitoring and assessment to fulfill BCFSA’s supervisory mandate.

Additionally, the LDR aligns with other regulators’ initiatives to focus on granular data collection to improve risk assessment in support of financial institutions’ regulation and supervision. Collecting loans and leases data as part of scheduled filings streamlines regulatory reporting and eliminates additional ad hoc requests for this information.

BACKGROUND

In 2019, BCFSA (previously the Financial Institutions Commission) issued a report on [Risk Data Aggregation and Reporting Principles](#) to assist credit unions in adequately capturing the credit, liquidity, and treasury risks associated with their operations. The report considered best practices for risk data collection and reporting by credit unions and set data quality expectations. In addition, the report identified appropriate data fields (loan attributes) to monitor risks and established common field descriptions that lay the foundation of the proposed loan data reporting requirements.

Currently, BCFSA requests granular residential mortgage data from credit unions on a quarterly basis. This includes loan level data on newly originated and renewed residential mortgages that enables BCFSA to assess the credit unions’ underwriting standards and allows for in-depth risk assessment of new, refinanced, and renewed residential mortgages. Furthermore, BCFSA requests annual residential mortgage portfolio and commercial loan portfolio data for lending risk assessments and to quantify the proposed capital risk-weightings for credit risk, as part of the [Capital Modernization Project](#). BCFSA regularly shares with credit unions the high-level results from the analysis of the collected loan data.

The LDR requirements were built from and will replace the current residential mortgage and commercial loan data requests to enhance and streamline regulatory reporting. Such current data requests cover about 60 to 70 per cent of the data fields in the LDR.

WHY IS THE LDR IMPORTANT TO CREDIT UNIONS AND BCFSA?

Regular reporting of granular loans and leases data provides a more comprehensive picture of a credit union’s lending operations and offers the following benefits to credit unions and BCFSA:

- Ensures that appropriate data and its quality is maintained, reported, and monitored by credit unions in support of their risk management and reporting practices;

- Enables BCFSA to monitor and identify possible vulnerabilities and emerging risks relevant to credit unions, such as credit risk, interest rate risk, and liquidity risks;
- Informs BCFSA's principles-based approach to guidelines and forward-looking approach to supervision;
- Supports the tailored-to-B.C. credit risk approach in the proposed capital modernization framework;
- Streamlines regulatory reporting, as the LDR will replace the quarterly Residential Mortgage Loans Report ("RMLR") filings, the quarterly information request on residential mortgage underwriting standards, the annual residential mortgage portfolio and commercial loan portfolio data requests, and allows proportionate application of the LDR requirements to the credit union's size, complexity, and risk profile.

In addition, BCFSA will continue to share with credit unions high-level results from the analysis of the collected loan data.

Consultation Process Overview

In November 2023, BCFSA engaged credit unions and other interested stakeholders seeking feedback on the draft LDR requirements in two stages. Based on initial comments, BCFSA extended the LDR consultation to offer additional time for credit unions to provide feedback. The LDR consultation ended in December 2024. Further details on the LDR consultation are posted on [BCFSA's website](#).

LDR Stage 1 – written feedback (November 9, 2023 - March 18, 2024)

BCFSA invited stakeholders to provide initial comments on the draft LDR requirements and the proposed implementation timeline. BCFSA received feedback from six credit unions and consolidated credit union feedback from the Canadian Credit Union Association ("CCUA"). The initial feedback provided the foundation for the next stage of the consultation.

LDR Stage 2 – technical working group (September 19 - December 31, 2024)

BCFSA convened the LDR Technical Working Group ("TWG") with representatives from 12 credit unions and CCUA to discuss the initial feedback and any issues or challenges credit unions may have with the proposed reporting requirements and implementation timeline. BCFSA held seven TWG sessions in 2024 to discuss the data field specifications, finalize the LDR requirements based on credit unions' feedback, and seek the TWG's feedback about proportional reporting and the implementation timeline of the LDR. Then, BCFSA held another closing session in April 2025, to review the changes in the final LDR requirements with the TWG members.

Summary of Feedback

BCFSA received extensive feedback from stakeholders and conducted valuable discussions with the TWG that shaped the final LDR requirements. BCFSA thanks all stakeholders who provided comments and members of the TWG for their time and contribution during the working group sessions.

Overall feedback from credit unions recognized the importance of granular data capture, reporting and data analysis as best practice in risk management and supported the introduction of the LDR.

Some of the significant themes from the LDR consultation feedback highlighted the following concerns from credit unions:

- Additional IT costs and resources needed for system and process improvements to capture and report the LDR data;
- Potential impacts of the LDR on credit unions’ underwriting processes;
- Privacy and security concerns — credit unions sought assurance on compliance with privacy legislation and data protection measures;
- Sufficient time to implement the necessary improvements for LDR reporting and a more proportional approach based on risk materiality; and
- Granularity of the LDR and specific data fields in the LDR requirements.

BCFSA recognizes that credit unions need time and resources to implement the LDR requirements and has extended the implementation timeline over two years, adopting a phased approach to allow credit unions sufficient time to comply with the reporting requirements. Additionally, BCFSA adjusted the requirements following a proportional approach by credit unions’ asset sizes and loan types, and made changes to the data fields to ensure the LDR includes appropriate and relevant data fields for credit unions’ own risk management and BCFSA’s regulatory oversight.

After a comprehensive review, BCFSA considered all feedback and listed its responses to the general stakeholder feedback by themes in the following table. In response to stakeholder feedback on specific data fields, BCFSA updated, clarified, or removed data fields and listed its responses in the stakeholder feedback table in [Appendix A](#). The list of data fields that were removed from the proposed requirements based on feedback is in [Appendix B](#).

STAKEHOLDER FEEDBACK TABLE – GENERAL FEEDBACK

Summary of Issue/Comment	BCFSA Response
<p>Theme: Additional IT Cost and Resources</p> <p>Credit unions noted that implementing the LDR requires significant enhancements to credit unions’ current banking and loan origination systems and updating these systems will take time and resources. In addition,</p>	<p>BCFSA recognizes that credit unions may need to enhance their systems to capture the required data for LDR reporting. During the consultation, BCFSA aimed to ensure the LDR data is adequate for credit unions’</p>

Summary of Issue/Comment	BCFSA Response
<p>capturing data for LDR reporting requires staff training and updating credit unions' lending processes and procedures. Credit unions asked for sufficient time to plan and budget for the required system changes.</p> <p>Some credit unions may need to implement new loan origination systems, especially for commercial files which are largely paper based, but such investment is not attainable for smaller credit unions. They noted that without system improvements, manual reporting would be required and that is not sustainable.</p>	<p>own risk assessment as well as for BCFSA's regulatory oversight, so that benefits outweigh implementation cost.</p> <p>BCFSA allows credit unions sufficient time for the implementation of LDR by following a phased-in approach over two years, as credit unions improve their data capture and reporting capabilities.</p> <p>In addition, BCFSA requires less data capture from smaller credit unions to ensure a proportionate approach (considering credit union's size, complexity, and risk profile) continues to be followed in regulatory reporting, such as the LDR.</p> <p>BCFSA expects that over time, credit unions will have all of their loan data digitalized and readily available for their own risk management and reporting purposes, as well as for reporting to BCFSA.</p>
<p>Theme: Impact on Credit Unions' Underwriting</p> <p>Credit unions commented that including additional data requirements in their loan application process impacts their underwriting and may result in business lost to other financial institutions with more streamlined loan application processes. They noted the importance that the LDR does not impose uncompetitive consequences when compared to other regulated financial institutions and fintech.</p>	<p>Granular loan level data is essential for the management of risks associated with credit unions' loans and leases portfolios. Its reporting is foundational for BCFSA's mandate to monitor the safety and soundness of individual credit unions and the stability of the system.</p> <p>During the consultation, BCFSA aimed to ensure the LDR requirements capture appropriate and relevant data fields that are needed for credit unions' own underwriting and ongoing risk monitoring and assessment.</p> <p>Other regulators, such as the Office of the Superintendent of Financial Institutions ("OSFI") and the Financial Services Regulatory Authority of Ontario ("FSRA"), also introduced initiatives for enhanced regulatory reporting that is based on granular transaction-level data collections. BCFSA has benchmarked the LDR data specifications against these reporting requirements.</p>

Summary of Issue/Comment	BCFSA Response
<p>Theme: Consultation Approach</p> <p>Credit unions commented on the LDR consultation approach and noted that they expect BCFSA to first inform credit unions about the policy framework or guideline that supports loan data collection. Then, invite credit unions to discuss the key components of the data request and credit unions' capabilities to provide the data, as opposed to prescribe detailed loan data collection before the consultation begins.</p>	<p>BCFSA leads various consultations with each of its regulated segments and tailors its approach to each consultation.</p> <p>Given that credit unions already submit most of the loan data in the current residential mortgage and commercial loan data requests, BCFSA chose to share the proposed reporting requirements with credit unions at the beginning of the consultation. During the consultation period, credit unions had opportunities to provide written as well as verbal feedback during working group sessions to discuss the proposal for potential adjustments before the final LDR requirements are issued and ready for implementation.</p> <p>Based on the consultation outcome and the number of changes made to the proposed reporting requirements, this approach worked well for the LDR consultation.</p> <p>Additionally, BCFSA has already established guidelines for credit unions that relate to the LDR and support loan data collection. BCFSA issued the Risk Data Aggregation and Reporting Principles (in 2019), the Residential Mortgage Underwriting Guideline (in 2015), and is in the process of issuing the Commercial Lending Guideline (Consultation on Draft Commercial Lending Guideline for B.C. credit unions BCFSA).</p>
<p>Theme: Link to Other BCFSA Consultations</p> <p>Credit unions noted the connection of the LDR to other ongoing BCFSA consultations, such as the Capital Modernization and the Natural Catastrophe and Climate Risk ("NCCR"). They asked BCFSA to align the data requirements with the timeline of these other related consultations.</p>	<p>BCFSA manages consultations with its regulated segments simultaneously and these are often intentionally related, to ensure that BCFSA and regulated entities consider all aspects of an initiative, such as guidance documents, reporting, etc.</p> <p>In the draft LDR, BCFSA proposed forward-looking data requirements to support upcoming changes to be introduced by the Capital Modernization Project BCFSA and the Consultation on Natural Catastrophes and Climate-Related Risks BCFSA. This is to encourage and help credit unions prepare for the upcoming changes, but BCFSA recognizes that</p>

Summary of Issue/Comment	BCFSA Response
	<p>consultation timelines may not align and adjusts the requirements accordingly.</p> <p>In response to feedback, BCFSA changed the scope of the LDR consultation and removed the natural catastrophe and climate risk data fields related to real estate collateral, such as property insurance coverage, greenhouse gas emissions, and energy consumption. Out-of-scope data fields are listed in Appendix B. BCFSA will consult on these fields at a later date.</p> <p>Reporting requirements for data fields related to Capital Modernization, such as Total Debt Service (“TDS”) ratio and the Debt Service Coverage Ratio (“DSCR”) for capital reporting, are aligned with the revised timeline of the Capital Modernization Project.</p>
<p>Theme: Privacy and Data Security</p> <p>Credit unions expressed concern about the level of information being requested, including some identifiable personal information, and asked if the applicable privacy legislation allows for the capture and sharing of this level of details.</p> <p>Credit unions noted that some of the new data points being requested do not form part of the credit decision and they are concerned as to how privacy legislation would apply to them capturing and sharing information that falls outside the scope of the credit decision and providing it to a third party (such as BCFSA).</p> <p>Credit unions asked about BCFSA’s information security policy, including how long is the information kept at BCFSA and what assurance can credit unions get that the information is adequately managed throughout its lifecycle, including aspects of storage, access control and retention periods.</p>	<p>BCFSA takes the security and privacy of the data it collects seriously and continuously implements necessary controls, policies, and procedures to ensure appropriate handling, storage, and disposal of sensitive information.</p> <p>The <i>Financial Institutions Act</i> (“FIA”) provides BCFSA with the authority to collect information to meet its supervisory mandate. Collected granular loan data in the LDR may originate from credit unions’ lending operations but serves the purpose of risk monitoring and more proactive supervision and regulation, to enable BCFSA to make informed regulatory decisions.</p> <p>The <i>Freedom of Information and Protection of Privacy Act</i> (“FOIPPA”) authorizes BCFSA to collect personal information, and the <i>Personal Information Protection Act</i> (“PIPA”) authorizes businesses to disclose personal information where required or authorized by law, such as the FIA. FOIPPA authorizes BCFSA to collect personal information indirectly from a person, other than from the individual the information is about, because such collection is authorized under the FIA.</p> <p>BCFSA is required to protect the privacy and security of all data and information under its purview, as set out in FOIPPA. Once received, the credit union’s loan data is</p>

Summary of Issue/Comment	BCFSA Response
	<p>subject to BCFSA’s information management and confidentiality requirements, consistent with FOIPPA.</p> <p>FOIPPA requires that BCFSA prepare a privacy impact assessment (“PIA”) in connection with any new or significantly updated initiatives, including the LDR. The PIA ensures that BCFSA identifies any risks associated with collecting personal information, protects the privacy of personal information, and remains in compliance with FOIPPA.</p> <p>BCFSA manages records, including records containing personal information, using administrative and operational records classification systems (“ARCS/ORCS”) in accordance with the <i>Information Management Act</i> (“IMA”). At the end of the required retention period, BCFSA destroys documents and records following government standards designed to safeguard the confidentiality of personal and confidential information and to ensure obliteration.</p> <p>BCFSA has a robust digital security program and invests in maintaining and augmenting its security measures. BCFSA conducts regular security assessments by third parties to ensure compliance with industry standards.</p> <p>BCFSA accepts data through its secure Integrated Regulatory Information System (“IRIS”) Portal, using multi-factor authentication (“MFA”), where the data is encrypted in transit and at rest. Data is stored in a secure cloud-based environment hosted in Canada. BCFSA uses Microsoft cloud services which implement strong security controls and practices.</p> <p>BCFSA ensures appropriate data governance for the LDR data is in place to ensure effective management and use of the data for better decision-making, and the data is protected throughout its lifecycle. Access to LDR data will be restricted to a need-to-know basis (assigned based on user access profiles) and any personal identifiers will be masked.</p> <p>All BCFSA employees are subject to its Standards of Conduct Policy and receive privacy training after hiring, and during mandatory periodic updates.</p>

Summary of Issue/Comment	BCFSA Response
<p>Theme: Implementation Timeline</p> <p>Credit unions asked for sufficient time to implement the necessary system changes, and update processes and controls to ensure all data is properly captured and reported.</p> <p>Credit unions recommended a minimum of 6-12 months for the LDR implementation and phase-in over three years, with allowing longer implementation time periods for smaller credit unions.</p> <p>Credit unions asked for more flexibility in the implementation timeline, as the scope of data collection includes portfolio data and leases.</p>	<p>Credit unions are invited to read more about privacy at BCFSA on our website. Link: Privacy Policy BCFSA.</p> <p>Based on credit unions’ feedback, BCFSA deferred and extended the implementation timeline with a phased-in approach. This adjustment provides credit unions with additional time and allows them to gradually prepare for the LDR reporting.</p> <p>Credit unions implement the LDR requirements for reporting to BCFSA over two years and in two phases with one year apart:</p> <ul style="list-style-type: none"> • Phase 1 – Effective June 2026 <p>Credit unions begin reporting selected LDR data fields (subset of about 60-70% of all data fields) with quarterly frequency.</p> <ul style="list-style-type: none"> • Phase 2 – Effective June 2027 <p>Credit unions must report all data fields in the LDR applicable to their appropriate tiers based on asset sizes.</p> <p>The LDR reporting templates and instructions list the applicable phases and credit union tiers to each data field.</p>
<p>Theme: Proportional Reporting Requirements</p> <p>Credit unions suggested a more proportional approach based on risk materiality, including</p> <ul style="list-style-type: none"> • a tiered approach by credit union asset sizes (e.g., smaller CUs to submit a smaller data set); • varying requirements for less material segments of credit union’s loan portfolios based on size (e.g., report personal loans annually instead of quarterly); • a tiered approach by type of lending (e.g., less requirements for small business lending under \$250,000); and • reporting data on new loan originations quarterly versus portfolio data with less frequency. 	<p>BCFSA follows a risk-based approach to proportionality in its regulatory reporting requirements. For example, more data fields are required related to residential mortgages rather than other personal loans, as residential mortgages represent a more material portion of credit unions’ loan portfolios.</p> <p>Based on credit unions’ feedback, BCFSA adopted a proportional approach with different LDR requirements by credit unions’ asset sizes (four tiers) and by loan type (real estate (“RE”) secured and non-RE secured):</p> <ul style="list-style-type: none"> • Tier 1 credit unions >\$5 billion in total assets

Summary of Issue/Comment	BCFSA Response
	<p>Report all data fields for all RE secured and non-RE secured personal and commercial loans and leases (including defaults).</p> <ul style="list-style-type: none"> • Tier 2 - 4 credit unions ≤ \$5 billion in total assets <ul style="list-style-type: none"> ○ Report data fields applicable by credit union tiers (i.e., Tier 2 - 4) for all RE secured personal and commercial loans (including defaults); ○ Report a subset of data fields for defaulted non-RE secured personal and commercial loans and leases; and ○ Reporting other (not defaulted) non-RE secured loans and leases are not required. <p>Credit union tiers for LDR reporting:</p> <ul style="list-style-type: none"> • Tier 1 – Total assets are > \$5 billion • Tier 2 – Total assets are ≤ \$5 billion & > \$1 billion • Tier 3 – Total assets are ≤ \$1 billion & >\$300 million • Tier 4 – Total assets are ≤ \$300 million <p>The LDR reporting templates and instructions list the applicable phases and credit union tiers to each data field.</p>
<p>Theme: Granularity of the LDR</p> <p>Credit unions expressed concern about the granularity of the LDR. They noted that fewer and more focused data fields would be more useful for risk assessment and regulatory oversight, while an overwhelming amount of data could obscure real risks and create unnecessary regulatory burden on credit unions.</p> <p>In addition, credit unions noted that many of the data fields enhance their risk management, but several have limited value-for-effort.</p>	<p>During the consultation, BCFSA aimed to ensure the LDR requirements are adequate and relevant for risk monitoring and assessment. After thorough review, BCFSA considered all feedback, including credit unions’ capabilities to collect and report the data, and weighed the risk associated with not collecting the data. Based on credit unions’ feedback, BCFSA updated, clarified, or removed data fields to adjust and finetune the final LDR requirements.</p> <p>BCFSA updated and clarified about 40-50 per cent and removed about 30-40 per cent of the proposed data fields. Stakeholder feedback on specific data fields and BCFSA’s responses are listed in the stakeholder</p>

Summary of Issue/Comment	BCFSA Response
	feedback table in Appendix A and removed data fields are listed in Appendix B .
Theme: Credit unions requested further clarification on the LDR reporting requirements, as follows:	
Credit unions asked further clarification on what is in scope for LDR reporting.	<p>Credit unions must report granular personal and commercial loans, lines of credit, and leases data (as outlined in the LDR reporting templates and instructions) quarterly and within 20 days of each quarter end.</p> <p>Outstanding credit card balances and unauthorized overdrafts of deposit accounts are not included in the reported data. Off balance sheet exposures, such as letters of credit, are not included in the LDR.</p>
Credit unions asked further clarification on reporting the LDR on a consolidated basis.	Credit unions must report the LDR on a consolidated basis and include loans and leases in the credit union's books and all of the credit union's subsidiaries' books. Accounts that are eliminated at consolidation (e.g., a subsidiary's line of credit account at the credit union) should not be reported.
Credit unions noted that some loan attributes in the LDR are currently not recorded in credit unions' systems, and they recommended that data should be captured and reported on a go-forward basis, rather than applied to existing loans.	Credit unions may begin reporting the LDR on a go-forward basis. BCFSA expects credit unions to capture the appropriate data fields for all new originations and update at renewal/refinance for existing loans and leases.
Smaller credit unions (Tier 4) noted that they need to budget for system improvements over several years and asked BCFSA to move some of the Phase 1 commercial data fields to Phase 2 for Tier 4 credit unions.	BCFSA revisited the LDR requirements for smaller credit unions (i.e., Tier 4) during the consultation and updated the minimum expectations for Phase 1 and 2.
Credit unions asked whether the LDR will replace the current quarterly and annual loan data requests.	Yes, the LDR immediately replaces the quarterly residential mortgage information requests and the annual residential mortgage portfolio and commercial loan portfolio data requests.
Credit union noted there is a mix of data reporting periods: point in time, as of the reporting date versus	Most data fields in the LDR are reported as of the reporting date (i.e., quarter-end) but some data fields capture transactional/flow data during the reporting period (i.e., during the reporting quarter between two

Summary of Issue/Comment	BCFSA Response
<p>flow data, during the reporting period and this may create unintended ambiguity.</p>	<p>quarter-ends). When transaction/flow data is required, that is clearly stated in the LDR reporting templates and instructions.</p>
<p>Credit unions asked further clarification on some data fields in the LDR that have a defined list of categories to select from.</p> <p>Credit unions asked whether they need to exactly match their reported data with BCFSA’s categories for each data field.</p> <p>Credit unions asked whether they need to make changes to the options available in their banking and/or loan origination systems to align the options with BCFSA’s reporting requirements.</p> <p>Credit unions noted that some categories do not align with the options available in their banking and/or loan origination systems and they need to map their data to match BCFSA’s categories. Additionally, loans may not clearly match the categories, and so assumptions may need to be made.</p>	<p>BCFSA refined the selection options for certain data fields to enhance clarity and streamline the submission of high-quality data. BCFSA expects credit unions to submit complete and high-quality data when they report the LDR.</p> <p>Credit unions must select and report the appropriate category where a defined list of categories is provided for a data field. Credit unions must exactly match to the listed categories for each data field.</p> <p>BCFSA recognizes that credit unions need to map their data to match BCFSA’s categories and they may need to make assumptions to select from the listed categories. The “Other” category is introduced where appropriate, to allow flexibility in circumstances where credit unions cannot map to existing categories.</p> <p>BCFSA will monitor the quality of data submitted, including the number of loans reported as “Other” category and may follow up with the credit union to further segregate what has been grouped into “Other”, by introducing new categories in the future, as lending categories change or new ones get introduced.</p> <p>Furthermore, credit unions do not need to make changes to their systems to align the options with BCFSA’s reporting requirements, and they may code the mapping to the appropriate LDR selections only when reporting to BCFSA.</p>
<p>Credit unions asked further clarification on data specifications for reporting selection from a numbered list of values (e.g., 1 - Yes, 2 - No).</p>	<p>Credit unions must report the leading number of the appropriate selection when a numbered list of values is provided for a data field. For example, for a list of “1 - Yes” or “2 - No”, report “1” as “Yes” and “2” for “No”.</p> <p>Same applies to the data fields in the LDR that have a defined list of categories to select from. Report the leading number (such as “1”, “2”, or “3”, etc.) of the appropriate category listed for a data field.</p>

Summary of Issue/Comment	BCFSA Response
<p>Credit unions asked further clarification on some data fields that require multiple items to be reported in one data field (e.g., postal codes when multiple properties are pledged as collateral for a loan).</p>	<p>When required and applicable to a data field, credit unions should report multiple items in one data field separated by semicolon (“;”). For example, when multiple properties are pledged as collateral for a loan, report all applicable postal codes separated by semicolon (“;”) in one data field.</p>
<p>Credit unions asked further clarification on what data validations will apply to the submitted LDR.</p>	<p>BCFSA will implement data validation checks in the LDR submissions. The following error type data validation rules are applied to the data to accept or reject the submission:</p> <ul style="list-style-type: none"> • Data type validations on all data fields. Credit unions must follow the required format for each data field, to avoid errors and rejected LDR submissions. Report dates in “YYYY-MM-DD” format and percentages in decimal format with four digits. • Blank or N/A validations on a subset of data fields. If applicable and noted as “If blank or N/A the record will be rejected” for a data field in the LDR reporting templates and instructions, that data field cannot be left blank or reported N/A for any records submitted. Credit unions must report these data fields to avoid errors and rejected LDR submissions. • Pre-defined category validations on a subset of data fields. If applicable and a defined list of categories is provided for a data field in the LDR reporting templates and instructions, the leading number (i.e., “1”, “2”, or “3”, etc.) of the appropriate category listed in the options must be reported to avoid errors and rejected submissions. This data validation only applies when the data field is not blank. <p>BCFSA expects data quality to improve over time and will increase the data validation rules in the LDR submissions accordingly.</p>

Consultation Outcomes and Next Steps

BCFSA thanks all stakeholders who took the time to participate in the consultation and provided comments.

Based on the consultation feedback, BCFSA made several adjustments to the data fields in the final LDR requirements, the proportional approach to reporting the LDR, and the phased-in timeline for implementation.

On July 15, 2025, BCFSA issued the LDR Regulatory Statement that outlines the reporting requirements effective June 1, 2026, and includes the LDR reporting templates and instructions. Credit unions will begin the LDR submission via IRIS with the June 30, 2026 quarter-end, due in July.

Appendix A

In response to stakeholder feedback on specific data fields, BCFSA updated, clarified, or removed data fields and listed BCFSA’s responses in the stakeholder feedback table below. Some data field updates and clarifications with no specific feedback are also listed in the table below in response to credit unions’ request to BCFSA ensuring the LDR reporting requirements are defined with appropriate details. Data field updates and clarifications are also included in the LDR reporting templates and instructions. The list of data fields that were removed from the proposed requirements based on feedback is in [Appendix B](#).

STAKEHOLDER FEEDBACK TABLE – SPECIFIC DATA FIELDS

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
Data Fields - Personal Loans and Leases			
101 (prior 103) ¹	Company ID	Credit unions asked for clarification on the purpose and reporting of this data field.	As the LDR is reported on a consolidated basis, the “Company ID” field is used to identify loans and leases held by the credit union or any of its subsidiaries. Credit unions with no subsidiaries may leave this data field blank.
102 (prior 104)	Source of Origination	Credit unions requested clarification for reporting selections, e.g., when a broker-sourced mortgage matures, and it is renewed by a branch of the credit union.	Source of origination should remain the same at renewal and get updated at refinance, as appropriate. For example, if the mortgage is originated through a broker and renewed by the credit union via one of its branches, the source remains “2” (Broker) or if the mortgage is originated by broker and refinanced through the credit union directly, the source will change to “1” (Branch).

¹ ID numbers of each data fields previously provided in the Draft LDR requirements (proposed on November 9, 2023) are listed in brackets for reference only.

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
103 (prior 109)	Product Type	Credit unions requested definition of Combined Loan Product ("CLP"). They noted that credit unions may have combined loans with lines of credit ("LOCs") but without the CLP feature. Currently, credit unions do not offer these types of products.	<p>A CLP is defined as underwriting a term mortgage and a Home Equity Line of Credit ("HELOC") on a combined basis on the same property with an authorized borrowing limit, so the HELOC limit increases as the mortgage is paid down.</p> <p>Based on feedback, BCFSA updated the list of pre-defined categories of product types.</p>
104 (prior 110)	Product Subtype	Credit unions asked for clarification on reporting HELOCs.	HELOCs are reported as "2" (Interest-only mortgage).
105 (prior 112)	Type of Transaction	Credit unions requested clarification for categories when a loan is refinanced and transferred from another financial institution. They noted that interpretation of transaction type categories may differ between credit unions.	Credit unions are expected to report "2" (Refinance) when the loan is refinanced within the credit union and to report "4" (Transfer from other financial institution) when applicable.
107 (prior 114)	Occupancy Type	Credit unions asked for clarification on reporting mixed occupancy type.	Credit unions should report "4" for mixed occupancy, i.e., owner lives in a home and rents the basement suite.
108 (prior 115)	Loan Type	Credit unions requested definition of "regulatory retail exposure" and further clarification to ensure correct reporting.	<p>With the issuance of the new Capital Rule, BCFSA will provide additional capital reporting guidance. In the meantime, credit unions should use the regulatory retail exposure definition from the Capital Modernization - Consultation Paper (reference 2(k) on page 28) and the Capital Modernization - Consultation Summary Report (reference 20.3 on page 28).</p> <p>BCFSA updated the data field to "Loan Type", as this information is critical in the LDR regardless of capital reporting requirements, and updated the list of pre-defined categories of loan types to refine the selection.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
110 (prior 117 & 118)	NIQ/Equity Lending	Credit unions requested definition of non-income qualifying (“NIQ”) or equity lending. They noted that most credit unions do not distinguish between NIQ and equity lending.	<p>Based on feedback, BCFSA combined NIQ lending and equity lending data fields. Reporting is required only for real estate secured loans, including reverse mortgages.</p> <p>NIQ/Equity lending refers to loans where traditional income verification was not used to support loan approval and debt-servicing requirements.</p>
115 (prior 123)	Insurance Status	Credit unions noted that an indicator for portfolio versus individual insurance is not readily available for some credit unions.	BCFSA updated the list of pre-defined categories to include “3 - Insured (individual or portfolio)” for insured mortgages where the credit union is unable to distinguish between individually vs portfolio insured.
117 (prior 126)	Insurable Mortgage	Credit unions asked for clarification on reporting insured mortgages and non-mortgage loans.	<p>Credit unions should leave this field blank for mortgages that are already insured or for non-mortgage loans where this field is not applicable.</p> <p>Credit unions are expected to report "2" (No) if data is not available to establish insurability.</p>
120 (prior 129)	Borrower Credit Protection Insurance	Credit unions noted challenges in tracking historical data for this data field and tracking changes if the insurance is cancelled or sold after loan origination.	<p>BCFSA updated the requirements to report based on data at origination only and updated the list of pre-defined categories to refine the selection.</p> <p>If multiple coverages apply, credit unions are expected to report the leading number of all applicable selections separated by a semicolon (“;”).</p>
121 (prior 130)	Delinquency Status	Credit unions requested clarification for reporting default versus delinquency.	Loan delinquency refers to the state of a payment being late or overdue on a loan. All delinquencies, including those as short as one day, must be reported.

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
123 (prior 133)	Past Due Amount	Credit unions asked for clarification on calculating the past due amount.	The past due amount is to be calculated as of the reporting date.
124 (prior 134)	Default Status	Credit unions requested clarification for reporting default versus delinquency and for how long defaulted and written-off loans should be reported in the LDR submissions.	<p>Default refers to a prolonged period of loan delinquency (e.g., 90 days or more), or other reasons showing unlikelihood of the borrower’s debt repayment (e.g., the borrower defaults on other accounts).</p> <p>BCFSA expects credit unions to keep reporting defaulted and written-off loans in the LDR during the entire lifecycle of default, collection, and collateral liquidation and closure.</p>
125 (prior 135)	Default Reasons	Credit unions requested further clarification of categories for default reasons, as credit unions may have different definitions.	BCFSA updated the list of pre-defined categories but expect credit unions to use their own definition of default and report in the LDR accordingly. If the appropriate category is not listed, report as “999” (Other).
126 (prior 141)	IFRS 9 Stage	<p>Credit unions noted their IFRS 9 Expected Credit Loss (“ECL”) models are not integrated with their banking systems and for some credit unions this information is not readily available at the individual loan level. They expressed concern that reporting IFRS 9 Stage 3 specific allowances would be a manual process.</p> <p>Credit unions commented that their ECL models and related accounting policies are fully reviewed and audited at year-end by their external auditors and should not be required to report to BCFSA in such detail.</p>	<p>BCFSA recognizes that credit unions work with different ECL models but considers expected credit loss information important, as it provides the only forward-looking data in the LDR that can be used for stress testing and to better understand credit unions’ risk management practices.</p> <p>Given the importance of this data, these fields remain in the LDR, but reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting.</p> <p>All credit unions must report IFSR 9 stages 1 - 3 at the individual loan level.</p>
127 (prior 142)	IFRS 9 Allowance		Credit unions must report IFRS 9 allowance information if their ECL models provide this data at the individual loan level.

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			<p>BCFSA updated the LDR requirements to clarify report only if the allowance is calculated at an individual loan level. Credit unions may leave this data field blank if the allowance is calculated at a portfolio level.</p>
<p>128 - 129 (prior 143 - 144)</p>	<p>Probability of Default (“PD”) Loss Given Default (“LGD”)</p>		<p>Credit unions are expected to report PD and LGD as assigned at an individual loan level or at the portfolio level.</p> <p>Reporting of PD and LGD data is not required for Tier 4 credit unions.</p>
<p>130 - 131 (prior 147 - 148)</p>	<p>Original and Current Disbursement/ Funding Date</p>	<p>Credit unions asked for further clarification on reporting original versus current funding date in respect of renewal and refinance.</p>	<p>For new originations and refinanced loans, these two dates coincide and show the date of origination or refinance. For renewals, these two dates differ and reflect the date of origination and the date of renewal, respectively.</p> <p>Credit unions are expected to update the original funding date with the current date for refinanced loans.</p>
<p>132 (prior 149)</p>	<p>Maturity Date</p>		<p>BCFSA renamed this data field from “Renewal Date” to “Maturity Date” to better align with industry terms used in credit unions’ banking systems.</p>
<p>136 (prior 155)</p>	<p>Interest Rate Type</p>		<p>BCFSA updated the LDR requirements to distinguish variable rate and adjustable rate categories.</p> <p>For variable rate loans, interest rates change with the reference rate, but the monthly payments stay the same. For adjustable rate loans, interest rates change with the reference rate and the monthly payments adjust with rate changes.</p>
<p>139 - 141</p>	<p>Reference Rate</p>	<p>Credit unions asked for clarification on reporting variable rate versus fixed rate loans.</p>	<p>Credit unions should leave these data fields (ID# 139-141) blank for fixed rate loans.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
(prior 159 - 161)	Interest Rate – Prime and Spread		
144 (prior 166)	Co-lending	Credit unions requested definition of co-lending. They noted that currently, credit unions have limited or no engagement in co-lending activities on the retail side.	Based on feedback, BCFSA renamed this data field from “Co-lender Amount” to “Co-lending” to indicate if the loan is part of a co-lending arrangement with another lender. Co-lending refers to situations where multiple lenders jointly provide loans to the borrower.
145 (prior 167)	Currency		BCFSA updated the list of pre-defined categories. Credit unions are to report "1" for CAD currency as a default value.
147 (prior 169)	Source of Down Payment	Credit unions noted challenges in reporting, as most credit unions do not track the source of down payment information in their systems. Credit unions asked for a new category “sale of property” to be added to the selection.	BCFSA understands that credit unions must validate the source of down payment as part of their due diligence for underwriting and considers tracking the source of down payment information important for Anti-Money Laundering (“AML”) purposes. Given its importance, this field remains in the LDR, but reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting. BCFSA updated the list of pre-defined categories to include “6 - Sale of property”.
152 (prior 175)	Exception to Policy	Credit unions requested clarification whether to report exceptions to operational or lending policy.	Credit unions are expected to report exceptions to the credit union’s Investment and Lending Policy (“ILP”).
153 (prior 176)	Description of Exception		For multiple exception types, credit unions are expected to report each type separated by a semicolon (“;”).

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
154 (prior 177)	Whole Loan Purchase	Credit unions asked for clarification of whole loan purchase.	Credit unions should report whole loan purchases exclusive of loans acquired in business combination (asset acquisition or merger).
155 (new)	Accrued Interest		BCFSA added a new data field “Accrued Interest” to capture accrued interest on loans.
158 (prior 201)	TDS Used for Capital	<p>Credit unions expressed concern about reporting data fields related to the Capital Modernization Project, as they need to understand the new capital requirements before they can assess the impact on LDR reporting.</p> <p>Credit unions also raised concern about calculating and reporting two TDS ratios and the need for system and process improvements to capture, maintain and report multiple TDS calculations.</p> <p>Credit unions asked for clarification about BCFSA’s expectation to update the TDS ratio at renewal and about the difference between the TDS ratio and the TDS ratio used for capital reporting.</p>	<p>BCFSA recognizes credit unions’ concern about timelines. To better align LDR reporting with the revised timeline of the Capital Modernization Project, reporting of the data fields related to Capital Modernization, such as TDS used for capital reporting, are not required until LDR Phase 2.</p> <p>With the issuance of the new Capital Rule, BCFSA will provide additional capital reporting guidance, including the determination of TDS ratio/income used for capital.</p> <p>BCFSA clarified that credit unions may report different TDS used for underwriting purposes (based on the credit union’s lending policy) and for capital reporting purposes (based on BCFSA’s capital reporting guidance). Standardized requirements are essential for capital reporting purposes.</p>
159 - 160 (prior 202 - 203)	LTV and Combined LTV at Origination	Credit unions requested further clarification for the calculation of Loan-to-Value (“LTV”) and combined LTV at loan origination.	The LTV ratio is calculated by dividing the approved amount of a term mortgage (or the authorized limit of a secured line of credit) by its corresponding collateral value at loan origination; and the combined LTV ratio calculation must include all loans and lines of credit secured by the same collateral(s) and the total collateral value at loan origination. The collateral value must be at the date of loan origination and supported by an appraisal or other objective evidence of value.

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
162 (prior 206)	Type of Collateral	Credit unions noted they do not differentiate between cash and deposit types of collaterals.	<p>Based on feedback, BCFSA updated the list of pre-defined categories and merged categories “2 - Cash”, “3 - Deposits with a DTI”, and “4 - Other deposits” into a new category “2 - Cash/Deposits” to refine the selection.</p> <p>For loans secured by multiple type of collateral, credit unions are expected to select the type of collateral which has the highest combined value.</p>
163 (prior 207)	Rights to Collateral		<p>Rights to collateral refers to the security charge registered on the collateral. Credit unions should leave this field blank for unsecured loans.</p> <p>For loans secured by multiple properties, credit unions are expected to report the rights to collateral of the property with the highest value.</p>
164 (prior 208)	Co-ownership on Collateral	Credit unions requested definition of co-ownership.	Co-ownership occurs when two or more parties share ownerships rights over the collateral property.
166 - 167 (prior 210 - 211)	Location of Collateral - Street Name and Civic Number Property Identifier	<p>Credit unions suggested duplicate information is requested, as the property address can be obtained from the Property Identifier ("PID") number.</p> <p>Credit unions expressed privacy concern for identifiable personal information and requested clarification of what purpose this information is collected and used for.</p>	<p>BCFSA understands that in most cases PID number identifies the location of collateral but in some cases reporting the PID number itself is insufficient. This is because not all properties have PID (e.g., properties on Crown Land or First Nation Land or leased land) and PID may not be unique (e.g., co-ops). In addition, due to the importance of collateral location, having this data provides an additional layer of information, ensuring that the collateral can be accurately identified and assessed even when PID data is unreliable.</p> <p>BCFSA ensures the protection of privacy and security of all LDR data with robust data security and appropriate data</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			<p>governance. Data fields with identifiable information will be masked to protect privacy.</p> <p>Collateral location data is essential for real estate secured lending to support assessment of collateral values and geographical concentration risk. Location information is important, as the value of collateral varies based on local market and economic conditions.</p> <p>Multiple properties pledged as collateral are to be reported with their respective addresses, separated by a semicolon (";").</p>
170 (prior 214)	Source of Market Value at Origination		<p>BCFSA updated the list of pre-defined categories to refine the selection.</p> <p>For loans secured by multiple properties, credit unions are expected to report the source of the market value of the property with the highest value.</p>
171 (prior 215)	Value of Collateral [Latest]		<p>BCFSA updated the data field name to “Value of Collateral” and removed reference to “assessment/appraisal” value.</p> <p>For loans supported by multiple properties, the collateral value for each property is to be reported, separated by a semicolon (“;”).</p>
172 - 173 (prior 216 - 217)	Source and Date of Value of Collateral [Latest]		<p>BCFSA updated the data field name to “Source of Value of Collateral” and “Date of Value of Collateral”, respectively and removed reference to “assessment/appraisal” value.</p> <p>The list of pre-defined categories was updated with “1 - Full Appraisal” and “8 - Purchase price” to refine the selection for the source of market value of collateral.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			For loans secured by multiple properties, credit unions are expected to report the source and date of the property with the highest value.
174 (prior 218)	Dwelling Type		For loans secured by multiple properties, the dwelling type of the property with the highest value is to be reported.
175 (prior 219)	Property Tenure Type	Credit unions requested further clarification on reporting property tenure type and the selection for First Nations mortgage financing.	BCFSA updated the list of pre-defined categories of property tenure types to refine the selection. First Nations mortgage financing should be reported as "999" (Other) category. Credit unions should report the property tenure type for real estate secured loans only. For loans secured by multiple properties, select the tenure type of the property with the highest value.
176 (prior 220)	New Construction		Reporting of new construction is required only for real estate secured loans.
178 (prior 255)	Guarantor Income		For more than one guarantor, credit unions are expected to report the sum of income for all guarantors.
179 (prior 256)	Unique Member/Borrower ID		For multiple borrowers, if multiple IDs are available, each ID should be reported, separated by a semicolon (;).
180 (prior 257)	Customer/Member ID		For multiple borrowers, associated customer/member IDs are to be reported, separated by a semicolon (;).

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
181 (new)	Borrower Type Select from: 1 - Individual 2 - Entity		<p>BCFSA added a new data field “Borrower Type” to differentiate between types of borrowers within the retail portfolio.</p> <p>Personal trust, personal investment company and holding company fall into category "2" (Entity).</p>
184 (prior 261)	Borrower Birth Year	Credit unions expressed privacy concern for identifiable personal information and requested clarification of what purpose this information is collected and used for.	<p>BCFSA ensures the protection of privacy and security of all LDR data with robust data security and appropriate data governance. Data fields with identifiable information will be masked to protect individual privacy.</p> <p>BCFSA requires this data to assess whether credit unions are upholding Market Code of Conduct (“MCC”) principles related to Fair Treatment (MCC 2.1) and Vulnerable Members (MCC 2.3), particularly in their interactions with elderly borrowers. Identifying borrowers by age helps evaluate practices, such as loan suitability and the impact of branch closures on older borrowers who may rely more heavily on in-person service.</p>
185 (prior 262)	Borrower Membership Tenure	Credit unions asked for clarification on the reason for reporting membership tenure, as it is not a factor in their underwriting decisions. They also requested clarification for reporting multiple borrowers.	<p>BCFSA recognizes that borrower membership tenure provides insight into how familiar a member is likely to be with credit union products and services, helping assess the risk of borrowers misunderstanding loan structures. This data also supports evaluating a borrower’s risk profile and provides insight on the strength of a credit unions’ member relationships.</p> <p>For multiple borrowers, the maximum membership tenure is to be reported.</p>
187	Name of Employer	Credit unions noted they record this information at the borrower-level and the lack of standardization may lead to	BCFSA ensures the protection of privacy and security of all LDR data with robust data security and appropriate data

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
(prior 267)		<p>data quality issues. They suggested to keep only the employer's industry code data field in the LDR.</p> <p>Credit unions expressed privacy concern for identifiable personal information and requested clarification of what purpose this information is collected and used for.</p>	<p>governance. Data fields with identifiable information will be masked to protect individual privacy.</p> <p>BCFSA clarified the employer's name is significant for assessing at-risk exposures and concentration risk by employers. The employer's industry code is often broad and combines multiple sectors and this high-level categorization may not accurately reflect the unique risks faced by each sector. This data, together with the employer's industry code, is important to conduct stress tests on loan portfolios (e.g., when the certain industries were disproportionately impacted during the pandemic).</p>
189 (prior 270)	Borrower's Net Worth	Credit unions requested clarification on whether to report borrower's net worth only for NIQ/equity lending and noted net worth calculations may differ between credit unions.	<p>BCFSA clarified borrower's net worth should be reported if it factors into the lending decision. Net worth should be determined based on the credit union's own policy.</p> <p>For multiple borrowers, credit unions are expected to report the combined net worth.</p>
192 - 193 (prior 273 - 274)	Credit Bureau Score and Date		For multiple borrowers respective scores are to be reported, separated by a semicolon (;).
195 - 198 (prior 276 - 279)	Bankruptcy Score, Provider and Date		<p>Credit unions should leave these data fields blank if they do not collect a bankruptcy score.</p> <p>For multiple borrowers, report the respective scores separated by a semicolon (;).</p>
201 (prior 282)	Rental Income Subject Property	Credit unions noted challenges in reporting gross rental income, as they mostly record net income after rental offset for TDS calculation.	BCFSA recognizes that some credit unions currently capture net rental income but expects reporting of gross

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
		Credit unions asked to begin reporting gross rental income in Phase 2 and on a go-forward basis, as they need sufficient time for system and process improvements.	rental income without applying rental offset and/or netting against expense. Based on feedback, BCFSA moved reporting of gross rental income to Phase 2 to give credit unions additional time to prepare for reporting. In addition, reporting may begin on a go-forward basis for new originations and get updated at renewal/refinance for existing loans.
203 (prior 285)	Rental Location	Credit unions requested clarification on reporting rental location(s).	Credit unions should report all postal codes from all rental locations that are included in the rental income data field. For multiple properties, report the respective postal codes separated by a semicolon (;).
209 (prior 291)	TDS Income for Capital	Credit unions requested clarification on reporting frequency and the purpose for reporting TDS income for capital.	BCFSA updated the data field name to “TDS Income for Capital” to clarify “TDS Income for Capital” equals the denominator of “TDS Used for Capital”. BCFSA expects this data field to be reported every quarter and updated if the income gets updated. For stress testing purposes, BCFSA needs to be able to disaggregate “TDS Used for Capital” into the amounts in the ratio’s numerator and denominator.
210 (prior 292)	Loan/Mortgage Payments	Credit unions asked to begin reporting loan/mortgage payments in Phase 2 and on a go-forward basis, as they need sufficient time for system and process improvements.	Based on feedback, BCFSA moved reporting of loan/mortgage payments to Phase 2 to give credit unions additional time to prepare for reporting. In addition, reporting may begin on a go-forward basis for new originations and get updated at renewal/refinance for existing loans.
211 - 212	Credit Card Limits & Payments	Credit unions requested further clarification on reporting these data fields (ID# 211-212 and ID# 215-218).	BCFSA clarified that these data fields (and other data fields used to determine TDS) should be reported based on the

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
(prior 293 - 294) 215 - 217 (prior 297 - 299)	Lines of Credit Limits & Payments Drawn/Utilized Amounts of Lines of Credit Payments		credit union's own TDS ratio calculation for underwriting purposes. For multiple borrowers, credit unions are expected to report the aggregate amount for all borrowers.
224 - 231 (prior 181 - 190)	Payment Deferrals/ Temporary Payment Arrangements	<p>Credit unions expressed concern that reporting these data fields would be a manual process. They noted these are mostly related to infrequent events and tracked separately from their banking systems, so building the capture of this information into their systems would require significant effort with little benefits.</p> <p>Credit unions suggested ad hoc reporting of this information during significant economic events rather than part of regular reporting of the LDR.</p>	<p>BCFSA recognizes these data fields (ID# 224-231) may relate to infrequent events but considers this information is important when triggered by economic events (e.g., the recent pandemic and the rapid interest rate increases afterward) and used to closely monitor amortization extensions, loan balance increases, and updated payment schedules.</p> <p>Given the importance of this data, these fields remain in the LDR. Reporting will be optional until requested by BCFSA.</p> <p>BCFSA will notify credit unions when reporting of these Payment Deferrals/Temporary Payment Arrangements data fields are required.</p> <p>Clarified that the “Amount of Lumpsum Payment” includes any lump sum towards principal and/or interest and “Interest Only” means no principal repayment, including both non-amortizing and negatively amortizing mortgages.</p>
232 - 236 (prior 136 - 140)	Loan ID - Write-off/Recovery Write-off Date and Amount Loan Recovery Date and Amount	<p>Credit unions noted that once a loan is written off and closed, write-offs and recoveries are tracked separately under the same loan ID but without most of the loan attributes previously reported.</p> <p>Credit unions requested clarification whether to report write-offs and recoveries during the reporting period (i.e., quarter) or cumulative from the initial write-off date, and for</p>	<p>Based on feedback, BCFSA updated the LDR requirements to ease and streamline reporting and moved the loan write-off/recovery data fields (ID# 232-236) into a separate sub-page in the LDR reporting template.</p> <p>Credit unions to report the loan ID, write-off date and amount, loan recovery date and amount for all full or partial</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
		<p>how long defaulted and written-off loans should be reported in the LDR.</p>	<p>write-offs and recoveries processed during the reporting period (i.e., quarter).</p> <p>BCFSA expects credit unions to keep reporting defaulted and written off loans in the LDR during the entire lifecycle of default, collection, and collateral liquidation and closure. If a loan is closed as of the reporting date but has write-offs or recoveries during the reporting period (i.e., quarter), this loan should also be included in the write-offs and recoveries sub-page in the LDR.</p>
<p>237 (prior 152)</p>	<p>Loan ID - Closed Loans</p>	<p>Credit unions noted challenges in reporting closed loans, as not all data fields are relevant or available once a loan is closed.</p>	<p>Based on feedback, BCFSA updated the LDR requirements to ease and streamline reporting and moved the reporting of closed loans into a separate sub-page in the LDR reporting template. In addition, reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting.</p> <p>Credit unions are to report a list of loan IDs for loans that have been closed during the reporting period (i.e., quarter).</p>
<p>238 (prior 180)</p>	<p>AML Red-flagged Member/Borrower ID</p>	<p>Credit unions noted AML flag is tracked on the member level, not on the loan level, and this information is often managed outside of their banking systems. They also requested clarification whether to report only when borrower is flagged as at the reporting date.</p>	<p>Based on feedback, BCFSA updated the LDR requirements to ease and streamline reporting and moved the reporting of AML red-flagged borrowers into a separate sub-page in the LDR reporting template. In addition, reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting.</p> <p>Credit unions are to report a list of member/borrower IDs flagged for AML risk as at the reporting date.</p> <p>BCFSA expects credit unions to report a list of member/borrower ID where the credit union identified higher AML risk (i.e., the borrower was flagged for unusual or suspicious activities).</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
239 - 252	Subset of Data Fields to Report Defaulted Non-RE Secured Loans and Leases		<p>In response to credit unions' feedback about proportional reporting of the LDR, BCFSA revised the LDR requirements to ease reporting for credit unions with up to and including \$5 billion in assets. These credit unions are not required to report non-RE secured loans and leases in the LDR, except when these loans and leases are defaulted or in the write-off process.</p> <p>Credit unions with up to and including \$5 billion in assets, report only a subset of data fields (ID# 239-252) for non-RE secured loans and leases that are defaulted or in the write-off process in a separate sub-page in the LDR reporting template.</p> <p>Reporting of the loan ID, write-off date and amount, loan recovery date and amount for all full or partial write-offs and recoveries processed during the reporting period (i.e., quarter) is required for these defaulted non-RE secured loans and leases, and included in the separate sub-page for write-offs and recoveries (ID# 232-236) in the LDR reporting template.</p> <p>Reporting of the loan IDs for loans that have been closed during the reporting period (i.e., quarter) is required for these defaulted non-RE secured loans and leases, and included in the separate sub-page for closed loans (ID# 237) in the LDR reporting template.</p>
Data Fields - Commercial Loans and Leases			
502 (prior 503)	Company ID	Credit unions asked for clarification on the purpose and reporting of this data field.	As the LDR is reported on a consolidated basis, the "Company ID" field is used to identify loans and leases held by the credit union or any of its subsidiaries.

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			Credit unions with no subsidiaries may leave this data field blank.
503 (prior 506)	Loan Type	<p>Credit unions requested definition of “regulatory retail exposure” and further clarification to ensure correct reporting.</p> <p>They also asked for clarification on reporting commercial real estate (“CRE”) secured loans on residential property (i.e., 1-4 units) and reporting subdivision financing and other land development loans.</p>	<p>With the issuance of the new Capital Rule, BCFSA will provide additional capital reporting guidance. In the meantime, credit unions should use the regulatory retail exposure definition from the Capital Modernization - Consultation Paper (reference 2(k) on page 28) and the Capital Modernization - Consultation Summary Report (reference 20.3 on page 28).</p> <p>BCFSA updated data field to “Loan Type”, as this information is critical in the LDR regardless of capital reporting requirements and updated the list of pre-defined categories of loan types to refine the selection.</p> <p>Credit unions are expected to report CRE secured loans on residential property (i.e., 1-4 units) as category “3” (CRE - Income-Producing). For construction loans, report the same with the appropriate category “5” (CRE - Construction (general)) or “6” (CRE - Construction (speculative)).</p> <p>For subdivision financing and other land development loans, report with the appropriate category “4” (CRE Construction (multi-residential)) or “5” (CRE Construction (general)) or “6” (CRE - Construction (speculative)).</p>
504 (prior 508)	Product Type	Credit unions asked for three new categories “LOC otherwise secured”, “Canada Small Business Financing Program (“CSBFP”) loan”, and “cash secured” to be added to the selection.	BCFSA updated the list of pre-defined categories of product types to include category “2 - LOC otherwise secured”, “7 - CSBFP loan”, and “8 - Cash secured”.
506 (prior 511)	Type of Transaction	Credit unions requested clarification for categories when a loan is refinanced and transferred from another financial	Credit unions are expected to report “2” (Refinance) when the loan is refinanced within the credit union and to report

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
		institution. They noted that interpretation of transaction type categories may differ between credit unions.	"4" (Transfer from other financial institution) when applicable.
508 - 509 (prior 513 - 514)	Seniority Security	Credit unions asked for clarification on reporting on seniority versus security of a loan.	Seniority refers to the priority in capital structure when it comes to repayment in the event of bankruptcy or liquidation, whereas security refers to the access of the underlying collateral.
514 (prior 520)	Loan Type When Construction Completed	Credit unions requested clarification on reporting CRE secured loans on residential property (i.e., 1-4 units) and on how to report subdivision financing and other land development loans.	<p>Credit unions are expected to report CRE secured loans on residential property (i.e., 1-4 units) as category "3" (CRE - Income-Producing).</p> <p>Subdivision financing and other land development loans are to be reported with the appropriate category, according to the loan type when construction is completed, such as "1" for CRE - Residential (multi-residential), "2" for CRE - Owner-Occupied or "3" for CRE - Income-Producing loan categories.</p>
520 (prior 530)	Syndicated Contribution	Credit unions noted that approved amounts and balances of lead lenders for syndicated deals are not tracked in most credit unions' systems. These are mostly paper based and updated during annual reviews.	Based on feedback, BCFSA renamed this data field to "Syndicated Contribution" to capture the percentage of the credit union's approved contribution to the entire syndicated loan as opposed to capture the approved amount.
521 - 522 (prior 533 - 535)	Arranging Institution Name Lead Lender(s)	Credit unions asked for clarification on reporting arranging institution versus a lead lender.	<p>Typically, the arranging institution (or mandated lead arranger) structures the syndicated loan, negotiates terms with the borrower, and recruits other lenders into the deal.</p> <p>The lead lender (or lead financial institution) typically contributes a large share of the loan and may act as the administrative agent, handling disbursements, payments, and borrower communication after closing.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			<p>There may be cases where the institution that arranges a syndicated deal would also become the lead lender of the deal.</p>
<p>523 (prior 540)</p>	<p>Covenants Compliance Flag</p>	<p>Credit unions noted challenges in reporting financial covenants, as this information is mostly paper based.</p> <p>Credit unions asked for further clarification on updating (during annual reviews or at renewal) and reporting covenants compliance.</p>	<p>Based on feedback, BCFSA renamed this data field to “Covenants Compliance Flag” to capture compliance or non-compliance of the facility with all covenants.</p> <p>BCFSA clarified that updating and reporting covenants compliance should be based on the credit union’s own assessment.</p>
<p>526 (prior 545)</p>	<p>Default Status</p>	<p>Credit unions requested clarification for reporting default versus delinquency and for how long defaulted and written-off loans should be reported in the LDR submissions.</p>	<p>Default refers to a prolonged period of loan delinquency (e.g., 90 days or more), or other reasons showing unlikelihood of the borrower’s debt repayment (e.g., the borrower defaults on other accounts).</p> <p>BCFSA expects credit unions to keep reporting defaulted and written-off loans in the LDR during the entire lifecycle of default, collection, and collateral liquidation and closure.</p>
<p>527 (prior 547)</p>	<p>Default Reasons</p>	<p>Credit unions requested further clarification of categories for default reasons, as credit unions may have different definitions.</p>	<p>BCFSA updated the list of pre-defined categories but expects credit unions to use their own definition of default and report in the LDR accordingly. If the appropriate category is not listed, report as “999” (Other).</p>
<p>528 - 529 (prior 553 - 554)</p>	<p>Original and Current Disbursement/ Funding Date</p>	<p>Credit unions asked for further clarification on reporting original versus current funding date in respect of renewal and refinance.</p>	<p>For new originations and refinanced loans, these two dates coincide and show the date of origination or refinance. For renewals, these two dates differ and reflect the date of origination and the date of renewal, respectively.</p> <p>Credit unions are expected to update the original funding date with the current date for refinanced loans.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
530 (prior 555)	Review Date	Credit unions asked for further clarification on reporting review date (ID# 530) versus risk rating assessment date (ID# 558).	<p>The review date (ID# 530) refers to the date of a loan's periodic credit review, while the date of risk rating assessment (ID# 558) refers to the specific date on which the borrower's credit risk was last evaluated, and the risk rating was updated. This may occur independently of a scheduled review.</p> <p>Credit unions should update the review date when a full or partial review is done.</p>
531 (prior 556)	Annual Review Category	Credit unions noted for some credit unions' banking systems indicate reviews but often not the review type.	BCFSA expects credit unions to track full versus partial reviews, as they would have different implications on risk oversight.
533 (prior 560)	Maturity Date		BCFSA renamed this data field from "Renewal Date" to "Maturity Date" to better align with industry terms used in credit unions' banking systems.
539 - 541 (prior 566 - 568)	Reference Rate Interest Rate – Benchmark and Spread	Credit unions asked for clarification on reporting variable rate versus fixed rate loans.	Credit unions should leave these data fields (ID# 539-541) blank for fixed rate loans.
543 (prior 570)	Source of Down Payment	<p>Credit unions noted challenges in reporting, as most credit unions do not track the source of down payment information in their systems.</p> <p>Credit unions asked for a new category "sale of property" to be added to the selection.</p>	<p>BCFSA understands that credit unions must validate the source of down payment as part of their due diligence for underwriting and considers tracking the source of down payment information important for AML purposes.</p> <p>Given its importance, this field remains in the LDR, but reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			<p>BCFSA updated the list of pre-defined categories to include “4 - Gifted funds” and “8 - Sale of assets (such as property)”.</p> <p>Credit unions should select the option that corresponds to the source of the largest amount.</p>
544 – 545 (prior 571-572)	Approved Amount Outstanding Amount/Balance		BCFSA updated the LDR requirements to clarify for syndicated deals, credit unions must report only the credit union's contribution to the approved amount and to the outstanding balance - exclusive of other lenders' contributions.
546 (prior 573)	Currency		BCFSA updated the list of pre-defined categories. Credit unions are to report "1" for CAD currency as a default value.
552 (prior 579)	Exception to Policy	Credit unions requested clarification whether to report exceptions to operational or lending policy.	Credit unions are expected to report exceptions to the credit union's Investment and Lending Policy ("ILP").
553 (prior 580)	Description of Exception		For multiple exception types, credit unions are expected to report each type separated by a semicolon (;).
554 - 555 (prior 583 - 584)	DSCR DSCR Used for Capital	<p>Credit unions expressed concern about reporting data fields related to the Capital Modernization Project, as they need to understand the new capital requirements before they can assess the impact on LDR reporting.</p> <p>Credit unions asked for clarification about the difference between the DSCR and the DSCR used for capital reporting and using NOI or EBIDA versus EBIDTA in the calculation.</p>	<p>BCFSA recognizes credit unions' concern about timelines. To better align LDR reporting with the revised timeline of the Capital Modernization Project, reporting of the data fields related to Capital Modernization, such as DSCR used for capital reporting, are not required until LDR Phase 2.</p> <p>With the issuance of the new Capital Rule, BCFSA will provide additional capital reporting guidance, including the determination of DSCR used for capital.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
		<p>Credit unions noted challenges in reporting DSCR, as this information is paper based for some credit unions.</p>	<p>BCFSA clarified that credit unions may report different DSCR used for underwriting purposes (based on the credit union’s lending policy) and for capital reporting purposes (based on BCFSA’s capital reporting guidance). Standardized requirements are essential for capital reporting purposes.</p> <p>DSCR is an essential information in commercial underwriting. BCFSA expects credit unions to digitalize loan data, such as DSCR, for their own risk management and reporting.</p>
<p>558 (prior 588)</p>	<p>Date of Risk Rating Assessment [Latest]</p>	<p>Credit unions asked for further clarification on reporting review date (ID# 530) versus risk rating date (ID# 558).</p>	<p>BCFSA updated the data field name to “Date of Risk Rating Assessment” to indicate this date refers to the date when the latest risk rating assessment was done.</p> <p>Credit unions should update the risk rating assessment date even if the risk rating remains the same.</p>
<p>559 (prior 590)</p>	<p>IFRS 9 Stage</p>	<p>Credit unions noted their IFRS 9 Expected Credit Loss (“ECL”) models are not integrated with their banking systems and for some credit unions this information is not readily available at the individual loan level. They expressed concern that reporting IFRS 9 Stage 3 specific allowances would be a manual process.</p> <p>Credit unions commented that their ECL models and related accounting policies are fully reviewed and audited at year-end by their external auditors and may not require to report to BCFSA in such detail.</p>	<p>BCFSA recognizes that credit unions work with different ECL models but considers expected credit loss information important, as it provides the only forward-looking data in the LDR that can be used for stress testing and to better understand credit unions’ risk management practices.</p> <p>Given the importance of this data, these fields remain in the LDR, but reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting.</p> <p>All credit unions must report IFSR 9 stages 1-3 at the individual loan level.</p>
<p>560 (prior 591)</p>	<p>IFRS 9 Allowance</p>		<p>Credit unions must report IFRS 9 allowance information if their ECL models provide this data at the individual loan level.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			<p>BCFSA updated the LDR requirements to clarify report only if the allowance is calculated at an individual loan level. Credit unions may leave this data field blank if the allowance is calculated at a portfolio level.</p>
<p>561 - 562 (prior 592 - 593)</p>	<p>Probability of Default (“PD”) Loss Given Default (“LGD”)</p>		<p>Credit unions are expected to report PD and LGD as assigned at an individual loan level or at the portfolio level.</p> <p>Reporting of PD and LGD data is not required for Tier 4 credit unions.</p>
<p>566 (prior 598)</p>	<p>Loan-to-Cost Ratio at Origination</p>	<p>Credit unions asked for clarification on reporting the Loan-to-Cost (“LTC”) ratio at origination versus the latest LTC ratio.</p> <p>Credit unions noted challenges in reporting the LTC ratio and asked to begin reporting in Phase 2, as this information is paper based for some credit unions and they need sufficient time for system and process improvements.</p>	<p>BCFSA expects credit unions to have the LTC ratio captured as at origination and begin reporting in Phase 1 for all construction loans. Credit unions should capture LTC at origination and LTC latest should be available for all credit unions, as part of their underwriting and ongoing monitoring.</p> <p>LTC is an essential information in commercial underwriting for construction loans. BCFSA expects credit unions to digitalize loan data, such as LTC, for their own risk management and reporting.</p>
<p>567 (prior 599)</p>	<p>Type of Collateral</p>		<p>BCFSA updated the list of pre-defined categories and combined two categories, “3 - Secured by hypothecated DTI deposits” and “4 - Secured by other deposits”, into one category “3 - Secured by deposits” to refine the selection.</p> <p>For loans secured by multiple type of collateral, credit unions are expected to select the type of collateral which has the highest combined value.</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
568 (prior 600)	Classification of Collateral		For loans secured by multiple properties, credit unions are expected to select the classification of the property with the highest value.
570 - 571 (prior 602 - 603)	Location of Collateral - Street Name and Civic Number Property Identifier	Credit unions suggested duplicate information is requested, as the property address can be obtained from the Property Identifier ("PID") number. Credit unions expressed privacy concern for identifiable personal information and requested clarification of what purpose this information is collected and used for.	<p>BCFSA understands that in most cases PID number identifies the location of collateral but in some cases reporting the PID number itself is insufficient. This is because not all properties have PID (e.g., properties on Crown Land or First Nation Land or leased land) and PID may not be unique or may change (e.g., land development/subdivision). In addition, due to the importance of collateral location, having this data provides an additional layer of information, ensuring that the collateral can be accurately identified and assessed even when PID data is unreliable.</p> <p>BCFSA ensures the protection of privacy and security of all LDR data with robust data security and appropriate data governance. Data fields with identifiable information will be masked to protect privacy.</p> <p>Collateral location data is essential for real estate secured lending to support assessment of collateral values and geographical concentration risk. Location information is important as the value of collateral varies based on local market and economic conditions.</p> <p>Multiple properties pledged as collateral are to be reported with their respective addresses, separated by a semicolon (";").</p>
574 (prior 607)	Source of Market Value at Origination		For loans secured by multiple properties, credit unions are expected to report the source of the market value of the property with the highest value.

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
575 (prior 609)	Value of Collateral [Latest]	Credit unions noted that getting an updated valuation/appraisal is not typical for existing commercial loans, but collateral values are reviewed annually.	<p>Based on feedback, BCFSA updated the data field name to “Value of Collateral” to remove “assessment/appraisal” reference.</p> <p>For loans supported by multiple properties, the collateral value for each property is to be reported, separated by a semicolon (“;”).</p>
576 - 577 (prior 610 - 611)	Source and Date of Value of Collateral [Latest]		<p>BCFSA updated the data field name to “Source of Value of Collateral” and “Date of Value of Collateral”, respectively and removed reference to “assessment/appraisal” value. The list of pre-defined categories was updated with “4 - Desk review” to refine the selection for the source of market value of collateral.</p> <p>For loans secured by multiple properties, credit unions are expected to report the source and date of the property with the highest value.</p>
578 (prior 647)	Name of the Business	Credit unions expressed privacy concern for identifiable personal information, as some of the small business loans are granted to individuals, and requested clarification of what purpose this information is collected and used for.	<p>BCFSA ensures the protection of privacy and security of all LDR data with robust data security and appropriate data governance. Data fields with identifiable information will be masked to protect individual privacy.</p> <p>For BCFSA, collecting various business-related names, such as names of borrowers, is important for monitoring and assessing borrower-level credit concentration and aggregate it for system-wide exposure analysis.</p>
580 (prior 649)	Unique Member/Borrower ID		For multiple borrowers, if multiple IDs are available, each ID should be reported, separated by a semicolon (“;”).

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
581 (prior 501)	Customer/Member ID		For multiple borrowers, associated customer/member IDs are to be reported, separated by a semicolon (;,;).
583 (prior 651)	Number of Borrowers	Credit unions requested clarification on reporting number of borrowers for joint ventures, limited or general partnerships.	A joint venture or a partnership (with multiple partners) is reported and counted as one borrower.
584 (prior 652)	Other Borrowers' Names	Credit unions expressed privacy concern for identifiable personal information, as some of the small business loans are granted to individuals, and requested clarification of what purpose this information is collected and used for.	<p>BCFSA ensures the protection of privacy and security of all LDR data with robust data security and appropriate data governance. Data fields with identifiable information will be masked to protect individual privacy.</p> <p>For BCFSA, collecting various business-related names, such as names of borrowers, is important for monitoring and assessing borrower-level credit concentration and aggregate it for system-wide exposure analysis.</p>
587 (prior 655)	Common Risk Name	Credit unions expressed privacy concern for identifiable personal information, and requested clarification of what purpose this information is collected and used for.	<p>Based on feedback, BCFSA renamed this data field to “Common Risk Name” and provided the definition, as “one or more legal entities all of which are controlled by a single party. Under all circumstances, control by a single party shall be interpreted as ownership in excess of 50.1% or voting control. Adjudicator discretion may also be applied to aggregate legal entities where no majority ownership exists in order to capture cases of significant influence or common risk.”</p> <p>Common risk name refers to related borrowers or borrowers under common control or influence. For example:</p> <ul style="list-style-type: none"> - Multiple operating companies owned by the same parent; - Borrowers linked through common guarantors; or

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
			- Affiliated companies with cross-default clauses.
591 (prior 666)	Name of Guarantor	Credit unions expressed privacy concern for identifiable personal information, and requested clarification of what purpose this information is collected and used for.	<p>BCFSA ensures the protection of privacy and security of all LDR data with robust data security and appropriate data governance. Data fields with identifiable information will be masked to protect individual privacy.</p> <p>For commercial loans, collecting various business-related names, such as names of guarantors, is important for monitoring and assessing borrower-level credit concentration and aggregate it for system-wide exposure analysis.</p>
593 - 594 (prior 673 - 675)	Payment Deferrals	<p>Credit unions expressed concern that reporting these data fields would be a manual process. They noted these are mostly related to infrequent events and tracked separately from their banking systems, so building the capture of this information into their systems would require significant effort with little benefits.</p> <p>Credit unions suggested ad hoc reporting of this information during significant economic events rather than part of regular reporting of the LDR.</p>	<p>BCFSA recognizes these data fields (ID# 593-594) may relate to infrequent events but considers this information is important when triggered by economic events (i.e., the recent pandemic and the rapid interest rate increases afterward) and used to closely monitor amortization extensions, loan balance increases, and updated payment schedules.</p> <p>Given the importance of this data, these fields remain in the LDR. Reporting will be optional until requested by BCFSA.</p> <p>BCFSA will notify credit unions when reporting of these Payment Deferrals data fields are required.</p>
595 - 599 (prior 548 - 552)	Loan ID - Write-off/Recovery Write-off Date and Amount Loan Recovery Date and Amount	<p>Credit unions noted that once a loan is written off and closed, write-offs and recoveries are tracked separately under the same loan ID but without most of the loan attributes previously reported.</p> <p>Credit unions requested clarification whether to report write-offs and recoveries during the reporting period (i.e., quarter) or cumulative from the initial write-off date and for</p>	<p>Based on feedback, BCFSA updated the LDR requirements to ease and streamline reporting and moved the loan write-off/recovery data fields (ID# 595-599) into a separate sub-page in the LDR reporting template.</p> <p>Credit unions to report the loan ID, write-off date and amount, loan recovery date and amount for all full or partial</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
		<p>how long defaulted and written-off loans should be reported in the LDR.</p>	<p>write-offs and recoveries processed during the reporting period (i.e., quarter).</p> <p>BCFSA expects credit unions to keep reporting defaulted and written off loans in the LDR during the entire lifecycle of default, collection, and collateral liquidation and closure. If a loan is closed as of the reporting date but has write-offs or recoveries during the reporting period (i.e., quarter), this loan should also be included in the write-offs and recoveries sub-page in the LDR.</p>
<p>600 (prior 559)</p>	<p>Loan ID - Closed Loans</p>	<p>Credit unions noted challenges in reporting closed loans, as not all data fields are relevant or available once a loan is closed.</p>	<p>Based on feedback, BCFSA updated the LDR requirements to ease and streamline reporting and moved the reporting of closed loans into a separate sub-page in the LDR reporting template. In addition, reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting.</p> <p>Credit unions are to report a list of loan IDs for loans that have been closed during the reporting period (i.e., quarter).</p>
<p>601 (prior 676)</p>	<p>AML Red-flagged Member/Borrower ID</p>	<p>Credit unions noted AML flag is tracked on the member level, not on the loan level, and this information is often managed outside of their banking systems. They also requested clarification whether to report only when borrower is flagged as at the reporting date.</p>	<p>Based on feedback, BCFSA updated the LDR requirements to ease and streamline reporting and moved the reporting of AML red-flagged borrowers into a separate sub-page in the LDR reporting template. In addition, reporting is not required until LDR Phase 2 to give credit unions additional time to prepare for reporting.</p> <p>Credit unions to report a list of member/borrower IDs flagged for AML risk as at the reporting date.</p> <p>BCFSA expect credit unions to report a list of member/borrower ID where the credit union identified higher AML risk (i.e., the borrower was flagged for unusual or suspicious activities).</p>

ID#	Data Field Name	Summary of Issue/Comment	BCFSA Response
602 - 617	Subset of Data Fields to Report Defaulted Non-RE Secured Loans and Leases		<p>In response to credit unions' feedback about proportional reporting of the LDR, BCFSA revised the LDR requirements to ease reporting for credit unions with up to and including \$5 billion in assets. These credit unions are not required to report non-RE secured loans and leases in the LDR, except when these loans and leases are defaulted or in the write-off process.</p> <p>Credit unions with up to and including \$5 billion in assets, report only a subset of data fields (ID# 602-617) for non-RE secured loans and leases that are defaulted or in the write-off process, in a separate sub-page in the LDR reporting template.</p> <p>Reporting the loan ID, write-off date and amount, loan recovery date and amount for all full or partial write-offs and recoveries processed during the reporting period (i.e., quarter) is required for these defaulted non-RE secured loans and leases, and included in the separate sub-page for write-offs and recoveries (ID# 595-599) in the LDR reporting template.</p> <p>Reporting the loan IDs for loans that have been closed during the reporting period (i.e., quarter) is required for these defaulted non-RE secured loans and leases, and included in the separate sub-page for closed loans (ID# 600) in the LDR reporting template.</p>

Appendix B

BCFSA heard credit unions' feedback about challenges in tracking and reporting some of the data fields (largely on the commercial side, as some information is still paper based). With focus on balancing regulatory requirements with practical implementation challenges faced by credit unions, BCFSA removed 69 (33 per cent) personal loan data fields and 77 (43 per cent) commercial loan data fields from the draft LDR requirements proposed on November 9, 2023. However, BCFSA considers these data fields useful for risk assessment and may request ad hoc data from credit unions on specific loans or may reconsider adding back specific data fields in the future as reporting capabilities and requirements evolve. As risks continue to emerge and evolve, BCFSA may be required to adjust LDR requirements in the future.

The removed field counts noted above include the attributes of real estate secured loans linked to insurance of underlying collateral including coverage for natural perils, greenhouse gas emissions and energy consumption levels of the collateral on the real estate secured loan as well as information on business disruption coverage. BCFSA plans to consult on these loan attributes at a later date.

DATA FIELDS REMOVED FROM THE LDR

ID# ²	Data Field Name – Personal Loans and Leases	ID#	Data Field Name – Commercial Loans and Leases
101	Previous Loan ID	504	Sector/Industry Classification
102	Umbrella Loan Plan ID	505	Project Category/Purpose Code
105	Branch ID/Broker ID	507	Property Usage/Purpose
106	Name of Brokerage	509	Product Description
107	Name of Submortgage Broker	519	Construction Loan
108	Broker Commission	521	Take-out Commitment
111	Product Description	522	Level of Pre-sold Units

² ID numbers of each removed data fields are from the Draft LDR requirements (proposed on November 9, 2023).

ID# ²	Data Field Name – Personal Loans and Leases	ID#	Data Field Name – Commercial Loans and Leases
118	Equity Lending	523	Project Monitor Quantity Surveyor
125	Mortgage Impairment Insurance Premium	525	Insurance Payment
132	Cumulative Days Delinquent	531	Total Outstanding Balance - Syndicated Loan
145	Risk-weighted Asset Amount	532	Reason of Syndication
146	Loan Status	534	Administrative Agent of Lending Group
151	Maturity Date	536	Senior Lenders of Lending Group
157	Current Term Interest Rate	537	Subordinate Lenders of Lending Group
164	CLP Total Balance	538	Mezzanine-Tranche Investor
165	CLP Total Limit	539	Equity Tranche Investor
174	Lending Program	541	Description of Financial Covenants
178	Whole Loan Purchase Source	544	Cumulative Days Delinquent
179	Servicing and Administration Provider	546	Type of Default
182	Reason for Deferral	558	Maturity Date
185	Reason for Temporary Payment Arrangement/Forbearance	581	Whole Loan Purchase Source
191	NHA MBS Pool Number	582	Servicing and Administration Provider
192	Issuer Loan Number	585	Source of Debt Service Coverage Ratio
193	Insurer Account Number	589	Risk Rating Model Used
194	Registered Titleholder	594	Risk-weighted Asset Amount

ID# ²	Data Field Name – Personal Loans and Leases	ID#	Data Field Name – Commercial Loans and Leases
195	Mortgage Registration Number	605	Number of Properties
196	NHA MBS Pool Administrator	608	Capitalization Rate
198	Stressed GDS	656	Principal Operators (Secondary)
200	Stressed TDS	657	Type of Debt Ratio
205	Co-lending LTV	658	Debt-to-Equity Ratio or Debt-to-Tangible Net Worth
259	Borrower Occupation	659	Current Ratio/Liquidity Ratio
263	Residency Status	661	Business Credit Score [Latest]
264	New to Canada	662	Date of Business Credit Score [Latest]
265	Temporary Worker	663	Business Bankruptcy Score at Origination
268	Address of Employer	668	Net Worth (Combined)
284	Rental Discount Factor	669	Nominal Amount of Guarantee
		670	Indebtedness of Guarantor
		671	External Referral
		672	Name of External Referral
		674	Reason for Deferral
		677	Borrower Membership Tenure
		678	Broker Commission
		674	Reason for Deferral

ID# ² Data Field Name – Personal Loans and Leases		ID# Data Field Name – Commercial Loans and Leases	
Data fields moved out-of-scope of the LDR consultation:			
221	Floor Area	612	Floor area
222	General Property Insurance	613	Commercial Property Insurance Coverage
223	Property Insurer	614	Property Insurer
224	Base Insurance Premium	615	Commercial Property Insurance Premium
225	Base Insurance Deductible	616	Commercial Property Insurance Deductible
226	Base Insurance Limit - Dwelling	617	Commercial Property Insurance Limit
227	Base Insurance Limit - Detached Private Buildings	618	Earthquake Coverage
228	Base Insurance Limit - Personal Property	619	Earthquake Insurance Premium
229	Base Insurance Limit - Additional Living Expense	620	Earthquake Insurance Deductible
230	Earthquake Coverage	621	Earthquake Insurance Limit
231	Earthquake Insurance Premium	622	Sewer Backup Coverage
232	Earthquake Insurance Deductible	623	Sewer Backup Insurance Premium
233	Earthquake Insurance Limit	624	Sewer Backup Insurance Deductible
234	Sewer Backup Coverage	625	Sewer Backup Insurance Limit
235	Sewer Backup Insurance Premium	626	Overland Flood Coverage
236	Sewer Backup Insurance Deductible	627	Overland Flood Insurance Premium
237	Sewer Backup Insurance Limit	628	Overland Flood Insurance Deductible

ID# ²	Data Field Name – Personal Loans and Leases	ID#	Data Field Name – Commercial Loans and Leases
238	Overland Flood Coverage	629	Overland Flood Insurance Limit
239	Overland Flood Insurance Premium	630	Loss Assessment Coverage
240	Overland Flood Insurance Deductible	631	Loss Assessment Insurance Premium
241	Overland Flood Insurance Limit	632	Loss Assessment Insurance Deductible
242	Loss Assessment Coverage	633	Loss Assessment Insurance Limit
243	Loss Assessment Insurance Premium	634	Business Interruption Coverage
244	Loss Assessment Insurance Deductible	635	Business Interruption Insurance Premium
245	Loss Assessment Insurance Limit	636	Business Interruption Insurance Deductible
246	Rent or Rental Value Coverage	637	Business Interruption Insurance Limit
247	Rent or Rental Value Insurance Premium	638	Builder’s Risk Insurance Coverage
248	Rent or Rental Value Insurance Deductible	639	Builder’s Risk Insurance Premium
249	Rent or Rental Value Insurance Limit	640	Builder’s Risk Insurance Deductible
250	Greenhouse Gas Emissions - Scope 1 & 2	641	Builder’s Risk Insurance Limit
251	Energy Consumption - Electricity	642	Greenhouse Gas Emissions - Scope 1 & 2
252	Energy Consumption - Natural Gas	643	Greenhouse Gas Emissions - Scope 3
253	Energy Consumption - Oil	644	Energy Consumption - Electricity
		645	Energy Consumption - Natural Gas
		646	Energy Consumption - Oil



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