

# MONTANA CREDIT UNION RECORDS RETENTION SCHEDULE

## APPENDIX A TO A.R.M. 2.59.405

Effective August 11, 2014

This Appendix lists minimum retention periods for many types of credit union records. The list is not all-inclusive but includes most common types of corporate, accounting and customer relationship records maintained by credit unions. For ease of reference, records may be listed under more than one heading. If a retention period conflict exists between or among ARM 2.59.405 and other state or federal laws or rules, the law or rule requiring the longer retention period shall govern. If no other specific retention requirement exists, the credit union's board of directors may set a retention period in accordance with ARM 2.59.405(6).

For other types of records not listed in this Appendix (personnel records, for example) there may be specific other laws that govern.

RETENTION PERIODS FOR "MEMBER ACCOUNT RECORDS" ARE GOVERNED BY ARM 2.59.405(1) RATHER THAN BY THIS APPENDIX. THE TERM "MEMBER ACCOUNT RECORDS" IS DEFINED IN ARM 2.59.405(7).

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\*AAC = After Account Closing

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### CREDIT UNIONS

Accounting Records	Retention Requirements
Accrual Records	3 years
Asset/Liability Management Records	3 years
Audit (internal and external) Report	Permanent
Audit (internal) Work Papers	3 years
Budget Report	2 years
Call Reports (5300's)	Permanent
Deferred Loan Fee Record	2 years after examination
Dormant Account Records	Permanent
Escheated Documents	Permanent
FDIC Assessment Base Records	5 years
General Ledger	Permanent
General Ledger Tickets	5 years
General Ledger Transaction Report	Permanent
Income and Dividend Reports	8 years
Journal Entries	8 years
Journal and Cash Record	Permanent
Reserve Requirement Computations	2 years
Monthly Loans Purchased Report	8 years
Monthly Loans Sold Report	8 years
Overdraft Reports	5 years
Paid Bills and Invoices	8 years
Paid Check/Share Draft Listings	8 years
Periodic Statements of Members, or the Individual	
Share and loan ledger (complete copies)	Permanent
Real Estate Held for Redemption History	8 years

\*AAC = After Account Closing

Statement of Condition, including balance Sheet and income statement:	
Daily	2 years
Annual	Permanent

<b>Administrative and Corporate Records</b>	<b>Retention Requirements</b>
Affidavits	7 years
Annual Reports to Members	Permanent
Application for Membership	Permanent
Articles of Incorporation	Permanent
Attachments (garnishments, liens, levies)	4 years after close
Audit Reports (External)	Permanent
Audit Reports (Internal)	6 years
Ballots and Proxies	6 years
Bank Reconciliation	Permanent
Branch Applications	Permanent
Bylaws and Amendments	Permanent
Certificates or Licenses to Operate Under Programs of Various Government Agencies, Such as a Certificate to act as issuing agent for the sale of U.S. Savings Bonds	Permanent
Charitable contributions	7 years
Charter	Permanent
Civil Actions	8 years
Contracts and Leases (with banks, service bureaus)	8 years after termination
Corporate Bylaws	Permanent
Corporate Charter	Permanent
Court Case Records	4 years after satisfaction
Court Orders	8 years
Credit Union Examiners' Records	Permanent
Director Reports (if separate from minutes)	3 years
Examination Reports	Permanent
Executive Officers	Permanent
Indebtedness to Correspondent Credit Unions Record	3 years
Executive Committee Reports (if separate from minutes)	3 years
Insurance Claims	Permanent
Insurance Records:	
Bankers Blanket bond	6 years after expiration
D & O Liability Policy	6 years after expiration
Group Disability Policy	6 years after expiration
Journal of Destroyed Records	Permanent

\*AAC = After Account Closing

Journal of Microfilmed Records	Permanent
Legal Correspondence	8 years
Legal/Tax Decision or Ruling	Expiration
Licenses and Permits	8 years after expiration
Loans to Executive Officers and Directors	3 years
Minutes of Board of Director Meetings	Permanent
Minutes of Credit Committee Meetings	Permanent
Minutes of Membership Committee Meetings	Permanent
Minutes of Supervisory Committee Meetings	Permanent
Supervisory Committee Comprehensive Annual Audit Report And attachments (one copy of each)	Permanent
Supervisory Committee Record of Account Verification	Permanent
Tax Returns/Reports	8 years

### **Bank Secrecy Act (BSA)**

### **Retention Requirements**

All Required Forms and Records	5 years
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### **Collateral**

### **Retention Requirements**

Collateral Receipts	2 years after payoff
Collateral Register	4 years
Pledge Agreement	2 years AAC*

### **Collections**

### **Retention Requirements**

Collection Letters and Receipts (incoming and outgoing)	2 years
Collection Register	3 years
Collection Note Register	2 years after close
Coupon Cash Letters (outgoing)	6 months
List of Cash Items	1 year after collection
Savings Bond Records	3 years

### **Commercial/Member Business Loans**

### **Retention Requirements**

Annual Financial Reports and Customer Operating Statements	6 years
Applications:	
Approved	6 years AAC*
Denied	25 months
Appraisals	1 year AAC*
Bankruptcy Notices	Permanent
Borrowers' Financial Statements	3 years
Canceled Notes	3 years

\*AAC = After Account Closing

Charged-Off-Notes and Records	Permanent
Collateral Records and Receipts	5 years AAC*
Correspondence	6 years AAC*
Credit Files	5 years AAC*
Debit and Credit Tickets	1 year
Disbursements Vouchers	6 years
Disclosure records	3 years
Judgments	20 years
Credit committee minutes	6 years
Loan Histories	6 years AAC*
Note (paid)	6 years AAC*
Overdraft loan agreement	6 years AAC*
Participation agreement	6 years AAC*
Pledge agreement	6 years

### **Consumer Loans**

### **Retention Requirements**

Applications:	
Approved	8 years AAC*
Denied	25 months
Bankruptcy Notices	Permanent
Borrowers' Financial Statements	3 years
Canceled Notes	3 years
Charged-Off-Notes and Records	Permanent
Collateral Records and Receipts	8 years AAC*
Consumer Credit Drafts	8 years
Correspondence	3 years
Credit Committee Report	6 years AAC
Credit Files	8 years AAC*
Daily Proof Sheets	1 year
Dealer Commitment Letters	8 years
Dealer Ledgers	2 years
Dealer Remittance Sheets	1 year
Dealer Customer Identification	5 years
Disclosure Statements	2 years
Insurance Verification	7 years AAC*
Loans Paid Report	6 years
Loan Payment Record	8 years
Loan Policies	Permanent
Loan Worksheet	7 years

\*AAC = After Account Closing

Note or Discount Tickler	2 years
Notice of Adverse Action	25 months
Overdraft Loan Agreement	8 years AAC*
Paid Notes	8 years AAC*
Rebate Receipt	6 years
Rejected Credit Files:	
Applications	3 years
Correspondence	3 years
Credit Reports	3 years
Resolution	8 years AAC*
Student Loan Records	8 years AAC*
Teller Sheet	2 years

<b>Corporate Credit Union Borrowings</b>	<b>Retention Requirements</b>
Borrowing agreements	2 years after expiration
Collateral receipts	3 years after payoff
Correspondence	2 years after payoff
Notes	2 years after payoff
Verification	2 years after payoff
Withdrawal receipts	2 years after payoff

<b>Corporate Credit Union/Due From Bank Accounts</b>	<b>Retention Requirements</b>
Advices	2 years
Drafts	1 year after paid
Reconciliation Register	3 years
Statements	2 years

<b>Credit/Debit Cards</b>	<b>Retention Requirements</b>
Account History	6 years AAC*
Applications:	
Approved	6 years AAC*
Denied	25 months
Charged-off Loan Records	Permanent
Correspondence	3 years
Credit Files	3 years
Disclosure Statements	2 years
Merchant Agreements	6 years
Payment Records	6 years
Sales Tickets or Drafts:	
By-product of Posting	2 years
Used as Original Entry	6 years

\*AAC = After Account Closing

<b>Statements:</b>	
Cardholder	6 years
Merchants	6 years
<b>Transaction Journals:</b>	
By-product of Posting	2 years
Used as Original Entry	6 years
Trial Balances	3 years

<b>Electronic Data Processing</b>	<b>Retention Requirements</b>
Computer Control Report	1 year
Computer Entry Journal	1 year
<b>Computer Files:</b>	
On-line CRT	3 cycles
On-line Terminals	3 cycles
Computer Ledger Control	1 year
Computer Reject Listing	1 year
Computer Transaction Journal	1 year
<b>Internal Control Documents:</b>	
Computer Operating Logs	3 months after exam
Input and Output Logs	3 months after exam
Run Books	3 months after exam
Overdraft Notices and Reports	1 year
Program Documentation	Life of Program + 1 year
Program Change Log	Life of Program + 1 year
Program Modifications	Life of Program + 1 year
Program Test Data and Results	Life of Program + 1 year
<b>Tape Retention:</b>	
Application Interface Tapes	5 cycles + 7 days
Application Month-end Fiche Tapes	2 cycles + 60 days
Application Transaction Tapes	5 cycles + 7 days
Daily Application Backups	5 cycles + 7 days
Fiche Tapes	3 cycles + 3 days
Month-end Application Backups	13 cycles + 403 days
System Backups	5 cycles + 7 days
Year-end Application Backups	7 years
<b>Transactions Records:</b>	
Discs	3 cycles
Magnetic Cards, Cells, Drums, Tapes	3 cycles

<b>Electronic Funds Transfers</b>	<b>Retention Requirements</b>
Error resolution log	2 years
Regulation E, evidence of compliance	2 years
Wire copies or advices	5 years
Wire Transfer debit and credit entries	5 years
Wire Transfer log	5 years

<b>Electronic Funds Transfer Act (EFTA)</b>	<b>Retention Requirements</b>
Policy or Procedure indicating that disclosures And other Documentation have been given	Permanent

<b>Fair Credit Reporting Act (FCRA)</b>	<b>Retention Requirements</b>
Notice of Credit Denial (Adverse Action)	2 years
Records of Information Released to Users Of Credit Reports	2 years
The following records should not be reported to credit bureaus after the time stated:	
Records of Accounts Charged Off or Placed for Collection	No longer than 7 years
Records of Bankruptcies	No longer than 14 years
Records of Convictions, Indictments or Arrests	No longer than 7 years from end of sentence or indictment, or arrest
Records of Paid Tax Liens	No longer than 7 years
Records of Suits/Judgment	No longer than 7 years

<b>Fixed Assets</b>	<b>Retention Requirements</b>
Building Contracts, Sub-Contracts, Waivers	8 years
Deeds	Life + 2 years
Depreciation Schedules	Life + 7 years
Insurance Policies	Term and Claim Period
Inventory Records	Life + 7 years
Invoices	Life + 7 years
Leases	Life + 6 Years
Maintenance Contracts	Life + 2 years
Personal Property Returns	8 years

<b>Home Mortgage Disclosure Act (HMDA)</b>	<b>Retention Requirements</b>
Loan/Application Register (Form FR HMDA-LAR)	5 years



## Internal Revenue Service

Retention Period: IRS regulations do not provide for a minimum retention period for information reporting forms. As a general guideline, reporting forms should be maintained for a period of seven years after the date reporting of information is required. Records may be microfilmed at any time.

Types of Information Returns (not inclusive):

- 1099-INT – Dividend Reporting
- 1099-MISC – Recipients of Miscellaneous Income
- 1098 – Mortgage Interest
- W-9 or Substitute Form for Verification of Tax ID Number
- IRA Transaction Reporting 1099-R, W2-P, 5498

Investments	Retention Requirements
Bond amortization records	6 years
Bond appraisals	3 years
Bond ledger and portfolio:	
Confirmations	3 years
Correspondence	3 years
Safekeeping records and receipts	4 years
Brokers' invoice	3 years
Brokers' statements	3 years
Credit information used to evaluate securities	3 years
Descriptive literature on securities	3 years
Discount brokerage account records	3 years
FHLMC loan files	Permanent
GNMA certificates	7 years after maturity or sale
Government securities broker/dealer	
From G-FIN-4	3 years AAC*
Lost or stolen securities (Form X-17-1A)	3 years
Monthly remittance reports	7 years after maturity
Mortgage backed securities:	
Buy and sell agreement	3 years after maturity
Commitment letter	3 years after maturity
Prospectus for securities	3 years after maturity
Safekeeping records and receipts	4 years AAC*
Securities transaction records	4 years

\*AAC = After Account Closing

<b>Official Checks, Drafts, Certified Checks</b>	<b>Retention Requirements</b>
Affidavits, Bonds of indemnity and all Pertinent information pertaining to issuance	
Of duplicate checks	Permanent
All official checks – copy	8 years after paid
Cashiers check – paid	6 years
Cashiers check register, after payment:	
By-product of posting	2 years
Used as original entry	7 years
Checks Paid (any kind)	8 years
Certified check Register (after payment)	
By-Product of Posting	2 years
Used as Original Entry	6 years
Drafts paid	6 years
Drafts register, after payment:	
By-product of posting	2 years
Used as original entry	6 years
Expense Vouchers Debit Invoices	5 years
Interest and dividend checks paid	6 years
Money Orders, Paid	6 years
Money Order Register (after payment)	
By-Product of Posting	2 years
Used as Original Entry	6 years
Paid Checks (any kind)	8 years
Stop Payment Correspondence	8 years
Travelers checks (agency purchase)	2 years

<b>Operations</b>	<b>Retention Requirements</b>
Proof/Clearing/Transits Advices of Corrections of Deposit	2 years
Clearinghouse Settlement Sheets	2 years
Corrections and Adjustments	2 years
Departmental or Tellers' Proof Sheets	2 years
Deposit Proof Sheets or Tapes	2 years
In clearing Envelope, Proof Sheets	2 years
Out Clearing Proof Sheets or Tapes	2 years
Outgoing Cash Letters	2 years
Return Item Letters, Checks Not Paid	2 years

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<b>Personnel</b>	<b>Retention Requirements</b>
Advertisements	2 years
Applications Declined	2 years
Employee Benefit Plans	
Applications	Employment + 3 years
Benefit Committee Minutes	Permanent
Benefit Plan	Life + 5 years
Claim Records	6 years
Group Policies	Life + 2 years
Pension Plans & Annual Reports	Permanent
Profit Sharing Plan & Records	Permanent
Employment History Record	
Personnel Action Records	Employment + 2 years
Salary Contracts	Employment + 6 years
Time Cards	7 years
Work Schedules	2 years
Tax Information	
940,941,941C, W-2, W-3, W-4	7 years
Unemployment Compensation	
Claim Payment Records	5 years
Claims	5 years
Fund Records	5 years
Workmen's Compensation	
Policy	Life + claim period
Record for Claims	5 years after settlement

<b>Proof, Clearings and Transit</b>	<b>Retention Requirements</b>
Advices of corrections to deposits	2 years
Balancing Forms	2 years
Clearinghouse settlement sheets	2 years
Copies of advices of corrections	2 years
Corrections and adjustments	6 months
Departmental or teller's proof sheets	1 year
Deposit proof sheets or tapes	1 year
In clearing envelope, proof sheets or tapes	1 year
Out clearing (cash letters) proof sheets or tapes	1 year
Return item letters, checks not paid	1 year

**Member Relationship Accounts****Retention Requirements**

Applications:	
Approved	6 years AAC*
Denied	25 months
Appraisals	1 year AAC*
Assumptions:	
Assignment of escrow	Life of loan
Assumption letter	Life of loan
Annual reports and customer statements	7 years
Change of address records	1 year
Charged-off records	Permanent
Collateral files	5 years AAC*
Commitment letters	5 years AAC*
Construction loan forms:	
Construction progress certification	7 years AAC*
Contractor's cost breakdown	7 years AAC*
Final inspection	7 years AAC*
Loan in progress card	7 years AAC*
Orders to pay contractor or vender	7 years AAC*
Residential construction inspection cards	7 years AAC*
Specifications and lists of materials	7 years AAC*
Correspondence	3 years AAC*
Credit files	5 years AAC*
Deed of trust	7 years AAC*
Evidence of compliance with:	
Community reinvestment act	2 years AAC*
Fair credit reporting act	25 months AAC*
Home mortgage disclosure act (Regulation C)	5 years AAC*
Real Estate Settlement Procedures Act	
Regulation X	2 years AAC*
Regulation Z	2 years
FHA bank statements	5 years
Flood insurance certificate	Life of loan
Insurance policies	1 year after expiration
Lenders request of termination of home mortgage insurance	7 years AAC*
Liability ledgers:	
By-product of posting	2 years AAC*
Used as original entry	7 years AAC*
Loan agreement	5 years AAC*

\*AAC = After Account Closing

Loan committee minutes	6 years
Loan origination case file (HUD/FHA)	2 years AAC*
Loan settlement statement	7 years AAC*
Loan subordination agreement	7 years AAC*
Mortgage	7 years AAC*
Mortgage extension agreement	7 years AAC*
Mortgage payment coupons	1 year
Mortgage receipts	1 year
Notice of adverse action	25 months
Payoff statement	6 months
Payment history record	5 years AAC*
Promissory note	7 years AAC*
Property insurance certification	7 years AAC*
Remittances, serviced mortgages	6 years AAC*
Request for verification of deposit	7 years AAC*
Statement of estimated settlement charges	7 years AAC*
Tax bills	Life of loan
Transaction journal:	
By-product of posting	2 years
Used as original entry	6 years
Trial balance	4 years

<b>Real Estate Owned</b>	<b>Retention Requirements</b>
Accounting Records	6 years after disposal
Deeds	Until disposed of
Insurance Policies	2 years after expired
Lease and Rental Agreements	2 years after term expired
Maintenance Contracts	2 years after term expired
REO Income & Expense Records	6 years

<b>Security</b>	<b>Retention Requirements</b>
Evidence of compliance with standards for installation of security devices (Regulation P)	2 years
Management certification of compliance with Bank Protection Act	3 years
Reports of robberies, burglaries, nonemployee larcenies committed or attempted	Permanent

<b>Tellers</b>	<b>Retention Requirements</b>
Bank by mail envelopes	6 months
Cash reconciliation to general ledger	3 years
Currency transaction reports	5 years
Night Depository agreements	2 years after closed
Night depository envelopes	6 months
Night depository log	2 years
Tellers' cash tickets	2 years
Tellers' difference/outage record	2 years
Tellers' individual balancing sheets	2 years
Tellers' machine tapes	2 years
Vault records	1 year