

# Protection of Public Deposits

Connecticut Government Finance Officers Association  
Quarterly Meeting  
February 5, 2009  
Rocky Hill Marriott  
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Banking

# Agenda

- Introduction
- Review of Statutes and Regulations
- DOB Public Deposit Reporting Requirements and Monitoring
- Useful Sources of Information on Banks and Credit Unions
- Questions and Comments

# Introduction



# DOB Organization

- Protection of Public Deposits oversight is performed by the Financial Institutions Division (FID).
- Other Divisions provide oversight for Securities and Consumer Credit.

# Relevant Statutes and Regulations

- Connecticut General Statutes Sections 36a-330 to 36a-338
- Regulations of Connecticut State Agencies Sections 36a-332 to 36a-333

# Protection of Public Deposits

## What is a Public Deposit?

- PART III
- PROTECTION OF PUBLIC DEPOSITS
- Connecticut General Statutes
- Sec. 36a-330. (Formerly Sec. 36-382).
- (4) “Public deposit” means (A) moneys of this state or of any governmental subdivision of this state or any commission, committee, board or officer thereof, any housing authority or any court of this state and (B) moneys held by the Judicial Department in a fiduciary capacity;

# Protection of Public Deposits

## What is a Qualified Public Depository?

- **Connecticut General Statutes, as amended by section 1 of public act 08-39**
- (5) “Qualified public depository” or “depository” means a bank, Connecticut credit union, federal credit union or an out-of-state bank that maintains in this state a branch, as defined in section 36a-410, which receives or holds public deposits and (i) segregates eligible collateral for public deposits as described in section 36a-333, or (ii) arranges for a letter of credit to be issued in accordance with section 36a-337.
- (1967, P.A. 517, S. 1; P.A. 77-614, S. 156, 587, 610; P.A. 78-303, S. 85, 136; P.A. 80-482, S. 259, 345, 348; P.A. 81-193, S. 11, 16; P.A. 83-331, S. 3; P.A. 84-510, S. 1, 5; P.A. 87-9, S. 2, 3; P.A. 91-245, S. 1; P.A. 92-12, S. 78; P.A. 94-122, S. 155, 340; P.A. 95-155, S. 22, 29; P.A. 08-39, S. 1.)

# Protection of Public Deposits

## What is a Qualified Public Depository?

- **Regs. Sec. 36a-332-2. Requirements for qualification as qualified public depository**
- In order to qualify as a qualified public depository, a financial institution shall:
  - (1) Have its principal office in Connecticut, except in the case of an out-of-state bank that maintains in this state a branch as defined in section 36a-410 of the Connecticut General Statutes.
  - (2) In the case of a Connecticut credit union, comply with the net worth requirement of section 36a-441a of the Connecticut General Statutes.
  - (3) In the case of a federal credit union, comply with the net worth requirement of 12 CFR 702.
  - (4) Have assets which shall at all times exceed its liabilities.
- (Effective July 31, 2006)

# Protection of Public Deposits

- **Sec. 36a-336. (Formerly Sec. 36-389). Public deposits in qualified public depository or out-of-state bank.** No public deposit shall be made except in a qualified public depository or in an out-of-state bank if (1) the deposit is permitted by a statute of this state and (2) such out-of-state bank provides eligible collateral for such deposit in excess of the Federal Deposit Insurance Corporation insurance limit in an amount satisfactory to the public depositor but in any event affording protection at least equal to that provided under sections 36a-330 to 36a-338, inclusive.
- (1967, P.A. 517, S. 8; P.A. 81-193, S. 14, 16; P.A. 92-12, S. 80; P.A. 94-7, S. 3; 94-122, S. 160, 340.)

# Protection of Public Deposits

## Other Requirements of a Qualified Public Depository?

- **Sec. 36a-332-8. Total capital**

- (a) For purposes of sections 36a-332-1 to 36a-332-7, inclusive, and sections 36a-333-1 and 36a-333-2 of the Regulations of Connecticut State Agencies, in the case of a bank or an out-of-state bank that maintains in this state a branch as defined in section 36a-410 of the Connecticut General Statutes, “total capital” shall be determined in accordance with applicable federal regulations concerning “qualifying total capital” or “total capital” as the case may be. For purposes of this subsection, “federal regulations” means the capital guidelines adopted by the Federal Deposit Insurance Corporation, 12 C.F.R. Part 325, Appendix A; the Office of the Comptroller of the Currency, 12 C.F.R. Part 3, Appendix A; the Board of Governors of the Federal Reserve System, 12 C.F.R. Part 208, Appendix A; or the Office of Thrift Supervision, 12 C.F.R. Part 567, as from time to time amended.

- (Effective January 30, 1996)

- (b) For purposes of sections 36a-332-1 to 36a-332-7, inclusive, of the Regulations of Connecticut State Agencies, in the case of a Connecticut credit union and a federal credit union, “total capital” means the total of all reserves plus undivided earnings.

- (Effective July 31, 2006)

- **Protection of Public Deposits**

- **Sec. 36a-333-1. Risk-based capital ratio**

- (a) In the case of a bank or an out-of-state bank that maintains in this state a branch as defined in section 36a-410 of the Connecticut General Statutes, “risk-based capital ratio” shall be determined in accordance with applicable federal regulations concerning “qualifying risk-based capital ratio” or “risk-based capital ratio” as the case may be. For purposes of this subsection, “federal regulations” means capital guidelines adopted by the Federal Deposit Insurance Corporation, 12 C.F.R. Part 325, Appendix A; the Office of the Comptroller of the Currency, 12 C.F.R. Part 3, Appendix A; the Board of Governors of the Federal Reserve System, 12 C.F.R. Part 208, Appendix A; or the Office of Thrift Supervision, 12 C.F.R. Part 567, as from time to time amended.

# Protection of Public Deposits

## Other Requirements of a Qualified Public Depository?

- **Sec. 36a-332-5. Requirements for the transfer of eligible collateral**
- (a) Prior to the transfer of eligible collateral to a financial institution serving as trustee or the designation of collateral already in the custody of such financial institution as eligible collateral, the qualified public depository shall receive written confirmation in the form of a certified notice from such financial institution that it is in compliance with section 36a-332-4 of the Regulations of Connecticut State Agencies and forward a copy of the confirmation to the commissioner.
- (b) Each qualified public depository shall enter into a written trust agreement with the financial institution, federal reserve bank or federal home loan bank serving as trustee. Such agreement shall identify that the collateral to be transferred or designated is eligible collateral subject to the requirements of part III of chapter 665a of the Connecticut General Statutes, governing public deposits, and sections 36a-332-1 to 36a-332-8, inclusive, and sections 36a-333-1 and 36a-333-2 of the Regulations of Connecticut State Agencies.
- (c) Each transfer or designation of eligible collateral shall be accompanied by a certified statement from the qualified public depository showing the par value or original face amount, current par value, description and interest rate, CUSIP number, maturity date, market value and security rating, where applicable, of the eligible collateral being transferred or designated and the name of the financial institution, federal reserve bank or federal home loan bank serving as trustee receiving or holding such collateral. A copy of the certified statement shall be maintained on file with the qualified public depository.
- (Effective July 31, 2006)
- **Sec. 36a-332-6. Valuation of eligible collateral**
- When the market value of eligible collateral is not readily determinable, its value shall be based on a written appraisal performed by an independent certified appraiser knowledgeable in the valuation of the type of collateral.
- (Effective April 24, 1995)

# Protection of Public Deposits

## Other Requirements of a Qualified Public Depository?

- **Regs. Sec. 36a-332-3. Other terms and conditions**
- (a) No qualified public depository shall maintain eligible collateral in its own trust department unless such depository is authorized under law to exercise fiduciary powers in this state.
- (b) Concurrent with receipt of a public deposit, a qualified public depository shall transfer eligible collateral to secure such public deposit in accordance with section 36a-333 of the Connecticut General Statutes.
- (c) A qualified public depository shall maintain records including but not limited to a full report of all public deposits by depositor name and location, account name, account number, amount and Federal Employer Identification Number (FEIN).
- (d) A qualified public depository shall not charge costs, fees or expenses incidental to the transfer or maintenance of eligible collateral against the required amount of eligible collateral.
- (e) Each qualified public depository shall permit the commissioner or any authorized employee of the department of banking to inspect, verify and review all documents, reports, records and all other financial information deemed necessary to verify compliance with part III of chapter 665a of the Connecticut General Statutes and these regulations.
- (f) If during any calendar quarter after the issuance of its call report, the qualified public depository determines that pursuant to section 36a-333 of the Connecticut General Statutes, it is required to increase the amount of eligible collateral maintained by it, it shall immediately increase such collateral to the amount required and shall immediately thereafter give written notification of its action to the commissioner and to its public depositors. Such notification shall include, but not be limited to, the depository's current risk-based capital ratio and the amount, nature and value of the additional eligible collateral segregated and designated therefor in accordance with part III of chapter 665a of the Connecticut General Statutes and these regulations.
- (g) Any qualified public depository that ceases to be a qualified public depository or no longer wishes to be a qualified public depository shall no longer receive public deposits and shall give immediate notice to the commissioner, who shall thereupon instruct such qualified public depository of the procedures to be followed with respect to the return of public deposits and eligible collateral.
- (Effective April 24, 1995)

# Protection of Public Deposits

## Trustee Requirements

- **Sec. 36a-332-4. Requirements for financial institutions to serve as trustee for segregated eligible collateral**
- No financial institution shall accept a transfer of eligible collateral from a qualified public depository pursuant to subsection (b) of section 36a-333 of the Connecticut General Statutes unless such financial institution (1) is authorized under law to exercise fiduciary powers in this state, (2) meets the requirements of section 36a-332-2 of the Regulations of Connecticut State Agencies, as applicable, and (3) is federally insured or receives the approval of the commissioner. If a financial institution ceases to meet such requirements, it shall give immediate notice to the qualified public depository and the commissioner who shall thereupon instruct such institution with respect to the disposition of eligible collateral.
- (Effective July 31, 2006)

# Protection of Public Deposits

## What are the Powers of the Commissioner?

- **Sec. 36a-332. (Formerly Sec. 36-385). Powers of commissioner.** (a) The commissioner has the power (1) to require any qualified public depository to furnish such information as the commissioner shall request. Any public depository which refuses or neglects to give any information so requested shall no longer be a qualified public depository and shall be excluded from the right to receive public deposits; (2) to take such action as the commissioner deems best for the protection, collection, compromise or settlement of any claim arising in case of loss; and (3) to fix the official date on which any loss shall be deemed to have occurred taking into consideration the orders, rules and regulations of any supervisory authority as they affect the failure or inability of a qualified public depository to repay public deposits in full.
- (b) The commissioner shall adopt regulations, in accordance with the provisions of chapter 54, to administer the provisions of sections 36a-330 to 36a-338, inclusive. Such regulations shall establish (1) requirements for the qualification of financial institutions as qualified public depositories, (2) other terms and conditions consistent with sections 36a-330 to 36a-338, inclusive, under which public deposits may be received and held, (3) requirements for financial institutions eligible to serve as trustees for segregated eligible collateral under subsection (b) of section 36a-333, (4) requirements for the transfer of eligible collateral from a qualified public depository to a financial institution serving as trustee for such collateral under subsection (b) of section 36a-333, (5) provisions governing the valuation of eligible collateral when the market value of such collateral is not readily determinable, and (6) such other provisions as the commissioner deems necessary to carry out the requirements of sections 36a-330 to 36a-338, inclusive.

# Protection of Public Deposits

- What are the Collateral Requirements?
- **Sec. 36a-333. (Formerly Sec. 36-386). Collateral requirements.** (a) To secure public deposits, each qualified public depository shall at all times maintain, segregated from its other assets as provided in subsection (b) of this section, eligible collateral in an amount at least equal to the following percentage of public deposits held by the depository: ...

# Protection of Public Deposits

- **Sec. 36a-333. (Formerly Sec. 36-386). Collateral requirements. :**
- ... (1) For any qualified public depository having a risk-based capital ratio of ten per cent or greater, a sum equal to ten per cent of all public deposits held by the depository; (2) for any qualified public depository having a risk-based capital ratio of less than ten per cent but greater than or equal to eight per cent, a sum equal to twenty-five per cent of all public deposits held by the depository; (3) for any qualified public depository having a risk-based capital ratio of less than eight per cent but greater than or equal to three per cent, a sum equal to one hundred per cent of all public deposits held by the depository; (4) for any qualified public depository having a risk-based capital ratio of less than three per cent, and, notwithstanding the provisions of subdivisions (1) to (3), inclusive, of this subsection, for any qualified public depository which has been conducting business in this state for a period of less than two years except for a qualified public depository that is a successor institution to a qualified public depository which conducted business in this state for two years or more, a sum equal to one hundred and twenty per cent of all public deposits held by the depository; provided, the qualified public depository and the public depositor may agree on an amount of eligible collateral to be maintained by the depository that is greater than the minimum amounts required under subdivisions (1) to (4), inclusive, of this subsection; (5) notwithstanding the risk-based capital ratio provisions of subdivisions (1) to (3), inclusive, of this subsection, for any qualified public depository that is an uninsured bank, a sum equal to one hundred twenty per cent of all public deposits held by the depository; and (6) notwithstanding the risk-based capital ratio provisions of subdivisions (1) to (3), inclusive, of this subsection, for any qualified public depository that is subject to an order to cease and desist, or has entered into a stipulation and agreement, or a letter of understanding and agreement with a bank or credit union supervisor, a sum equal to one hundred twenty per cent of all public deposits held by the depository, provided, the qualified public depository and the public depositor may agree on an amount of eligible collateral to be maintained by the depository that is greater than the minimum amounts required under subdivisions (1) to (6), inclusive, of this subsection.

# Protection of Public Deposits

- **Sec. 36a-333. (Formerly Sec. 36-386). Collateral requirements.**
- ... For purposes of this subsection, the amount of all public deposits held by the depository shall be determined based on either the public deposits reported on the most recent written report filed with the commissioner pursuant to section 36a-338 or the average of the public deposits reported on the four such most recent written reports, whichever amount is greater. For purposes of this subsection, the depository's risk-based capital ratio shall be determined, in accordance with applicable federal regulations and regulations adopted by the commissioner in accordance with chapter 54, based on the most recent quarterly call report, provided (A) if, during any calendar quarter after the issuance of such report, the depository experiences a decline in its risk-based capital ratio to a level that would require the depository to maintain a higher amount of eligible collateral under subdivisions (1) to (4), inclusive, of this subsection, the depository shall increase the amount of eligible collateral maintained by it to the minimum required under subdivisions (1) to (4), inclusive, of this subsection based on such lower risk-based capital ratio and shall notify the commissioner of its actions; and (B) if, during any calendar quarter after the issuance of such report, the commissioner reasonably determines that the depository's risk-based capital ratio is likely to decline to a level that would require the depository to maintain a higher amount of eligible collateral under subdivisions (1) to (4), inclusive, of this subsection, the commissioner may require that the depository increase the amount of eligible collateral maintained by it to the minimum required under subdivisions (1) to (4), inclusive, of this subsection based on the commissioner's determination of such lower risk-based capital ratio.

# Protection of Public Deposits

- **Sec. 36a-333. (Formerly Sec. 36-386). Collateral requirements.**
- (b) Each qualified public depository having a risk-based capital ratio of eight per cent or greater shall transfer eligible collateral maintained under subsection (a) of this section to its own trust department, provided such trust department is located in this state unless the commissioner approves otherwise, to the trust department of another financial institution, provided such eligible collateral shall be maintained in such other financial institution's trust department located in this state unless the commissioner approves otherwise, or to a federal reserve bank or federal home loan bank. Each qualified public depository having a risk-based capital ratio of less than eight per cent shall transfer eligible collateral maintained under subsection (a) of this section to the trust department of a financial institution that is not owned or controlled by the depository or by a holding company owning or controlling the depository, provided such eligible collateral shall be maintained in such other financial institution's trust department located in this state unless the commissioner approves otherwise, or to a federal reserve bank or federal home loan bank. Such transfers of eligible collateral shall be made in a manner prescribed by the commissioner. Eligible collateral shall be valued at market value or as determined by the commissioner if market value is not readily determinable, and the value of such eligible collateral shall be determined and adjusted on a quarterly basis. Without the requirement of any further action, the commissioner shall have, for the benefit of public depositors, a perfected security interest in all such eligible collateral held in such segregated trust accounts, granted pursuant to and in accordance with the terms of the agreement between the public depositor and the qualified public depository. Such security interest shall have priority over all other perfected security interests and liens.
- (c) The depository shall have the right to make substitutions of eligible collateral at any time without notice. The depository shall have the right to reduce the amount of eligible collateral maintained under subsection (a) of this section provided such reduction shall be determined based on the amount of all public deposits held by the depository and the depository's risk-based capital ratio as determined in accordance with said subsection (a). The depository shall provide written notice to its public depositors of any such reduction in the amount of eligible collateral maintained under subsection (a) of this section.
- (d) The income from the assets which constitute segregated eligible collateral shall belong to the depository without restriction.
- (e) Eligible collateral pledged to secure public deposits under subsection (a) of this section shall have a minimum market value as expressed in the following collateral ratios:

# Form of Eligible Collateral

Collateral Ratio - Form of Eligible (Market value Collateral Pledged divided by public deposit plus accrued interest)

- 1. United States Treasury bills, notes and bonds
  - A. Maturing in less than one year 102%
  - B. Maturing in one to five years 105%
  - C. Maturing in more than five years 110%
  - D. Zero-coupon treasury securities with maturities exceeding ten years 120%
  
- 2. Actively traded United States government agency securities
  - A. Maturing in less than one year 103%
  - B. Maturing in one to five years 107%
  - C. Maturing in more than five years 115%
  
- 3. United States government agency variable rate securities 103%

# Form of Eligible Collateral

Collateral Ratio Form of Eligible (Market value Collateral Pledged divided by public deposit plus accrued interest)

- 4. Government National Mortgage Association mortgage pass-through or participation certificates or similar securities
  - A. Current issues 115%
  - B. Older issues 120%
  - C. Issues for which prices are not quoted 125%
  
- 5. Other United States government securities 125%
  
- 6. Other mortgage pass-through or participation certificates or similar securities 125%
  
- 7. One-to-four family residential mortgages 125%

# Form of Eligible Collateral

Collateral Ratio Form of Eligible (Market value Collateral Pledged divided by public deposit plus accrued interest)

- 8. State and municipal bonds
  - A. General obligation bonds
    - i. Maturing in less than one year 102%
    - ii. Maturing in one to five years 107%
    - iii. Maturing in more than five years 110%
  - B. Revenue bonds
    - i. Maturing in less than one year 105-110%
    - ii. Maturing in one to five years 110-120%
    - iii. Maturing in more than five years 120-130%

# Protection of Public Deposits

- **Sec. 36a-337. (Formerly Sec. 36-390). Securing of public deposits. Private insurance in lieu of eligible collateral.** (a) All qualified public depositories shall have power to secure public deposits in accordance with sections 36a-330 to 36a-338, inclusive. Except as provided in said sections, no bond or other security shall be required of or given by any qualified public depository for any public deposit.
- (b) In lieu of eligible collateral required under section 36a-333, at least to the extent provided by said section, not more than fifty per cent of the public deposits held by any qualified public depository may be secured solely by a private insurance policy purchased by the depository, the depositor, or any other third party. Any private insurance policy used to secure public deposits shall be issued by an insurance company licensed to do business in Connecticut.
- (c) In lieu of eligible collateral required under section 36a-333, public deposits held by any qualified public depository may be secured solely by an irrevocable letter of credit issued by the Federal Home Loan Bank of Boston, provided such federal home loan bank has a rating of the highest rating level from a rating service recognized by the commissioner and provided further the amount of the letter of credit, as a percentage of the public deposits, is no less than the amount required by section 36a-333 for eligible collateral for the particular depository.
- (1967, P.A. 517, S. 9; P.A. 91-177; 91-245, S. 7; P.A. 94-122, S. 161, 340; P.A. 08-39, S. 3.)

# Protection of Public Deposits

## What happens upon loss?

- **Sec. 36a-334. (Formerly Sec. 36-387). Procedure upon loss.** When the commissioner determines that a loss has occurred, the commissioner shall as soon as possible make payment to the proper public officers of all public deposits subject to such loss, pursuant to the following procedure: (1) For the purposes of determining the sums to be paid, the commissioner or receiver shall, within twenty days after issuance of a restraining order or taking possession of any qualified public depository, ascertain the amount of public deposits held by the depository as disclosed by its records and the amount thereof covered by deposit insurance and certify the amounts to each public depositor having public funds on deposit in the depository; (2) within ten days after receipt of such certification, each such public depositor shall furnish to the commissioner verified statements of its deposits in the depository as disclosed by its records plus information concerning any letters of credit issued to the public depositor pursuant to section 36a-337; (3) upon receipt of such certificate and statements, the commissioner shall ascertain and fix the amount of such public deposits, net after deduction of any deposit insurance and any amount received or to be received by the public depositor pursuant to a letter of credit issued in accordance with section 36a-337, and assess the same against the depository in which the loss occurred; (4) the assessment made by the commissioner shall be payable on the second business day following demand, and in case of the failure of the qualified public depository so to pay, the commissioner shall immediately take possession of the eligible collateral, if any, segregated by the depository pursuant to sections 36a-330 to 36a-338, inclusive, and liquidate the same for the purpose of paying such assessment; (5) upon receipt of the assessment, the commissioner shall reimburse the public depositors of the depository in which the loss occurred to the extent of the depository's net deposit liability to them.
- (1967, P.A. 517, S. 6; P.A. 77-614, S. 158, 610; P.A. 87-9, S. 2, 3; P.A. 91-245, S. 5; P.A. 92-12, S. 79; P.A. 94-122, S. 159, 340; P.A. 08-39, S. 2.)

# Protection of Public Deposits

- **Sec. 36a-335. (Formerly Sec. 36-388). Subrogation of commissioner to depositor's rights.** Upon payment to any public depositor, the commissioner shall be subrogated to all of such depositor's right, title and interest against the depository in which the loss occurred and shall share in any distribution of its assets ratably with other depositors. Any sums received from any distribution shall be paid to the public depositors to the extent of any unpaid net deposit liability. If the commissioner incurs expense in enforcing any such claim, the amount thereof shall be paid as a liquidation expense of the depository in which the loss occurred.

(1967, P.A. 517, S. 7; P.A. 77-614, S. 159, 610; P.A. 91-245, S. 6.)

# Protection of Public Deposits

## What is required to be reported to the Commissioner?

- **Sec. 36a-338. (Formerly Sec. 36-391). Report of public depository.** On each call report date, each qualified public depository shall file with the commissioner a written report, certified under oath, indicating its risk-based capital ratio and total capital, as determined in accordance with applicable federal regulations and regulations adopted by the commissioner in accordance with chapter 54, the total amount of public deposits held by it and the amount and nature of the eligible collateral segregated and designated to secure the public deposits in accordance with sections 36a-330 to 36a-338, inclusive, and the amount and the name of the issuer of any letter of credit issued pursuant to section 36a-337. Each depository shall furnish a copy of its most recent report to any public depositor having public funds on deposit in the depository, upon request of the depositor. Any public depository which refuses or neglects to furnish any report or give any information as required by this section shall no longer be a qualified public depository and shall be excluded from the right to receive public deposits.
- (1967, P.A. 517, S. 10; P.A. 77-614, S. 160, 610; P.A. 87-9, S. 2, 3; P.A. 91-245, S. 8; P.A. 94-122, S. 162, 340; P.A. 08-39, S. 4.)

# Protection of Public Deposits

## What is required to be reported to the Commissioner?

- **Regs. Sec. 36a-332-7. Reports to commissioner**
- Each qualified public depository shall file with the commissioner the following:
- (a) Call reports for each of the quarters ending March thirty-first, June thirtieth, September thirtieth and December thirty-first. Each report shall be submitted to the commissioner not later than thirty days after the date ending the quarter covered by the report.
- (b) Written reports, certified under oath, for each of the quarters ending March thirty-first, June thirtieth, September thirtieth and December thirty-first, indicating its total capital, risk-based capital ratio, public deposits, the interest or other pecuniary consideration such depository allows for or upon such deposit or payment and the amount, nature and value of the eligible collateral segregated and designated therefor in accordance with part III of chapter 665a of the Connecticut General Statutes and sections 36a-332-1 to 36a-332-8, inclusive, and sections 36a-333-1 and 36a-333-2 of the Regulations of Connecticut State Agencies. Each report shall be filed not later than thirty days after the date ending the quarter covered by the report. Each qualified public depository shall retain a copy of such reports for a period of seven years.
- (Effective July 31, 2006)

# Sources of Information

- [www.ct.gov/dob](http://www.ct.gov/dob) Statutes and Regulations, Deposits, Financial Institution Information and Data, Department Contacts
- [www.fdic.gov](http://www.fdic.gov) Call reports for Banks
- [www.ncua.gov](http://www.ncua.gov) Financial Performance and Ratios for Credit Unions

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