

Opinion 96-5 (Redacted version)

May 9, 1996

“A” Credit Union

Subject: Interpretation 96-5
on WAC 208-472-015 and WAC 208-472-041

Dear:

Thank you for your letter requesting interpretation on certain field of membership rules. Although we have discussed this information by phone, you requested a copy in writing.

For your information, the Division’s WAC rules applicable to credit unions have been moved to Title 208 WAC, effective June 1, 1996. Enclosed is a copy of our rules with the new numbering.

Below are your questions and the interpretation:

- Under WAC 208-472-015 (formerly WAC 419-72-015), issue #3 (a), regarding employees of the enterprise and their family members:

Does this mean that if we serve ABC Company, we also serve those employees’ family members immediately. Therefore, any of those family members could come into the credit union and say, “I am a family member of Joe who works at ABC Company” and the information alone qualifies them for membership.

Yes, a family member of an employee included in the field of membership qualifies whether or not the employee has already joined. In other words, family member (brother Joe) can join before the employee (brother Fred) has joined. The family member may verbally verify that he/she is eligible for membership through an employee included in the field of membership. However, documentation (such as the information that the member is related to brother Fred, employee at ABC Company) should be noted on the membership application and held at the credit union to show how the member qualified for membership.

- Under WAC 208-472-041 regarding the SOG (small occupational group) under the streamlined procedure:

Does this mean that if there is an overlap of membership qualification with another credit union, every effort must be made to obtain a letter of non-objection from the other credit union. These documents must then be sent to the state (Division of Credit Unions) for approval.

Yes, the fact that the employees of an enterprise do have credit union service available based on such employment disqualifies that enterprise from being approved through the SOG streamlined procedure. The applicant credit union would be required to provide all documentation under WAC 208-472-025 (formerly 419-72-025) and send that documentation to the Division of Credit Unions for approval.

If you have any questions, please give me a call at (360) 902-8753.

Sincerely,

Linda K. Jekel
Program Manager