

**Opinion 96-13 (Redacted version)**

September 23, 1996

“A”

Subject: Removal of Streamlined Senior Groups from FOM  
Opinion # 96-13

Dear:

As you are aware, the streamlined senior provision in our WAC rules was deleted effective September 20, 1996. This provision deemed groups of retired persons and persons at least age 50 to be an “associational group” for purposes of adding these streamlined senior groups to a credit union’s field of membership.

Our records indicate that your credit union amended its field of membership bylaws to include a streamlined senior group(s). This letter is intended to provide clarification on the effect of the deletion of the authority for these groups.

**Eligibility for membership**

Your members who joined before September 20, 1996 under a streamlined senior group may continue their membership in your credit union, if your FOM bylaws provide that “once a member, always a member”. However, after September 20, you may not qualify individuals as new members based solely on their membership in a streamlined senior group.

**Amending your FOM bylaw**

In order to “clean up” your FOM bylaws, you should submit for our approval FOM bylaw amendments that delete all streamlined senior groups. These amendments should be approved by your Board in accordance with applicable requirements, and should be submitted to the Division by November 1, 1996.

**Adding other senior groups**

It should be noted that the Division will continue to approve the addition of groups of seniors to a credit union’s FOM if the groups meet the standard associational group requirements in WAC Chapter 208-472.

Sincerely,

Linda Jekel  
Program Manager