

**Opinion 96-9 (Redacted version)**

August 22, 1996

**“A” Credit Union**

Subject: Imaging of Documents  
Opinion No. 96-9

Dear:

In follow-up to our recent phone conversation, enclosed is a copy of the following:

1. Discussion of electronic imaging systems from the Information Systems Examinations Handbook of the FFIEC.
2. FFIEC issuance SP-10, entitled “Control and Security Risks in Electronic Imaging Systems”.

Although these pronouncements have not been formally adopted by the Division, I believe they provide a good (but somewhat brief) explanation of the primary risks associated with the use of an imaging system.

As we discussed, some of the most important risks here are the legal ones - questions about the admissibility of electronic images in court, as well as whether such images satisfy record retention requirements in various federal and state laws. A knowledgeable attorney could help sort through these legal issues.

Any credit union that is interested in using an imaging system should give full consideration to the risks outlined in SP-10 and this letter.

I hope this letter is responsive to your inquiry. Feel free to give me a call if you would like to discuss this further.

Sincerely,

J. Parker Cann  
Assistant Director