

JUSTIFICATION
For a collection of Information by the National Credit Union Administration
3133-0137 Applications for Technical Assistance
September 2007

1. Explain the circumstances that make the collection of information necessary, include identification of any legal or administrative requirements that necessitate the collection.

Public Law 99-609 authorized the transfer of the administration of the Community Development Revolving Loan Fund to the NCUA Board. NCUA Rules and Regulations Part 705 authorized the use of the earnings from the program funds to provide technical assistance to credit unions. The purpose of the Technical assistance is to aid credit unions in providing service and in enhancing operations. Submission of the application is requested to ensure that the funds are used as intended by the program. The statement of proposed use of funds is unique for each credit union and is requested only once with the initial application.

2. Indicate how, by whom, and for what purpose the information is to be used and the consequence to the federal program or policy activities if the collection of information was not conducted.

The credit union's board of directors or its designated representative collects the information from the books and records of the credit union's operations. The information is used by NCUA to ensure that the funds are used to enhance member service and credit union operations.

3. Describe any considerations of the use of improved information technology to reduce burden and any technical or legal obstacles to reducing burden.

The board of directors or its designated representative uses the collection techniques of their choice to assemble the requested information. Applicants may submit responses by mail or facsimile. Other electronic submissions of responses are not available at this time. However, technology updates on the part of credit unions and NCUA may allow for electronic options in the future.

4. Describe efforts to identify duplication.

This revision does not contain any duplicity. The information requested in the application is not available from other sources. The information is submitted once only with the initial application.

5. Show specifically why any similar information already available cannot be used or modified for the purpose described in item 2 above.

Not Applicable.

6. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The burden on small credit unions is minimal. The majority of the information requested is available in the credit unions records. The additional information requested is narrative and specific to each request.

7. Describe the consequence to the federal program or policy activities if the collection were conducted less frequently.

The information requested is used to assess financial viability and suitability to receive funding under the program guidelines. Without the information, there would be no basis upon which to award grant funding. The information is requested only once and could not be collected less frequently.

8. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines of 5 C.F.R. 1320.6.

Not Applicable. The collection of information is not creating any special circumstances.

9. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, the frequency of collection, the clarity of instructions and record keeping, the disclosure of reporting format, and the data elements to be recorded, disclosed, or reported.

The Technical Assistance Application process is discussed at Regional Conferences, Credit Union meetings, League Conferences, and other Federal Agency Conferences on an ongoing basis. The credit union community provides feedback on the application process at these forums. In addition, a request for public comments on the information collection was published in the Federal Register. No comments on the information collection were received.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The information requested is general in nature and available to credit union members and the public. This request for information does not trigger any confidentiality concerns.

11. Provide additional justification for any questions of a sensitive nature, etc.

There are no questions of a sensitive nature.

12. Provide estimates of annualized cost to the Federal Government and to the respondents. Also, provide a description of the method used to estimate cost, which should include quantification of hours; operational expenses, such as equipment, overhead, printing, and support staff; and any other expense that would not have been incurred without the paperwork burden.

Frequency of responses from each credit union **ONCE**
 Number of respondents **116**

	<u>Respondents</u>		<u>Federal Government</u>
Hour Burden per application			Totals
Credit Union Staff	2.0		
NCUA / RO Staff		1.5	
NCUA / Examiner		1.5	
NCUA / Staff		<u>2.5</u>	
Total	2.0	5.5	7.5
Average hourly rate applied:			
Credit union	\$15.63		
NCUA / Staff		\$39.06	
NCUA / RO Staff / Examiners		\$31.25	
(Average Hourly rates include salary and Benefits)			
Estimated annualized hour burden:			
Credit Union Staff	116.0		
NCUA / Staff		290.0	
NCUA / RO staff		174.0	
NCUA / Examiner		<u>174.0</u>	
Totals	116.0	638.0	754.0 hrs
Estimated annualized cost:			
Credit Union Staff	\$1,813.08		
NCUA / Staff		\$11,327.40	
NCUA / RO staff		\$ 3,625.00	
NCUA / Examiners		<u>\$ 3,625.00</u>	
Total	\$1,813.08	\$18,577.40	\$20,390.48

13. Provide estimates of burden of the collection of information. The statement should: provide number of respondents, frequency of response, annual burden and an explanation of how the burden was estimated.

Basis for Hour and Cost Estimate
 Paperwork Reduction Act Submission

Government	Respondents Federal	
	(Credit Unions)	(NCUA Staff)
<i>Application for Technical Assistance</i>		
Hours to complete and process	1 hour	NCUA Analyst
2.5	Based on length of the	
RO Staff 1.5	application & extent	Examiner <u>1.5</u>
5.5	of info required	
Cost per hour to complete and analyst @ grade process application (\$75,000 /	Credit union manager	NCUA
39.06	salary in \$3 MM asset	CU-14 salary
	range; 1% or \$30,000	12/160) =
	(\$30,000/12/160 = \$15.63)	
Examiner @		RO staff &
		Grade CU -13 (\$60,000 /12/ 160 = \$31.25)

14. Explain reasons for changes in burden, including the need for any increase.

There is no increase in the information requested. Modifications clarify existing items requested.

15. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of reports, publication dates, and other actions.

There are no plans for publications of the results