

**REQUEST FOR OMB REVIEW AND APPROVAL, 3133-0004**  
**SUMMARY OF PROPOSED CHANGES TO NCUA PROFILE DATA COLLECTION**

**PROPOSED CYCLE DATE:** December 31, 2011

**REPORT(S) IMPACTED:** NCUA Profile Form

**OMB FORM #:** 3133-0004 (Expires 08/31/2012)

**PROFILE PAGE(S) IMPACTED:** Regulatory Information – Page 16 and Credit Union Programs/Services – Page 18

**SUPPORTING ATTACHMENTS:** September 2011 Profile Form – Pages 16 and 18.xlsx, Proposed December Profile Form – Pages 16 and 18.xlsx

**DESCRIPTION OF NCUA PROFILE:** The online system includes an area called the credit union profile. The profile contains information about the credit union that infrequently changes. This area includes some read-only chartering information as well as some data we formerly collected on the 5300 Call Report and Report of Official including the following categories:

- Report of Officials and other key contacts at the credit union,
- The main office and any branch offices,
- Information systems and technology services and structure,
- Disaster recovery information,
- Programs and services credit unions offer to their members,
- Regulatory compliance to include the annual financial statement audit, member account verification, and annual meeting dates, etc.
- Grants the credit union has received and any credit union partnerships they have (optional reporting),
- Credit Union Service Organizations they use and have a financial interest in.

Once a credit union enters their initial data, input is only required for additions, deletions, and changes. Under NCUA Rule and Regulations Section 741.6(a)(1), credit unions are required to update this information within ten days of the election or appointment of officials or thirty days of any other change. This data is editable by credit unions at any time through the online system. This area of NCUA's data collection is less of a burden on the credit union than the data collected through the quarterly 5300 Call Report since there is not a quarterly reporting requirement and the data infrequently changes. The proposed changes for December 2011 would be added to the profile area of NCUA's data collection.

**DESCRIPTION OF CHANGE:**

Background

NCUA's Office of Minority and Women Inclusion (OMWI) is responsible for assessing the diversity in the

credit unions regulated or insured by NCUA in accordance with Section 342(b)(2)(C) of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 342(b)(2)(C) states the OMWI Director shall develop standards for assessing the diversity policies and practices of entities regulated by the agency.

OMWI is also responsible for developing a program designed to preserve the minority ownership of minority depository institutions (or credit unions) in accordance with Section 367 of the Dodd Frank Act. Section 342 of the Dodd-Frank Act requires NCUA to submit an annual report to Congress containing a description of actions taken to carry out the above requirements. NCUA's first report is due in January 2012.

#### Proposed New Data Collection

NCUA is proposing to add four new questions to profile to help us assess the diversity practices of credit unions and identify credit unions that may qualify as a minority depository institution or credit union.

- **Regulatory Tab of Profile – Page 16 of Profile Form:** NCUA is adding two questions to the Regulatory section. The first question is to collect data to assess credit union compliance with the Equal Employment Opportunity Commission's Federal employment laws by asking the date the credit union last filed an EEO-1 Survey Form. We estimate that this question will only apply to approximately 600 or 8% of federally insured credit unions. The second question is asking credit unions if they have a diversity policy or program in their credit union. This is a yes/no question and once credit unions answer it in the profile, they only need to update their response if there is a change. NCUA is only to release this information in aggregate to the public.
- **Credit Union Programs and Member Services – Page 18 of Profile Form:** NCUA is adding two questions to the Programs/Services section to help identify credit unions who may qualify as a minority deposit institution. Specifically, these questions ask if more than 50% of the current and potential members fall into one of the defined minority groups. Section 308 of FIRREA defines "minority" as any "*Black American, Asian American, Hispanic American, or Native American*" and was used as the basis for these two questions. NCUA plans to release the results of these two questions to the public.

NCUA believes these four questions will not be a significant reporting burden on credit unions. These questions would be added to the profile section and once a credit union provides a response, they are only required to update this information if it changes. Additionally, for the 97% of credit unions who use the online data collection system, NCUA provides dropdown menus and checkboxes to alleviate confusion and simplify reporting.

Your review and attention to this matter is greatly appreciated.