



## NATIONAL CREDIT UNION ADMINISTRATION

TO: Shagufta Ahmed, Desk Officer  
Office of Management and Budget (“OMB”)

FROM: Tawana James, Director  
Office of Minority and Women Inclusion (“OMWI”)

SUBJ: Request for Emergency Clearance for NCUA Vendor Form

DATE: September 20, 2012

The purpose of this memorandum is to request an emergency clearance approval from the Office of Management and Budget (“OMB”) for a vendor registration form (“VRF”), in accordance with the Paperwork Reduction Act (“PRA”).

In order to meet the requirements of Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act” or the “Act”), the National Credit Union Administration (“NCUA” or the “Agency”) wishes to develop an automated online vendor registration form that allows vendors to register with NCUA for the purpose of participating in the Agency’s future contract solicitations. NCUA has learned that it must submit the VRF to OMB for approval under a clearance process, in accordance with the PRA. However, the timely implementation of the VRF is of mission critical importance to meet the requirements of Section 342 of the Dodd-Frank Act. As such, NCUA is requesting an emergency clearance approval of the VRF, as soon as practicable, to allow the Agency to obtain basic, yet important vendor information, since time is of the essence for the collection of this data and compliance with Dodd-Frank’s Congressional mandate.

### **Justification for Emergency Clearance**

The purpose of NCUA’s Vendor Registration Form (see Attachment A) is to allow vendors interested in doing business with the Agency to provide certain pertinent vendor information. This vendor information will allow NCUA to (1) learn about a vendor’s interest in NCUA’s contracting opportunities, (2) communicate with said vendors when opportunities arise, (3) gather vendor information to facilitate certain Congressionally-mandated reporting on the Agency’s contracting activities.

NCUA’s annual report to Congress on its contracting activities is the most significant reason behind the request for the emergency clearance of the VRF. Section 342 of the Act requires certain federal regulatory agencies to annually report the contract amounts paid to vendors that are minority-owned and women-owned. NCUA has designed the VRF as its sole mechanism to

be able to capture the type of information required for compliance with the Act. Since the Act is already in force and Congress has already required and received the first Report to Congress from the various regulatory agencies, obtaining emergency approval of this form will enable NCUA to immediately start capturing information from vendors on a consistent basis for the purpose of meeting the requirements of this Congressional mandate.

The VRF is a simple, one-page form that requires a few minutes for any vendor to complete. The VRF asks vendors for basic company information that is normally readily known and available to the vendor. In the Agency's estimation, completion of the VRF should take no more than 5 - 10 minutes. The only vendor information capture alternative to this short-form VRF would be to require vendors to register in the Central Contractor Registration ("CCR"), which is the federal register for all vendors wishing to do business with federal agencies governed by the Federal Acquisition Regulation ("FAR"). Registering in CCR is a lengthy and complex process that would place an undue burden on vendors wishing to do business with NCUA. Instead, the Agency's VRF significantly reduces that burden and allows vendors to connect with NCUA using a format that is both quick and simple. Additionally, the VRF contains questions that the federal government already requires vendors to provide during a CCR registration process.

In summary, the VRF provides vendors with an efficient, quick and simple vehicle to communicate their business interests to NCUA. The form also significantly reduces a vendor's burden by avoiding a lengthy and unnecessary registration process in CCR and, instead, allows vendors to provide limited, voluntary, readily available vendor information in a quick and simple manner. Most importantly, the VRF is the most efficient mechanism for NCUA to capture vendor information that is essential to responding to Congress in meeting the reporting requirements of Section 342 of the Dodd-Frank Act. The approval of this emergency clearance request will expedite the significant benefits that the VRF will bring to both the Agency and the minority-owned and woman-owned business community that it serves.

You may contact me at 703-518-1650 or via email at [tjames@ncua.gov](mailto:tjames@ncua.gov). if you have any questions regarding this request.