

Supporting Statement for Paperwork Reduction Act Submission
Written Reimbursement Policy
OMB Control Number 3133-0130
July 2013

A. Justification

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

The information collection is authorized under Section 120 of the Federal Credit Union ("FCU") Act, 12 U.S.C. § 1766(a) and section 701.33(b)(2)(1) of NCUA Regulations, 12 C.F.R. §701.33(b)(2)(1). The information collection is necessary to obtain adequate decisions in regard to reimbursement programs and to require internal controls for FCU boards of directors regarding reimbursement requirements.

2. Indicate how, and by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Each FCU must draft a written reimbursement policy to ensure that the FCU makes payments to its director within the guidelines that the FCU has established in advance and to enable examiners to easily verify compliance by comparing the policy to the actual reimbursements.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Not applicable.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information collection is unique to the FCU and is not duplicated anywhere.

5. If the collection of information impacts small business or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Not applicable.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less frequent collection would substantially impair the effectiveness of the program by allowing potential abuse by an FCU's director.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR § 1320.5(d) (2).

There are no special circumstances.

8. Describe efforts to consult with persons outside the agency.

Notice of the proposed information collection and request for public comment was published with a 60-day comment period in the Federal Register on August 12, 2013 (78 FR 48911). NCUA did not receive any comments regarding the collection.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no decision to provide any payment or gift to respondents.

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

There is no assurance of confidentiality.

11. Provide any additional justification for a question of a sensitive nature.

There are no questions of a sensitive nature.

12. Burden Estimates

NCUA estimates that five credit unions will apply for new FCU charters each year. NCUA estimates that it will take each new FCU two hours to draft its written reimbursement policy. NCUA estimates that the other FCUs will incur an average of one-half hour each annually to update their policies. NCUA's estimates are based on the experiences of NCUA's Office of Examination and Insurance.

New FCU Charters - 5 respondents X 2 hours = 10 burden hours
Existing FCUs Annual Update - 4,272 respondents X 0.5 hours = 2136 burden hours
10 burden hours + 2136 burden hours = 2146 total annual hours

13. Provide an estimate of the total annual cost burden to respondent or record keepers resulting from the collection of information.

The respondents and record keepers incur a nominal cost. Volunteer officials (all board officials save one are uncompensated volunteers by statute) prepare the written reimbursement policy so the cost to the FCU is nil. NCUA examiners review the FCU's policy as part of their annual examination of each FCU. Furthermore, the requirement for the policy should prevent monetary losses to FCUs and the NCUSIF.

14. Provide estimates of annualized cost to the Federal government.

There is no cost to the Federal government.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

A decline in the number of federal credit union, both existing and start-ups, is the reason for the reduction in reporting and recordkeeping burden.

16. For collections of information whose results will be published, outline plans for tabulation, and any publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no plans for publication of results.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

NCUA is not seeking approval to not display the expiration date for OMB approval.