

Supporting Statement for Paperwork Reduction Act Submission
National Credit Union Administration Authorization Agreement for Electronic Funds Transfers
Payments
(Automated Clearinghouse Program Data Form)
OMB No. 3133-0135
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 National Credit Union Administration is required under the Debt Collection Improvement Act of 1996 to issue payments to credit unions and all other entities electronically effective January 2, 1999. NCUA needs this collection of information to maintain up-to-date and accurate electronic payment data for new and existing credit unions. It is essential that electronic data is accurate and up-to-date for all credit unions.

2. Indicate how, 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.

NCUA will use the provided information to update its vendor (credit union) electronic routing and transit data database to enable transmittal of funds and payments. If this information is not collected, NCUA will not be able to make payment electronically through the Automated Clearing House (ACH) and will be in non-compliance with the Debt Collection Improvement Act of 1996.

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.

The *National Credit Union Administration Authorization Agreement for Electronic Funds Transfer Payments* is currently available on NCUA website for download. This form can be sent back to NCUA via fax for data input into our vendor database. The NCUA has determined that its current technology would not further reduce the burden of this form.

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 of electronic routing and transit data from credit unions is unique to each credit union. This information must be collected directly from each credit union to ensure accuracy of electronic payment data when payments to a specific credit union are required.

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.

The collection of this information does not have any additional impact on small business or other small entities.

6. Describe the consequence 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.

Current collection of information for this data are limited to newly-chartered credit unions that come into our system and current credit unions that have changed their electronic payment information. We estimate this to be no more than 250 credit unions on an annual basis. An existing credit union that has not changed its electronic payment information will not be required to renew this information annually.

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

This collection of information is conducted in a manner consistent with guidelines in 5 CFR 1320.5(d)(2).

8. 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.

This data is required is required under the Debt Collection Improvement Act of 1996. NCUA's collection of information requests only the essential electronic payment information required to make vendor (credit union) payments, when required. Notice of the proposed collection and request for public comment was published in the Federal Register with a 60-day comment period on August 12, 2013 (78 FR 48913). No comments were received.

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

NCUA does not provide any type of payments or gifts to respondents for the collection of information.

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

Confidentiality is governed by Treasury, the Federal Reserve System, and by NACHA through regulation.

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

NCUA has not included any questions on this collection of information that is intended as a requirement to disclose any information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

NCUA Authorization Agreement for Electronic Funds Transfers (Form)

The cost to the respondent is low since the information is readily known and available. We have received the information from all credit unions that can use ACH. This collection of information is only required from newly-chartered credit unions or existing credit unions that have changed their depository information. Based on the current credit union population and the time it would take to read, understand, and complete the form requesting the information, the estimated hour burden follows:

- The estimated annual number of respondents is 500.
- The estimated annual number of responses is 500.
- The estimated completion time per respondent is 15 minutes.
- The estimated annual burden hours are 125.

- The estimated one-time cost per respondent is \$8.42, based on the following: One full-time credit union employee - 15/60 hr @ \$33.67 average rate per hour = \$8.42 per credit union.
- The estimated annual cost is \$4,210 (\$8.42 per credit union x 500 respondents).

The above numbers (in the chart) reflect the anticipated newly chartered and/or credit unions who will have a change in electronic payment information over the next few years.

NCUA External Training – Stipend Reimbursement Request (Form)

This form is used to collect information in order to reimburse credit unions who have attended NCUA training workshops for incurred travel expenses. On average, ten credit unions per workshop request this reimbursement. NCUA has 20 workshops planned for 2014. 20 x 10 credit unions = 200 responses (maximum).

- The estimated average number of credit unions per workshop = 10 credit unions.
- 20 workshops x 10 respondents (credit unions) per workshop = 200 responses annually.
- The estimated total annual number of responses is 200.
- The estimated completion time per respondent is 10 minutes.
- The estimated annual burden hours are 33.33 hours.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (Do not include the cost of any hour burden shown in items 12 and 14).

There is no additional cost to respondents resulting from this one-time collection of information unless the respondent has changes to its depository information.

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

The estimated costs to the Federal Government are minimal. The form is available on the NCUA website and can be printed and faxed to our office.

15. Explain the reasons for any program changes or adjustments.

There are no program changes. This collection of information is a reinstatement of a previously approved collection without change.

16. For collections of information whose results will be published, outline plans for tabulation, and publication.

This collection of information is not eligible for publication. Information collected for this purpose is strictly for the electronic funds transfer payments to credit unions required by the Debt Collection Improvement Act of 1996. Therefore, this collection of information on the ACH form is confidential; therefore, the information will not be published.

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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

NCUA does not request an exception to the certification for this collection of information.