

National Credit Union Administration
Supporting Statement

Consumer Assistance Center
OMB Control No: 3133-NEW

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

Section 1034 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111-203) authorizes the National Credit Union Administration (NCUA) to accept and resolve member complaints. In addition, various federal consumer financial protection laws give the NCUA enforcement authority for federal credit unions. Specifically, 12 USC §5516(d)(1) provide prudential regulators, like the NCUA, with exclusive authority to enforce federal consumer financial protection laws. The NCUA is the prudential regulator for federally insured credit unions.

NCUA has centralized the intake of consumer inquiries and complaints under the Consumer Assistance Center, via the MyCreditUnion.gov website. The Consumer Assistance Center assists consumers with information about federal financial consumer protection and share insurance matters, and assists in resolving disputes with credit unions.

2. Purpose and Use of the Information Collection.

Consumers can submit inquiries or complaints electronically through the agency's MyCreditUnion.gov website that offers a consumer complaint online portal platform, fillable PDF versions are also available to consumers via the website, and complaints may be submitted via regular mail as well.

- **Consumer Inquiry Form:** This form is used to submit an inquiry to NCUA about various federal consumer financial protection topics and credit union operations.
- **Consumer Assistance Form:** This form is used to submit a formal complaint against a federally insured credit union. The purpose of the form is to collect information necessary for NCUA to investigate and take further action on a complaint submitted by a consumer regarding the actions of an institution overseen by NCUA.
- **Appraisal Complaint Form (NCUA Form 15003):** This form is used to submit a formal complaint when an entity regulated by the NCUA has failed to comply with the appraisal independence standards or Uniform Standards of Professional Appraisal Practice (USPAP). The purpose of the form is to collect information necessary for NCUA to investigate and take further action on a complaint

submitted by a consumer regarding the actions of an institution overseen by NCUA as it pertains to property appraisals and the appraisal process, including the actions of the appraiser. The NCUA will use the information to take further action on the complaint to the extent it relates to an issue within its jurisdiction.

The information will be used to improve the way the NCUA communicates with consumers requesting assistance in resolving inquiries or complaints concerning federally insured credit unions. The NCUA will use information collected from the forms to determine the nature of the inquiry or complaint, and which federal credit union, if any, is involved. Collecting the information will also allow the Consumer Assistance Center to review the information submitted in order to determine the relevant response for the requestor.

3. Use of Information Technology.

MyCreditUnion.gov provides interactive, online forms available to the general public to submit an inquiry or complaint. While the forms are available in both paper and electronic formats, the NCUA urges the public to utilize electronic methods of submission through the consumer complaint portal.

4. Duplication of Information.

The NCUA does not seek to duplicate any other complaint system maintained by other Federal or State agencies. The Office of Consumer Financial Protection (OCFP) is the primary office that interfaces with consumers, and only its Division of Consumer Affairs is tasked with requesting such information from the public involving federal credit unions. Information collected on the complaint form is solely used by OCFP and no other request of this nature currently exists within the agency.

5. Efforts to Reduce Burden on Small Entities.

The information collection does not have a significant impact on a substantial number of small businesses or other small entities.

6. Consequences of Not Conducting Collection.

The information collection is voluntary; however, not conducting a collection of information would substantially impair the effectiveness of the Consumer Assistance Center.

7. Inconsistencies with Guidelines in 5 CFR 1320.5(d)(2)

There are no special circumstances. This collection is consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultations with Persons Outside the Agency

A 60-day notice was published in the *Federal Register* on October 31, 2017, at 82 FR 50446, soliciting comments from the public and no comments were received.

9. Payment or Gifts to Respondents

There is no intent by the NCUA to provide payment or gifts for information collected.

10. Assurance of Confidentiality

There is no assurance of confidentiality other than those provided under the Privacy Act.

11. Questions of a Sensitive Questions Nature

A privacy impact assessment (PIA) has been conducted for information collected under this request as part of the “Consumer Complaints Against Federal Credit Unions” system and a Privacy Act System of Records notice (SORN) has been published in the Federal Register at 75 FR 41547.

12. Burden of Information Collection

Form	No. of Respondents	No. Responses Per Respondent	No. Annual Responses	Hours per Response	Total Burden Hours
Consumer Complaint Form	12,000	1	12,000	0.167	2000
Inquiry Form	4,800	1	4,800	0.083	398
Appraisal Complaint Form	12	1	12	0.5	6
TOTAL	16,812	1	16,812		2,404

Estimated cost burden to respondents: 2,404 x \$25.03 = \$60,172.12

13. Capital Start-up or On-going Operation and Maintenance Costs

There are no capital start-up or maintenance costs that are not already associated with the usual and customary practices of the respondents.

14. Costs to Federal Government

The annual cost to the NCUA is minimal.

15. Changes in Burden

This is a new collection in use without an OMB number. With regard to the appraisal complaint form, the associated burden was previously carried under OMB No. 3133-0188. This form will now be incorporated into this new request.

16. Information Collection Planned for Statistical Purposes

The information collection is not used for statistical purposes.

17. Request Non-display the Expiration Date of the OMB Control Number

The NCUA request non-display of the OMB expiration date for design and IT project scheduling reasons.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.