National Credit Union Administration Revisions to Call Report (5300) and Profile (4501A) OMB No. 3133-0004 PART 1

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

PROPOSED CYCLE DATE: September 30, 2016

REPORT(S) IMPACTED: NCUA Call Report Form (**NCUA Form 5300**), NCUA Profile Form (**NCUA Form 4501A**)

OMB FORM #: 3133-0004 (Expires 6/30/2017)

CALL REPORT PAGE(S) IMPACTED:

• Schedule C – Credit Union Service Organization (CUSO) – Page 19.

PROFILE PAGE(S) IMPACTED:

- Remove Credit Union Service Organization (CUSO) Page 8, and
- Renumber Pages 9-20 to 8-19

SUPPORTING ATTACHMENTS: Draft September 2016 Call Report Form and Draft September 2016 Profile Form.

Call Report and Profile Form Changes

The proposed changes to the quarterly 5300 Call Report and 4501A Profile will assist the National Credit Union Administration (NCUA) in offsite monitoring and supervision of credit unions while minimizing the burden on federally insured credit unions. NCUA data collections reflect emerging and existing risks to the National Credit Union Share Insurance Fund (NCUSIF). The following summarizes the proposed changes.

Description of the Call Report Form Changes:

<u>Page 19</u> – Schedule C – Credit Union Service Organization (CUSO) – Remove Wholly Owned CUSO Section from Schedule C to eliminate duplication of data collection. These items will eliminate 160 data collection accounts.

Description of the Profile Form Changes:

<u>Page 8</u> – Delete the entire collection contents of Credit Union Service Organization (CUSO) on page 8 and renumber the remaining pages 9-20 to 8-19.

National Credit Union Administration SUPPORTING STATEMENT

NCUA Call Report (NCUA Form 5300) and Profile (NCUA Form 4501A) OMB No. 3133-0004 PART 2

1. Explain the circumstances that make the collection of information necessary.

Sections 106 and 202 of the Federal Credit Union Act require federally insured credit unions to make financial reports to the NCUA.

Section 741.6 of the NCUA Rules and Regulations requires all federally insured credit unions to submit a Call Report (NCUA Form 5300) quarterly. Section 741.6 also requires insured credit unions to submit a Credit Union Profile (NCUA Form 4501A) and update the Profile within 10 days of election or appointment of senior management or volunteer officials or 30 days of other changes in Profile information. NCUA's website further directs credit unions to review and certify their Profiles every Call Report cycle.

Financial and statistical information collected through the Call Report and Profile is essential to NCUA supervision of federal credit unions. This information also facilitates NCUA monitoring of other credit unions with share accounts insured by the National Credit Union Share Insurance Fund (NCUSIF).

2. Purpose and use of information.

The individual credit union is the sole source of comprehensive information about institution condition and operations. In January 2014, NCUA began requiring all federally insured credit unions to submit quarterly Call Reports and update Profiles using the agency's web-based data-collection system, Credit Union Online (CU Online).

The Profile contains non-financial information about individual credit unions that remains fairly constant. After initial data entry, the credit union need update its Profile only when information changes. Under §741.6(a)(1), updates are required within ten days of election or appointment of officials or thirty days of other changes. A credit union may update its Profile any time through CU Online.

The NCUA uses information collected from Call Reports and Profiles through Credit Union Online to supervise federal credit unions, preserve the integrity of the NCUSIF, and help enforce federal regulations. Call Report/ Profile data are used by the Federal Reserve System to conduct monetary policy and protect the payments system. Congress and various state legislatures also use these data to monitor, regulate, and supervise credit unions and other financial institutions. Finally, the U.S. Commerce Department uses these data in National Income Accounting (such as calculation of Gross Domestic Product).

Changes in the Profile and Call Report forms for the September 2016 cycle will improve NCUA's ability to assess condition and compliance of individual federally insured credit unions while reducing overall public reporting burden.

NCUA creates a Financial Performance Report (FPR) with Call Report and Profile data. FPRs are available for each reporting credit union as well as for the industry and various industry subsets. Specifically, NCUA creates and distributes FPRS for federal credit unions, federally insured state chartered credit unions, and non-federally insured credit unions whose State Supervisory Authorities (SSA) mandate submission of Call Report and Profile data to assist with state-level supervision and regulation activities. NCUA examiners and SSAs use FPRs in on-site examination and off-site surveillance. Finally, FPRs provide reporting credit unions with useful financial and managerial information that would not be available absent the Call Report and Profile.

3. Describe any considerations of the use of improved information technology.

All federally insured credit unions must use NCUA's web-based data collection system, CU Online, to submit Call Report and Credit Union Profile information.

4. Describe efforts to identify duplication.

This revision prevents collection of duplicate information. The new Credit Union Service Organization (CUSO) Registry, which began operation in early 2016 (OMB No. 3133-0149), collects CUSO information currently submitted on the Call Report and Profile.

Aside from the Call Report, Profile, and CUSO Registry, NCUA engages in no other comprehensive collection of credit-union data. No other federal agency systemically collect these data on the same scale as NCUA. At the state level, NCUA works closely on improvements in data-collection forms and methods with the National Association of State Credit Union Supervisors (NASCUS), which represents SSAs. Cooperation with NASCUS representatives and individual SSAs (as necessary) enhances the Call Report and Profile as tools for collecting data used in the supervision and regulation process at the federal and state levels. NCUA collects all Call Report and Profile data and uses them to produce FPRs. Credit-union data and FPRs are available to SSAs in a convenient electronic format.

5. Reducing burden on small entities.

All credit unions must submit Call Report and Profile information as prescribed by regulations. NCUA minimizes the burden on small credit unions with CU Online, which performs calculations needed to derive various balance-sheet and income-state items, generate risk/performance metrics, and compare risk/performance with peer institutions.

6. Describe the consequence to the federal program or policy activities if the collection were conducted less frequently.

Credit union risk and profitability can change rapidly. Moreover, early warning about incipient safety-and-soundness issues at individual credit unions increases the likelihood of successful supervisory intervention (thereby reducing the likelihood of losses to members and the NCUSIF). Finally, to reduce regulatory burden, NCUA is exploring reduction in the frequency of on-site examinations for certain credit unions – a move which would require greater reliance on off-site surveillance. Quarterly Call Report data (and current Profile information) are necessary to monitor current conditions of supervised institutions and intervene effectively (through supervisory directives or targeted exams).

The consequences of non-collection are severe. A material reduction in the scope of Call Report/Profile data or frequency of data collection would significantly impair SSA and NCUA supervision of federally insured credit unions. The resulting deterioration in FPR information content would also seriously complicate credit-union efforts to manage risk and profitability.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines of 5 CFR 1320.5(d)(2).

NCUA conducts the collection entirely within the guidelines outlined in 5 CFR 1320.5(d)(2).

8. Consultations with persons outside the Agency.

NCUA has an ongoing commitment to communicate and interact with SSAs, NASCUS, and various credit-union trade associations. Typically, NCUA receives comments and suggestions from SSAs and trade associations throughout the year. NCUA considers all comments when weighing changes in data-collection methods (such as revisions in the Call Report/Profile forms).

A 60-day notice was published June 17, 2016 at 81FR39719 in the *Federal Register* soliciting comments from the public. One comment was received supporting the proposed collection changes.

9. Payment of gifts.

NCUA will not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality.

Call Report data, for most parts, are public information subject to release under the Freedom of Information Act. NCUA provides this information to the general public on

<u>NCUA's website</u>. However, some Call Report and Profile data as well as other information obtained through the supervisory process are confidential and, therefore, exempt from release under the Freedom of Information Act.

11. Questions of a sensitive nature.

Data collection fields are critical for adequate off-site monitoring and on-site examination of federally insured credit unions. The Profile asks for critical non-financial data such as contact information for credit union officials and mandatory-role individuals.

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

NCUA estimates six hours are required, on average, to complete the forms per quarter. To obtain a cost estimate for the proposed changes, the six-hour average was applied to the number of federally insured credit unions as of December 31, 2015 (6,021). The average cost per hour equaled the average annual salary and benefits per full-time equivalent employee as of December 31, 2015, divided by hours worked per year (52 weeks x 5 work days per week x 8 hours per day), and rounded to the nearest dollar. Average annual salary and benefits per full-time employee appears on tab 2 ("Ratios") of the Financial Performance Report (FPR) for all Federally Insured Credit Unions. The FPR based on Call Report data (i.e., the forms mentioned that credit unions fill out quarterly) and is a public document.

	# Respondents	# Responses Per Respondent	Annual Responses	Hours Per Response	Total Annual Burden	Cost to Respondent per Hour	Cost to Respondents
PRA	(1)	(2)	$(3) = (1) \times (2)$	(4)	$(5) = (3) \times (4)$	(6)	$(7) = (5) \times (6)$
Previous (2014)*	6,550	4	26,200	6.6	172,920	\$31	\$5,360,520
Current (2016)**	6,021	4	24,084	6.0	144,504	\$33	\$4,768,632
Difference =					-28,416		-\$591,888

^{*}Based on December 2013 FPR; **Based on December 2015 FPR.

The information source for most questions on the forms is the monthly financial statements and reports prepared by all credit unions in their normal course of business. Furthermore, NCUA provides advance notification of form revisions or reporting changes to enable credit unions to modify their record-keeping systems (if needed).

13. Capital start-up costs and operations and maintenance costs.

There are no capital start-up, operation, or maintenance costs associated with this information collection.

14. Annualized cost to the Federal Government.

Staff

Central Office:

Analyst staff - 2 full-time persons \$250,000 Technical data processing support staff \$1,001,880

Regional Offices:

Regional office staff – 320 hours @ \$55/hr. \$17,600 Examiner field staff – 33,408 hours @ \$38/hr. \$1,269,504

TOTAL ANNUAL FEDERAL GOVERNMENT COST: \$2,538,984

This estimate includes all costs associated with collection, processing, and distribution of information. However, these costs are partially offset by NCUA's Risk-Focused Examination program. NCUA monitoring of financial trends at the individual creditunions and industry levels also reduce expected losses to the NCUSIF.

15. Explain reasons for changes in burden.

Two factors account for the decline in burden hours (28,416) from the last submission (2014):

- A decline in the estimated number of credit unions that will complete the Call Report and Profile each year from 6,550 to 6,021. The smaller number of credit unions implies a smaller number of responses. This decline in credit unions reflects mergers and liquidations, which have reduced institution count by roughly one percent per quarter in recent years.
- Removal of the CUSO identification section of Schedule C, "Wholly Owned CUSO," from the Form 5300 (Call Report) and reporting of CUSO usage from the Form 4501A (Profile). This information is now reported separately in the CUSO Registry (OMB No. 3133-0149). Removal trims estimated hours to complete the Call Report and Profile from 6.6 hours to 6.0 hours.

16. Collections of information planned to be published for statistical use.

The projected information collection timetable for 2016 is posted on the <u>Credit Union Online</u> webpage (see cycle due dates).

17. Display of OMB expiration date.

The display of an expiration date may cause confusion among respondents when providing information by a prescribed date because minor technical changes to an electronic systems would impose additional time and resources if no other information was to change. Non-display of the expiration date of the OMB approval is requested.

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 does not involve statistical methods.