

National Credit Union Administration
SUPPORTING STATEMENT

Vendor Registration Form, NCUA 1772
OMB No. 3133-0185

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) calls for NCUA to promote the inclusion of minority-owned and women-owned firms in the agency’s business activities. An excerpt of Public Law 111-203 (July 21, 2010) explains the definition for minority-owned and women-owned businesses as (see numbers 4 and 6):

(g) DEFINITIONS.—For purposes of this section, the following definitions shall apply:

(1) AGENCY.—The term “agency” means—

- (A) the Departmental Offices of the Department of the Treasury;
- (B) the Corporation;
- (C) the Federal Housing Finance Agency;
- (D) each of the Federal reserve banks;
- (E) the Board;
- (F) the National Credit Union Administration;
- (G) the Office of the Comptroller of the Currency;
- (H) the Commission; and
- (I) the Bureau.

(2) AGENCY ADMINISTRATOR.—The term “agency administrator” means the head of an agency.

(3) MINORITY.—The term “minority” has the same meaning as in section 1204(c) of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (12 U.S.C. 1811 note).

(4) MINORITY-OWNED BUSINESS.—The term “minority-owned business” has the same meaning as in section 21A(r)(4)(A) of the Federal Home Loan Bank Act (12 U.S.C. 1441a(r)(4)(A)), as in effect on the day before the transfer date.

(5) OFFICE.—The term “Office” means the Office of Minority and Women Inclusion established by an agency under sub-section (a).

(6) WOMEN-OWNED BUSINESS.—The term “women-owned business” has the meaning given the term “women’s business” in section 21A(r)(4)(B) of the Federal Home Loan Bank Act (12 U.S.C.1441a(r)(4)(B)), as in effect on the day before the transfer date.

The Dodd-Frank Act also requires NCUA to annually report to Congress the total amounts paid to minority- and women-owned businesses. In order to comply with this Congressional mandate, NCUA needs to collect certain information from its current and potential vendors, so that it can identify businesses that meet the criteria that must be reported to Congress. The section within the Dodd-Frank Act that makes it necessary to collect this information is as follows:

Section 342(e)(2) Reports – Each Office shall submit to Congress an annual report regarding the actions taken by the agency and the Office pursuant to this section, which shall include – the percentage of the amounts described in paragraph (1) that were paid to contractors described in subsection(c)(1) [minority-owned and women-owned businesses].

2. Purpose and use of the information collection.

The vendor information is to be submitted to the NCUA on a one-time basis through a one-page vendor form, NCUA 1772. The information provided is voluntary and will be used to assign an ownership status to the vendor (i.e., minority-owned business, woman-owned business) per the requirements of the Act. Once an ownership status is assigned to each vendor, NCUA will be able to calculate the total amounts of contracting dollars paid to minority-owned and women-owned businesses.

3. Use of information technology.

This form is available on NCUA's public website (<http://forms.ncua.gov/Pages/VendorRegForm.aspx>) to facilitate its access to the vendor community. The electronic form is fillable online to ease the completion of the form, and includes a "Submit" button that the vendor can select to allow the form to be sent to NCUA electronically. The use of this electronic format significantly reduces the burden to vendors by avoiding having to print, manually complete, and then fax or email the form.

4. Duplication of information.

The only other possible source for this information is the System for Awards Management ("SAM") (www.sam.gov). SAM is the federal government's registry for federal vendors. Registration in SAM is required of all vendors seeking and performing contracts with federal agencies subject to the Federal Acquisition Regulation ("FAR"). SAM captures information related to a firm's ownership type (e.g., whether minority-owned or woman-owned). NCUA is not a FAR agency, so its vendors are not required to register in SAM. As such, NCUA cannot reliably count on or use the SAM as a means of obtaining the information that Congress requires. Additionally, registration in SAM tends to be a time-consuming and complex process. NCUA's vendor registration form alleviates the burden on its vendors by allowing them to provide significantly less information in a brief and simple format.

5. Efforts to reduce burden on small entities.

The information requested by this collection is required to be supplied only once by each vendor. The one-page form is brief and asks for simple, readily available information. This is a minimal burden. Additionally, NCUA has made this registration available electronically in a format that allows vendors to complete and submit online.

6. Consequences of not conducting the collection.

Without the implementation and use of the vendor registration form, NCUA would not be able to capture the type of information that Congress is requiring under the Dodd-Frank Act. NCUA needs to be able to know the ownership classification of each of its vendors to be able to comply with Dodd-Frank. The collection is only necessary once from each vendor.

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. Efforts to consult with persons outside the agency.

A 60-day notice was published in the *Federal Register* on March 22, 2019, at 84 FR 10841, soliciting comments from the public. No public comments were received on this information collection.

9. Payment or gifts to respondents.

The NCUA does not provide any payment or gifts to respondents.

10. Assurance of confidentiality.

There is no assurance of confidentiality other than that provided by law.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature. No personally identifiable information (PII) is collected.

12. Burden of information collection.

Based on NCUA's recent experience, the agency projects that approximately 200 vendors will annually submit this voluntary vendor registration form. The time estimated to complete the form is approximately 10 minutes. Since the information that is requested is general and readily available to the vendor/respondent, the hour burden should be the same and consistent across the vast majority of the vendors.

# Respondents	# Responses Per Respondent	Annual Responses	Hours Per Response	Total Annual Burden
200	1	200	0.10	33

Based on the labor rate of \$35 per hour, the total cost to respondents is \$1,155.

13. Capital start-up or on-going operation and maintenance costs.

There are no capital/start-up or ongoing operations/maintenance costs associated with this information collection.

14. Annualized costs to Federal government.

The vendor information is automatically captured in a database managed by NCUA. This vendor database is used to identify the types of vendors (i.e., minority-owned and women-owned) performing contracts for NCUA.

It is estimated that a CU-9 analyst spends an hour a month managing the database, for an annual estimated costs of \$360 [based on CU-9's hourly wage rate of \$30].

15. Changes in burden.

This is an extension of the currently approved collection. There was a reduction of 800 respondents based on the actual number of forms received; for a reduction of 134 burden hours.

16. Information collection planned for statistical purposes.

There are no plans for publication of individual vendor results. NCUA is required to provide a report to Congress regarding the total amounts paid to firms that have been identified as minority-owned and women-owned. This report to Congress is made public; however, the individual vendor information provided by NCUA vendors is not published.

17. Request non-display the expiration date of the OMB control number.

The display of the OMB expiration date may cause confusion on the date the information is needed by the agency. Non-display is requested. The OMB control number and expiration date associated with this PRA submission will be displayed on the Federal Government's electronic PRA docket at www.reginfo.gov.

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.