

National Credit Union Administration
SUPPORTING STATEMENT

Management Official Interlocks, 12 CFR Part 711
OMB No. 3133-0152

A. Justification

1. Circumstances that make the collection of information necessary.

NCUA requires this information collection to ensure federally insured credit unions comply with NCUA's Management Official Interlocks regulation at 12 CFR part 711, implementing the Depository Institution Management Interlocks Act ("Interlocks Act") (12 U.S.C. 3201-3208).

The Interlocks Act generally prohibits financial institution management officials from serving simultaneously with two unaffiliated depository institutions or their holding companies. For credit unions, the Interlocks Act restricts interlocks only between credit unions and other types of financial institutions, such as banks and their holding companies. 12 U.S.C. 3204(3).

The information collections associated with part 711 are as follows:

- under §711.4(h)(1)(i), a credit union must notify NCUA to obtain approval to have a director in common with a diversified savings and loan holding company at least 60 days before the dual service is proposed to begin;
- under §711.5, a credit union must maintain records to comply with the small market share exemption and must confirm that determination on an annual basis, and
- under §711.6(a), a credit union seeking a general exemption to a management official interlocks prohibition in §711.3 would have to compile information and apply to NCUA for approval.

2. Purpose and Use of the Information Collection.

Federally insured credit unions will use any information they compile and maintain, to comply with this regulation to evaluate their market share and that of any other financial institutions with which they want to share a management official. Credit unions may also use information they compile and maintain to analyze their asset level or to support requests to NCUA for approval or applications to NCUA for a general exemption.

3. Use of information technology.

The low number of FICUs affected by this information collection does not support electronic enabling; though FICUs may provide documentation to NCUA electronically via email.

4. Duplication of information.

There is no duplication. Collection of this information is required only under the Management Official Interlocks rule.

5. Efforts to reduce burden on small entities.

There is a small market share exemption under which qualified depository organizations that fall under the parameters of §711.5(a) need not submit information that would otherwise be required.

6. Consequences of not conducting the collection.

This information provided by FICUs is required by statute.

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

There are no special circumstances.

8. Efforts to consult with persons outside the agency.

A 60-day notice was published in the Federal Register on February 20, 2020, at 85 FR 9810, soliciting comments from the public. NCUA did not receive any comments regarding the collection.

9. Payment or gifts to respondents.

There are no payments or gifts to the respondents.

10. Assurances of confidentiality.

There are no assurances of confidentiality.

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.

NCUA estimates that approximately 2 credit unions per year apply for approval or engage in the activity, and that it will take an average of 3 hours to provide NCUA with the information and maintain records required by this part. Thus, the total annual collection burden estimated is six hours.

No. Respondents	No. Responses Per Respondent	Annual Responses	Hours Per Response	Annual Burden
2	1	2	3	6

Labor cost is based on \$35 annual wage rate: \$210.00.

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

There are no capital start-up or operation and maintenance costs incurred.

14. Annualized costs to Federal government.

There are no costs to the government.

15. Changes in burden.

This is extension without change of a previously approved collection.

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 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. Collection of Information Employing Statistical Methods.

This collection does not employ statistical methods.