## Justification for Non-substantive/Not Major change

Credit Union Service Organizations (CUSOs), 12 CFR Part 712 OMB No. 3133-0149

The non-substantive change to the CUSO registry would provide for two follow-up questions should a CUSO selects "yes" in having an investment in their organization. Follow-up questions only appears with a "yes" response.

The reply to the follow-up questions will either be a "yes" or "no" response. These follow-up questions are set-out below and are shown in the green outlined box as it would appear in the registry:

- a. Own more than 25% of the CUSO's contributed equity or stock?
- b. Have direct or indirect control of the CUSO?



This change is being made to identify the minimal investment in a CUSO without being classified as a corporate CUSO as a result of updates to 12 CFR part 704 to update, clarify and simplify provisions of corporate credit unions.

The proposed changes will not impact the current estimated burden of 30 minutes to complete the registry (per respondent). The time necessary to provide a "yes" or "no" response to the follow-up questions do not apply to all respondents but is within the allotted 30 minutes to complete.

The NCUA believes that this constitutes a non-substantive change that can be approved by OMB under the PRA without undertaking a full PRA clearance and requests OMB approval of the revision as a non-substantive change.