

National Credit Union Administration
SUPPORTING STATEMENT

Consumer Assistance Center
OMB Control No: 3133-0200

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) provides 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 a centralized website for 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. The 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 uses the information to take action on a complaint to the extent it relates to an issue within its jurisdiction.

The information is further used to improve the way the NCUA communicates with consumers requesting assistance in resolving inquiries or complaints concerning federally insured credit unions. The NCUA uses 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 also allows 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 with ease. 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 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 the 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. Efforts to consult with persons outside the agency.

A 60-day notice was published in the *Federal Register* on June 9, 2021, at 86 FR 30629, 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 what is provided by law.

11. Questions of a sensitive nature.

Information may be disclosed to officials of federal credit unions and other persons mentioned in a complaint or identified during an investigation. 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, NCUA-12, and a Privacy Act System of Records Notice (SORN) has been published in the Federal Register at 83 FR 40572.

12. Burden of information collection.

| Information Collection Activity | Respondents | # Responses per Respondent | Total Annual Responses | Time per Response (Hours) | Total Annual Burden | Previously Approved | Difference |
|-------------------------------------|-------------|----------------------------|------------------------|---------------------------|---------------------|---------------------|------------|
| Consumer Inquiry Form | 3,400 | 1 | 3,400 | 0.083 | 282.20 | 398 | -115.80 |
| Consumer Complaint Form | 11,500 | 1 | 11,500 | 0.167 | 1,920.50 | 2,000 | -79.50 |
| Appraisal Complaint Form NCUA 15003 | 12 | 1 | 12 | 0.5 | 6.00 | 6 | 0.00 |
| | 14,912 | 1 | 14,912 | 0.1481156 | 2,208.70 | 2,404 | -195.30 |

Estimated cost burden to respondents: 2,208 x \$25.03 = \$55,266.24

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

There are no capital start-up or maintenance costs.

14. Annualized costs to Federal government.

The annual cost to the NCUA is minimal.

15. Changes in burden.

A reduction of 195 burden hours is due to an adjustment in the number of respondents submitting inquiries or complaints.

Burden associated with the Inquiry Form and Complaint Form were inverted on the previous ROCIS entry; the supporting statement was correct. This submission makes the correction to the error. The supporting statements remain correct. The total burden adjustment remains the same.

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 site 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 of information does not employ statistical methods.