

National Credit Union Administration
SUPPORTING STATEMENT

Written Reimbursement Policy, 12 CFR §701.33
OMB No. 3133-0130

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

Federal Credit Unions (“FCU”) may reimburse its board members for reasonable and proper costs incurred in conducting their official responsibilities only if the reimbursement is in accordance with the written reimbursement policies and procedures established by the FCU’s board of directors. Access to this plan, and documentation related to its implementation, is necessary for NCUA examiners to verify compliance with this requirement.

The information collection is authorized under Section 120 of the Federal Credit Union (“FCU”) Act, 12 U.S.C. § 1766(a) and section 701.33(b)(2)(1) of NCUA Regulations, 12 CFR §701.33(b)(2)(i).

2. Purpose and use of the information collected.

Each FCU must maintain and retain a written reimbursement policy to ensure that the FCU makes payments to its director within the guidelines that the FCU has established in advance and to enable examiners to easily verify compliance by comparing the policy to the actual reimbursements.

3. Use of information technology.

Plans and documentation may be retained in any form, including electronically.

4. Duplication of information.

The information collection is unique to the FCU and is not duplicated anywhere.

5. Efforts to reduce burden on small entities.

The requirement to have a written reimbursement plan represents the minimum information necessary to implement this provision. All FCUs have the same recordkeeping requirement.

6. Consequences of not conducting the collection.

Without this information collection, board members nor directors will be able to be reimbursed for reasonable and proper costs incurred while conducting their official responsibilities. Also, it would substantially impair the effectiveness of the program without the written reimbursement policy at FCUs.

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

This information collection is consistent with guidelines.

8. Efforts to consult with persons outside the agency.

A 60-day notice was published in the Federal Register on July 5, 2023 at 88 FR 42967, soliciting comments from the public. No public comments were received in response to that notice. The 30-day notice was published in the Federal Register on September 12, 2023 at 88 FR 62606.

9. Payment or gifts to respondents.

There are no payments or gifts made to respondents.

10. Assurance of confidentiality.

There are no assurances of confidentiality other than those provided by law.

11. Questions of a sensitive nature.

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

12. Burden of information collection.

NCUA estimates that FCUs will incur an average of one-half hour each annually to maintain their policies. As of September 2019, there are 3,321 FCU.

No. Respondents	No. Responses per Respondent	No. Annual Responses	Hours per Record	Total Burden Hours
2,931	1	2,931	0.50	1,465.50

Based on the labor rate of \$35 per hour, the total cost to respondents is \$51,292.50.

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

There are no capital start-up or maintenance costs.

14. Annualized cost to the Federal government.

There is no cost to the Federal government.

15. Changes in burden.

The regulatory burden has decreased due to the number of FCU's that have also decreased.

16. Information collection planned for statistical purposes.

The information will not be published.

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

There are no traditional collection instruments associated with this collection of information (e.g. forms). 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 the Certification for Paperwork Reduction Act Submission.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not involve statistical methods.