

## **Request for Approval under the “Generic Clearance for the Collection of Routine Customer Feedback” (OMB Control Number: 3133-0188)**

---

**TITLE OF INFORMATION COLLECTION:** CURE Minority Depository Institution Preservation Program Research

**PURPOSE:** The NCUA’s Office of Credit Union Resources and Expansion (CURE), which administers the agency’s Minority Depository Institution Preservation Program, supports the growth of all credit unions, with a particular focus on low-income-designated credit unions and minority institutions. Minority depository institutions (MDIs) serve the financial needs of racial minorities because traditional financial institutions have historically underserved these populations. Supporting and preserving MDIs is fundamental to the NCUA’s efforts to promote greater financial inclusion by expanding access to affordable, federally insured financial services.

CURE contracted a professional researcher to conduct in-depth analysis of MDIs insured by the NCUA. The research will analyze the work, challenges, and best practices of MDIs and provide the agency recommendations to better support existing MDI credit unions and to encourage the identification and establishment of new MDI credit unions. The agency will use the analysis and recommendations to ensure its MDI Preservation Program is responsive to the needs of MDIs.

The research will entail obtaining input from industry experts that will be compiled into a final assessment report presented to the NCUA. Input will be sought on:

- Systemic and practical barriers facing MDIs;
- Products and services that are (or should be) provided by MDIs to improve their financial performance; and
- Defining ways MDIs can collaborate amongst each other.

**DESCRIPTION OF RESPONDENTS:** Interviews with industry experts, including MDI officials, NCUA staff, and other non-NCUA stakeholders will be used to obtain input. The NCUA will send an email to interviewees introducing the contractor and inviting their input.

Following is an example of the email text that will be sent:

*The NCUA’s Office of Credit Union Resources and Expansion (CURE), which administers the agency’s Minority Depository Institution Preservation Program, supports the growth of all credit unions, with a particular focus on low-income-designated credit unions and minority institutions.*

*Financial Health Network has been contracted by the NCUA to conduct in-depth analysis of MDIs, in addition to seeking input from industry experts. Specifically, we seek your guidance in:*

- *Outlining systemic and practical barriers facing MDIs;*
- *Discussing products and services that are (or should be) provided by MDIs to improve their financial performance; and*
- *Defining ways MDIs can collaborate amongst each other.*

*Your input to this important work will be compiled alongside others' in a final assessment report presented to the NCUA later this year. Your participation is voluntary and will not impact other work your organization has before the NCUA.*

The results are qualitative and the results are not generalizable to the population of study.

**TYPE OF COLLECTION:** (Check one)

- |  |   |
|--|---|
| <input type="checkbox"/> Customer Comment Card/Complaint Form          | <input type="checkbox"/> Customer Satisfaction Survey                   |
| <input type="checkbox"/> Usability Testing (e.g., Website or Software) | <input type="checkbox"/> Small Discussion Group                         |
| <input type="checkbox"/> Focus Group                                   | <input checked="" type="checkbox"/> Other: <u>Individual interviews</u> |

**CERTIFICATION:**

I certify the following to be true:

1. The collection is voluntary.
2. The collection is low-burden for respondents and low-cost for the Federal Government.
3. The collection is non-controversial and does not raise issues of concern to other federal agencies.
4. The results are not intended to be disseminated to the public.
5. Information gathered will not be used for the purpose of substantially informing influential policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.

Name: Dawn Wolfgang  
NCUA PRA Clearance Officer

Date: 3/30/2022

Program Contact: Pamela Williams, CURE

To assist review, please provide answers to the following question:

**Personally Identifiable Information:**

1. Is personally identifiable information (PII) collected?  Yes  No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974?  Yes  No
3. If Yes, has an up-to-date System of Records Notice (SORN) been published?  Yes  No

**Gifts or Payments:**

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants?  Yes  No

**BURDEN HOURS**

Category of Respondent	No. of Respondents	Participation Time	Burden
External subject matter experts	10	45 mins. each	7.5 hours
Credit union leagues	5	45 mins. each	3.75 hours
MDI credit union leaders	10	45 mins. each	7.5 hours
<b>Totals</b>	<b>25</b>	<b>2.25 hours</b>	<b>18.75 hours</b>

**FEDERAL COST:** The estimated annual cost to the Federal government is \$87,500

**If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:**

**The selection of your targeted respondents**

Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?

Yes     No

If the answer is yes, please provide a description of both below (or attach the sampling plan)? If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

We have a list of the universe of MDI credit unions and credit union leagues. Subject matter experts have been identified within organizations deeply connected to credit unions and/or MDIs.

**Administration of the Instrument**

1. How will you collect the information? (Check all that apply)

- Web-based or other forms of Social Media
- Telephone
- In-person
- Mail
- Other, Video conference platform (Zoom)

2. Will interviewers or facilitators be used?  Yes  No

**Please make sure that all instruments, instructions, and scripts are submitted with the request.**