

National Credit Union Administration
SUPPORTING STATEMENT

NCUA Profile (NCUA Form 4501A)
OMB No. 3133-0204

**SUMMARY OF PROPOSED CHANGES TO NCUA PROFILE
DATA COLLECTION**

PROPOSED CYCLE DATE: December 31, 2024

REPORT(S) IMPACTED: NCUA Profile Form 4501A

OMB FORM #: 3133-0204 (Expires October 31, 2026)

PROFILE PAGE(S) IMPACTED:

- General Information – Page 3
- Contacts and Roles – Page 4
- Sites – Page 5
- Payment System Service Provider (PSSP) Information – Page 6
- Information Technology (IT) – Page 7
- Grants – Page 11
- Merger Partner Registry – Page 12

SUPPORTING ATTACHMENTS: Draft December 2024 Profile Form. Draft December 2024 Profile Instructions. Profile Changes December 2024.

Profile Changes

The NCUA proposes to add 13 new questions, to modify five existing questions, and to retire nine questions. Adding and modifying these questions are needed to support the NCUA's supervision of credit unions. The Profile changes are mainly in the Payment Systems Service Provider (PSSP) Information and Information Technology (IT) areas. The following summarizes the proposed changes.

Description of the proposed Profile Form Changes:

Page 3 – General Information:

- Adding the Anti-money Laundering Monitoring System name.
- Adding checkboxes for eligible minority groups in the credit union's field of membership.

Page 4 – Contacts and Roles:

- Modifying the Home Email and Work Email elements to identify the preferred email address to be used for credit union correspondence.

Page 5 – Sites

- Adding an indicator for exclusively online credit unions.
- Modifying the description for Public Site Functions to inform the user that these will be published in the Credit Union Locator if at least one function is selected.
- Adding Interactive Teller Machine (ITM) as an option in the Public Site Functions section.

Page 6 – Payment System Service Provider Information (PSSP):

- Modifying the systems used to process electronic payments section by replacing EPN with SWIFT and changing the location of this section.
- Adding a question to capture the Automated Clearing House (ACH) Operator used for domestic ACH processing.
- Adding a question to capture the credit union’s participation in instant payment processing.
- Adding a question to capture the agents and technology service providers used for instant payment processing.
- Expanding the payment system service(s) and PSSPs used question.
- Expanding the question related to changing PSSPs to determine if there are plans to add new payment system service(s) within the next 24 months.
- Expanding the new payment system service(s) and PSSPs question.
- Adding a question to determine if the credit union digitally issues or instant issues cards at any of their locations.
- Adding a question to determine if the credit union owns or leases any Automated Teller Machines (ATMs) or ITMs.
- Adding a question to determine if the credit union originates Same-day ACH Transactions.
- Modifying the Online Banking option to include the term “web-based” for the electronic payment initiation method question.
- Adding Mobile Banking application, Mail (postal service), and Lockbox as options for the electronic payment initiation method question.

Page 7 – Information Technology (IT):

- Adding a digital banking services section.
- Modifying the core applications section to include information on General Ledger and other types of applications.
- Modifying the core application conversions section to include information on General Ledger and other types of applications.
- Adding a Managed Security Service Provider section.

Page 11 – Grants:

- Deleting this entire page.

Page 12 – Merger Partner Registry:

- Adding an indicator for a Minority Depository Institution (MDI) credit union to express an interest in being considered a merger partner for an MDI.

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A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

Sections 106 and 202 of the Federal Credit Union Act require federally insured credit unions to make financial reports to the NCUA. Section 741.6 of the NCUA regulations requires insured credit unions to submit a Credit Union Profile (NCUA Form 4501A) and update the Profile within 10 days of election or appointment of senior management or volunteer officials or 30 days of other changes in Program information. The NCUA website further directs credit unions to review and certify their Profiles every Call Report (OMB No. 3133-0004) cycle.

Credit union information collected through the Profile is essential to the NCUA supervision of federal credit unions. This information also facilitates the NCUA monitoring of other credit unions with share accounts insured by the National Credit Union Share Insurance Fund (NCUSIF).

2. Purpose and use of information collected.

The NCUA uses the information collected through the Profile to supervise and regulate federally insured credit unions.

Changes made to the Profile form for December 2024 will help NCUA assess credit union programs without increasing the burden on reporting institutions.

3. Use of improved information technology.

To comply with Federal mandates, on April 1, 2023, the NCUA web-based data collection system (CUOnline) transitioned to NCUA Connect for user authentication and management. NCUA Connect is NCUA's secure authentication portal used to manage user accounts, assign application roles to users, perform other user administration functions, and provide multi-factor authentication. All federally insured credit unions access CUOnline through NCUA Connect to submit their Call Reports and update their Profiles.

Individual credit unions are the sole source of information about their financial condition and operations. The Profile captures information about the credit union that changes infrequently. After initial Profile data are entered, a credit union only needs to update data to reflect additions, deletions, and other changes. Credit unions must update Profile information within ten days of an election or appointment of an official or 30 days of any other change. Requiring input only when Profile information changes and allowing such changes to be made 24/7/365 through an online interface reduces the reporting burden.

4. Duplication of information.

This information collection is unique to each FICU and is not duplicated.

5. Efforts to reduce burden on small entities.

This collection does not have a significant impact on a substantial number of small credit unions updates can be performed electronically via CUOnline.

6. Consequences of not conducting the collection.

Collection items from the Profile provide critical information for the supervision of safety and soundness and monitoring of regulatory compliance. In particular, the NCUA uses collection items for off-site monitoring, which greatly reduces the burden of on-site examinations. The NCUA must react quickly to emerging risks to protect the share accounts of the nation's credit union members and the integrity of the NCUSIF.

The consequences of non-collection are severe. Absent Profile updates, State Supervisory Authorities (SSAs), and the NCUA would have to rely on more frequent on-site visits to monitor regulatory compliance.

7. Inconsistencies with guidelines of 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 of the agency.

A 60-day notice was published in the Federal Register on July 26, 2024, at 89 FR 60662, soliciting comments from the public. The NCUA received ten comment letters, four of which were irrelevant or did not apply to the actual information collection.

The NCUA solicited and received suggestions from the SSAs specifically for this extension and revision of an information collection. The NCUA has an ongoing commitment to communicate and interact with SSAs, National Association of State Credit Union Supervisors, and credit union trade associations. Typically, the NCUA receives comments and suggestions from SSAs and trade associations throughout the year. The NCUA considers these comments when revising the Call Report and Profile forms as well as other aspects of data collection.

9. Payment of gifts to respondents.

No payment or gifts are provided to respondents.

10. Assurance of confidentiality.

There is no assurance of confidentiality other than that provided by law.

11. Questions of a sensitive nature.

Data collection fields are critical for adequate off-site monitoring and on-site examination of federally insured credit unions. The Profile asks for critical non-financial data such as contact information for credit union officials and mandatory-role individuals. A System

of Records Notice is not required as the information is not stored based on the individual's name or other personally identifiable information.

12. Burden of the collection of information.

As of March 31, 2024, there were 4,572 federally insured credit unions. The NCUA estimates credit unions will, on average, need two hours to complete the form, via CUOnline. Section 741.6 requires the Profile to be updated within 10 days of election or appointment of senior management or volunteer officials or 30 days of other changes in program information and to be certified every quarter during the Call Report cycle.

No. Respondents	No. Responses Per Respondent	No. Annual Responses	Hours Per Response	Total Annual Burden Hours
4,572	4	18,288	2	36,576

Based on the labor rate of \$49 per hour, the total cost to respondents is \$1,792,224. The dollar-cost estimate uses an average hourly wage for credit union staff. This wage rate of \$49 is based on Call Report data. The NCUA provides advance notification of all changes in reporting, thereby allowing credit unions to modify automated and manual record-keeping systems before data collection begins.

13. Capital start-up costs and operations and maintenance costs.

There are no capital start-up, operation, or maintenance costs associated with this information collection.

14. Annualized cost to the Federal government.

Staff

Central Office:

Systems staff - 1 full-time person	\$137,500
Technical data processing support staff	\$334,000

Regional Offices:

Regional office staff – 96 hours @ \$57/hr.	\$5,472
Examiner field staff – 10,053 hours @ \$38/hr.	\$382,017
TOTAL ANNUAL FEDERAL GOVERNMENT COST:	\$858,989

The estimate of annual costs to the Federal Government includes all costs associated with the collection, processing, and distribution of information. It is important to note, however, that these costs are offset through the NCUA Risk-Focused Examination program.

15. Changes in burden.

The number of respondents decreased to 4,572 resulting in a slight decrease in total annual burden hours. Revisions include a net increase of 35 data elements. These revisions will not alter the estimated burden hours necessary to complete the profile. The

information needed to provide a “yes” or “no” response is readily available and the NCUA feels the two hours currently allotted to complete the Form 4501A is sufficient.

- 16. Collections of information planned to be published for statistical use.**
The projected Profile collection schedule for 2024 is provided below.

March 31 Collection

April 30	Forms Due
May 1 - May 7	Forms Processed
May 8 - June 1	Data Finalized and Distributed

June 30 Collection

July 30	Forms Due
July 31 - August 7	Forms Processed
August 8 - September 1	Data Finalized and Distributed

September 30 Collection

October 30	Forms Due
October 31 - November 7	Forms Processed
November 8 - December 1	Data Finalized and Distributed

December 31 Collection

January 30, 2025	Forms Due
January 31 - February 7, 2025	Forms Processed
February 8 - March 1, 2025	Data Finalized and Distributed

- 17. Request of non-display of the expiration date of the OMB control number.**
The display of an expiration date may confuse respondents when providing information by a prescribed date because minor technical changes to an electronic system would impose additional time and resources if no other information were to change. Non-display of the expiration date of the OMB approval is requested.

- 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 does not involve statistical methods.