# National Credit Union Administration **SUPPORTING STATEMENT**

NCUA Call Report OMB No. 3133-0004

## SUMMARY OF PROPOSED CHANGES TO NCUA CALL REPORT DATA COLLECTION

# PROPOSED CYCLE DATE: March 31, 2025

# REPORT(S) IMPACTED: NCUA Call Report Form 5300

**OMB FORM #:** 3133-0004 (Expires August 31, 2025)

# CALL REPORT PAGE(S) IMPACTED:

- Schedule A, Section 4 Page 9
- Schedule C, Section 4 Page 18
- Schedule D, Section 2 Page 19
- Schedule D, Section 3 Page 19

**SUPPORTING ATTACHMENTS:** Draft March 2025 Call Report Form. Draft March 2025 Call Report Instructions. Call Report Changes March 2025.

# Call Report Changes

The NCUA proposes to add 27 new accounts, modify 12 existing accounts, and retire five accounts. Adding and modifying these accounts are necessary to support the NCUA's supervision of credit unions. The Call Report changes are mainly on Schedule D, Shares, Supplemental Information. The following summarizes the proposed changes.

## **Description of the proposed Call Report Form Changes:**

<u>Page 9</u> – Schedule A, Section 4, Other Loan Information:

• Deleting two accounts for reporting the contractual balance outstanding and recorded investment reported as loans in Account 025B of purchased credit impaired loans.

Page 18 – Schedule C, Section 4:

- Deleting three accounts for reporting the FRB Paycheck Protection Program Lending Facility loans borrowing capacity, draws against borrowing capacity, and assets pledged to secure borrowing capacity.
- Adding one account for reporting assets pledged to secure deposits, other funding arrangements, and other counterparty requirements.

Page 19 – Schedule D, Section 2:

- Adding three accounts for reporting the number and amount of brokered member nonmaturity shares.
- Adding five accounts for reporting the number and amount by remaining maturity of brokered member term shares.
- Adding three accounts for reporting the number and amount of brokered nonmember non-maturity deposits.
- Adding five accounts for reporting the number and amount by remaining maturity of brokered nonmember term deposits.
- Adding five accounts for reporting the number and amount by remaining maturity of all other nonmember deposits.
- Adding one account for reporting the amount of nonmember credit union deposits.
- Adding one account for reporting the amount of reciprocal deposits.
- Modifying accounts held by nonmember public units to nonmember public unit deposits
- Modifying accounts held by member public units to member public unit deposits

Page 19 – Schedule D, Section 3:

• Adding three accounts for reporting the maturity distribution of total uninsured shares and deposits. Although these accounts are being added in March 2025, implementation will be delayed giving credit unions time to develop reporting systems.

# National Credit Union Administration **SUPPORTING STATEMENT**

#### NCUA Call Report (NCUA Form 5300) OMB No. 3133-0004

## 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 prescribes the method in which federally insured credit unions must submit this information to NCUA. NCUA Form 5300, Call Report, is used to file quarterly financial and statistical data through NCUA's online portal, CUOnline. The financial and statistical information is essential to NCUA in carrying out its responsibility for supervising federal credit unions. This information facilitates NCUA monitoring of 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 Call Report to supervise and regulate federally insured credit unions and safeguard the NCUSIF. The Federal Reserve also uses the information to conduct monetary policy, protect the payments system, and preserve competition among depository institutions. Congress and the state legislatures use the information to formulate policy on credit unions, other depository institutions, and the financial system. Finally, the U.S. Department of Commerce uses the information to produce national income accounting data and statistics.

Changes made to the Call Report form for March 2025 will help NCUA assess credit union financial conditions without materially increasing the burden on reporting institutions.

NCUA also uses Call Report data to create a Financial Performance Report (FPR) for each reporting credit union, the industry, and various industry cohorts. These reports are available to the public and distributed to all federal credit unions, federally insured statechartered credit unions, and those non-federally insured credit unions required to submit Call Report data by their State Supervisory Authority (SSA). NCUA examiners and SSAs also receive FPRs to assist in examination/supervision. Call Report changes ensure FPRs provide all recipients with accurate pictures of credit union risk and profitability – at the individual institution and aggregate levels.

## 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

(FICU) 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.

### 4. Duplication of information.

This collection of information 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 to the Call Report can be performed electronically via CUOnline.

#### 6. Consequences of not conducting the collection.

Collection items from the Call Report 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 quarterly Call Report submissions, SSAs, and the NCUA would have to rely on more frequent on-site visits to supervise credit union risks and monitor regulatory compliance. The NCUA's examination tool, MERIT, relies on data collected in the Call Report. Moreover, there would be no Financial Performance Report – thereby depriving federal and state authorities as well as the credit union industry of a valuable tool for policymaking and financial management.

## 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 September 16, 2024, at 89 FR 75590, soliciting comments from the public. The NCUA received 20 comment letters, two of which were irrelevant or did not apply to the actual information collection.

The commenters asked the NCUA to reconsider asking credit unions to report the number and amount of loans granted year-to-date to officials and senior executives, to improve the instructions related to reporting the maturity distribution of uninsured shares, and to delay implementation of reporting the maturity distribution of uninsured shares to allow time for developing reporting systems. The commenters also objected to the increase in burden, reporting negative shares as loans, and suggested adding a designator for credit unions to self-report as a CDFI. Based on these comments, the NCUA removed the accounts for reporting the number and amount of loans granted year-to-date to officials and senior executives. The NCUA will delay implementation of the maturity distribution of uninsured shares to allow credit unions time to develop reporting systems. The maturity distribution of uninsured shares will not be reported in March 2025. No additional changes were made due to comments received during the 60-day comment period.

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, NASCUS, 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.

Most Call Report data are public information subject to release under the Freedom of Information Act. NCUA provides this information to the general public on the agency website (<u>www.ncua.gov</u>). Some Call Report information as well as information obtained through the supervisory process are confidential and, therefore, exempt from release under the Freedom of Information Act.

## **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. A System of Records Notice (SORN) 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 September 30, 2024, there were 4,499 federally insured credit unions. NCUA estimates credit unions will, on average, need four hours to complete the form, via CUOnline. To obtain industrywide costs, this average is applied to all federally insured credit union, thereby yielding:

Credit Union Staff Time – Four hours per reporting institution per reporting cycle (four cycles per year):

No. Respondents	No. Responses Per	No. Annual	Hours Per	Total Annual Burden
	Respondent	Responses	Response	Hours
4,499	4	17,996	4	71,984

Based on the labor rate of \$49 per hour, the total cost to respondents is \$3,527, 216. 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.

<u>Staff</u> Central Office: Systems staff - 1 full-time person	\$189,946
Technical data processing support staff	\$330,823
Regional Offices:	
Regional office staff – 715 hours @ $82/hr$ .	\$58,630
Examiner field staff – 5,640 hours @ \$55/hr.	\$310,200
TOTAL ANNUAL FEDERAL GOVERNMENT COST:	\$889,599

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.

All Call Report changes made since March 2022 result in no net increase in Call Report accounts. These revisions will not alter the estimated burden hours necessary to complete the Call Report. The information needed to provide a response is readily available and NCUA feels that the four hours currently allotted to complete the Form 5300 is sufficient. Number of respondents decreased from 5,097 to 4,499 which resulted in a decrease of 9,568 total annual burden hours from 81,552 to 71,984.

16. Collections of information planned to be published for statistical use.

The projected Call Report collection schedule for 2025 is provided below.

March 31 Collection

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

June 30 Collection

July 30 July 31 - August 7 August 8 - September 1

Forms Due Forms Processed Data Finalized and Distributed

September 30 Collection

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

December 31 Collection

January 30, 2026 January 31 - February 7, 2026 February 8 - March 1, 2026 Forms Due Forms Processed 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.