August 11, 2025

Ms. Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

RE: Office of Management and Budget Request regarding Travel Management (RIN 3133–New)

Dear Ms. Conyers-Ausbrooks:

On behalf of America's Credit Unions, I am writing in response to the National Credit Union Administration's (NCUA) notice and request for comments (RFC) on an information collection to be submitted to the Office of Management and Budget (OMB) pertaining to the agency's Travel Management. America's Credit Unions is the voice of consumers' best option for financial services: credit unions. We advocate for policies that allow the industry to effectively meet the needs of their over 142 million members nationwide. As addressed below, we urge the agency to apply even greater scrutiny when making decisions related to staff travel. It is essential that the NCUA act as a prudent steward of credit unions' funds, particularly with respect to travel-related expenses.

Comments Regarding Travel-Related Spending

While the RFC formally focuses on the agency's use of a Travel Management Center,[1] it provides an appropriate opportunity to address broader concerns about the NCUA's travel-related spending. America's Credit Unions has long urged the agency to manage costs of its operations carefully—particularly in areas such as travel, where efficiencies and savings are both possible and necessary. Agency staff must have the necessary resources and flexibility to travel as needed to effectively carry out their responsibilities, including ensuring the safety and soundness of the credit union system and overseeing the National Credit Union Share Insurance Fund (SIF). Thus, there is a legitimate need for NCUA staff travel in conducting examinations, providing training, and fulfilling supervisory responsibilities. However, we have consistently raised concerns about increasing agency travel expenditures, particularly in light of the continued decline in the number of federally insured credit unions.

In forthcoming comments to the agency regarding reorganization, we will continue to urge the NCUA to renew its commitment to reducing travel-related expenses by expanding the use of offsite examinations, where appropriate given a credit union's risk profile and operational complexity. America's Credit Unions' and our legacy organizations have consistently urged the

[1] 90 Fed. Reg. 24,817 (June 12, 2025).

agency to modernize its approach to examinations by greater use of offsite and hybrid examinations.[2] Moving to this approach by default would not only conserve agency resources but also minimize disruptions to credit union operations.

While we recognize the value of in-person interaction, a hybrid model that relies more heavily on remote processes—without eliminating on-site visits entirely—would help the agency strike an appropriate balance between oversight, efficiency, and cost savings. A hybrid approach that maintains some in-person meetings is likely in the best interest of credit unions, the agency, and the agency's budget. In-person meetings between examiners and credit union management and quick opportunities to ask staff responsible for coordinating the examination questions about additional documents or information are important. Such interactions are key to ensuring that examiners have a clear understanding of the credit union's processes, particularly in instances where exceptions may have been identified. Although email is an effective method of communication, it is not a substitute for live conversations with credit union staff and management. It is important that examiners put in the time necessary to develop a good working relationship with credit unions to understand their unique needs and circumstances, as well as to keep management informed throughout the examination.

Beyond examinations, the agency should look at trimming travel-related expenses elsewhere, such as the SIF Administrative Expenses Budget, which saw a roughly 10 percent (or $530,000) increase overall.[3] While the actual dollar increase may be relatively small, we urge the Board to pursue cost savings wherever possible—especially given the substantial year-over-year decrease in federally insured credit unions.

The Board should work to contain travel costs not only through greater use of offsite examination procedures, but also by expanding virtual training options. For example, the SIF Administrative Expenses Budget included a sizeable increase related to state examiner training. Specifically, the over $1.5 million approved for travel in the 2025 SIF Administrative Expenses Budget includes the cost for state examiners to travel to NCUA-sponsored training classes. We fully endorse close collaboration and coordinated examiner training between the NCUA and the state supervisory authorities. This not only helps state examiners understand the NCUA examination process but also fosters the development of professional relationships. These relationships are critical for enhancing open communication between state examiners and NCUA staff, especially in the examination context for federally insured state-chartered credit unions. However, given the recent explosion in virtual connectedness, if NCUA examiners can examine a credit union

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[2] National Association of Federally-Insured Credit Unions Comments on Proposed 2022-2023 Budget (Dec. 8, 2021), https://www.nafcu.org/system/files/files/12.8.2021%20Letter%20to%20NCUA%20re%202022-2023%20NCUA%20Proposed%20Budget.pdf; Credit Union National Association Prepared Remarks for NCUA Budget Briefing (Nov. 16, 2023), https://ncua.gov/files/publications/budget/statements/cuna-budget-statement-20231116.pdf.

[3] NCUA 2025-2026 Operating Budget, Capital Budget, and National Credit Union Share Insurance Fund Administrative Expenses Budget (Dec. 17, 2024), https://ncua.gov/files/agenda-items/bam-2025-2026-budget-20241217.pdf.

remotely, then virtual trainings are certainly possible. Thus, going forward, we urge the NCUA to leverage technology to reduce travel-related expenses, including for state examiner training.

Beyond travel for examinations and training, America's Credit Unions encourages the agency to evaluate other categories of travel—such as conference attendance, staff retreats, and inter-office meetings—to ensure they are both mission-critical and cost-effective. The agency should apply the same scrutiny to internal travel that it does to external operations. For example, staff from the regions and the central office likely travel often for meetings that could be conducted virtually without sacrificing productivity or collaboration.

Additionally, to ensure accountability and transparency, the agency should implement a regular internal review of its travel management practices and policies to ensure they remain cost-effective. Proactive efforts to restrain unnecessary travel are especially important during a time of industry consolidation and declining numbers of federally insured credit unions, where fewer institutions are covering the cost of agency operations.

Conclusion

America's Credit Unions appreciates the opportunity to comment on the RFC regarding agency travel. We urge the NCUA to serve as a careful steward of credit unions' funds, with particular attention to managing staff travel expenses responsibly. Should you have any questions or require any additional information, please contact me, Regulatory Advocacy Senior Counsel at LMartone@americascreditunions.org or (202) 508-6743.

Sincerely,

Luke Martone

Luke Martone
Regulatory Advocacy Senior Counsel