National Credit Union Administration Justification for Non-substantive/not material change Reverse Mortgage Products – Guidance for Managing Risks OMB No. 3133-0187

NCUA made non-substantive changes to update wording.

A list of changes made are as follows:

- 1. Removed the word "Reputation" from title
- 2. Added a footnote for FR guidance.
- 3. Replaced words "reputation risks" with "risks"

These minor non-substantive changes do not alter the burden hours associated with this information collection.