National Credit Union Administration
SUPPORTING STATEMENT
Records Preservation, 12 CFR Part 749
OMB No. 3133-0032

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary.

Part 749 of the NCUA Rules and Regulations requires all federally insured credit unions to maintain a records preservation program. The program must be in writing and include a schedule for the storage and destruction of records and emergency contact information for employees, officials, regulatory offices, and vendors used to support vital records. The collection of information is authorized by sections 120, 203, and 209 of the Federal Credit Union (FCU) Act, 12 U.S.C. §§1766, 1783, and 1789, and Part 749 of the NCUA Regulations.

2. Purpose and use of the information collection.

A board of directors of a credit union is responsible for establishing a vital records preservation program within 6 months after its insurance certification is issued. The program must be in writing and contain procedures for maintaining duplicate vital records at a vital records center. The procedures must include the information prescribed in §749.2. Appendix A to this part provides guidance concerning the appropriate length of time credit unions should retain various types of operation records and Appendix B provides catastrophic act preparedness guidelines.

The records preservation program requirement enables federally-insured credit unions (FICUs) to reconstruct their vital records in the event records are destroyed by a catastrophe and facilitates restoration of vital member services.

3. Use of information technology.

The FCU Act does not prescribe any particular form in which the collected information must be kept. Therefore, to the degree that credit unions have available to them technology that would simplify maintaining the necessary information, they may use it to reduce the burden imposed by the regulation.

4. Duplication of information.

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

5. Efforts to reduce burden on small entities.

In April 2024, the agency issued an advance notice of proposed rulemaking to solicit comments on ways the agency can improve and update its records preservation program regulation and accompanying guidelines. A number of commenters stated that the recommendation in Appendix A to keep operational documents permanently is burdensome and results in the retention of significant amounts of records that have outlived their usefulness. The Board is considering future action based on the comments received.

6. Consequences of not conducting the collection.

Part 749 describes the obligations of all federally insured credit unions to maintain a records preservation program to identify, store, and reconstruct vital records in the event of destruction. The consequences of not having such a program are that services to members after a catastrophe would be delayed.

7. Inconsistencies with guidelines in 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 the agency.

A 60-day notice for this information collection was published in the *Federal Register* on December 12, 2025, at 90 FR 57781, soliciting comments from the public. No public comments were received in response to this notice.

9. Payment or gifts to respondents.

There is no intent by NCUA to provide payments or gifts for information collected.

10. Assurance of confidentiality.

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

11. Questions of a sensitive nature.

This is a recordkeeping requirement; no personally identifiable information (PII) is collected.

12. Burden of information collection.

As of September 2025, there were 4,331 FICUs. Each Credit Union is subject to the records preservation program requirements prescribed by Part 749. The record preservation program is a usual and customary business practice. NCUA estimates a monthly maintenance burden of two hours and a one-time annual burden of 8 hours to establish a program for new credit unions.

Recordkeeping	# Respondents	# Responses per Respondent	# Annual Response	Hours Per Respons e	Total Annual Burden
Retain and maintain a written vital records preservation program. (On Occasion)	4,331	1	4,331	2	8,662
Establish written program (One-time)	8	1	8	8	64
Totals					8,726

The cost to respondents is based on the 2025 GS-11 RUS salary table with an hourly labor rate of $39 per hour. The total annual cost to respondents is estimated to be $340,314.

13. Capital start-up or on-going operation and maintenance costs.

A records preservation plan and related contracting of off-site storage is a usual and customary business practices for financial institutions; therefore, associated costs do not apply.

14. Annualized costs to Federal government.

This is a recordkeeping requirement; therefore, there are no costs to the Federal government.

15. Changes in burden.

The number of respondents was updated to reflect the current number of FICUs to 4,331 and includes an estimate of approximately 8 new credit unions over the next 3 years. There was a decrease of 514 respondents from the previous PRA approval.

16. Information collection planned for statistical purposes.

No data will be published for statistical purposes.

17. Request non-display the expiration date of the OMB control number.

The OMB control number and expiration date associated with this PRA submission will be displayed on the Federal government's electronic PRA docket site at www.reginfo.gov.

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 employ statistical methods.