



November 15, 2024

Melane Conyers-Ausbrooks  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428.

RE: Notice of Submission to the Office of Management and Budget:  
Changes to NCUA Credit Union Profile (OMB Control Number 3133-0204)

Dear Ms. Conyers-Ausbrooks,

On behalf of its member credit unions, the Cooperative Credit Union Association, Inc. ("Association") appreciates the opportunity to comment on the National Credit Union Administration's (NCUA) submission to the Office of Management and Budget (OMB) for Paperwork Reduction Act review of changes to NCUA's Credit Union Profile information collection (NCUA Form 4501A). The Association is the state trade association representing approximately 200 state and federally-chartered credit unions located in the states of Delaware, Massachusetts, New Hampshire, and Rhode Island, which further serve over 3.6 million consumer members. The Association developed these comments in consultation with our members.

The Association is concerned that the proposed changes to the NCUA's Credit Union Profile will require significantly more paperwork burden than the agency estimates. NCUA states that this information collection will take only 2 hours of staff time each quarter (for 8 hours of staff time required annually per credit union).

The revised Profile includes nearly 90 changes. There are also several new questions about credit union vendors that we believe are unnecessary and should not be included in the Profile, such as the vendor-related questions on the General Information, Payment System Service Provider Information, and Information Technology pages. The NCUA does not have regulatory authority over credit union vendors, which calls into question the relevance of these aspects of the information collection.

Irrespective of whether these questions are necessary, however, we believe that the extensive information on vendors the revised Profile requires will mean that the revised Profile will take more than 2 hours per quarter for each credit union to complete. When NCUA last revised the Profile in 2023, it estimated that each credit union would need 1.57 hours per quarter (or about 1 hour and 34 minutes) to complete the Profile. *See Revisions of Agency Information Collection of a Previously Approved Collection; Request for Comments 88 Fed. Reg. 62,606 (Sep. 12, 2023)*. This means that NCUA estimates the additional questions about the vendors and other

topics the agency proposes to add at this juncture will only take an additional 26 minutes of staff time per credit union.

It is not reasonable to estimate that credit unions will only need to spend an additional 26 minutes to complete the revised Profile because credit unions will need to collect this vendor information prior to inputting this data into the Profile. While inputting the data alone may only take an additional 26 minutes, it will often take hours for credit unions to collect this information prior to inputting it, including having the credit union staffer filling out this form liaise with multiple other departments within the credit union such as IT, legal/compliance, accounting, etc.

Even if it only takes 2 additional hours of staff time per quarter to gather this information, it would result in a paperwork burden more than double the current 1.57 hours per quarter per credit union NCUA estimates are needed for credit unions to fill out the existing Profile.

For the first submission of the new Profile, however, we believe that it will take each credit union at least one day of staff time (i.e. 8 hours or more) for a single staffer to collect this information, and this staffer would need to liaise for 1 hour or more with at least 4 additional staffers from other departments in the credit union. This would result in an initial paperwork burden of a minimum 12 staff-hours to complete the December 2024 Profile alone.

We therefore believe that a paperwork burden estimate for this information collection of at least 4 hours per quarter of staff time (or 16 hours a year) per credit union is a more reasonable estimate than only 2 hours per quarter.

Thank you for the opportunity to comment on the NCUA Board's Notice of Submission to the Office of Management and Budget: Changes to NCUA Credit Union Profile. If you have any questions or desire further information, please do not hesitate to contact the Association at (508) 481-6755 or [govaff-reg@ccua.org](mailto:govaff-reg@ccua.org).

Sincerely,

Ronald McLean  
President/CEO  
Cooperative Credit Union Association, Inc.  
[rmclean@ccua.org](mailto:rmclean@ccua.org)