



October 27, 2023

Ms. Rena Y. Kim
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Re: NCUA Speaker and Chairman Request Forms; OMB Number: 3133–NEW

Dear Ms. Kim:

On behalf of America's credit unions, we are writing to the National Credit Union Administration (NCUA) on the Office of Management and Budget (OMB) request regarding the *Speaker and Chairman Request Forms*.¹ The Credit Union National Association (CUNA) and National Association of Federally-Insured Credit Unions (NAFCU) represent America's credit unions and their more than 138 million members.

As part of its interaction with the credit union industry, the NCUA receives requests for Board members and staff to participate in various speaking engagements throughout the year. The agency currently accepts requests through one of two forms accessible on NCUA.gov: a general *Speaker Request Form*² and a *Chairman Speaker Request Form*.³ The forms collect information regarding the requested speaking engagement, including the host organization, speaking topic, agenda, and additional event details. The agency is requesting approval from the OMB for a new information collection related to the two forms.

Regulated credit unions' ability to provide feedback to their federal regulator is of critical importance. A consistent, open dialogue is beneficial for both the NCUA and the credit unions it supervises and insures. It not only enables credit unions to bring emerging concerns to the attention of the agency's leadership but also allows the agency to be more efficient and effective.

Outside of the formal rulemaking and examination process, it is important for stakeholders and credit unions to be able to easily inform the agency about local trends and the impact of the agency's actions on member service. Maintaining a standardized process by which to request meetings with the agency helps ensure requesting parties

¹ 88 Fed. Reg. 58,621 (Aug. 28, 2023).

² NCUA Speaker Request Form, <https://ncua.gov/about/speaker-request-form>.

³ NCUA Chairman Speaker Request Form, <https://ncua.gov/about/ncua-board/honorable-todd-m-harper/event-request-form>.

have sufficient information on how to pursue direct meetings with Board and staff members.

Specific to the OMB request, we agree with the NCUA's assessment of the per response burden estimate of fifteen minutes per request, which is a reasonable amount of time to devote to such a request. While we believe the estimated time to complete each request form is appropriate, we have several suggestions on how the agency can improve the process overall.

- Streamline request forms: The existing forms on NCUA.gov should be reevaluated to ensure all fields are relevant to certain meeting requests. Mandatory fields may result in responses that are either unhelpful, confusing, or potentially inaccurate since the requester must complete the mandatory fields in order to submit the form. As such, we ask the NCUA to streamline the request forms—particularly the *Speaker Request Form*—to make optional certain fields, including the *Event Information* section of each form. We appreciate that the more information the agency elicits the greater its ability to make an informed decision on whether to accept a meeting request. However, requiring the requesting party to complete (virtually) all of the fields in the existing forms may lead to inaccurate or confusing responses.
- Enhance visibility of process: While the forms are accessible on NCUA.gov (and relatively easy to find), requesting credit unions and associations are often unaware that there is a formal process to request a meeting with the agency. Thus, we ask the NCUA to detail both in a written communication to credit unions and on its website exactly what is required in order to request a meeting with agency staff. The *Chairman Speaker Request Form* does include helpful information at the top of the form regarding meeting requests.
- Provide status updates: After a request is submitted, requesters receive a generic email indicating receipt. This is often the only response, absent a final determination of the request, which may not be received until months after the request, depending on how early a request is made. It would be very helpful if the generic response regarding receipt of a request included contact information for a dedicated staff member who is responsible for shepherding such requests through the approval process. Additionally, periodic updates regarding the status of a request would be beneficial, particularly since many credit unions and credit union associations often plan in-person trips to D.C. that coincide with such meetings.
- Share aggregate information: Again, we appreciate the NCUA's willingness to engage with the industry outside of the supervision context. This is something that reflects positively on the agency. As the primary federal credit union trade associations, we know firsthand the agency's willingness to meet with credit unions and associations, as we are often involved in the request process. Thus, it would be helpful to have general (aggregate) information regarding the number of meeting requests and meetings granted, including whether at the Board or staff level—and possibly even the department or division in which the staff member works. The

increased transparency provided to the industry through tracking and sharing this information would outweigh any associated costs to the agency, which would be minimal. Further, it is likely the agency is already tracking meeting requests in some manner. The agency could share this information annually with the industry, possibly as an addition to the NCUA's Annual Report.

Conclusion

On behalf of America's credit unions and their more than 138 million members, thank you for considering our comments regarding the meeting request forms. If you have questions about our comments, please do not hesitate to contact us at LMartone@cuna.coop or APetros@nafcu.org.

Sincerely,



Luke Martone
Senior Director of Advocacy & Counsel



Ann C. Petros
Vice President of Regulatory Affairs