



National Credit Union Administration
Office of Examination and Insurance

OEI/ASW:ASW
SSIC 2160

TO: NCUA Board of Directors

FROM: Director Myra M. Toeppe
Office of Examination and Insurance

SUBJ: 2021 Overhead Transfer Rate (OTR) Summary

DATE: December 11, 2020

Summary: The *Federal Credit Union Act* authorizes NCUA to expend funds from the National Credit Union Share Insurance Fund (Share Insurance Fund) for administrative and other expenses related to federal share insurance (12 U.S.C. §1783). An overhead transfer from the Share Insurance Fund covers the expenses associated with insurance-related functions of NCUA's operations.

At its November 16, 2017 Board meeting, the NCUA Board approved a simplified principles based methodology for calculating the OTR. The OTR formula is based on the following underlying principles to allocate agency operating costs:

1. Time spent examining and supervising federal credit unions is allocated as 50 percent insurance related.¹
2. All time and costs NCUA spends supervising or evaluating the risks posed by federally insured state-chartered credit unions or other entities the NCUA does not charter or regulate (for example, third-party vendors and CUSOs) is allocated as 100 percent insurance related.²

¹ The 50 percent allocation mathematically emulates an examination and supervision program design where NCUA would alternate examinations, and/or conduct joint examinations, between its insurance function and its prudential regulator function if they were separate units within NCUA. It reflects an equal sharing of supervisory responsibilities between NCUA's dual roles as charterer/prudential regulator and insurer given both roles have a vested interest in the safety and soundness of federal credit unions. It is consistent with the alternating examinations FDIC and state regulators conduct for insured state-chartered banks as mandated by Congress. Further, it reflects NCUA is responsible for managing risk to the Share Insurance Fund and therefore should not rely solely on examinations and supervision conducted by the prudential regulator.

² NCUA does not charter state-chartered credit unions nor serve as their prudential regulator. NCUA's role with respect to federally insured state-chartered credit unions is as insurer. Therefore, all examination and supervision work and other agency costs attributable to insured state-chartered credit unions is allocated as 100 percent insurance related.

3. Time and costs related to the NCUA’s role as charterer and enforcer of consumer protection and other non-insurance based laws governing the operation of credit unions (like field of membership requirements) are allocated as 0 percent insurance related.³
4. Time and costs related to the NCUA’s role in administering federal share insurance and the Share Insurance Fund are allocated as 100 percent insurance related.⁴

These four principles are applied to the activities and costs of the agency to arrive at the portion of the agency’s Operating Budget to be charged to the Share Insurance Fund.

At its December 18, 2020 Board meeting, the NCUA Board approved for a portion of NCUA’s capital budget expenditures to be reimbursed through the OTR. This approach ensures that the cost of new capital acquisitions is borne equitably among all federally insured credit unions at the time such acquisitions are made. This change also increases consistency with the OTR methodology, which generally requires that a proportionate share of expenses not exclusively related to the regulation of federal credit unions be borne in part by the Share Insurance Fund.

OTR Results for 2021

Based on the Board-approved methodology, the OTR for 2021 calculates as 62.3 percent. The OTR for 2020 was 61.3 percent. The primary driver of the increase in the 2021 OTR is the increase in the examination and supervision time for federally insured state-chartered credit unions (FISCUs) as a percentage of the total workload program hours from 27.7 percent in 2020 to 29.7 percent in 2021.

Distribution of Operating Budget Costs

The OTR represents insurance-related costs in the NCUA Operating Budget to be paid for out of the Share Insurance Fund; thus, 62.3 percent of the total operating budget will be paid out of the Share Insurance Fund. The remaining 37.7 percent of the Operating Budget will be paid for through the Federal Credit Union (FCU) Operating Fee.

Thus, the explicit and implicit distribution of total Operating Budget costs for FCUs and FISCUs is as follows:

Portion of Operating Budget covered by:	FCUs	FISCUs
FCU Operating Fee	37.7%	0.0%
OTR x Percent of Insured Shares	31.3% (62.3% x 50.3%)	31.0% (62.3% x 49.7%)
Total⁵	69.0%	31.0%

³ As the federal agency with the responsibility to charter federal credit unions and enforce non-insurance related laws governing how credit unions operate in the marketplace, NCUA resources allocated to these functions are properly assigned to its role as charterer/prudential regulator.

⁴ NCUA conducts liquidations of credit unions, insured share payouts, and other resolution activities in its role as insurer. Also, activities related to share insurance, such as answering consumer inquiries about insurance coverage, are a function of NCUA’s role as insurer.

⁵ Totals may not reconcile due to rounding.

ATTACHMENTS:

(1) Calculation of the 2021 Overhead Transfer Rate

cc: OCFO Mail
Chief Financial Officer Eugene Schied
All Risk Officers

Attachment 1**Calculation of the 2021 Overhead Transfer Rate****STEP 1 – Workload Program (2021)**

Allocation of Workload Hours				
Workload Programs	(A)	(B)	(A) x (B)	Allocation Basis
2021 Data	Budgeted Workload Hours	Percent Insurance-Related	Insurance-Related Workload Hours	
Federal Credit Union Examination and Supervision	494,782	50%	247,391	Based on allocation principle 1 reflecting the NCUA's roles as both prudential regulator and insurer.
State Credit Union Exam & Supervision	213,431	100%	213,431	Based on allocation principle 2 reflecting the NCUA's role as insurer.
Consumer Compliance Reviews & Related Training		0%	0	Based on allocation principle 3 reflecting the NCUA's role as prudential regulator.
Field of Membership & Chartering	300	0%	0	Based on allocation principle 3 reflecting the NCUA's role as charterer.
CUSO and Third-party Vendor Reviews	9,400	100%	9,400	Based on allocation principle 2 reflecting the NCUA's role as insurer. Field staff time conducting reviews of CUSOs and third-party vendors – NCUA does not charter or regulate CUSOs and third-party vendors.
Total	717,913	N/A	470,222	
Total Insurance-Related Workload Hours to Total Workload Hours			65.5%	Weighted average of field staff program time devoted to the NCUA's role as insurer.

NOTE: The totals may not reconcile exactly due to rounding.

STEP 2 – Financial Budget (2021)

Allocation of NCUA Operating Budget			
Cost Area	(A) Operating Budget \$Millions	(B) Percent Insurance- Related	(A) x (B) Operating Cost to be Borne by the Share Insurance Fund \$Millions
<p>Regions and ONES The financial budget for the agency’s five regional offices and ONES is allocated based on the weighted average of insurance-related activities calculated from the workload budget using principles 1, 2, and 3 in Step 1. Resources in the regions and ONES execute the NCUA’s examination program. Thus, the budgeted costs related to these programs should receive the same allocation basis as the programs themselves.</p>	\$155.8	65.5%	\$102.1
<p>Asset Management Assistance Center Manages liquidation payouts and assets acquired from liquidations on behalf of the Share Insurance Fund. Thus, the OTR allocation factor is based on principle 4 and allocated at 100 percent insurance-related.</p>	\$4.1	100.0%	\$4.1
<p>Office of Consumer Financial Protection This office is responsible for all functions related to consumer compliance, financial protection, and member education. These activities are allocated based on principle 3 as 0 percent insurance-related. The office does some work with respect to federally insured state-chartered credit unions, including share insurance coverage matters, in the NCUA’s role as insurer; these activities are allocated based on principle 4 as 100 percent insurance-related. The net of this combined activity results in an OTR allocation factor of 2.9 percent insurance-related.</p>	\$5.5	2.9%	\$0.2

<p>Office of Credit Union Resources and Expansion Processes charter applications and field of membership expansion requests. Provides consulting and training services for both federal credit unions and federally insured state-chartered credit unions. Also processes grants and loans for federally insured credit unions. Principle 1 is applied to the office's work with federal credit unions and principle 2 is applied to the office's work with federally insured state-chartered credit unions. Principle 3 is applied to the office's work related to chartering and field of membership. The net of this combined activity results in an OTR allocation factor of 23.0 percent insurance-related.</p>	\$8.7	23.9%	\$2.1
<p>Subtotal The 61.3 percent subtotal factor represents the dollar-weighted average of the above four cost centers (Regions and Ones, Asset Management Assistance Center, Office of Consumer Financial Protection, and Office of Credit Union Resources and Expansion) representing specific aspects of the NCUA's mission.</p>	\$174.1	62.3%	\$108.4
<p>All Other Offices This category includes the offices that design or oversee the agency's mission and its related offices, or provide necessary support to mission offices or the entire agency. As such, the proportion of insurance-related activities for these offices correspond to that of the mission offices. Therefore, these office costs are allocated based on the weighted average of insurance-related activities calculated in the subtotal above.</p>	\$159.3	62.3%	\$99.2
<p>Total</p>	\$333.4		\$207.6

NOTE: Numbers may not reconcile exactly due to rounding.

STEP 3 – Calculate the OTR

OTR Calculation	
Operating Costs to be Borne by the Share Insurance Fund	\$207.6
÷ Total Operating Budget	\$333.4
= OTR	62.3%