

BOARD ACTION MEMORANDUM

TO: NCUA Board

DATE: December 23, 2010

FROM: Robert M. Fenner, General Counsel

SUBJ: Interim Final IRPS 11-1 –
Supervisory Review Committee

ACTION REQUESTED: Board issuance of the attached interim final Internal Ruling and Policy Statement (IRPS) with a 30-day comment period.

DATE ACTION REQUESTED: January 13, 2011

OTHER OFFICES CONSULTED: Office of the Executive Director

VIEWS OF OTHER OFFICES CONSULTED: Concur.

BUDGET IMPACT, IF ANY: None.

SUBMITTED TO INSPECTOR GENERAL FOR REVIEW: Yes.

RESPONSIBLE STAFF MEMBER: Dave Marquis, Executive Director and Justin M. Anderson, Staff Attorney, Office of General Counsel.

SUMMARY: The attached interim final IRPS combines IRPS 95-1 and IRPS 02-1 and adds denials of technical assistance grant reimbursements to the types of determinations that credit unions may appeal to NCUA's Supervisory Review Committee. Staff recommends issuing the IRPS as an interim final IRPS pursuant to 5 U.S.C. §553(b)(3)(B), which allows agencies to forego the normal notice and comment procedures for rules that are interpretative rules, general statements of policy, or rules of agency organization, procedure, or practice.

RECOMMENDED ACTION: Recommend the Board issue the interim final IRPS with a 30-day comment period.

ATTACHMENT: Draft Interim Final IRPS.