

NCUA's Report on Implementation of the E-Gov Act

October 20, 2006

This is in response to Karen Evans' memo dated August 25, 2006, requesting a progress report on NCUA's implementation of the E-Gov Act of 2002.

1. NCUA's Overall implementation:

NCUA has always been a leader in information technology. We achieved full compliance with the Government Paperwork Elimination Act (GPEA) two years ahead of the government-wide deadline. We have been conducting the overwhelming majority of our information exchanges electronically, both inside the agency and with the industry we regulate and the public that we serve, for many years. Here are some highlights:

- The segment of the public that NCUA regulates and serves is the credit union industry, so most of the agency's interaction is with credit unions, not with individual citizens. Credit unions are required to report their financial condition to NCUA quarterly through the agency's Call Report program. This one PRA collection dwarfs all other NCUA collections combined. It constitutes most of the information collected from credit unions by NCUA. While NCUA still accepts paper reports, the agency strongly encourages electronic submissions. The overwhelming majority of credit unions choose to file their Call Reports electronically. They have long had the option of filing either by email or by mailing a diskette to NCUA. However, we also provide credit unions the option to submit their Call Reports directly over the Internet. Already, more than half the credit unions are using this option, which is simpler, faster and easier for them.
- In Government-to-Business financial transactions, NCUA strongly encourages Electronic Funds Transfer (EFT). NCUA only issues paper checks to institutions that are unable to accept EFT payments. NCUA uses EFT for payments to vendors for goods and services, dividends to credit unions, capitalization deposit refunds to credit unions, and Central Liquidity Facility (CLF) transactions.
- NCUA currently engages in electronic Government-to-Government exchanges by providing on-line access to credit union financial information to authorized staff of the Federal Reserve Board.

As the above examples demonstrate, NCUA conducts most of its business, both internally and externally, through electronic exchanges. These include other government partners, such as GSA and the Federal Reserve.

Our most recent electronic initiative is a new information dissemination channel for our principal stakeholders, the credit unions, called "NCUA Express." The Express system allows credit unions to receive NCUA communications via e-mail. Within hours of their publication, press releases, Letters to Credit Unions, Regulatory Alerts, and various other communications can be sent to subscribers via e-mail. Once they sign up for this service, they receive an e-mail message containing a brief description of each new publication along with a link to download the publication from Express' file server. There is no cost for this service and it is available to all federally-insured credit unions. As more credit unions sign up for this service, we are gradually reducing the cost of printing and mailing paper documents with a corresponding reduction in the amount of staff labor required to perform these tasks. Feedback from the credit unions on this initiative has been uniformly positive.

It is impossible to quantify how much each of these initiatives improved agency performance or reduced costs because we put them in place years before it was required. At the time, there was no mandate to measure the improvements; we implemented electronic government simply because it was a sound business strategy. Nonetheless, while we have no formal quantitative measures to report, it is clear that all of these initiatives were entirely successful.

While NCUA's preferred method of information exchange is electronic, we still disseminate all of our official publications in hard copy so that anyone who does not have Internet access will not be left out. However, to reduce our operating costs, we remove all Express subscribers from our paper distribution list.

2. Brief description of the process the agency has established for determining which information will be made available on the Internet as described in Section 207 of the Act.

NCUA's policy is simple: all agency information that is obtainable under the Freedom of Information Act (FOIA) is made available on our Internet website (www.ncua.gov). We do not need a detailed schedule for making this information public. We publish it as soon as practicable after it becomes available. Our top priority has always been to publish the results of NCUA Board meetings on our website; typically, this information is posted within an hour of the end of the meeting.

Given the speed with which we are able to post new information, and the fact that all publicly available information gets posted, there is no need to request public comment on the process of posting it.

3. Describe how information dissemination activities are coordinated with FOIA operations in order to improve both access to and dissemination of government information to the public.

Responsibility for the agency's Freedom of Information Act activities is within the Office of General Counsel and, given the integral role this office has in regulatory and policy matters of interest to the public, key personnel within OGC are involved and have responsibilities both for FOIA and generation of information of interest to the public. OGC staff produces or is consulted on a significant portion of the content posted to the agency's website (and released using the agency "Express Subscription" service) including, proposed and final regulations, policy statements, advisory letters to credit unions, formal legal opinions, and so forth.

The Deputy General Counsel is the agency's Chief FOIA Officer and the Associate General Counsel for the Operations Division within the Office of General Counsel, who reports to the Deputy General Counsel, serves as the FOIA Public Liaison. The AGC supervises a staff attorney and regulatory specialist who handle the day-to-day FOIA activities. In addition, the AGC for Operations serves as the agency's Senior Agency Official for Privacy and, as a result, works with the Office of the Chief Information Officer on various matters concerning privacy, information dissemination, and regulatory compliance.

These reporting relationships and responsibilities ensure coordination of FOIA responses and disclosure of public information via the agency's website and agency publications. In effect, these reporting relationships and responsibilities ensure the agency's compliance with provisions for categorizing of information under section 207(d) and public access to electronic information under section 207(e). For example, legal staff ensures that recent proposed or final regulations are posted to the agency website within 24-hours of Board approval, and coordinates with the NCUA Board Secretary to ensure that public comment letters are posted along side proposed regulations. In addition, FOIA staff seeks to ensure that any so-called "popular FOIAs" are posted to the agency's website so that the public need not submit a request to gain access.

The following are, respectively, the links to NCUA's Information Resources Management Strategic Plan and to NCUA's review and improvement plan documents prepared as required by Executive Order 13392: www.ncua.gov/ReportsAndPlans/plans-and-reports/NCUA_Strategic_Plan_2003-2008.pdf and www.ncua.gov/FOIA/FOIAExecutiveOrder13392.pdf. NCUA does not fund federal research and development activities and, therefore, provides no response regarding Section 207(g).