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# State of New Hampshire

## Banking Department

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October 27, 2021

His Excellency, Governor Christopher T. Sununu  
And the Honorable Executive Council  
State House  
Concord, New Hampshire 03301

### REQUESTED ACTION

The New Hampshire Banking Department (NHBD) respectfully requests authority to continue its membership and participation in the National Association of State Credit Union Supervisors (NASCUS), Vendor Number 170814, in the amount of \$16,322, effective upon Governor and Council approval **retroactive** for the period July 1, 2021, through June 30, 2022. **100% Other Funds.**

Funds to support this request are available in the following account in State FY 2022, 100% Other Funds, Bank Exams and Assessment:

<u>Account</u>	<u>Description</u>	<u>FY 2022</u>
010-07200-20460000-026-500251	Dues	\$16,322.00

### EXPLANATION

NASCUS, a professional regulators association, is the primary resource and voice of the 45 state governmental agencies that charter, regulate and examine the nation's state-chartered credit unions. NASCUS is the only organization dedicated to the defense and promotion of the state credit union charter and the autonomy of state credit union regulatory agencies.

State credit union regulators formed NASCUS in 1965 to ensure the safety and soundness of state-chartered credit unions. Today, it represents the interests of the state credit union agencies before U.S. Congress, defends the dual chartering system and advances state agency and examiner education programs.

NASCUS is also the primary resource for regulatory, legislative and compliance information for the state credit union regulatory agencies.

The following are the standard organization dues and membership questions and answers for Governor and Council approval.

1. How long has this organization been in existence and how long has this agency been a member of this organization?

State credit union regulators formed NASCUS in 1965. The NASCUS mission is to enhance state credit union supervision and advocate for a safe and sound credit union system. It represents the interests of all state credit union supervisors before U.S. Congress and acts as a liaison between state agencies and the National Credit Union Administration (NCUA). NASCUS also developed a training program for state examiners. NHBD has been a member since 1971.

2. Is there any other organization that provides the same or similar benefits to which your agency belongs?

No. NASCUS is the only organization dedicated to the defense and promotion of the state credit union charter and the autonomy of state credit union regulatory agencies.

3. How many other states belong to this organization and is your agency the sole New Hampshire state agency that is a member?

NASCUS includes 45 regulatory agencies (Delaware, South Dakota and Wyoming have no laws permitting state-chartered credit unions). NHBD is the sole member of the State of New Hampshire due to the purpose of this organization.

4. How is the dues structure established? (Standard fee for all states, based on population, based on other criteria, etc.)

NASCUS membership is on a fiscal year basis (July 1 – June 30), and annual dues are calculated based on the total assets under agency supervision as of December 31, 2019. NHBD regulates ten credit unions with total assets of \$4.8 billion as of December 31, 2019. NASCUS uses December 2019 assets data to calculate 2022 dues to avoid the impact of inflated assets on dues calculations.

5. What benefit does the state receive from participating in this membership?

Membership allows interaction with other state and federal agencies and to have representation in challenging situations. NASCUS provides training opportunities for state bank examiners.

6. Are training or educational/research materials included in the membership? If so, is the cost included? Explain in detail.

Yes. Educational/research materials include conferences, schools and programs, informational webinars, numerous publications, press releases, and facts/figures.

NASCUS membership does not directly cover the training cost; however, the cost of training is sometimes reimbursed by the NCUA in full.

7. Is the membership required to receive any federal grants or required to receive or participate in licensing or certification exams? Explain.

No.

8. Is there any travel included with this membership fee? Explain in detail any travel to include the number of employees involved, the number of trips, destination if known and purposes of membership-supported trips.

No, however, the NCUA sometimes covers travel expenses for NASCUS meetings and training. NHBD typically sends one or two management or examination staff members to the NASCUS-sponsored annual State System Summit – locations vary across the country.

Throughout the year, NASCUS holds numerous teleconferences where members/participants phone in from around the country; discussion topics include circumstances that collectively impact the regulatory system and allow participants to gain valuable information.

9. Which state agency employees are directly involved with this organization? (Indicate if they are members, voting members, committee members, and officers of the organization.)

The Commissioner, Deputy Commissioner, Chief Bank Examiner and Banking Division examiners are involved with NASCUS. None of those above individuals are committee members or officers.

NASCUS membership is available to state agencies responsible for supervising state-chartered credit unions, the District of Columbia and the Commonwealth of Puerto Rico. Each agency shall be represented by the official responsible for the supervision of state-chartered credit unions in that jurisdiction or by a representative, duly designated by such official, and who is an employee of the agency or department of that jurisdiction. Every regulator member shall be entitled to one vote on issues brought properly before the membership.

10. Explain in detail any negative impact to the State if the agency did not belong to this organization.

To effectively fulfill its mission, NHBD must continue to interact and partner with other regulators at the state and federal levels. This is a key and lasting characteristic of the financial institution's regulatory system. NASCUS facilitates this interaction relative to credit unions; the Conference of State Bank Supervisors (CSBS) accomplishes a similar mission relative to banks. Regulation and supervision are not stagnant – it evolves and changes, often-times to a significant degree. Consistency is imperative.

Discontinuing NHBD's membership would result in the following detrimental impacts:

- ability to defend NHBD's interests, particularly on a national scale, would be significantly reduced;
- loss of mechanism for collective communications with our peers (regulators from other states);
- loss of centralized information source regarding current and emerging regulatory issues; and
- loss of training/developmental opportunities.

In summary, NHBD would undoubtedly become more isolated and would lose efficiencies and effectiveness.

A copy of the invoice is attached for your review.

Your consideration of our request is appreciated.

Respectfully submitted,

**Gerald H. Little**

Digitally signed by Gerald H. Little  
Date: 2021.10.08 13:10:17 -04'00'

Gerald H. Little  
Bank Commissioner

GHL/mj  
Enclosure



The National Voice of the State Credit Union System

April 26, 2021

**2021-2022 DUES INVOICE for State of New Hampshire**

- NASCUS dues cover the period of July 1 to June 30, and are typically based on December 31 asset data from the previous year. Because of the unprecedented asset growth that has occurred for most states since March 2020 related to COVID-19 relief measures and stimulus payments, NASCUS will be using December 2019 asset data to calculate 2021-2022 dues using the Year 4 formula of our 5-Year dues model. This will avoid the impact of inflated assets on dues calculations.
- We have calculated your dues invoice based on (a) your reported credit union assets under supervision and (b) the dues model that was approved by NASCUS regulator membership in August 2017. This invoice is for your state's 2021-2022 NASCUS dues.
- Return the invoice along with a check or authorize a payment by ACH by July 31, 2021, the due date for renewing membership in NASCUS for 2021-2022.
- If you have any questions related to your invoice or have extenuating circumstances that may require forbearance measures, please contact Lucy Ito at [lito@nascus.org](mailto:lito@nascus.org) or Doug McGuckin at [doug@nascus.org](mailto:doug@nascus.org).

**2021-2022 Dues Summary**

Category of Assets Supervised	Base Rate	Factor Applied to Square Root of Assets Supervised	Maximum Amount for Each Category Bracket
\$0--\$1,000,000,000	-	0.2540404302	\$ 8,033
\$1,000,000,001--\$10,000,000,000	\$ 8,033	0.2190003708	\$ 23,008
\$10,000,000,001+	\$ 23,008	0.1795803041	\$ 62,500 cap

Assets Under Supervision	Amount Due
\$ 4,826,359,000	\$ 16,322

Please make your payment to:

**National Association of State Credit Union Supervisors  
 1655 N. Ft. Myer Drive, Suite 650  
 Arlington, VA 22209**

**NASCUS TIN -- 54-1167527**

*Please remit one copy with your payment and retain one copy for your records.*

***Thank you for your 2021-2022 NASCUS membership.***