CSG

State of New Hampshire

Banking Department

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August 30, 2024

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 $5,000, effective upon Governor and Council **retroactive** approval for the period July 1, 2024, through June 30, 2025. **100% Other Funds (Exams and Assessment Fees).**

Funds to support this request are available in account, Banking, as follows:

Account	Description	FY 2025
010-072-072-720010-20460000-026-500251	Organizational Dues	$5,000

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 46 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 at calendar year end. However, NASCUS waived a portion of NHBD's dues, which would have been in excess of $18,000 if calculated based on the total assets under agency supervision.

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,

Emelia Galdieri

Emelia A. Galdieri
Bank Commissioner

Enclosure

NASCUS

The National Association of State Credit Union Supervisors

April 24, 2023

2023-2024 DUES INVOICE for State of New Hampshire

Annual dues for the year July 1, 2023 through June 30, 2024 are calculated based on the amount of credit union assets under your agency's supervision, as of December 31, 2022.

- The first step in this process was to confirm the actual amount of credit union assets under your supervision based on December 31, 2022 Call Report data.
- We have calculated your dues invoice based on (a) your reported credit union assets under supervision and (b) the dues formula noted below.
- Please return the invoice along with a check or authorize a payment by ACH by July 31, 2023, the due date for renewing membership in NASCUS for 2023-2024.
- If you have any questions related to your invoice or have extenuating circumstances that may require forbearance measures, please contact Brian Knight at brian@nascus.org or Doug McGuckin at doug@nascus.org.

2023-2024 Dues Formula

Square root of assets under supervision multiplied by 0.2409004079 (with a cap of $76,500)

Assets Under Supervision	Amount Due
$ 6,222,113,767	$ 5,000*

**Partial dues waiver applied*

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 2023-2024 NASCUS membership.