



National Credit Union Administration

October 5, 2023

SENT BY E-MAIL
(SBrownell@CUCollaborate.com)

Sam Brownell, Founder & CEO
CUCollaborate
1729 D Street SE
Washington, DC 20003

Dear Mr. Brownell:

This letter responds to your October 2, 2023 FOIA request to the NCUA for a data file, in Excel format, listing detailed results of the NCUA's most recent low-income designation (LID) analysis reports to include: 1) number of FAS members; 2) estimated number and percentage of members who qualify and do not qualify for LID; 3) P.O. box addresses; 4) businesses; 5) unknown accounts; and 6) CU join number. You also requested the dataset from which the estimates were based.

Your request is granted in part. Attached are some of the data responsive to your request. We considered the foreseeable harm standard when reviewing records for public release. Withheld information is exempt under one or more of the FOIA exemptions at 5 U.S.C. § 552(b)(4), (5), (6) and (8).

Subsection (b)(4) protects from disclosure trade secrets and commercial or financial information obtained from a person, which is considered privileged or confidential. Subsection (b)(5) protects inter-agency or intra-agency memorandums, letters, or other communications. Subsection (b)(6) protects information about individuals when its disclosure would constitute a clearly unwarranted invasion of personal privacy. Subsection (b)(8) protects matters that are contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions.

Also attached is an invoice to process your request. To pay electronically, use this link: <https://www.pay.gov/public/form/start/35151723>. Please choose "FOIA Payment" as the Purpose of Payment in the electronic form. Please also enter the Request Number (24-FOI-00003) or the Invoice Number (562) in the invoice number of the Pay.Gov form.

For further assistance or to discuss your request, you may contact FOIA staff by phone at 703.518.6540 or email at FOIA@ncua.gov, as well as the agency FOIA Public Liaison at the same contact points. You also have the option to contact the Office of Government Information Services (OGIS) at National Archives and Records Administration (NARA) to inquire about FOIA mediation services. Contact information for OGIS is: NARA, 8601 Adelphi Road-OGIS, College Park, MD 20740-6001; email ogis@nara.gov; phone 202.741.5770; toll-free 1.877.684.6448; or fax 202.741.5769.



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If you are not satisfied with the FOIA response, you may file an administrative appeal. It must be in writing and electronically transmitted, or postmarked, within 90 days from today. If you file an appeal, please write "FOIA-APPEAL" in the subject line if by email to FOIA@ncua.gov (or in the letter and on the envelope if mailed) addressed to: National Credit Union Administration, Office of General Counsel - FOIA APPEAL, 1775 Duke Street, Alexandria, VA 22314-3428.

Sincerely,

Elizabeth Harris
Associate General Counsel for
Information and Access Law

GC/EH:CS
24-FOI-00003
Attachments