

## Burgos, Alexander N

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**From:** Warren, Caroline C  
**Sent:** Tuesday, January 28, 2025 9:22 AM  
**To:** Wiggs, Travis C  
**Cc:** Burgos, Alexander N; Ray, Kristina W; Badwan, Rana  
**Subject:** RE: Periodic Review 04 NCAC 06

Thank you, Travis.

**Caroline C. Warren**  
**Investigations & Chartering Manager**

North Carolina Credit Union Division  
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**From:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>  
**Sent:** Tuesday, January 28, 2025 9:15 AM  
**To:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>  
**Cc:** Burgos, Alexander N <[alexander.burgos@oah.nc.gov](mailto:alexander.burgos@oah.nc.gov)>; Ray, Kristina W <[kristina.ray@nccud.nc.gov](mailto:kristina.ray@nccud.nc.gov)>; Badwan, Rana <[rbadwan@ncdoj.gov](mailto:rbadwan@ncdoj.gov)>  
**Subject:** RE: Periodic Review 04 NCAC 06

Good morning,

I'm satisfied with your proposed timeline. I intend to recommend that the RRC approve the May 1, 2027 readoption deadline at the February 27<sup>th</sup> meeting.

Thanks,

Travis C. Wiggs  
Rules Review Commission Counsel  
Office of Administrative Hearings  
Telephone: 984-236-1929  
Email: [travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)

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**From:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>  
**Sent:** Tuesday, January 28, 2025 8:58 AM  
**To:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>  
**Cc:** Burgos, Alexander N <[alexander.burgos@oah.nc.gov](mailto:alexander.burgos@oah.nc.gov)>; Ray, Kristina W <[kristina.ray@nccud.nc.gov](mailto:kristina.ray@nccud.nc.gov)>; Badwan, Rana <[rbadwan@ncdoj.gov](mailto:rbadwan@ncdoj.gov)>  
**Subject:** RE: Periodic Review 04 NCAC 06

Good morning, Travis,

NCCUD agrees on the May 1, 2027, readoption deadline. We propose the following planned timeline for readoption:

February 2025 – April 2026

- Engage staff and credit union industry to get feedback on rules.
- Identify which rules, if any, could be readopted without substantive changes.
- Identify which rules will require substantive changes in content, scope, and implementation.

April 2026

- Present the rules to the NC Credit Union Commission.

May 2026 – September 2026

- Consult with OSBM regarding development and its approval of fiscal notes

October 2026 – May 2027

Begin readoption of rules and follow rulemaking procedures:

- Notice of text to OAH
- Publication in NC Register
- Comment period
- Adoption
- RRC attorney review and exchange with NCCUD
- Submission to RRC

Please let us know if you have questions or need additional information.  
Thank you,

**Caroline C. Warren**  
**Investigations & Chartering Manager**

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**From:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>

**Sent:** Friday, January 24, 2025 10:26 AM

**To:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>

**Cc:** Burgos, Alexander N <[alexander.burgos@oah.nc.gov](mailto:alexander.burgos@oah.nc.gov)>; Ray, Kristina W <[kristina.ray@nccud.nc.gov](mailto:kristina.ray@nccud.nc.gov)>; Badwan, Rana <[rbadwan@ncdoj.gov](mailto:rbadwan@ncdoj.gov)>

**Subject:** RE: Periodic Review 04 NCAC 06

Good morning,

The Periodic Review/Readoption process is taking place over a 10-year period and involves all the state agencies subject to rulemaking. My colleague and I are attempting to spread the rules out as much as possible while doing our best to accommodate the needs and priorities of each agency. Since I sent you the original email below (1/7/25), we now have 159 rules that are set for readoption by March 1, 2027.

I'm proposing that your agency's readoption deadline now be set for **May 1, 2027**. If we agree on the May 1, 2027 deadline, you will want to reconsider the proposed readoption deadline below. Please be mindful of 150B-21.2(g) that says once you publish a rule in the Register, it starts the 1-year clock for adoption, or the publication expires.

Please let me know your thoughts and send me your proposed readoption timeline by March 7, 2025.

Thanks,

Travis C. Wiggs

Rules Review Commission Counsel

Office of Administrative Hearings

Telephone: 984-236-1929

Email: [travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)

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**From:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>

**Sent:** Friday, January 24, 2025 9:58 AM

**To:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>

**Cc:** Burgos, Alexander N <[alexander.burgos@oah.nc.gov](mailto:alexander.burgos@oah.nc.gov)>; Ray, Kristina W <[kristina.ray@nccud.nc.gov](mailto:kristina.ray@nccud.nc.gov)>; Badwan, Rana

<[rbadwan@ncdoj.gov](mailto:rbadwan@ncdoj.gov)>

**Subject:** RE: Periodic Review 04 NCAC 06

Good morning, Travis,

We anticipate some of the rules may require fiscal notes, so we want to build in time to properly develop regulatory impact analyses.

We respectfully request a readoption deadline of March 1, 2027.

Thank you,

**Caroline C. Warren**  
**Investigations & Chartering Manager**

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**From:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>

**Sent:** Tuesday, January 7, 2025 12:10 PM

**To:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>

**Cc:** Burgos, Alexander N <[alexander.burgos@oah.nc.gov](mailto:alexander.burgos@oah.nc.gov)>; Ray, Kristina W <[kristina.ray@nccud.nc.gov](mailto:kristina.ray@nccud.nc.gov)>; Badwan, Rana <[rbadwan@ncdoj.gov](mailto:rbadwan@ncdoj.gov)>

**Subject:** RE: Periodic Review 04 NCAC 06

December 1, 2026 is the proposed readoption deadline, however, if you desire a date less than two years in the future, we can likely agree to that date at this time.

Please be mindful of 26 NCAC 05.0212(c)(2) that requires agencies to file rules with the RRC within 30 days of adoption. Also, remember to consider whether your agency will need to prepare any fiscal notes

as required by G.S. 150B-21.4. Lastly, please account for whether your agency will want to amend any rules after the public comment period and rulemaking hearing that may constitute a substantial change under 150B-21.2(g).

Thanks,

Travis C. Wiggs  
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Office of Administrative Hearings  
Telephone: 984-236-1929  
Email: [travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)

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**From:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>  
**Sent:** Tuesday, January 7, 2025 11:50 AM  
**To:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>  
**Cc:** Burgos, Alexander N <[alexander.burgos@oah.nc.gov](mailto:alexander.burgos@oah.nc.gov)>; Ray, Kristina W <[kristina.ray@nccud.nc.gov](mailto:kristina.ray@nccud.nc.gov)>; Badwan, Rana <[rbadwan@ncdoj.gov](mailto:rbadwan@ncdoj.gov)>  
**Subject:** RE: Periodic Review 04 NCAC 06

Good morning, Travis and Alex,

Thank you for the update and next steps. Is the readoption deadline date you mentioned (December 1, 2026) correct or should it be December 1, 2025? Just wanted to confirm that seems so far off...but I know how time flies. 😊

We will review and get back to you with our questions.

Thanks,

**Caroline C. Warren**  
**Investigations & Chartering Manager**

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**From:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>  
**Sent:** Tuesday, January 7, 2025 10:41 AM  
**To:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>  
**Cc:** Burgos, Alexander N <[alexander.burgos@oah.nc.gov](mailto:alexander.burgos@oah.nc.gov)>  
**Subject:** FW: Periodic Review 04 NCAC 06

Good morning,

The attached periodic review reports have been finalized. The next step is to set a deadline for the readoption of the “Necessary” rules. Pursuant to G.S. 150B-21.3A and 26 NCAC 05 .0212, the RRC sets this deadline after consultation with the agency, and this email serves as the RRC’s request for that consultation. Please review 26 NCAC 05 .0212 for the information required to be submitted to the RRC, and the deadlines for doing so.

The deadline for your agency to provide this information is March 7, 2025. As a starting point, I would recommend a December 1, 2026, readoption deadline, but I am open to considering a different recommendation based on the needs of your agency.

Let me know if you have any questions. Thank you.

Travis C. Wiggs  
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**From:** McGhee, Dana <[dana.McGhee@oah.nc.gov](mailto:dana.McGhee@oah.nc.gov)>  
**Sent:** Thursday, January 2, 2025 1:02 PM  
**To:** Warren, Caroline C <[caroline.warren@nccud.nc.gov](mailto:caroline.warren@nccud.nc.gov)>  
**Cc:** Wiggs, Travis C <[travis.wiggs@oah.nc.gov](mailto:travis.wiggs@oah.nc.gov)>  
**Subject:** Periodic Review 04 NCAC 06

Good afternoon, Caroline,

The determinations in the attached periodic review report for 04 NCAC 06 were effective December 31, 2024. Commission Counsel Travis Wiggs will reach out to you to discuss setting the readoption date for the rules in the report.

Rule 04 NCAC 06C .0404 that was designated unnecessary, expired January 1, 2025.

Let me know if you have any questions.

**Dana McGhee**

*Publications Coordinator*  
*Office of Administrative Hearings*  
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