

From: rhoffman@cusocal.org
To: [Regulatory Comments](#)
Subject: Comments on Proposed Interagency Standards for Assessing Diversity Policies and Practices
Date: Thursday, January 23, 2014 1:52:25 PM
Attachments: [myLetter.pdf](#)

January 23, 2014

National Credit Union Administration
Gerald Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Proposed Interagency Standards for Assessing Diversity Policies and Practices

Dear Gerald Poliquin,

This comment letter represents the views of Credit Union of Southern California (CU SoCal) regarding the National Credit Union Administration's (NCUA's) proposal for Standards for Assessing Diversity Policies and Practices as directed by Section 342 of the Dodd-Frank Act. CU SoCal has 58,000 members, \$731 million in assets, and 175 employees. We appreciate the opportunity to provide the NCUA with comments regarding this proposed rule.

CU SoCal recognizes that the NCUA, as directed by the Dodd-Frank Act, is responsible for reviewing the policies and practices of credit unions based on the following four main areas:

1. Organization commitment to diversity and inclusion
2. Workforce profile and employment practices
3. Procurement and business practices—supplier diversity
4. Practices to promote transparency of organization diversity and inclusion

We support that the term "assessment" encompasses a wide variety of assessments, including self-assessment. This clarification will allow credit unions to take into account their individual situation (e.g., asset size, number of employees, number of Members, governance structure, income, geographic location, and community characteristics) which promotes fairness across the movement.

We are also pleased that NCUA does not envision the assessment in this area as one of a traditional examination or supervisory assessment. We support the NCUA in its belief that the policies and/or practices that promote transparency and awareness of diversity and inclusion are the right approach.

CU SoCal applauds NCUA for their efforts to implement the guidance from Section 342 of the Dodd-Frank Act on diversity and inclusion practices. This will only strengthen credit unions' efforts to further demonstrate our focus on being community partners.

Sincerely,

Rick Hoffman
VP, Business Development and Legislative Affairs
Credit Union of Southern California

cc: CCUL