

From: [Clint Hartmann](#)
To: [Regulatory Comments](#)
Cc: syashewski@tcu.coop
Subject: Proposed Interagency Policy Statement
Date: Friday, January 31, 2014 12:23:05 PM

Re: Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Regulated Entities

Dear Mr. Poliquin:

This letter represents the views of Houston Texas Fire Fighters Federal Credit Union (HTFFFCU) regarding the NCUA's proposal on diversity standards. HTFFFCU serves the financial needs of the Houston Fire Department and their families.

We do not have 100 employees and are not required to report to EEOC on our diversity policies and practices. Because we are committed to diversity we in fact do have policies in place.

What we do not have is the capability to provide diversity information on our suppliers. This would be another useless regulatory requirement because we would have no impact on their practices. Can you imagine HTFFFCU requiring Office Depot to provide their diversity information? What would we do with it? Start replacing vendors over their diversity programs even if they are the most cost effective.

HTFFFCU has had to add a Vice President Level position to keep up with all the new regulatory requirements in the past few years. Are we to add someone to monitor our vendors? I do not think so.

HTFFFCU highly recommends that the requirement to monitor vendors be eliminated.

Thank you for your consideration.

Respectfully,

Clinton C Hartmann, CCUE
President/CEO



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