

February 4, 2014

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration

Sent VIA E-Mail: regcomments@ncua.gov

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

Dear Mr. Poliquin:

Southwest Heritage Credit Union appreciates the opportunity to comment on the Proposed Interagency Policy Statement establishing Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities.

Southwest Heritage Credit Union certainly supports diversity, however, we are a small to mid-size financial institution, and our senior employees already perform multiple duties, and we believe that forcing a "one-size fits all" approach is wrong. Credit Unions are not like other financial institutions as we are member-owned and not for profit. We would prefer it if each Agency provided guidance for their entities.

There are too many aspects of this proposal that will be difficult if not impossible to comply with if you are a small financial entity. Geographic limitations exists for those in rural areas as the population/membership may not be "diversified", thereby prohibiting a diverse workforce. Smaller institutions also struggle with costs associated with compliance. The burden in time and money takes away from our central purpose of serving our membership.

Small to mid-size institutions' resources are already thin, and to try and collect and assemble meaningful data in order to:

Assess and evaluate our vendors' diversity;

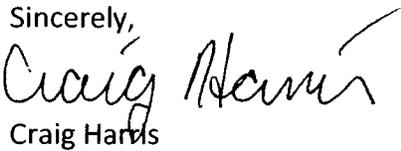
Determine whether or not a business is woman or minority owned

Then track spending with these entities,

Also provide metrics to track and measure inclusiveness.

We respectfully object to basically the entire proposal as currently written and would support something that would address our situation more specifically instead of this overly broad proposal.

Sincerely,

A handwritten signature in black ink that reads "Craig Harris". The signature is written in a cursive style with a prominent flourish at the end of the name.

Craig Harris

Vice President of Audit and Compliance

Southwest Heritage Credit Union

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