

From: [James Boyd](#)
To: [Regulatory Comments](#)
Cc: syashewski@cornerstoneleague.coop
Subject: Abilene Teachers Federal Credit Union Comments on Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Regulated Entities
Date: Thursday, February 06, 2014 3:51:27 PM

February 6, 2014

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

Sent via e-mail to: regcomments@ncua.gov

RE: Abilene Teachers Federal Credit Union Comments on Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Regulated Entities

Dear Mr. Poliquin:

The Abilene Teachers Federal Credit Union is a \$371 million dollar credit union serving 39,000 very diverse members. These diverse members are concentrated in sixteen diverse West Texas counties, but many are scattered across our very diverse globe.

Once again Abilene Teachers Federal Credit Union (ATFCU) finds itself responding to the over-reaching Dodd-Frank Act. This proposal was issued as a joint statement for all financial institutions and lumps credit unions in with banks and other such financial institutions rather than consider the unique nature of credit unions. Rather than issue a joint statement, why not give NCUA's Office of Minority and Women Inclusion Office something to do? They could study this for several years and finally come up with a way to minimize the burdens on credit unions.

ATFCU objects to the requirement that credit unions assess diversity practices in their relationships with their suppliers and contractors. Not even Dodd-Frank requires that mandate of the agencies. NCUA should exclude data relating to contractor and supplier relationships from all assessment standards. Most credit unions have few employees and little time to squander on a waste of time like this.

Requiring credit unions to publicly disclose their diversity policies does not aid NCUA in its assessment and is not even required by Dodd-Frank. ATFCU opposes the public disclosure of diversity policies of all credit unions.

A reading of section 342(b)(4) of the Dodd-Frank Act finds that nothing in the applicable portion of the Act may be construed to require any specific action based on the finding of the assessment.

ATFCU interprets this to mean that NCUA can collect data where appropriate, but it cannot require credit unions to implement specific diversity related policies or practices. This begs the question: why are we doing this?

Sincerely,

James Boyd
President/CEO

James Boyd
President / CEO



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