



February 7, 2014

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

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

Dear Mr. Poliquin:

I am writing on behalf of Suncoast Credit Union (Suncoast), a not-for-profit, cooperative financial institution that serves over 560,000 members along the west coast of Florida. We are a state-chartered, federally insured credit union with 54 branches and over \$5 billion in assets. We appreciate the opportunity to comment on the Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities.

Suncoast is an Equal Opportunity Employer subject to Equal Employment Opportunity Commission (EEOC) guidelines and reporting. We have a strong history of supporting diversity in the workplace and remain committed to that endeavor. We agree with the intent of the proposed standards to promote diversity and inclusion.

However, we have some serious concern over the additional burden of reporting referred to in the proposal. Specifically, the following would result in additional costs to collect and track the data:

- Maintaining metrics to evaluate and assess workforce diversity would require more resources and open an organization to unjustified scrutiny.
- Gathering statistics and data of the ethnicity and gender of our contractors and subcontractors would be difficult and may result in not receiving the most competitive pricing for qualified contractors resulting in increased costs to our members.

We applaud the agency for addressing this important matter. Suncoast has always been committed to creating and maintaining a diverse and dynamic workforce and support the essence of the standards as proposed with some adjustments as described above. Again, thank you for the opportunity to comment on this important matter.

Sincerely,

A handwritten signature in black ink that reads "David Gonzalez". The signature is written in a cursive, flowing style.

David Gonzalez
Vice President/Compliance Officer