

From: j.smith@ecutx.org
To: [Regulatory Comments](#)
Subject: proposed diversity policy
Date: Friday, January 31, 2014 9:46:04 AM

January 31, 2014

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Association

Sent VIA E-Mail: regcomments@ncua.gov

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

Dear Mr. Poliquin:

As the CEO/President of Educators Credit Union, a mid-size credit union with assets of approximately \$350 million, membership of approximately 37,000, and employees totaling only in the 50's, I must object to the proposal above as it is now worded and intended. While ECU strives to support diversity in not only its hiring practices but also in its relationships with third party vendors, I feel that the current proposal in no way supports the unique aspects of credit unions and their mission of maximizing their resources in making help available to as many as possible. Our credit union has on staff one employee for every 616 members it serves, and as it now stands, this proposal would place an incredible burden on us while we are struggling to keep up with the many, many mandates of other federal agencies, especially those of the CFPB.

Current NCUA regulations require us to perform due diligence on our third-party vendors, in particular their adherence to privacy and confidentiality. Adding the requirement that we be able to determine if they are a woman or minority owned company and then requiring that we assess their hiring practices would be monumental, if not impossible! How are we to know with any degree of certainty if a Wal-Mart, a Sam's Club, an AT&T or any of the other many vendors located hundreds and maybe thousands of miles away are complying with their own minority hiring guidelines? What about the vendors they do business with? Are we to verify their minority hiring practices also?

In regards to our own hiring practices, while we feel that our current policies protect diversity of employment, we can in no way support additional burdensome requirements of reporting that add no value to accomplishing the needs of our members, and it is somewhat disconcerting that the NCUA would support new proposals that significantly reduce our effectiveness in supporting the needs of our membership.

In summary, while ECU supports diversity in staffing decisions and certainly our vendors in accomplishing the same, we can in no way support additional burdensome regulations that take away from our ability to be competitive in offering the best products and services to our members.

Thank you for allowing me the opportunity to comment.

Sincerely,

Joe Hutyra, President/CEO

Educators Credit Union

Waco, Texas