

January 31, 2014

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

To Whom It May Concern:

I am the President of a small credit union struggling to keep up with the onslaught of regulations being handed down as a result of bad choices made by others. Our credit union, as well as other credit unions, is motivated by service to others, especially our members. A credit union's philosophy is generally grounded in service which inherently means doing the right thing for the right reason. We already employ that sense of fairness. Unfortunately, many times laws or regulations are created with good intentions, but result in unintended consequences. They sometimes burden the righteous while making the sinner look for an end-around.

Larger credit unions may have the employees or can hire more employees to administer and do the due-diligence without putting an undue burden on their finances; however, any expenditures toward this means taking money away that could better be used serving their members. Which do you think is more financially sound and just?

Small credit unions have much greater concerns. I can tell you, from the perspective of a small credit union manager, we have neither the staff nor the funds to hire additional staff to administer this. We already struggle to keep up with those things necessary to serve our members and protect their interests. Small credit unions with few employees such as mine, needs to be exempt from this. We sometimes have less competition for our business and our jobs due to the amount of money we can offer. We look for the best solutions or employees with the greatest benefit for our credit unions. If this passes, it makes the processes cumbersome and costly at best and impossible at worst.

When hiring, I personally don't care what someone looks like, how they worship, their gender or how old they are when I am looking for an employee. With limited employees, I have to find the best qualified and most capable. In small credit unions we don't have hundreds of people doing a job; we mostly have one person doing dozens of jobs. That being said, this does bring up one important question for me. If I hire one person over another just to satisfy a diversity requirement, isn't that a form of discrimination in and of itself; especially if they are not the better qualified?

I know we all make decisions based on our own experience and knowledge. If you haven't experienced managing a small credit union, I hope you will please take into consideration mine and others heartfelt concerns and make your decision based on our experience and perspective. I tried to keep this brief, but if you need more information or clarification from me, please feel free to contact me.

Thank you for reading my letter and allowing me to express my concerns.

A handwritten signature in black ink that reads "Barbara Ray". The signature is written in a cursive style with a large, looping initial "B" and a long, sweeping underline.

BARBARA RAY, President

Department of Public Safety Federal Credit Union