

From: [Craig Atkinson](#)
To: [Regulatory Comments](#)
Cc: [Suzanne Yashewski \(syashewski@cornerstoneleague.coop\)](#); [Craig Atkinson](#)
Subject: Diversity Regulation Comments
Date: Tuesday, February 04, 2014 11:11:01 AM
Attachments: [image002.png](#)

I am writing to voice my position on the proposed regulation regarding Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies

Houston Highway is a \$60 million credit union with a single location and 17 employees. Individually and corporately I am very mindful of diversity issues and prefer to have a workforce that is representative of the members that I serve. Additionally I am actively involved in the local chamber of commerce and actively try to support small local business whenever I can.

I worry that the proposal will lead to additional regulatory burden for small credit union employers. From a statistical standpoint given the extremely small workforce, statistical theory indicates we will be subjected to substantial volatility in a metrics which are monitored.

I worry that the vendor consideration could actually lead us to do LESS business with the small local business in an attempt to meet a regulatory definition of minimum standards. The result could easily be a change in focus to those MBE/WBE entities which are not always small in nature. The result of which, when aggregated could be very detrimental to our local economy and small employer specifically.

I request that the agency take steps to ensure small financial

institutions are not burdened by a one size fits all approach. This could easily be a significant burden to us, and the aggregated national impact be minimal to statistically negligible.

Respectfully,

Craig Atkinson

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