



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

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

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

Dear Mr. Polinquin,

Thank you for the opportunity to comment on the Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities.

While we appreciate the NCUA's continuing commitment to promote diversity in the workplace, we cannot support the proposed policy in its current form because of its "one size fits all" approach.

(1) Organizational Commitment to Diversity Inclusion

Since our charter date in 1962, DuGood Credit Union has enjoyed a long tradition of supporting diversity in the work place. We agree that credit unions should employ people of all races, gender, creed, and sexual orientation. However, we believe the proposed policy is unnecessary, duplicative, and will place an undue burden on other small rural credit unions.

As a credit union with 119 employees, we already comply with EEOC rules and requirements. We also have our own policies in place to promote affirmative action and inclusion.

On a broader scale, DuGood represents one of many credit unions that form a cooperative network in the state of Texas. Our state is vast, filled with several large cities, but many rural areas as well. Some Texas credit unions have as few as 5 employees or less. The proposed policy would greatly hinder these institutions, who are already struggling to meet increasing compliance burdens.

Federally insured by NCUA. 

Nederland
4008 N. Twin City Hwy.
Nederland, TX 77627

Beaumont
7505 Eastex Frwy.
Beaumont, TX 77708

Lumberton
695 N. Main St.
Lumberton, TX 77657

Port Neches
2501 Nall St.
Port Neches, TX 77651

Vidor
1430 N. Main St.
Vidor, TX 77662

Orange
3109 Edgar Brown Dr.
Orange, TX 77630

Jasper
1061 S. Wheeler
Jasper, TX 75951

Edison Plaza
350 Pine St.
Beaumont, TX 77701

(2) Procurement and Business Practices – Supplier Diversity

DuGood strongly objects to this requirement. It is perhaps the most troubling of the joint standards.

As not-for-profit cooperatives, it is absolutely imperative that credit unions be allowed the freedom to focus on cost efficiency and effectiveness when dealing with vendors. Even at \$236 million in assets, negotiating with contractors and suppliers is a challenge for our credit union. Such a requirement would likely result in missed opportunities and reduced service for our members. Furthermore, it would cripple small institutions that serve rural communities with less diverse populations.

Credit unions have no way of measuring diversity in their relationships with contractors and suppliers. We urge the Agencies to remove this category from the joint standards entirely.

(3) Practices to Promote Transparency of Organizational Diversity and Inclusion

As stated on the Careers page of our website, DuGood is truly proud to be an equal opportunity employer. However, we question the necessity of this requirement. Diversity is not truly promoted by the publication of activities on a website. Requiring a credit union to publicly disclose its diversity policies does not aid NCUA in its assessments.

Summary

In summary, DuGood Credit Union appreciates the NCUA's attempts to promote diversity among the credit union movement. Rather than taking the current course of action, however, we urge the NCUA to provide guidance through its Office of Minority and Women Inclusion. We also encourage the NCUA to consider minimizing the burdens on credit unions, so they can focus on their members. Thank you for considering our comments.

Sincerely,



Jada Kelley
President & CEO
DuGood Credit Union
jada.kaelley@dugood.org
(409) 923-1450