

February 6, 2014

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

RE: Comments on Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Regulated Entities

Dear Mr. Poliquin,

Thank you for your time in considering these comments in regards to the proposal concerning diversity policies and practices as they pertain to credit unions.

I am currently the CEO/President of a \$58 million credit union in west Texas. We have three locations in small rural towns with an average population of 12,000 in each community. We employ 39 full- and part-time employees to cover these locations.

When compiling our latest Disaster Recovery information, we had listed approximately 75 vendor/suppliers with whom we rely on for services from cleaning our buildings to performing appraisals for our mortgage program. Having to have three separate sets of these type vendors/suppliers due to the locations of our branches causes a list that is probably more extensive than most credit unions our size.

The proposal as written would cause WesTex Community Credit Union a great hardship. With limited staff and numerous vendors/suppliers, the compliance with this proposal would be very difficult and time consuming.

If the proposal also requires that the information we collect be made public, I am concerned of the damage it could possibly cause in our relationships with the small local businesses we use for supplies and services. Several who are member/owners of the credit union themselves.

I respectfully request that this proposal be reviewed with the unique aspects of member-owned credit unions kept in mind as well as the hardship it will cause credit unions with limited staff and resources.

Sincerely,

Devora Mitchell, CEO  
WesTex Community Credit Union  
200 E Austin  
Kermit, TX 79745

