

**From:** [Missy Morrow](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Suzanne Yashewski](#)  
**Subject:** Allyson Morrow Comments on Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Regulated Entities."  
**Date:** Thursday, February 06, 2014 5:29:28 PM

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February 6, 2014

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

Sent VIA E-mail: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

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

Dear Mr. Poliquin:

In response to the Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies of Regulated Entities, I submit the following comments regarding supplier diversity. We are located in deep South Texas and are considered to be a mid-sized credit union. We are already facing so many challenges in today's market. Economy of scale has not rewarded us at this size and Harlingen Area Teachers' Credit Union does not have the means to scale down our pool of available vendors due to this proposed policy. We are in a very competitive market and honestly for us, there are not that many vendors to choose from in the first place, simply because of our location. Most companies house out of Dallas or Houston and yes they are accessible by a plane trip, sometimes last minute travel for needs can be cost prohibitive, especially when it comes out of our budget.

Harlingen Area Teachers' Credit Union is a low-income designated financial institution that has a lot of members with very small balances. Anything that comes out of our budget has to be passed on to our members, due to very low interest rates on savings vehicles and also loans, simply to be competitive. We have a staff composed of 41 employees, the majority of which are Hispanic and female. We live diversity each and every day here in the Valley. This credit union has been in business for 60 years and has only had 3 CEO's – two of which have been female, one whose tenure lasted 35 years.

I am not in favor of anything that will put any more regulations on credit unions or those running them. Being female, I can certainly appreciate the need for diversity, in some areas, but I believe that whatever

company offers the best service for the price should be allowed to garner the job – no matter their sex, religion or racial ethnicity. As a CEO, we don't always choose a vendor based strictly on price, we review them as a whole. Honestly I don't care what race or sex they are and never even consider that when choosing a company to work with. I choose the company that will work best with us while meeting our needs.

To ask me or any other credit union our size to spend our time determining the diversity of anyone that we do business with is simply impossible. In addition to that, to ask me to have a policy concerning diversity is overstepping the intent of Dodd-Frank. Are you going to ask state and federal examiners to check for that policy and its accuracy? That just puts more work on them and in the grand scheme of things, isn't the issue of security and soundness much more important than the diversity of our workforce or the vendors that we choose.

When hiring, I choose the best individual for the position I am hiring for. To me to do otherwise would be some sort of discrimination. My job entails taking care of my members, educating them about financial services and helping them to make good sound decisions when it comes to their finances. Please I ask that you help us to minimize the regulatory burdens on credit unions so that I can spend my time doing my job.

Sincerely,

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