

**From:** [Pamela Stephens](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Proposed Interagency Policy Statement Establishing Joint Standard for Assessing the Diversity Policies and Practices of Regulated Entities  
**Date:** Thursday, February 06, 2014 4:00:17 PM

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This letter represents my views regarding the NCUA's proposal on diversity standards.

*Workplace Profile and Employment Practices*

Texas Trust Credit Union fully supports diversity in the workplace and has policies and procedures in place to codify action. Further, as an employer of over 275 individuals, TXTCU is already complying with the EEOC reporting obligations via a third party due to the complex nature of the requirements. I believe the criteria in the proposed standards can be helpful as examples to a credit union. However I object to requiring credit unions to develop policies and practices that expressly adhere to the very descriptive factors included in the proposal.

*Procurement and Business Practices – Supplier Diversity*

I strongly object to the requirement that credit unions assess diversity practices in their relationships with their suppliers and contractors. Such action is not mandated by the Dodd-Frank Act, and the burden to gather the data as proposed would be overwhelming as TXTCU works with over 150 vendors from small local firms to large global entities. During vendor selection, the emphasis should be on ability to deliver the product or service in an effective and cost-efficient manner. As stewards of our members' funds, we are obligated to do so!

*Practices to Promote Transparency of Organizational Diversity and Inclusion*

I feel that making public the information described in this proposed standard may be of little use, may confuse the public and could be misinterpreted to our detriment.

I urge you to give more consideration to this proposal.

Sincerely,

**Pamela Stephens**

Executive Vice President and Chief Strategic Officer

817.273.5905 (direct)

817.455.1530 (cell)

972.595.1295 (Fax)

[pstephens@texastrustcu.org](mailto:pstephens@texastrustcu.org)

TexasTrustCU.org

