



**"We Do The Most For You"**

**Lone Star**

PO Box 1480  
Lone Star, TX 75668  
(903) 656-2576

February 6, 2014

**Daingerfield**

1206 Linda Drive  
Daingerfield, TX 75638  
(903) 645-2206

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

**Real Estate Office**

109 Lamar Street  
Daingerfield, TX 75638  
(903) 645-7930

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

Dear Mr. Poliquin:

**Jefferson**

302 E. Broadway  
Jefferson, TX 75657  
(903) 665-8998

On behalf of the management and Board of North East Texas Credit Union, I would like to take this opportunity to comment in response to the proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities.

**Mt. Pleasant**

1405 South Jefferson Ave.  
Mt. Pleasant, TX 75455  
(903) 577-3500

North East Texas Credit Union strongly supports diversity in the workplace and remains committed to providing a work environment where every person regardless of race, gender, ethnicity or sexual orientation has an equal opportunity to succeed. However, we have serious reservations about the joint standards as currently proposed. We cannot support the proposal as drafted due to its "one size fits all" approach.

**Diana**

PO Box 5  
Diana, TX 75640  
(903) 663-6200

While we recognize that the proposed policy statement is in response to a requirement set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, it is our view that the joint standards prescribed in this proposed policy statement go much too far, require duplicated efforts for most regulated entities and will unquestionably result in additional compliance costs and will do very little to achieve greater diversity. We ask NCUA to develop standards in a manner that will minimize the information gathering and reporting burden on credit unions.

**Hughes Springs**

PO Box 159  
Hughes Springs, TX 75656  
(903) 639-4115

North East Texas Credit Union strongly objects to the requirement that credit unions assess diversity practices in their relationships with their suppliers and contractors. The Dodd-Frank Act does not mandate that the agencies develop standards relating to assessing diversity of contractor and supplier relationships. Therefore, we request that NCUA exclude data relating to contractor and supplier relationships from any assessment standards.

[www.TheNetCU.com](http://www.TheNetCU.com)



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Larger entities subject to EEOC reporting requirements currently provide data and supporting documentation and likely already have a diversity policy in place. However, there is no legal requirement that smaller entities with fewer than 100 employees maintain a diversity policy or report information under EEOC rules. Therefore, we ask NCUA to finalize diversity standards that are in line with EEOC reporting requirements, thereby exempting credit unions with fewer than 100 employees from any section 342 assessments.

We have no objection of making it publicly known that North East Texas Credit Union is committed to diversity and inclusion. We believe this can be accomplished and addressed in a broad diversity and inclusion policy. We question the necessity of including specific details of efforts and activities taken by the regulated entity to bring diversity about.

In summary, we do not see the need for the joint standards and would rather see NCUA provide guidance while at the same time minimizing the burdens on credit unions so that we can focus on serving our members. Thank you for considering our comments. If you have any questions, please call me at 903-656-2576.

Sincerely,

Melinda Welch, PHR  
Human Resource Manager  
North East Texas Credit Union  
[mwelch@thenetcu.com](mailto:mwelch@thenetcu.com)

903-656-2576