

From: [Tim Adams](#)
To: [Regulatory Comments](#)
Cc: syashewski@cornerstoneleague.coop
Subject: Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies and Request for Comment
Date: Friday, February 07, 2014 12:40:04 PM

Mr. Gerard Poliquin
Secretary of the Board
NCUA

Dear Mr. Poliquin:

I am writing to express my reservations concerning the Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies. As the President/CEO of a \$38 million asset credit union in Houston, Texas the joint standards as they are currently proposed would place an onerous burden on the operational and compliance capabilities of this credit union. SPCO Credit Union supports diversity in theory and in practice by having an extremely diverse workforce and membership.

While the joint standards would seem to provide relief from the more onerous provisions as proposed by using the “manner reflective of the individual entity’s size and other characteristics” language, the potential for subjective application and interpretation of this provision certainly concerns me. Requirements for “Supplier Diversity” would be difficult at best if not impossible for an organization of our size. The credit union currently has ten (10) full-time employees that possess neither the experience or skills needed to fully meet the necessary basic requirements proposed in the joint standards. While the proposed joint standards state “the Agencies will not use the examination or supervision process in connection with these standards,” I am concerned that this could ‘bleed’ into any examinations of our third-party due diligence.

For these simple reasons, I would urge you to not adopt the proposed joint standards.

Regards,

Tim Adams
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