



February 7, 2014

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

Dear Mr. Poliquin:

This letter is in reference to NCUA's proposal on diversity standards. Texas Health Resources Credit Union is very diverse, as is our membership. It goes without saying that America is a country of diversity as is the credit union industry. While we do not have specific policies, we do have practices that support diversity.

As a small credit union, we do not have resources to build and monitor every aspect of the request. Each and every new requirement is written as though there are unlimited human resources to handle these new requirements. This is simply not the case. The credit unions are stretched to the max to simply try to keep up with regulations and monitor fraud issues.

Supplier Diversity is of particular concern since many of our suppliers are local stores (Office Depot or wholesalers like Walmart and Costco) or vendors that are devoted to credit unions and therefore know our products and needs and provide pricing that is affordable and would not be, if purchased from a large house that catered to corporations.

This credit union has a management relationship with our sponsor for HR services. That entity does report to governmental agencies such data and if the credit is required to report, there would be duplication of information.

Requiring a credit union to disclose (publicly) its diversity policy is not an issue of assessing the financial safety or stability of the institution. Further, small credit unions simply should be exempt from over burdening regulations and fact gathering that is meaningless to the process. Additionally, many of the smaller credit unions are even more diverse. Just for the record, Texas Health Resources Credit Union is by employee:

41.2%	Hispanic
47.1%	Anglo
11.8%	Black

Please consider ways to minimize regulatory burden without compromising your responsibility as a regulatory body. This proposed policy reaches beyond the intent of the “Dodd Frank Act”.

Respectfully submitted,

Z. Suzanne Chism, CCUE
President/CEO

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