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February 7, 2014

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

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

Dear Mr. Poliquin:

On behalf of the management and Board of Members Choice Credit Union (MCCU), we would like to take this opportunity to comment on the proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities.

MCCU has always supported diversity in the workplace and will remain 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 cannot support this proposal as written due to its treating of all credit unions the same regardless of size, employees or location.

Organizational Commitment to Diversity and Inclusion

In addition to the comments above, MCCU believes it is a good practice to take proactive steps to ensure diversity in the workplace. We have no objection to the requirement of having a board approved policy intended to promote greater diversity and inclusion in the workplace. However, requiring MCCU to designate a Chief Diversity Officer seems unnecessary. This should be a decision for the board and management of MCCU.

Workforce Profile and Employment Practices

The joint standards proposed in this section of the policy statement are repetitive of regulatory and statutory requirements already in place for many credit unions. This could be easily addressed in a broad diversification and inclusion policy approved by the board, as discussed above. MCCU is an equal opportunity employer; it would appear the proposed joint standards are unnecessary.

Procurement and Business Practices - Supplier Diversity

MCCU objects to the requirement we assess diversity practices in our relationships with our suppliers and contractors. The proposed standards will impose undue hardship which could result in the restriction of fair and open competition. In certain situations implementation of the proposed standards could make it difficult to hire

or engage the most qualified firm or supplier. In short, MCCU should be able to shop for the most competitive pricing for qualified outside suppliers and services without adding another unnecessary layer of subjective analysis to promote diversity. Absent the presence of a significant safety and soundness issue, MCCU can see no reason why a regulator should be involved in the day to day purchasing decisions of a credit union.

Practices to Promote Transparency of Organizational Diversity and Inclusion

MCCU opposes this standard. Publicly disclosing our diversity policies will not aid NCUA in its assessments.

In conclusion, MCCU fails to see the need for the joint standards and recommends each regulated entity be required to simply have a board approved policy demonstrating the entity's commitment to diversity and inclusion based on its size and structure. Then allow existing anti-discrimination statutes and regulations ensure this commitment is real and not being abused.

Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in black ink that reads "Steve Gilman". The signature is written in a cursive style with a long, sweeping tail on the "n".

Steve Gilman
President / CEO