

**From:** [Dana Sisk](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Dana Sisk](#)  
**Subject:** Navy Army Community CU Comments on Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities  
**Date:** Friday, February 07, 2014 12:48:10 PM

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Navy Army Community Credit Union (NACCU) has concerns about these proposed policy statements, and the burden and risk such policy statements might create for our credit union.

We have serious concerns with the proposed standard that would require regulated entities to assess diversity practices in their relationships with suppliers and contractors. NACCU operates in South Texas, where our field of membership is over 60% Hispanic. By virtue of our support of local vendors for building construction, maintenance, supplies purchases, and MANY other services, we already support diversity in vendor relations.

In fact, requirements to measure diversity could adversely affect local minority vendors due to the lack of information for measuring diversity. We have serious concerns that such standards might eventually require that we abandon long-term, trusted, local vendors for the sake of complying. And – let's not forget that as a not-for-profit entity, we must stress effectiveness and cost-efficiency in our vendor relationships above and beyond other considerations.

We believe diversity-related assessments could lead to additional and unnecessary burdens for NACCU, and could create compliance risk that is not relevant to the safety and soundness of our operations.

Thank you for your consideration,

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