

February 4, 2014

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

Sent via E-mail to: regcomments@ncua.gov

Dear Mr. Poliquin:

This letter represents the views of Texas People Federal Credit Union regarding the NCUA's proposal on diversity standards. Texas People FCU is a 22 Million dollar credit union. This proposal on diversity Standards could cause more work for a credit union our size and smaller. As a small credit union we are already struggling to keep up with all the compliance issues and keep the examiners happy when they visit our shops.

Texas People FCU supports diversity. As a small credit union we have policies and procedures in place consistence with the intent of the proposal. We cannot support the proposal as drafted due to its "one size fits all" approach.

Drafted as a joint proposal for all financial institutions, the proposal does not take into consideration the unique nature of credit unions. Instead of joint standards for all we respectfully request standards appropriate for the unique nature of credit unions be established through NCUA's Office of Minority and Women Inclusion Office ["OMWI Office"]

Procurement and Business Practices- Supplier Diversity

Texas People FCU 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 any 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.

As a small credit union it would be very difficult to measure diversity in our relationship with contractors and suppliers. As a small credit union we simply do not have the staff or resources to comply with this aspect of the proposal. As a small credit union we must stress effectiveness and cost efficiency in the suppliers and contractors we hire.

Workplace Profile and Employment Practices

We believe the criteria included in the proposed standards can be helpful as examples of how a credit union can express its commitment to diversity and inclusion. We object to requiring that credit unions develop policies and practices that expressly adhere to the very descriptive factors included in the proposal.

Practices to Promote Transparency of Organizational Diversity and Inclusion

Texas People FCU opposes this standard. Requiring a credit union to publicly disclose its diversity policies does not aid NCUA in it assessments.

Summary

Texas People FCU urges NCUA to provide guidance through its OMWI office, while at the same time minimizing the burdens on credit unions so that they can focus on serving their membership. Thank you for considering the comments of Texas People FCU.

Carolyn Smithwick
President
Texas People FCU