

From: [Dana Warne](#)
To: [Regulatory Comments](#)
Subject: Dana Warne Comments on Proposed
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Dana Warne Comments on Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Regulated Entities.

I am the CEO of a small credit union, roughly sixteen million in assets. We have 5 employees, 2 black, 4 women (one of whom is American Indian). Our nine member board of directors includes 2 black and 4 women. We definitely do endeavor to ensure that our board of directors and our staff reflect the makeup of our employee group and our community (although we are not open to the rest of the community).

To date, we have not written a policy requiring that we be diverse, partly because it is difficult enough to find qualified applicants for any openings. It would be very difficult to not be able to hire a replacement for a terminated employee because they did not fall in to a certain category.

In addition, with our small size and limited personnel resources, it would be impossible for us to monitor the diversity of every company with which we do business. We do not have, nor could we possibly afford a full-time employee to monitor and ensure compliance with all compliance issues.

I certainly have no issue with requiring large credit unions, some of which have more than 100 employees with multiple levels of management, to ensure they represent their membership base. But small credit unions do not have the resources at their disposal.

When this policy becomes a requirement, perhaps small credit unions (maybe under \$100,000,000.00 in assets) could be exempted.

Sincerely,

Dana Warne
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