

February 7, 2014

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

Re: Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies and Request for Comment

Dear Mr. Poliquin,

We at Oklahoma Central Credit Union (OCCU) understand and support diversification and feel that Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 have good intentions, but we have serious concerns regarding the following joint standards.

- *Organizational Commitment to Diversity and Inclusion/Workforce Profile and Employment Practices*

There are already regulations in place to support diversification and inclusion in the workplace such as the Equal Employment Opportunity Commission (EEOC) and Affirmative Action. This proposal would place additional burdens and resources on credit unions. There is no need for additional regulations, especially since this is a self-assessment. As stated in the proposal: "Agencies will not use the examination or supervision process in connection with these proposed standards."

- *Procurement and Business Practices – Supplier Diversity*

This proposal is very disconcerting. Credit unions already perform extensive due diligence on current and potential vendors to ensure our safety and soundness. It should not be our responsibility to measure the diversity of our vendors/suppliers.

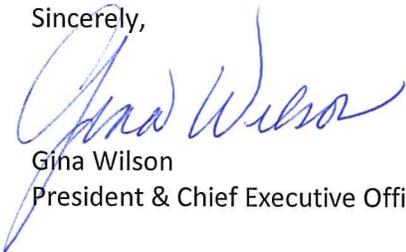
- *Practices To Promote Transparency of Organizational Diversity and Inclusion*

This is another proposal that concerns us greatly at Oklahoma Central Credit Union. Publicly posting diversity and inclusion policies and practices could easily lead to misunderstanding and unintentional exclusion of other demographics. We ask that the standard to promote transparency of organizational diversity and inclusion be excluded.

To reiterate, we at OCCU understand the intent of these joint standards. However, this proposal is far too burdensome and has the potential to create confusion and considerable misunderstanding for staff, members, business partners and the public. We do not believe the desired outcome can be achieved with the current proposals.

Thank you for the opportunity to comment and share our concerns regarding this issue. If you have any questions or would like to discuss this further, please contact me at (918) 664-6000 extension 245.

Sincerely,



Gina Wilson
President & Chief Executive Officer