

From: [Brian Waugaman](#)
To: [Regulatory Comments](#)
Subject: Changes to Standard Credit Union Bylaws
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Attachments: [image002.png](#)

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In response to a recent NCUA CU Express Notification-NCUA Board Seeks Comments on Possible Credit Union Bylaws Changes, I would like to submit the following comments on how the NCUA Board could improve the bylaws to facilitate the recruitment and development of directors.

1. Each credit union Board should submit a formalized, Board approved plan addressing the recruitment and ongoing development of its Board of Directors. In some cases, a formalized plan is non-existent and/or unavailable to reference for proper Board development. If Board has overall responsibility for the financial stability of a credit union, this same Board should be required to provide a documented plan outlining the future development and training requirements for the credit union's Board of Directors.
2. All Boards should be required to provide a formalized Board Member Evaluation Program requiring all individual Board members, at least annually, to review the performance of all respective Board members documenting each Board members ability to provide proper credit union oversight in respect to overall membership and support of credit union strategic initiatives. As credit unions continue to expand beyond their original charters, it becomes increasingly more important that Board members evolve to allow for proper representative of current membership base. Formally documenting each Board members abilities to properly oversee and represent the membership as a whole as seen by their peers would assist to ensure all members of the Board remain engaged.
3. Finally, the above referenced Board Evaluation Program should be supplemented by providing performance grade levels necessary in order for director to maintain place on the Board.

Thank you for your consideration,



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Brian J. Waugaman, CCE

Chief Executive Officer

Erie Federal Credit Union

Corporate Office • 3503 Peach Street • Erie, PA 16508-2741

Phone: (814) 825-2436

Fax: (814) 897-2363

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