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May 17, 2018

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

RE: RIN 3133-AE86

Dear Mr. Poliquin,

On behalf of Credit Human Federal Credit Union I'm writing in response to the Advanced Notice of Proposed Rulemaking (ANPR) regarding the Standard Federal Credit Union Bylaws posted on March 21, 2018. Credit Human appreciates the opportunity to provide comment on ways to streamline, clarify, and improve the Federal Credit Union (FCU) standard bylaws. The following comments address two of the five topics noted in the ANPR which we believe could help improve the FCU standard bylaws.

How can the Board improve the FCU bylaws amendment process?

As stated in the ANPR, a federal credit union's decision to amend its bylaws is usually in response to an operational concern; therefore, it is imperative the approval of the revised bylaws are conducted in a timely and efficient manner. Credit Human suggests the following:

- NCUA provide a letter or receipt to the credit union submitting revisions to their bylaws with a timeline as to when the bylaws may be approved;
- NCUA attempt to approve the bylaws within a fifteen day timeframe; if the approval process requires more time, the NCUA provide notice to the credit union.

How can the Board improve the FCU bylaws to facilitate the recruitment and development of directors?

Credit Human does not believe changes are required to the bylaws to improve the process of recruitment and development of directors, nor do we believe that a set criteria for recruitment be established by the NCUA, as each credit union should establish criteria for recruitment based on

the needs of the credit union. We suggest the NCUA offer credit unions guidelines of best practices used by credit unions industry wide for the recruitment of Volunteers. For example, Credit Human has established a group of "Associate Directors" who have been vetted through a nomination process and assigned as non-voting Volunteers training to transition to the Supervisory Committee or Board of Directors as positions become available.

Thank you for your efforts to streamline, clarify, and improve the standard FCU bylaws. Credit Human appreciates the opportunity to comment on this ANPR; we hope that you find our suggestions for improvement useful. Should you have any questions or concerns, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Yvonne De La Rosa".

Yvonne De La Rosa
Regulatory & Legislative Affairs Officer