



3138 10th Street North
Arlington, VA 22201-2149
703.522.4770 | 800.336.4644
f: 703.524.1082
nafcu@nafcu.org | nafcu.org

National Association of Federally-Insured Credit Unions

May 21, 2018

Gerard Poliquin
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

RE: Proposed Suspension and Debarment Procedures (Docket No. 2018-05626)

Dear Mr. Poliquin:

On behalf of the National Association of Federally-Insured Credit Unions (NAFCU), the only national trade association focusing exclusively on federal issues affecting the nation's federally-insured credit unions, I am writing in response to the National Credit Union Administration's (NCUA) proposed suspension and debarment procedures.

NAFCU supports the NCUA's proposed suspension and debarment procedures, which are designed to ensure that government contracts are awarded to responsible and ethical contractors. The adoption of such procedures aligns with the NCUA Office of Inspector General's (OIG) recommendation that the agency adopt appropriate procurement related controls. Most importantly, NAFCU believes that these procedures will better protect the agency against the risk of non-performance on future contracts.

NAFCU also appreciates the proposal's emphasis on achieving transparency and satisfying due process requirements. However, NAFCU does not think that suspension and debarment procedures should limit the NCUA's authority to act effectively as conservator or liquidating agent in the event of a credit union failure. With respect to the acquisition of legal services, the agency should consult with the OIG regarding whether such procedures would be of benefit to the NCUA Office of General Counsel.

NAFCU appreciates the opportunity to provide comments on the proposed suspension and debarment procedures. If you have any questions or concerns, please do not hesitate to contact me at amorris@nafcu.org or (703) 842-2266.

Sincerely,

Andrew Morris
Regulatory Affairs Counsel