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May 9, 2018

Gerald Poliquin
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
Via email to: regcomments@ncua.gov

Re: Proposed Suspension and Debarment Procedures

Dear Mr. Poliquin:

The Credit Union National Association (CUNA) appreciates the opportunity to submit comments concerning the National Credit Union Administration's (NCUA) proposed suspension and debarment procedures. CUNA represents America's credit unions and their 110 million members.

CUNA supports NCUA taking administrative action to address due process in the agency's procurement processes, which would bring the agency in line with standard federal guidelines. CUNA agrees with the agency that for the purposes of a liquidation or conservatorship of an undercapitalized or failing credit union, suspension and debarment procedures need not be applied to legal services contracts, whether provided on behalf of NCUA as an agency or the NCUA Board as conservator or liquidating agent. CUNA does not believe that the proposed rule regarding suspension and debarment processes should materially restrict the Board's statutory contracting rights as conservator or liquidating agent. The proposal also provides contractors with an option for judicial review, which we believe provides sufficient remedy. CUNA has no concerns with the rule as proposed.

Thank you for the opportunity to provide comments on the proposed suspension and debarment procedures. Should you have any questions about CUNA's comments, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Monique Michel".

Monique Michel
Senior Director, Advocacy & Counsel