

May 21, 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:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the National Credit Union Administration's (NCUA) proposed suspension and debarment procedures.

HCUA supports NCUA taking action to bring the agency in line with standard federal guidelines as it pertains to due process in the agency's procurement process. Our organization also supports the proposed rule regarding the suspension and debarment procedures not being applied to legal services contracts of a liquidation or conservatorship of an undercapitalized or failing credit union.

As HCUA agrees with the NCUA updating and modernizing its procurement processes, HCUA does not believe in the restriction on Board's statutory contracting rights regarding suspension and debarment processes as conservator or liquidating agent.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas
President/CEO