



July 15, 2011

VIA E-MAIL TRANSMISSION
www.regulations.gov

Stephen Llewellyn, Executive Officer
Executive Secretariat
Equal Employee Opportunity Commission
131 M Street, NE, Suite 6NE03F
Washington, DC 20507

RE: ***Proposed Rulemaking Regarding Recordkeeping and Reporting Requirements under Title VII, the ADA and GINA RIN 3046-AA89***

Dear Mr. Llewellyn:

We appreciate the opportunity to respond on behalf of our member credit unions to the rules proposed by the Equal Employment Opportunity Commission regarding the recordkeeping and reporting requirements for the implementation of the Genetic Information Nondiscrimination Act of 2008 (“GINA”). The Illinois Credit Union League represents over 400 credit unions operating in Illinois.

As proposed, we support the recordkeeping responsibilities as the record retention responsibilities for GINA mirrors that of Title VII and the ADA. Consistency among recordkeeping responsibilities ensures appropriate record retention.

We appreciate the opportunity to provide our input to the EEOC regarding recordkeeping and reporting requirements. Please feel free to contact me if you have any questions.

Very truly yours,

ILLINOIS CREDIT UNION LEAGUE

By: _____
Lynn W. Esp
Assistant General Counsel

LWE:ko

cc: Regulatory Committee
Legislative Committee
Don Edwards

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