

United States House of Representatives  
Committee on Financial Services  
2129 Rayburn House Office Building  
Washington, D.C. 20515

June 5, 2019

[REDACTED]

The 2008 financial crisis, in particular, revealed the depth of the problems in the financial services industry, including a lack of diversity in the industry's workforce and business activities. In response to this concern, Section 342 of the Dodd Frank Wall Street Reform and Consumer Protection Act created 20 Offices of Minority and Women Inclusion (OMWI) in the nation's most powerful financial regulatory agencies, to be responsible for all matters relating to diversity in regulated agencies' management, employment, and business activities.<sup>1</sup> Section 342(b)(2)(C) of the Dodd-Frank Act also required the OMWI Director of each agency to develop standards for assessing the diversity policies and practices of entities regulated by the agency. The Final Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity and Policies and Practices of Entities Regulated (Joint Standards) was adopted in June 2015 by the lead prudential banking and consumer finance regulatory agencies to implement this requirement.<sup>2</sup>

Unfortunately, a complete picture of diversity and inclusion in the financial services industry cannot be obtained until the financial services industry shares their diversity data and policies with the OMWIs, Congress, and the public. Under the Joint Standards, regulated entities were encouraged, but not required, to share diversity data and policies with the OMWI offices. Without access to this data, it is not fully possible to gauge whether regulated entities are meeting the spirit and intention of Section 342.

To best examine this concern about [REDACTED] implementation of diversity and inclusion initiatives, please provide the following about your institution's diversity and inclusion data and policies from 2015 through present, including:<sup>3</sup>

1. Demographic totals on your employees, including:
  - a. Total number of employees (full- and part-time)
  - b. Career level of employees (executive and manager versus employees in other roles);
  - c. Gender, race and ethnic identity of your employees, as otherwise known or provided voluntarily;
  - d. Employee compensation by gender, race and ethnicity;
2. Number and dollar value invested with minority- and women-owned vendors and asset managers as compared to all vendor and asset manager investments, as applicable;

<sup>1</sup> Pub. L. No. 111-203 (2010).

<sup>2</sup> Office of the Comptroller of the Currency, Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, National Credit Union Administration, Bureau of Consumer Financial Protection and Securities and Exchange Commission; Final Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Securities and Exchange Commission; OCC-2013-0014, OP-1465 and Release No. 34-75050 File No. S7-10-15 (June 2015).

<sup>3</sup> If your institution is a member of and participated in diversity surveys conducted by the Securities Industry and Financial Markets Association, you may have previously provided similar diversity statistics and information to that trade association. If so, that data may be provided as a response, in part, to this data request.

- a. Amount and percentage of company 401K plan and other pension plan assets invested with diverse-owned asset management firms and categorize each firm by gender and racial ownership type (i.e. women, African-American, Latino etc.)
  - b. Amount and percentage of externally-managed wealth management platform assets invested with diverse-owned asset management firms and categorize each firm by gender and racial ownership type (i.e. women, African-American, Latino etc.)
  - c. Amount and percentage of investments managed by diverse owned banks and underwriters and categorize each firm by gender and racial ownership type (i.e. women, African-American, Latino etc.)
3. Title(s) and reporting structure for your institution's lead diversity officer(s);
    - a. Number of staff and budget dedicated to diversity initiatives;
  4. Description of performance measures and compensation tied to diversity initiatives;
  5. Company-wide diversity policies and practices, including:
    - a. Recruitment strategies;
    - b. Outreach to diverse organizations, such as historically black colleges and universities and professional organizations;
    - c. Gender pay equity data and efforts to close any identified gaps;
  6. Corporate board demographic data, including:
    - a. Total number of board members;
    - b. Gender, race and ethnic identity of board members, as otherwise known or provided voluntarily;
    - c. Board position title, as well as any leadership and subcommittee assignments;
  7. Your institution's diversity policies and practices; and
  8. Any challenges your institution faces in implementing its diversity goals and initiatives.

We expect your institution to give this matter the full and necessary attention required to complete this request. To that end, we ask for your written response by June 28, 2019. You may contact committee staff [REDACTED] at (202) 225-4247 with any questions regarding this request.

Sincerely,



The Honorable Maxine Waters  
Chairwoman  
Committee on Financial Services



The Honorable Joyce Beatty  
Chair  
Committee on Financial Services  
Subcommittee on Diversity  
and Inclusion

CC: The Honorable Patrick McHenry  
Ranking Member, Committee on Financial Services

The Honorable Ann Wagner  
Ranking Member, Subcommittee on Diversity and Inclusion