



# Voluntary Diversity Self-Assessment of Financial Institutions Regulated by the Bureau of Consumer Financial Protection

## **Paperwork Reduction Act Statement**

Public reporting burden for this collection is estimated to average 8 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Paperwork Reduction Act, Legal Division, Bureau of Consumer Financial Protection, 1700 G Street NW, Washington, DC 20552. Respondents need not respond to this request for information unless it displays a currently valid OMB Control Number. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The Control Number for this collection is 3170-0060 and it expires 08/31/2022.

## **Privacy Act Statement**

5 U.S.C. 552a(e)(3)

The information that you provide may be used by the Consumer Financial Protection Bureau (Bureau) to monitor progress and trends in the financial services industry with regard to diversity and inclusion in employment and contracting activities and to identify and highlight those policies and practices that have been successful.

Personally identifiable information (PII) such as name, email, and phone number is collected from individuals that submit the survey on behalf of their entity.

Information collected will be treated in accordance with the System of Records Notice (“SORN”), CFPB.0013 External Contact Database, 77 FR 2689. The Bureau may publish information disclosed by the entity, such as any identified leading practices, in any form that does not identify a particular entity or individual or disclose confidential business information.

The collection of this information is authorized by Public Law No. 111-203, Title III, Section 342 codified at 12 U.S.C. 5452.

Participation in this survey is voluntary.

## Organization information

The Bureau of Consumer Financial Protection (Bureau) provides this self-assessment instrument in support of the Interagency Policy Statement Establishing Joint Standards for Assessing Diversity Policies and Practices of Regulated Entities dated June 10, 2015. Pursuant to the Policy Statement, a self-assessment is voluntary. However, financial institutions conducting self-assessments of their diversity policies and practices against the Standards contained in the Policy Statement may use this instrument or their own assessment tool.

**Please provide information about your organization.**

NAME OF ENTITY

STREET

CITY

STATE

ZIP CODE

PERIOD COVERED BY ASSESSMENT

DATE SUBMITTED

**Please list diversity and inclusion officer or equivalent:**

FULL NAME OF POINT OF CONTACT FOR ENTITY

POSITION TITLE

WORK PHONE

 -  - 

EMAIL

FAX NUMBER

 -  -

**Organization information cont.**

**Please list the supplier diversity and inclusion officer or equivalent (if different from D&I Officer):**

FULL NAME OF POINT OF CONTACT FOR ENTITY

POSITION TITLE

WORK PHONE

 -  - 

EMAIL

FAX NUMBER

 -  - 

**Please list your company's diversity and inclusion website URL:**

COMPANY'S WEBSITE OR URL

**Please briefly include a description of the Financial Institution Covered by this Assessment (e.g., governance structure, workforce size, total assets, geographic location(s), and community characteristics).**

## Organizational Commitment to Diversity and Inclusion

The leadership of an organization with successful diversity policies and practices demonstrates its commitment to diversity and inclusion. Leadership comes from the governing body, such as a board of directors, as well as senior officials and those managing the organization on a day-to-day basis. These Standards inform how an entity promotes diversity and inclusion in both employment and contracting and how it fosters a corporate culture that embraces diversity and inclusion.

| POLICY & PRACTICES STANDARDS  | YES | NO | Activities that Support Program Success or Program Challenges |
|---|-----|----|---|
| <p>In a manner reflective of the individual entity's size and other characteristics:</p> <p>The entity includes diversity and inclusion considerations in both employment and contracting as an important part of its strategic plan for recruiting and hiring, as well as for promotion and retention.</p> |     |    |   |
| <p>The entity has a diversity and inclusion policy that is approved and supported by senior leadership, including senior management and the board of directors.</p>   |     |    |   |
| <p>The entity provides regular progress reports to the board and senior management.</p>   |     |    |   |
| <p>The entity regularly conducts training and provides educational opportunities on equal employment opportunity and on diversity and inclusion.</p>  |     |    |   |
| <p>The entity has a senior-level official, preferably with knowledge of and experience in diversity and inclusion policies and practices, who oversees and directs the entity's diversity and inclusion efforts.</p>  |     |    |   |
| <p>The entity takes proactive steps to promote a diverse pool of candidates, including women and minorities, in its recruiting, hiring, promotion, and retention efforts, as well as in its selection of board members, senior management, and other senior leadership positions.</p>                       |     |    |   |

## Workforce Profile and Employment Practices

Many entities promote the fair inclusion of minorities and women in their workforce by publicizing employment opportunities, creating relationships with minority and women professional organizations and educational institutions, creating a culture that values the contribution of all employees, and encouraging a focus on these objectives when evaluating the performance of managers. Entities with successful diversity and inclusion programs also regularly evaluate their programs and identify areas to be improved.

| POLICY & PRACTICES STANDARDS   | YES | NO | Activities that Support Program Success or Program Challenges |
|--|-----|----|---|
| In a manner reflective of the individual entity's size and other characteristics:<br><br>The entity implements policies and practices related to workforce diversity and inclusion in a manner that complies with all applicable laws. |     |    |   |
| The entity ensures equal employment opportunities for all employees and applicants for employment and does not engage in unlawful employment discrimination based on gender, race, or ethnicity.                                       |     |    |   |

| POLICY & PRACTICES STANDARDS  | YES | NO | Activities that Support Program Success or Program Challenges |
|---|-----|----|---|
| The entity has policies and practices that create diverse applicant pools for both internal and external opportunities that may include:<br><br>Outreach to minority and women organizations. |     |    |   |
| Outreach to educational institutions serving significant minority and women student populations.  |     |    |   |
| Participation in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities.                                       |     |    |   |

**Workforce Profile and Employment Practice cont.**

| <p><b>POLICY &amp; PRACTICES STANDARDS</b></p> <p>In a manner reflective of the individual entity's size and other characteristics:</p>  | <p><b>YES</b></p> | <p><b>NO</b></p> | <p><b>Activities that Support Program Success or Program Challenges</b></p> |
|--|-------------------|------------------|---|
| <p>The entity utilizes both quantitative and qualitative measurements to assess its workforce diversity and inclusion efforts. These efforts may be reflected, for example, in applicant tracking, hiring, promotions, separations (voluntary and involuntary), career development, and retention across all levels and occupations of the entity, including the executive and managerial ranks.</p> |                   |                  |   |
| <p>The entity holds management at all levels accountable for diversity and inclusion efforts, for example, by ensuring that such efforts align with business strategies and individual performance plans.</p>  |                   |                  |   |

## Procurement and Business Practices—Supplier Diversity

Companies increasingly understand the competitive advantage of having a broad selection of available suppliers to choose from with respect to factors such as price, quality, attention to detail, and future relationship-building. A number of entities have achieved success at expanding available business options by increasing outreach to minority-owned and women-owned businesses. As in the employment context, entities often use metrics to identify the baseline of how much they spend procuring and contracting for goods and services, how much they spend with minority-owned and women-owned businesses, and the availability of relevant minority-owned and women-owned businesses, as well as changes over time. Similarly, entities may use outreach to inform minority-owned and women-owned businesses (and affinity groups representing these constituencies) of these opportunities and of the procurement process. In addition, entities’ prime contractors often use subcontractors to fulfill the obligations of various contracts. The use of minority-owned and women-owned businesses as subcontractors provides valuable opportunities for both the minority-owned and women-owned businesses and the prime contractor. Entities may encourage the use of minority-owned and women-owned subcontractors by incorporating this objective into their business contracts.

| POLICY & PRACTICES STANDARDS  | YES | NO | Activities that Support Program Success or Program Challenges |
|---|-----|----|---|
| <p>In a manner reflective of the individual entity’s size and other characteristics:</p> <p>The entity has a supplier diversity policy that provides for a fair opportunity for minority-owned and women-owned businesses to compete for procurement of business goods and services. This includes contracts of all types, including contracts for the issuance or guarantee of any debt, equity, or security, the sale of assets, the management of the entity’s assets, and the development of the entity’s equity investments.</p> |     |    |   |

| <b>POLICY &amp; PRACTICES STANDARDS</b>   | <b>YES</b> | <b>NO</b> | <b>Activities that Support Program Success or Program Challenges</b> |
|---|------------|-----------|--|
| The entity has methods to evaluate its supplier diversity, which may include metrics and analytics related to:      |            |           |  |
| Annual procurement spending.  |            |           |  |
| Percentage of contract dollars awarded to minority-owned and women-owned businesses by race, ethnicity, and gender. |            |           |  |
| Percentage of contracts with minority-owned and women-owned business subcontractors.                                |            |           |  |

| <b>POLICY &amp; PRACTICES STANDARDS</b>   | <b>YES</b> | <b>NO</b> | <b>Activities that Support Program Success or Program Challenges</b> |
|---|------------|-----------|--|
| The entity has practices to promote a diverse supplier pool, which may include:   |            |           |  |
| Outreach to minority-owned and women-owned contractors and representative organizations.  |            |           |  |
| Participation in conferences, workshops, and other events to attract minority-owned and women-owned firms and inform them of contracting opportunities. |            |           |  |
| An ongoing process to publicize its procurement opportunities.  |            |           |  |



## Practices to Promote Transparency of Organizational Diversity and Inclusion

Transparency and publicity are important aspects of assessing diversity policies and practices. Greater awareness and transparency give the public information to assess those policies and practices. Entities publicize information about their diversity and inclusion efforts through normal business methods, which include displaying information on their websites, in their promotional materials, and in their annual reports to shareholders, if applicable. By making public an entity’s commitment to diversity and inclusion, its plans for achieving diversity and inclusion, and the metrics it uses to measure success in both workplace and supplier diversity, an entity informs a broad constituency of investors, employees, potential employees, suppliers, customers, and the general community about its efforts. The publication of this information can make new markets accessible for minorities and women and illustrate the progress made toward an important business goal.

| <b>POLICY &amp; PRACTICES STANDARDS</b><br><br>In a manner reflective of the individual entity’s size and other characteristics, the entity is transparent with respect to its diversity and inclusion activities by making the following information available to the public annually through its website or other appropriate communication methods. | <b>YES</b> | <b>NO</b> | <b>Activities that Support Program Success or Program Challenges</b> |
|--|------------|-----------|--|
| The entity publicizes its diversity and inclusion strategic plan.  |            |           |  |
| The entity publicizes its policy on its commitment to diversity and inclusion.   |            |           |  |
| The entity is transparent about its progress toward achieving diversity and inclusion in its workforce and procurement activities, which may include the entity’s current workforce and supplier demographic profiles.   |            |           |  |

**Practices to Promote Transparency of Organizational Diversity and Inclusion cont.**

| POLICY & PRACTICES STANDARDS  | YES | NO | Activities that Support Program Success or Program Challenges |
|---|-----|----|---|
| The entity publicizes its opportunities to promote diversity, which may include:<br><br>Current employment and procurement opportunities. |     |    |   |
| Forecasts of potential employment and procurement opportunities.  |     |    |   |
| The availability and use of mentorship and developmental programs for employees and contractors.  |     |    |   |

## Entities' Self-Assessment

Entities that have successful diversity policies and practices allocate time and resources to monitoring and evaluating performance under their diversity policies and practices on an ongoing basis. Entities are strongly encouraged to disclose their diversity policies and practices, as well as information related to their assessments, to the Bureau and the public.

| POLICY & PRACTICES STANDARDS<br>In a manner reflective of the individual entity's size and other characteristics: | YES | NO | Activities that Support Program Success or Program Challenges |
|---|-----|----|---|
| The entity conducts an assessment of its diversity policies and practices annually.                               |     |    |   |
| The entity monitors and evaluates its performance under its diversity policies and practices on an ongoing basis. |     |    |   |
| The entity publishes information pertaining to its assessment of its diversity policies and practices.            |     |    |   |

**Diversity Data**

| <b>WORKFORCE PROFILE</b>   |  |   |   |
|--|--|---|---|
| What are the numbers and percentages of women and minorities in the entity's total workforce for the period covered by this assessment?  | TOTAL WORKFORCE<br><input type="text"/>                                      | NUMBER OF WOMEN<br><input type="text"/><br>PERCENT OF WOMEN<br><input type="text"/> | NUMBER OF MINORITIES<br><input type="text"/><br>PERCENT OF MINORITIES<br><input type="text"/> |
| What are the numbers and percentages of women and minorities in the entity's Executive/Senior Level Officials and Managers job category for the period covered by this assessment? | TOTAL EXECUTIVE/ SENIOR LEVEL OFFICIALS AND MANAGERS<br><input type="text"/> | NUMBER OF WOMEN<br><input type="text"/><br>PERCENT OF WOMEN<br><input type="text"/> | NUMBER OF MINORITIES<br><input type="text"/><br>PERCENT OF MINORITIES<br><input type="text"/> |
| What are the numbers and percentages of women and minorities of the entity's Board of Directors for the period covered by this assessment?   | TOTAL BOARD MEMBERS<br><input type="text"/>                                  | NUMBER OF WOMEN<br><input type="text"/><br>PERCENT OF WOMEN<br><input type="text"/> | NUMBER OF MINORITIES<br><input type="text"/><br>PERCENT OF MINORITIES<br><input type="text"/> |

| <b>PROCUREMENT - SUPPLIER DIVERSITY</b>   |                                     |   |   |
|---|-------------------------------------|---|---|
| What is the entity's total annual procurement spend for the period covered by this assessment with women- and minority-owned businesses compared with the total procurement spend with all vendors and suppliers? | TOTAL SPEND<br><input type="text"/> | NUMBER OF WOMEN- OWNED SPEND<br><input type="text"/><br>PERCENT OF WOMEN- OWNED SPEND<br><input type="text"/> | NUMBER OF MINORITY- OWNED SPEND<br><input type="text"/><br>PERCENT OF MINORITY- OWNED SPEND<br><input type="text"/> |

## Additional information

Other information or comments the entity deems important regarding its assessment of its diversity policies and practices:

### Use of Information at the Bureau of Consumer Financial Protection

The Bureau may use information submitted by the entity to monitor progress and trends in the financial services industry with regard to diversity and inclusion in employment and contracting activities and to identify and highlight those policies and practices that have been successful. The Bureau will continue to reach out to entities, other federal financial regulators, and other interested parties to discuss diversity and inclusion in the financial services industry and share leading practices. The Bureau may also publish information disclosed by the entity, such as any identified leading practices, in any form that does not identify a particular entity or individual or disclose confidential business information.

