

Diversity Self-Assessment Template for OCC-Regulated Entities
Section 342(b)(2)(C) of the Dodd-Frank Wall Street Reform and Consumer Protection Act

The Office of the Comptroller of the Currency (OCC) provides this self-assessment template to national banks, federal savings associations, and federal branches and agencies of foreign banks (together, banks) regulated by the OCC 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 by a bank is voluntary. A bank that conducts a self-assessment of its diversity policies and practices using the standards contained in the Policy Statement may utilize this template or its own assessment tool.

USE OF DATA AND DECLARATION OF CONFIDENTIALITY

The OCC may use information submitted by the bank to monitor progress and trends in the financial services industry regarding diversity and inclusion in employment and contracting activities and to identify and highlight those policies and practices that have been successful. The OCC may also publish information disclosed by the bank, such as leading practices, in any form that does not identify a specific bank or individual or disclose confidential business information. Finally, if a bank submits confidential commercial information that is both customarily and actually treated as private by the institution, the bank can designate the information as such by checking the box below, in which case the OCC will treat the self-assessment information as private to the extent permitted by law, including the Freedom of Information Act, 5 U.S.C. 552, et seq.

By selecting "Yes" in this box, the bank represents the diversity self-assessment it is submitting is confidential commercial information that is both customarily and actually treated as private by the institution. If "Yes" is selected, the OCC will treat the self-assessment as private to the extent permitted by law, including the Freedom of Information Act, 5 U.S.C. 552, et seq.

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OMB Control No. 1557-0334
Expiration Date: 01/31/2020

SECTION I. BANK INFORMATION

Bank Name:

Period Covered by the Assessment (yyyy):

Date Submitted (mm/dd/yyyy):

Charter Number:

Address:

City:

State:

Zip Code:

Diversity and Inclusion (D&I) Officer or Equivalent:

Name:

Title:

Email Address:

Phone Number:

Fax Number:

Supplier Diversity Officer or Equivalent (if different from D&I Officer):

Name:

Title:

Email Address:

Phone Number:

Fax Number:

Diversity and Inclusion Website:

Brief Description of Bank Covered by this Assessment (e.g., governance structure, workforce size, total assets, geographic location(s), and community characteristics):

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SECTION II. ASSESSMENT OF THE BANK'S DIVERSITY POLICIES AND PRACTICES		
(1) Organizational Commitment to Diversity and Inclusion		
<i>The leadership of a bank with successful D&I policies and practices demonstrates its commitment to D&I. Leadership comes from the governing body, such as a board of directors, as well as senior officials and those managing the bank on a day-to-day basis. These standards inform how a bank promotes D&I in both employment and contracting and how it fosters a corporate culture that embraces D&I.</i>		
STANDARDS	Yes/No	Program Successes and/or Program Challenges
In a manner reflective of the individual bank's size and other characteristics,		
1.1 The bank includes D&I considerations in both employment and contracting as an important part of its strategic plan for recruiting, hiring, retention, and promotion.		
1.2 The bank has a D&I policy that is approved and supported by senior leadership, including senior management and the board of directors.		
1.3 The bank provides regular progress reports to the board and senior management.		
1.4 The bank regularly conducts training and provides educational opportunities on equal employment opportunity and on D&I.		
1.5 The bank has a senior level official, preferably with knowledge of and experience in D&I policies and practices, who oversees and directs the bank's D&I efforts.		
1.6 The bank takes proactive steps to promote a diverse pool of candidates, including women and minorities, in its hiring, recruiting, retention, and promotion, as well as in its selection of board members, senior management, and other senior leadership positions.		

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(2) Workforce Profile and Employment Practices		
<p><i>Many banks 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. Banks with successful D&I programs also regularly evaluate their programs and identify areas to be improved.</i></p>		
STANDARDS	Yes/No	Program Successes and/or Program Challenges
In a manner reflective of the individual bank's size and other characteristics,		
2.1 The bank implements policies and practices related to workforce D&I in a manner that complies with all applicable laws.		
2.2 The bank 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.		
2.3 The bank has policies and practices that create diverse applicant pools for both internal and external opportunities that may include:		
2.3.a. Outreach to minority and women organizations.		
2.3.b. Outreach to educational institutions serving significant minority and women student populations.		
2.3.c. Participation in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities.		
2.4 The bank utilizes both quantitative and qualitative measurements to assess its workforce D&I 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 bank, including the executive and managerial ranks.		
2.5 The bank holds management at all levels accountable for D&I efforts, for example, by ensuring that such efforts align with business strategies and individual performance plans.		

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(3) Procurement and Business Practices—Supplier Diversity		
<p><i>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 banks have achieved success at expanding available business options by increasing outreach to minority-owned and women-owned businesses. As in the employment context, banks 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, banks 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, banks' prime contractors often use subcontractors to fulfill the obligations of various contracts. The use of minority-owned or women-owned businesses as subcontractors provides valuable opportunities for both the minority-owned or women-owned businesses and the prime contractor. Banks may encourage the use of minority-owned and women-owned subcontractors by incorporating this objective in their business contracts.</i></p>		
STANDARDS	Yes/No	Program Successes and/or Program Challenges
In a manner reflective of the individual bank's size and other characteristics,		
3.1 The bank has a supplier diversity policy that provides for a fair opportunity for minority-owned and women-owned businesses to compete for procurement of 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 bank's assets, and the development of the bank's equity investments.		
3.2 The bank has methods to evaluate its supplier diversity, which may include metrics and analytics related to:		
3.2.a. Annual procurement spending.		
3.2.b. Percentage of contract dollars awarded to minority-owned and women-owned businesses by race, ethnicity, and gender.		
3.2.c. Percentage of contracts with minority-owned and women-owned business subcontractors.		
3.3. The bank has practices to promote a diverse supplier pool, which may include:		
3.3.a. Outreach to minority-owned and women-owned contractors and representative organizations.		
3.3.b. Participation in conferences, workshops, and other events to attract minority-owned and women-owned firms and inform them of contracting opportunities.		
3.3.c. An ongoing process to publicize its procurement opportunities.		

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(4) Practices to Promote Transparency of Bank's Diversity and Inclusion		
<p><i>Transparency and publicity are important aspects of assessing D&I policies and practices. Greater awareness and transparency give the public information to assess those policies and practices. Banks publicize information about their D&I 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 a bank's commitment to D&I, its plans for achieving D&I, and the metrics it uses to measure success in both workplace and supplier diversity, a bank 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.</i></p>		
STANDARDS	Yes/No	Program Successes and/or Program Challenges
<p>In a manner reflective of the individual bank's size and other characteristics, the bank is transparent with respect to its D&I activities by making the following information available to the public annually through its website or other appropriate communication methods.</p>		
4.1 The bank publicizes its D&I strategic plan.		
4.2 The bank publicizes its policy on its commitment to D&I.		
4.3. The bank is transparent about its progress toward achieving D&I in its workforce and procurement activities, which may include the bank's current workforce and supplier demographic profiles.		
4.4. The bank publicizes its opportunities to promote diversity, which may include:		
4.4.a. Current employment and procurement opportunities.		
4.4.b. Forecasts of potential employment and procurement opportunities.		
4.4.c. The availability and use of mentorship and developmental programs for employees and contractors.		

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(5) Bank's Self-Assessment		
Banks that have successful D&I policies and practices allocate time and resources to monitoring and evaluating performance under their D&I policies and practices on an ongoing basis. Banks are encouraged to disclose their D&I policies and practices, as well as information related to their assessments, to the OCC and the public.		
STANDARDS		Describe the Bank's Current Practices for Each Standard Below
In a manner reflective of the individual bank's size and other characteristics,		
5.1 The bank conducts an assessment of its D&I policies and practices annually.		
5.2. The bank monitors and evaluates its performance under its D&I policies and practices on an ongoing basis.		
5.3. The bank publishes information pertaining to its assessment of its D&I policies and practices.		

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SECTION III. DIVERSITY DATA							
Workforce Profile							
1.1. What are the numbers and percentages of women and minorities in the bank's total workforce for the period covered by this assessment?	Total Workforce #	Women #	Women %	Minorities #	Minorities %		
1.2. What are the numbers and percentages of women and minorities in the bank's Executive/Senior Level Officials and Managers job category for the period covered by this assessment?	Total Management #	Women #	Women %	Minorities #	Minorities %		
1.3. What are the total numbers and percentages of women and minorities on the bank's Board of Directors for the period covered by this assessment?	Total Board Members #	Women #	Women %	Minorities #	Minorities %		
Procurement - Supplier Diversity							
2.0. What is the bank's total annual procurement spend for the period covered by this assessment with women-owned, minority-owned, or minority women-owned businesses compared to the total procurement spend with all vendors and suppliers?	Total Spend \$	Women-Owned Spend \$	Women-Owned Spend %	Minority-Owned Spend \$	Minority-Owned Spend %	Minority Women-Owned Spend \$	Minority Women-Owned Spend %

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SECTION IV. ADDITIONAL INFORMATION

Other information or comments the bank deems important regarding its assessment of its D&I policies and practices:

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