February 5, 2014

Sent by email

Mr. Thomas Curry
Comptroller
Ms. Joyce Cofield, Executive Director, OMWI
Office of the Comptroller of the Currency

Ms. Sheila Clark
Director, OMWI
Board of Governors of the Federal Reserve System

Ms. Melodee Brooks
Senior Deputy, OMWI
FDIC

Ms. Tawana James
Director, OMWI
National Credit Union Administration

Mr. Stuart Ishimaru
Director, OMWI
CFPB

Ms. Pamela Gibbs
Director, OMWI
SEC

RE: Docket IS OCC-2013-0014

Public Comment on the OMWI
Proposed Interagency Policy Statement
Submitted by Azul Management Systems Institute

Dear Madams and Sirs:

As an active participant in the Greenlining Coalition, I had the opportunity to attend several meetings and briefings on the Proposed Interagency Policy Statement. There are several areas in which I wish to provide input so as to provide a voice for the thousands of Americans that are not privy to such information.

1. **Standardized Joint Standards.**
   As reports and data gathering will be covered over six if not more federal agencies it is important that there be both transparency in the information being provided and that such information can be compared across agencies. Hence there must be standardized data point collection so "apples can be compared with apples."

   In turn, this will allow the public greater ability to assess diversity policies and practices across the regulating entities.

2. **Self-Assessments**
   Having attended nearly 100 banking meeting with bank executives over the past 10 years, I can speak of personal experience that not all of the banking community reports information in a uniform fashion such as required on the FFEIC reports submitted to the FDIC. Some banks reports MBE/WBE Supplier Diversity buys in a lump sum, failing to differentiate between ethnic groups, male and female, etc.

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When numbers were drilled down we often found that such buys were to white women small business owners – again making no impact in creating jobs in the minority communities.

Further it's important that a specific date be set for these reports, such as March 1st to allow for sufficient time after the close of the year. Banks announce Quarter ending goals within two weeks of the close of quarter – they don't need six months to provide such data. It is insufficient to suggest in the Proposed Standards " regular and periodic basis."

Hence, it is important that the Proposed Interagency Standards again are consistent with one another so that "apples can be compared with apples." Some of the best collection reports I have seen have been produced by the California Public Utilities Commission under the leadership of Mike Peavey, and the California Department of Insurance which just began asking for such data.

3. **Creation of a Diversity Inclusion Caucus or Advisory Board**
   To ensure that the American public has a voice, I highly recommend the establishment of such an Advisory Board. Banks, while initially balking at this have come to rely on their Advisory Boards to serve dual roles – being both a voice for the community from which they serve, but also serve as Ambassadors to share with the community new products, or services that would benefit their communities. Such a Board would increase communication and information.

4. **Voluntary Reports**
   These reports must be mandatory – the banks simply won't do them if not required. While California enjoys such reports via Greenlining meetings, states such as Texas, Arkansas, et al have no such advocate group to ensure that these data points are collected and shared with the public.

   Additionally, while the Proposed Standards states "no assessment may be construed as a requirement…" this does not preclude the OMWI's from creating more stringent assessment standards that the American public can access.

While higher income Americans have recovered from the Great Recession and the purchase of luxury goods is growing exponentially – Middle America is not. The need for Supplier Diversity data is an important tool for encouraging local buying that creates jobs in inner city communities of color – particularly those in urban areas. Such reporting tools as proposed all contribute to this endeavor.

Thank you for your consideration.

Sincerely,

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cc: Greenlining Institute
Office of Maxine Waters