



HOWARD
UNIVERSITY

School of Law
November 21, 2013

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Docket ID OCC-2013-0014
Docket No. OP-1465
Docket No. CFPB-2013-0029
Release No. 34-70731; File No. S7-08-13
[SENT VIA EMAIL AND ELECTRONICALLY]

Professor Cheryl Nichols, Howard University School of Law, Requests the Offices of Minority and Women Inclusion (“OMWIs”) to Extend the Period for Public Comment on the Proposed Interagency Policy Statement

Dear Ms. Cofield, Ms. Clark, Ms. Brooks, Ms. James, Mr. Ishimaru, and Ms. Gibbs:

Professor Cheryl Nichols supports The Greenlining Institute and other public interest groups in their requests to extend the filing deadline for the “Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies

and Request for Comment" ("Joint Standards") beyond December 24, 2013. As you know, the Joint Standards are a critical tool for assessing and increasing diversity in the financial services industry. The current deadline, in light of the intervening holidays, does not allow sufficient time for stakeholders to submit thoughtful and meaningful comments. Specifically, the current deadline should be extended by 45 days for the following reasons:

- 1) The current period only gives the public 60 days to respond. The complex and far reaching effect of an interagency proposal gives stakeholders a tremendous amount of information to digest and analyze. This can be an especially time consuming task for community-based organizations, who have important input to provide yet may not be familiar with the comment process.
- 2) The December 24th deadline is during the holiday period for many Americans. People are less likely to work during this time of the year and to have sufficient time and resources to submit quality responses. In reality, this inconvenient deadline would make the actual number of days the public has to submit comments much shorter than 60 days.

The OMWIs have repeatedly expressed their commitment to public participation and their interest in ensuring that public feedback is fully developed and complete to inform the decision making process. The comment period is an opportunity to demonstrate this commitment to addressing the concerns of diversity stakeholders, including the most underserved.

For these reasons, please allow a 45-day extension from the current December 24, 2013, deadline. Thank you for the opportunity to engage and to provide feedback on this important issue.

Sincerely,



Cheryl Nichols

Associate Professor

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cc:

Danielle Beavers
The Greenlining Institute