



**National  
Urban League**

**Empowering Communities.  
Changing Lives.**

December 3, 2013

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Dear OMWI Director:

The National Urban League appreciates the opportunity to provide comments to the agencies' Offices of Minority and Women Inclusion (OMWIs) related to 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* (Standards). However, we are concerned that the current deadline -- December 24, 2013 (Christmas Eve) -- may inhibit *interested parties* from providing their input in a timely manner. We urge the agencies to extend the comment period by an additional 45 days to provide an adequate opportunity for the public to provide in-depth, high-quality comments to ensure everyone's voice is heard.

The National Urban League, a historic civil rights organization dedicated to economic advancement for communities of color, is an interested party with a stake in the outcome of the Proposed Standards. Founded over 100 years ago, we provide direct services to nearly 2 million people through our network of 95 affiliates in 36 states and 300 communities. We also work closely with a number of banks and financial institutions to ensure our program goals are successfully met. The final rule will directly affect the constituents we serve and the regulated entities we work with. Accordingly, the efficacy and impact of the Proposed Standards are major priorities for the National Urban League.

The Proposed Standards will define the diversity policies and practices in the financial services industry, where minorities and women have traditionally been locked out. Therefore, it is imperative that

interested parties have an adequate opportunity to provide high-quality, thoughtful comments to influence the final rule. The current deadline does not provide this opportunity, and consequently, may not garner a sufficient number of responses from the interested parties most impacted by the final rule. Because people are less likely to work during the holiday season, the effective comment period is less than 60 days, in application.

The agencies have repeatedly expressed a commitment to public participation to ensure the objectives of the Proposed Standards are met. To this end, we urge you to extend the comment period by 45 days to ensure interested parties have the opportunity to provide comments. The National Urban League looks forward to providing insightful comments to help guide the OMWIs in establishing realistic diversity policies and standards that will effectively increase the numbers of minorities and women in the financial services industry, at all ranks.

Sincerely,



Marc H. Morial  
President and CEO  
National Urban League