



**Office of the  
Comptroller of the Currency**  
U.S. Department of the Treasury

***Strategic Challenges and Opportunities  
for  
Minority Owned Institutions***

**January 28, 2014**

# Agenda



## Strategic Planning – Challenges and Opportunities

- **Strategic Planning: Defined**
  - What Is Strategic Planning – Really
  - Why Is It Necessary For You And The Industry
- **Strategic Planning: Environmental Clarity**
  - Environment And Proximity Factors
  - Financial Condition Trends
  - OCC Perspective On Key Risks
- **Strategic Framework**
  - Key Attributes Of A Good Strategic Plan
  - Common Pitfalls
- **Strategic Considerations**
  - Supervisory Priorities: Generic and Specific
  - Process Challenges And Key Mechanics
- **Questions**

## Strategic Planning is...



- True strategy is about positioning choices and bets as well as making hard choices about the unknown, uncertain and uncontrollable.
- Planning to reduce some uncertainty about the future and rationalizes the bet.
- Strategic thinking, assessing, planning, execution and measurement is about increasing the odds of success on your position or bet.
- Actions and execution are not picture perfect or to the exact dollar.
- If you are *entirely* comfortable with your strategy, then you may not have a truly **strategic** plan. Some aspect of it should make you uncomfortable, apprehensive.

## Strategic Planning is not...



- A long range plan - the major assumption is that current knowledge about future conditions is *sufficiently* reliable and the environment is assumed to be predictable
- A tactical plan - task oriented and describe how specific activities are achieved in a short time horizon (1-2 years)
- Financial plan - accounting focused, explicit, comparative
  - annual, quantitative, assuming high environmental stability or
  - financial representation of expected strategic outcomes
- Solely deliberative or iterative
- Nostalgia.. Hope..

# How Good Banks Get *Better*



<b><i>Planning, Planning, Planning</i></b>	<b><i>Strategic planning: focus on the basics</i></b>	<b>Discipline – stay with what you know</b>
<b>Know more: your bank, market and people</b>		<b>Risk management: good communications and enhanced controls</b>
<b>Superior talent – new people or internal development</b>	<b>Willingness to adapt to changing conditions</b>	<b>Execute, Execute, Execute</b>

## INFORMATION SOURCES:

Bankers Participating in OCC's 2008 Strategic Challenges Outreach Forums



## Strategic Orientation

Average Bank	Strong Bank
Day to Day Managing	Future focus
Seat of the pants decisions	Strategically timed decisions
Inward looking	Outward looking
Product oriented	User/Customer Oriented
Activities oriented	Results Oriented
Emphasis on "How to..."	Emphasis on "What if..."
Primarily Reactive	Primarily Proactive

## *Change Agents the Past 20 years.....*



- Increasing complexity.
- Non bank competition.
- Accelerating pace of change.
- Regulatory expectations.
- Expectations about returns on capital.
- Generational shifts in customer base.
- Value proposition shifts.
- Shifts in economic drivers (global, interdependent).
- Business model constraints.

*But most of that is behind us now...?*

# Economic Trends: GDP



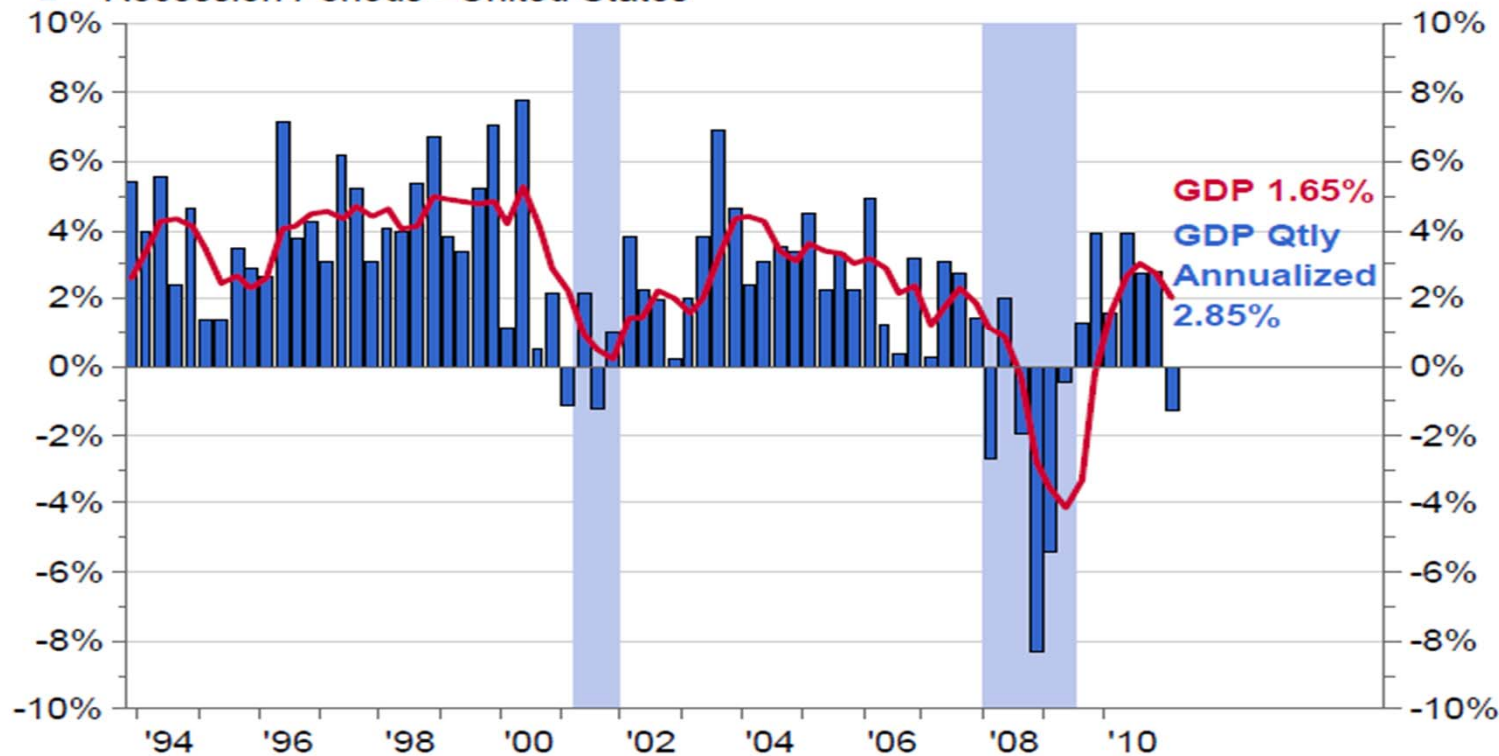
## US Real GDP Growth

[Launch full data release](#)

■ (% 1Q Ann) GDP, Bil. Chained 2000 \$, SAAR - US [Last Date: Q3-13]

— (% 1YR) GDP, Bil. Chained 2000 \$, SAAR - US [Last Date: Q3-13]

■ Recession Periods - United States



Source: BEA, E&PA

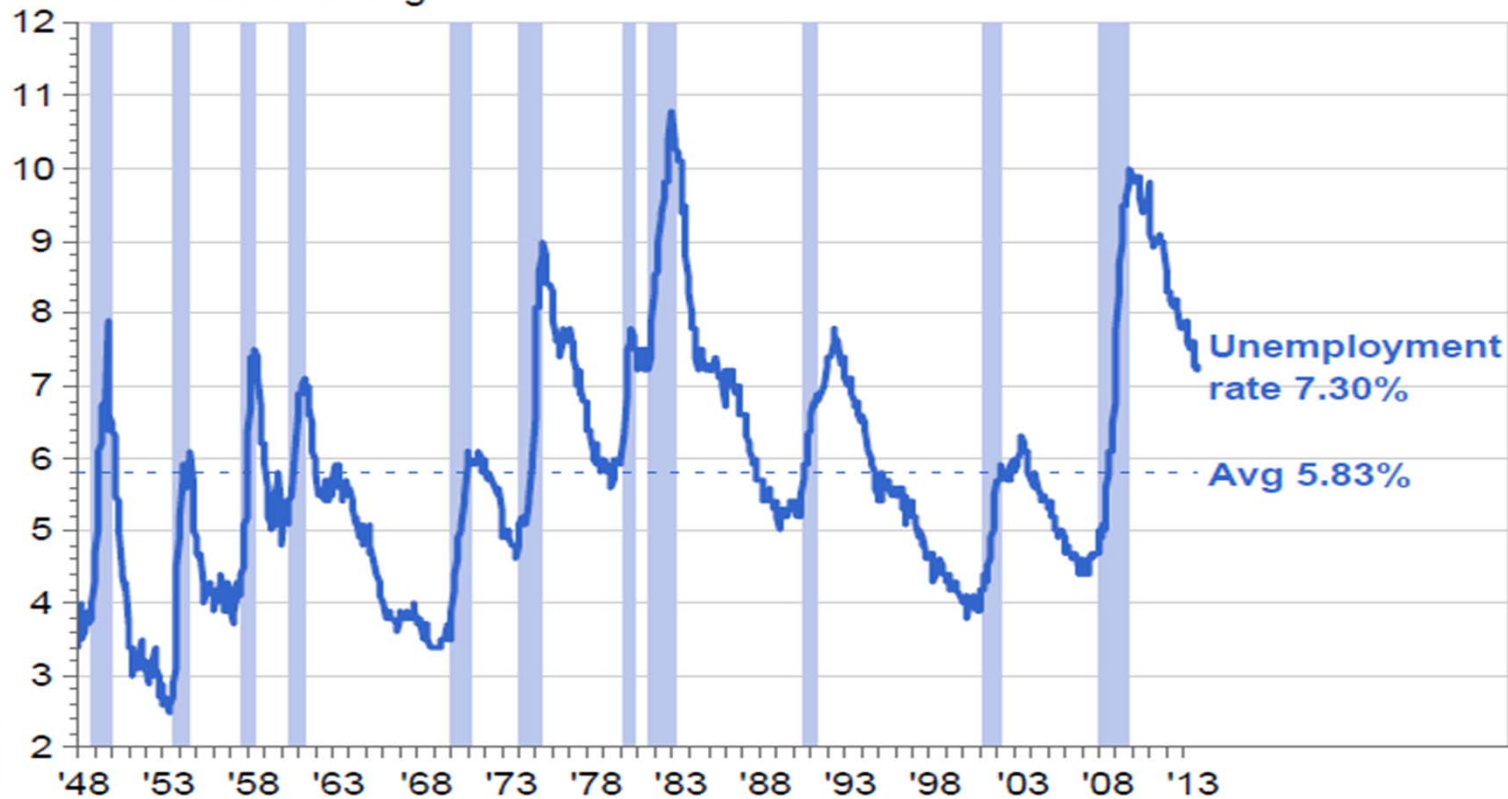


# Economic Trends: Unemployment



## US Unemployment Rate

- Unemployment Rate - %, SA - US [Last Date: 31-OCT-13]
- Recession Periods - United States
- - - Trendline: Average



Source: Dept of Labor, E&PA

## *External Environmental Factors.....*



- Divergent Housing Markets and Multiplier Effect
- Low Interest Rates – Unprecedented Level and Longevity, Entire Balance Sheet Resets
- Slow Job Growth & Lower Paying Jobs
- Working Poor, Inability to Save
- Evolution of Compliance – Dodd Frank, CFPB
- Global Interdependence
- PayPal, Lending Tree, Crowdfunding
- Uneven Playing Fields, Large Bank Creep

## External Environmental Factors.....



### “Aftershock” Bubbles

- *Real estate (uneven markets recovering more unevenly)*
- *Discretionary spending (some recovery, sequester cuts)*
- *Stock market (recovered)*
- *Private Debt (student loans are a-coming)*
- **Dollar** (value is now tied to multiple bubbles economy)
  - Yuan based currency standard? Bitcoins?
- **Government debt** (interest costs when rates rise ?)
  - \$8.5 Trillion in 2006, \$15 Trillion YE 2011

“Aftershock” by David & Robert Wiedemer, Cindy Spitzer



## *Internal (Proximity) Specific Factors.....*

- **Net Interest Margin Compression**
- **Overhead Costs: People/Facilities/Efficiency**
- **Lack of Sustainable Loan Growth**
- **Credit Concentrations**
- **Funding Composition, Excess Liquidity**
- **Risk Management, Compliance Costs**
- **Outsourcing, Vendor Reliance and Management**
- **Capital and/or Operational Constraints**
- **Expertise to Execute, Expertise to Compete**
- **Board and Management Succession**

# *All Federal and Minority Owned Institutions: An Overview*



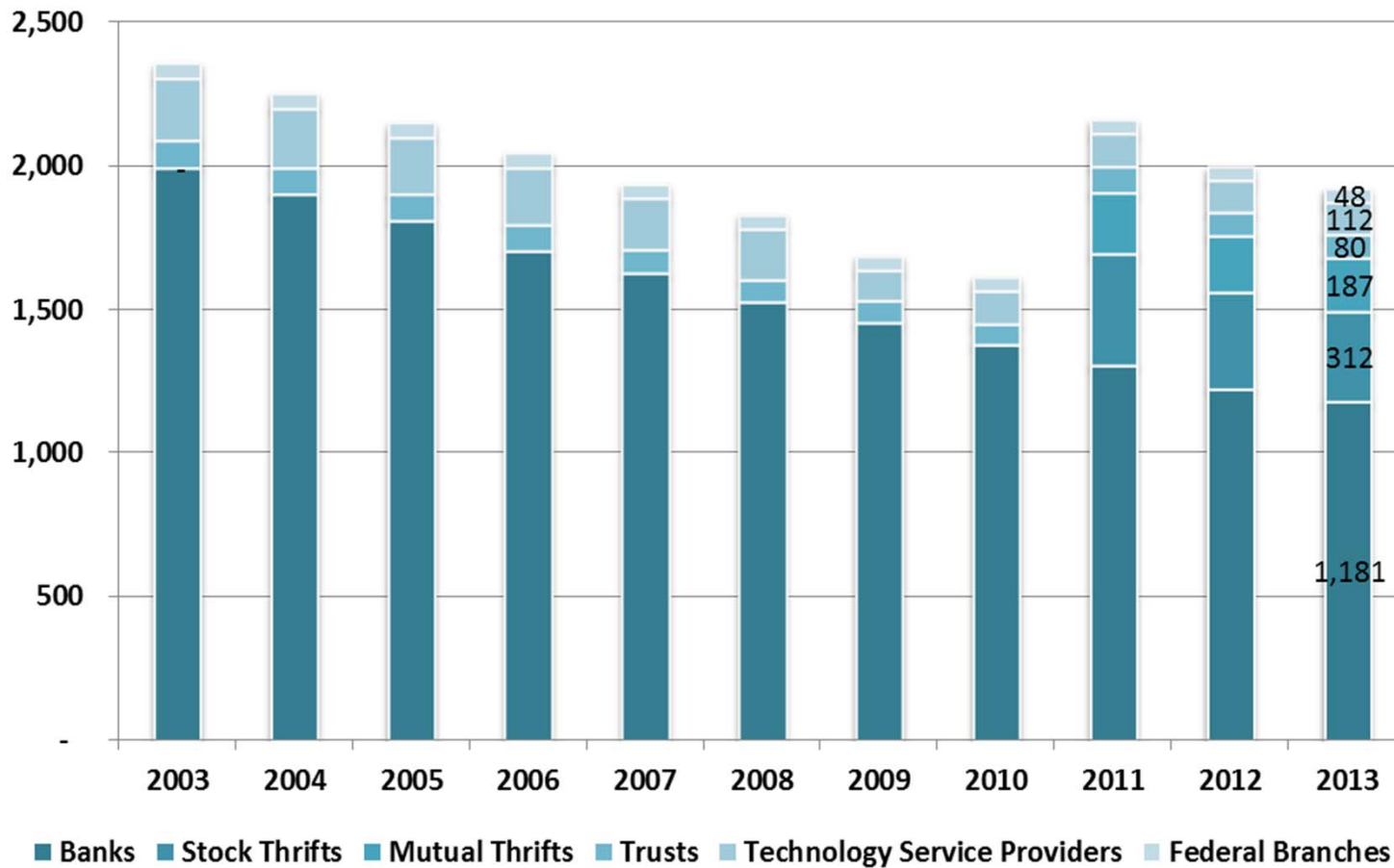
## **Overview** (Note: The term “banks” herein refers to banks and thrifts.)

- **Macro Issues**
- **Industry Trends**
- **Minority Owned Bank Trends**

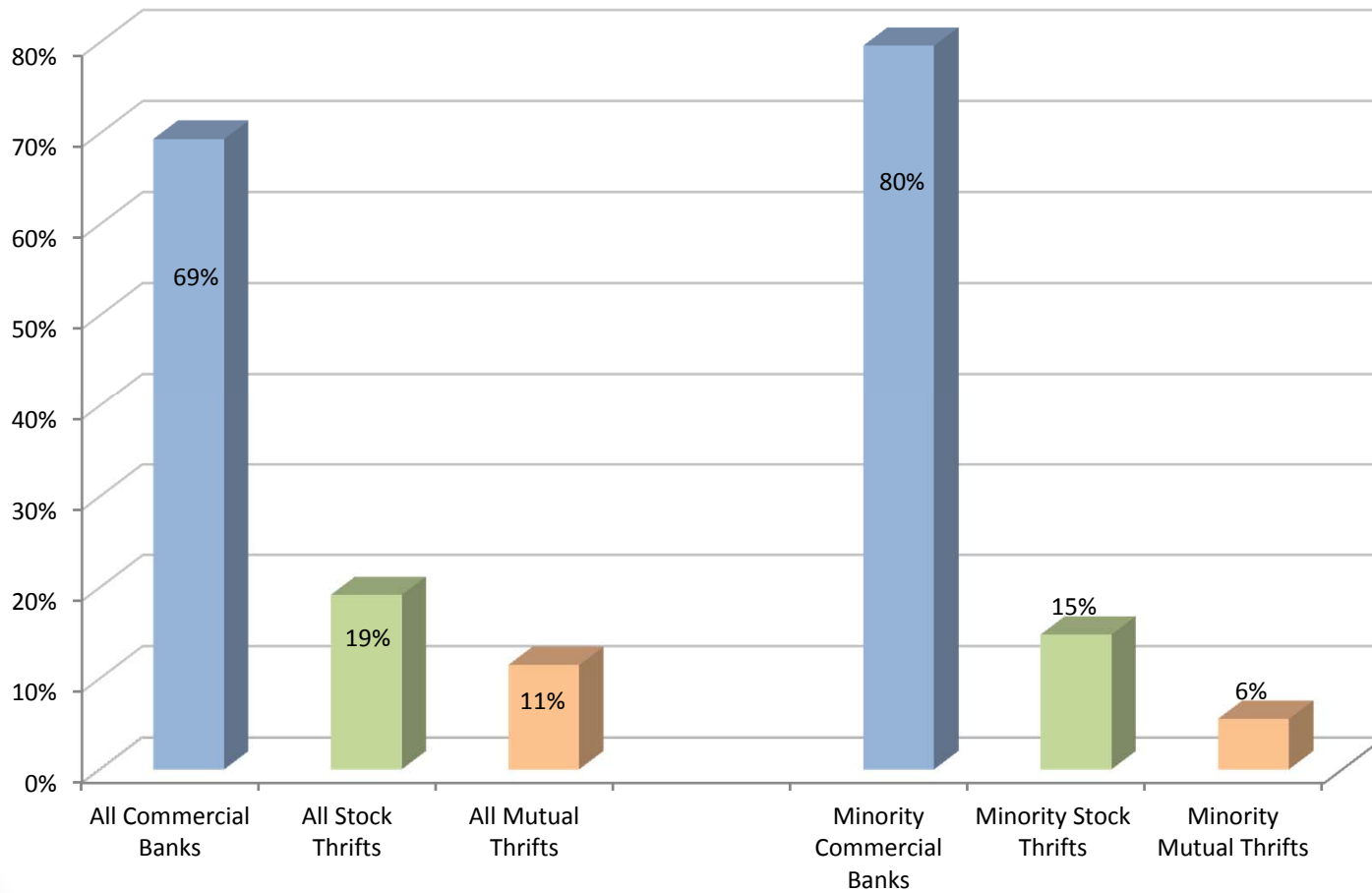
# Trends in OCC-Supervised Institutions, by Type



## OCC-Supervised Institutions by Type, 2003–2013



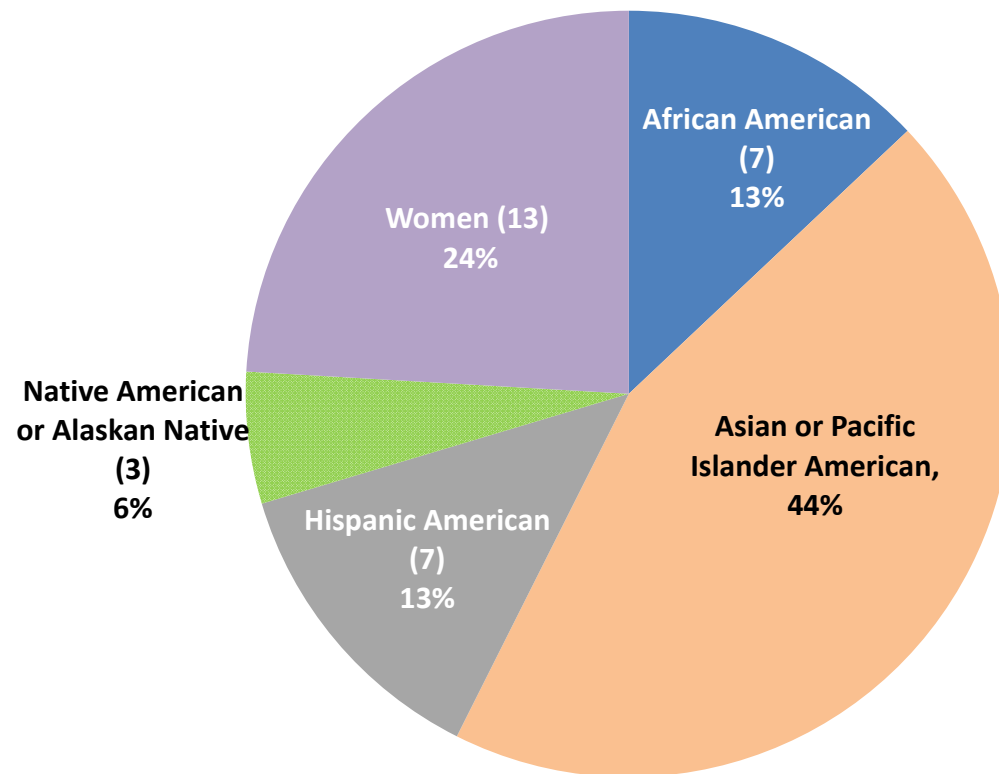
## Banks by Type (Commercial / Thrift)



# Minority Owned Banks by Ownership



## Minority Ownership as of 2013 Q3

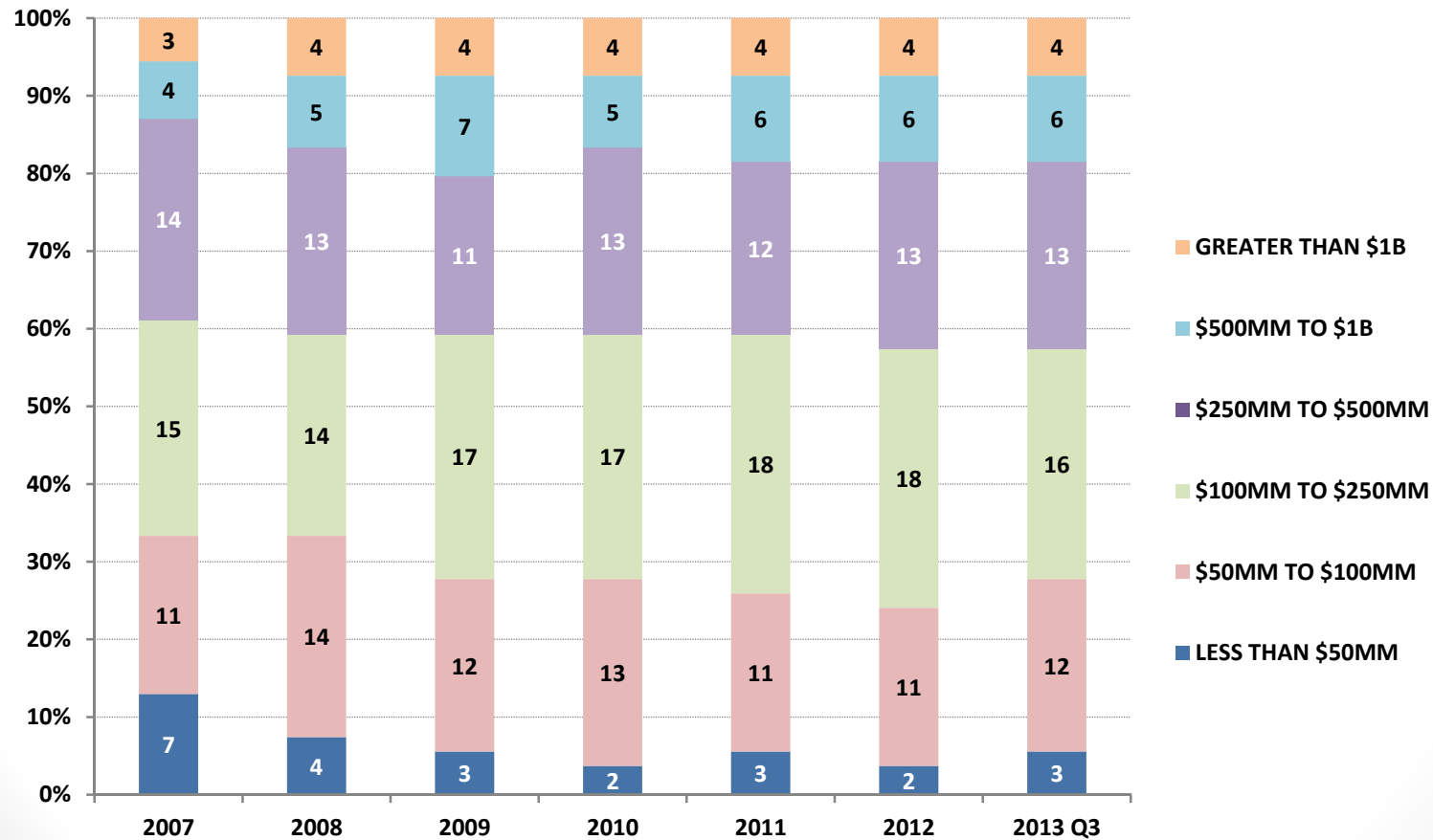






## Trends in Current Minority Bank Population

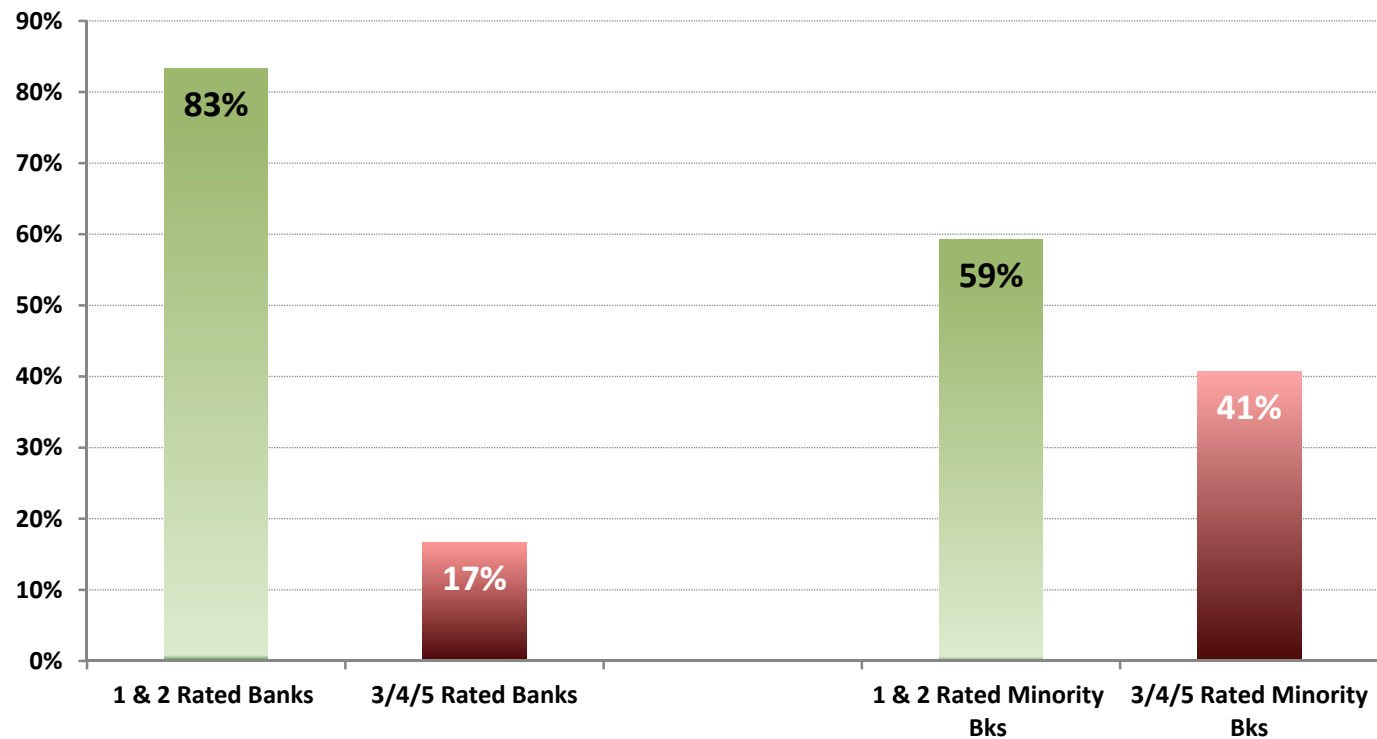
Today's OCC minority bank population totals 54. Below are the trends in asset size for this population from 2007 to the present. Most are under \$250 million in asset size and less than 10 percent are over \$1 billion.



# Minority Owned Banks Ratings Profile



## Composite Ratings Comparison of All Banks to Minority Owned Banks



# Financial Trends: Strengths and Weaknesses

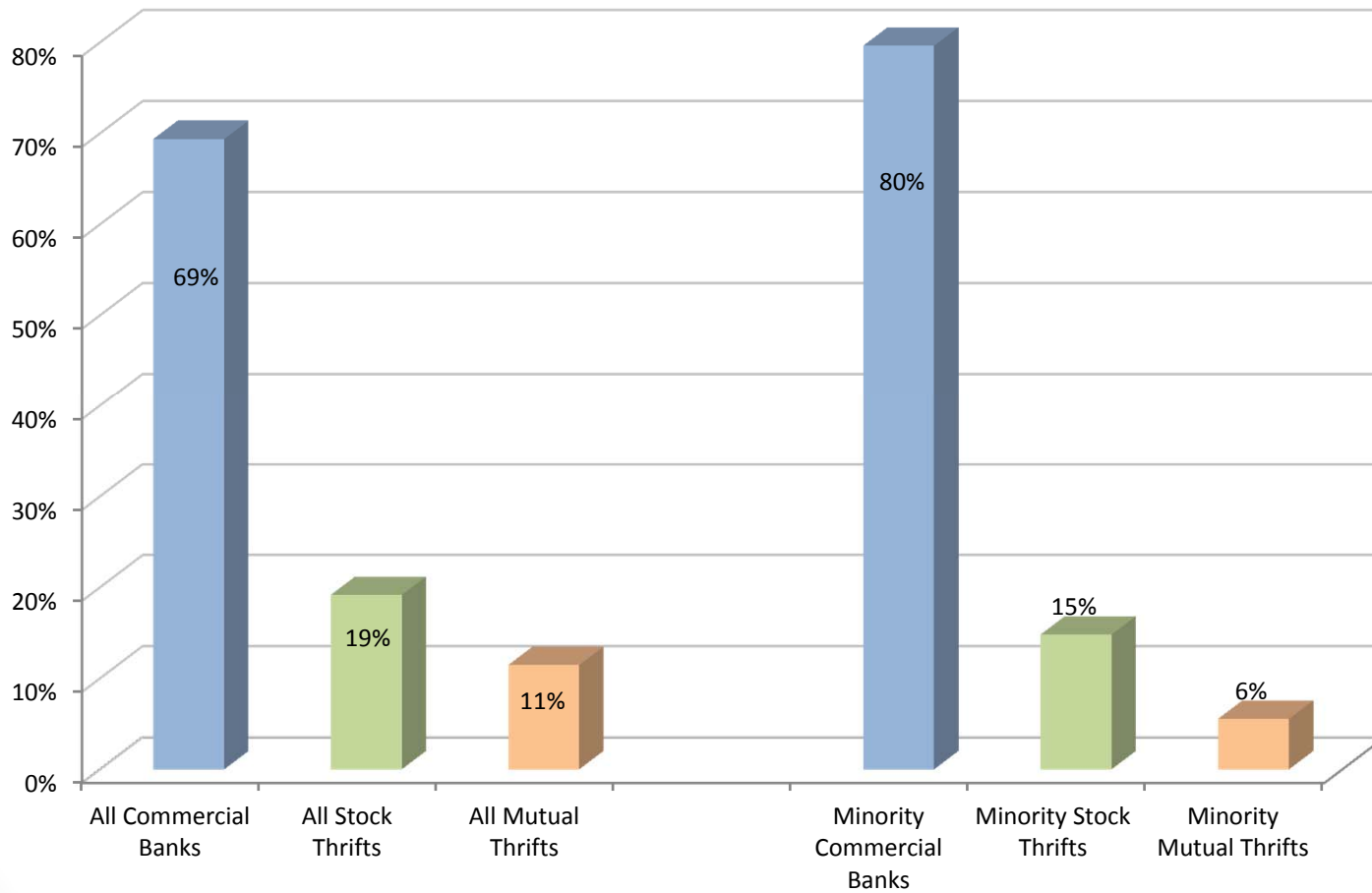


## Financial Trends: Strengths and Weaknesses\*

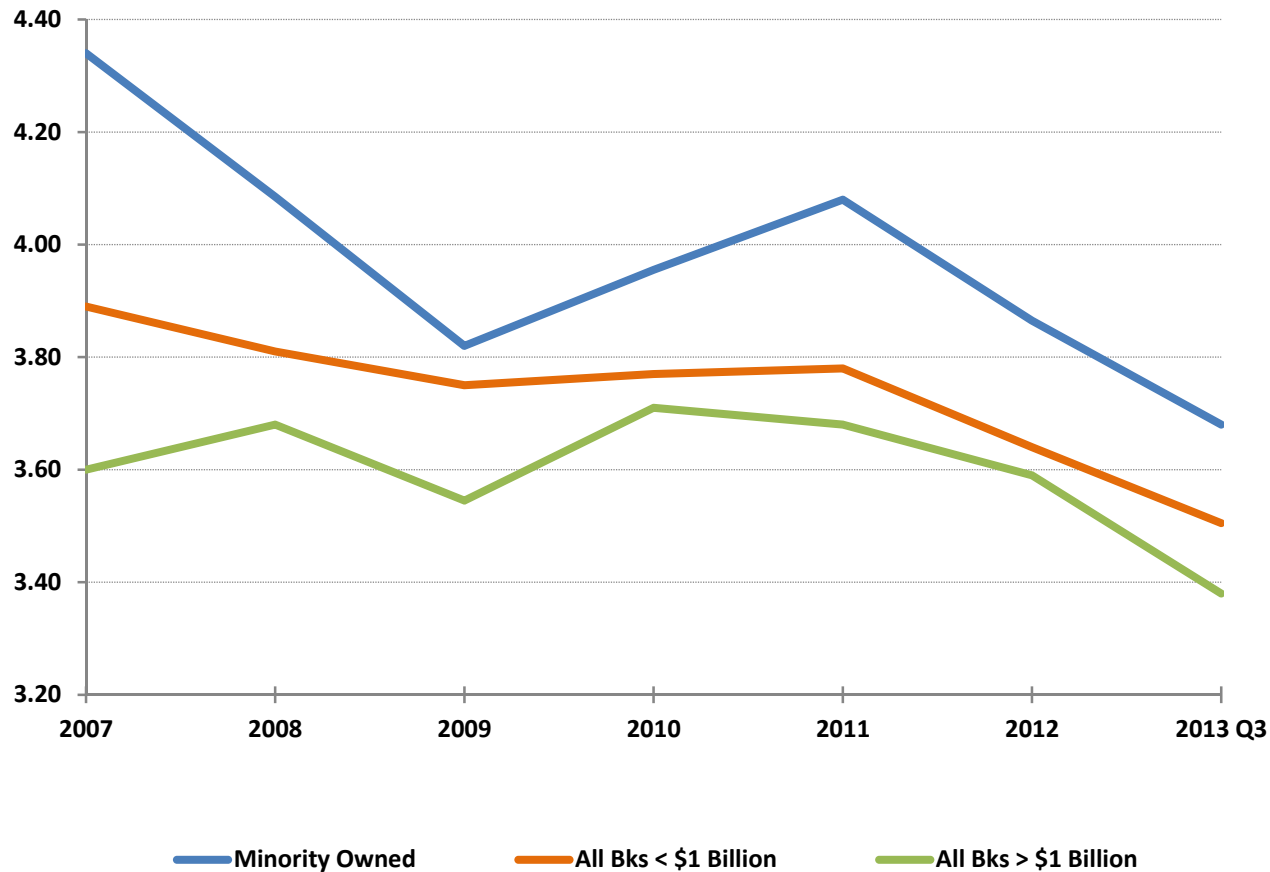
- Net Interest Margin
- Provision for Losses
- Efficiency Ratio
- Overhead Expense
- Minority Bank Earnings by Asset Size
- Return on Average Assets
- Tier 1 Leverage Capital
- Noncurrent Loans
- Net Losses
- Loan Growth
- Summary Comparison of Minority Banks to Banks > \$1 Bil

*\* NOTE: Data used in the following charts and graphs does not include the results of the OCC's large bank or trust portfolios. All ratios presented are medians of industry results through 2013 Q3. Thrift data is included beginning 2007 except for long term assets, which are included beginning in 2012.*

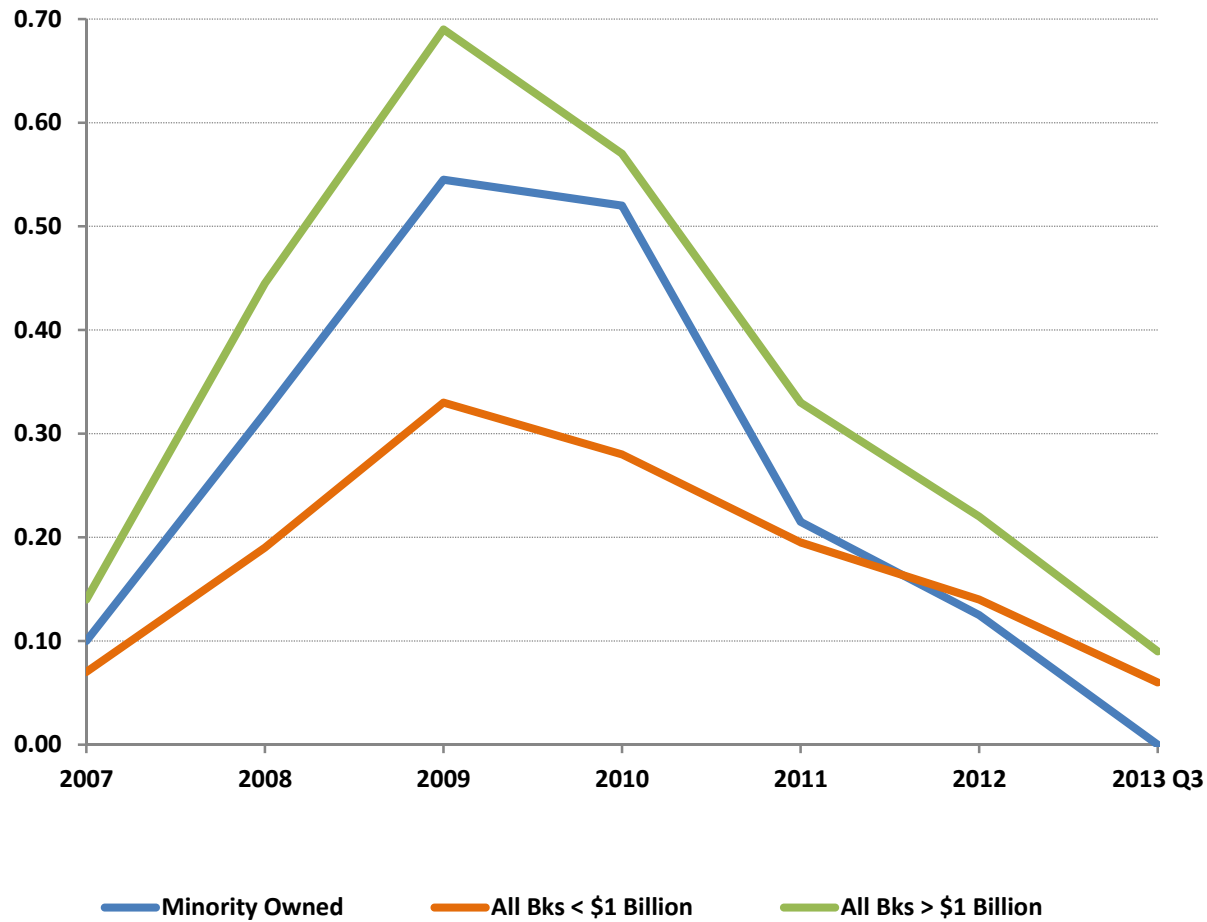
## Banks by Type (Commercial / Thrift)



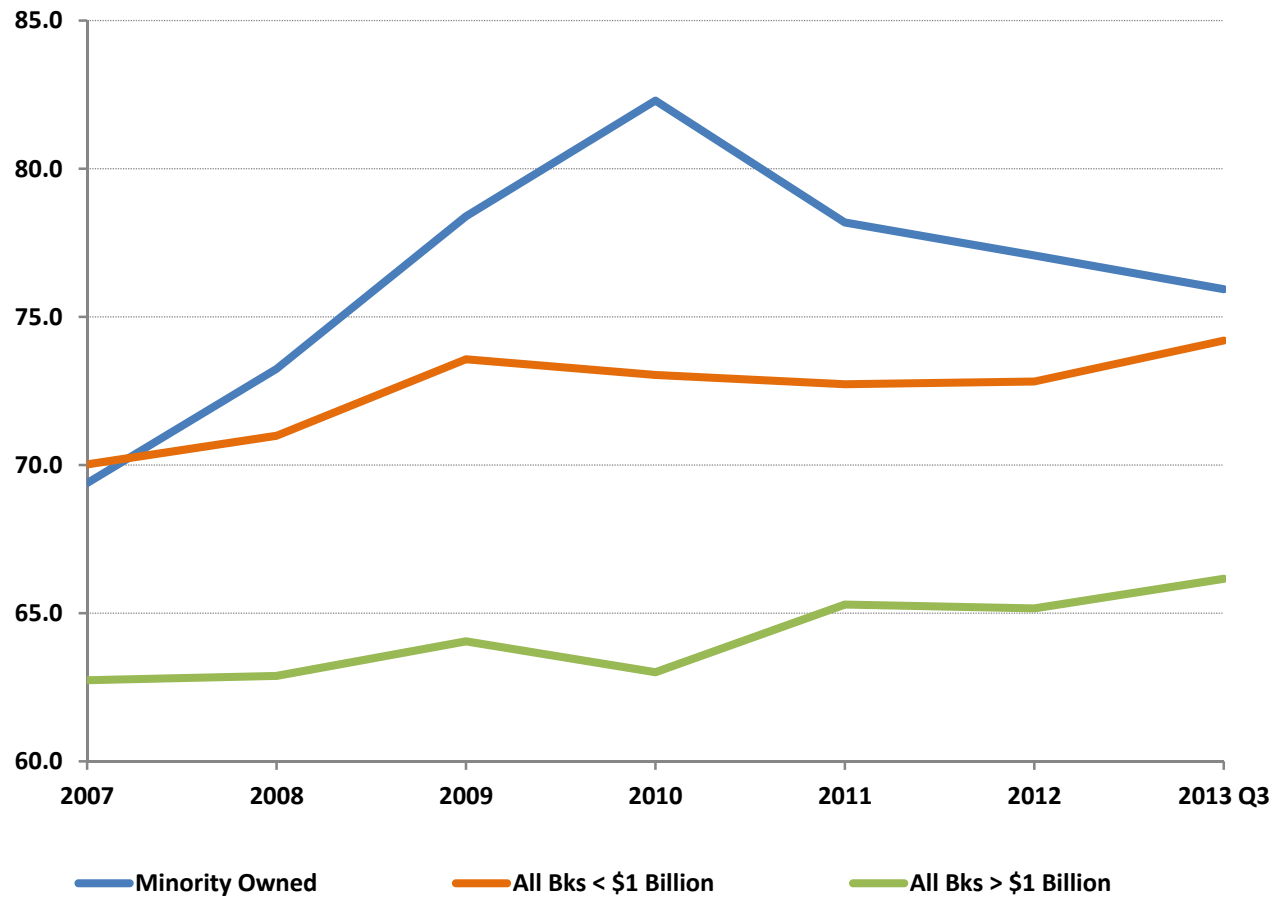
# Net Interest Margin



# Provision for Loan Losses to Average Assets



# Efficiency Ratio



## Overhead Expense Breakdown



### OVERHEAD EXPENSE BREAKDOWN

(As a percent of average assets)

As of 2013 Q3

Bank Type/Size	Personnel	Occupancy	Other	Total
Minority Owned	1.68	0.47	1.11	3.25
Less Than \$100 Million	1.56	0.34	1.06	2.96
More Than \$1 Billion	1.49	0.36	0.98	2.87



# Minority Bank Earnings by Asset Size

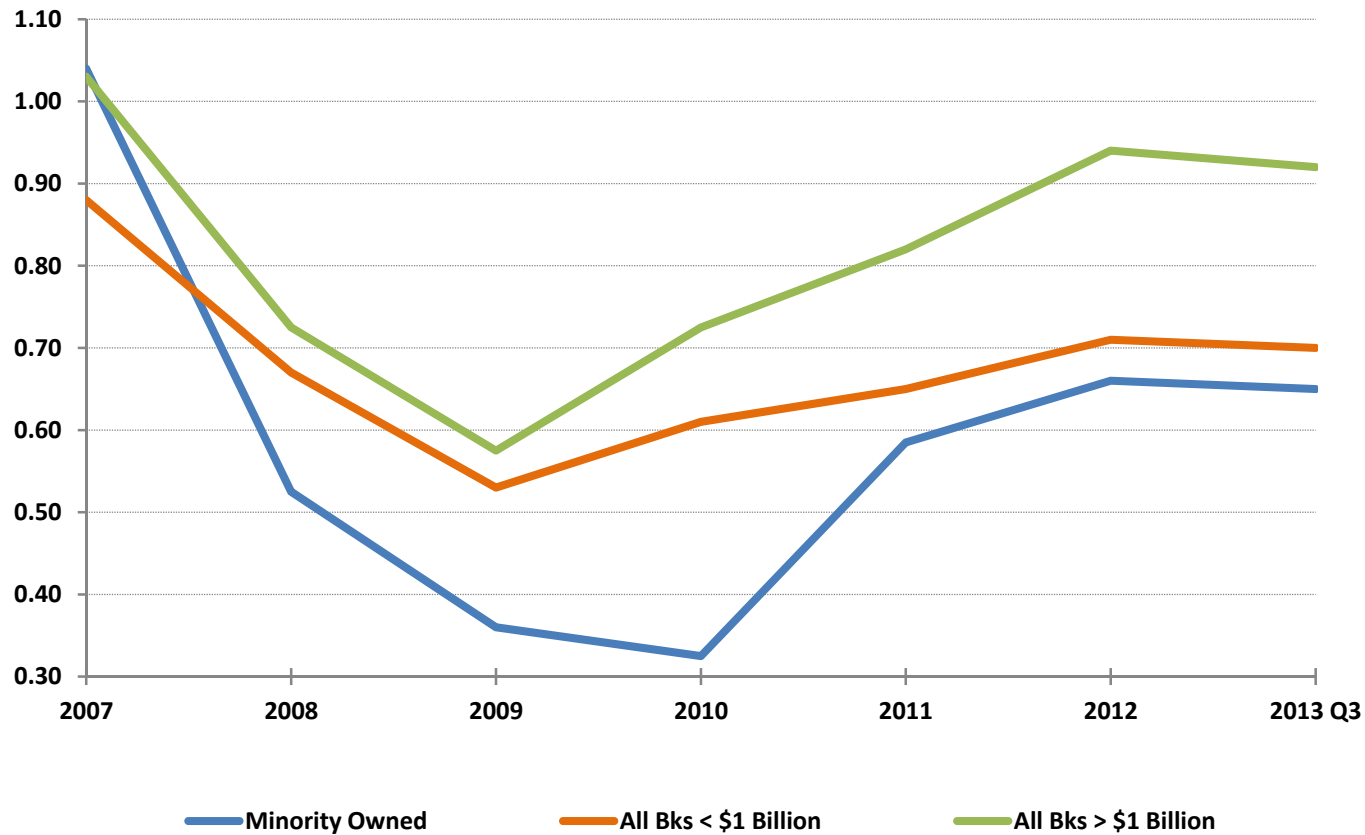


## Snapshot of Minority Owned Banks and Thrifts

- As of 2013 Q3 -

Asset Size	<\$50Mil	\$150-\$100Mil	\$100-\$250Mil	\$250-\$500Mil	\$500Mil-\$1Bil	>\$1Billion	All
# Institutions	3	12	16	13	6	4	54
INT INC (TE) / AA	3.28	3.90	4.28	3.79	3.87	4.08	3.98
INT EXP / AA	0.32	0.39	0.44	0.56	0.58	0.63	0.48
NET INT INC (TE) / AA	3.11	3.40	3.81	3.37	3.25	3.40	3.42
NONINT INC / AA	0.58	0.79	0.60	0.49	0.54	0.81	0.61
NONINT EXP / AA	5.02	3.69	3.34	3.23	3.30	2.81	3.25
PROVISION LN&LS LOSSES / AA	0.00	0.00	0.01	0.04	0.05	0.04	0.00
REAL GAINS (LOSSES) ON SECURITIES / AA	0.00	0.00	0.00	0.00	0.00	0.02	0.00
RETURN ON AA	0.87	0.59	0.74	0.48	0.71	0.89	0.65

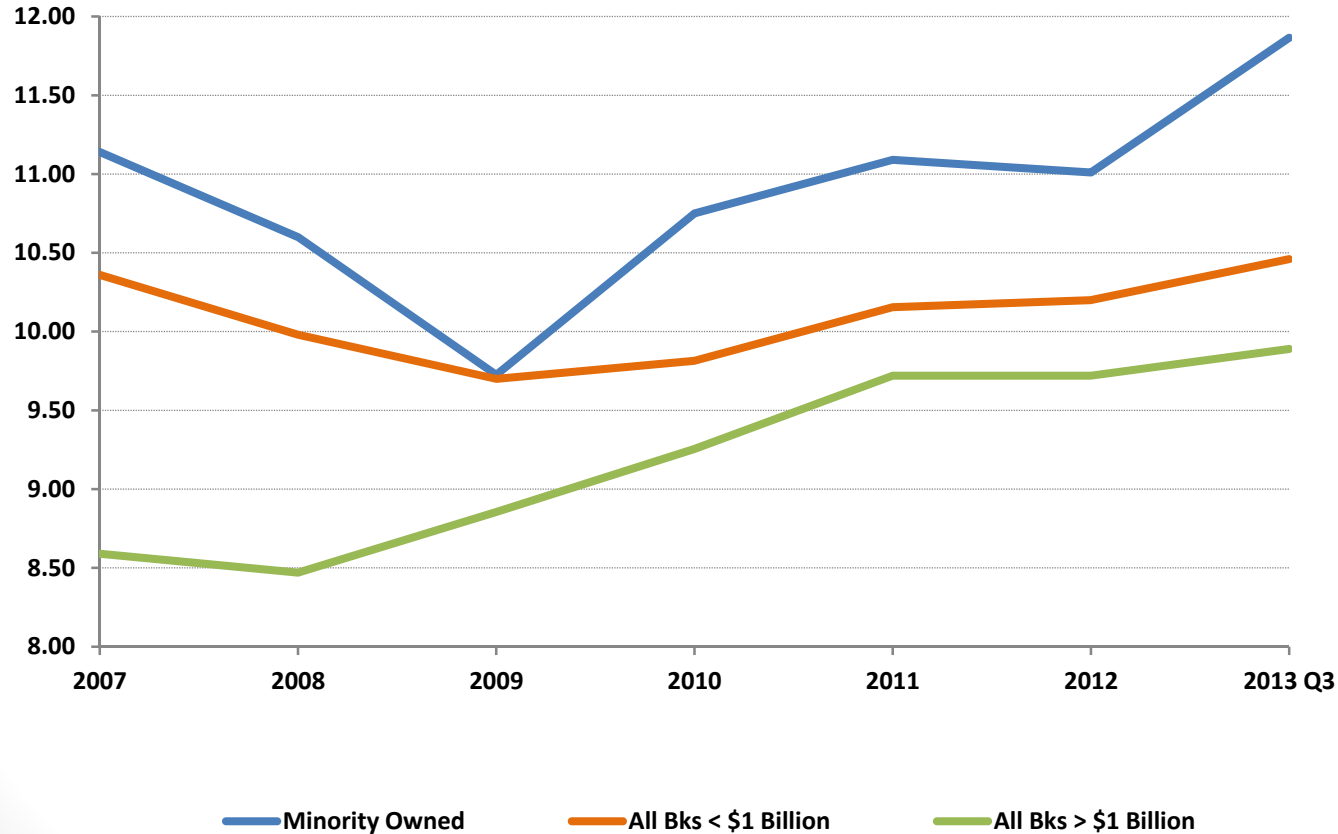
# Return on Average Assets



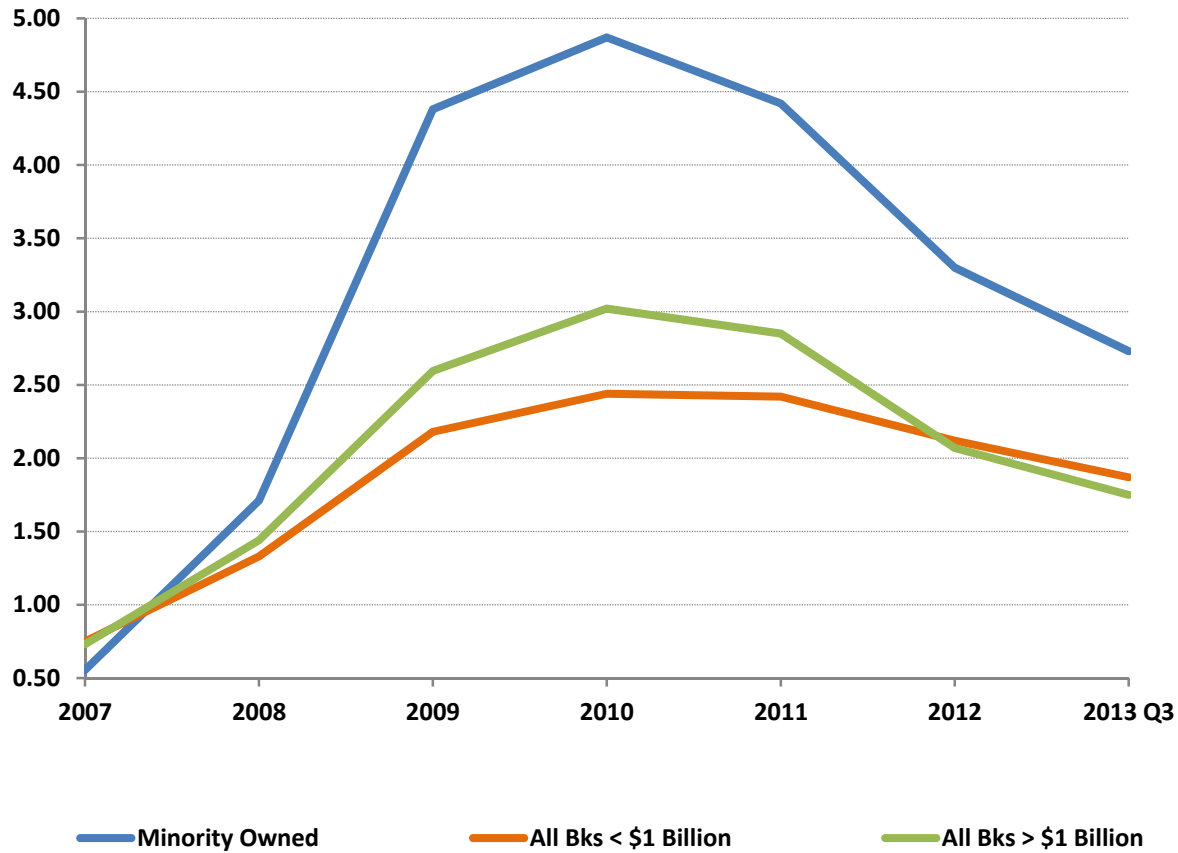


## Tier 1 Leverage Capital Ratio

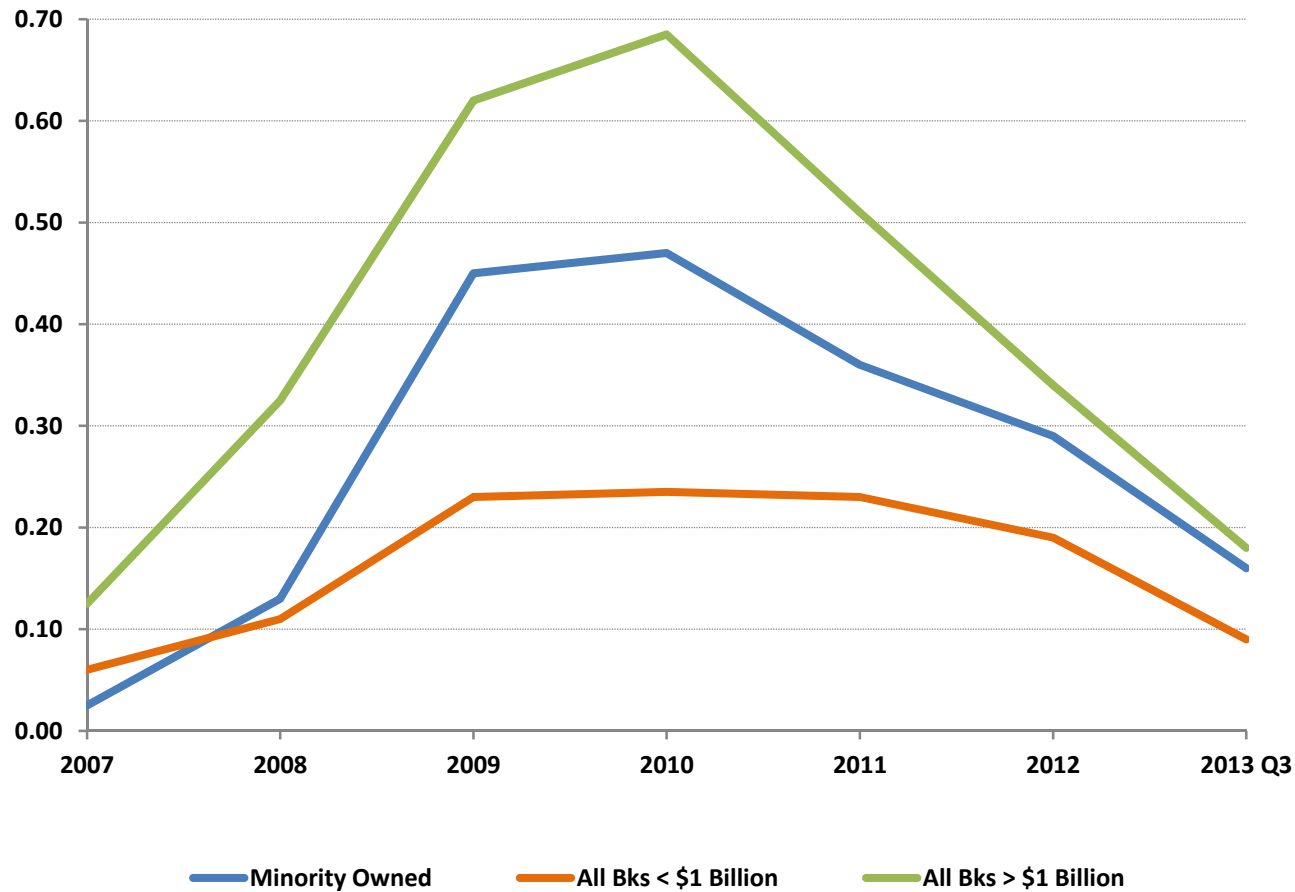
Although above the general population for this ratio, many minority owned banks are under OCC capital plans that require higher than minimum capital ratios.



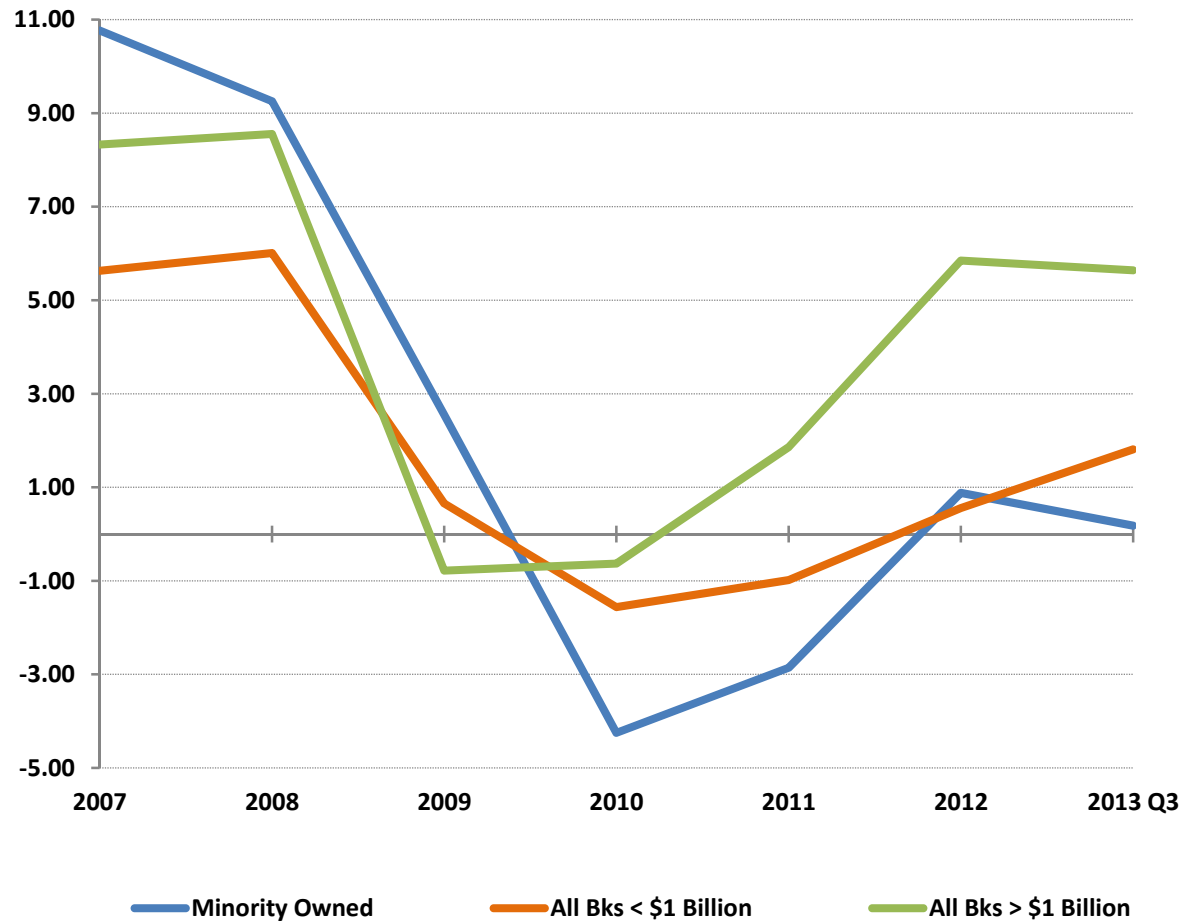
# Noncurrent Loans + OREO to Loans + OREO



# Net Losses to Average Total Loans



# Annual Loan Growth Rate



# Summary of Financial Performance Trends



## Financial Performance Comparison of Minority Owned Banks to Banks Under \$1 Billion from 2007 to the Present

	Banks < \$1 Bil			Minority Owned Banks		Minority Banks v. Banks < \$1Bil		
	2007	2013	% Change	2007	2013	Actual Result in 2013	% Change	% Change Result
NIM	3.89	3.51	-10%	4.34	3.68	Better	-15%	Worse
Provision for Loan Losses	0.07	0.06	-14%	0.10	0.00	Better	-100%	Better
Efficiency Ratio	70.02	74.20	6%	69.39	75.94	Worse	9%	Worse
ROAA	0.88	0.70	-20%	1.04	0.65	Worse	-38%	Worse
Tier 1 Leverage Capital	10.36	10.46	1%	11.14	11.87	Better	7%	Ok
Noncurrent Loans	0.75	1.87	149%	0.56	2.73	Worse	388%	Worse
Net Losses	0.06	0.09	50%	0.03	0.16	Worse	433%	Worse
Loan Growth	5.63	1.81	-68%	10.77	0.18	Worse	-98%	Worse
Long Term Assets to Total Assets	15.74	33.29	111%	14.27	30.61	Better	115%	Worse

## *Strategic Challenges and Opportunities*



- **Headwinds**
- **OCC Risk Priority and Perspective**





## *Headwinds*

- Economy expanding moderately but unevenly in 2014.
- States and metro areas recovering at different speeds.
- Different ethnic groups recovering at different speeds.
- Despite improvement, bank performance still under stress.
- Revenue pressures due to weak loan demand will continue.
- Cost of new and expanded compliance implementation.
- Quicker replication of product and services by others-regulated or not.
- Future capital requirements.



# National Risk Committee Risk Priorities

TOP SPECIFIC THREATS	MAJOR RISK AREAS	RANKING
Strategic Vulnerability	Strategic	1
Commercial Credit Underwriting HELOC EOD, Mortgages	Credit	2,3,4
Interest Rate Risk	IRR/Credit/ Price/Strategic	5
BSA/AML	Compliance /Reputation	6
Cyber Threats	Operational/ Reputation	7
Third Party Vendor Management	Operational/ Reputation	8



## Northeastern District Risk Priorities

TOP SPECIFIC THREATS	MAJOR RISK AREAS	RANKING
Strategic Vulnerability	Strategic	1
Asset/Liability Management	IRR/Credit/ Strategic	2
Credit/ALLL	Credit	3
Operational	Operational/Reputation	4
Compliance/BSA	Compliance/Reputation	5

## Strategic Planning



“ A chaotic external world requires internal cohesion and flexibility”.

“Strategy for Sustainability” by Adam Werbach

“ If you don’t know where you want to go, any road *might* get you there.”

“Unknown”

“ Failing to Plan is Planning to Fail”

OCC Strategic Planning Presentation Circa 1998



## Balanced Scorecard Collaborative Survey

- **95% of a typical workforce does not understand it's company's strategy.**
- **90% of organizations fail to execute their strategies successfully.**
- **86% of executive teams spend less than one hour per month discussing strategy.**
- **60% of organizations don't link strategy to budgeting**

**" Strategic Planning for Dummies"  
"Balanced Scorecard for Dummies"**

# How Good Banks Get Better



<b>Planning, Planning, Planning</b>	<b>Strategic planning: focus on the basics</b>	<b>Discipline – stay with what you know</b>
<b>Know more: your bank, market and people</b>		<b>Risk management: good communications and enhanced controls</b>
<b>Superior talent – new people or internal development</b>	<b>Willingness to adapt to changing conditions</b>	<b>Execute, Execute, Execute</b>

**INFORMATION SOURCES:**

Bankers Participating in OCC's 2008 Strategic Challenges Outreach Forums

## *A Good Strategic Plan*



- **Reflects values and culture of the organization through a mission and vision statement.**
- **Is truly strategic (vs. deliberate or emergent whereby hard decisions are avoided).**
- **A description of the company's long term goals and objectives.**
- **Defines the plans and criteria for achieving success**
- **Inspires change and revision in product, services, markets and execution.**
- **Assists everyone in daily decision making tactical operations**

## Finer Points of a Good Strategic Plan



- Establishes your unique and differentiating value proposition vs your competitors.
- Aligns the organization's activities with its particular environment.
- Executed through operations that provide different and tailored value to its customers.
- **Identifies clear tradeoffs and *clarifies what not to do and why.***
- Focuses and matches activities and resources to activities that fit together and reinforce each other.
- Drives continual improvement within the organization and moves it towards its long term goals.



## Strategic Planning Process: Simply Stated



- What do we want to be?
- Where are we now?
- Where do we want to go?
- Whose going to do want?
- **How are we doing?**
- What do we need to adjust?

## *Balance Scorecard Approach*



- **Synergistic with Enterprise Risk Management programs.**
- **Establish goals and objectives in four key areas instead of departments:**
  - **Financial**
  - **Customers and Stakeholders**
  - **Internal Business Processes**
  - **People or Organizational Capacity**

# *Types of Analytical Methodologies*



- **BCG Growth/Share Portfolio Matrix**
- **Competitor analysis**
- **Driving Forces Analysis**
- **Financial Ratios and Statement Analysis**
- **Five Forces Industry Analysis**
- **Issues Analysis**
- **Product Life Cycle Analysis**
- **Scenario Analysis**
- **Macroenvironmental (STEEP/PEST)**
- **SWOT Analysis**
- **Value Chain Analysis**
- **Win/Loss Analysis**

Source: **Analysis without Paralysis**

## *Performance Metrics*



- **Plan Implementation (tactical and operation targets)**
- **Profitability targets, Return on Capital**
- **Cost management**
- **Other management reports**
- **Market share: general or product/service**
  
- **Customer satisfaction and value surveys**
- **Employee surveys**
- **Change management assessment**
- **Challenge assumptions**
- **Evaluate strategic issues**



## *Common Traps to Avoid in Strategic Planning*

- **Forgetting that strategic decisions focus on uncertain and uncontrollable things.**
- **Short term thinking.**
- **Expecting strategic to achieve the accuracy and predictive results of cost planning.**
- **Cost based thinking. Applying familiar, comfortable cost-side approaches to revenue planning as if both are equal. Company control costs, customers control revenue.**
- **Confusing deliberative or “fast follower” frameworks as strategic in a rapidly changing environment.**
- **Leadership indifference. Planning for planning sake.**
- **No accountability.**



## *Common Traps to Avoid in Strategic Planning*

- **Relying on no information, bad information, limited or weak analysis (knowledge based companies in particular).**
- **Ignoring what your planning process reveals about your company.**
- **Capabilities are important but don't compel customers to your doorstep. A superior value proposition to your target group will.**
- **Not considering "change management" initiatives such as a Balanced Scorecard approach**
- **Being unrealistic about your ability to plan or actually implement.**
- **Overwhelming: fluff or not making the hard choices.**
- **No or inadequate progress measurement and reporting.**

# Strategic Considerations



## **Strategic Considerations for Community Banks**

## Strategic Considerations: Bank Success Drivers



- Managing credit and operational risks.
- Finding a niche/value proposition.
- Competing with sound, reasonable bankers.
- [Improving processes](#) - bigger factor than simply employing new technology.
- Managing increasing regulatory burden and costs.



## Strategic Considerations: Corporate Mindset



### What is your corporate mindset?

- “We can’t do it - we have never done it before”
- “We haven’t *seen* any community banks do it”
- “We are too different”
- “Banks I know who’ve tried it failed”
- “Let’s figure out if it’s prudent and profitable, then decide if we want to do it.

## Strategic Considerations



- **Are you a net interest margin “junkie”**
  - Community banks have difficulty pricing for risk
- **Margins may be a long time coming back**
  - Customers are price savvy
  - Balance sheet funding is more rate sensitive
  - Competition especially that outside the regulatory footprint
- **Existing traditional business model - higher cost, lower efficiency**
- **Consolidating industry: potential impact to you**
- **Can you really be all things to all people?**



## Strategic and Tactical Considerations:

- How can you improve revenue or reduce overhead?
- Are you offering the right products and services?
- What do you do best and are you maximizing those attributes?
- Do you know where and how you are making/losing money?  
What does your data-mining disclose?
- What value do your marginal products add?
- Do I have the right people with the right skills in place to execute our plan? How much will it cost and am I willing to pay for their skills for the long term benefit of the bank?
- Are there different ways for you to leverage your existing bank talent to build revenue or even foot/web traffic?
- How are changes in STaR (society, technology, resources) affecting your customer base?
- Do I target different customers or is there a way to make my existing client base better customers?
- **Can we afford to take that calculated risk? Can we afford not to?**

# Strategic Considerations to Objectives



## ONE CONSULTANT'S TOP 10

- Attract new customers
- Extend liabilities
- Restructure bond portfolios
- Grow wealth management
- Expand remote deposit capture
- Expand branch network (or reduce it )
- Hire new talent (retain/train existing staff )
- Renegotiate vendor contracts
- Clean up your loan process (upgrade technology)
- Convert time deposits to core accounts



## Balance Sheet Management Challenges

- Prolonged low interest rate environment makes it difficult to make a reasonable spread:
  - Lengthening maturities
  - Lower credit quality
  - More optionality/complexity
- Interest rate increases just to reach historical average would be significant.
- The move in interest rates could be sudden and/or significant given non-US influences.
- High levels of long-term fixed rate assets.
- Excess liquidity.
- Low level of non-maturity deposits in some banks, “surge” deposits, uncertainty of behavior when rates move upward.



## Operational Risk Challenges

- Increased outsourcing to supervised and unsupervised technology service providers
- New entrants difficult to identify and bring into supervisory umbrella
- Lack of direct control over subcontracted vendors and compliance with industry standards
- Consolidation is creating concentration risks
- Evolutionary and increasing phishing attacks
- Business continuity planning trade-offs
  - How much can you lose being offline before it hurts?
  - How much can you pay for the preparedness?



## Operational Risk: Risk Controls

- Auditors must understand your bank and your business activities.
- Scope sufficient to make accurate assessment.
- Reliability in results.
- Direct reporting to the Board of Directors or its audit committee.
- Communicate *what you need to know* not what you might want to hear with appropriate level of clarity and urgency when needed !
  - Significant repeat deficiencies or violations of law
  - Lack of adherence to approved frequency schedule, scope
  - Inadequate coverage in significant risk areas



## Strategic Considerations: New Product, New Services or New Delivery Channels

- Due diligence: Upside/downside
- Understand the risks.
- Key risk management functions participate.
- Expertise to ensure appropriate execution.
- Realistic plans and appropriate resources.
- Prudent limits (earnings, capital, reputation at risk).
- **Establish controls prior to launch, test controls during the early part of actual launch.**
- **Well defined “exit” strategy.**



## Strategic Considerations: Management Succession



“A critical difference between companies that manage succession well and those that don’t is the understanding that succession is a process, not an event.”

- Joseph Bower – *Solving the Succession Crisis by Growing Inside-Outside Leaders*: Harvard Business Review

- Management succession typically focuses on the President/CEO and ability to execute the existing strategy.
- Primary strategy has been to promote from within.
- Impact of unplanned, multiple staff losses can be detrimental to community banks –most individuals wear multiple “hats”.

## Strategic Considerations: Management Succession



### Hire the Right People

- Ensure you have qualified/competent officers
- Performance based compensation
  - quality vs. growth
- Hold responsible managers accountable ( You are not the “dole”)

### Maximize Their Abilities

- Engage in activities that maximizes their talent and potential to achieve return on their engagement.



## Strategic Considerations: Board Succession

“A critical difference between companies that manage succession well and those that don’t is the understanding that succession is a process, not an event.”

- Do you have a pipeline of potential directors?
- Is your board engaged, conversant in the issues, and capable of providing guidance and leadership?
- Is ongoing training provided to help your board understand the changing regulatory requirements?
- Is composition and skill set of your board well-rounded?
- **Is the Board that got the bank to “here” sufficient to get the bank to “there”?**



## Strategic Considerations: “Eyes Wide Open”

*Critically* re-evaluate your bank’s business model :

- Corporate structure
- Funding practices, non-traditional, non-maturity deposit analysis
- Product offerings
- Customer base(service levels, your responsiveness, relationship)
- Internal business operations and practices
- Overhead – fixed cost structure
- Market Image/Perceptions
- Capital capacity and stockholder expectations
- Risk management practices
- Employee engagement
- Role or obligation to the community you serve
- People, people, people
- Tone at the top

## Strategic Decisions



- **Develop and approve a strategic plan**
- **Establish specific, *measurable* goals. Be S.M.A.R.T.**  
*You get what you incent or allow*
- **Stay knowledgeable of your market, customers and internal environment**
- **Develop, set and enforce risk tolerances**
- **Provide a framework for policies**
- **Ensure capital planning remains robust.**
- **Review quarterly/update annually.**

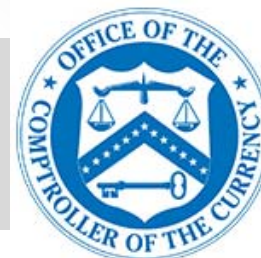


# Strategic Plan Monitoring

- **Measure what matters!**
- **Plan implementation (tactical and operational targets)**
- **Profitability targets, market share, return on capital, cost management and other management reports**
- **Risk control unit assessments**
- **Bank committee decisions**
- **Customer satisfaction and value surveys**
- **Employee engagement**
- **Executive engagement**
- **Challenge assumptions**
- **Evaluate strategic issues – redirect, adjust**

- **Source: “Analysis without Paralysis”**
  - **By: Babette Bensoussan**

# How Good Banks Get Into Trouble



<b>Ineffective Risk Management Systems</b>	<b>Weak Internal Controls</b>	<b>Lax Accountability</b>
<b>Uncontrolled Growth</b>	<b>Entering new area without proper controls, expertise, and financial analysis</b>	<b>Significant Deviations from Strategic Plans</b>
<b>Noncompliance with Policies or Procedures</b>	<b>Outsourcing Key Functions to Firms That Do Not Possess the Appropriate Expertise</b>	<b>Insider Fraud and Abuse</b>

# *Strategy Killers*



- Poor communications - up/down/externally
- Leadership indifference; managerial complacency
  - “No fire in the belly leads to a slow death”
- Executive hypocrisy
  - If leaders fail to walk the talk, no one else will
  - Large executive bonuses while employees take cuts in health care benefits
- Corporate isolation
  - Internal and external disconnect
- Staff apathy, disengaged



# How Good Banks Get Better



<b>Planning, Planning, Planning</b>	<b>Strategic planning: focus on the basics</b>	<b>Discipline – stay with what you know</b>
<b>Know more: your bank, market and people</b>		<b>Risk management: good communications and enhanced controls</b>
<b>Superior talent – new people or internal development</b>	<b>Willingness to adapt to changing conditions</b>	<b>Execute, Execute, Execute</b>

## **INFORMATION SOURCES:**

Bankers Participating in OCC's 2008 Strategic Challenges Outreach Forums



## *Strategic Orientation*

<b>Average Bank</b>	<b>Strong Bank</b>
<b>Day to Day Managing</b>	<b>Future focus</b>
<b>Seat of the pants decisions</b>	<b>Strategically timed decisions</b>
<b>Inward looking</b>	<b>Outward looking</b>
<b>Product oriented</b>	<b>User/Customer Oriented</b>
<b>Activities oriented</b>	<b>Results Oriented</b>
<b>Emphasis on “How to...”</b>	<b>Emphasis on “What if....”</b>
<b>Late follower</b>	<b>Adapts quickly</b>
<b>Primarily Reactive</b>	<b>Primarily Proactive</b>



## What are an Examiner's Primary Interests?

- Solvency and viability of the bank.
- Adherence to safe and sound banking practices.
- Adherence to the law.
- Fair access to credit.
- **Effectiveness of management and the Board in achieving the bank's strategic game plan (position or bet) without compromising the above.**

\*\* The bank's results as well as administrative, reporting and oversight process should make the above transparent. \*\*

## *Strategic Process Support*



- **Wide range of consultants**
- **Wealth of literature**
- **Information on legal and corporate precedents**
- **Your own employees**
- **The OCC**

# *Strategic Planning and Management*



# QUESTIONS?



***Strategic Challenges and  
Opportunities  
for  
Minority Owned Institutions***