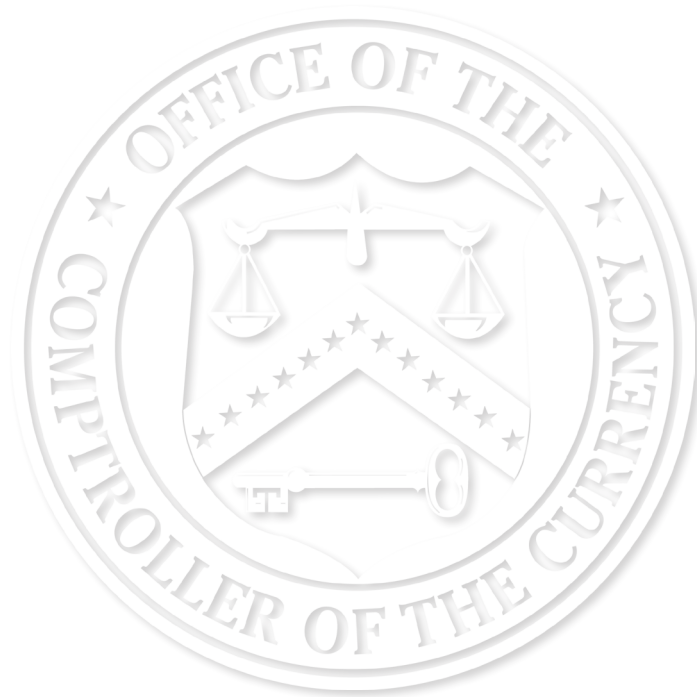




Office of the
Comptroller of the Currency

U.S. Department of the Treasury

Fiscal Year 2012
**Annual Report
to Congress**



Office of the Comptroller of the Currency
Office of Minority and Women Inclusion

**Office of Minority and Women Inclusion
Dodd-Frank Section 342
Fiscal Year 2012 Annual Report to Congress**

The Office of the Comptroller of the Currency's (OCC) mission is to charter, regulate, and supervise national banks and federal savings associations and to supervise the federal branches and agencies of foreign banks. The OCC's goals are to ensure these institutions operate in a safe and sound manner, provide fair access to financial services, treat customers fairly, and comply with applicable laws and regulations.

The OCC's Office of Minority and Women Inclusion (OMWI), established in January 2011, is responsible for compliance with section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (12 U.S.C. § 5452) (Dodd-Frank). Dodd-Frank requires federal financial agencies to submit an annual report to Congress regarding the actions the agency has taken pursuant to section 342. The OCC's Dodd-Frank Section 342 Fiscal Year 2012 Annual Report to Congress covers October 1, 2011 through September 30, 2012.

BUSINESS ACTIVITIES

1. Statement of the total amounts the OCC paid to contractors during the reporting period.

- For fiscal year 2012, the OCC awarded a total of 1,664 procurement actions representing total awards of \$117,655,195.¹

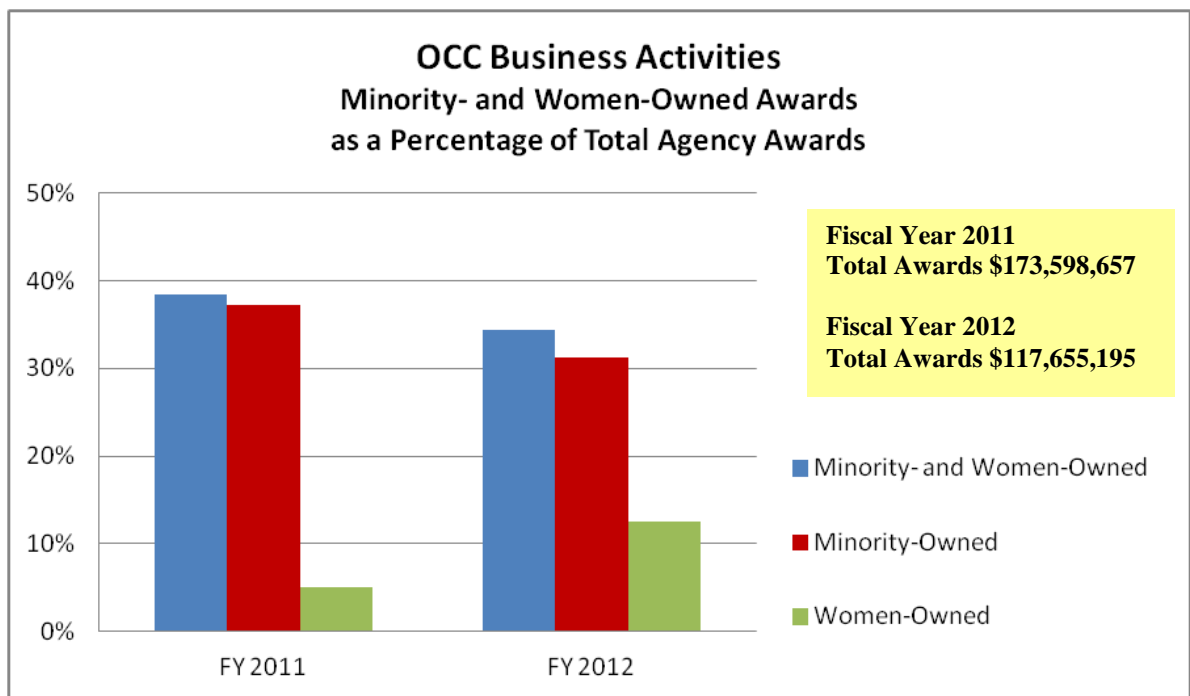
2. Percentage of the OCC's total awards to minority- and women-owned businesses; and the OCC's development and implementation of standards and procedures to

¹ The Federal Procurement Data System - Next Generation (FPDS-NG) is the source for all contracting data, including the total awards to minority- and women-owned businesses.

ensure contractors’ fair inclusion and utilization of minorities, women, and minority- and women-owned businesses.

- For fiscal year 2012, the OCC awarded 457 procurement actions to minority- and women-owned businesses, representing \$40,362,428 or 34.3 percent of the OCC’s total awards (*see* Table 1).
- The OCC’s percentage of total awards to minority-owned businesses was 31.3 percent and to women-owned businesses was 12.5 percent.²

Table 1



² Percentages to minority- and women-owned businesses are not mutually exclusive and do not total to the combined percentages of the minority- and women-owned business categories because some businesses are counted as both minority- and women-owned for purposes of the individual percentages.

In order to monitor the fair inclusion and utilization of minority-owned businesses, the OCC's OMWI tracks and analyzes the percentage of awards within minority demographic groups. For fiscal year 2012, the OCC's percentage of total agency awards to specific minority demographic groups were as follows:

- Asian Pacific American-Owned businesses – 17.1 percent;
- Black American-Owned businesses – 2.4 percent;
- Hispanic American-Owned businesses – 2.3 percent;
- American Indian/Native American-Owned businesses – 0.7 percent; and
- Other non-specific minority demographic businesses – 9.0 percent.³

In collaboration with the U.S. Department of the Treasury and the U.S. Small Business Administration (SBA), the OCC establishes annual small business contracting goals. The small business contracting goals include Small Disadvantaged Businesses (SDB)⁴ and Women-Owned Small Businesses (WOSBs). For fiscal year 2012, the OCC exceeded all of its small business goals (*see* Table 2). The OCC's successful Small Business Program has provided opportunities for the OMWI program to collaborate to increase the participation of minority- and women-owned businesses in the agency's contracts and coordinate technical assistance to these businesses.

³ For reporting purposes, in FPDS-NG the term "minority-owned business" refers to all businesses that indicate they are "minority-owned," including businesses that do not designate a specific minority demographic group.

⁴ A SDB is a small business that is at least 51 percent owned by one or more individuals who are both socially and economically disadvantaged. The term "socially disadvantaged" includes: African Americans; Asian Pacific Americans; Hispanic Americans; Native Americans; and Subcontinent Asian Americans. 13 C.F.R. § 124.103.

Table 2

**Small Business Contracting and
Minority- and Women-Owned Business Contracting
Fiscal Year 2012**

	Total Obligations	Overall Small Business	Small Disadvantaged Business (SDB)	Women-Owned Small Business (WOSB)	Historically Underutilized Business Zone Small Business (HUBZone)	Service Disabled Veteran-Owned Small Business (SDVOSB)	Minority-Owned Business	Women-Owned Business
SBA Goal		35.0%	5.0%	5.0%	3.0%	3.0%		
OCC Achievement	\$117,655,195	60.1%	32.7%	12.5%	7.4%	9.3%	31.3%	12.5%

Sources: Treasury Department Bureau Report (OCC excerpt) for small business contracting and FPDS-NG as of 10/3/2012 for minority- and women-owned businesses contracting

The OMWI tracks and analyzes minority- and women-owned business awards within categories for both “small” and “other than small” businesses. For fiscal year 2012, minority- and women-owned small businesses accounted for 23.5 percent of the OCC’s total awards; and minority- and women-owned other than small businesses accounted for 10.8 percent of the OCC’s total awards. The fiscal year 2012 data compares similarly to that of fiscal year 2011, during which minority- and women-owned small businesses accounted for 26.1 percent of the OCC’s total awards; and minority- and women-owned other than small businesses accounted for 12.3 percent of the OCC’s total awards. These results indicate the OCC’s OMWI program is not solely reliant on the success of the agency’s Small Business Program, but rather, the OMWI and Small Business Programs work in concert to increase diversity in the OCC’s business activities.

Since March 1, 2012, the OCC has inserted “Standards and Procedures for OCC Contractor’s Good Faith Efforts to Include Minorities and Women in the Contractor’s Workforce” (“Good Faith Efforts clause”) into all new contracts over \$150,000. In the Good Faith Efforts clause, contractors affirm their commitment, as well as the commitment of their subcontractors, to make good faith efforts to include minorities and women in their workforces. The OMWI reviews contractors’

good faith efforts, makes a determination whether any contractors have failed to make good faith efforts, and takes appropriate action as authorized by section 342.⁵

For fiscal year 2012, the OCC reviewed 11 contractor submissions of good faith efforts. Of the 11 reviewed, 6 companies had less than 50 employees and 5 had more than 50 employees. Consequently, the majority of these contractors were not required to submit Standard Form 100 (EEO-1) reports to the Equal Employment Opportunity Commission (EEOC)⁶ or subject to the Office of Federal Contract Compliance Programs (OFCCP) equal employment opportunity requirements.⁷ This created a challenge for contractors who had not previously been required to establish a written plan or program outlining their diversity efforts and results. The OMWI answered contractor questions on documentation required to assess good faith efforts. Given that a majority of OCC contractors are small businesses, the OMWI expects to continue to spend time providing technical assistance on contractors' compliance with the Good Faith Efforts clause and efforts toward the fair inclusion of minorities and women in their workforces.

To date, after reviewing the contractors' good faith efforts submissions, there have been no instances where a recommendation for further action has been necessary.

3. Successes achieved and challenges faced in the OCC's outreach to, and contracting with, minority- and women-owned businesses.

During fiscal year 2012, the OCC engaged in numerous outreach activities to enhance awareness

⁵ The OCC requires a written affirmative action plan or other written program designed to ensure the fair inclusion of minorities and women in the contractor's workforce, including outreach, recruitment, and training efforts whereby the contractor sets forth specific, results-oriented policies and procedures.

⁶ The EEOC requires Standard Form 100 (EEO-1) reports for all federal contractors (private employers) who are not otherwise exempt and: (1) have 50 or more employees; and (2) are prime contractors or first-tier subcontractors and have a contract, subcontract, or purchase order amounting to \$50,000 or more.

⁷ The OFCCP regulations implementing Executive Order 11246 require supply and service contractors – generally those with 50 or more employees and a contract of \$50,000 or more – to develop and maintain a written affirmative action program.

and be responsive to potential contractors concerning procurement opportunities.

The OMWI Executive Director met with the Black Economic Council, the Latino Business Chamber of Greater Los Angeles, and the National Asian American Coalition in February 2012, and the Comptroller of the Currency and the OMWI Executive Director met with these groups again in June 2012.

In order to provide specific technical assistance to minority- and women-owned businesses, the OCC hosted two highly successful vendor outreach sessions:

- **Meet the OCC: Vendor Outreach Session**, which was attended by OCC business unit leaders and 57 businesses (February 29, 2012)
- **Women-Owned Business Workshop**, featuring speakers from the SBA and U.S. General Services Administration, was attended by 20 women-owned businesses (August 15, 2012). After attending this OCC-sponsored outreach event, one business, owned by a minority woman, successfully competed for an \$80,000 OCC contract.

The OCC also participated in the following events:

- **National Minority Supplier Development Council National Conference**
November 1-2, 2011 – Atlanta, Georgia (attended workshops and networked with businesses)
- **National 8(a) Association 2012 Winter Conference**
February 7-8, 2012 – Orlando, Florida (attended workshops and participated in one-on-one matchmaking sessions with 16 businesses)
- **2012 Office of Small and Disadvantaged Business Utilization (OSDBU) Procurement Conference**
April 19, 2012 – Washington, DC (exhibited and participated in one-on-one matchmaking sessions with 10 businesses)

- **National Small Business Week**
May 22, 2012 – Washington, DC (OCC Acquisitions Management Division participated in matchmaking sessions with 5 businesses)
- **National Association for the Advancement of Colored People’s Leadership 500 Conference**
May 24-27, 2012 – Destin, Florida (attended workshops and networked with businesses)
- **Women’s Business Enterprise National Conference**
June 18-21, 2012 – Orlando, Florida (exhibited and participated in one-on-one matchmaking sessions with 6 businesses)
- **League of United Latin American Citizens’ National Conference**
June 25-30, 2012 – Orlando, Florida (exhibited and networked with businesses)
- **National Council of LaRaza’s National Conference**
July 7-10, 2012 – Las Vegas, Nevada (exhibited)
- **National Association for the Advancement of Colored People’s National Conference**
July 7-12, 2012 – Houston, Texas (exhibited)
- **National Urban League’s National Conference**
July 25-28, 2012 – New Orleans, Louisiana (exhibited)
- **Congressional Hispanic Caucus Institute**
September 11-13, 2012 – Washington, DC (attended sessions and networked with businesses)
- **Congressional Black Caucus Foundation Annual Legislative Conference**
September 19-22, 2012 – Washington, DC (exhibited and OMWI Executive Director presented during section 342 panel discussion)
- **National Historically Black Colleges and Universities Week Conference**
September 25-26, 2012 – Washington, DC (exhibited)

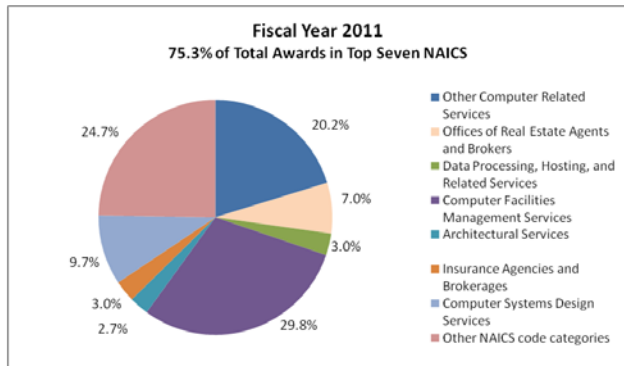
During fiscal year 2012, the OCC Acquisitions Management Division and OWMII staff members participated in the following Treasury OSDBU matchmaking sessions with minority- and women-owned small businesses:

- January 11, 2012 (IT firms only; met with 15 vendors)
- March 7, 2012 (women-owned small businesses; met with 12 vendors)
- May 2, 2012 (met with 13 vendors)
- June 6, 2012 (HUBZone and SDVOSB business firms; met with 9 vendors)
- August 8, 2012 (met with 15 vendors)

At these vendor outreach sessions, minority- and women-owned small businesses met one-on-one with OCC staff members, discussed their capacity to provide goods and services to the OCC, and received technical assistance on doing business with both the OCC and the federal government.

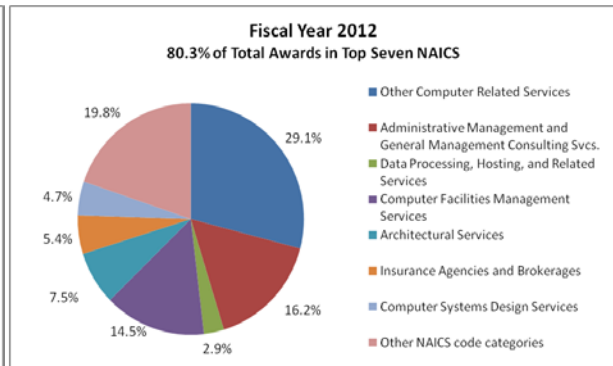
During this fiscal year, the OMWI researched and analyzed its top North American Industry Classification System (NAICS) code award categories and compared the results to fiscal year 2011. The OCC has a concentration of awards primarily in 7 NAICS codes, with these areas accounting for over 75 percent of the OCC's annual awards in fiscal year 2011 and over 80 percent of the OCC's annual awards in fiscal year 2012 (*see* Tables 3 and 4). Moreover, 8 of the same NAICS codes are in the top 10 award categories for both fiscal years. By identifying the predominate areas in which the OCC expends funds, the OMWI is able to guide our outreach and technical assistance efforts and to determine how to expand opportunities more effectively and efficiently.

Table 3



Source: FPDS-NG as of 10/2011

Table 4



Source: FPDS-NG as of 10/2012

During fiscal year 2012, the OCC had planned to gather contractor demographic data on how many minority- and women-owned businesses have capabilities in our top NAICS code categories; however, the federal database research component of this project was delayed as a result of the conversion to the System for Award Management (SAM). During fiscal year 2013, the OCC will gather data from SAM on all registered contractors with capabilities in the top 7 NAICS codes where the OCC has the greatest awards. This data will enable the OMWI to compare the OCC’s contracting award percentages for minority and women groups to the availability pool and to develop strategies around the results.

WORKFORCE DIVERSITY

4. Successes achieved and challenges faced in the OCC’s recruitment and hiring of minority and women employees.

At the end of fiscal year 2012, the OCC’s permanent workforce totaled 3,678 employees, representing a slight increase from 3,581 employees in fiscal year 2011, and remained stable over the two years for females (45.9 percent) and minorities (30.5 percent). All major EEO groups were at or near parity with the national civilian labor force (N-CLF), with the exception

of Hispanics and White females. While OCC has seen progress over the past years in the overall participation of Hispanics in our workforce, we continue to be challenged with a low participation of Hispanics in the economists and non-mission critical occupations identified as All Other Series in the chart below. In addition, OCC remains focused on the low participation rates of female bank examiners and women and minorities in senior level positions. See Table 5 (OCC Workforce Profile) below and the attached EEO-1 report (Appendix).

Table 5

OCC's Workforce Profile as of September 22, 2012

	Total	Male	Female	Asian Male	Asian Female	Black Male	Black Female	Hispanic Male	Hispanic Female	Nat Amer. Male	Nat Amer. Female	Nat Hawii. Male	Nat Hawii. Female	2+ Races Male	2+ Races Female	White Male	White Female
OCC Workforce	3678	54.1%	45.9%	3.2%	3.0%	5.4%	10.6%	3.2%	3.1%	0.5%	0.3%	0.1%	0.1%	0.5%	0.6%	41.3%	28.2%
2000 N-CLF		53.2%	46.8%	1.9%	1.7%	4.8%	5.7%	6.2%	4.5%	0.3%	0.3%	0.1%	0.1%	0.8%	0.8%	39.0%	33.7%
Bank Examiners	2526	61.1%	38.9%	2.6%	2.6%	5.1%	6.0%	3.5%	2.5%	0.6%	0.4%	0.04%	0.04%	0.4%	0.5%	49.0%	26.9%
O-CLF		57.6%	42.4%	1.9%	2.8%	4.5%	6.9%	2.2%	1.6%	0.3%	0.2%	0.0%	0.0%	0.3%	0.1%	48.3%	30.3%
Attorneys	169	56.2%	43.8%	2.4%	2.4%	3.0%	3.0%	5.3%	2.4%	0.6%	0.0%	0.0%	0.0%	0.6%	0.6%	44.4%	35.5%
O-CLF		71.3%	28.7%	1.2%	1.0%	2.0%	1.9%	2.3%	1.2%	0.1%	0.1%	0.0%	0.0%	0.3%	0.2%	65.2%	23.9%
Economists	67	68.7%	31.3%	16.4%	16.4%	1.5%	1.5%	3.0%	1.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	47.8%	11.9%
O-CLF		69.4%	30.6%	5.4%	3.7%	3.2%	2.4%	3.1%	2.0%	0.4%	0.1%	0.0%	0.0%	0.6%	0.4%	56.3%	21.6%
All Other Series	916	33.4%	66.6%	4.3%	3.3%	6.9%	25.4%	2.2%	4.8%	0.1%	0.3%	0.1%	0.2%	0.8%	0.9%	19.1%	31.5%
N-CLF		53.2%	46.8%	1.9%	1.7%	4.8%	5.7%	6.2%	4.5%	0.3%	0.3%	0.1%	0.1%	0.8%	0.8%	39.0%	33.7%

Source: MD-715 Workforce Data Tables and related trend analysis, and HR Data and Transaction Mart

Note: EEO groups in red font are below parity with relevant national and occupational CLF.

Hispanics

Hispanic employees represent a growing segment of the OCC's permanent workforce with participation increasing from 5.7 percent in fiscal year 2011, to 6.3 percent in fiscal year 2012. Hispanics are well represented in two of the agency's mission-critical occupations, bank examiners and attorneys, with participation rates that exceed their occupational civilian labor force (O-CLF) of 3.8 percent and 3.5 percent, respectively. The lower participation rate for Hispanics occurs with the economists and non-mission critical occupations identified as All

Other Series in the chart below. Given that our economists and All Other Series comprise only 26.7 percent of our total workforce, the OCC will continue to be challenged in meeting an overall N-CLF of 10.7 percent.

The OCC also made steady improvement in hiring and retaining Hispanic employees in fiscal year 2012. Hispanic attorneys (14.3 percent), bank examiners (5.6 percent), and All Other Series (14.6 percent) were hired at rates greater than their O-CLF percentages. Across all occupational groups, Hispanics separated in fiscal year 2012 at rates equal to or lower than previous years. *See* Table 6 (5-Year Trend: Hispanic Profile) below.

Table 6

5-Year Trend: Hispanic Profile

		2008	2009	2010	2011	2012
Bank Examiners 3.8% O-CLF	Hires	5.7%	10.3%	4.5%	3.4%	5.6%
	Separations	5.8%	5.0%	6.3%	5.4%	4.4%
	Wrk. Part. %	5.7%	6.1%	6.2%	5.9%	6.0%
Attorneys 3.5% O-CLF	Hires	33.3%	0.0%	20.0%	14.3%	14.3%
	Separations	0.0%	0.0%	25.0%	0.0%	0.0%
	Wrk. Part. %	8.6%	8.5%	6.9%	6.3%	7.1%
Economists 5.1% O-CLF	Hires	0.0%	20.0%	0.0%	0.0%	0.0%
	Separations	0.0%	0.0%	0.0%	0.0%	0.0%
	Wrk. Part. %	2.2%	3.8%	3.6%	4.8%	4.5%
Other Series 10.7% N-CLF	Hires	8.2%	7.5%	16.7%	3.1%	14.6%
	Separations	9.1%	14.0%	4.8%	8.9%	3.1%
	Wrk. Part. %	5.1%	4.7%	5.2%	5.0%	7.0%

Source: MD-715 Workforce Data Tables and related trend analysis, and HR Data and Transaction Mart

Note: The comparator for overall workforce participation and hires of EEO groups is the group's participation in the national civilian labor force (N-CLF). Likewise for EEO groups within specific job occupations, the comparator is that group's participation in occupations in the civilian labor force (O-CLF) for workforce participation and hires. Separation rates are compared to each group's participation in the workforce, overall and/or by occupation.

The OCC maintains ongoing relationships with minority professional organizations and colleges and universities with large populations of minority and female students. During fiscal year 2012, more than 119 students were hired through various cooperative education and student

educational employment programs such as the Hispanic Association of Colleges and Universities (HACU), Washington Internships for Native Students (WINS), National Academy of Finance (NAF), and INROADS. Of those interns hired, 14.3 percent (17) were Hispanics.

As in prior years, the OCC continued to recruit from Hispanic Serving Institutions (HSIs) as part of its entry-level bank examiner program, and sought additional sources for recruitment through the National Association of Colleges and Employers (NACE) and Association of Latin Professionals in Finance and Accounting (ALPFA). During fiscal year 2012, we recruited at the following HSIs: California State University, Long Beach; Florida International University; University of New Mexico; University of Texas, El Paso; and University of Texas, Pan American. In an effort to reach minorities and women, OCC also participated in a variety of conferences and career fairs, such as the ALPFA, Beta Alpha Psi (BAP), National Council of LaRaza, League of United Latin American Citizens (LULAC), and the Hispanic Congressional Caucus.

The OCC's Hispanic network group, HOLA (Hispanic Organization for Leadership and Advancement), provided valuable input to senior OCC managers on recruiting, retaining, and engaging Hispanic employees. HOLA also hosted a national panel entitled "*A Cinco de Mayo – Advancing Your Career: Advice from the Trenches*" as part of its career advancement/retention initiative. Panelists shared their personal stories, illustrating why and how they pursued careers with the OCC, and their experiences in preparing for and attaining higher level positions. HOLA members also participated in career fairs and conferences of Hispanic organizations as well as served as mentors to new Hispanic employees.

Female Bank Examiners

In fiscal year 2012, the OCC continued to work toward increasing the number of female bank examiners in its workforce. Over the last ten years, the OCC increased its population of female bank examiners from 35.1 percent in fiscal year 2003 to 38.8 percent in fiscal year 2012. While their participation increased slightly in fiscal year 2012, the number of female bank examiners

hired during this time declined by 5.6 percentage points. Female bank examiners were hired (36.0 percent) and are participating in the workforce at rates below their proportion in the O-CLF of 42.4 percent. This trend of lower participation exists across all race groups, except Hispanic and Native American female bank examiners.

Retention rates of female bank examiners improved slightly as separations decreased from 32.7 percent in fiscal year 2011, to 31.9 percent in fiscal year 2012. Resignations and transfers accounted for 60.0 percent of those separations, with a growing trend of retirements noted in this segment of our population. Exit survey responses cite travel requirements, job stress, pay, office morale, heavy workload, career growth, and lack of transfer/telecommuting opportunities as factors in retaining bank examiners, particularly female bank examiners.

Efforts to identify and address barriers to female bank examiner hiring and retention include collaboration between the OCC's OMWI, Human Resources, and Bank Supervision offices on our recruitment, retention and training strategic initiative. This initiative is focused on improving the efficiency and effectiveness of the recruitment, development, and training of our examiners. Targeted recruitment and retention strategies have also included:

- enhancing current recruitment sources for entry- and experienced-level female bank examiner talent;
- targeting advertisement with professional organizations for specialty skills;
- utilizing the agency's Boomerang program to invite former examiners to return to employment with the OCC;
- offering referral bonuses for successful experienced external examiner hires; and
- partnering with OCC's employee group, The Women's Network (TWN), to sponsor mentoring and networking in support of female bank examiner retention. TWN held mentoring circles on relevant topics such as "Coping with Career Challenges and OCC Culture" and "OCC Culture and Career Paths."

In addition, the OCC's annual Career Forum provided entry-level pre-commission examiners with information about bank examiner career opportunities and the Uniform Commission Examination (UCE) preparatory process. Of the 63 OCC pre-commissioned examiners who successfully passed the UCE in fiscal year 2012, 44.4 percent were female, exceeding the participation rate (38.8 percent) of female bank examiners in the workforce. *See* Table 7 (OCC 5-Year Trend: Female Bank Examiner Profile) below.

Table 7

5-Year Trend: Female Examiner Profile

		2008	2009	2010	2011	2012
Females 42.4% O-CLF	Hires	42.6%	44.5%	39.8%	41.6%	36.0%
	Separations	30.4%	34.7%	43.0%	32.7%	31.9%
	Wrk. Part. %	40.5%	41.0%	40.8%	38.7%	38.8%
Asian Females 2.8% O-CLF	Hires	0.7%	1.3%	6.8%	4.5%	2.4%
	Separations	1.4%	3.3%	1.4%	2.4%	2.9%
	Wrk. Part. %	2.3%	2.3%	2.5%	2.6%	2.6%
Black Females 6.9% O-CLF	Hires	12.1%	4.5%	2.3%	5.6%	6.8%
	Separations	6.5%	6.6%	5.6%	6.3%	5.9%
	Wrk. Part. %	6.4%	6.3%	6.2%	5.9%	6.0%
Hispanic Females 1.6% O-CLF	Hires	1.4%	5.8%	0.0%	1.1%	2.4%
	Separations	2.9%	1.7%	4.2%	3.4%	2.0%
	Wrk. Part. %	2.6%	2.9%	2.7%	2.4%	2.5%
Native American Females 0.2% O-CLF	Hires	1.4%	0.6%	0.0%	0.0%	0.0%
	Separations	0.0%	0.0%	0.7%	0.0%	0.0%
	Wrk. Part. %	0.3%	0.3%	0.3%	0.4%	0.4%
White Females 30.3% O-CLF	Hires	26.2%	31.6%	30.7%	29.2%	23.2%
	Separations	19.6%	23.1%	31.0%	20.5%	21.1%
	Wrk. Part. %	28.6%	28.9%	28.8%	26.9%	26.9%

Source: MD-715 Workforce Data Tables and related trend analysis, and HR Data and Transaction Mart

Note: For EEO groups within specific job occupations, the comparator is that group's participation in occupations in the civilian labor force (O-CLF) for workforce participation and hires. Separation rates are compared to each group's participation in the workforce, overall and/or by occupation.

Women and Minorities in Senior Level Positions

The low participation of women and minorities in senior level positions (SLP) is an area of challenge to OCC. We are in the process of studying this disparity by analyzing data trends in hiring, separations, and promotions and reviewing internal program functions for adverse impact.

The study shows that the lack of diversity within OCC higher grades begins at NB-VI (GS-14 equivalent). See Table 8 (2012 Workforce Profile – Higher Grades).

Table 8

2012 Workforce Profile – Higher Grades

FY 2012	Workforce Participation Rate	NB V (Equiv. GS-13)	NB VI (Equiv. GS-14)	NB VII (Equiv. GS-15)	NB VIII-IX (Equiv. SLP)
Female	45.9%	43.5%	37.9%	36.3%	29.2%
Minority	30.5%	33.3%	22.2%	16.4%	14.6%
Asian	6.2%	7.3%	6.7%	4.8%	0.0%
Black	16.0%	17.3%	9.7%	7.4%	12.5%
Hispanic	6.3%	6.4%	4.4%	3.8%	2.1%
Native American	0.8%	1.4%	0.7%	0.3%	0.0%
White female	28.2%	27.0%	26.4%	28.6%	25.0%
White male	41.3%	39.7%	51.4%	55.0%	60.4%
Total	3,678	1,134	1,155	311	48

Source: MD-715 Workforce Data Tables and related trend analysis, and HR Data and Transaction Mart
 Note: EEO groups in red font are below parity with their workforce participation rates.

The OCC has performed reviews of all internal employment functions, policies, procedures, practices, and conditions that might impact the hiring and promotion of females and minorities into senior positions. Although the reviews revealed little evidence of a direct correlation into the cause and effect of low participation of females and minorities in senior positions, the OCC recognizes the importance of all employee groups fully participating across all levels of the workforce and will continue to focus on this area in fiscal year 2013. The OCC's strategic initiative on leadership will focus on formalizing succession planning to support developing our leadership pipeline. This long-term initiative will encourage the participation of females and minorities in SLP by ensuring training and developmental opportunities that support a culture of

leadership, providing developmental training consistent with formal succession plans, and offering continuing learning through mentoring and coaching.

Summary

The OCC is committed to increasing the recruitment, hiring, and retention of our diverse workforce, with concerted efforts on maximizing the participation of Hispanics in our non-mission critical occupations (All Other Series), and females in our bank examiner occupation. To address these areas of challenge, we will continue to monitor and evaluate our recruiting programs, especially our College Recruitment Coordinator (CRC) Program for entry-level bank examiners, which has served as our primary recruitment/hiring pipeline. We continue to assess our recruiting programs to determine specific ways to expand our applicant pool sources, and establish more targeted relationships with professional organizations. We will also continue to enhance our retention activities for employees, and explore more effective use of mentoring through our employee network groups.

The OCC will continue to provide ongoing recruitment training to our recruiters in order to expand and broaden our pool of candidates and ensure unbiased processes in hiring decisions. We will continue to provide periodic briefings to executive and senior management on workforce trends, targeted recruitment, retention strategies, succession planning, and areas of special attention. In addition, the OCC will continue to analyze the diversity data of its recruitment (including applicant pool data for mission-critical occupations), hiring, and separation activities as required by the Equal Employment Opportunity Commission Management Directive 715.

REGULATED ENTITIES

The OCC regulates and supervises 1,971 institutions, which includes 1,351 national banks, 573 federal savings associations, and 47 federal branches and agencies of foreign banks. Their total assets are \$10.1 trillion, representing 71 percent of total U.S. commercial banking assets.

An interagency working group comprised of the financial agency OMWIs (Federal Deposit Insurance Corporation, National Credit Union Administration, the Federal Reserve Board, Consumer Finance Protection Bureau, Securities and Exchange Commission, and OCC) has been coordinating closely to develop standards for assessing the diversity policies and practices of entities regulated by each agency. The goal of this working group is to collaborate on an approach toward developing uniform standards for diversity assessments. To this end, the interagency group completed the following activities in 2012 to better inform its efforts to implement this section of Dodd-Frank:

- Held meetings with the EEOC, the OFCCP, and the Department of Justice to determine available resources for accessing employment demographic data of regulated entities;
- Held meetings with banking and industry trade representatives to discuss ideas in recognition of the wide-ranging sizes, markets, and complexities of the regulated entities;
- Held meetings with community advocacy group representatives to discuss Dodd-Frank section 342 implementation broadly; and
- Held industry, trade, and public roundtables throughout the United States, and telephone conferences with industry, trade, and state banking representatives.

The OMWI Directors participated in roundtable meetings with regulated entities, industry trade organizations, and consumer organizations in Washington, DC, Chicago, Dallas, New York City, Charlotte, and Denver that were attended by over 100 representatives. In addition, two roundtables in the form of conference calls were held to seek input from community bankers across the country. The information and suggestions gathered from these meetings have assisted the interagency group's efforts in developing standards that would promote good diversity practices while not disrupting existing, successful programs or imposing undue burdens on the financial services industry. Attendees responded to questions and shared suggestions and concerns regarding standards and implementation methods. Utilizing this input, as well as diversity best practices research information, the OMWI Directors have proposed a joint policy

statement to ensure the standards are consistent. The standards describe leading diversity practices for the financial services industry in four key areas: (1) organizational commitment; (2) workforce profile and employment practices; (3) procurement and business practices – supplier diversity; and (4) transparency of organizational diversity and inclusion.

During the spring of 2013, the OMWIs plan to publish for comment a Proposed Interagency Policy Statement Establishing Standards to Assess the Diversity Policies and Practices of All Entities Regulated by the Agencies.

Appendix

OCC's FY 2012 EEO-1 Report (Occupational Categories Profile)

Distribution by Race/Ethnicity and Gender;
Permanent Employees

Occupational Categories	Non-Hispanic or Latino																	
	TOTAL EMPLOYEES			Hispanic or Latino		White		Black or African American		Asian		Native Hawaiian or Other Pacific Islander		American Indian or Alaska Native		Two or more races		
	#	male	female	male	female	male	female	male	female	male	female	male	female	male	female	male	female	
1a. Official & Managers Exec/Senior Level (Grade 15 & Above)	#	263	176	87	4	9	152	64	14	10	6	4	0	0	0	0	0	0
	%	100.00%	66.92%	33.08%	1.52%	3.42%	57.79%	24.33%	5.32%	3.80%	2.28%	1.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1b. MID-LEVEL (GRADES 13-14)	#	51	25	26	2	2	15	17	4	5	2	1	0	0	0	1	2	0
	%	100.00%	49.02%	50.98%	3.92%	3.92%	29.41%	33.33%	7.84%	9.80%	3.92%	1.96%	0.00%	0.00%	0.00%	1.96%	3.92%	0.00%
1d. Other	#	2593	1521	1072	91	65	1195	718	137	191	72	71	0	1	15	11	11	15
	%	100.00%	58.66%	41.34%	3.51%	2.51%	46.09%	27.69%	5.28%	7.37%	2.78%	2.74%	0.00%	0.04%	0.58%	0.42%	0.42%	0.58%
1. Officials and Managers Total	#	2907	1722	1185	97	76	1362	799	155	206	80	76	0	1	15	12	13	15
	%	100.00%	59.24%	40.76%	3.34%	2.61%	46.85%	27.49%	5.33%	7.09%	2.75%	2.61%	0.00%	0.03%	0.52%	0.41%	0.45%	0.52%
2. Professionals	#	452	237	215	16	11	147	120	30	54	39	27	1	0	2	0	2	3
	%	100.00%	52.43%	47.57%	3.54%	2.43%	32.52%	26.55%	6.64%	11.95%	8.63%	5.97%	0.22%	0.00%	0.44%	0.00%	0.44%	0.66%
3. Technicians	#	4	2	2	0	0	1	0	1	2	0	0	0	0	0	0	0	0
	%	100.00%	50.00%	50.00%	0.00%	0.00%	25.00%	0.00%	25.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5. Administrative Support Workers	#	314	29	285	5	25	10	117	12	130	0	7	0	2	0	0	2	4
	%	100.00%	9.24%	90.76%	1.59%	7.96%	3.18%	37.26%	3.82%	41.40%	0.00%	2.23%	0.00%	0.64%	0.00%	0.00%	0.64%	1.27%
8. Laborers and Helpers	#	1	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	%	100.00%	100.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Workforce	#	3678	1991	1687	118	112	1521	1036	198	392	119	110	1	3	17	12	17	22
	%	100.00%	54.13 %	45.87	3.21%	3.05 %	41.35 %	28.17%	5.38 %	10.66%	3.24%	2.99 %	0.03%	0.08 %	0.46%	0.33 %	0.46%	0.60 %

