

August 30, 2016

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Attn: 1557-0334
400 7th Street, S.W., Suite 3E-218
Washington DC 20219

Subject: *Information Collection*: **Diversity Self-Assessment Template for Entities Regulated by the OCC**

This letter is in response to the Office of the Comptroller of the Currency's (OCC) 60-day notice on a *revised* information collection on the Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies (Policy Statement). The OCC solicits comment on a revised information collection, which adds Diversity Self-Assessment Template. Comments must be submitted by October 24, 2016.

The OCC invites comments on: (i) whether the collection of information is necessary; (ii) ways to enhance clarity of the information collected; and (iii) the accuracy of the OCC's burden estimate.

The OCC should **rescind** the revised information collection for the reasons below.

1. *OCC's estimate of burden is incorrect and unsupported*: The OCC projects a 33% reduction in the burden hours simply because the agency "copied & pasted" words from its policy statement into a separate document. The OCC claims that this summary document (template) will reduce the average response time from 12 hours to 8 hours. This reasoning is not supported by logic, empirical evidence, or common sense. The OCC should clearly describe how it estimates burden.
2. *OCC is sending mixed signals to the industry*: In publishing a one-size-fits-all template, the OCC creates the impression that the policy statement and template contain legal mandates that are compulsory, not voluntary. The OCC's decision to publish a uniform template is particularly bewildering considering the agency expects very few respondents – only 215 of the 1,535 nationally chartered institutions.
3. *OCC' standard template, with its binary decision framework, effectively forecloses on the possibility of better self-assessment frameworks developed by society*: When a regulator publishes a "template", by default it becomes the standard used by the industry it regulates; a form to be filled out. Unfortunately, the OCC's template reduces the multidimensional issue of workplace diversity and inclusion into an overly simplistic binary decision (YES or NO) that does not reflect the complexity and nuances of real life. A binary decision framework is the *wrong* approach.

While I recognize the OCC systematically ignores all public comments and does whatever it wants, I nevertheless appreciate the opportunity to comment. I wish the agency the best of luck.

Sincerely,

Sandra A. Holly
Hyattsville, MD