



2019
Voluntary Credit Union
Diversity Self-Assessment
Results

NATIONAL CREDIT UNION ADMINISTRATION

Office of Minority and Women Inclusion



Table of Contents

- Executive Summary..... 1**
- Introduction 2**
- Employment Profile of Federally Insured Credit Unions 3**
- Profile of Credit Unions Submitting Self-Assessments 5**
- Summary of 2019 Submission Results..... 8**
- Consecutive Year Submission Results 9**
- Aggregate Results of 2019 Self-Assessments by Individual Standard..... 10**
 - Standard 1 – Leadership/Organizational Commitment to Diversity and Inclusion..... 10
 - Standard 2 – Proactive Implementation of Employment Practices that Expand Outreach Efforts to Diverse Individuals..... 11
 - Standard 3 – Consideration of Supplier Diversity in Procurement and Business Practices 13
 - Standard 4 – Promotion of Transparency of Diversity and Inclusion Practices..... 15
 - Standard 5 – Monitoring and Assessment of Diversity Policy and Practices 17
- Summary 18**

Executive Summary

The *Credit Union Diversity Self-Assessment* outlines best practices for creating a more diverse and inclusive credit union, and increasingly, it is being used by credit unions to assess and monitor their diversity-related efforts. In 2019, 118 credit unions (76 federal and 42 state chartered, federally insured) submitted self-assessments, a 46 percent increase over the 81 self-assessments submitted in 2018. The credit unions varied in the number of employees and asset size. The aggregate number of employees working at these credit unions represents 6 percent of employees at all federally insured credit unions. Asset sizes ranged from \$2 million to \$9 billion with 78 of the 118 credit unions, or 66 percent, reporting \$100 million or more in assets.

The self-assessment categorizes the best practices under five major standards:

1. Leadership/Organizational commitment to diversity and inclusion;
2. Proactive implementation of employment practices that expand outreach efforts to diverse individuals;
3. Consideration of supplier diversity in procurement and business practices;
4. Promotion of transparency of diversity and inclusion practices; and
5. Monitoring and assessment of diversity policy and practices.

Approximately 56 percent of responding credit unions reported a leadership and organizational commitment to diversity, while 48 percent noted taking steps to implement employment practices to demonstrate that commitment. Twenty-nine percent of the reporting credit unions have been monitoring and assessing their diversity policy and practices. As in previous years, supplier diversity and transparency of diversity and inclusion practices remain areas where few of the reporting credit unions have established solid business practices.

The business case for diversity in credit unions is simple: it drives growth and improves credit union results when employees, board members, and managers reflect the community it serves. Research shows diversity leads to better service, greater innovation, better solutions, increased membership, and an enriched member and employee experience. These things make credit unions strong and sustainable, which ultimately leads to greater strength for the entire credit union system.

Diversity and inclusion drive positive results in organizations, including credit unions, by contributing to innovation, productivity, talent acquisition and retention, employee engagement, and more. The NCUA encourages credit unions to implement policies and practices to improve their levels of diversity and inclusion. Conducting and sharing their self-assessment results helps credit unions identify challenges and opportunities, and assists the NCUA in monitoring and assessing levels of diversity and inclusion within the credit union system.

Introduction

The NCUA is committed to supporting diversity and inclusion throughout the credit union system and seeks to stay abreast of trends and progress made in credit union diversity-related activities. Since 2016, the NCUA has annually encouraged credit unions to share their diversity and inclusion successes and challenges by completing and submitting the *Credit Union Diversity Self-Assessment* (CUDSA). The CUDSA is *voluntary*; it is **not** part of the NCUA or state regulatory examination processes and it has no impact on a credit union's CAMEL rating. Simply stated, there are many benefits and no risks in sharing your credit union's diversity and inclusion journey with us.

Available year-round, the CUDSA contains proven best practices and serves as a tool to assess and guide a credit union's diversity efforts. A credit union may start the CUDSA any time during the year, save it, and then complete it later. This allows credit unions to use the CUDSA during monthly board meetings or periodic strategic planning sessions, and complete it incrementally. In using it this way, the CUDSA becomes a guide to improved diversity and inclusion health within a credit union and beyond. Although available year-round, the submission due date of the annual CUDSA is January 15 of the following year.

The Credit Union Diversity Self-Assessment contains best practices for credit union diversity. Access the Self-Assessment at www.cudiversity.ncua.gov

For four years, the NCUA has collected diversity self-assessments from credit unions. Pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, credit unions and other financial institutions, especially those with 100 or more employees, are encouraged to conduct annual self-assessments of diversity and inclusion practices and policies related to workforce, workplace, and contracting activities. To facilitate the self-assessment process, the financial institution regulatory agencies¹ collectively established the diversity standards set forth in the 2015 *Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices*. The agencies grouped the joint standards into these five areas, or sets of standards:

¹ Office of the Comptroller of the Currency; Board of Governors of the Federal Reserve System; Federal Deposit Insurance Corporation; Consumer Financial Protection Bureau; Securities and Exchange Commission; and the National Credit Union Administration.

1. Leadership/Organizational commitment to diversity and inclusion;
2. Proactive implementation of employment practices that expand outreach efforts to diverse individuals;
3. Consideration of supplier diversity in procurement and business practices;
4. Promotion of transparency of diversity and inclusion practices; and
5. Monitoring and assessment of diversity policy and practices.

The standards provide financial institutions with a framework to create or strengthen its diversity policies and practices. Using these joint standards, the NCUA created the *CUDSA* tool that provides guidance for advancing diversity and inclusion in credit unions. It also highlights best practices for demonstrating a commitment to diversity and inclusion. Credit unions began conducting and voluntarily submitting self-assessments to the NCUA's Office of Minority and Women Inclusion (OMWI) in 2016.

The NCUA uses the aggregated self-assessment data to monitor progress and trends in credit union diversity-related activities. OMWI shares the results anonymously, primarily in the NCUA's annual *OMWI Report to Congress* and in this annual report of the self-assessment results. The annual reports of the self-assessment results are located [here](#) on the NCUA website.

The self-assessment data also informs the NCUA of areas where additional guidance could be useful. When appropriate, the NCUA issues such guidance to assist credit unions with their diversity efforts. In 2018, the NCUA issued a *Credit Union Guide to Supplier Diversity (CUDSA)* after identifying that many credit unions reported low levels of engagement in this area.

Employment Profile of Federally Insured Credit Unions

As of December 31, 2019, there were 5,236 federally insured credit unions, consisting of 3,283 federally chartered credit unions and 1,953 federally insured state chartered credit unions. Using the December 31, 2019 Call Report data, Figure 1 shows the number of credit unions in each employment level.

Employment at federally insured credit unions increased to 323,815 at year-end 2019 from 312,771 at year-end 2018. As of December 31, 2019, 4,082 credit unions, representing 78 percent of all federally insured credit unions, employed fewer than 50 personnel. Although only 689 credit unions, or 13 percent, had 101 or more total employees, they collectively employed 76 percent of the 323,815 employees working at all federally insured credit unions.

Federally Insured Credit Union Employees

Employees	2019 Number of Credit Unions	Percent of Total Credit Unions	2019 Number of Employees	Percent of Total Employees
Fewer than 50 employees	4,082	78.0%	46,143	14.3%
50 to 100 employees	465	8.9%	33,025	10.2%
101 to 500 employees	583	11.1%	126,436	39.0%
501 or more employees	106	2.0%	118,211	36.5%
TOTAL	5,236	100%	323,815	100%

Source: NCUA Credit Union Call Data as of December 31, 2019

Figure 1

Figure 2 provides a snapshot of the gender diversity of credit union senior managers as of December 31, 2019. A slight majority of credit union managers and chief executive officers are women; however, women managers and CEOs outnumber men *only* in credit unions with less than \$100 million in assets. Men represent the majority of the CEOs managing credit unions with \$100 million or more in assets.

Gender of Credit Union Managers and CEOs

Gender	All Credit Unions		Less than \$100 million in Assets		\$100 – \$500 million in Assets		\$500 million – \$1 billion in Assets		Over \$1 billion in Assets	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Representation (in percent)	51.4%	48.6%	63.7%	36.3%	28.0%	72.0%	16.2%	83.8%	14.5%	85.5%
Average Net Worth Ratio	14.7%	12.9%	15.1%	14.3%	12.2%	11.5%	11.4%	11.2%	11.7%	11.2%
Average CAMEL	2.0	2.0	2.1	2.2	1.9	1.9	1.8	1.7	1.6	1.5
Number of Credit Unions	2,693	2,543	2,320	1,321	285	733	40	207	48	282

Source: NCUA Credit Union Call Data as of December 31, 2019

Figure 2

Profile of Credit Unions Submitting Self-Assessments

In 2019, 118 credit unions (76 federal credit unions and 42 federally insured state chartered credit unions) submitted self-assessments. This represents a 46 percent increase over the 81 self-assessments submitted in 2018. Since 2016, approximately 200 credit unions have submitted self-assessments, with seven credit unions having submitted assessments for each of the four reporting years. Figure 3 provides a historical breakdown of submitters by asset size.

Submitter Profile – Asset Size and Submission Year

Asset Size	2016		2017		2018		2019	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Less than \$10 million	5	14%	3	5%	7	9%	6	5%
\$10 million to less than \$50 million	0	0%	6	9%	13	16%	24	20%
\$50 million to less than \$100 million	5	14%	7	11%	3	4%	10	9%
\$100 million to less than \$500 million	7	20%	18	28%	23	28%	25	21%
\$500 million to less than \$1 billion	8	23%	18	28%	20	25%	21	18%
More than \$1 billion	10	29%	12	19%	15	18%	32	27%
Total	35	100%	64	100%	81	100%	118	100%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 3

The credit unions varied in number of employees and asset size. The aggregate number of employees working at these credit unions represents 6.4 percent of employees at all federally insured credit unions. In 2019, 8.2 percent of credit unions with between 101 and 500 employees, and 10.4 percent of credit unions with 501 or more employees submitted a self-assessment. Asset sizes ranged from \$2 million to \$9 billion with 78 of the 118 credit unions, or 66 percent, reporting \$100 million or more in assets. Data on these credit unions, shown in Figure 4, is based on the December 31, 2019 Call Report.

2019 Self-Assessment Submitter Profile – Employees and Asset Range

Total Employees	Credit Union Count	Asset Range	Aggregate Employees
0 – 49	45	\$2M – \$139M	719
50 – 100	14	\$40M – \$1B	1,046
101 – 500	48	\$343M – \$9B	11,326
More than 500	11	\$2B – \$6B	7,641
Total	118		20,732

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 4

The 118 credit unions that submitted a self-assessment in 2019 represent only 2.3 percent of all credit unions as of December 31, 2019. While the NCUA encourages all credit unions to use the *CUDSA* as a tool to create a new diversity program, or enhance an existing one, it is reasonable to expect a limited diversity profile from small credit unions with few or no employees.

In 2018, the NCUA modified the *CUDSA* to collect workforce data by gender, race, and national origin. Of credit unions submitting a *CUDSA* in 2019, approximately 80 percent provided some of this data. As shown in Figure 5, for credit unions reporting gender, approximately 70 percent of the employees at these credit unions are women, 60 percent of the management employees are women, and 36 percent of the board members are women.

For those credit unions sharing workforce data in 2019 broken down by race, they report that 65 percent of all employees and 73 percent of management employees and board members are White. Approximately 15 percent of all employees are Hispanic or Latino, and 12 percent are Black. Hispanics or Latinos rank second to Whites for management employees at 11 percent, followed by Blacks, who represent 9 percent of management employees. These credit unions report that 14 percent of the board members are Black and 5 percent are Hispanic or Latino.

Native Hawaiians or other Pacific Islanders are the least represented population in this group with American Indian or Alaska Natives being the second least represented group across all categories. Of the credit unions sharing workforce profile data, race/national origin was not identified for 23.6 percent of all employees, 20 percent of management employees, and 21.4 percent of board members.

2019 Self-Assessment Submitter Workforce Profile

	All Employees		Management Employees ONLY		Board Members ONLY	
	Percent	Count	Percent	Count	Percent	Count
Women	69.7%	10,281	60.3%	1,819	35.8%	201
Men	30.3%	4,464	39.7%	1,199	64.2%	361
Gender not identified (% of total)		1,109		25		23
American Indian or Alaska Native	0.7%	87	0.5%	13	0.9%	4
Asian	4.8%	576	4.6%	112	1.7%	8
Black or African American	11.7%	1,421	9.0%	219	13.7%	63
Native Hawaiian or Other Pacific Islander	0.6%	73	0.3%	7	0.2%	1
White	64.5%	7,809	73.0%	1,778	73.3%	337
Two or more races	1.9%	231	1.2%	29	0.2%	1
Hispanic or Latino ONLY	14.6%	1,768	11.3%	274	5.2%	24
Unspecified/Not Known	1.2%	142	0.1%	3	4.8%	22
Race/National Origin Not Identified (total)		3,747		608		125
Total		15,854		3,043		585

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 5

Summary of 2019 Submission Results

Figure 6 summarizes self-assessment responses from 2016 through 2019 for each of the five broad standards assessing diversity within regulated entities. Each of the standards contain several specific components. For example, Standard 3 contains 13 specific components related to the credit union’s consideration of supplier diversity in procurement and business practices. The specific components assess whether the credit union is implementing diversity and inclusion best practices within that standard, such as establishing a written supplier diversity policy that provides opportunities for minority and women-owned businesses, or whether the credit union has leadership support to incorporate supplier diversity into business planning cycles or initiatives.

Fifty-six percent of responding credit unions reported a leadership and organizational commitment to diversity and 48 percent reported taking steps to implement employment practices to demonstrate that commitment. Twenty-nine percent reported monitoring and assessing their diversity policy and practices. As in previous years, supplier diversity and transparency of diversity and inclusion practices remain areas where few of the reporting credit unions have established solid business practices.

Average Responses for Broad Standards

Diversity Self-Assessment Standard	Affirmative Response				Negative Response			
	2016	2017	2018	2019	2016	2017	2018	2019
	35 CUs	64 CUs	81 CUs	118 CUs	35 CUs	64 CUs	81 CUs	118 CUs
1. Leadership/Organizational Commitment to Diversity and Inclusion	54%	46%	57%	56%	46%	54%	43%	44%
2. Proactive Implementation of Employment Practices that Expand Outreach Efforts to Diverse Individuals	53%	54%	47%	48%	47%	46%	53%	52%
3. Consideration of Supplier Diversity in Procurement and Business Practices	7%	7%	5%	8%	93%	93%	95%	92%
4. Promotion of Transparency of Diversity and Inclusion Practices	22%	20%	14%	17%	78%	80%	86%	83%
5. Monitoring and Assessment of Diversity Policy and Practices	22%	24%	30%	29%	78%	76%	70%	71%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 6

Consecutive Year Submission Results

Since the CUDSA launched in 2016, 200 unique credit unions have submitted a self-assessment to the NCUA's OMWI for at least one year. Historically, credit unions that have submitted the self-assessment more than once show marked improvement from year to year.

More than half (44) of the 81 credit unions submitting a self-assessment in 2018, also submitted a self-assessment in 2019. The asset range for these credit unions was between \$2 million to just under \$9 billion. Collectively, these credit unions employed approximately 8,300 individuals ranging from two to 907 employees each.

As indicated in Figure 6, these 44 credit unions reported year-over-year improvement in all of the five broad standards and reported higher affirmative responses than credit unions that did not report in consecutive years. This suggests these credit unions are actively working on diversity and inclusion, and regularly monitoring and assessing their efforts.

Credit Unions Reporting in 2018 and 2019 (44 Credit Unions)

Diversity Self-Assessment Standard	Affirmative Responses		Negative Responses	
	2018	2019	2018	2019
1. Leadership/Organizational Commitment to Diversity and Inclusion	62%	66%	38%	34%
2. Proactive Implementation of Employment Practices that Expand Outreach Efforts to Diverse Individuals	53%	56%	47%	44%
3. Consideration of Supplier Diversity in Procurement and Business Practices	6%	9%	94%	91%
4. Promotion of Transparency of Diversity and Inclusion Practices	19%	22%	81%	78%
5. Monitoring and Assessment of Diversity Policy and Practices	39%	41%	61%	59%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 7

Seven credit unions submitted a voluntary self-assessment in each of the four years the NCUA has collected them. The results, shown in Figure 8, indicate progressive improvement and higher levels of engagement in all assessed areas from 2016 to 2019.

Credit Unions Reporting in Consecutive Years (2016–2019) (7 Credit Unions)

Diversity Self-Assessment Standard	Affirmative Responses				Negative Responses			
	2016	2017	2018	2019	2016	2017	2018	2019
1. Leadership/Organizational Commitment to Diversity and Inclusion	71%	77%	79%	80%	29%	23%	21%	20%
2. Proactive Implementation of Employment Practices that Expand Outreach Efforts to Diverse Individuals	64%	81%	90%	80%	36%	19%	10%	20%
3. Consideration of Supplier Diversity in Procurement and Business Practices	9%	7%	11%	12%	91%	93%	89%	88%
4. Promotion of Transparency of Diversity and Inclusion Practices	25%	33%	35%	33%	75%	67%	65%	67%
5. Monitoring and Assessment of Diversity Policy and Practices	39%	61%	75%	79%	61%	39%	25%	21%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 8

Aggregate Results of 2019 Self-Assessments by Individual Standard

The aggregate results of the 2019 CUDSA submissions are summarized below by each individual standard. It is important to note that these results represent only a small portion of existing credit unions and are not representative of the entire credit union system.

Standard 1 – Leadership/Organizational Commitment to Diversity and Inclusion

The foundation of most successful diversity and inclusion programs is based not only on an organizational commitment to diversity and inclusion, but also on leadership that promotes those values in employment and contracting, while fostering an organizational culture that embraces them.

As in previous years, a majority of the responding credit unions report a strong leadership and organizational commitment to diversity and inclusion. Eighty-three percent of these credit unions are taking proactive steps to include a diverse pool of candidates when hiring, recruiting, retaining, and promoting employees, and 68 percent are taking similar steps in the selection of board member candidates and senior management.

Most of the reporting credit unions have senior-level officials overseeing their diversity and inclusion strategies and initiatives (60 percent); include diversity and inclusion considerations

in their strategic plans for employment actions (68 percent); and regularly conduct training and provide educational opportunities on diversity and inclusion (61 percent).

Fewer of the reporting credit unions include diversity and inclusion considerations in their strategic plans for contracting with vendors (36 percent); provide regular progress reports on their diversity and inclusion efforts to credit union leadership (27 percent); or have a written diversity and inclusion policy approved by senior leadership (42 percent).

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Has a written diversity and inclusion policy approved by senior leadership, including the board of directors and senior management.	42%	58%
2. Has a senior-level official with knowledge of and experience in diversity and inclusion policies and practices to oversee our diversity and inclusion strategies and initiatives.	60%	40%
3. Regularly conducts training and provides educational opportunities on equal employment opportunity and on diversity and inclusion.	61%	39%
4. Takes proactive steps to include a diverse pool of women and minorities or other diverse individual candidates for:		
a. Hiring, recruiting, retention, or promotion of employees.	83%	17%
b. Selection of board member candidates and senior management.	68%	32%
5. Includes diversity and inclusion considerations in our strategic plan for recruiting, hiring, retention, and/or promotion of our workforce.	68%	32%
6. Includes diversity and inclusion considerations in our strategic plan in contracting with vendors.	36%	64%
7. Provides regular (such as quarterly) progress reports on diversity and inclusion efforts to our board of directors or senior management.	27%	73%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 9

Standard 2 – Proactive Implementation of Employment Practices that Expand Outreach Efforts to Diverse Individuals

These standards measure a credit union’s efforts to identify and communicate employment opportunities to diverse candidates, create a culture that values the contributions of all employees, and hold management accountable for diversity and inclusion.

Approximately 71 percent of the credit unions reporting in 2019 had policies and practices in place to ensure equal employment opportunities for employees and applicants. Many also reported having policies and practices that create or foster diverse applicant pools for employment opportunities:

- Fifty-three percent conducted outreach to minority, women, and other diverse individuals;

- Forty-two percent conducted outreach to educational institutions serving these groups; and
- Fifty-six percent participated in conferences, workshops, and other events that attract diverse individuals to inform them of employment and promotion opportunities.

Thirty-six percent of the responding credit unions communicate employment opportunities through media targeting diverse populations and 47 percent cultivate relationships with professional organizations or educational institutions that primarily serve these populations.

To ensure their diversity programs are having the intended results, 47 percent of reporting credit unions regularly evaluated their programs and identified areas for future improvement. Approximately 55 percent used analytical tools to assess, measure, and track their workforce diversity, and 44 percent used these tools to monitor the inclusiveness of their employment practices.

Effective diversity programs charge management with reinforcing behaviors and establishing or maintaining a culture that embraces diversity and inclusion. They also hold management accountable for effectively leading these efforts. Thirty-two percent of the responding credit unions report holding management accountable for diversity and inclusion efforts.

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Implements policies and practices to ensure equal employment opportunities for employees and applicants for employment.	71%	29%
2. Implements policies and practices that create or foster diverse applicant pools for employment opportunities. These may include:		
a. Conducting outreach to minority, women, or other diverse individuals. ²	53%	47%
b. Conducting outreach to educational institutions serving significant or predominately minority, women, or other diverse student populations.	42%	58%
c. Participating in conferences, workshops, and other events that attract minorities, women, or other diverse individuals to inform them of employment and promotion opportunities.	56%	44%
3. Communicates employment opportunities through media reaching diverse populations, including publications or professional organizations and educational institutions predominantly serving minority, women, or other diverse populations.	36%	64%
4. Cultivates relationships with professional organizations or educational institutions that primarily serve minority, women, or other diverse individuals or organizations.	47%	53%
5. Evaluates our diversity and inclusion programs regularly, and identifies areas for future improvement.	47%	53%
6. Uses analytical tools, including quantitative and qualitative data, to assess, measure, and track:		
a. Our workforce diversity at all levels, including supervisory and executive ranks, by race, ethnicity, gender, or other diverse categories.	55%	45%
b. The inclusiveness of our employment practices for hiring, promotion, career development, internships, or retention, by ethnicity, gender, or other diverse category.	44%	56%
7. Holds management accountable for diversity and inclusion efforts, for example by ensuring these efforts align with business strategies or individual performance plans.	32%	68%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 10

Standard 3 – Consideration of Supplier Diversity in Procurement and Business Practices

Supplier diversity is the practice of intentionally including a diverse supplier pool when procuring goods and services for a business or organization. Diverse suppliers are generally defined as small, women-owned, minority-owned, or veteran-owned businesses, or businesses owned by individuals from other groups that have been historically underrepresented, such as persons with disabilities or individuals from the lesbian, bisexual, gay, transgender, and queer community.

² “Other diverse individuals or organizations” refers to those identified in your own established diversity and inclusion policies, which could encompass disabled persons, veterans, millennials, or lesbian/gay/bisexual/transgender individuals as examples.

Credit unions are encouraged to create and implement supplier diversity policies and practices to expand outreach for contracting opportunities with minority and women-owned businesses. This involves providing opportunities for diverse businesses to bid on contracts and informing them on how to do business with the credit union. The goal is to develop a competitive advantage by having a broad selection of available and diverse suppliers to choose from when considering factors such as price, quality, attention to detail, and future relationship-building.

As in prior years, few of the reporting credit unions report engagement in this area. This may be due, in part, to the vast range of procurement needs of the responding credit unions. Smaller credit unions with minimal procurement needs may simply fill them through the local office supply store or through online purchases, and thus, may be unable to determine whether the supplier meets the definition of “diverse.” Moreover, smaller credit unions generally do not have enough procurement needs to justify a formal supplier diversity program. Other credit unions receive significant sponsor support, thereby eliminating the need for the credit union to establish its own supplier diversity program.

In 2019, eight percent of the reporting credit unions had a written supplier diversity policy that provided opportunities for minority- and women-owned businesses to bid on contracts. Twenty-nine percent had leadership support to incorporate supplier diversity into business planning cycles or initiatives. Two percent had an established policy to solicit bids from a certain number or percentage of diverse businesses and six percent reported outreach efforts to inform diverse suppliers of contracting opportunities and how to do business with the credit union.

Regarding the use of metrics to identify a baseline and track supplier diversity, 21 percent track the amount spent procuring and contracting for goods and services, and three percent track the amount spent annually with minority- and women-owned businesses. Four percent track the availability of relevant minority- and women-owned businesses to compete in their contracting opportunities; one percent track the percentage of dollars awarded to diverse businesses by race, ethnicity, and gender as compared to total contract dollars awarded for the calendar year; and three percent track metric changes over time.

Eleven percent of reporting credit unions indicated they participated in events that attracted minority- and women-owned businesses to inform them of contracting opportunities. However, 94 percent reported they did not maintain a listing of qualified minority- and women-owned businesses that could bid on upcoming contracting opportunities. Three percent reported having an ongoing process to publicize their contracting opportunities and three percent encouraged prime contractors to use minority- and women-owned business subcontractors by incorporating this objective in their business contracts.

The recently published *Credit Union Guide to Supplier Diversity* provides guidance on how to establish or enhance a supplier diversity program.

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Has a written supplier diversity policy that provides opportunities for minority- and women-owned businesses to bid to deliver business goods and services to us.	8%	92%
2. Has leadership support to incorporate supplier diversity into business planning cycles or initiatives.	29%	71%
3. Has an established policy to solicit bids from a certain number or percentage of qualified minority- and women-owned businesses.	2%	98%
4. Conducts targeted outreach specifically to inform minority- and women-owned businesses or affinity groups representing these constituencies of contracting opportunities and how to do business with us.	6%	94%
5. Uses metrics to identify a baseline and track:		
a. The total amount we spend annually buying and contracting goods and services.	21%	79%
b. The availability of relevant minority- and women-owned businesses to compete in our contracting opportunities.	4%	96%
c. The amount we spend with minority- and women-owned businesses.	3%	97%
d. The percentage of contract dollars awarded to minority- and women-owned businesses by race, ethnicity, and gender as compared to total contract dollars awarded for the calendar year.	1%	99%
e. The changes related to the above items over time.	3%	97%
6. Implements practices that promote a diverse supplier pool, which may include:		
a. Participation in conferences, workshops, and other events that attract minority- and women-owned businesses to inform them of our contracting opportunities.	11%	89%
b. Maintaining a listing of qualified minority- and women-owned businesses that may bid on upcoming contracting opportunities.	6%	94%
c. Having an ongoing process to publicize our contracting opportunities.	3%	97%
7. Encouraging prime contractors to use minority- and women-owned subcontractors by incorporating this objective in their business contracts.	3%	97%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 11

Standard 4 – Promotion of Transparency of Diversity and Inclusion Practices

This set of standards relates to transparency of diversity and inclusion efforts, which represent a deep level of commitment. Credit unions are encouraged to be transparent by sharing their diversity and inclusion efforts, including their goals and accomplishments. Publicly communicating plans for achieving diversity and inclusion informs a broad constituency of current and potential members, employees, suppliers, as well as the public, about the credit union's efforts to promote diversity and inclusion. Publishing this information has the potential of opening access to a broader market and attracting diverse groups, and it illustrates ongoing progress in meeting a credit union's diversity and inclusion objectives.

Transparency does *not* require sharing confidential or proprietary information. Credit unions can communicate information about their efforts through normal business methods, such as displaying information on their website, in promotional material, and in annual reports to members.

The results for this area of the self-assessment reveal that even the reporting credit unions with active diversity and inclusion programs are not actively publicizing their efforts. In 2019, reporting credit unions indicated that most do not periodically compile information suitable for publication about efforts to enhance their diversity and inclusion. In 2019, only:

- Thirty-one percent published demographic information on workforce composition;
- Two percent published demographic information on supplier diversity;
- Eighteen percent published demographic information on board members and other officials;
- Twenty-one percent published other information related to diversity and inclusion efforts; and
- Twenty-five percent published information on sponsorships or partnerships with diverse organizations.

In 2019, only 28 percent of reporting credit unions made public their policy or commitment to diversity and inclusion in the workforce, and only eight percent publicly shared their diversity and inclusion strategic plan. Four percent made their policy on their commitment to supplier diversity public; and only nine percent publicized their efforts and progress toward achieving diversity and inclusion in their workforce and contracting activities.

Forty-four percent of the 118 credit unions reporting in 2019 publicized opportunities that promoted diversity and inclusion in their employment and internship opportunities. Most (95 percent) did not publicize opportunities that promoted diversity and inclusion in their contracting opportunities. One quarter publicized opportunities that promoted mentorship or development programs for employees, and three percent publicized opportunities that promoted diversity and inclusion in developmental programs for potential contractors.

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Periodically publishes information about our efforts to enhance diversity and inclusion, which may include:		
a. Demographic information on workforce composition (such as that found on an annual EEOC report.)	31%	69%
b. Demographic information on supplier diversity (contracting activities.)	2%	98%
c. Demographic information on the board members and other officials.	18%	82%
d. Information on sponsorships or partnerships with diverse organizations.	25%	75%
e. Other information on our diversity and inclusion efforts.	21%	79%
2. Makes the following information public:		
a. Our diversity and inclusion strategic plan.	8%	92%
b. Our policy on the credit union's commitment to diversity and inclusion in the workforce.	28%	72%
c. Our policy on the credit union's commitment to diversity and inclusion to supplier diversity.	4%	96%
d. Our efforts and progress toward achieving diversity and inclusion in our workforce and contracting activities.	9%	91%
3. Publicizes opportunities that promote diversity and inclusion, which may include:		
a. Employment and internship opportunities.	44%	56%
b. Contracting opportunities.	5%	95%
c. Mentorship or developmental programs for employees.	25%	75%
d. Developmental programs for potential contractors.	3%	97%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 12

Standard 5 – Monitoring and Assessment of Diversity Policy and Practices

The fifth set of diversity standards relates to monitoring and assessing diversity and inclusion policies and practices. Half of the reporting credit unions in 2019 conducted annual self-assessments or evaluations of their diversity policies and practices, and 39 percent reported modifying their policies and practices based on these assessment results. Only 9 percent of reporting credit unions published information about assessing or monitoring diversity policies and practices and 18 percent completed and submitted the CUDSA form to the NCUA on an annual basis.

In a manner reflective of our size and other characteristics, our credit union:	Yes	No
1. Conducts a self-assessment or evaluation of our diversity policies and practices annually.	50%	50%
2. Modifies our diversity policies and practices based on the results of the self-assessment or evaluation of our diversity policies and practices.	39%	61%
3. Provides information pertaining to the self-assessment or evaluation of our diversity policies and practices to the NCUA's OMWI director annually.	18%	82%
4. Publishes information pertaining to our assessment of our diversity policies and practices.	9%	91%

Source: NCUA Credit Union Self-Assessment Data as of January 15, 2020

Figure 13

Summary

The year 2019 marks the fourth consecutive year the NCUA has collected diversity data from credit unions via the voluntary CUDSA. Approximately 200 unique credit unions have submitted a self-assessment to the NCUA's OMWI for at least one of those four years. It is important, however, to note that the credit unions submitting self-assessments only represent a small portion of existing credit unions; thus, the results presented in this report are not representative of the entire credit union industry.

In 2019, CUDSA submissions increased by 46 percent, with 118 credit unions submitting a self-assessment. A majority (56 percent) of these credit unions reported a leadership and organizational commitment to diversity, and 48 percent reported taking steps to implement employment practices to demonstrate that commitment. Twenty-nine percent of the reporting credit unions monitored and assessed their diversity policies and practices. As in previous years, supplier diversity and transparency of diversity and inclusion practices remain areas where few of the reporting credit unions have established solid business practices.

Historically, credit unions that have submitted the self-assessment more than once show marked improvement from year-to-year. Forty-four credit unions submitted self-assessments in both 2018 and 2019. This group of credit unions showed improvement in all of the five broad standards, suggesting that these credit unions are actively working on diversity and inclusion and the CUDSA is helping them focus on and improve their efforts.

The NCUA encourages all credit unions to routinely monitor and evaluate performance related to their diversity policies and established practices, and to disclose, whenever appropriate, diversity policies, practices, and related information to both the NCUA and the public. The NCUA recommends credit unions use the [CUDSA](#), which contains diversity best practices, as a principal tool to establish a diversity and inclusion roadmap for themselves.

Whether through one standard or all five of them, credit unions can use the CUDSA to work on various aspects of their diversity and inclusion policies. Along the way, they can extract benefits

as described in this report. Ultimately, completing and submitting a CUDSA to the NCUA annually can serve as a useful exercise in self-regulating and directing diversity and inclusion efforts.

The NCUA now accepts self-assessments year-round. The cut-off date for annual submissions is January 15 of the following year.

Please direct questions about the annual, voluntary CUDSA, or this report, to the NCUA's Office of Minority and Women Inclusion (OMWI) at omwimail@ncua.gov.