



**Legal Disclaimer:** The following is a draft of a sample self-assessment a credit union might use to voluntarily submit its diversity policies and practices. The effective date of the information collection will be announced in the Federal Register following Office of Management and Budget approval. Consistent with requirements under the Paperwork Reduction Act, NCUA is soliciting public comments on the information collection. Comments are due on or before August 10, 2015. See 80 Fed. Reg. 33016, 33021 (June 10, 2015).

# Voluntary, Sample Credit Union Self-Assessment Checklist

## Some Best Practices for Demonstrating Diversity & Inclusion

Complementary to the Interagency Policy Statement Establishing Joint Standards for Assessing Diversity Policies and Practices, NCUA is providing credit unions with the following example of a self-assessment checklist showcasing some best practices for demonstrating diversity and inclusion.

NCUA encourages credit unions, especially ones with over 100 employees, to conduct a self-assessment to demonstrate a commitment to diversity and inclusion in the workforce and in contracting activities. The credit union's human resources office may be best-positioned to review and complete the checklist, with input from the credit union's contracting staff. NCUA appreciates that some credit unions, especially smaller ones, may not find the best practices relevant or applicable and, accordingly, completion of this checklist may not be appropriate.

Please consider the following key points:

- (1) This self-assessment is voluntary, and is neither mandatory nor required by law. We encourage credit unions to review the best practices and consider completing the checklist if the questions are applicable.
- (2) NCUA examiners will not examine your credit union on whether you complete the self-assessment or on the checklist information. This is outside the scope of the examination process.
- (3) For those credit unions that conduct self-assessments and voluntarily submit this information to NCUA, we will use the information in an aggregate form, for example in an annual report to Congress. NCUA only would use the information in the aggregate, and would not name any specific credit union in the report, unless the credit union explicitly consents to this in writing.
- (4) NCUA believes credit unions generally develop and implement successful diversity policies and practices, gradually, over a period of time. We do not expect participating credit unions to implement every one of the best practices. Some credit unions, especially those with more than 100 employees, can use information they gain from conducting self-assessments to start or strengthen efforts to promote diversity and inclusion.



## 1. Does My Credit Union’s Leadership Make an Organizational Commitment to Diversity and Inclusion?

Credit unions with successful diversity policies and practices generally begin at the top, with leadership that demonstrates its commitment by promoting diversity and inclusion in both employment and contracting and by fostering an organizational culture that embraces diversity and inclusion. This leadership includes the board of directors, senior officials, and staff managing the daily operations. Here are some examples of efforts that demonstrate an organizational commitment to diversity and inclusion.

Does my credit union:	Yes	No
1. Have a written diversity and inclusion policy approved by senior leadership, which includes the board of directors and senior management?		
2. Have a senior level official to oversee our diversity and inclusion strategies and initiatives, preferably an individual with knowledge of and experience in diversity and inclusion policies and practices?		
3. Take proactive steps to include a diverse pool of candidates, including women and minorities or other diverse individuals for:		
a. Hiring, recruiting, retention, or promotion?		
b. Selection of board member candidates, senior management, or other senior leadership positions?		
4. Include diversity and inclusion considerations as an important part of our strategic plan for recruiting, hiring, retention, or promotion of our workforce?		
5. Include diversity and inclusion considerations as an important part of our strategic plan in contracting with vendors?		
6. Provide periodic, such as quarterly, progress reports on diversity and inclusion efforts to our board of directors or senior management?		
7. Conduct training or provide educational opportunities on equal employment opportunity and diversity at least annually?		



## 2. Does My Credit Union Proactively Implement Employment Practices that Expand Outreach Efforts to Minorities, Women, or Other Diverse Groups?

Credit unions that promote the fair inclusion of minorities, women, or other diverse individuals in their workforces proactively implement various initiatives to expand the applicant pool to include diverse candidates, create a culture that values the contribution of all employees, and encourage a focus on these objectives when evaluating the performance of managers. The following questions identify some efforts to promote diversity and inclusion in the workforce:

Does my credit union:	Yes	No
1. Implement policies and practices that create or foster diverse applicant pools for employment opportunities? These may include:		
a. Outreach to minority, women, or other diverse organizations? <sup>1</sup>		
b. Outreach to educational institutions serving significant minority, women, or other diverse student populations?		
c. Participation in conferences, workshops, or other events that attract minorities, women, or other diverse individuals to inform them of employment and promotion opportunities?		
2. Communicate employment opportunities in diverse media, including publications or professional organizations and educational institutions serving minority, women or other diverse populations?		
3. Cultivate relationships with professional organizations or educational institutions that primarily serve minority, women, or other diverse groups?		
4. Hold management responsible for diversity and inclusion efforts, such as ensuring these efforts align with business strategies or individual performance plans?		
5. Use analytical tools to evaluate various business objectives, including metrics to track and measure the inclusiveness of our workforce (e.g., race, ethnicity, gender, and other diverse categories)? <sup>1,2,3</sup>		

<sup>1</sup> Other diverse groups or organizations refer to those identified in your diversity and inclusion policies, such as disabled persons, veterans, lesbian/gay/bisexual/transgender individuals.

<sup>2</sup> An example of an analytical tool is the Employer Information Report EEO-1 (EEO-1 Report) that tracks and analyzes employment statistics by gender, race, ethnicity, and occupational groups. An EEO-1 Report is required to be filed annually with the Equal Employment Opportunity Commission by (a) private employers with 100 or more employees and (b) federal contractors and first tier subcontractors with 50 or more employees that have a contract or subcontract of \$50,000 or more; or that serve as a depository of government funds in any amount.

<sup>3</sup> Other examples of analytical tools can be found in [NCUA's 2014 Office of Minority and Women Inclusion \(OMWI\) Congressional Report](#).



Does my credit union:	Yes	No
6. Evaluate our diversity and inclusion programs regularly, and identify areas for future improvement?		
7. Use quantitative or qualitative measurements, or both, to assess our workforce diversity. For example, does my credit union reflect such efforts in applicant tracking, hiring, promotions, career development, or retention across all levels and occupations of the credit union, including the executive and supervisory ranks?		
8. Implement policies and practices related to workforce diversity and inclusion to ensure equal employment opportunities for employees and applicants for employment?		

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### 3. Does My Credit Union Consider Supplier Diversity As Part of Its Contracting and Business Practices?

Credit unions can craft and implement supplier diversity policies and practices to expand outreach for contracting opportunities to minority- and women-owned businesses.<sup>4</sup> This may consist of providing an opportunity for these businesses to bid on certain products or services (e.g., office supplies, promotional items and legal or accounting services) and communicating your training and contracting opportunities to inform these businesses on how to do business with your credit union. The goal is to develop a competitive advantage by having a broad selection of available suppliers to choose from with respect to factors such as price, quality, attention to detail, and future relationship building. The following questions identify some efforts to implement or demonstrate supplier diversity:

Does my credit union:	Yes	No
1. Have a written supplier diversity policy that provides for opportunities for minority- and women-owned businesses to compete to deliver business goods and services? <sup>5</sup>		
2. Have leadership support to incorporate supplier diversity into the business planning cycles or initiatives?		
3. Have a policy to encourage a percentage (e.g., 33 percent) of businesses invited to bid on our contracts encompass qualified minority- and women-owned businesses?		
4. Use outreach to inform minority- and women-owned businesses (or affinity groups representing these constituencies) of contract opportunities and how to do business with us?		
5. Use metrics to identify the baseline of and track:		
a. the amount we spend procuring and contracting for goods and services?		
b. the availability of relevant minority- and women-owned businesses?		
c. the amount we spend with minority- and women-owned businesses?		
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?		
e. the changes related to the above items over time?		

<sup>4</sup> See the NCUA Business Activity Diversity section of [NCUA's 2014 OMWI Congressional Report](#) and prior reports for detailed examples on how to implement supplier diversity policy and practices that aid in expanding contracting opportunities to minority- and women-owned businesses.

<sup>5</sup> For additional examples on creating a supplier diversity policy and program, conduct an internet search on “Best Practices in Minority Supplier Development” or “Supplier Diversity Practices.”



Does my credit union:	Yes	No
6. Implement practices that promote a diverse supplier pool, which may include:		
a. Outreach to minority- and women-owned businesses or representative organizations?		
b. Participation in conferences, workshops, or other events that attract minority- and women-owned businesses to inform them of our contracting opportunities?		
c. Maintain a listing of qualified minority- and women-owned businesses that may bid on upcoming contracting opportunities?		
d. Have an ongoing process to publicize our contracting opportunities?		
7. Encourage prime contractors to use minority- and women-owned subcontractors by incorporating this objective in their business contracts?		

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#### 4. Does My Credit Union Promote Transparency of its Diversity and Inclusion Practices?

Transparency and communication are important aspects of assessing diversity policies and practices. Transparency does not require you to share credit union confidential and proprietary information. Credit unions can communicate information about their diversity and inclusion efforts through normal business methods, which include displaying information on their websites, in any appropriate promotional materials, and in annual reports to members.

By communicating your commitment to diversity and inclusion, your plans for achieving diversity and inclusion, and the metrics to measure success in workplace and supplier diversity, you inform a broad constituency of current and potential members, employees, potential employees, suppliers, and the general community about your affirmative efforts to promote diversity and inclusion. The publication of this information can make new markets accessible for minorities, women, and other diverse groups, and illustrate the progress made toward an important business goal. Here are some examples of efforts to promote transparency of your credit union’s diversity and inclusion efforts:

Does my credit union:	Yes	No
1. Summarize, for possible publication, our efforts to enhance diversity and inclusion, which may include:		
a. Detailed information of diversity and inclusion efforts?		
b. Demographic information on workforce composition?		
c. Demographic information on supplier diversity?		
d. Demographic information on the board members and other officials?		
e. Information on sponsorships or partnerships with diverse organizations?		
2. Make the following information available to our members and the public:		
a. Our diversity and inclusion strategic plan?		
b. Our policy on the credit union’s commitment to diversity and inclusion in the workforce?		
c. Our policy on the credit union’s commitment to supplier diversity (contracting activities)?		
d. Our efforts and progress toward achieving diversity and inclusion in our workforce and contracting activities?		



Does my credit union:	Yes	No
e. Offer opportunities that promote diversity and inclusion, which may include:		
■ Current employment and contracting opportunities?		
■ Forecasts of potential employment and contracting opportunities?		
■ Availability and use of mentorship and developmental programs for employees and contractors?		

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## 5. Does My Credit Union Assess its Diversity Policies and Practices and Monitor Progress Over Time?

Credit unions with successful diversity policies and practices allocate time and resources to monitor and evaluate performance under their diversity policies and practices on an ongoing basis. NCUA encourages credit unions to disclose their diversity policies and practices, as well as related information, to NCUA and the public.

Does My Credit Union:	Yes	No
Modify our policies and practices based on the results of the evaluation or self- assessment of our diversity policies and practices?		

## 6. Comments

Provide comments on any areas your credit union would like to explain in greater detail.

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You may voluntarily submit this checklist and other related information to NCUA’s Office of Minority and Women Inclusion as your diversity policy and practices self-assessment. This information may be sent by mail or e-mail to:

National Credit Union Administration  
Office of Minority and Women Inclusion  
1775 Duke Street  
Alexandria, VA22314  
(703) 518-1650  
[OMWImail@ncua.gov](mailto:OMWImail@ncua.gov)

Credit unions submitting their information to NCUA that is confidential commercial information can designate it as such. If a member of the public requests the confidential information from NCUA under the Freedom of Information Act (FOIA),<sup>6</sup> agency FOIA personnel will notify the credit union of the request. The FOIA personnel will then give the credit union the opportunity to substantiate its position that material should be withheld or to agree that information is not confidential before moving forward with any release. In addition, NCUA may only highlight or showcase your credit union’s diversity policy or practice with your permission.

Contact information of person who completed self-assessment:

Name \_\_\_\_\_ Position/Title \_\_\_\_\_  
Credit Union Name \_\_\_\_\_ Credit Union # \_\_\_\_\_  
Telephone Number \_\_\_\_\_ Email: \_\_\_\_\_  
Submission Date \_\_\_\_\_

<sup>6</sup> 5 U.S.C. § 552.