



DIVERSITY EQUITY AND INCLUSION

2021–23
Strategic Plan

CULTURE

CAREER

COMMUNICATION

CONSISTENCY

COMMUNITY

FDIC 

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A MESSAGE FROM THE CHAIRMAN



Twenty-seven years ago, a colleague at a car dealership said to me, “You know, you won’t succeed in America if you don’t lose your accent.” Many jobs later, I became Chairman of the Federal Deposit Insurance Corporation (FDIC), and as of this writing, I still speak with an accent. That was an early lesson in what it feels like to not belong at a workplace, despite my best effort.

It should not come as a surprise that at subsequent jobs, especially once I had an opportunity to lead and shape the workforce culture, I focused on bridging the gap between colleagues who feel like they belong and those who do not. When I was initially briefed on diversity and inclusion efforts at the FDIC, I was presented with data, statistics, tables, and progress reports. I reviewed the briefing materials and said, “All this is helpful, but how do people feel?” So I started talking with our employees and learned that we have much work to do.

As FDIC Chairman, my goal is to build and maintain a workforce that is talented, diverse, and committed to fostering a safe, fair, and inclusive workplace and banking system. We have made progress in these areas over the past two-and-a-half years, but I know we can do more. My vision is built on a recognition of our current progress and a clear grasp of what could be.

To execute on this vision, we took a comprehensive look at how to (i) ensure that our decision-making reflects

and respects the diversity in the nation, (ii) support diversity in the financial institutions we supervise, and (iii) build a culture that enhances, values, and capitalizes on the diversity in our workforce.

We reached one conclusion: we must and can do more.

This *Strategic Plan* is a key step in that process. It is organized around five strategic goals — culture, career, communication, consistency, and community. Our high-level goals are augmented by actionable steps that provide a clear map forward for the agency. Internally, the plan further integrates diversity, equity, and inclusion (DEI) into our hiring, training, and career development programs. It calls on leaders at all levels of the organization to develop operational plans reflective of their current DEI performance and business realities and will hold them accountable for advancing their plans and achieving results. Externally, the plan will improve DEI in FDIC contracting opportunities, enhance our ability to assess diversity policies and practices at financial institutions, and provide additional support for Minority Depository Institutions.

To be successful, our DEI efforts must be led and managed as an organizational priority. This plan – in combination with our first-ever corporate performance goal dedicated to improving DEI – does just that. This plan will guide our work over the next few years, help us measure our progress, and hold us accountable.

I hope many of you will recognize that this plan is unlike others we have had in the past. I hope you will also recognize its potential and the will – at all levels of the organization – to make lasting changes. I stand behind it with my commitment to you that, until the day my chairmanship ends, I will work toward an inclusive FDIC where all feel that they belong.

To create a culture of belonging will require all-hands-on-deck. Please join me.

Jelena McWilliams

A MESSAGE FROM THE DIRECTOR OF THE OFFICE OF MINORITY AND WOMEN INCLUSION



a choice: the pain of change or the pain of staying the same.

This plan is our call to action. It sets forth how the FDIC will work to transform our workforce and how our efforts will ultimately help make the banking system safer, fairer, and more inclusive. As Chairman McWilliams noted in her message, this plan is unlike any other we have had before. It tackles the very core of who we are as an agency. It takes a deep dive into root causes of our culture, ethics, and history, as a society and as a venerable agency. It is brutally honest in the assessment of our successes and past failures on issues that matter on an intrinsic level to us, as a people, and as colleagues.

Eight minutes, 46 seconds. I have never been able to watch the entire video of George Floyd being killed in police custody. It is too painful. Every time I hear Breonna Taylor’s name I think of the many nights I have watched my daughters sleep peacefully in their beds, trusting that they are safe. I reflect on the many days I jogged in my home state of Georgia and was blessed to return home safely, unlike Ahmaud Arbery.

And when you take a holistic, introspective look and are willing—and ready—to make real change, you end up with the plan before you. The steps outlined embrace the growing pains of addressing longstanding challenges by embedding DEI into every aspect of our operations. We will support our workforce and our communities to reach their full potential. We will promote inclusive prosperity by including minority- and women-owned businesses, law firms, and investors in our business activities. We will partner with our supervised institutions to identify and promote DEI policies and practices to make their communities more inclusive.

These horrendous events may feel personal to me as a Black woman, but I am painfully aware that many individuals and communities feel disenfranchised, regardless of their skin color. What I never anticipated is that I would be writing about such important matters to introduce a *Strategic Plan* at the FDIC. While those events have forced a long-overdue national conversation about race in America, our view of diversity, equity, and inclusion (DEI) must be broad and it must be bold. That realization formed the very foundation of this *Strategic Plan*.

During my 22-year tenure with the FDIC, I have never been more proud to work for this agency than I am today. This plan will drive meaningful progress. We will hold ourselves accountable for the execution and the results. Most importantly, we will no longer accept the status quo.

We examined our data and listened to our colleagues to gain a better understanding of what needs to be done. We had honest conversations about the significant commitment needed to be successful. We listened. And then we listened some more. The more we listened, the clearer it became that the FDIC faces

Join us on the journey.

Nikita Pearson

DIVERSITY, EQUITY, AND INCLUSION VISION, MISSION, AND VALUES

DEI Vision

Our workforce is talented, diverse, and committed to fostering a safe, fair, and inclusive workplace and banking system.

DEI Mission

To foster a culture that exemplifies teamwork, embraces innovation, and values diversity, equity, and inclusion to achieve mission excellence.

DEI Values

The following values hold true to our vision, shape how we carry out our mission, and guide how we are expected to treat one another.

- *We take* the broadest possible view of diversity, including seen and unseen qualities.
- *We acknowledge* life experiences that make individuals unique.
- *We encourage* all employees to use their unique perspectives to help advance our mission.
- *We require* fair treatment, accessibility, and opportunity for advancement for all employees.
- *We expect* our workplace to be an inclusive environment built on mutual trust, respect, and dignity.
- *We incorporate* diversity, equity, and inclusion in our daily work.
- *We commit* to building a workplace where all employees feel safe bringing their authentic selves to work.
- *We pledge* to identify and eliminate barriers to equal opportunity in the workplace.
- *We will foster* diversity, equity, and inclusion in the banking system consistent with our mandate.

SUMMARY OF DIVERSITY, EQUITY, AND INCLUSION GOALS

Goal 1. Culture

Ensure that leaders at all levels promote the vision and business case for DEI by taking actions to increase diversity and equity in the workforce and maintain an inclusive workplace.

Goal 2. Career

Recruit, hire, and develop a high-performing workforce that reflects the communities we serve by optimizing experiences throughout an employee's career.

Goal 3. Communication

Develop compelling messages, including opportunities for dialogue, that encourage all employees to see the importance of DEI to their personal success and the success of the FDIC.

Goal 4. Consistency

Mature the DEI model to improve the consistency of desired outcomes by strengthening policies and procedures, utilizing technology, and enhancing training.

Goal 5. Community

Encourage DEI in FDIC business activities and at regulated financial institutions, and foster financial inclusion in the banking system.

1. Culture

Ensure that leaders at all levels promote the vision and business case for DEI by taking actions to increase diversity and equity in the workforce and maintain an inclusive workplace.

1.1 Culture of Excellence. Ensure every employee has the opportunity to develop and excel in their career and recognize and reward high performers.

- a. Fully implement a new performance standard for supervisors and managers that focuses on employee career development and the cultivation of an inclusive, constructive work environment that is committed to Equal Employment Opportunity (EEO) policies and principles and is built upon transparent communication, mutual trust, and respect.
- b. Conduct analysis to identify root causes of any barriers to equal employment opportunities, establish timelines to regularly review programs for systemic barriers, and take action to remedy the policies, procedures, or practices that created the barriers.
- c. Develop and implement a plan to provide all managers access to services to receive employee feedback and coaching for inclusion at work.
- d. After all appeals have been exhausted, include a notation in the personnel record of an employee who was subject to an adverse action, under 5 U.S.C. §7512, as a result of an act of discrimination and/or retaliation.

1.2 Data Excellence. Build a results-oriented DEI strategy based on actionable data.

- a. Modernize the Diversity and Inclusion Analytics Dashboard to provide actionable management data in an easy-to-read format.
- b. Identify key performance indicators that measure success and identify opportunities, and report at least quarterly to the Diversity and Inclusion Executive Advisory Council.
- c. Track and analyze applications and selections for Expressions of Interest (EOIs) and other career development programs to evaluate and improve inclusion.

1.3 Best Practices. Select and implement DEI best practices that would be most effective at the FDIC.

- a. Complete the review of applications submitted under the Pay Adjustment Program to assess potential pay inequities and implement approved pay changes.
- b. Develop diverse interview panel guidance and require hiring managers to certify that it was followed for all selections.
- c. Require hiring managers to include at least one interview question to assess management candidates on their ability to foster DEI.
- d. Benchmark other agencies and the private sector for best practices in preventing and addressing discrimination and retaliation.

2. Career

Recruit, hire, and develop a high-performing workforce that reflects the communities we serve by optimizing experiences throughout an employee’s career.

2.1 Talent Acquisition. Ensure talent acquisition practices consistently provide equal opportunity and strive to close representation gaps at all levels.

- a. Ensure Division/Office Directors develop and implement a plan in 2021, in partnership with the Office of Minority and Women Inclusion (OMWI), to promote increased diversity and improve their 2020 Federal Employee Viewpoint Survey (FEVS) inclusion quotient no later than 2023.
- b. Ensure hiring managers certify their review of Schedule A rosters for potential selections.
- c. Assign an OMWI representative to serve as an equal employment opportunity advisor to the Executive Review Panels for Financial Management Scholars (FMS) Program and Entry-Level Examiner Hiring.
- d. Reduce the average number of days for examiner travel from the average reported in 2019, using technology, to improve retention.
- e. Implement a First Generation Professionals Initiative as a Special Emphasis Program to include events, workshops, and programming that serve as resources to promote equitable access and opportunities.
- f. Identify opportunities to strengthen engagement with diverse groups, such as partnering with the White House Initiative on Historically Black Colleges and Universities (HBCUs), Hispanic Association of Colleges and Universities (HACUs), Council on Legal Education Opportunity (CLEO), Leadership Education and Development (LEAD) for Life, community-based organizations, and civil rights organizations to improve the effectiveness of our recruitment strategies.

2.2 Career Development. Maintain a diverse leadership pipeline including a framework for holding managers accountable for actively promoting career development and advancement opportunities for their employees.

- a. Develop and implement a new leadership development framework that includes a corporate-wide succession management program focused on the development of a broad, diverse, and talented cadre of future FDIC leaders.
- b. Improve access to developmental opportunities by reforming the Expression of Interest (EOI) Program to eliminate the need for supervisor approval.
- c. Implement a new, rotational Special Assistant Program to provide developmental opportunities for aspiring leaders.

2.3 Employee Engagement. Increase opportunities for employees to be engaged in achieving DEI goals.

- a. Update the Chairman’s Diversity Advisory Council (CDAC) and Employee Resource Group (ERG) directives to reflect organizational priorities and support the groups’ contributions to the FDIC’s DEI mission.
- b. Host a training conference for CDACs and ERGs on how to get the most out of programming that results in changed behavior and/or measurable outcomes.
- c. Pilot a Diversity Ambassador Program where representatives from CDACs and ERGs will provide support to new employees regarding DEI at the FDIC.
- d. Pilot an event designed to educate immediate family members of FDIC employees on benefits and services available to support work-life balance and career management to help the family feel more connected and engaged with the FDIC and ultimately improve retention.

3. Communication

Develop compelling messages, including opportunities for dialogue, that encourage all employees to see the importance of DEI to their personal success and the success of the FDIC.

3.1 Trust through Transparency. Provide clear, consistent, and regular messaging of the DEI vision and actions being taken to achieve desired outcomes.

- a. Host annual OMWI Town Halls with all FDIC employees to review the *DEI Strategic Plan*, acknowledge past accomplishments, identify key challenges, and highlight areas of focus for the coming year.
- b. Ensure Division/Office Directors discuss their divisional DEI plans at least annually at an all-hands meeting.
- c. Ensure Regional Directors discuss their regional plans to support DEI at least annually at an all-hands meeting.
- d. Conduct semiannual meetings between OMWI and Division/Office leadership to discuss DEI best practices and identified gaps in their DEI performance.
- e. Share key points of DEI public filings (e.g., MD-715) with all employees via global messaging.
- f. After all appeals have been exhausted, provide notice on the public website (www.fdic.gov) of any final finding of discrimination and/or retaliation made against the agency as required by the Elijah E. Cummings Federal Employee Antidiscrimination Act of 2019.
- g. Post data regarding each class-action complaint filed against the agency alleging discrimination and/or retaliation.

3.2 Branding. Partner with the Office of Communications (OCOM) to use meaningful context to turn DEI data into compelling narratives that make messaging more impactful and demonstrate the necessity for continued efforts in DEI.

- a. Update internal and external webpages with compelling messages that illustrate our commitment to DEI in our workforce, our business activities, and our supervised banks.
- b. Create an annual impact report that accurately measures and communicates the effectiveness of our DEI efforts and any actions that must be taken to achieve better outcomes.
- c. Develop and implement a social media and marketing campaign to engage a broad and diverse talent pool and communicate key initiatives and programs.

3.3 Reinforcement. Integrate DEI into communications.

- a. Coordinate with stakeholders to include DEI when crafting and issuing internal and external agency communications and building or acquiring information technology solutions (e.g., Section 508 compliance, inclusive visuals and language, reasonable accommodation language, etc.).

4. Consistency

Mature the DEI model to improve the consistency of desired outcomes by strengthening policies and procedures, utilizing technology, and enhancing training.

4.1 Inclusive Environment. Foster a work environment without barriers to opportunity, where all employees feel welcomed, valued, respected, and engaged, and can effectively participate and bring their unique talents, skills, and perspectives.

- a. Develop and implement a program to conduct regular internal audits of regional, field, and headquarters offices to identify EEO program deficiencies and evaluate barrier analysis efforts as recommended by the Equal Employment Opportunity Commission (EEOC).
- b. Update telework, work-in-place, and remote work policies to better support inclusion by increasing, as appropriate, flexibilities available to meet employee needs.
- c. Expand the Anti-Harassment Program directive to include guidance for reporting issues to appropriate FDIC offices and other authorities if an employee experiences issues while interacting with external stakeholders on official duty.
- d. Enhance current assessment tools (e.g., exit surveys) to measure attrition, identify reasons for attrition, and address barriers to equal employment opportunities.
- e. Update the Anti-Harassment Program directive to require investigation of harassment complaints to commence within 10 days, and corrective action be taken within 60 days, of receipt of the complaint.

4.2 Technology Enhancements. Apply technology solutions to improve the efficiency and effectiveness of DEI efforts.

- a. Implement online assessments to mitigate the potential for discrimination or bias in entry-level examiner hiring.

- b. Implement a voluntary internal survey mechanism for gender identity, sexual orientation, and other key identifiers to provide a full picture of diversity in our workforce.
- c. Develop and implement a comprehensive reasonable accommodation information system to improve the efficiency and effectiveness of processing requests and compiling data.

4.3 Training Plan. Promote workshops and learning sessions designed to increase cultural competencies and skills in promoting equal opportunity.

- a. Conduct empathy-based training for all managers and employees.
- b. Train selecting officials, interviewers, and Subject Matter Experts (SMEs) on ensuring consistency in the hiring process, including requirements of the Americans with Disabilities Act of 1990, the Rehabilitation Act of 1973, and Title VII of the Civil Rights Act of 1964.
- c. Provide toolkits and other educational and learning opportunities for hiring officials regarding use of special hiring authorities for persons with disabilities.
- d. Conduct mock interviews for both hiring officials and employees with disabilities to increase comfort with, and the effectiveness of, the hiring process.

5. Community

Encourage DEI in FDIC business activities and at regulated financial institutions, and foster financial inclusion in the banking system.

5.1 Economic Opportunity. Identify barriers that underserved communities and individuals may face in taking advantage of FDIC procurement and contracting opportunities and ensure the inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women, including financial institutions, investors, underwriters, accountants, and providers of legal services, in contracts entered into by the FDIC.

- a. Implement a series of technical assistance events to educate and equip minority- and women-owned businesses (MWOBs) with the tools they need to compete for contracts.
- b. Host “Pitch Days” where MWOBs may share their companies’ capabilities and learn about the FDIC’s procurement process.
- c. Review the selection process for historically marginalized attorneys and minority- and women-owned law firms (MWOLFs) to determine if there are opportunities to enhance the selection process, within existing guidelines, for legal referral services.
- d. Partner with the Division of Resolutions and Receiverships (DRR) to host a joint ventures virtual conference and provide technical assistance to minority- and women-owned investors (MWOIs).
- e. Determine whether new policies, regulations, or guidance documents may be necessary to advance equity in agency actions and programs and procurement and contracting opportunities.

5.2 Technology Solutions. Implement automated tools to improve the efficiency and effectiveness of the FDIC’s ability to assess diversity policies and practices at regulated entities and within the contractor workforce.

- a. Streamline and enhance the Financial Institution Diversity Self-Assessment (FID-SA) Application to increase and improve submissions by regulated entities.
- b. Develop and implement a portal in support of OMWI vendor outreach activities.
- c. Implement and enhance the automated tool for performing good faith effort reviews of the contractor workforce.

5.3 DEI Advisor. Provide advice on matters with the goal of supporting financial inclusion in the development and implementation of FDIC policies, including those which promote diversity and inclusion of historically underserved and marginalized populations.

- a.** Explore creation of a non-profit to provide technical assistance to minority depository institutions (MDIs) on digital transformation.
- b.** Explore mechanisms to support internships at MDIs, Community Development Financial Institutions (CDFIs), and other interested financial institutions for students from HBCUs and other Minority-Serving Institutions (MSIs) with established technology programs.
- c.** Train examiners on examining unique business models of MDIs.
- d.** Provide DEI perspective for public awareness campaigns to ensure goals are met and prevent unintended consequences.
- e.** Create a network roadmap illustrating and connecting activities that the FDIC conducts to enhance outreach potential of all programs and initiatives that support DEI.

APPENDIX – KEY CONCEPTS AND TERMS

Authentic Self	Who an individual is as a person, demonstrating different experiences, perspectives, cultures, history, etc., without being forced to conform to the majority culture in the workplace. The work culture must value a wide range of talents, skills, and experiences to create a sense of belonging for everyone without causing harm to others.
Cultural Competency	The ability to understand, accept, and interact with individuals of different backgrounds and cultures.
Disability	A physical or mental impairment that substantially limits one or more major life activities.
Disabled Veteran	A person who has served on active duty in the armed forces, has separated under honorable conditions, and has established the present existence of a service-connected disability or is receiving compensation, disability retirement benefits, or pension because of a public statute administered by the Department of Veterans Affairs or a military department.
Diversity	Diversity encompasses the range of similarities and differences each individual brings to the workplace, including but not limited to, national origin, language, race, color, disability, ethnicity, gender, age, religion and belief, sexual orientation, gender identity, socioeconomic status, veteran status, family structure, and diversity of thought, all of which is shaped by culture, background, experiences, and other elements.
Equity	Consistent, systematic, fair, just, and impartial treatment, access, opportunity, and advancement for all individuals, including individuals who historically have been denied such treatment, while striving to identify and eliminate barriers that might prevent any employee’s full and equitable participation in the workplace.
Inclusion	Inclusion is a set of behaviors (e.g., welcoming new employees, paying attention and extending an invitation, seeking and respecting other perspectives, etc.) that promote equal access to opportunities and resources for individuals who might otherwise be excluded or marginalized.

Individual/Person with a Disability	A person with a physical or mental impairment that substantially limits one or more major life activities (such as walking, talking, seeing, hearing, or learning), has a record of such impairment, or is regarded as having an impairment unless the impairment is both transitory and minor.
Reasonable Accommodation	Any change in the work environment (or in the way things are usually done) to help a person with a disability apply for a job, perform the essential duties of a job, or enjoy the benefits and privileges of employment.
Self-Identification of Disability	The voluntary completion and submission of information from the Office of Personnel Management’s (OPM’s) Standard Form 256 (SF 256) identifying that a person has a disability, either by hard copy of the SF 256 to the servicing Human Resources Branch personnel in the Division of Administration, or electronically through the MyEPP system using the appropriate code from the SF 256.
Talent Acquisition	Long-term human resources planning and finding appropriate candidates for positions that require specific skillsets to fulfill a business need.
Targeted Disability	Specific, severe disabilities targeted for emphasis in affirmative action planning that include, but are not limited to, developmental disabilities, traumatic brain injury, deafness, blindness, missing extremities, partial paralysis, complete paralysis, epilepsy, intellectual disabilities, psychiatric disabilities, dwarfism, and significant disfigurement.
Underserved Communities	Populations sharing a particular characteristic, as well as a geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civil life.
Unseen Diversity Characteristic	Non-visible personal characteristics such as background, culture, and personality, as well as protected classes such as disability, sexual orientation, and religion and belief.