



FEDERAL DEPOSIT INSURANCE CORPORATION

DIRECTIVE SYSTEM

TYPE AND NUMBER Circular 2710.14	
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TO: All Divisions and Offices

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SUBJECT: Corporate Outreach Program

1. Purpose To provide policies and procedures for FDIC's participation in Corporate Outreach Events, define the Corporate Outreach criteria, and establish the Corporate Outreach Committee.

2. Revisions FDIC Circular 2710.14, Corporate Outreach Program, dated March 2, 2009, is hereby revised and superseded.

3. Scope The provisions of this Circular apply to all Divisions and Offices involved in Corporate Outreach Events, except the Office of Inspector General. The policies and procedures outlined in this Circular affect all initiatives and events in which the FDIC participates and that are within the definition that appears in Section 7 - Outreach Definition.

4. Background The FDIC has a long history of participating in outreach events nationwide. This outreach effort serves the following purposes:

- a. Maintains and enhances the corporate image as a federal financial regulatory agency;
- b. Assists in increasing public confidence in the stability of the deposit insurance fund and the U.S. banking system;
- c. Promotes diversity and inclusion in employment, business and contracting activities, asset purchasing opportunities, and
- d. Fulfills all applicable statutory requirements for outreach.

The FDIC disseminates a variety of information through the Corporate Outreach Program and meets with trade organizations, industry groups, professional associations, the public, applicants for employment, international organizations, and others to discuss a wide range of topics. These topics include, but are not limited to:

- a. Diversity best practices;
- b. Employment opportunities;
- c. Contracting and business opportunities including legal services;
- d. Risks that might impact the banking industry;
- e. Deposit insurance coverage;
- f. Financial literacy;
- g. Financial industry conditions;
- h. Investor interest in receivership assets;
- i. Public policy issues;
- j. Community and economic development; and
- k. The Community Reinvestment Act of 1977, which includes fair lending laws.

5. Authority

- a. **The Financial Institution Reform, Recovery and Enforcement Act of 1989 (FIRREA)**, provides that FDIC shall: "...prescribe regulations to establish and oversee a minority outreach program to ensure inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women, including financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts entered into by the agency" 12 U.S.C §1833(e)(c). FDIC implemented these statutory requirements in the regulation "Minority and Women Outreach Program," 12 C.F.R. Part 361.
- b. **Section 342(a)(1)(A) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (DFA)**, requires each federal financial regulatory agency to establish an Office of Minority and Women Inclusion (OMWI). On January 21, 2011, the FDIC Board of Directors took action to establish OMWI and transferred the responsibilities and employees of the former Office of Diversity and Economic Opportunity (ODEO) to the

new OMWI. In compliance with this Act, OMWI is responsible for agency matters relating to diversity in management, employment, and business activities.

OMWI is also responsible for ensuring, to the maximum extent possible, the fair inclusion and utilization of minorities, women, and minority- and women-owned businesses in the contracting process, including but not limited to:

- (1) Providing technical assistance;
- (2) Ensuring fair inclusion of women and minorities within the contractor workforce;
- (3) Recruiting at minority institutions; and
- (4) Advertising with various minority and women trade publications.

c. **DFA Section 342(f)** requires, among other things, the FDIC to take affirmative steps to seek diversity in its workforce. Specifically, DFA Section 342(f)(5) refers to partnering with inner-city high schools, girls' high schools, and high schools with majority minority populations to establish or enhance financial literacy programs and provide mentoring.

FDIC is also a member of the Financial Literacy and Education Commission (FLEC), which was established under the Fair and Accurate Credit Transactions (FACT) Act of 2003.

d. **12 U.S.C. 2901(b) and 12 U.S.C. 2902(1)(c) (Community Reinvestment Act)** requires the FDIC to use its authority to encourage regulated financial institutions to use safe and sound operations as they work to meet the credit needs of the local communities.

6. Policy and Ethics

a. **Policy.** It is the policy of the FDIC to participate in outreach events that:

- (1) Are consistent with the FDIC mission and Strategic Plan;
- (2) Maintain and enhance FDIC's image as a financial regulatory agency;
- (3) Increase public confidence in the stability of the deposit insurance fund and in the U.S. financial services industry;
- (4) Provide corporate information and services to the financial services industry;

(5) Promote diversity and inclusion in employment and business and contracting activities; and

(6) Fulfill statutory requirements for outreach.

b. **Ethics.** Nothing in this Circular is intended to supersede the policies and procedures set forth in the Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. §2635; the Supplemental Standards of Ethical Conduct for Employees of the Federal Deposit Insurance Corporation, 5 C.F.R. §3201; FDIC Circular 2410.7, Acceptance of Free Attendance at Widely Attended Gatherings and Other Events; or FDIC Circular 2410.8, Guidelines for Co-Sponsoring Events with the Public and Private Organizations.

7. Outreach Definition

a. A Corporate Outreach Event, as outlined in this Circular, consists of national, regional, or state events where FDIC provides information on consumer updates, employment opportunities, diversity and inclusion initiatives to include opportunities for minority firms to independently purchase or partner with larger investors to purchase assets retained by FDIC as Receiver of failed institutions, and contracting opportunities for Minority- and Women-Owned Businesses (MWOB) and Minority- and Women-Owned Law Firms (MWOLF). Information is also provided on banking laws and regulations, financial products, procurement policies, and industry trends.

b. Outreach includes the identification and registration of MWOBs and MWOLFs that can provide goods and services utilized by FDIC, through activities including, but not limited to:

- (1) Exhibits;
- (2) Panel participation;
- (3) Presentations;
- (4) Conference attendance; and
- (5) Advertisements.

c. FDIC staff participates on panels, conducts seminars and workshops, educates businesses and applicants for employment about FDIC, and speaks before banking or public conferences that are national or regional in scope. In addition, outreach includes monitoring to ensure that FDIC staff interfacing with the contracting community is knowledgeable of and actively promoting the goal of diversity and inclusion. Examples of outreach events include, but are not limited to:

National Conferences such as:

- (1) American Bankers Association;
- (2) National Bankers Association;
- (3) U.S. Hispanic Chamber of Commerce;
- (4) National Center for American Indian Enterprise (Reservation Economic Summit);
- (5) National Council of LaRaza;
- (6) National Urban League;
- (7) Organization of Chinese Americans,
- (8) National Minority Suppliers Development Council;
- (9) National Bar Association;
- (10) National Hispanic Bar Association;
- (11) National Asian Pacific American Bar Association; and the
- (12) National Association of Minority and Women Owned Law Firms.

Only those events supporting the criteria described above should be referred to OMWI for inclusion in the Corporate Outreach schedule.

d. Excluded from Corporate Outreach Events are:

- (1) FDIC program responsibilities specifically related to deposit insurance or economic inclusion; and
- (2) Routine operational activities or business meetings with banks or industry associations.

8. Responsibilities

a. **Divisions and Offices** will:

- (1) Perform annual outreach planning at the Division and Office level;
- (2) Provide annual outreach planning, budgeting, and approved scheduling information for the coming year to OMWI by September 30th of each year;

- (3) Communicate outreach information to other Divisions and Offices to ensure the effective coordination of outreach operations;
- (4) Implement internal policies and procedures, as needed, that do not conflict with this Circular;
- (5) Consult with the FDIC Ethics Office as necessary on any outreach event covered by the provisions of this Circular as outlined in Section 7;
- (6) Assess outreach events annually to determine future Division and Office participation; and
- (7) Facilitate the provision of speakers and panel members for participation in conference programs.

b. **OMWI** will:

- (1) Procure and coordinate the exhibit spaces and logistics for participation of Divisions and Offices, excluding the logistics for DOA Corporate Recruitment at Corporate Outreach Events, to ensure that the corporate image is maintained;
- (2) Maintain a tracking system of outreach activities covered by the provisions of this Circular that includes relevant information on each conference (e.g., date, participating offices, and budget information);
- (3) Facilitate annual Corporate outreach planning performed by Divisions and Offices;
- (4) Provide Divisions' and Offices' senior management with corporate-wide outreach information as needed;
- (5) Post and maintain information about the Corporate Outreach Program on OMWI's internal web site;
- (6) Coordinate preparation of a summary report on outreach activities for the year;
- (7) Coordinate with the Division of Depositor and Consumer Protection (DCP), Division of Insurance and Research (DIR), Office of the Ombudsman (OO), Division of Administration (DOA), Division of Resolutions and Receivership (DRR), Legal Division (Legal), and the Division of Risk Management Supervision (RMS) to ensure that appropriate and knowledgeable FDIC personnel are scheduled to staff exhibits at banking conferences; and

(8) Work with Divisions and Offices to review events attended on an annual basis to assess the FDIC's participation at future events.

9. Procedures

a. **Annual Operating Plan and Budget.** Each Division and Office participating in the Corporate Outreach Program will develop an annual operating plan for outreach events covered by this Circular. This planning will be mission-based, corporate-driven, goal-oriented, and include strategies to meet outreach objectives identified by the respective Division or Office. Outreach planning is also required to ensure sufficient staff and budget support will be available. Outreach planning and the identification of events for the coming year will coincide with the FDIC's budget process so that resources are allocated in the approved Division or Office. Proposed outreach budgets (e.g., conference registrations and travel) and appropriate approved conferences for the upcoming year should be forwarded to OMWI no later than September 30th of the current year.

b. **Coordination.** As the Corporate Outreach Coordinator, OMWI ensures optimal coordination among Divisions and Offices. OMWI will ensure that a consistent FDIC image and message is maintained by coordinating the logistics of events, which include the selection of exhibit booths, literature, and promotional items with input from the Division or Office lead participating office. Corporate Recruitment will be responsible for coordinating the logistics of recruitment events.

Divisions and Offices will provide outreach information to OMWI as needed to support its corporate-wide coordination function. Duplication of exhibits and excess staff representation at outreach events should be avoided. The information provided to OMWI will be used for coordination of outreach and management reporting. If any differences of opinion arise among Divisions or Offices regarding outreach activities, OMWI will collaborate with the Divisions and Offices to facilitate a resolution.

Each Division and Office that participates in outreach events as defined in this Circular shall designate an outreach point of contact (POC) who will perform, for his/her Division or Office, strategic planning and budgeting. A key function of the POC is to ensure that effective working relationships are maintained when Divisions and Offices are jointly undertaking outreach events

c. **Event Tracking.** OMWI will develop an annual calendar of Corporate Outreach Events and maintain a system to track budget expenses (Corporate Outreach Expense Report) related to the events. The calendar, which will be available at the

beginning of each calendar year, will contain relevant information on each event and will be used in conjunction with the Corporate Outreach Expense Report to provide management reports (e.g., outreach schedule and budget) as requested. The Corporate Outreach Expense Report will be shared with both FDIC senior management and Division and Office managers, as needed.

Division and Office outreach calendars for the coming year shall be completed and available to OMWI no later than September 30th of each September. Changes to conference events should be shared with OMWI immediately to update the Corporate Outreach Calendar.

d **Closeout Reporting.** OMWI will complete a Closeout Report for each event attended, which will be used for planning purposes by OMWI for assessing the return on objectives. The Closeout Report should be completed within fifteen (15) business days after an event. The closeout evaluations must include the following:

- (1) Name of the event;
- (2) Date and location of the event;
- (3) Nature of FDIC participation (e.g., speaker, panel, Division and Office and/or exhibit booth);
- (4) Estimate of the number of conference attendees and FDIC exhibit related questions;
- (5) Number of FDIC staff attending the event;
- (6) Travel Expenses;
- (7) Conference Expenses (including promotional items);
- (8) Goal and objective of FDIC participation;
- (9) Relative success at meeting the goal and objective of FDIC participation;
- (10) Recommendation for participating/not participating in future outreach functions hosted or sponsored by the organization; and,
- (11) Outstanding Commitments and Action Items.

The effectiveness of all outreach events covered by this Circular must be evaluated by the POCs of Divisions and Offices participating in the event.

e. **Literature.** Each Division and Office determines the literature to distribute at outreach events to reach the target audience. The literature can range from consumer publications, contracting informational folders, recruitment brochures, and other literature options that would be effective at the exhibit booth. The marketing literature should:

- (1) Ensure that a consistent corporate image is maintained;
- (2) Build public awareness and educate consumers; and
- (3) Promote FDIC career opportunities.

f. **Promotional Items.** It is appropriate and customary for the FDIC to distribute promotional items when participating in various outreach events. When selecting these items for purchasing, Divisions and Offices must be mindful of the cost and FDIC's fiduciary responsibility. Planning for the purchase of promotional items will be undertaken during FDIC's budget cycle. Additionally, promotional items should reflect a positive image of the FDIC. Promotional items should:

- (1) Ensure that a consistent corporate image is maintained;
- (2) Build public awareness and educate consumers; and
- (3) Promote FDIC career opportunities.

Note: OMWI will consolidate and purchase promotional items for all Corporate Outreach Events. In all instances, promotional items must be embossed with FDIC's logo and/or www.fdic.gov.

10. Corporate Outreach Committee

The Corporate Outreach Committee (Committee) is under the auspices of OMWI and includes committee members from DCP, DIR, OO, DOA, DRR, Legal, and the Office of Communications. The Committee's purpose and responsibilities are described below:

a. **Purpose.** The primary purpose of the Committee is to provide a forum for OMWI and participating Divisions and Offices to discuss relevant outreach information on policies, procedures, program activities, staffing, expenses, and scheduling of events.

b. **Committee Responsibilities.** The responsibilities of the Corporate Outreach Committee are to:

- (1) Assess each area of the program and offer suggestions for improvement;

- (2) Plan and execute a program of work that aligns itself with the FDIC's mission, vision and values as outlined in the Corporate Outreach Program Operating Procedures;
- (3) Enhance the public's perception of outreach professional standards and best practices;
- (4) Provide constructive observations regarding current or proposed outreach program policies and procedures; and
- (5) Meet at least twice a year.

11. Record Keeping Requirements

Records shall be maintained in accordance with FDIC Circular 1210.1, FDIC Records and Information Management (RIM) Policy Manual

12. Effective Date

The provisions outlined in this Circular are effective immediately.