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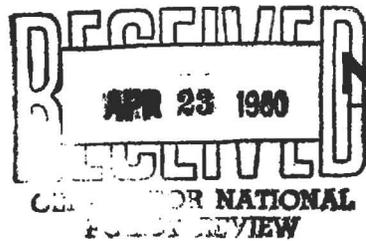
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April 14, 1980

Mr. Roger S. Kuhn, Co-Director
Center for National Policy Review
Catholic University of America
School of Law
Washington, DC 20064

Dear Roger:

After attending the April 8 semi-annual review meeting of the National Urban League v. Comptroller of the Currency settlement, I am again concerned with what I perceive as inherent difficulties in attempting to reach an acceptable enforcement of the suit. The Federal Home Loan Bank Board appears to be another example of a Federal agency which needs to scrutinize its own internal employment practices before condemning its members' policies.

Although we have long been aware of the situation, I am continually displeased with the FHLBB staff charged with implementing the terms of the settlement. Present at the meeting were a number of individuals responsible for the Bank Board's policies in this regard, however I saw no minority members and only one woman in a position of authority. I recall that this problem was discussed briefly at a review meeting almost one year ago, yet it has obviously not been satisfactorily resolved.

I was further troubled by the choice of the staff member from Topeka, Kansas as a representative of civil rights specialists in the field. This city does not have a substantial minority population, and the Kansas-Oklahoma-Nebraska region contains few, if any major metropolitan areas. Their record cannot reasonably be held up as a model of either Black and minority experience in

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the financial market, or of the Bank Board's successes or failures. An additional concern which bears analysis is the number of minorities in the field. To my knowledge there is only one black equal opportunity specialist.

Finally, I have recently received a letter from one of our Regional Directors who has been approached by two Black employees of an FDIC Regional Office, who claim that they and a number of co-workers have been discriminated against in terms of promotion and compensation. Although I was not able to assist them based on the terms of the suit, I found this again indicative of problems I perceive here in Washington.

I do not mean to imply by my comments that the Federal financial agencies should curtail their field and monitoring activities while attempting to get their own house in order. However, it seems obvious that the overall effort would be facilitated if their internal policies were a bit more acceptable. I would like to discuss this issue with you further; please call my office at your convenience.

Sincerely,



Maudine R. Cooper
Acting Vice President
for Washington Operations

cc: Jay Janis

MRS:SSM:db

4/23/80 - talked w. MC by phone; encouraged her to push this complaint, but pointed out not related to suit. She said she couldn't see progress; I said progress was being made under settlement, but EEO was separate issue.

RSK