



August 8, 2016

Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street, N.W.
Washington, DC 20549-1090

Re: Business and Financial Disclosure Required by Regulation S-K, File No. S7-06-16

Dear Mr. Fields:

The National Partnership for Women & Families is a non-profit, nonpartisan advocacy organization with more than 40 years of experience promoting fairness in the workplace, reproductive health and rights, access to quality, affordable health care, and policies that help women and men meet the dual demands of work and family. Since our creation as the Women's Legal Defense Fund in 1971, we have fought for every significant advance for equal opportunity in the workplace, and we continue to advocate for meaningful safeguards that prevent discrimination against women and families.

The National Partnership supports the Diversity Governance Indicators ("DGI") initiative, spearheaded by attorney Cyrus Mehri and described in a comment submitted by Working IDEAL on behalf of itself and Amalgamated Bank, Boston Common Asset Management, the National Women's Law Center and Sleigh Strategies LLC. This initiative promotes disclosure of common metrics for companies with 5,000 or more employees as to ensuring diversity in the board and in the workplace. DGI also calls on boards of directors to support diverse candidate pools in the search process and to appoint board level committees on human capital management that would include diversity issues.

We support the development of amendments to Regulation S-K that include new disclosure requirements on three Diversity Governance Indicators for publicly-traded companies in the United States employing 5,000 or more people:

- (1) **Board Diversity:** Disclosure of the specific recruitment and outreach actions taken to expand board diversity and the results, including whether or not candidate slates used to select individuals for open Board positions meet the standard set by the "Rooney Rule" (meaningful interviews with highly qualified candidates that would expand the board's existing gender, racial and ethnic diversity, and any other perspectives important to business growth not currently represented).
- (2) **Leadership and Workforce Diversity and Pay Equity:** Greater transparency on core diversity metrics and pay equity practices, including the gender, race and ethnicity of the highest paid employees on a percentage basis, companywide EEO-1

representation data, disclosure of pay equity audit programs and pay transparency policies, and corporate performance on diversity metrics over time.

(3) **Human Capital Leadership:** Whether any human capital subcommittee of the Board of Directors exists to oversee and drive sustainable change and strategically invest in the employees that constitute a company's most important asset – and if so, the members of that subcommittee.

We appreciate the opportunity to submit this letter in support of the DGI initiative. Thank you for your consideration.

Sincerely,

National Partnership for Women & Families