

MEMORANDUM

TO: Commission File No. S7-11-19

FROM: Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

RE: Meeting with Representatives from the Human Capital Management Coalition
and the Council of Institutional Investors

DATE: November 7, 2019

On November 7, 2019, Elizabeth Murphy, Lisa Kohl, Angie Kim, Courtney Lindsay and Sandra Hunter Berkheimer of the Division of Corporation Finance met with the following representatives from the Human Capital Management Coalition, as well as Jeffrey P. Mahoney from the Council of Institutional Investors:

- Cambria Allen-Ratzlaff
- Mary Hartman Morris
- Patricia Brammer

The participants discussed the comment letters submitted by the Human Capital Management Coalition, the California State Teachers' Retirement System (CalSTRS) and the Council of Institutional Investors regarding the Commission's Modernization of Regulation S-K Items 101, 103 and 105 proposed rule.