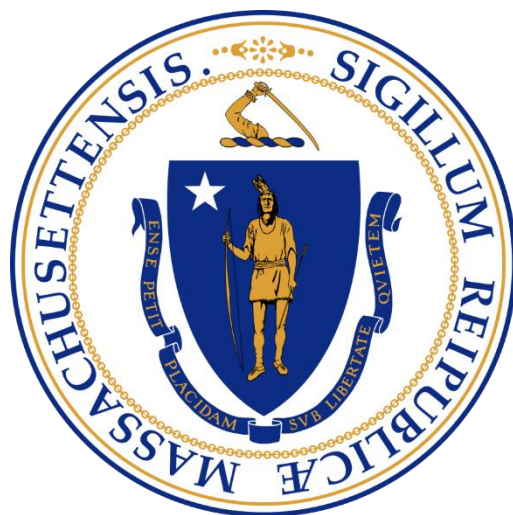




**A Review of Barriers
And
Recommendations:
Report of the Commission to
Plan, Develop, and Implement Strategies to
Support and Promote Minority-Owned Real Estate
and Financial Services Organizations
in the Commonwealth**

Date: March, 2020

ACKNOWLEDGEMENTS

The Commission wishes to express its appreciation to those who provided assistance with completing this report. We appreciate the crucial role of industry trade associations, namely: Massachusetts Mortgage Bankers Association; Cooperative Credit Union Association; Massachusetts Bankers Association; and, the Massachusetts Community Banking Council, which provided numerous suggestions and also assisted with the coordination of our focus group sessions. Last but not least, many thanks to representatives from banks, mortgage companies, real estate agencies, and community organizations for participating in the various informational sessions and for providing important observations and guidance as part of the development of this report.

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I. INTRODUCTION

SECTION 61 of Chapter 228 of the Acts of 2018 requires the establishment of a Special Commission (Commission) to plan, develop, and implement strategies to support and promote minority-owned real estate and financial services organizations in the Commonwealth. SECTION 61 also directs the Commission to identify barriers to professional licensure for socially or economically disadvantaged persons including, but not limited to, barriers to obtaining mortgage lending and broker licenses, state bank charters, and insurance or carrier licenses.

The statute also requires the Commission to submit a report describing barriers and providing recommendations to the Clerks of the House of Representatives and Senate and to the Chairs of the House and Senate Committees on Ways and Means.

II. COMMISSION: MEMBERSHIP COMPOSITION

Representatives from the Massachusetts Division of Banks, the Massachusetts Division of Professional Licensure, National Association of Real Estate Brokers (NAREB), and two minority business entrepreneurs comprise the membership of this Commission.

Following are the members of the Commission:

- Ms. Mayte Rivera, Deputy Commissioner of the Division of Banks, as the designee of the Commissioner of Banks. The Division of Banks is the chartering authority for state-chartered banks and credit unions and the primary regulator of certain financial service providers in the Commonwealth.
- Mr. Sean Powers, Chief Operating Officer of the Division of Professional Licensure, as the designee of the Commissioner of the Division of Professional Licensure. The Division of Professional Licensure protects consumers by working to ensure the professionals that they hire comply with state licensing laws and regulations.
- Mr. Richard Phipps, representative of the Boston Chapter of the National Association of Real Estate Brokers (NAREB). NAREB is a professional real estate organization that includes membership from multiple disciplines in the real estate industry.
- Ms. Mary K.Y. Lee, Minority Business Owner
- Mr. Daniel Garcia-Decoteau, Minority Business Owner

III. METHODOLOGY FOR DATA COLLECTION

To accomplish its mission of gathering information from Commission members, industry, and community stakeholders, the Commission organized an initial meeting of members on November 21, 2019, followed by an informational session on January 7, 2020, and four focus group sessions on February 11, 2020.

The Commission's January 7, 2020 informational session was attended by members of the public, community organizations, and trade associations. Testimony was heard from representatives of the Massachusetts Mortgage Bankers Association, the Cooperative Credit Union Association, the Massachusetts Bankers Association, the Massachusetts Community & Banking Council, ACT Lawrence, and MassHousing. Written comments were received from ACT Lawrence, MassHousing, Mary K.Y. Lee, and Richard Phipps.

Drawing from commentaries provided during the informational session, the Commission organized focus groups on February 11, 2020 to seek additional input from representatives from banks, credit unions, the mortgage industry, and the real estate industry. Sessions lasted between 60-90 minutes and involved between two and five participants on each panel. Questions addressed licensing and charter application processes; any known barriers to the chartering process; minority recruitment and challenges to minority retention; and recommendations for improvement in referenced areas, particularly those impacting minority populations.

On March 10, 2020, the Commission reconvened to review the findings shared at the focus group event held on February 11, 2020. A discussion ensued regarding future recommendations for industry and government consideration. At this meeting, the Commission unanimously agreed to finalize its report, as presented herein.

IV. MINORITIES: NATIONAL AND NEW ENGLAND PERSPECTIVE

America is becoming an increasingly diverse nation. According to the 2018 U.S. Census Population Estimate Program and the American Community Survey, 76.5% of the population is White, while the remaining 23.5% is comprised of various minority racial groups. It is estimated that 18.3% of U.S. residents are Hispanics (Hispanics may be of any race and are also counted in other applicable race categories); 13.4% are Blacks; 5.9% are Asian; 1.3% are American Indians and 2.7% of the population is said to be represented by two or more race groups.¹

Hispanic and Latino Americans are New England's largest minority population, and they are the second-largest group in the region behind non-Hispanic European Americans. Hispanics and Latinos of any race made up 11.4% of New England's population, and there were nearly 1.7 million Hispanic and Latino individuals reported in the most recent U.S. Census American Community Survey.

Minority populations are critical drivers of the U.S. economy, yet they face numerous challenges in the labor force, such as wage gaps and underrepresentation in certain white-collar industries like finance and technology.

V. NATIONAL: MINORITY BUSINESSES

According to a 2012 survey of business owners by the U.S. Department of Commerce and compiled by the U.S. Census Bureau there were 7.95 million minority business enterprises (MBEs) in the United States. Minority business enterprises are found in all 50 states and the District of Columbia.²

¹ <https://www.census.gov/quickfacts/fact/table/US/IPE120218>

² https://www.mbda.gov/sites/mbda.gov/files/media/files/2019/mbdastateofminoritybusinessenterprises_2012data.pdf

The states of California, Texas, Florida, New York, and Georgia represented 59.1% of all U.S. MBEs and comprised 50.4% of the nation's total minority population in 2012. The predominance of these five states has remained unchanged since at least 2007.

In addition, the aforementioned 2012 MBE study shows that 41.2% of all startup firms in accommodation and food services are minority-owned – the highest share of any industry. Minority representation in professional, scientific, technical, information, and financial-related industries all fall below 25%, mirroring the larger employment gap that minorities face in white-collar industries.

MBEs are relatively clustered in the following industry sectors: Health Care and Social Assistance; Administrative and Support and Waste Management and Remediation Services; Transportation and Warehousing; Accommodation and Food Services; and Other Services.

Industry type for non-minority firms is more concentrated in other sectors such as Professional, Scientific, and Technical Services; Real Estate Rental and Leasing; and Finance and Insurance.

Gross receipts for minority enterprises have historically lagged behind levels of non-minority firms. The average gross receipts per MBE firm are \$1.3 million, based on the 2012 MBE survey in comparison to non-minority firms at an average of \$2.3 million.

In terms of constraints and challenges impacting minority and women-owned enterprises, a 2018 Morgan Stanley study found that while eight of ten investors perceive the funding landscape as balanced between Minorities and non-Minorities, investments in minority and women-owned ventures fall short by 80%. Researchers cite increased risk perception, as well as lack of access and familiarity with minority and women-led businesses as key drivers of what they referenced as the “Trillion-Dollar Blind Spot”.³

VI. MASSACHUSETTS: MINORITY BUSINESSES

According to the Commonwealth of Massachusetts Supplier Diversity Office, 1,305 minority firms are currently certified as minority Business Enterprises. Of this total, five are categorized as financial services and 71 as real estate related firms.

According to a *Boston Globe* article published in 2019, certified minority, women, veteran, and service-disabled small businesses earned a combined \$969,205,410 in direct business with the Commonwealth in fiscal year 2016 (a 1% increase over FY2015 with total earnings amounting to \$960,326,542).⁴

VII. FINANCIAL SERVICES ENTITIES: BACKGROUND, LICENSING, and STATE CHARTER REQUIREMENTS

As of February, 2020, the Massachusetts Division of Banks regulated 102 banks, 61 credit unions, 233 mortgage lenders, 338 mortgage brokers, and 8,145 mortgage loan originators.

³ <https://www.morganstanley.com/ideas/trillion-dollar-blind-spot-infographic/>. See *The Growing Market Investors Are Missing*: Morgan Stanley, 2018.

⁴ <https://www.bostonglobe.com/metro/2019/05/02/the-city-awarded-million-contracts-last-year-only-percent-went-minority-owned-businesses/K4Tt04GndWBF1MHdvipcNP/story.html>

For each respective financial service regulatory area, applicants must comply with various federal and Massachusetts laws and regulations in order to obtain a state charter or license across these industry sectors.

The following section will review licensing requirements for mortgage loan originators, mortgage lenders and mortgage brokers, and the basic requirements to obtain a bank or credit union charter under state law.

Depository Institutions (Bank and Credit Union Charters):

Banks

The de novo state banking charter application requires the identification of individuals who will serve as incorporators, members of the Board of Directors or Trustees, and executive officers of the bank. The application requires the submission of a business plan and stipulates an initial capital level of no less than \$8 million. Depending on preferred charter, applicants will also be required to complete applications with the FDIC and Federal Reserve System Membership⁵, and, possibly, with the Excess Deposit Insurer (Depositors Insurance Fund). There are three types of bank charters for depository institutions under state law: savings banks pursuant to M.G.L. c. 168, co-operative banks pursuant to M.G.L. c. 170, and trust companies pursuant to M.G.L. c. 172.⁶

Credit Unions

The state credit union charter application, pursuant to M.G.L. c. 171, must include description of the proposed field of membership and plans for membership growth, describe the convenience and needs of the membership to be served by the credit union, list all other state or federally-chartered credit unions for which potential members may presently be eligible, provide information on banking facilities in the sphere of operation of the proposed credit union, identify the proposed management of the credit union, provide a physical description of any site for the credit union, and describe the initial capitalization of the credit union.⁷ The applicant will be asked to submit a three-year business plan with financial projections for the credit union and must address how it will comply with the Community Reinvestment Act, M.G.L. chapter 167 section 14. Applicants are also subject to federal requirements mandated by the National Credit Union Administration.⁸ In addition, there is an excess deposit insurer for credit unions in the Commonwealth, the Massachusetts Credit Union Share Insurance Corporation (MSIC), which requires all state-chartered credit unions with excess deposits to be members.

⁵ <https://www.fdic.gov/formsdocuments/interagencycharter-insuranceapplication.pdf>

⁶ [Trust Company - BBI Supplement to the Interagency Charter Application-Trust Company Charter](#)

⁷ [Application to Establish a Credit Union](#)

⁸ <https://www.ncua.gov/support-services/credit-union-resources-expansion/chartering>

Non-depository Institutions:

Mortgage Lenders

To get a license to conduct business as a mortgage lender or mortgage broker in Massachusetts, an individual or entity must fulfill the requirements under M.G.L. chapter 255E and Massachusetts regulation 209 CMR 42.00.⁹

Specifically, a mortgage lender license is required of any company or sole proprietorship who engages in the business of making mortgage loans, or issues commitments for mortgage loans on Massachusetts residential property.

A mortgage applicant is required to submit detailed, supporting information to demonstrate financial responsibility and maintain a net worth of not less than \$200,000.¹⁰

Mortgage Brokers

A mortgage broker is any person who for compensation or gain, or in the expectation of compensation or gain, directly or indirectly negotiates, places, assists in placement, finds or offers to negotiate, place, assist in placement or find mortgage loans on residential property for others.

Each mortgage broker applicant must submit its application through the NMLS, and include the following information: Applicants are required to demonstrate financial responsibility and maintain a net worth of not less than \$25,000.¹¹

Mortgage Loan Originators

In order to conduct the mortgage lending and brokering business, at least one licensed Mortgage Loan Originator (MLO) must be employed by the company. Detailed MLO license requirements are found in M.G.L. c. 255F and 209 CMR 41.00. A range of fees also applies to the MLO licensing process.¹²

Real Estate Brokers and Salespersons:

The requirements for licensing of real estate brokers and salespersons is set by the Board of Registration of Real Estate Brokers and Salespersons, within the Division of Professional Licensure.¹³

A real estate broker negotiates agreements to sell, exchange, purchase, rent or lease interests in real property for a fee, commission or other valuable consideration for another person. A broker is

⁹ <https://www.mass.gov/how-to/apply-for-a-mortgage-lender-or-mortgage-broker-license>

¹⁰ Financial and business requirements include: Balance Sheet, an Income Statement, a Statement of Cash Flows, and a Statement of Changes in Stockholder's Equity, and all relevant notes thereto. Applicants must also demonstrate character and fitness, business experience, and must submit any other information that the Commissioner deems necessary. Applicants are also required to provide a bond of at least \$100,000 and a maximum of \$500,000.

¹¹ Financial and business requirements include: including a Balance Sheet, Income Statement, Statement of Cash Flows, and a Statement of Changes in Stockholders' Equity, and all relevant notes thereto. Applicants must also demonstrate character and fitness along with business experience. Applicants are required to provide a bond of \$75,000.

¹² Fees: License fee: \$500; Investigation Fee: \$115; NMLS Initial Processing Fee: \$30; Credit Report Fee: \$15; FBI Criminal Background Check: \$36.25; Approximately \$200 for pre-licensure education; Licensing exam: \$110.

¹³ <https://www.mass.gov/real-estate-brokers-and-salespersons-licensing>

responsible for accepting and escrowing all funds, such as a deposit placed on the purchase of a home, and for finalizing transactions. A real estate broker must supervise any transactions conducted by a salesperson.

A real estate salesperson engages in the same activities as a broker, except completing the negotiation of any agreement or transaction. A salesperson also has no authority or control over escrow funds.

The sales application requires 40 hours of real estate education and the successful completion of licensing exams, while the broker application requires three years of experience working for a broker, 40 additional hours of real estate education, and the successful completion of licensing exams.

VIII. BARRIERS TO ENTRY

Based on the information provided through meeting discussions, oral and written testimony, and focus groups, the following are several common themes which were raised with regard to minority business ownership and advancement in the financial services and real estate sectors in the Commonwealth. A sampling of several common themes is provided below:

- **Capital/Initial Investment.** Depending on the industry, the initial business investment may require potentially millions of dollars in capital, or the posting of hundreds of thousands of dollars in bonds to meet licensing or state charter requirements. Raising capital was recognized as one of the most challenging concerns for individuals seeking to establish a credit union or a minority-controlled bank. Access to financing was mentioned as a crucial need warranting consideration by government and private institutions. It was noted that it takes a long period of time to generate profitable returns. Focus group participants repeatedly stated it takes between one to three years for an individual to be trained or for their leads to start to generate a profitable return. Limited income during this initial “seed” period is extremely difficult to overcome without some financial support. This lag time in business sustainability has affected the degree of interest in banking and in real estate careers, particularly among minority individuals.
- **Regulatory Burden.** Participants noted some turnover in the mortgage lending sectors. A representative from the mortgage lending industry explained it is very challenging to sustain a business while attempting to develop expertise on all compliance rules. This feedback was echoed by other respondents who also agreed that the degree of regulatory knowledge needed to establish a business is almost too unfeasible to meet by disadvantaged business owners.

According to MassHousing, a quasi-public finance agency in Massachusetts, minority business owners find it difficult to overcome the layers of compliance requirements. Hiring fully trained staff with expertise in regulatory requirements across service and business areas was noted as being extremely costly and challenging, thereby providing an insurmountable barrier for business entry for some who aspire to this profession.

With regard to depository institutions, a credit union panelist offered another consideration to be factored when establishing a bank or a credit union: a successful institution must have risk and compliance management expertise to ensure financial institutions are financially stable and compliant with the range of regulatory requirements.

- **Financial and Credit Reports.** With respect to barriers impacting access to capital, having good credit was stated as an important consideration for access to venture capital and business loans. While credit is understood to be a reasonable underwriting consideration, the Commission was informed that unpreventable personal events unrelated to credit behavior, such as a death in the family, medical emergencies, or divorce, may adversely affect one's credit. Large student loans were also cited as another factor which can impact credit scores.
- **Language Barriers.** Respondents representing banks and credit union sectors explained that language may make it very difficult for certain minority groups to receive financial services in languages other than English.

Mortgage licensing exams and other related legal documents are generally presented in English. Focus group participants also highlighted what they considered to be poor wording of examination questions, *e.g.*, the use of double negatives, thus, adding to the overall complexity of licensing examinations. The use of confusing language may have an outsized impact on those who are not native English speakers.

- **Networking.** Limited professional networks and mentorship programs for minorities seeking to apply for licenses across sectors was mentioned several times as a factor with adverse consequences for business sustainability and access to capital. Commenters observed that although minority communities are very unified, there are limited networking options in certain business sectors for minority individuals seeking licensing or venture capital advice.

IX. RECOMMENDATIONS

Through the testimony and focus group process, several recommendations emerged which could help break down the identified barriers that minorities face when entering the financial services or real estate industries.

- **Capital.** In order to assist minority-owned banks, a bank representative noted that at the state level there is a need to expand state programs which allow a certain portion of state deposits to be moved to qualified community banks. The commenter's recommendation was to establish a requirement for state agencies and municipalities to deposit a certain percentage of their deposits in minority-owned banks to help with the necessary capital to grow these institutions. For example, the State Treasurer's office runs an existing program

for community banks which could be explored and/or tailored for minority-owned institutions.¹⁴

Creating venture funds through partnerships between municipalities, banks, credit unions, and community development organizations may be another possible strategy to generate bridge financing for entrepreneurs and minority small business owners. See *Five Lenders Launch Venture Fund to Help Brockton Entrepreneurs*¹⁵, Banker and Tradesmen article (March 5, 2020).

Grants and technical assistance were mentioned as an option for individuals seeking to establish credit unions. See the **List of Resources on page 12** for support services available through the National Credit Union Administration.

Moreover, applying for a state-certification, such as a minority business enterprise designation, may link business owners to state procurement contracts which could result in increased revenues and business expansion. The State's Supplier Diversity Office (SDO) is an important resource which can link business owners to bidding opportunities. See the **List of Resources** for more details regarding SDO.

As a critical tool for new and established minority businesses, the Commission received comments that the certification process may be improved for easier web-based access. Feedback from participants encouraged the Commonwealth to explore ways to highlight this important resource whether through online webinars or webcasts in collaboration with other purchasing and procurement organizations across the Commonwealth, such as COMMBUYS (the Commonwealth of Massachusetts online portal for statewide contracts).

- **Regulatory Burden.** One possible way to address regulatory burden is to review both state and federal regulatory requirements in order to help reduce confusion and procedural redundancies. Additional comments encouraged the Commonwealth's licensing agencies to review licensing examination materials as there may be examination requirements or testing questions which could be streamlined or clarified for better access.
- **Mentorships.** Submitted testimony and focus group participants emphasized the importance of mentorships among industry professionals. One focus group participant mentioned having friends who took the mortgage origination test four times without success, while another friend with a mentor passed it on the first attempt. Establishing mentorship programs with possible connections to industry trade groups, high schools, or colleges and universities may be a viable option for mentoring collaborations.
- **Improve Industry Compensation Options.** Establishing employer-employee arrangements to offer transition income for individuals just starting careers within the

¹⁴ <https://www.mass.gov/small-business-banking-partnership>

¹⁵ <https://www.bankerandtradesman.com/banks-launch-fund-to-help-brockton-entrepreneurs/>

banking, mortgage lending, or real estate sectors was mentioned as important consideration to address the concern around the limited income stream for minority apprentices.

A representative from a banking institution confirmed that his bank offers a fixed compensation package for new employees entering into retail lending positions.

- **Education and Training.** Education and training were topics of several recommendations. Specifically, a Commission member's written testimony recommends practical and tactical training options for minority business owners. This could help individuals learn how to develop business plans, draft marketing plans, and learn basic information technology.

Participants from the focus groups mentioned that agencies should consider using social media tools such as online videos or apps to deliver training and resource materials to make information more accessible and easier to understand.

Written testimony from a nonprofit participant explained the need to educate the youth about financial careers and ways to succeed within the financial services and real estate industries through practical courses in business and in ethics. The representative explained that pilot programs at high schools may improve minority recruitment efforts and retention rates at banks, credit unions, and mortgage lending companies.¹⁶

Networking. Focus group attendees recommended that minority groups consider establishing strong organizational networks with a range of funders, industry groups, and professional entities to help build the necessary net worth and capital base necessary for their business. Individuals interested in entrepreneurship and in building business connections, should explore annual trade networking events held by some of these organizations and agencies: Massachusetts Small Business Development Centers; U.S. Small Business Administration; and Chambers of Commerce. Also, social media portals designed to assist with learning about business opportunities, and career opportunities maybe another vehicle for minorities to expand their networking channels.

Lastly, the MassHousing Diversity and Inclusion Department offers networking opportunities for direct business-to-business access. Diverse business owners meet one-on-one with representatives from property management companies in order to present their goods and services and pitch their businesses based on their own strengths. Diverse business owners are selected for a "matchmaking" session based on the expressed contracting needs of the management companies. MassHousing also plans and facilitates two annual trade fairs which allow MBEs/WBEs to showcase their goods and services to management companies, developers, general contractors, state procurement officers, housing related businesses, and MassHousing staff. Finally, MassHousing also offers small business capacity building workshops to enhance the operational capabilities of MBEs/WBEs. By developing programs such as the one MassHousing offers, minority entrepreneurs and

¹⁶ [Pilot Training Program for Youth, See Act Lawrence.](#)

professionals can develop networks and skills to break down barriers included in this report.¹⁷

- **Industry Outreach.** Focus group participants stated that a general lack of awareness of the opportunities in the financial services and real estate industries. Focus group participants stressed a need to emphasize increased diversity efforts, particularly to be encouraged by boards of directors across industry sectors, so that such efforts are validated throughout all levels of management and the organization at large. With improved industry outreach within minority communities, there will be an increase in minority representation in both the financial services and real estate sectors.
- **Other considerations:** Understanding the overarching need for business capital, the Commission discussed the need for a ‘capacity building’ guarantee fund as another alternative for minority entrepreneurs with limited assets and equity to qualify and secure large scale development projects. Such fund would require further research and consideration by a range of policy-makers across the Commonwealth.

X. LIST OF RESOURCES

Following is a list of organizations and resources for minority individuals and business owners considering businesses in financial services.

- **Certification by the State’s Supplier Diversity Office:** Resource of certification options for a range of business types including minority business enterprise certification.¹⁸
- **Capital:** List of organizations and agencies with possible financing and capital options:
 - *Massachusetts Growth Capital Corporation:* an organization which provides financing to small business owners.¹⁹
 - *Local Initiatives Support Corporation in Boston:* A nonprofit that provides small business loans in the range of \$1,000 to \$1 million, and are accessible to many businesses that might not qualify for a traditional bank loan.²⁰
 - *U.S. Small Business Administration:* The SBA works with lenders to provide loans to small businesses. The agency doesn’t lend money directly to small business owners. Instead, it sets guidelines for loans made by its partnering lenders, community development organizations, and micro-lending institutions.²¹

¹⁷ [Diversity & Inclusion](#)

¹⁸ <https://www.mass.gov/how-to/apply-for-diversity-certification-as-a-massachusetts-based-business>

¹⁹ <https://www.empoweringsmallbusiness.org/who-we-help/small-business-owners>

²⁰ <https://www.lisc.org/boston/our-work/economic-opportunity/small-business-support/>

²¹ <https://www.sba.gov/funding-programs/loans>

- **Training:** List of organizations which provide training resources:
 - *Massachusetts Small Business Development Network:* A statewide resource which provides one-to-one business assistance and free or low-cost educational training programs to prospective and existing small businesses throughout the Commonwealth.²²
 - *Massachusetts Supplier Diversity Office:* A state agency which assists buyers and vendors of the Commonwealth with state procurement options.²³
 - *National Credit Union Association Minority Depository Institution Preservation:* A federal organization which provides assistance to individuals applying for minority Depository Institution credit union certification.²⁴
 - *Federal Deposit Insurance Corporation Minority Depository Institutions Program:* A federal organization which provides technical assistance to individuals applying for minority Depository Institution bank certification.²⁵
 - *City of Boston, Office of Small Business Development:* This division within the City's Economic Development office assists individuals and small business owners with technical assistance, specialized certifications, and training services.²⁶

²² <https://www.msbdc.org/>

²³ <https://www.mass.gov/supplier-diversity-office>

²⁴ <https://www.ncua.gov/support-services/credit-union-resources-expansion/resources/minority-depository-institution-preservation>

²⁵ <https://www.fdic.gov/regulations/resources/minority/mdi.html>

²⁶ <https://www.boston.gov/departments/small-business-development>

APPENDIX 1

Special Commission to Plan, Develop, and Implement Strategies to Support and Promote minority-Owned Real Estate and Financial Services

Focus Group Event: February 11, 2020

QUESTIONS FOR FOCUS GROUP PARTICIPANTS

I. BANKS

1. Are you familiar with the state charter application process? Explain.
2. Do you know of barriers to establishing a bank charter in Massachusetts? Explain.
3. Do you know of barriers specifically affecting minorities interested in opening a bank and applying for a state charter? Explain.
4. How would you describe minority recruiting efforts for lending officers, commercial bankers, and executive-level banking positions?
5. Are you familiar of any challenges in the area of minority recruitment, particularly for lending officers, commercial lenders, and executive-level banking positions? Explain.
6. What possible recommendations do you have to improve the state charter application process specifically for minority individuals? What possible recommendations do you have to ensure their successful applications?
7. What possible recommendations do you have to improve minority recruitment efforts specifically to improve representation of minorities in the banking sector in Massachusetts?
8. Any additional comments or remarks from the panel or from the public on these questions or topics?

II. CREDIT UNIONS:

1. Are you familiar with the credit union state charter application process? Explain.
2. Do you know of barriers to establishing a credit union charter in Massachusetts? Explain.

3. Do you know of barriers specifically affecting minorities interested in opening a credit union and applying for a state charter? Explain.
4. How would you describe minority recruitment efforts for lending officers, commercial lenders, and executive-level credit union positions?
5. Are you familiar of any challenges in the area of minority recruitment, particularly for lending officers, commercial lenders, and executive-level credit union positions? Explain.
6. What possible recommendations do you have to improve the state charter application process specifically for minority applicants? What possible recommendations do you have to ensure their successful applications?
7. What possible recommendations do you have to improve minority recruitment efforts specifically to improve representation of minorities in the credit union sector in Massachusetts?
8. Any additional comments or remarks from the panel or from the public on these questions and topics?

III. MORTGAGE INDUSTRY: MORTGAGE LENDERS/ORIGINATOR AND BROKERS

1. Are you familiar with the licensing application process for mortgage lenders/originators and mortgage brokers? Explain.
2. Do you know of barriers to obtaining a mortgage lender license/originator or a mortgage broker license? Explain.
3. Do you know of barriers affecting minority applicants (mortgage lenders/originators or brokers)? Explain.
4. How would you describe minority recruiting efforts for minority mortgage lenders/originators or for minority mortgage brokers?
5. Are you familiar of any challenges in the area of minority recruitment, particularly related to mortgage lenders/originators or minority mortgage brokers? Explain.
6. What possible recommendations do you have to improve the minority mortgage lender/originator and mortgage broker application process? What possible recommendations do you have to ensure their successful applications?

7. What possible recommendations do you have to improve minority recruitment efforts specifically to improve representation of minority mortgage lenders/originators and mortgage brokers?
8. Any additional comments or remarks from the panel or from the public on these questions and topics?

IV. REAL ESTATE: AGENTS AND BROKERS and OTHER PARTICIPANTS

1. Are you familiar with the licensing application process for real estate agents? Explain.
2. Do you know of barriers to obtaining a real estate agent or broker license? Explain.
3. Do you know of barriers affecting minority applicants? Explain.
4. How would you describe minority recruiting efforts for real estate agents and brokers?
5. Are you familiar of any challenges in the area of minority recruitment, particularly related to real estate agents or real estate broker recruitment efforts? Explain.
6. What possible recommendations do you have to improve the real estate agent or broker application process for minority applicants? What possible recommendations do you have to ensure their successful applications?
7. What possible recommendations do you have to improve minority recruitment efforts specifically to improve representation of minority real estate agents and brokers?
8. Any additional comments or remarks from the panel or from the public on these questions and topics?