

# Comerica Incorporated

Transforming Compliance to Competitive Advantage through AAP Services and Diversity Insights

Comerica

## Industry

Commercial Financial Services

## Client Since

2004

## Challenge

- AAP preparation overburdened the workforce compliance team.
- Manual tracking of diversity metrics resulted in redundant reporting efforts.
- HR and executive leadership needed visibility of diversity across the organization.
- Company sought to extend the value of workforce data insights beyond regulatory compliance.

## Solutions

- Affirmative Action Planning Services
- Diversity Benchmarking, Analysis, and Reporting
- Pay Equity Studies

## Impact

- Outsourcing AAP preparation frees up compliance team for strategic planning.
- Configurable diversity reports meet the needs of multiple stakeholders.
- Centralized diversity analytics enable total visibility across the talent lifecycle.
- Reliable metrics and routine monitoring maintain momentum toward diversity goals.

**Headquartered in Dallas, Texas, Comerica is a financial services company with three strategic business segments: Business Bank, Retail Bank, and Wealth Management.**

**The company operates more than 400 banking centers in the U.S. and additional locations in Canada and Mexico.**

**With more than 8,000 employees, Comerica is among the 25 largest U.S. financial holding companies.**

Comerica has a long history of investing in the value of diversity in its workforce, business and community outreach, and supplier base.

Since 2004, the bank has relied on Affirmity (previously operating as PeopleFluent) to support its affirmative action program. Today, that support extends beyond compliance, guiding Comerica's award-winning diversity initiatives through meaningful metrics and robust reporting.



## Turnkey Planning Services for Audit-Ready AAPs

As a financial services company, compliance is vital to Comerica's operations.

With Affirmity's AAPlanner software, the bank has long been able to automate plan preparation and ensure its AAPs are 100% technically compliant. But it took months of effort to gather and reconcile workforce data, conduct the required analysis, and prepare narratives.

To free up its workforce compliance team to focus on strategic planning, Comerica elected to outsource AAP generation to Affirmity's expert consultants.

Today, Affirmity produces audit-ready AAPs for all Comerica locations in less than 60 days and manages all aspects of AAP development, including

- **Data cleansing and reconciliation**
- **Plan development, reporting, and monitoring**
- **Adverse impact analysis**
- **Compensation analysis**
- **Narrative preparation.**

Our consultants serve as an extension of Comerica's team, always available to answer questions and ensure the compliance team is fully prepared in the event of an OFCCP audit.

We also contribute ongoing training to its compliance and HR teams, delivering multiple webinars each month on good faith efforts, recruiting compliance, and other important regulatory issues.

***Outsourcing our AAP preparation allows our team to take a more strategic and comprehensive look at our hiring practices. Now, we can meet with talent acquisition and our HR partners to conduct a more detailed review of data on underutilization or adverse impact, for example, and identify where we might need additional emphasis and programs.***

- Lori Walker

Vice President, Senior Diversity & Inclusion Consultant, Comerica

## Using Data to Drive an Award-Winning Diversity Program

For Comerica, compliance and diversity are paramount and mutually reinforcing commitments, and the company invests in initiatives that go beyond minimum requirements.

For example, Comerica engages Affirmity statisticians to conduct comprehensive pay equity studies—establishing baseline data, reviewing compensation variables, and monitoring their efforts to ensure employees receive equitable pay. These studies include company-wide and state-focused analyses, to ensure full compliance with all applicable laws governing equal pay.

The bank also looks to Affirmity for assistance with reporting against diversity initiatives. Our experts helped Comerica's HR team eliminate the need to replicate compliance data in reports prepared for executive leadership.

Today, Comerica relies on a single source for workforce data, prepared by our experts, for both compliance and diversity reporting.

With consistent and accurate data, Comerica gains total visibility of workforce diversity across the organization and at each stage in the talent lifecycle. Its HR and business leaders use the data to drive and track initiatives to foster a diverse and inclusive workplace.

In recognition of their successful program, in 2017 and 2018 Comerica was ranked by DiversityInc® among the top 10 regional companies for diversity.

## Fostering Executive Accountability for Diversity

At Comerica, accountability for diversity resides with the CEO and executive leadership team. Using data insights prepared by Affirmity experts, the company creates Diversity Involvement Scorecards that capture a leader's success in

- **Workforce diversity**
- **Business outreach**
- **Social impact**
- **Compliance and risk.**

Within each category, the scorecard shows specific metrics—such as hiring, promotions, and retention—to track progress toward diversity goals across all business units.

Powered by Affirmity's analytics and at-a-glance reporting, Comerica can target training and organizational change where needed and foster accountability at the highest level.



## Building and Empowering a Diverse Workforce

In partnership with Affirmity experts, Comerica uses the insights derived from analyzing employee data to weave diversity programs and awareness through all aspects of the organization. The bank trusts our team to support its affirmative action and diversity programs through meaningful metrics, rigorous analysis, and robust reporting.

We celebrate and support Comerica's commitment to building and empowering a diverse workforce, and to expanding its services and outreach within diverse communities.

***Diversity in workforce representation and utilization is key to our D&I strategy. With Affirmity's help, we've built years of solid data on hiring, promotions, and other metrics, and we're able to clearly articulate to our executive leadership how we're progressing toward goals.***

- Nathaniel Bennett

Senior Vice President, Chief Diversity Officer and Head of Talent Acquisition, Comerica

### Your Workforce Compliance and Diversity Solution

Find out how Affirmity can help your organization optimize affirmative action and D&I programs with expert consulting, data analysis, training, and software.

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### About Affirmity

Affirmity provides a robust portfolio of software, consulting services, and blended learning solutions that help global enterprise and mid-market companies build inclusive workforces so that they can experience long-term business value, while minimizing workforce compliance risk, from their DE&I and affirmative action programs.

Drawing on more than 45 years of experience, our software, learning solutions, and team of experts guide HR, diversity, and compliance teams to easily analyze diversity across the organization, identify gaps and insights into causes, establish and execute goals, and continually track DE&I and affirmative action program effectiveness over time.

A part of [Learning Technologies Group plc \(LTG\)](#), Affirmity serves more than 1,100 organizations.

For more, visit [affirmity.com](http://affirmity.com).