

Part II:

Recruitment, Hiring, and Retention Initiatives

A first step to combating systemic bias in corporate America requires a focus on the entry point to the workforce—a company’s recruitment and hiring policies and practices. Research prepared by the National Opinion Research Center at the University of Chicago found that Black people represent fewer than 1% of Fortune 500 CEOs, and only 3.2% of executives and senior manager-level employees at large U.S. companies.¹ Research on racial discrimination in hiring since 1990 shows that Black and Latino applicants experience greater bias than White applicants at various points throughout the hiring process. For example, a review of 54,000 applications found that White applicants received significantly greater callbacks than Black and Latino applicants with identical resumes: on average, White applicants received 36% more callbacks than Black applicants and 24% more callbacks than Latino applicants.² Hiring rates have not changed in any significant way since 1990.

In addition to a focus on recruitment and hiring, companies can reduce systemic bias against Black people by adopting initiatives aimed at retaining and promoting the development of Black employees and leadership. Once hired, Black professionals are more likely to encounter prejudice and microaggressions than any other racial or ethnic group, experience a lack of support from managers, and fall victim to a cycle of prejudice.³ Organizations can work to combat systemic bias in the recruitment, hiring, and retention of Black individuals by implementing certain steps, including:

- **Broaden the applicant pool.** Initiatives focused on increasing diversity in applicant pools can also directly affect a company’s ability to improve the recruitment and hiring of Black employees. Research suggests that where there are at least two underrepresented candidates in a final applicant pool, the likelihood that the underrepresented candidate will be hired increases significantly. The study examined hiring results among 598 candidates for academic jobs where the finalist pool ranged from three to 11 candidates (the average was four).⁴ The odds of hiring a minority candidate were 193.72 times greater if there were at least two minority candidates in the finalist pool.⁵ This was the outcome irrespective of the finalist pool size (e.g., six, eight, etc.).⁶ As such, companies would be well-served by partnering with executive talent pipelines and diversity-focused recruiters because these entities have direct access to talented Black candidates. Partnerships with talent pipelines and diversity-focused recruiters will help ensure that companies expand outreach and increase the likelihood that diverse candidates will apply for a particular role.

- **Establish a standardized interview and selection process.** Research suggests that maintaining structured interview processes helps reduce disparities in hiring and limits the prevalence of social stereotypes about applicants that influence hiring decisions. Coupling standardized interview processes with other tools to ensure fair hiring procedures—a diversity-focused pre-hiring selection process, revising language in job postings to be more inclusive, and adjusting compensation to be based on fair market rates—will help companies to curb bias in hiring.
- **Reduce social isolation.** Black professionals are generally at higher risk of social isolation and attrition, but companies can address these issues through formal mentoring programs and Employee Resource Groups, increasing employee visibility (e.g., more opportunities for internal and external presentations, networking, public speaking, and participating on committees), programs that analyze and address factors that drive attrition, and providing various mechanisms for employees to raise issues and concerns that allow companies to detect and address potential bias and related problems early.

Companies stand to benefit financially by implementing many of these inclusive initiatives. Such practices provide companies with a competitive advantage in an increasingly global economy. A 2017 Boston Consulting Group study identified diversity as a key driver of innovation and found that diverse teams provide 19% more revenue.⁷ A study in Harvard Business Review of venture capitalist professionals determined that diversity improves financial performance: “Thriving in a highly uncertain competitive environment requires creative thinking in those areas, and the diverse collaborators were better equipped to deliver it.”⁸ But the systematic exclusion of diverse groups denies companies the opportunity to compete and lessens a chance for financial success.⁹ Diversity maximizes business performance in other ways: inclusive teams make better business decisions up to 87% of the time, and decisions made and executed by diverse teams deliver 60% better results.¹⁰ As such, companies should think critically about fostering diverse and inclusive workplaces—which begins with front-end recruiting and hiring processes and continues with retaining and promoting the development of Black individuals.¹¹

Broaden the Applicant Pool

Companies remain responsible for ensuring that the sources from which they recruit and hire are not structured in a biased way. Initiatives focused on increasing diversity in sourcing, screening, and selecting candidates can directly affect a company's ability to improve the recruitment and hiring of Black employees. The EEOC has advised that companies should **recruit from racially diverse sources to ensure that the applicant pool reflects the diversity of the qualified labor force**. For example, where a company needs to address a lack of Black candidates in a recruiting pool, the EEOC has advised that, if an employer's primary recruitment source is a university that has few Black students, the employer should adopt other recruitment strategies, such as also recruiting at predominantly Black colleges.¹² Particularly important are long-term strategies that tap into sustainable pipelines of talent.

Historically, some companies have excused their inability to meet diversity goals by pointing to what they deem a lack of qualified Black talent from which to recruit. Wells Fargo's CEO made such a pronouncement in June 2020, stating: "[w]hile it might sound like an excuse," the company's lack of diversity was the result of "a very limited pool of Black talent."¹³ Broad, generalized statements such as these are harmful and are often not borne out by the data. The lack of Black professionals in corporate executive roles or on corporate boards is frequently not due to a lack of preparation but to a failure on the part of the organization to ensure access to opportunities for advancement for Black candidates.¹⁴

Establishing Strategic Partnerships to Expand the Diverse Talent Pool

Strategic partnerships with programs that host diversity networking events, pipeline programs, and recruiters focused on representing and advancing diverse communities provide companies with ongoing opportunities to tap into talented pools of Black candidates.¹⁵ Corporations should consider which partnerships will yield the best results, how an association's mission aligns with the company's goals, values, and culture, and whether an association's membership is the appropriate talent source.¹⁶ Consider the following types of strategic partnerships below.

First, at the heart of a company's strategic approach to enhancing its talent pipeline should be establishing or expanding participation in the development of institutions that are likely to have diverse talent pools, such as historically black colleges and universities ("HBCUs") and other historically diverse academic institutions. For example, in 2019, PwC hosted the inaugural HBCU Faculty Forum for HBCU faculty members and PwC partners and staff—a tool that provides significant institutional support of HBCUs.¹⁷ Launched with the goal of strengthening PwC's relationships in the HBCU community, PwC's HBCU forum serves a number of purposes: (1) PwC leadership facilitated discussions with the faculty about the importance of HBCUs in the company's national recruiting strategy and how to incorporate the critical skills HBCU students need into existing curriculum of the various HBCUs; (2) PwC provides HBCU professors with free access to hands-on upskilling opportunities that in turn allow faculty to better prepare students for their future careers; (3) PwC offers scholarships to assist students in overcoming the hurdles associated with the growing cost of education, including recently awarding \$150,000 in HBCU scholarships; and (4) PwC continues to work with signatories to the CEO Action for Diversity and

Inclusion initiative to plan events to promote the pipeline of talent from HBCUs and strengthen connections between HBCU deans and executives of leading companies.¹⁸

Second, companies can identify talented prospective Black candidates through **sponsorship and participation in diversity networking events, job fairs, and special-interest websites**. Research has found, for example, that five years after a company implements a college recruitment program that targets female employees, the proportion of White, Black, Hispanic, and Asian-American women in management rises by 10%.¹⁹ Programs focused on diversity recruitment experience an increase of Black male managers and Black female managers by 8% and 9%, respectively.²⁰ Activities that may attract Black candidates include:

- Partnerships with associations that represent women and diverse groups;
- Sponsorship and participation in national diversity networking events, including diversity conferences;
- Presence at diversity job fairs, including fairs for Black students or other underrepresented groups; and
- Online recruitment and job postings through special-interest focused job websites.

Third, expanding the pool of qualified candidates can be aided by **partnering with executive talent pipelines**, such as INROADS²¹, Management Leadership for Tomorrow (MLT)²², Sponsors for Educational Opportunity (SEO)²³, the Consortium for Graduate Study in Management²⁴, Calibr Global Leadership Network²⁵, and the Executive Leadership Council²⁶, to identify highly qualified Black executives.

Finally, in order to create repeated opportunities to identify diverse candidates, companies can **establish a relationship with recruiters that prioritize, or work exclusively with, diverse candidates**. Informing recruiters of diversity-related goals and instructing recruiter-partners to present diverse candidate pools can also aid companies in sourcing a diverse range of candidates.

Reducing Unconscious Bias in the Applicant Pool

Maintaining a diverse slate of qualified candidates—in particular, more than a single diverse candidate in the final applicant pool—can significantly increase the likelihood that a diverse individual will be hired.²⁷ A study by the University of Colorado’s Leeds School of Business found that when companies included only a single woman or historically underrepresented person in an applicant pool, there was a zero percent chance that the applicant would get the job.²⁸ But a hiring committee has a 50/50 chance of selecting a non-White or female applicant if the applicant pool is half non-White or female.²⁹ Being the only diverse candidate in a pool of finalists highlights this individual as different, and decisionmakers may implicitly view deviating from the norm as risky because there is a tendency to ostracize people who are from different groups.³⁰ But when hiring a Black candidate is perceived to be the status quo (i.e., the pool included two Black candidates and one White candidate), individuals who scored average in unconscious racism tended to rate a

Black candidate 10% better than the White candidate.³¹ Therefore, companies should consider requiring **that final applicant pools include multiple diverse candidates.**

Businesses in the finance, technology, legal, and sports industries have implemented rules attempting to increase the number of diverse candidates in an applicant pool:

- Under the Rooney Rule, updated in May 2020, NFL hiring managers are required to interview at least two external diverse candidates during the hiring process for vacant head coaching roles, and at least one diverse candidate for vacant offensive, defensive, or special-teams coordinator roles (i.e., a company’s leadership might specify to recruiters that there must be at least two candidates from underrepresented groups on a position shortlist).³²
- In 2019, Goldman Sachs announced a policy requiring managers to interview two new diverse candidates for any open position. Specifically, half of all new analyst and entry-level associate candidates must be women. For the first time, the company issued additional targets for Black and Latino hires.³³
- Walmart similarly reported in its 2019 Culture, Diversity & Inclusion report that it has established an officer (VP and above) selection protocol to create a consistent and objective selection process, such as including at least three candidates on each internal and external slate with at least one candidate being a woman and/or person of color.³⁴
- More than 100 major law firms signed onto the Mansfield Rule, which measures whether law firms have affirmatively considered at least 30 percent women, lawyers of color, LGBTQ+ lawyers, and lawyers with disabilities for leadership and governance roles, equity partner promotions, formal client pitch opportunities, and senior lateral positions.³⁵ Research suggests that the 30% requirement is the critical mass necessary to disrupt biases.

Companies should consider memorializing these protocols in company policies to ensure more opportunities for Black people to “get in the door” and to interview for key roles. But the inclusion of Black candidates on interview shortlists should not be merely perfunctory. Instead, companies should couple policy requirements with bias training for hiring managers – as discussed in [*Part I: The Building Blocks of a Diverse Workplace – Understanding Bias and Aligning Incentives to Values*](#) – to ensure that potential individual bias does not serve as an obstacle to creating a more inclusive workforce.

Establish a Standardized Interview and Selection Process

Initiatives that allow for a **fair and standardized interview process will help mitigate bias in the interview process**. For example, making job postings more inclusive, using pre-hiring selection platforms, facilitating structured interviews that allow a company to obtain the same baseline knowledge about candidates, and recommending salaries based on fair market rates will help ensure that companies are interviewing with an eye toward inclusion.

Make Job Postings More Inclusive

Research conducted by the Harvard Business Review found that job descriptions can and do alienate potential candidates when the description insufficiently focuses on the expectations of the role and instead includes limiting language (e.g., potentially gendered language such as “outspoken,” “competitive,” “nurturing,” or “loyal”) or language that may discourage diverse or unconventional applicants (e.g., a requirement that an applicant have two-years’ experience if that experience is not actually required for the job). For example, a report published by LinkedIn on how words impact men and women in the workplace found that 44% of women would be discouraged from applying for a role if the description included the word “aggressive.”³⁶ This means that companies should consider **removing from job descriptions potentially exclusionary language and unnecessary requirements that could be barriers to underrepresented groups**. Enlisting technology solutions to review job descriptions, as the companies below have done, can also allow companies to efficiently avoid some of these issues.

- Google has described its efforts to reduce bias in job descriptions via a tool that analyzes the text in job descriptions to remove words or phrases that could bias a candidate from an underrepresented group against applying.³⁷
- Cisco uses data science and the Textio Hire app to identify potentially problematic words or phrases in job descriptions and suggest language that will attract more diverse applicants.³⁸
- Slack has focused on removing bias from the interview process by utilizing technology to analyze potentially biased language in job descriptions that would rebuff female candidates. Its talent acquisition strategy also includes clearly defining candidate criteria, asking interviewees the same question, and favoring a blind code review that wipes all personal identifiers from a candidate’s interview work product, as well as recruiting from coding bootcamps focused on historically underrepresented groups.³⁹

Establishing a Standardized Interview Process

Pre-selection or pre-employment assessments can be used to evaluate traits or characteristics about a candidate’s fitness for a position. Such platforms should require companies to **focus on a candidate’s qualifications** rather than allowing implicit bias concerning a candidate’s racial or ethnic background to potentially influence the process. For example, KPMG, Netflix, Uber,

Peloton, Booking.com and Heineken are among companies using pre-hiring assessments created by Harver to do just that.⁴⁰ The Harver platform is equipped with 15 customizable modules—from culture fit, language, and multitasking, to personality, cognitive ability, and typing skills—and allows hiring managers to create situational judgement tests to show candidates what to expect from the job while evaluating how the candidate reacts in certain situations.⁴¹ KPMG noted that after using the recruitment platform, the company increased the number of female hires by 44%.⁴²

Companies that **implement a structured process for interviews** can also reduce disparities and limit the opportunities for social stereotypes about applicants to guide interviews.⁴³ Research suggests that unstructured interviews that lack defined questions are often unreliable for predicting job success. In comparison, structured interviews that ask all candidates the same set of questions minimize bias and allow employers to “focus on the factors that have a direct impact on performance.”⁴⁴ The EEOC has also advised that companies should attempt to standardize interview questions to help avoid discrimination or limit liability.⁴⁵ Companies have already begun to consider following this model. TD Ameritrade’s Kate Healy, a managing director who works to promote initiatives to attract underrepresented groups in the finance industry, recommends that companies adhere to a pre-scripted series of questions when interviewing prospective hires.⁴⁶ She also recommends establishing a panel of at least three interviewers to guard against unconscious bias when hiring.⁴⁷

Blind hiring—or removing information like a job applicant’s name, gender, religion, or academic qualifications like GPA from resumes—also reduces bias during the talent acquisition process.⁴⁸ Rather than evaluating a candidate’s academic details, employers should assess candidates based on skills testing or sample projects, then select the top performers to participate in interviews.

Adjusting Compensation-Setting Policies

Recommending salaries based on fair market rates instead of compensation from a prior job can also curb bias. A recent study suggests that setting a new hire’s salary using prior compensation data perpetuates inequities. Research by James Bessen, a Boston University economist, found that Black employees in states that have made it illegal to ask candidates about prior salary saw a 13% pay increase.⁴⁹ But use of prior salary history provides employers with a “bargaining advantage”—with knowledge that an applicant is underpaid, an employer may offer only slightly more than an applicant’s current pay. To remedy concerns that an employer should know salary history to ensure that a new offer is commensurate with prior pay, employers might include a salary range with a job posting to allow applicants to self-select whether a range is acceptable when deciding whether to apply.⁵⁰

Reduce Social Isolation of Black Employees

Companies can also promote retention and development by reducing the social isolation experienced by Black employees and supporting the development of their professional networks.

One study found that Black women were less likely than non-Black coworkers to interact with senior leaders and receive support from their managers (e.g., showcasing work, advocating for new opportunities). Additionally, less than a quarter of Black women reported feeling that they have the sponsorship needed to advance their careers.⁵¹

Supporting the creation and funding of Employee Resource Groups can reduce the social isolation of Black employees. Studies have shown that Black employees receive informal mentoring through these groups, which aid in retention and internal mobility.⁵² **A formal mentoring program** may also help companies retain, engage, and develop diverse talent, and Black talent in particular.⁵³ One study found that organizations' formal mentoring programs increased the representation of women and people of color in management by 9% to 24% on average, with some of the largest increases in leadership positions among Black women.⁵⁴ Another study also found that mentoring programs improved promotion and retention rates for underrepresented groups.⁵⁵ To develop a healthy pipeline of Black talent, companies can prioritize career development and mentorship—

- Microsoft relies on mentoring and support networks for employees from underrepresented groups, including internal networks and partnerships with outside organizations to connect employees to communities of professionals that can help give a sense of belonging and opportunity.⁵⁶
- General Motors encourages a mentoring program through Employee Resource Groups (“ERGs”), in which participants are assigned to small group mentoring cohorts that engage with leaders on career development, complete at least one community service team activity, and discuss a leadership book. General Motors reports that the program gives the company a competitive advantage in attracting, developing, and retaining Black employees.⁵⁷

Retention equity programs can also help reduce attrition rates, which are generally higher among Black professionals.⁵⁸ Retention equity programs analyze and address factors contributing to higher attrition rates, and allow companies to intervene and provide support—such as connecting employees with the right resources, training, and community—before employees leave the company. Retention equity programs can help offset the cost of recruitment,⁵⁹ and studies also show that engaging employees boosts productivity.⁶⁰

Expanding the visibility of a larger number of diverse employees, such as through more opportunities for presentations at internal meetings and external conferences, can also help facilitate Black employee engagement and reduce bias. Research indicates that enhanced visibility can counteract stereotyping and tokenism of underrepresented groups over time.⁶¹

Providing a clear process for employees to address bias and related problems, including mechanisms for employees to raise concerns around discrimination, may help with employee

retention and promotion. A fear of retaliation may deter Black employees from reporting problems through a formal complaint system, which may cause bias and related problems to go undetected, fester, and ultimately increase attrition rates among Black employees. By providing employees with access to a variety of mechanisms for them to raise concerns—such as Employee Assistance Plans (“EAPs”), ombuds offices, and transformative dispute resolution systems—companies can intervene early, provide support and guidance to employees, resolve problems, and promote the retention of Black employees.⁶²

Endnotes

-
- ¹ Being Black in Corporate America, Center for Talent Innovation, December 2019; Curtis Bun, “[Blacks in Corporate America Still Largely Invisible, Study Finds](#),” *NBC News*, December 11, 2019.
- ² Lincoln Quillian, Devah Pager, Armin H. Meindl, and Ole Hexel, “[Hiring Discrimination Against Black Americans Hasn’t Declined in 25 Years](#),” *Harvard Business Review*, October 11, 2017.
- ³ Id.
- ⁴ Lydia Dishman, “[Why Your Single Minority Candidate Has Statistically No Chance of Being Hired](#),” *Fast Company*, April 28, 2016.
- ⁵ Id.
- ⁶ Stephanie K. Johnson, David R. Hekman, and Elsa T. Chan, “[If There’s Only One Woman in Your Candidate Pool, There’s Statistically No Chance She’ll Be Hired](#),” *Harvard Business Review*, April 26, 2016.
- ⁷ Rocio Lorenzo, Nicole Voigt, Miki Tsusaka, Matt Krenz, and Katie Abouzahr, “[How Diverse Leadership Teams Boost Innovation](#),” January 23, 2018, Boston Consulting Group.
- ⁸ Paul Gompers and Silpa Kovvali, “[The Other Diversity Dividend](#),” *Harvard Business Review*, July-August 2018.
- ⁹ [Best Practices of Private Sector Employers](#), U.S. Equal Employment Opportunity Commission (website); Sheryl Lyons, “[The Benefits of Creating a Diverse Workforce](#),” *Forbes*, September 9, 2019; Paul Gompers and Silpa Kovvali, “[The Other Diversity Dividend](#),” *Harvard Business Review*, July-August 2018.
- ¹⁰ Erik Larson, “[New Research: Diversity + Inclusion = Better Decision Making At Work](#),” *Forbes*, September 21, 2017.
- ¹¹ Paul Gompers and Silpa Kovvali, “[The Other Diversity Dividend](#),” *Harvard Business Review*, July-August 2018.
- ¹² [Questions and Answers about Race and Color Discrimination in Employment](#), U.S. Equal Employment Opportunity Commission.
- ¹³ Imani Moise, Jessica DiNapoli, Ross Kerber, “[Exclusive: Wells Fargo CEO Ruffles Features With Comments About Diverse Talent](#),” *Reuters*, September 22, 2020.
- ¹⁴ Crystal E. Ashby, “[There is No Shortage of Black Talent in Corporate America](#),” *Fortune*, June 18, 2020.
- ¹⁵ “[Collaborating with Associations to Tap a Diverse Talent Pipeline](#),” Diversity Best Practices.
- ¹⁶ Id.
- ¹⁷ Rod Adams, “[How a Diverse Talent Pool Leads to Better Tech Talent](#),” September 25, 2019, LinkedIn.
- ¹⁸ Rod Adams, “[How a Diverse Talent Pool Leads to Better Tech Talent](#),” September 25, 2019, LinkedIn.
- ¹⁹ Frank Dobin and Alexandra Kaley, “[Why Diversity Programs Fail](#),” *Harvard Business Review*, July-August 2016.
- ²⁰ Id.
- ²¹ Since 1970, INROADS has aided businesses in gaining greater access to diverse talent, and in placing students at internships in organizations across the country. The organization, from its inception, has had the goal to increase ethnically diverse employees in corporate management in the U.S. [INROADS](#) (website).
- ²² The Management Leadership for Tomorrow program partners with organizations to expand talent pipelines at more than 120 businesses, universities and social-sector organizations. The organization has supported more than 8,000 MLT leaders since its inception. These leaders represent high-achieving women and men from underrepresented African American, Latino, and Native American communities. [MLT](#) (website).
- ²³ The Sponsors for Educational Opportunity program dedicated to providing underserved and underrepresented communities with access to superior educational and career opportunities. The organization offers four programs: SEO Scholars, SEO Career, SEO Law, and SEO Alternative Investments. [SEO](#) (website).
- ²⁴ The mission of the Consortium for Graduate Study in Management is to “enhance diversity and inclusion in global business education and leadership by striving to reduce the significant underrepresentation of African Americans, Hispanic Americans and Native Americans in both our Member Schools’ enrollments and the ranks of global management.”
- ²⁵ The Calibr Global Leadership Network is a leadership development organization that collaborates with companies as a strategic talent development partner. The organization seeks to accelerate senior leadership readiness for mid-to senior level managers and executives of African descent. [Calibr](#) (website).
- ²⁶ Founded in 1986, the Executive Leadership Council (ELC) is an organization committed to increasing the number of global Black executives in C-Suites, on corporate boards and in global enterprises. The organization seeks create

channels of opportunity for Black executives to continue to make impact in business and in the community. [Executive Leadership Council](#) (website).

²⁷ “[The State of Black Women in Corporate America](#),” 2020, Lean In.

²⁸ Stephanie K. Johnson, David R. Hekman, and Elsa T Chan, “[If There’s Only One Woman in Your Candidate Pool, There’s Statistically No Chance She’ll Be Hired](#),” *Harvard Business Review*, April 26, 2016.

²⁹ Id.

³⁰ Id.

³¹ Id.

³² The original Rooney Rule required teams to interview only one diverse candidate for head coach positions. The NFL updated the rule in 2020 to improve what has become an unacceptable record of diverse hiring in positions of team leadership. Dan Graziano, “[NFL approves Rooney Rule changes, tables minority hiring incentives](#),” *ESPN*, May 19, 2020.

³³ Liz Hoffman, “[Goldman Sachs Implements Its Own ‘Rooney Rule’ in Diversity Push](#),” *Wall Street Journal*, March 18, 2019; Hugh Son, “[Goldman Sachs Says Half of All the Junior Bankers It Hires Must Be Women](#),” *CNBC*, March 19, 2019.

³⁴ Walmart, [Culture, Diversity & Inclusion 2019 Report](#).

³⁵ Mansfield Rule 4.0 Participating Firms, [An Open Letter from the 4.0 Firms’ Chairs & Managing Partners](#), Diversity Lab.

³⁶ Sarah O’Brien, “[How to Recruit More Women to Your Company](#),” *Harvard Business Review*, November 28, 2019.

³⁷ Google, [Diversity Annual Report 2020](#).

³⁸ Id.

³⁹ Danielle Agugliaro, “[24 Companies with Standout – And Effective – Diversity Recruiting Strategies](#),” *RippleMatch*, May 24, 2021; Jessica Nordell, “[How Slack Got Ahead in Diversity](#),” *The Atlantic*, April 26, 2018.

⁴⁰ “[How KPMG NL Transformed Its Recruitment Process and Increased the Number of Female Hires by 44%](#),” Harver.

⁴¹ Id.

⁴² Id.

⁴³ Miriam Rozen, “[US Financial Advisers Struggle to Overcome their Lack of Racial Diversity](#),” *Financial Times*, July 30, 2020.

⁴⁴ Rebecca Knight, “[7 Practical Ways to Reduce Bias in Your Hiring Process](#),” *Harvard Business Review*, June 12, 2017.

⁴⁵ [Best Practices of Private Sector Employers](#), U.S. Equal Employment Opportunity Commission (website).

⁴⁶ Miriam Rozen, “[US Financial Advisers Struggle to Overcome their Lack of Racial Diversity](#),” *Financial Times*, July 30, 2020.

⁴⁷ Id.

⁴⁸ Daniel Bortz, “[Can Blind Hiring Improve Workplace Diversity?](#)” *SHRM*, March 20, 2018.

⁴⁹ Sarah Green Carmichael, “[Next Steps for Companies that Pledged to Do Better on Diversity](#),” *Bloomberg*, August 4, 2020; James Bessen, Erich Denk, and James Kossuth, “[Stop Asking Job Candidates for Their Salary History](#),” *Harvard Business Review*, July 14, 2020.

⁵⁰ Id.

⁵¹ “[The State of Black Women in Corporate America](#),” 2020, Lean In.

⁵² Diversity Best Practices, [Employee Network and Affinity Groups](#), 148-176.

⁵³ David Thomas, “[The Truth About Mentoring Minorities, Race Matters](#),” *Harvard Business Review*, April 2001.

⁵⁴ Frank Dobin and Alexandra Kalev, “[Why Diversity Programs Fail](#),” *Harvard Business Review*, July-August 2016.

⁵⁵ Ka itlyn Conboy and Chris Kelly, “[What Evidence is There that Mentoring Works to Retain and Promote Employees, Especially Diverse Employees, Within a Single Company?](#)” Cornell University, Fall 2016.

⁵⁶ [Diversity & Inclusion Report 2019](#), Microsoft.

⁵⁷ [Diversity & Inclusion Report](#), 2019, General Motors.

⁵⁸ Center for Talent Innovation, “[Being Black in Corporate America](#),” December 2019.

⁵⁹ Accenture, “[New Accenture research finds leaders and employees hold differing views on progress toward equality](#),” March 5, 2020.

⁶⁰ Jim Harter and Annamarie Mann, “[The Right Culture: Not Just About Employee Satisfaction](#),” *Gallup*, April 12, 2017.

⁶¹ David Pedulla, “[Diversity and Inclusion Efforts That Really Work](#),” *Harvard Business Review*, May 12, 2020.

⁶² Id.