

Federal Housing Finance Agency--Proposed Rule: RIN 2590-AA28

While the Federal Housing Finance Agency's goal of promoting the inclusion of minorities and women is a commendable goal, the creation of an Office of Minority and Women Inclusion in each regulated agency and in the Office of Finance is not the proper means. Particularly in this time of an announced budgetary freeze and the constant desire for governmental efficiency, the creation of a mandatory office in many agencies is simply an expansion of unwieldy bureaucracy.

The duties and responsibilities assigned to the Office of Minority and Women Inclusion are all capable of being completed by a more centralized agency, like the Equal Employment Opportunity Commission, on a more centralized and national level. Each smaller agency engaging in the same diversity-oriented work, while admirable, just adds an extra level of red tape to agency action. Centralized governmental recruiting, which currently often takes place at agency-wide fairs and through the USAjobs.gov website, is a more visible and unified approach that is capable of being used to rectify minority hiring disparities. These recruiting means are a much more cost-effective and efficient way to achieve the FHFA's stated goals. By proffering concerted effort to achieve diversity goals, the existing methods can be utilized and the creation of an additional bureaucratic structure is unnecessary.

One of the major perception problems plaguing the government is its lack of efficiency. By relying on an existing governmental agency and simply coordinating efforts, rather than generating additional overhead, the government can take one small step to curb excessive bureaucratic growth.

Since the economy is currently in shambles, mandating the creation of a new office in all FHFA regulated agencies seems like a partial solution in that it will generate new employment opportunities. This view, however, is a nearsighted one. With a budgetary freeze, the money that would be required to fund these new offices would likely be taken from other programs or offices, thereby eliminating other jobs. The creation of some jobs while destroying other jobs does not facilitate the economic growth needed in this nation.

The promotion of diversity within the various agencies is a valid interest; however, the inherent costs in the proposed implementation plan must be weighed. Instituting unwarranted bureaucracy will not help the cause. Furthermore, creating jobs without having any additional budgetary allocations will only shift allocations from other jobs and maintain as a constant the number of jobs. An Office of Minority and Women Inclusion in each regulated agency and the Office of Finance is unnecessary. There are far better, more cost-effective and already existing means by which diversity can be achieved.