

WORKFORCE PLAN

Fiscal Years 2027-2031



Texas Department of Banking
June 2026

Table of Contents

OVERVIEW	2
DEPARTMENT OF BANKING MISSION	3
AGENCY GOALS AND ACTION PLANS	3
Goal: Effective Bank and Trust Regulation	3
Actions Required to Achieve Goal.....	4
Goal: Effective Regulation of Non-Depository Supervision (NDS) Licensees	5
Actions Required to Achieve Goal.....	5
Goal: Effective Regulation Through Corporate Activities	6
Actions Required to Achieve Goal.....	6
Goal: Effective and Efficient Operations Compliant with State Laws	7
Actions Required to Achieve Goal.....	7
Anticipated Changes	8
CURRENT WORKFORCE PROFILE (SUPPLY ANALYSIS).....	9
Workforce Demographics	9
Department Workforce by Job Category	10
Employee Turnover	11
Retirement Eligibility and Return to Work Retirees.....	13
Veteran Workforce.....	13
FUTURE WORKFORCE PROFILE (DEMAND ANALYSIS)	14
Critical Functions	14
Expected Workforce Changes	14
Anticipated Increase in Employees Needed	14
Future Workforce Skills Needed	15
GAP ANALYSIS.....	16
Succession Planning, Retention and Recruiting	16
Anticipated Shortage/Surplus of Employees	17
Gap Analysis	19
STRATEGY DEVELOPMENT	20
Gap: Current employees need additional training to gain and retain critical skills.....	20
Gap: Attracting and retaining talented employees.	20
Gap: Leadership Development	21

Overview

The Department of Banking's (Department) mission is carried out primarily through chartering, licensing, examination, supervision, and consumer assistance. Regulated entities receive examinations and off-site monitoring to ensure they are operating in a safe and sound manner and complying with state and federal laws. The ability to adequately supervise the entities under the Department's jurisdiction requires that sufficient support be provided to our financial examiners, as well as the regulated entities through professionalism, technology, legal services, communication, and administrative services.

The Department is a Self-Directed, Semi-Independent (SDSI) agency operating under the oversight of the Finance Commission of Texas (FC). As an SDSI agency, the Department is not required to have its budget approved by the Legislature. The FC is responsible for setting the spending authority or limits for the agency each year.

The Department competes with financial service providers, other state agencies, and federal regulatory agencies for its professional examination staff. The agency is authorized to employ 236 full-time equivalent (FTE) employees and as of March 31, 2026, it employed 194 individuals, the majority of whom were financial examiners. The Bank and Trust Supervision Division is staffed with 102 field examiners and the Non-Depository Supervision Division is staffed with 19 field examiners. As of March 31, 2026, there are 34 vacant field financial examiner positions. The Department will monitor staffing levels to ensure it aligns with its needs given the quantity and complexity of its regulated entities. Following the recent departure of large, regulated entities from the state regulatory system will require the agency to reassess its staffing needs. Despite this change, there remains several vacancies that need to be filled in the Bank and Trust Supervision and Non-Depository Supervision Divisions.

The Department has worked diligently to reduce turnover and must continue its efforts to sustain a qualified workforce. Over the last 20 years, the Department's turnover rate has fluctuated but current levels are aligned with historical trends. Changes in the labor market along with the resignation trends in 2024 and 2025, heightened the importance of monitoring turnover and employee satisfaction. Challenges to both recruitment and retention include employees' increased desire to telework, the travel burden of the examiner position, and the high cost of living in the Austin area.

Historically, industry crises highlighted the need to retain well-trained and tenured staff to provide appropriate regulatory supervision during adverse events such as an economic downturn. The Department must be well positioned to handle these potential contingencies rather than become complacent during times of prosperity. The agency strives for examiner salaries that are comparable to the Federal Deposit Insurance Corporation (FDIC) counterparts. With SDSI status, the agency has had the ability to reasonably adjust salaries to remain competitive.

Offering competitive employment incentives and career opportunities remains a priority. Flexible work weeks and telework opportunities are requested benefits from staff and applicants for employment. While flexibility is still offered, the Department makes efforts to ensure there is an in-office staffing presence. Recent actions include leasing additional office space for two regional offices to provide adequate workspace for existing staff and the planned development of a new headquarters building.

Although the travel burden cannot be fully eliminated; the Department continually searches for avenues to reduce the amount of overnight travel and related staff turnover. The Department continues to provide examination staff with opportunities to conduct work offsite to reduce travel when appropriate. With that goal, the Department has implemented technological improvements in the agency's infrastructure over time, such as increased network bandwidth, information sharing through

SCHEDULE F: Agency Workforce Plan

the secure file exchange portal, and the use of Microsoft Teams to enhance the Department's information exchange capabilities, complementing a flexible work environment. In addition, leveraging technology such as the enhanced imaging methods used by regulated entities has allowed examination staff to access required documents for off-site review, further contributing to a reduction in travel.

The Department offers a Student Educational Employment Program (SEEP), which is a paid internship program in partnership with Texas A&M University, Sam Houston State University, Stephen F. Austin State University, Texas Tech University, and other Texas universities with dedicated banking, business technology, cybersecurity, FinTech, or other program that aligns with examination objectives. The purpose of the SEEP is to introduce students to a financial examiner career. Interns who are successful in the SEEP program (as evaluated by their supervisor) are offered employment as a Financial Examiner I upon graduation, contingent on positions being available and the student's ability to meet the minimum qualifications for the position.

Department of Banking Mission

The mission of the Department of Banking is to ensure Texas has a safe, sound, and competitive financial services system.

Agency Goals and Action Plans

The Department's mission is accomplished primarily by the examination and supervision of our chartered and licensed entities. To meet our goals and fulfill our mission, the Department will abide by these core values and operating principles:

- Adhere to the highest ethical and professional standards.
- Be statutorily accountable and responsible.
- Anticipate and respond to a dynamic environment.
- Identify and promote innovative practices.
- Operate efficiently and maintain consistent and prudent regulatory standards.
- Communicate effectively.
- Foster teamwork while encouraging individual excellence and career development.
- Provide a desirable work environment that values cultural and individual differences.
- Seek input from and be responsive to the public, our supervised entities, and State leadership.
- Adhere to the principle of "Tough but Fair" regulatory oversight.

Goal: Effective Bank and Trust Regulation

Ensure timely, fair, and effective supervision and regulation of financial institutions under our jurisdiction. The regulatory process promotes a stable banking and financial services environment and provides the public with convenient, safe, and competitive financial services. Provide quality regulation and maintain the credibility of the Department with the public, industries we regulate, federal banking regulators, and other government agencies.

Actions Required to Achieve Goal

- Conduct commercial bank, trust company, foreign bank agency, foreign bank branch, and foreign bank representative office (foreign bank organizations) examinations, in cooperation with the Federal Deposit Insurance Corporation (FDIC) and the Federal Reserve Bank (FRB), while conforming with the Department's examination priority schedule and in a thorough, accurate, and timely manner.
- Maintain contact with, and monitor the condition of, regulated entities between examinations through processes which include an off-site monitoring program. Continue to improve off-site monitoring processes by augmenting our management information systems (MIS).
- Research and report on changing industry, statutory, and economic conditions, and develop appropriate supervisory strategies to adapt to these changes.
- React timely and appropriately when needed to implement disaster preparedness plans and adjust to changing situations as applicable to continue providing effective oversight of regulated entities.
- Monitor industry status and engage in regular communication with federal regulators (FDIC and FRB) and the Conference of State Bank Supervisors (CSBS).
- Obtain feedback from regulated entities regarding proposed rule changes.
- Promote cybersecurity awareness and best practices among our regulated entities and employees.
- Maintain a cybersecurity tracking system and monitor remediation efforts associated with cybersecurity incidents reported by our regulated entities.
- Identify and investigate fraudulent activities and insider abuse.
- Ensure correction-oriented enforcement actions are taken, as appropriate, against regulated entities that demonstrate higher than normal weakness or risk, including consideration of noncompliance with laws, regulations, and policies.
- Maintain sufficient regulatory resources in the event of industry deterioration or systemic industry problems, the reallocation of federal regulatory resources away from Texas, or a significant increase in the regulated asset base.
- Attract and retain qualified employees through a competitive salary program, specialized training, and career advancement opportunities. Promote a culture of state service as a career.
- Optimize efficiencies in the examination process utilizing electronic examination tools and the Department's secure file exchange portal to share information with regulated entities and federal counterparts.
- Improve agency's technologies through the adoption of cloud offerings, where appropriate, and by ensuring current technologies are in use to support regulatory obligations and operations.
- Enhance the Department's examination procedures and scoping processes to effectively utilize examination resources for evaluating risks and risk management practices of our regulated entities.
- Provide regulatory and supervisory information through the agency's website.
- Maintain accreditation status by CSBS.

Goal: Effective Regulation of Non Depository Supervision (NDS) Licensees

Ensure timely, fair, and effective supervision and regulation of the non-depository licensees under our jurisdiction. The regulatory process promotes a stable financial services environment and provides the public with convenient, safe, and competitive financial services. Provide quality regulation and maintain the credibility of the Department with the public, industries we regulate, and other government agencies.

Actions Required to Achieve Goal

- Conduct Money Services Business (MSB), Prepaid Funeral Contract (PFC), and Perpetual Care Cemetery (PCC) examinations, in conformance with the Department's examination priority schedule and in a thorough, accurate, coordinated, risk-based, and timely manner. MSB examinations are conducted either independently or jointly with other state regulatory entities, or in cooperation with federal regulatory entities.
- Monitor the condition of regulated entities between examinations and make contact as needed. Continue to improve off-site monitoring processes by incorporating MSB Call Report data from Nationwide Multistate Licensing System (NMLS) and augment our management information systems (MIS).
- Monitor fluctuations in economic conditions, geopolitical risks, and inflationary pressures that will impact non-depository financial service providers.
- Strive to obtain appropriate funding to fully staff the division to meet examination needs and provide effective regulation of NDS licensees.
- Promote cybersecurity awareness and best practices among our employees, and regulated entities.
- Maintain a cybersecurity tracking system for cybersecurity incidents reported by MSBs.
- Actively participate in the Multi-State MSB Examination Task Force (MMET), Money Transmitter Regulators Association (MTRA), CSBS, and its various committees, to promote and improve the nationwide framework for cooperation and coordination among state regulators to ensure a uniform regulatory oversight of the MSB industry.
- Maintain MSB examination efficiencies through cooperation and coordination among states by developing uniform examination procedures and practices and actively participating in the standardization of a networked supervision approach. Participation in the MMET's multi-state networked supervision system conserves Department resources and minimizes the regulatory burden on supervised entities while achieving our objectives.
- Optimize efficiencies in the examination process utilizing available electronic examination tools and the secure file exchange portal to share information with regulated entities and other state regulators.
- Research, monitor, and report on changes to the industry, including statutory and economic conditions, and digital assets market evolutions. Develop appropriate supervisory strategies to adapt to these changes.

SCHEDULE F: Agency Workforce Plan

- Monitor the impact of federal legislation, including the GENIUS Act and the CLARITY Act, on licensed money transmitters and engage in regular communication with federal and state regulators.
- Collaborate and coordinate with federal and state regulators to provide clarity on federal regulatory changes that could impact the activities permitted by licensed MSBs.
- Coordinate with state and federal regulators to provide the industry with clarity on the authority and scope of federal preemption.
- Provide the industry with access to regulatory and supervisory information through the Department's website.
- Obtain feedback from license holders regarding proposed rule changes.
- Identify and investigate non-licensed entities and illegal activities.
- Ensure proper enforcement actions are issued against unlicensed entities to bring such establishments into compliance with rules and regulations.
- Ensure correction-oriented enforcement actions are issued against regulated entities that demonstrate systemic or significant noncompliance with rules and regulations independently or in coordination with other state regulators.
- Attract and retain qualified employees through a competitive salary program, specialized training, and career advancement opportunities. Promote a culture of state service as a career.
- Provide training opportunities to prepare for future succession of key roles.
- React appropriately when needed to implement disaster preparedness plans and adjust to changing situations as needed to continue to provide effective oversight of regulated entities.
- Maintain MSB accreditation status by CSBS.

Goal: Effective Regulation Through Corporate Activities

Provide an effective process to evaluate and act upon corporate filings requesting to initiate, expand, or modify financial services to Texans. In doing so, ensure that the prospective owners, managers, and operators of financial service entities are capable of offering citizens of Texas access to convenient, safe, sound, and competitive financial services.

Actions Required to Achieve Goal

- Process all filings in a timely and thorough manner while adhering to the principle of providing Texans with access to convenient and competitive financial services operating in a safe and sound manner.
- Optimize efficiencies in the application process by enhancing automated systems, where possible, to improve the quality and speed of information exchanged internally and between the Department, its stakeholders, applicants, and the various federal and state agencies that we partner with to process applications.
- Reduce dependencies on obsolete technologies through the adoption of cloud offerings where appropriate and by ensuring current technologies are in use to support regulatory obligations and operations.

SCHEDULE F: Agency Workforce Plan

- Perform thorough background checks as appropriate to determine if the individuals proposed have the experience, personal and financial integrity, and financial acumen to direct and/or lead a financial institution or MSB's affairs in a safe, sound, and legal manner.
- Attract and retain qualified employees through a competitive salary program, specialized training, and career advancement opportunities. Promote a culture of state service as a career.

Goal: Effective and Efficient Operations Compliant with State Laws

Ensure that Texans and stakeholders are effectively and efficiently served by high-quality professionals entrusted to implement regulatory requirements and industry standards, utilize advanced technologies, safeguard confidential information, provide educational opportunities to support and strengthen the financial services industry, and assist consumers in resolving complaints with the financial service providers regulated and licensed by the Department.

Actions Required to Achieve Goal

- Work with the Texas Facilities Commission to design and construct a new headquarters building to be completed in fiscal year 2028.
- Investigate, process, and respond to consumer complaints related to Department-supervised entities in a professional, appropriate, and timely manner.
- Modernize internal HR information system to improve managing and processing employee data, enhance core HR task like payroll and other employee actions..
- Develop a comprehensive annual budget and staffing plan.
- Adhere to the agency's annual budget.
- Update and test the Continuity of Operations Plan (COOP) as directed by the State Office of Risk Management (SORM).
- Promote information security and cybersecurity awareness within the agency through training and processes designed to protect sensitive data.
- Position the Department for continual modernization of MIS to support regulatory obligations and operations.
- Utilize technology to streamline processes throughout the agency.
- Engage in regular communication with and reporting to the FC.
- Prepare and deliver accurate SDSI agency reports to the Governor and Legislature in a timely manner.
- Attract and retain qualified staff and maintain professional service. Promote a culture of state service as a career.
- Promote financial education.
- Collaborate, when possible, with the Office of Consumer Credit Commissioner (OCCC) and Department of Savings and Mortgage Lending (DSML) on the FC's efforts to achieve greater efficiencies.

SCHEDULE F: Agency Workforce Plan

Anticipated Changes

- Specialized staff and training are necessary to assess chartered and licensed entities procedures and preparedness to prevent cybersecurity attacks and address the rapid emergence of new technology.
- Financial technology continues to change as new forms of payment systems arise, such as digital assets. Therefore, the Department must devote additional resources to evaluate emerging technologies and provide training to enhance the skillsets of staff for any new products and technologies.
- If banks, trust companies, and MSB's under the Department's supervision become larger and more complex, more resources will be required for staff development in areas related to digital asset technology.
- Large bank examinations require a higher level of expertise in the areas of target industry credit analysis, model and enterprise-wide risk management, capital planning and stress/shock testing.

Current Workforce Profile (Supply Analysis)

Critical Workforce Skills

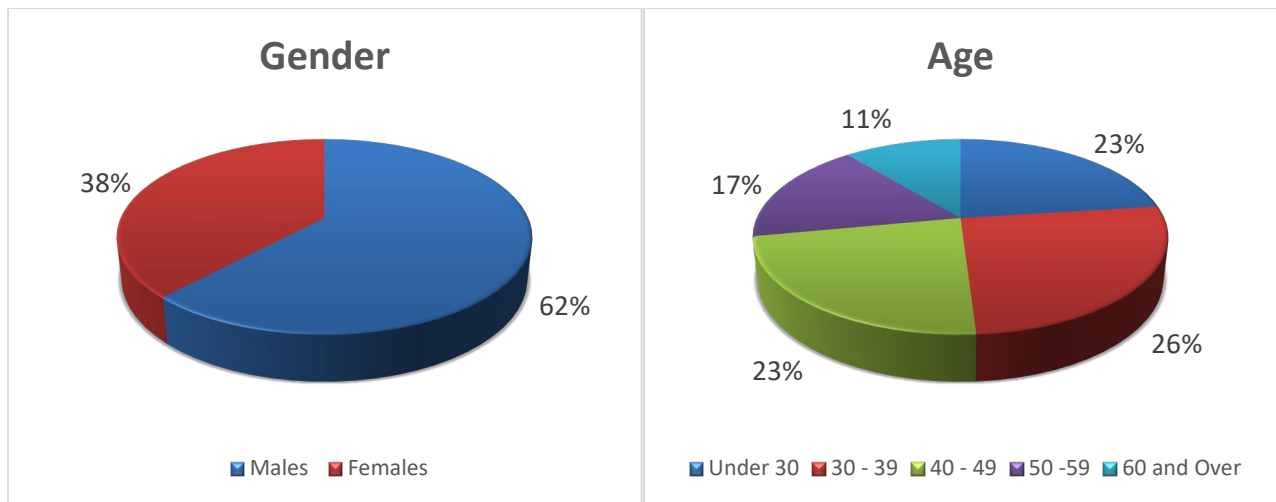
Several critical skills are vital to maintaining the Department’s ability to operate effectively and efficiently. Without these, the Department could not provide basic business and regulatory functions.

These skills include:

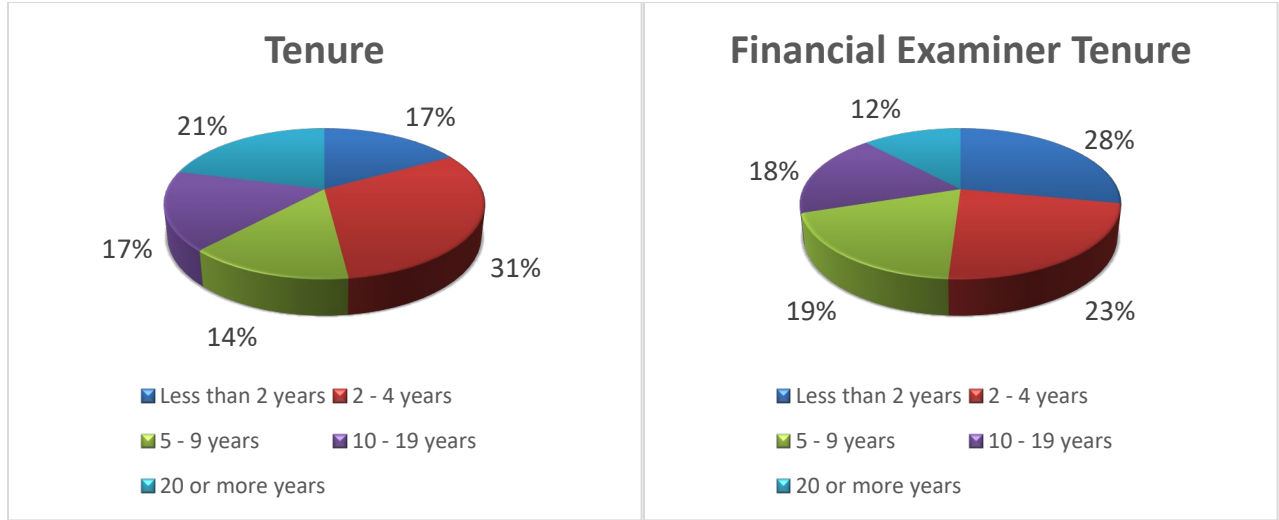
- Financial examination and regulatory experience.
- Specific regulatory expertise in capital markets, model risk management, trust operations, AML/CFT compliance, MSB activities, investigations, digital assets, and corporate governance.
- Customer service expertise.
- Information technology and cybersecurity expertise.
- Trust activities and financially related legal knowledge.
- Legal expertise.
- Human resources and financial management expertise.
- Programming, database development, and maintenance expertise; and
- Regulatory and accounting experience and expertise.

Workforce Demographics

The following chart profiles the Department’s workforce (as of March 31, 2026) of 194 individuals, which includes both full and part-time employees. The workforce is comprised of 62% males and 38% females. Approximately 52% of employees are over the age of 40 and approximately 50% have less than five years of Department service. Approximately 51% of financial examiners have less than five years of Department experience.



SCHEDULE F: Agency Workforce Plan



Department Workforce by Job Category

The following table compares the percentages of African American, Hispanic American, Female and Male Department employees, to the Statewide Civilian Workforce as reported by the Texas Workforce Commission’s (TWC) Civil Rights Division (Civilian labor force data is from the Equal Employment Opportunity (EEO) report FY 2024).

Workforce Demographics by Job Category – FY 2025								
Job Categories	African American		Hispanic		Female		Male	
	% DOB*	% TWC	% DOB	% TWC	% DOB	% TWC	% DOB	% TWC
Officials / Administrators	5.8%	9.1%	23.5%	26.5%	23.5%	41.3%	76.5%	58.7%
Administrative Support	12.5%	15.2%	25.0%	39.3%	93.8%	73.7%	6.3%	26.3%
Professionals	12.2%	11.7%	27.8%	23.3%	37.2%	53.8%	62.8%	46.2%
Technicians	10.0%	15.3%	20.0%	36.7%	10.0%	62.8%	90.0%	37.2%

Statewide Civilian Workforce Composition, 2023 1-year PUMS file from the American Community Survey (ACS), U.S. Census Bureau.

*DOB – Department of Banking

SCHEDULE F: Agency Workforce Plan

Employee Turnover

Overall Agency Turnover

Overall turnover has fluctuated over the last five fiscal years but has been generally lower than the State Turnover Rate. Excluding retirements, the overall turnover rate for FY 2024 was 9.3% and FY 2025 was 15.0%.

Due to non-work-related matters affecting departing staff and tenured employees entering retirement, retention efforts have become more challenging. The Department must remain vigilant in researching and refining retention methods, especially as the job market continues to change, as well as continuing to implement succession planning for the replacement of retiring employees.

Five Year Turnover		
Fiscal Year	Department Turnover Rate	State Turnover Rate
FY 2025	15.0%	15.4%
FY 2024	16.8%	16.5%
FY 2023	20.3%	18.7%
FY 2022	18.3%	22.7%
FY 2021	13.2%	21.5%

Information obtained from the State Auditor’s Office E-Class System including interagency transfers.

All Employee Turnover by Length of State Service – FY 2025			
Years of Service	# of All Department Employees	% of All Department Employees	% of Department Employee Turnover
Less than 2 years	54.25	27.2%	48.6%
2 – 5 years	33.25	16.7%	25.7%
5 – 10 years	24.50	12.3%	5.7%
10 – 15 years	26.00	13.0%	5.7%
15 – 20 years	20.50	10.3%	2.9%
20 years and over	40.75	20.5%	11.4%

Information obtained from the State Auditor’s Office E-Class System including interagency transfers.

Agency Turnover by Gender & Ethnicity

For FY 2025, the Department was comprised of 199.25 total employees. The charts below depict the turnover rate for gender and ethnicity for FY 2025.

SCHEDULE F: Agency Workforce Plan

All Agency Turnover by Gender – FY 2025

Years of Service	# of Employees	% of Employees	% of Turnover
Male	120.75	60.6%	51.4%
Female	78.50	39.4%	48.6%

Information obtained from the State Auditor's Office E-Class System including interagency transfers.

Agency Turnover by Ethnicity – FY 2025

Ethnic Category	# of Employees	% of Employees	% of Turnover
Asian	7.50	3.8%	2.9%
African American	24.50	12.3%	5.7%
Hispanic	54.50	27.4%	22.9%
Two or More Races	2.75	1.4%	5.7%
White	110.00	55.2%	62.9%

Information obtained from the State Auditor's Office E-Class System including interagency transfers.

Financial Examiner Turnover

The financial examiner series is the largest component of the Department's workforce. Turnover in this group is the costliest for the Department because examiners receive extensive professional training and direct supervision in the first five years of employment. This requires substantial monetary commitment by the Department.

As of August 31, 2025, 60% of financial examiners had less than ten years of state service. This group constitutes 75% of the financial examiner turnover for FY 2025. As of March 31, 2026, 80% of financial examiner turnover was for staff that had less than ten years of state service.

Financial Examiner Turnover by Length of State Service

Years of Service	# of Financial Examiners FY 25	% of Financial Examiners FY 25	% of Financial Examiner Turnover FY 25	# of Financial Examiners FY 26*	% of Financial Examiner Turnover FY 26*
Less than 2 years	41	29.1%	50%	37	50%
2 – 5 years	25	17.7%	21.4%	30	20%
5 – 10 years	18.5	13.1%	3.6%	25	10%
10 – 15 years	20.5	14.5%	7.1%	13	0%
15 – 20 years	14	9.9%	3.6%	11	20%
20 years and over	22	15.6%	14.3%	15	0%

Information obtained from the State Auditor's Office E-Class System including interagency transfers.

**FY 2026 data as of March 31, 2026*

SCHEDULE F: Agency Workforce Plan

Non – Financial Examiner Turnover

For FY 2026 through March 31, 2026, a majority of the turnover amongst non-examiner employees has been those employees with less than five years of service. In FY 2025, the majority of non-examiner staff resignations were also those with less than five years of service.

Non – Financial Examiner Turnover by Length of State Service					
Years of Service	# of Non-Examiner Employees FY 2025	% of Non-Examiner Employees FY 2025	% of Non-Examiner Turnover FY 2025	# of Non-Examiner Employees FY 2026*	% of Non-Examiner Turnover FY 2026*
Less than 2 years	13.25	22.7%	42.9%	11	100%
2 – 5 years	8.25	14.2%	42.9%	19	0%
5 – 10 years	6.00	10.3%	14.3%	9	0%
10 – 15 years	5.50	9.4%	0.0%	7	0%
15 – 20 years	6.50	11.2%	0.0%	4	0%
20 years and over	18.75	32.2%	0.0%	13	0%

Information obtained from the State Auditor’s Office E-Class System including interagency transfers.

**FY 2026 data as of March 31, 2026*

Retirement Eligibility and Return to Work Retirees

Management succession planning will continue to be a significant priority over the next five years, as approximately 32% of the agency’s staff, or 63 employees, will be eligible to retire, including five who are return-to-work retirees. Approximately 49% of the employees in the five-year period are eligible to retire in fiscal year 2026. Furthermore, 85% of managers will be eligible to retire in the next five years.

As of March 31, 2026, 14% of the Bank and Trust Division staff and 8% of the Non-Depository Supervision Division staff are eligible to retire or are return-to-work retirees who may leave at any time in fiscal year 2026. This overall anticipated loss of knowledge and expertise from so many potential retirees is a primary concern for the Department.

There were no retirements in FY 2025 that affected the Department’s turnover rate. However, this is expected to increase over the next biennium.

Veteran Workforce

Texas Government Code, Section 657.004 requires state agencies meet a veteran employment goal of hiring veterans in full-time positions to equal at least 20% of the total number of employees. Included in the law are requirements to interview a certain percentage of qualified veterans for each open position.

As reflected on the FY 2026 Second Quarter Veterans Workforce Summary, veterans represent 7.76% of the Department’s workforce and has improved over the two-year period. The Department continues to work to increase our veteran workforce through its competitive recruitment and selection processes.

Future Workforce Profile (Demand Analysis)

Identifying the future workforce requirements of the Department encompasses a broad range of factors which have been identified through the Department's strategic planning process, interaction and discussion with federal and state regulators, and input from agency management. The evolution of the financial services industry means the Department will need experienced and qualified professional staff to meet anticipated growth, complexity, and other changes in the industries regulated by the agency.

Critical Functions

- Increased IT examination activity for regulated entities and service providers.
- Increased demand on supervisory resources due to changes in national, regional, and local economic and regulatory conditions.
- Increased trust examination activity as the population ages and wealth management becomes more pronounced.
- Increased examination activity and supervisory responsibilities because of changes in products and technologies in the MSB industry.
- Increased need for personnel with regulatory experience with digital assets.
- Increased demand for legal expertise for the areas regulated by the Department.
- Implementation of new or modified regulatory requirements.
- Increased need for cybersecurity and technology experts.

Expected Workforce Changes

- Increased use of technology to maximize efficiency.
- Standardization of telework and work schedules that increase and optimize in office time.
- Increased use of subject matter specialists.
- Greater focus on audit programs, risk assessments, and problem resolution for regulated entities.
- Greater need to investigate unlicensed and/or illicit activity.
- Greater emphasis on cybersecurity and emerging technology.

Anticipated Increase in Employees Needed

- Number of new MSBs with more complex business plans and organizational structures licensed by the Department continues to increase.
- State-chartered banks under supervision continue to increase in size, services offered, and complexity.
- Changes to federal counterpart priorities and reallocation of examination resources.
- Increased training needs.

SCHEDULE F: Agency Workforce Plan

- Increase in need to replace tenured employees that are eligible for retirement.

Future Workforce Skills Needed

A competent and knowledgeable staff is necessary to supervise the various entities efficiently and effectively under the Department's oversight and to respond to changes in these industries. Employees must increase their knowledge and skills in the following areas:

- IT operations, change management, and cybersecurity risks relating to a wide variety of products and services offered.
- Changing technology and diversity of products offered, such as digital assets and Artificial Intelligence (AI).
- Financial crimes and risks.
- Project management.
- Investigations and fraud detection.
- Process analysis.
- Operational risk.
- Audit.
- Management and supervision of staff.
- Risk management, capital planning, and compliance with federal regulations.

SCHEDULE F: Agency Workforce Plan

GAP Analysis

Five Year Vacancy History

Vacancies	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
All Staff	31	32	32	28	43
Financial Examiner	17	23	16	17.5	36

Succession Planning, Retention and Recruiting

Historically, the agency has experienced high turnover with financial examiners within the first five years of employment, leaving a void in the number of examiners qualified to become mid-level examiners. The Department remains selective when hiring new talent and has designed scoring metrics based on factors that have led to historical success with current employees. These metrics are designed to provide a fair assessment of applicants and are continuously reviewed for effectiveness based on the longevity of existing employees and recent hires. While the Department has been able to maintain staffing levels for Financial Examiner I – III the last few years, the gap between entry level and mid-level workforce remains difficult to fill.

Contributing to the gap in mid-level workforce, there are few applicants for mid-level positions which require a certain level of skills and experience. Furthermore, additional time is needed to realize the benefits of the training program which is intended to expedite the advancement of entry-level staff. This has created a “bar bell” effect in financial examiner staffing levels. The need to recruit mid-to-senior level examiners or promote internally is vital in order to level out staffing amongst the financial examiner classifications. Further, senior management continues to face the challenges of having a high number of well-tenured financial examiners eligible to retire over the next five years and a shortage of mid-level examiners available to take their place.

Financial Examiner Staffing by Classification – March 31, 2026

Classification	# of Financial Examiners	% of Financial Examiners
Financial Examiner I	18	14%
Financial Examiner II	15	11%
Financial Examiner III	26	20%
Financial Examiner IV	6	5%
Financial Examiner V	9	7%
Financial Examiner VI	13	10%
Financial Examiner VII	23	18%
Financial Examiner VIII	21	16%

Information obtained from the State Auditor’s Office E-Class System including interagency transfers.

Additionally, the Department struggles with attracting specialized talent in the Austin area due to the high cost of living and related moving expenses. To allow internal employees the opportunity to try a

SCHEDULE F: Agency Workforce Plan

different role prior to committing, the Department opened a few temporary assignments for specialized positions located in Austin in 2025. This has proven to be a successful venture for staff looking to promote within the agency. The hands-on experience provides staff the opportunity to determine if the work and career change is a good fit before committing to a permanent move to Austin. As a smaller state agency, the opportunities for career advancement of the administrative staff are limited, and turnover of administrative staff remains an issue for the agency.

To continue to address the current and potential vacancies, the Department utilizes an expanded recruiting strategy. Dedicated Human Resources staff focus on engaging in active recruiting through CAPPS Recruit, LinkedIn and other online or application-based platforms, increasing attendance at university career fairs, creating employment marketing materials, enhancing the “Jobs” page on the Department’s website, and reducing the timeline from job postings to employment offer. In addition, Bank and Trust staff continue to conduct presentations at universities with banking school programs.

Although the Department has seen some success in hiring experienced examiners from external sources, the overall challenge will remain due to the specialized nature of the position. The Department continues to be successful, however, in attracting talent for entry level financial examiner positions. To provide the new hires with an opportunity for career development and advancement earlier in their career, an intense banking training program was implemented in June 2023 and has started to yield good results as assistant financial examiners are able to participate and produce quality work earlier in their careers. As of FY 2026, those who attended the June 2023 session have generally begun their commissioning journey sooner, which has improved efficiency and should improve employee retention. The Department intends on continuing the training program to build up its workforce.

Retaining employees and encouraging them to make their employment with the agency a career is critical to the Department’s success. The Department has adapted to the changing workforce and has made efforts to improve the work-life balance aspect of the job. Examinations, when appropriate, are conducted offsite allowing some personnel to work remotely to reduce travel and commute time. The Department continues to evaluate options to increase automation to make processes more efficient and continue striving for salaries that are comparable to FDIC counterparts.

Over the next five years, the Department will continue to focus on recruiting and retention efforts.

Anticipated Shortage/Surplus of Employees

- Recruiting experienced examiners is a significant challenge.
- Executive management retirements within the next five years will require cross training of senior staff members to allow for continuity during the transitional period.
- An increase in assets or large institutions under supervision will call for additional seasoned and experienced staffing.
- A significant downturn in the state’s economy will require more field examinations and time reviewing a regulated entity’s financials and records.
- An increase in fraud investigations or enforcement actions would call for additional staffing or contracted investigators.
- An increase in technology and cybersecurity needs will require additional IT examination staff.
- Legislative mandates associated with digital assets may require additional staff to properly regulate entities offering these products.

SCHEDULE F: Agency Workforce Plan

- An increase in the number of MSB opinion requests, new license applications, change of control filings and examinations require expanded legal, corporate, and examiner resources.
- The Department anticipates a loss of knowledge and skills due to retirements in the next five years.
- Continued expansion of cryptocurrency and other digital asset technology warrants additional staffing as regulated entities expand into these products and services.

SCHEDULE F: Agency Workforce Plan

Gap Analysis

The Department’s analysis of the current FC approved FTEs and anticipated workforce needs are presented in the chart below.

Gap Analysis March 31, 2026															
Division	Executive			Professional			Technical			Administrative			Total		
	Authorized	Need	Gap	Authorized	Need	Gap	Authorized	Need	Gap	Authorized	Need	Gap	Authorized	Need	Gap
Executive/Admin	2	2	0	1	1	0	0	0	0	1	1	0	4	4	0
Legal	0	0	0	8	7	-1	0	0	0	2	2	0	10	9	-1
Admin Services	0	0	0	7	6	-1	0	0	0	0	0	0	7	6	-1
Human Resources	0	0	0	4	4	0	0	0	0	0	0	0	4	3	-1
IT	0	0	0	1	1	0	11	12	1	0	0	0	12	13	1
Division of Strategic Support	0	0	0	5	5	0	0	0	0	4	3	-1	9	8	-1
Corporate Activities	0	0	0	7	7	0	0	0	0	2	2	0	9	9	0
Bank Supervision	0	0	0	111	102	-9	0	0	0	6	6	0	117	108	-9
Foreign Bank Supervision	0	0	0	1	1	0	0	0	0	0	0	0	1	1	0
Trust Company / Department Supervision	0	0	0	12	12	0	0	0	0	0	0	0	12	12	0
IT Examinations	0	0	0	20	20	0	0	0	0	0	0	0	20	20	0
PFC / PCC	0	0	0	9	9	0	0	0	0	2	2	0	11	11	0
MSB	0	0	0	18	20	2	0	0	0	2	2	0	20	22	2
Total Dept of Banking	3	3	0	204	196	-8	11	12	1	18	18	0	236	226	-10

Strategy Development

Gap: Current employees need additional training to gain and retain critical skills.

Goal: Develop a competent, well-trained workforce.

Rationale: The presence of a well-trained workforce is critical not only to the success of the Department, but also to the credibility of the agency and condition of the industry. The success of the Department is not only measured by how well it meets its goals and objectives, but the level of credibility it maintains with its state and federal counterparts. The level of credibility maintained by the Department has a direct correlation on the cost of supervision and regulation to regulated entities. A loss of credibility could result in a higher volume and more frequent supervision by federal regulators and therefore increase regulatory burden upon the supervised businesses operating in Texas.

Action Steps:

- Identify skills required to meet changes that have occurred and are anticipated in the financial services industries.
- Revise core training programs to include new technologies and products, such as digital assets and AI.
- Conduct a risk assessment to determine the level of risk facing the Department regarding the potential loss of knowledge and the areas of knowledge gaps.
- Continue to refine and improve succession planning.
- Develop a knowledge transfer strategy that includes documenting processes, steps, dates, relationships, players, contacts, forms, and files.
- Institute checklists, flowcharts, reference guides, and job pairing to provide easy to access resources.

Gap: Attracting and retaining talented employees.

Goal: Become an employer of choice.

Rationale: There is a competitive job market for qualified individuals with the skills required to perform the duties of an examiner and to maintain the business operations of the Department.

Action Steps:

- Continue efforts to maintain examiner salaries comparable to the FDIC salaries.
- Continue partnerships with universities to recruit through job fairs and internship programs.
- Continue and develop the current internship program. Expand program to more universities.
- Continue to offer flexible work schedules and telework options.
- Continue to mitigate travel exposure with alternative work methods and technology.
- Provide training in specialized areas related to the examination process.

SCHEDULE F: Agency Workforce Plan

- Explore new strategies to meet staffing needs. One strategy that has been discussed is to overstaff in critical areas to increase the “bench-strength” of the Department.
- Formalize a program for cross-training by exposing field staff to administrative, research, and other support duties.
- Develop strategies to attract qualified individuals to professional positions (attorneys and accountants) in the Department headquarters office.

Gap: Leadership Development

Goal: Through our annual performance appraisal process, identify potential employees for succession to leadership positions.

Rationale: 85% of current leadership are eligible to retire within the next five years.

Action Steps:

- Identify the knowledge, skills, and abilities of current successful leadership positions.
- Identify high potential staff that possess or could more readily acquire the necessary abilities and knowledge.
- Continue to provide training, experience, or job shadowing on assignments.
- Provide opportunities for mid-level and senior examiners to rotate into headquarters positions or functions for exposure to the supervisory duties not obtained in the field.
- Provide opportunities for mid-level managers to attend management training programs.