

## Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWT), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWD)

Answer No

b. Cluster GS-11 to SES (PWD)

Answer No

Please note that the CFPB does not fall under the GS grade clusters and therefore uses the following EEOC approved salary clusters. A copy of the CFPB pay bands and GS grade level equivalents were provided to the EEOC. (See <https://www.consumerfinance.gov/about-us/careers/pay-scales/>) Using the salary clusters and including data from completed Standard Form (SF)-256, data on 30% or more disabled veterans and data on Schedule A(u) appointments which are allowable under the Section 501 regulations. As of September 30, 2023, less than 10 permanent employees were earning below \$78,592 and 15.6% of employees earning \$78,592 and above were PWD. \* Salary threshold of \$78,592 represents salary for an employee paid at the GS-11 Step 1 level in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA ("Washington DC") locality area as of September 30, 2023. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf>.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWT by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWT)

Answer No

b. Cluster GS-11 to SES (PWT)

Answer No

Please note that the CFPB does not fall under the GS grade clusters and therefore uses the following EEOC approved salary clusters: Using the salary clusters and including data from completed SF-256, data on 30% or more disabled veterans, and data on Schedule A(u) appointments which are allowable under the Section 501 regulations, As of September 30, 2023, less than 10 permanent employees were earning below \$78,592 and 2.7% of employees earning \$78,592 and above were PWT.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES	1512	193	12.76	40	2.65
Grades GS-1 to GS-10	44	9	20.45	2	4.55

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

The Disability and Accessibility Program Section (DAPS) informed all Division leaders about the CFPB's Section 501 Affirmative Action Plan (AAP) and numerical goals, including the 12% and 2% numerical inclusion goals as part of ongoing Diversity, Equity, Inclusion and Accessibility (DEIA) strategic planning discussions. DAPS also encouraged Division leaders to socialize the goals within their divisions (including to hiring managers). The numerical goals were also communicated to all employees through internal communication channels including the CFPB's Weekly Digest and Manager Minute digital publications.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

- Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer No

During FY 2023, the RA Coordinator separated, and the vacant position is expected to be filled during FY 2024.

- Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	3	0	0	Department of Treasury's Bureau of the Fiscal Service (BFS), CFPB's third-party service provider, CFPBINQUIRIES@fiscal.t
Processing reasonable accommodation requests from applicants and employees	1	0	0	CFPB_REASONABLEAC
Answering questions from the public about hiring authorities that take disability into account	3	0	0	Department of Treasury's Bureau of the Fiscal Service (BFS), CFPB's third-party service provider, CFPBINQUIRIES@fiscal.t
Architectural Barriers Act Compliance	0	0	1	Jane Engvall Administrative Operations CFPBFacilities@cfpb.gov
Section 508 Compliance	1	0	0	CFPB_Accessibility@cfpb.
Special Emphasis Program for PWD and PWTD	1	0	0	CFPB_DisabilityProgram@

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

During FY 2023, the CFPB pivoted to a new hybrid workforce in accordance with the CFPB Next collective bargaining agreement article. CFPB staff, under the new hybrid workforce, attended virtual trainings offered by organizations external to the CFPB. Disability program staff offered a pilot training for Mental Health First Aid training in order expand our staff’s understanding of invisible disabilities and to further equip staff with the proper tools and knowledge to assist CFPB employees that may experience a mental health crisis. This training will be offered CFPB-wide during FY 2024. The CFPB also provided annual internal trainings. Disability program staff received the following targeted training: • Employer Assistance and Resource Network (EARN) on Disability Inclusion sessions via webinars offered throughout the year on multiple disability services and program topics. • Federal Dispute Resolution (FDR) training, which included various sessions on reasonable accommodation-related issues and case law updates along with panel discussions. • EEOC’s EXCEL Training Conference. Other training and events staff attended included: EEOC/Federal Exchange on Employment and Disability (FEED) training, Small Agency 501 Affirmative Action Regulation Working Group sessions, and the DVAAP Forum and Overview.

## B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

The CFPB continues to provide the sufficient budget and ensures sufficient resources are available for the entire Disability and Accessibility Program Section (DAPS). The CFPB’s current budget supports the CFPB’s reasonable accommodations program, accessibility, and 508 efforts.

## Section III: Program Deficiencies In The Disability Program

## Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

## A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

The CFPB continues to recruit PWD and PWTD using digital and social media outreach such as eQuest, LinkedIn and the CFPB’s career page at [www.consumerfinance.gov/jobs](http://www.consumerfinance.gov/jobs). The CFPB encourages individuals with disabilities to apply under the Schedule A(u) Hiring Authority to open positions, which are posted on USAJobs. The CFPB’s OHC Talent Acquisition and Staffing team and the DAPS Section Chief also encourage hiring managers to utilize programs such as Workplace Recruitment Program (WRP) to identify, interview, and hire PWD and PWTD non-competitively without vacancy announcements when possible. A Selective Placement Program Coordinator in OHC assists with Schedule A(u) hiring efforts, including to monitor conversions.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

The CFPB encourages individuals with disabilities (e.g., Schedule A(u), 30% or more disabled veterans, etc.) to apply for positions that are posted via vacancy announcements on USAJobs. Individuals with disabilities who meet minimum qualifications and provide the appropriate documentation as prescribed by 5 CFR 213.3102(u) are referred to the hiring manager for consideration. The eligibility and qualification determinations are made by the CFPB's third-party service provider, Department of Treasury's Bureau of the Fiscal Service (BFS). CFPB continues to leverage the hiring of PWD and PWTI through resources such as the WRP and existing registries housed on [www.max.gov](http://www.max.gov).

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The CFPB encourages hiring managers to use non-competitive hiring authorities. Per the CFPB's Schedule A(u) Directive, if an applicant with eligibility under a hiring authority that takes disability into account is selected, OHC-Talent Acquisition and Staffing team provides guidance to the hiring manager on how the individual may be appointed. If the candidates with disabilities meet minimum qualifications and provide the appropriate eligibility documentation and are sourced through vacancy announcements on USAJobs, they are referred to the hiring manager for consideration. This determination is made by the CFPB's third-party service provider, Department of Treasury's Bureau of the Fiscal Service (BFS). If a hiring manager identifies a position that they would like to fill outside of the vacancy announcement procedures, the CFPB's OHC Selective Placement Program Coordinator in partnership with the Staffing Specialists in OHC work with the hiring manager to identify eligible candidates from pre-approved disability resume databases, such as the WRP database and existing registries housed on [www.max.gov](http://www.max.gov), as outlined in the CFPB's Schedule A(u) Directive. When a vacancy announcement is not used, the eligibility is either determined by the third-party database, verified by the OHC Selective Placement Program Coordinator and OHC Talent Acquisition and Staffing team or by review of the medical documentation submitted by the applicant. The hiring managers for these positions are provided with an overview of the hiring authorities that take disability into account prior to and throughout the hiring process, and they are provided with resumes of eligible disabled candidates for consideration if available. All eligibility documentation is collected by OHC for verification. No medical documentation is sent to or shared with the hiring manager.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

The OHC Talent Management team delivers a full 3-day CFPB Supervisory Development Seminar (SDS), which is a one-time training required of all CFPB supervisors/managers (at all levels) to take within their first year of supervisory duties at CFPB. This training covers federal hiring authorities including a section on Schedule A hiring, and meets the requirements of 5 CFR, Part 412.202-Systematic training and development of supervisors, managers, and executives. Following the completion of the one-time CFPB SDS, each CFPB supervisor/manager is to complete the 1-day CFPB SDS Refresher training course, once every three years, to keep refreshed on these topics critical to all Federal supervisors/managers. The Office of Civil Rights (OCR) and DAPS also circulate information to managers about this hiring flexibility through the digital (email) bi-weekly Manager Minute publication and on the CFPB's intranet site. Written materials (such as the EEOC brochures on using the Schedule A(u) hiring authority) are also made readily available on display stands throughout CFPB facilities. The DAPS Section Chief and Staffing Specialists assigned to each office also assist managers with all staffing related inquiries, to include Schedule A(u) and other hiring authorities that take disability into account. The DAPS Section Chief also provides Schedule A(u) and other disability related hiring authority overviews annually during regional, leadership, and individual management meetings.

## B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTI, in securing and maintaining employment.

The DAPS Section Chief, along with other CFPB stakeholders in OHC and the Office of Minority and Women Inclusion (OMWI), continues to maintain contact and work with organizations/programs that assist PWD and PWTI, such as the Job Accommodation

Network (JAN), Employer Assistance and Resource Network on Disability Inclusion (EARN), Workforce Recruitment Program (WRP), Veterans, and Wounded Warrior programs to promote employment opportunities. OHC, OMWI (including DAPS), and OCR as appropriate, coordinate annually on outreach and recruitment strategies and priorities. Along with the continued use of the Schedule A(u) hiring authority, the CFPB continues to explore how to best leverage WRP through the Department of Labor and existing registries housed on [www.max.gov](http://www.max.gov).

## C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

- Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

a. New Hires for Permanent Workforce (PWD)                          Answer No

b. New Hires for Permanent Workforce (PWTD)                          Answer No

N/A

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	4105	4.29	1.24	1.85	0.61
% of Qualified Applicants	2046	4.64	0.73	2.20	0.44
% of New Hires	36	2.78	0.00	0.00	0.00

- Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for MCO (PWD)                          Answer Yes

b. New Hires for MCO (PWTD)                          Answer Yes

The CFPB has four mission critical occupations (MCOs): 0110/Economists, 0301/Miscellaneous Administration & Program, 0570/Examiners, 0905/General Attorneys. In FY 2023, there are triggers for PWD and PWTD for the permanent new hires when compared to the qualified applicant pool for the 0110 and 0301 series and triggers for PWTD for the permanent new hires when compared to the qualified applicant pool for the 0905 series. There were qualified PWD and/or PWTD in these series, but none of the new hires selected for these series self-identified as PWD and/or PWTD. There were no selections made in the 0570 series.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		New Hires (%)		New Hires (%)	
Numerical Goal	--	12%		2%	
0110 ECONOMIST	6	0.00		0.00	
0301 MISCELLANEOUS ADMINISTRATION AND PROGRAM	3	0.00		0.00	
0570 FINANCIAL INSTITUTION EXAMINING	0	0.00		0.00	
0905 GENERAL ATTORNEY	14	7.14		0.00	

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTM among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Qualified Applicants for MCO (PWD)                          Answer Yes  
b. Qualified Applicants for MCO (PWTM)                          Answer No

Triggers exist for the 0301 series because the qualified internal applicants for PWD (9.2%) is lower than the relevant applicant pool for PWD (12.2%). Triggers exist for the 0570 series because the qualified internal applicants for PWD (8.8%) is lower than the relevant applicant pool for PWD (16.1%).

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTM among employees promoted to any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Promotions for MCO (PWD)                          Answer Yes  
b. Promotions for MCO (PWTM)                          Answer Yes

Trigger for the 0570 series because the selections of PWD (5.3%) is lower than the qualified applicant pool for PWD (8.8%).  
Trigger exists for PWTM selections (0.0%) is lower than the qualified applicant pool for PWTM (3.8%).

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTM, have sufficient opportunities for advancement.

The OHC will continue to post all internal advancement opportunities, i.e., details, temporary promotions and reassignments on the CFPB’s internal website and ensure that these opportunities are listed on the Daily Announcements feed on the main page of the CFPB’s intranet so that all employees are informed. Additionally, the CFPB’s DAPS Section Chief will continue to encourage PWD and PWTM to apply to opportunities, and promote reassignment, promotion, detail, and temporary promotion opportunities that become available to ensure that PWD and PWTM are aware of them. The DAPS Section Chief will also partner with OHC and OMWI to promote internal advancement opportunities. Other advancement opportunities continue to include:

- Promoting the use of training courses available through the CFPB’s Learning Management System in efforts to improve professional development.
- Promoting the development of personal learning and development goals and helping employees to develop and implement Individual Development Plans (IDPs).
- Encouraging all employees to utilize the CFPB’s Career Development Framework and other internal resources to enhance the growth and development of all employees. OCR and DAPS will continue co-leading barrier analysis efforts to assist with providing or improving internal advancement opportunities for PWD and PWTM. The CFPB has plans outlined in Section VII of this report.

### B. CAREER DEVELOPMENT OPPORTUNITIES

1. Please describe the career development opportunities that the agency provides to its employees.

The CFPB continues to offer career development tools and resources that assist all employees, to include PWD and PWTM, with skill development. The CFPB’s Career Development Framework, Career Planning tools, and other internal resources for

professional growth and development continue to be available to all CFPB employees, including PWD and PWTD, interested in promoting their career and development goals. Examples include: Individual Development Planning and Career Development Workshops, self-directed career planning and development tools, resources, and activities, voluntary consultations on Individual Development Plans and Career Planning, continuation of the CFPB Team Leader training program, the matrix of courses for Aspiring Leaders, and continued availability of external training and development opportunities. Additionally, the CFPB advertised internal detail opportunities to CFPB employees using a Centralized Detail Posting Process. In FY 2023, CFPB managers leveraged internal details, temporary promotions, and reassessments to develop staff and augment work throughout the fiscal year. Internal career opportunities are posted on the CFPB's intranet site. External vacancies are posted on the CFPB's website, USAJobs, as well as on the Daily Announcements feed on the CFPB's intranet, which is widely seen by all CFPB employees. Employees are also encouraged to apply in the competitive hiring process for any position for which they feel they may qualify. In FY 2023, CFPB provided external applicants opportunities through virtual competitive student internship and fellowship programs (such as the Honors Attorney Program, Research Assistant Program, and the Director's Financial Analysts Program). The CFPB also used competitive details to provide general growth opportunities for existing employees. CFPB managers also participate in mandatory management training, which includes training specifically on developing and engaging employees for their growth and development. All CFPB executives, managers and supervisors are eligible to participate in the CFPB's leadership coaching programs. The First Line Supervisor Cohort Coaching offering which was piloted in FY 2022 was formally launched during FY 2023. Given staffing changes and a focus on iterating and further improving the CFPB Mentoring Program, it did not operate in FY 2023. It relaunched in early FY 2024 with a call for Mentors and Protégés. Mentors are required to complete a thirty-seven-minute online "Cultivating Mentor Relationships" training and are asked to remain mentors for one year. Mentors are added to a database that Protégés can search and identify a mentor that aligns with their professional goals and needs. The Office of Minority and Women Inclusion (OMWI) will schedule an intake meeting with the Mentor and Protégé as well as host quarterly events. The first event is Speed Mentoring, which is scheduled for January 2024.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWT	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	N/A					
Coaching Programs	N/A					
Internship Programs	495	20	5.9	10.0	3.4	5.0
Fellowship Programs	404	19	4.0	10.5	2.2	10.5
Other Career Development Programs	N/A					
Detail Programs	N/A					
Training Programs	N/A					

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD)

Answer Yes

- b. Selections (PWD)

**Answer No**

In FY 2023, a trigger exists for applicants in the Internship Programs (5.9% PWD self-identified in the application pool versus the benchmark of 12.0%). A trigger exists for applicants in the Fellowship Program (4.0% PWD self-identified in the applicant pool versus the benchmark of 12.0%). Selections in the Fellowship Programs data set included Director's Financial Analysts and Research Assistants.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”,

describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                      |              |
|----------------------|--------------|
| a. Applicants (PWTD) | Answer    No |
| b. Selections (PWTD) | Answer    No |

N/A
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## C. AWARDS

- Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- |   |               |
|---|---------------|
| a. Awards, Bonuses, & Incentives (PWD)  | Answer    Yes |
| b. Awards, Bonuses, & Incentives (PWTD) | Answer    Yes |

For PWD and PTWD, the EEOC instructs agencies to use the Inclusion Rate (IR), which compares the number of people within the target population (e.g., PWTD or PWD) to the number of people within the benchmark population (e.g., Persons without a Targeted Disability (PWOTD) or Persons without a Disability (PWOD)). This is used because there is no Civilian Labor Force (CLF) category for PWD/PWTD. In other words, the EEOC instructs us to compare (1) the ratio of the number of PWD (or PWTD) who got a particular type of award vs. the total number of PWD (or PWTD) eligible for that award with (2) the ratio of the number of PWOD (or PWOTD) who got a particular type of award vs. the total number of PWOD (or PWOTD) eligible for that award. We compare the IR for the Target Population with the IR for the Benchmark Population. The below analysis of the Bureau’s award program is limited to spot awards, superior achievement awards, team achievement awards and the Director’s Mission Achievement awards and is separate from the Bureau’s compensation program where employees receive lump sum payments and merit increases based on their performance rating. All employees who receive an Accomplished Performer rating (on the pass/fail system) receive their lump sum and merit increases. (Special calculations/payouts apply to employees whose salary exceeds an applicable cap.) The below analysis of the CFPB’s award program is limited to spot awards, superior achievement awards, team achievement awards and the Director’s Mission Achievement awards and is separate from the CFPB’s compensation program where employees receive lump sum payments and merit increases based on their performance rating. All employees who receive an Accomplished Performer rating (on the pass/fail system) receive their lump sum and merit increases. (Special calculations/payouts apply to employees whose salary exceeds an applicable cap.) For Awards, when the IR percentage for the target is lower than IR percentage for the benchmark, there is a trigger. The triggers identified below are being analyzed through the CFPB’s ongoing barrier analysis work.

Total Awards from \$500 and under given: 1,153 PWD Target (\$500 and under): 145 PWD Benchmark: 202 PWOD Target (\$500 and under): 1,153-145=1,008 PWOD Benchmark: 1,556-202=1,354 PWD IR 71.8% < PWOD 74.4%. This is a trigger. Total Awards from \$501-\$999 given: 256 PWD Target (\$501-\$999): 31 PWD Benchmark: 202 PWOD Target (\$501-\$999): 256-31=225 PWOD Benchmark: 1,556-202=1,354 PWD IR 15.3% < PWOD 16.6%. This is a trigger. Total Awards from \$1000-\$1999 given: 229 PWD Target (\$1000-\$1999): 28 PWD Benchmark: 202 PWOD Target (\$1000-\$1999): 229-28=201 PWOD Benchmark: 1,556-202=1,354 PWD IR 13.9% < PWOD 14.8%. This is a trigger. Total Awards from \$1000-\$1999 given: 229 PWTD Target (\$1000-\$1999): 5 PWTD Benchmark: 42 PWOTD Target (\$1000-\$1999): 229-5=224 PWOTD Benchmark: 1,556-42=1,514 PWTD IR 11.9% < PWOTD 14.8%. This is a trigger. ----- Total Awards from 1-10 hours given: 152 PWD Target (1-10 hours): 17 PWD Benchmark: 202 PWOD Target (1-10 hours): 152-17=135 PWOD Benchmark: 1,556-202=1,354 PWD IR 8.4% < PWOD 10.0%. This is a trigger. Total Awards from 21-30 hours given: 21 PWTD Target (1-10 hours): 0 PWTD Benchmark: 42 PWOTD Target (1-10 hours): 21-0=21 PWOTD Benchmark: 1,556-42=1,514 PWTD IR 0.0% < PWOTD 1.4%. This is a trigger. Total Awards from 31-40 hours given: 19 PWD Target (31-40 hours): 1 PWD Benchmark: 202 PWOD Target (31-40 hours): 19-1=18 PWOD Benchmark: 1,556-202=1,354 PWD IR 0.5% < PWOD 1.3%. This is a trigger. Total Awards from 31-40 hours given: 19 PWTD Target (31-40 hours): 0 PWTD Benchmark: 19 PWOTD Target (31-40 hours): 19-0=19 PWOTD Benchmark: 1,556-42=1,514 PWTD IR 0.0% < PWOTD 1.3%. This is a trigger. There were no awards in the groupings of \$3000-\$3999, \$4000-\$4999 or \$5000 or more. There were no time off awards in the 41 hours or more category.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	152	8.42	9.86	11.90	7.50

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 Hours: Total Hours	1216	67.33	78.90	95.24	60.00
Time-Off Awards 1 - 10 Hours: Average Hours	8	3.96	0.65	19.05	0.00
Time-Off Awards 11 - 20 hours: Awards Given	95	8.42	5.74	7.14	8.75
Time-Off Awards 11 - 20 Hours: Total Hours	1520	134.65	91.84	114.29	140.00
Time-Off Awards 11 - 20 Hours: Average Hours	16	7.92	1.29	38.10	0.00
Time-Off Awards 21 - 30 hours: Awards Given	21	0.99	1.46	0.00	1.25
Time-Off Awards 21 - 30 Hours: Total Hours	504	23.76	34.92	0.00	30.00
Time-Off Awards 21 - 30 Hours: Average Hours	24	11.88	1.94	0.00	15.00
Time-Off Awards 31 - 40 hours: Awards Given	19	0.50	1.29	0.00	0.63
Time-Off Awards 31 - 40 Hours: Total Hours	680	15.84	45.92	0.00	20.00
Time-Off Awards 31 - 40 Hours: Average Hours	35.79	15.84	2.87	0.00	20.00
Time-Off Awards 41 or more Hours: Awards Given	100	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	256	15.35	16.81	23.81	13.13
Cash Awards: \$501 - \$999: Total Amount	189653	11534.65	12443.57	17857.14	9875.00
Cash Awards: \$501 - \$999: Average Amount	740.83	372.08	59.82	1785.71	1.01
Cash Awards: \$1000 - \$1999: Awards Given	229	13.86	15.04	11.90	14.38
Cash Awards: \$1000 - \$1999: Total Amount	282531	16444.06	18679.39	14166.67	17041.88
Cash Awards: \$1000 - \$1999: Average Amount	1233.76	587.29	100.43	2833.33	-2.30
Cash Awards: \$2000 - \$2999: Awards Given	28	1.49	1.86	2.38	1.25
Cash Awards: \$2000 - \$2999: Total Amount	61000	2970.30	4122.88	4761.90	2500.00
Cash Awards: \$2000 - \$2999: Average Amount	2178.57	990.10	179.26	4761.90	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

a. Pay Increases (PWD)

Answer No

b. Pay Increases (PWTD)

Answer No

N/A. Due to the CFPB pay system which does not contain “steps” there are no “step increases.”

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

N/A

## D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Answer Yes
ii. Internal Selections (PWD)	Answer Yes
d. Grade GS-13	
i. Qualified Internal Applicants (PWD)	Answer Yes
ii. Internal Selections (PWD)	Answer No

CN-81/82/90 (SES equivalent): There is a trigger for qualified internal applicants and for internal selections. The qualified internal applicants who self-identified as PWD (4.2%) are lower than the relevant applicant pool who are PWD (11.0%). The internal selections who self-identified as PWD (0.0%) are lower than the qualified applicant pool who are PWD (4.2%). CN-60/61 (GS-14 equivalent): There is a trigger for qualified internal applicants and for internal selections. The qualified internal applicants who self-identified as PWD (8.4%) are lower than the relevant applicant pool who are PWD (13.6%). The internal selections who self-identified as PWD (3.3%) are lower than the qualified applicant pool who are PWD (8.4%). CN-53 (GS-13 equivalent): There is a trigger for qualified internal applicants. The qualified internal applicants who self-identified as PWD (11.1%) are lower than the relevant applicant pool who are PWD (17.9%).

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES	
i. Qualified Internal Applicants (PWTD)	Answer No
ii. Internal Selections (PWTD)	Answer Yes
b. Grade GS-15	
i. Qualified Internal Applicants (PWTD)	Answer No
ii. Internal Selections (PWTD)	Answer No
c. Grade GS-14	
i. Qualified Internal Applicants (PWTD)	Answer No
ii. Internal Selections (PWTD)	Answer Yes
d. Grade GS-13	
i. Qualified Internal Applicants (PWTD)	Answer No
ii. Internal Selections (PWTD)	Answer Yes

CN-81/82/90 (SES equivalent): There is a trigger for internal selections. The internal selections who self-identified as PWTD (0.0%) are lower than the qualified applicant pool who are PWTD (4.2%). CN-60/61 (GS-14 equivalent): There is a trigger for internal selections. The internal selections who self-identified as PWTD (0.0%) are lower than the qualified applicant pool who are PWTD (2.7%). CN-53 (GS-13 equivalent): There is a trigger for internal selections. The internal selections who self-identified as PWTD (0.0%) are lower than the qualified applicant pool who are PWTD (5.7%).

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)	Answer	No
b. New Hires to GS-15 (PWD)	Answer	No
c. New Hires to GS-14 (PWD)	Answer	No
d. New Hires to GS-13 (PWD)	Answer	Yes

CN-53 (GS-13 equivalent): 0.0% of new hires were PWD compared with 5.5% qualified applicants who self-identified as PWD.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTD)	Answer	No
b. New Hires to GS-15 (PWTD)	Answer	Yes
c. New Hires to GS-14 (PWTD)	Answer	Yes
d. New Hires to GS-13 (PWTD)	Answer	Yes

CN-71 (GS-15 equivalent): 0.0% of new hires were PWTD compared with 2.8% qualified applicants who self-identified as PWTD.

CN-60 (GS-14 equivalent): 0.0% of new hires were PWTD compared with 2.4% qualified applicants who self-identified as PWTD.

CN-53 (GS-13 equivalent): 0.0% of new hires were PWTD compared with 3.1% qualified applicants who self-identified as PWTD.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
b. Managers		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	No
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No

Executives: There is a trigger for qualified internal applicants and for internal selections. The qualified internal applicants who self-identified as PWD (4.2%) are lower than the relevant applicant pool who are PWD (11.0%). The internal selections who self-identified as PWD (0.0%) are lower than the qualified applicant pool who are PWD (4.2%). Managers: There is a trigger for qualified internal applicants. The qualified internal applicants who self-identified as PWD (10.2%) are lower than the relevant applicant pool who self-identify who are PWD (11.7%).

Does your agency have a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTB) | Answer | No  |
| ii. Internal Selections (PWTB)          | Answer | Yes |

b. Managers

- |   |        |    |
|---|--------|----|
| i. Qualified Internal Applicants (PWTB) | Answer | No |
| ii. Internal Selections (PWTB)          | Answer | No |

c. Supervisors

- |   |        |    |
|---|--------|----|
| i. Qualified Internal Applicants (PWTB) | Answer | No |
| ii. Internal Selections (PWTB)          | Answer | No |

Executives: There is a trigger for internal selections. The internal selections who self-identified as PWTB (0.0%) are lower than the qualified applicant pool who are PWTB (4.2%).

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                    |        |     |
|------------------------------------|--------|-----|
| a. New Hires for Executives (PWD)  | Answer | No  |
| b. New Hires for Managers (PWD)    | Answer | Yes |
| c. New Hires for Supervisors (PWD) | Answer | No  |

Managers: There is a trigger for new hires. The new hires who self-identified as PWD (0.0%) are lower than the qualified external applicants who self-identified as PWD (9.5%).

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                     |        |     |
|-------------------------------------|--------|-----|
| a. New Hires for Executives (PWTB)  | Answer | No  |
| b. New Hires for Managers (PWTB)    | Answer | Yes |
| c. New Hires for Supervisors (PWTB) | Answer | No  |

Managers: There is a trigger for new hires. The new hires who self-identified as PWTB (0.0%) are lower than the qualified external applicants who self-identified as PWTB (3.2%).

## Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable

accommodation program and workplace assistance services.

## A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

- In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer Yes

N/A

- Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD)

Answer No

b. Involuntary Separations (PWD)

Answer No

N/A

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	1	0.00	0.07
Permanent Workforce: Resignation	26	0.93	1.64
Permanent Workforce: Retirement	18	0.47	1.16
Permanent Workforce: Other Separations	26	0.93	1.64
Permanent Workforce: Total Separations	71	2.34	4.52

- Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWTD)

Answer Yes

b. Involuntary Separations (PWTD)

Answer No

Using the inclusion rate, triggers exist for PWTD (7.1%) who voluntarily separated from the CFPB at a higher rate than persons without targeted disabilities (4.4%).

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	1	0.00	0.06
Permanent Workforce: Resignation	26	2.22	1.53
Permanent Workforce: Retirement	18	2.22	1.04
Permanent Workforce: Other Separations	26	2.22	1.53
Permanent Workforce: Total Separations	71	6.67	4.17

- If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

From the separations data for employees on permanent positions, three individuals with targeted disabilities separated. There were

no commonalities amongst the three individuals as they separated through three different means (e.g., voluntary retirement, transfer and resignation) and were from three different divisions, in three different occupational series and three different grade levels. For FY 2023 exit surveys, 60% of employees invited to take the survey completed it and 13% of those who completed a survey self-identified as a person with a disability. All six (100%) of the individuals who self-identified as having a disability indicated that CFPB did not try to keep them from leaving (compared with 79.5% for individuals without a disability). In the exit survey comments, it was suggested to: "Make it a cultural norm to speak clearly, loudly, and at a reasonable pace in all meetings and presentations. Include sufficient visual content. Hire competent transcriptionists who are familiar with CFPB jargon to transcribe narratives." In early FY 2024, CFPB's newest Employee Resource Group (ERG), called Disability Resources for Employees & Accessibility Meetup (DREAM) was established for employees with disabilities, their caretakers, and allies. DREAM aims to advance the professional development of its members and is aligned with the organizational initiatives of CFPB by promoting accessibility and inclusion in the workplace.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b)), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

<https://www.consumerfinance.gov/accessibility/> <https://www.consumerfinance.gov/accessibility/file-accessibility-complaint/>

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://www.consumerfinance.gov/accessibility/> <https://www.consumerfinance.gov/accessibility/file-accessibility-complaint/>

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

In FY 2023, the CFPB's DAPS Section Chief led working group efforts to partner with CFPB Administrative Operations, Facilities, and Technology & Innovation (T&I) offices to ensure that accessibility to CFPB facilities and technology are considered in Bureau services and the procurement of supplies and services. Contact information for accessibility inquiries remain on the CFPB's external website. With the increase in virtual meetings due to our shift in becoming a hybrid workforce, the CFPB maintained its closed captioning budget within T&I to ensure that CFPB-wide meetings and events have appropriate funding. Due to CFPB's growing 508 demands, in FY 2023 DAPS expanded the 508 program by establishing a 508 contract support staff of three contractors to support the CFPB's one Program Manager. In the process to ensure that this contractual effort was fully funded, DAPS allocated \$608,000 to the new 508 accessibility contract. As we work to elevate the "A" in accessibility; all CFPB documents and systems must go through a clearance process to ensure 508 compliance. During FY 2023, the DAPS Section Chief and the 508 Program Manager implemented a 508 program workplan that outlined metrics and milestones to create CFPB-wide 508 program policies and procedures that would improve the accessibility of technology for PWD and PWTD. The 508 Program also completed drafting of a robust 508 policy that will support the implementation of the 508 program workplan once finalized. Additionally, at the end of FY 2023, DAPS contractors completed an annual 508 compliance assessment. Beginning in FY 2024, action will be taken on prioritized action items to further iterate and improve the 508 compliance program, including eliminating any deficiencies or gaps identified. During FY 2023, it was determined that a mandatory training on 508 compliance would be offered through the learning management system and required for all employees beginning in FY 2024. The budget for RA ergonomics increased to ensure that accessibility and ergonomic needs were effectively met, due to an influx of ergonomic requests from employees that are working from home. To ensure that users of assistive technology devices were provided with the necessary training, additional funding was also appropriated for assistive technology. These trainings were critical to assist users with successfully utilizing the prescribed software, thus maximizing the effectiveness of their accommodations. While the CFPB transitioned to a hybrid workforce for FY 2023, all CFPB buildings and facilities remained compliant under the Architecture

Barriers Act, maintaining equal access to buildings for PWD and PWTD. The CFPB has a Diversity, Equity, Inclusion and Accessibility (DEIA) Strategic Plan for FY 2022-2026. It includes goals and actions related to facility accessibility improvements. In early FY 2024, DAPS partnered with OCR to present Bureau-wide on disabilities and unconscious bias, which included a focus on 508 accessibility requirements.

## C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

During FY 2023, the Reasonable Accommodation program processed 85 reasonable accommodation cases, with an average processing time of 8 calendar days (measured beginning with the date the relevant request was received until the time a decision on the accommodation was communicated). CFPB's current reasonable accommodation SOP generally requires accommodations to be provided in no more than 30 days, absent extenuating circumstances (which are strictly defined in the SOP). Where extenuating circumstances exist, the CFPB will investigate whether there are temporary measures that can be taken to assist the requestor and provide temporary measures where feasible.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The CFPB remains committed to providing reasonable accommodations services to all employees and applicants for CFPB employment. Reasonable accommodations are centrally funded with a sufficient dedicated budget and employee resources. Reasonable Accommodations and Personal Assistance Services revised policies and procedures, approved by the EEOC on October 6, 2021, ensure that applicants and employees know their rights under the Rehabilitation Act to receive a reasonable accommodation for disability-related limitations if needed to apply for a Bureau job, perform the essential functions of a job, or enjoy equal benefits and privileges of employment at the CFPB. The CFPB's policy also explains management's responsibilities when a supervisor or manager is put on notice that an employee requires a reasonable accommodation. The accompanying SOP lays out the interactive process used when an employee requests a reasonable accommodation for a disability. The Reasonable Accommodations and Personal Assistance Services policy and associated procedures are being reviewed and revised and should be finalized during FY 2024. The Reasonable Accommodation/PAS program also receives legal support from the Legal Division's Office of General Law and Ethics to ensure that the Reasonable Accommodation/PAS program complies with all legal obligations; support from the CFPB's Section 508 Program Manager on technology issues; technical assistance from OCR staff as needed and appropriate; support from the Department of Treasury's Bureau of the Fiscal Service (BFS) for applicants seeking reasonable accommodations; and contractor medical professional advice when needed. In FY 2023, the CFPB disseminated and trained appropriate staff on policy and procedures (and forms) and posted them on [www.consumerfinance.gov](http://www.consumerfinance.gov), as required under the affirmative action regulations. The most updated, finalized policy and procedures are available at <https://www.consumerfinance.gov/office-civil-rights/reasonable-accommodation-persons-disabilities/>. The same policy and procedures are available on the Wiki (CFPB's intranet) for all employees. During FY 2023, the CFPB also conducted general training on the Rehabilitation Act and reasonable accommodations during regional, division, and office meetings to ensure that managers and employees understand the Rehabilitation Act and their role in the reasonable accommodation process and to learn how to respond appropriately when an individual requests a reasonable accommodation. The CFPB continues to utilize the Entellitrak system, the CFPB's electronic database for reasonable accommodations, to track reasonable accommodations data. Some highlights from the RA Entellitrak reporting for FY 2023 are as follows: Of the 85 RA cases processed in FY 2023, the CFPB had 84 cases in which accommodations were granted (including 4 cases in which the requestor was provided alternate accommodations). One case was closed when the requestor failed to engage in the interactive process. In providing ergonomic equipment and assistive technology accommodations in FY 2023, the CFPB spent approximately \$37,513.03 from its centralized reasonable accommodations budget, averaging \$1,875.65 per case for each request that required an expenditure. The CFPB also spent \$42,149.47 for American Sign Language Interpretation accommodations and accessibility services, and \$10,218.35 for Sprint closed captioning accommodations and services in FY 2023.

## D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The CFPB's Reasonable Accommodations and Personal Assistance Services revised policies and procedures were approved by the EEOC on October 6, 2021 and include the PAS requirement. The PAS SOP provides that the process for requesting PAS, the CFPB's process for determining whether such services are required, and the CFPB's determination to deny PAS requests when it would pose an undue hardship, are the same processes as for reasonable accommodation. The CFPB had 11 requests for PAS in FY 2023 and spent \$3,845.86. The CFPB has a contract in place in the event that an employee requests PAS services. The CFPB reviews and analyzes the effectiveness of the revised policy and SOP as appropriate.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

N/A According to the EEOC's benchmark, 23.12% of all formal EEO complaints filed government-wide included an allegation of harassment based on either a mental or physical disability. According to CFPB Form 462 data for FY 2023, 2 out of the 15 formal complaints filed with CFPB's Office of Civil Rights under 29 C.F.R. Part 1614 (not including complaints filed alleging violations of Executive Order 11478) alleged disability-based harassment. Thus, the CFPB percentage of such complaints is 13.33% (2/15) -- below the government-wide benchmark of 23.12%

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

N/A According to the EEOC's benchmark, 13.79% of all formal EEO complaints filed government-wide included an allegation of failure to accommodate based on either a mental or physical disability. According to CFPB Form 462 data for FY 2023, 3 out of the 15 formal complaints filed with CFPB's Office of Civil Rights under 29 C.F.R. Part 1614 (not including complaints filed alleging violations of Executive Order 11478) alleged failure to accommodate either a mental or physical disability. Thus, the CFPB percentage of such complaints is 20.00% (3/15) – above the government-wide benchmark of 13.79%.

## Section VIII: Identification and Removal of Barriers

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer Yes

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

<b>Source of the Trigger:</b>	Other				
<b>Specific Workforce Data Table:</b>	Multiple Inputs				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	<ul style="list-style-type: none"> <li>From FY 2017-FY 2019, participation rate for PWD in supervisory positions was lower than the target of 12%; this was true for mid-level (CN-60) and senior level (CN-71 and above) supervisors.</li> <li>The relevant applicant pool for promotions for PWD for three mission critical jobs (0110: Economist, 0301: Misc. Admin and Program, 0905: General Attorney) did not meet the target of 12%.</li> <li>When looking at Internal Selection for Senior Level CN Positions by Disability, Qualified Applicants are not representative of the Relevant Applicant Pool for the Examiner position.</li> <li>Meaning, of those PWD in the position below these senior level positions, very little (if any) are qualified for promotion.</li> <li>PWD indicated a lower agreement (mean = 2.6) than those without disabilities (2.85) to the question, "How satisfied are you with your opportunity to get a better job in your organization?" (2019 AES)</li> <li>Focus groups and interviews with SMEs noted a lack of career mobility theme given position structure, lack of bridge positions and the inability to gain the necessary experience to be competitive when applying.</li> <li>Nearly half (47%) of CFPB participants with disabilities agreed that PWD face unique challenges regarding advancement opportunities. The response rate to this question from PWD was found to be meaningfully different from the response rate of those without disabilities (24% agreement). (July 2020 survey)</li> <li>Only 20% of participants with disabilities believe the skills and abilities of persons with disabilities are fully utilized. (July 2020 survey)</li> <li>Only 33% of participants with disabilities believe CFPB's process for determining who is selected to receive development opportunities is fair. Also, these responses were meaningfully different from the response rate of those without disabilities, which was 45%. (July 2020 survey)</li> <li>Overall satisfaction from PWD fell below 45% for career development programs, awards and recognition and performance management. (July 2020 survey)</li> </ul>				
<b>STATEMENT OF BARRIER GROUPS:</b>	<b>Barrier Group</b> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	Y				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	Barrier 2		Opaque promotion and detail selection processes		
	Barrier 1		Limited career advancement opportunities for Persons with a Disability		
<b>Objective(s) and Dates for EEO Plan</b>					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
10/01/2021	09/30/2023	Yes			Implement action plan to eliminate barriers identified
<b>Responsible Official(s)</b>					
Title	Name			Standards Address The Plan?	
OMWI Director	Lora McCray			No	
OCR Director	Melissa Brand			No	
Acting OEOF Associate Director	Cassandra McConnell-Tatum			No	
Acting Chief Operating Officer	Jean Chang			No	
Chief Human Capital Officer	Jeffrey Sumberg			No	

<b>Responsible Official(s)</b>				
<b>Title</b>	<b>Name</b>	<b>Standards Address The Plan?</b>		
DAPS Section Chief	Nykea Bolton	No		
<b>Planned Activities Toward Completion of Objective</b>				
<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2022	Launch SEFL Career Development Pilot and encourage PWD/PWTD to voluntarily participate.	Yes		
09/30/2023	Evaluate and expand SEFL Career Development Pilot at the Bureau and encourage PWD/PWTD to voluntarily participate.	Yes		
09/30/2022	Staffing Specialists work with Hiring Managers to career ladder down positions and fill at an entry level or more junior level where possible and appropriate.	Yes		
09/30/2022	Further socialize existing Career Path tools to remind all employees of their availability and content.	Yes		
09/30/2022	Evaluate and update the Schedule A Directive for internal and external applicants.	Yes		
09/30/2022	Hire or identify a Selective Placement Program Coordinator (recruitment of PWD/PWTD, Schedule A, etc.).	Yes		
09/30/2023	Designate a certain number of positions each fiscal year, at various grades, to solicit Schedule A(u) potential candidates first for Hiring Manager consideration.	Yes		
09/30/2022	Permit and encourage hiring managers to explain and be transparent with internal applicants about why they were not selected. Provide guidance to hiring managers about how to have the conversation.	Yes		
09/30/2022	Various communication efforts to encourage creation of a disability Employee Resource Group.	Yes		
<b>Report of Accomplishments</b>				
<b>Fiscal Year</b>	<b>Accomplishment</b>			
2021	N/A			

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

66% of actions items are completed and the remaining items are started, but not yet finalized. Some items are awaiting final sign-off, which is expected during FY 2024.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

For the first barrier, the SEFL Career Development Pilot provided an opportunity to better understand the participants' awareness and use of career development tools, including Individual Development Plans (IDPs) at the beginning and end of the program. This pilot was successful and evaluated for further expansion, which is anticipated for FY 2024. This is expected to help eliminate the barrier of limited career advancement opportunities for PWD. Leadership performance standards were revised and DEIA competencies were expanded for FY 2024, which elevates management accountability. For the second barrier, OHC developed a

Performance Feedback Toolkit with examples and resources. Additionally, a disability ERG was created for employees. The additional materials and the creation of a new ERG, which creates a forum to share and receive information are steps toward eliminating the barrier of opaque promotion and detail selection processes.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

N/A