

## 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

While there is no trigger, please note that the CFPB does not fall under the GS pay clusters and therefore uses the following EEOC approved salary clusters: 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, there are no triggers for PWD. As of September 30, 2022, 22.45% of employees earning less than \$74,950 were PWD and 15.05% of employees earning \$74,950 and above were PWD. \* Salary threshold of \$74,950 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, 2022. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/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

While there are no triggers, please note that the CFPB does not fall under the GS pay 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, there are no triggers for PWT. As of September 30, 2022, 6.12% of employees earning less than \$74,950 were PWT and 2.78% of employees earning \$74,950 and above were PWT.

| Grade Level Cluster(GS or Alternate Pay Planb) | Total | Reportable Disability |       | Targeted Disability |      |
|--|-------|-----------------------|-------|---------------------|------|
|  | #     | #                     | %     | #                   | %    |
| Numerical Goal                                 | --    | 12%                   |       | 2%                  |      |
| Grades GS-1 to GS-10                           | 0     | 0                     | 0.00  | 0                   | 0.00 |
| Grades GS-11 to SES                            | 48    | 6                     | 12.50 | 0                   | 0.00 |

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

~~Affidability and Accessibility Program Selection (DAPS) informed 21 Dids 20 in leaderic about the bureaus a Sp of 50 going 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 Bureau'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 Yes

N/A

- 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<br>(Name, Title, Office Email)  |
|--|-------------------------------------|-----------|-----------------|--|
|  | Full Time                           | Part Time | Collateral Duty |  |
| Processing reasonable accommodation requests from applicants and employees                     | 2                                   | 0         | 0               | —  |
| 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 |
| Special Emphasis Program for PWD and PWTD  | 0                                   | 0         | 1               | CFPB_DisabilityProgram@  |
| 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 |

| Disability Program Task               | # of FTE Staff By Employment Status |           |                 | Responsible Official<br>(Name, Title, Office Email) |
|---------------------------------------|-------------------------------------|-----------|-----------------|---|
|                                       | Full Time                           | Part Time | Collateral Duty |   |
| Architectural Barriers Act Compliance | 0                                   | 0         | 1               | CFPBFacilities@cfpb.gov                             |
| Section 508 Compliance                | 1                                   | 0         | 0               | CFPB_Accessibility@cfpb.gov                         |

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

In FY 2022, Bureau staff, under maximum telework guidelines and travel restrictions, attended virtual trainings offered by organizations external to the Bureau. The Bureau 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 Bureau continues to provide the sufficient budget and ensures sufficient resources are available for the entire Disability and Accessibility Program Section (DAPS). The Bureau’s current budget supports the Bureau’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 Bureau continues to recruit PWD and PWTd using digital and social media outreach such as eQuest, LinkedIn and the Bureau’s career page at [www.consumerfinance.gov/jobs](http://www.consumerfinance.gov/jobs). The Bureau encourages individuals with disabilities to apply under the Schedule A(u) Hiring Authority to open positions, which are posted on USAJobs. The Bureau’s OHC Talent Acquisition 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. In FY 2022, a

Selective Placement Program Coordinator was hired in OHC to assist 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 Bureau 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 Bureau's third-party service provider, Department of Treasury's Bureau of the Fiscal Service (BFS). CFPB continues to leverage the hiring of PWD and PWTD 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 Bureau encourages hiring managers to use non-competitive hiring authorities. Per the Bureau'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 Bureau'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 Bureau'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 Bureau'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 Bureau'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 PWTD, in securing and maintaining employment.

The DAPS Section Chief, along with other Bureau 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 PWTD, 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, DAPS, and OCR as appropriate, coordinate annually on outreach and recruitment strategies and priorities. During FY 2022, DAPS was realigned to OMWI. 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)

1. 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 |

NA

| New Hires                 | Total<br>(#) | Reportable Disability         |                               | Targeted Disability           |                               |
|---------------------------|--------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
|                           |              | Permanent<br>Workforce<br>(%) | Temporary<br>Workforce<br>(%) | Permanent<br>Workforce<br>(%) | Temporary<br>Workforce<br>(%) |
| % of Total Applicants     | 3230         | 3.50                          | 0.87                          | 1.67                          | 0.56                          |
| % of Qualified Applicants | 2617         | 3.48                          | 0.50                          | 1.64                          | 0.27                          |
| % of New Hires            | 32           | 0.00                          | 0.00                          | 0.00                          | 0.00                          |

2. 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 Bureau has four mission critical occupations (MCOs): 0110/Economists, 0301/Miscellaneous Administration & Program, 0570/Examiners, 0905/General Attorneys. In FY 2022, there are triggers for PWD and PWTD for the permanent new hires when compared to the qualified applicant pool for the 0110, 0301 and 0905 series. There were qualified PWD and PWTD in these series, but none of the new hires selected for these series self-identified as PWD or PWTD. There were no selections made in the 0570 series.

| New Hires to Mission-Critical Occupations     | Total<br>(#) | Reportable Disability | Targetable Disability |
|---|--------------|-----------------------|-----------------------|
|   |              | New Hires<br>(%)      | New Hires<br>(%)      |
| Numerical Goal                                | --           | 12%                   | 2%                    |
| 0110 ECONOMIST                                | 8            | 0.00                  | 0.00                  |
| 0301 MISCELLANEOUS ADMINISTRATION AND PROGRAM | 2            | 0.00                  | 0.00                  |

| New Hires to Mission-Critical Occupations | Total<br>(#) | Reportable Disability | Targetable Disability |
|---|--------------|-----------------------|-----------------------|
|   |              | New Hires<br>(%)      | New Hires<br>(%)      |
| Numerical Goal                            | --           | 12%                   | 2%                    |
| 0570 FINANCIAL INSTITUTION EXAMINING      | 0            | 0.00                  | 0.00                  |
| 0905 GENERAL ATTORNEY                     | 16           | 0.00                  | 0.00                  |

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD 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 (PWTD)                          Answer Yes

Triggers exist for the 0570 series because the qualified internal applicants for PWD (4.2%) is lower than the relevant applicant pool for PWD (5.3%). Triggers exists for PWTD (2.8%) too, which is lower than the relevant applicant pool for PWTD (5.3%). The qualified applicant pools that self-identified for the 0110 and 0905 series were too small to analyze.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD 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 (PWTD)                          Answer Yes

Trigger for the 0301 series because the selections of PWD (3.0%) is lower than the qualified applicant pool for PWD (8.3%). Trigger exists for PWTD selections (3.0%) is lower than the qualified applicant pool for PWTD (5.4%).

## 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 PWTD, have sufficient opportunities for advancement.

The OHC will continue to post all internal advancement opportunities, i.e., details, temporary promotions and reassignments on the Bureau’s internal website and ensure that these opportunities are listed on the Daily Announcements feed on the main page of the Bureau’s intranet so that all employees are informed. Additionally, the Bureau’s DAPS Section Chief will continue to encourage PWD and PWTD to apply to opportunities, and promote reassignment, promotion, detail, and temporary promotion opportunities that become available to ensure that PWD and PWTD 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 Bureau’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 Bureau’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 PWTD. The Bureau has

plans outlined in Section VII of this report.

## B. CAREER DEVELOPMENT OPPORTUNITES

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

The Bureau continues to offer career development tools and resources that assist all employees, to include PWD and PWTD, with skill development. The Bureau's Career Development Framework, Career Planning tools, and other internal resources for professional growth and development continue to be available to all Bureau 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 Bureau Team Leader training program, the matrix of courses for Aspiring Leaders, and continued availability of external training and development opportunities. Additionally, the Bureau advertised internal detail opportunities to Bureau employees using a Centralized Detail Posting Process. In FY 2022, Bureau managers leveraged internal details, temporary promotions, and reassignments to develop staff and augment work throughout the fiscal year. Internal career opportunities are posted on the Bureau's intranet site. External vacancies are posted on the Bureau's website, USAJobs, as well as on the Daily Announcements feed on the Bureau's intranet, which is widely seen by all Bureau employees. Employees are also encouraged to apply in the competitive hiring process for any position for which they feel they may qualify. In FY 2022, 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 Bureau also used competitive details to provide general growth opportunities for existing employees. Bureau managers also participate in mandatory management training, which includes training specifically on developing and engaging employees for their growth and development. All Bureau executives and middle managers are eligible to participate in the Bureau's executive coaching program, and in FY 2022 a new First Line Supervisor Cohort Coaching offering was piloted, providing coaching opportunities for Bureau supervisors as well. The CFPB Mentoring Program did not operate in FY 2022 in order to iterate and further improve the program. It is expected to re-launch in FY 2023.

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            |               | PWTD           |               |
|-----------------------------------|--------------------|---------------|----------------|---------------|----------------|---------------|
|                                   | Applicants (#)     | Selectees (#) | Applicants (%) | Selectees (%) | Applicants (%) | Selectees (%) |
| Internship Programs               | 593                | 29            | 3.4            | 3.4           | 2.0            | 3.4           |
| Fellowship Programs               | 472                | 13            | 5.7            | 0.0           | 3.6            | 0.0           |
| Mentoring Programs                | N/A                |               |                |               |                |               |
| Coaching Programs                 | N/A                |               |                |               |                |               |
| 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 Yes

In FY 2022, a trigger exists for applicants in the Internship Programs (3.4% PWD self-identified in the application pool versus the benchmark of 12.0%). A trigger exists for applicants in the Fellowship Program (5.7% PWD self-identified in the applicant pool

versus the benchmark of 12.0%). A trigger exists for selections in the Fellowship Programs (0.0% PWD self-identified of those selected versus 5.7% PWD applied). 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 Yes

In FY 2022, a trigger exists for selections in the Fellowship Programs (0.0% PWTD self-identified of those selected versus 3.6% PWTD applied). Selections in the Fellowship Programs data set included Director's Financial Analysts and Research Assistants.

## C. AWARDS

1. 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 (PWTB)

**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.) 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 Bureau's ongoing barrier analysis work. Total Awards from \$500 and under given: 971 PWD Target (\$500 and under): 109 PWD Benchmark: 192 PWOD Target (\$500 and under): 971-109=862 PWOD Benchmark: 1524-192=1332 PWD IR 56.8% < PWOD 64.7%. This is a trigger. Total Awards from \$501-\$999 given: 194 PWD Target (\$501-\$999): 20 PWD Benchmark: 192 PWOD Target (\$501-\$999): 194-20=174 PWOD Benchmark: 1524-192=1332 PWD IR 10.4% < PWOD 13.1%. This is a trigger. Total Awards from \$2000-\$2999 given: 231 PWD Target (\$1000-\$1999): 24 PWD Benchmark: 192 PWOD Target (\$1000-\$1999): 231-24=207 PWOD Benchmark: 1524-192=1332 PWD IR 12.5% < PWOD 15.5%. This is a trigger. - - - - - Total Awards from 11-20 hours given: 60 PWTD Target (11-20 hours): 1 PWTD Benchmark: 44 PWOTD Target (11-20 hours): 60-1=59 PWOTD Benchmark: 1524-44=1464 PWOTD IR 2.3% < PWOTD 4.0%. This is a trigger. Total Awards from 21-30 hours given: 19 PWTD Target (21-30 hours): 0 PWTD Benchmark: 44 PWOTD Target (21-30 hours): 19-0=19 PWOTD Benchmark: 1524-44=1464 PWOTD IR 0.00% < PWOTD 1.3%. This is a trigger. Total Awards from 31-40 hours given: 12 PWTD Target (31-40 hours): 0 PWTD Benchmark: 44 PWOTD Target (31-40 hours): 12-0=12 PWOTD Benchmark: 1524-44=1464 PWOTD IR 0.00% < PWOTD 0.8%. 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 or more hours category.

| Time-Off Awards                               | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|-----------|-------------------------|---------------------------------|-----------------------|-------------------------------|
| Time-Off Awards 1 - 10 hours:<br>Awards Given | 336       | 21.88                   | 21.78                           | 27.27                 | 20.27                         |

| Time-Off Awards                                 | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|-----------|-------------------------|---------------------------------|-----------------------|-------------------------------|
| Time-Off Awards 1 - 10 Hours: Total Hours       | 3721      | 242.71                  | 243.73                          | 427.27                | 187.84                        |
| Time-Off Awards 1 - 10 Hours: Average Hours     | 11        | 5.73                    | 0.88                            | 34.09                 | -2.70                         |
| Time-Off Awards 11 - 20 hours: Awards Given     | 138       | 10.42                   | 9.00                            | 4.55                  | 12.16                         |
| Time-Off Awards 11 - 20 Hours: Total Hours      | 2559      | 160.42                  | 169.69                          | 70.45                 | 187.16                        |
| Time-Off Awards 11 - 20 Hours: Average Hours    | 18        | 7.81                    | 1.45                            | 34.09                 | 0.00                          |
| Time-Off Awards 21 - 30 hours: Awards Given     | 44        | 1.56                    | 2.97                            | 2.27                  | 1.35                          |
| Time-Off Awards 21 - 30 Hours: Total Hours      | 1164      | 39.58                   | 79.66                           | 63.64                 | 32.43                         |
| Time-Off Awards 21 - 30 Hours: Average Hours    | 26        | 13.02                   | 2.09                            | 63.64                 | -2.03                         |
| Time-Off Awards 31 - 40 hours: Awards Given     | 19        | 1.04                    | 1.37                            | 0.00                  | 1.35                          |
| Time-Off Awards 31 - 40 Hours: Total Hours      | 728       | 33.33                   | 53.38                           | 0.00                  | 43.24                         |
| Time-Off Awards 31 - 40 Hours: Average Hours    | 38        | 16.67                   | 3.14                            | 0.00                  | 21.62                         |
| Time-Off Awards 41 or more Hours: Awards Given  | 0         | 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     | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$501 - \$999: Total Amount     | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$501 - \$999: Average Amount   | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$1000 - \$1999: Awards Given   | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$1000 - \$1999: Total Amount   | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$1000 - \$1999: Average Amount | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$2000 - \$2999: Awards Given   | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$2000 - \$2999: Total Amount   | 0         | 0.00                    | 0.00                            | 0.00                  | 0.00                          |
| Cash Awards: \$2000 - \$2999: Average Amount | 0         | 0.00                    | 0.00                            | 0.00                  | 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. The Bureau does have a program allowing for colleagues and supervisors to recognize individuals for work-related accomplishments (e.g., through certificates of appreciation). However, data are not collected on the demographics of these forms of employee recognition.

## 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 No

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD)                          Answer Yes
  - ii. Internal Selections (PWD)                          Answer No
  
- 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. The qualified internal applicants who self-identified as PWD (2.70%) are lower than the relevant applicant pool who are PWD (10.97%). CN-71 (GS-15 equivalent): There is a trigger for qualified internal applicants and internal selections. The qualified internal applicants who self-identified as PWD (7.66%) are lower than the relevant applicant pool (12.22%). The internal selections who self-identified as PWD (0.00%) are lower than the qualified applicant pool who are PWD (7.66%). CN-60 (GS-14 equivalent): There is a trigger for qualified internal applicants. The qualified internal applicants who self-identified as PWD (7.30%) are lower than the relevant applicant pool who are PWD (11.58%). CN-53 (GS-13 equivalent): There is a trigger for qualified internal applicants. The qualified internal applicants who self-identified as PWD (6.63%) are lower than the relevant applicant pool who are PWD (18.05%).

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 No
  
  - b. Grade GS-15
    - i. Qualified Internal Applicants (PWTD)                          Answer No
    - ii. Internal Selections (PWTD)                          Answer Yes
  
  - 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 No

CN-71 (GS-15 equivalent): There is a trigger for internal selections. The internal selections who self-identified as PWTD (0.00%) are lower than the qualified applicant pool who are PWTD (5.22%). CN-60 (GS-14 equivalent): There is a trigger for internal selections. The internal selections who self-identified as PWTD (3.45%) are lower than the qualified applicant pool who are PWTD (5.84%).

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 | Yes |
| c. New Hires to GS-14 (PWD) | Answer | Yes |
| d. New Hires to GS-13 (PWD) | Answer | Yes |

CN-71 (GS-15 equivalent): 0.00% of new hires were PWD compared with 4.16% qualified applicants who self-identified as PWD.  
 CN-60 (GS-14 equivalent): 0.00% of new hires were PWD compared with 13.67% qualified applicants who self-identified as PWD.  
 CN-53 (GS-13 equivalent): 0.00% of new hires were PWD compared with 4.55% 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): 0.00% of new hires were PWTD compared with 2.56% qualified applicants who self-identified as PWTD. CN-60 (GS-14 equivalent): 0.00% of new hires were PWTD compared with 2.45% qualified applicants who self-identified as PWTD. CN-53 (GS-13 equivalent): 0.00% of new hires were PWTD compared with 2.81% 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 | No  |
| b. Managers                            |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | No  |
| ii. Internal Selections (PWD)          | Answer | Yes |
| c. Supervisors                         |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | No  |
| ii. Internal Selections (PWD)          | Answer | No  |

Executives: There is a trigger for qualified internal applicants. The qualified internal applicants who self-identify as PWD (2.70%)

is lower than the relevant applicant pool who are PWD (10.97%). Managers: There is a trigger for internal selections. Internal selections who self-identify as PWD (0.00%) are lower than the qualified internal applicants who self-identify as PWD (7.78%).

6. 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    No

b. Managers

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

c. Supervisors

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

Managers: There is a trigger for internal selections. The internal selections who self-identified as PWTB (0.00%) are lower than the qualified internal applicants who self-identify as PWTB (5.87%).

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 (0.00%) are lower than the qualified external applicants who self-identified as PWD (4.89%).

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 (0.00%) are lower than the qualified external applicants who self-identified as PWTB (3.60%).

## 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

1. 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

There were two employees on Schedule A(u) appointments who had delayed conversions that were each processed a few months after two years of satisfactory service were completed. These delays occurred due to the extended absence of the hiring manager and the absence of the employee's name on the tracking report in one instance, and a delay in the processing of the action due to a missed follow-up from the staffing consultant when obtaining the hiring manager's decision. The Bureau shifted the Selective Placement Program Coordinator role to the Talent Acquisition and Staffing Team in OHC who will have responsibility for monitoring the Schedule A(u) employee conversion timelines to minimize delays in the conversion process.

2. 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 Yes

b. Involuntary Separations (PWD)

Answer No

Using the inclusion rate, triggers exist for PWD (9.38%) who voluntarily separated from the agency at a higher rate than persons without disabilities (6.76%).

| Separations                             | Total # | Reportable Disabilities % | Without Reportable Disabilities % |
|---|---------|---------------------------|-----------------------------------|
| Permanent Workforce: Reduction in Force | 0       | 0.00                      | 0.00                              |
| Permanent Workforce: Removal            | 3       | 0.00                      | 0.21                              |
| Permanent Workforce: Resignation        | 45      | 2.48                      | 2.79                              |
| Permanent Workforce: Retirement         | 33      | 5.45                      | 1.54                              |
| Permanent Workforce: Other Separations  | 24      | 0.99                      | 1.54                              |
| Permanent Workforce: Total Separations  | 105     | 8.91                      | 6.08                              |

3. 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 (13.64%) who voluntarily separated from the agency at a higher rate than persons without targeted disabilities (6.89%).

| Separations                             | Total # | Targeted Disabilities % | Without Targeted Disabilities % |
|---|---------|-------------------------|---------------------------------|
| Permanent Workforce: Reduction in Force | 0       | 0.00                    | 0.00                            |
| Permanent Workforce: Removal            | 3       | 0.00                    | 0.19                            |
| Permanent Workforce: Resignation        | 45      | 2.17                    | 2.77                            |
| Permanent Workforce: Retirement         | 33      | 10.87                   | 1.76                            |

| Separations                            | Total # | Targeted Disabilities % | Without Targeted Disabilities % |
|--|---------|-------------------------|---------------------------------|
| Permanent Workforce: Other Separations | 24      | 0.00                    | 1.51                            |
| Permanent Workforce: Total Separations | 105     | 13.04                   | 6.23                            |

4. 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, 11 out of 18 (61%) persons with a disability retired compared with 22 out of 90 (24%) for persons without a disability. The data also reflects that persons with a targeted disability separated via a retirement at a higher rate than those without a disability. During FY 2022, there was a 70% response rate to the exit survey. 12.8% (11 out of 86) of respondents who responded to the survey self-reported having a disability. For the question, "Which of the following statements BEST describes the reason for your separation from the CFPB?", 36% of those who self-reported having a disability indicated they "retired voluntarily" (compared with 20% without a self-reported disability) and 36% indicated they "resigned to leave the Federal government" (compared with 42% without a self-reported disability). An additional 9% of those who self-reported having a disability indicated they "retired due to a disability" (compared with 0% without a self-reported disability). 100% of those who self-reported having a disability indicated "yes" or "maybe" to the question, "If possible, would you work for the CFPB again?" (compared with 87% of those without a self-reported disability). Those who self-reported having a disability were asked "While you were employed at the Bureau, did you ever have an experience where you did not feel included in a Bureau activity or program because of your disability?" 18% reported "occasionally" or "frequently" and 82% reported "never". For this item, "I needed to care for my personal health or that of another individual.", 45% of individuals with a self-reported disability rated this as very important or somewhat important (compared with 23% without a self-reported disability). For this item, "I wanted to relocate.", 36% of individuals with a self-reported disability rated this as very important or somewhat important (compared with 14% of individuals without a self-reported disability). For this item, "The job was too stressful.", 36% of individuals with a self-reported disability rated this as very important or somewhat important (compared with 28% of individuals without a self-reported disability). From the exit survey comments, one respondent indicated they wished the "[Bureau's Personal Assistance Services] would be promoted more broadly". Another respondent indicated they thought "more broad visibility about what it means to accommodate and support "invisible disabilities" and those who are "differently wired" would be really helpful. An employee resource group on neural diversity would likely help many staff feel less alone." Another individual indicated they retired early due to a medical condition and would have considered part-time if it were an option.

## 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 2022, the Bureau's DAPS Section Chief led working group efforts to partner with Bureau Administrative Operations, Facilities, and Technology & Innovation (T&I) offices to ensure that accessibility to Bureau facilities and technology are considered

in Bureau services and the procurement of supplies and services. Contact information for accessibility inquiries remain on the Bureau's external website. With the increase in virtual meetings due to mandatory and maximum telework requirements, the Bureau increased its closed captioning budget within T&I to ensure that Bureau-wide meetings and events have appropriate funding. As we work to elevate the "A" in accessibility; all Bureau documents and systems must go through a clearance process to ensure 508 compliance. 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. During FY 2022, the DAPS Section Chief and the 508 Program Manager implemented a 508 program workplan that outlined metrics and milestones to create Bureau-wide 508 program policies and procedures that would improve the accessibility of technology for PWD and PWTD. While the CFPB remained on mandatory or maximum telework for FY 2022, all Bureau buildings and facilities remained compliant under the Architecture Barriers Act, maintaining equal access to buildings for PWD and PWTD. The Bureau developed its Diversity, Equity, Inclusion and Accessibility (DEIA) Strategic Plan for FY 2022-2026. It will include goals and actions related to facility accessibility improvements.

## 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 2022, the Reasonable Accommodation program processed 116 reasonable accommodation cases, with an average processing time of 7 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 Bureau 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 Bureau remains committed to providing reasonable accommodations services to all employees and applicants for Bureau 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 Bureau. The Bureau'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 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 Bureau'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 2022, the Bureau 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 (Bureau's intranet) for all employees. During FY 2022, the Bureau 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 Bureau continues to utilize the Entellitrak system, the Bureau's electronic database for reasonable accommodations, to track reasonable accommodations data. Some highlights from the Reasonable Accommodation Entellitrak

reporting for FY 2022 are as follows: Of the 116 RA cases processed in FY 2022 (average processing time of 7 days), the Bureau had 112 cases in which accommodations were granted (including four cases in which the requestor was provided alternate accommodations). In providing ergonomic equipment and assistive technology accommodations in FY 2022, the Bureau spent approximately \$37,943.76 from its centralized reasonable accommodations budget, averaging \$1,495.38 per case for each request that required an expenditure. The Bureau also spent \$43,999.80 for American Sign Language Interpretation accommodations and accessibility services, and \$60,022.01 for Sprint closed captioning accommodations and services in FY 2022.

## 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 Bureau'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 Bureau's process for determining whether such services are required, and the Bureau's determination to deny PAS requests when it would pose an undue hardship, are the same processes as for reasonable accommodation. The Bureau had 5 requests for PAS in FY 2022 and spent \$747.68. The Bureau has a contract in place in the event that an employee requests PAS services. 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.

NA – there were no findings of discrimination during the last fiscal year. According to the EEOC's benchmark, 21.98% 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 2022, 1 out of the 13 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 7.69% (1/13) -- below the government-wide benchmark of 21.98%.

### 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 No

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.

NA – there were no findings of discrimination during the last fiscal year. According to the EEOC’s benchmark, 14.03% 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 2022, 0 out of the 13 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 0.00% (0/13) – below the government-wide benchmark of 14.03%.

## 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><br><br>Provide a brief narrative describing the condition at issue.<br><br>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><br>People with Disabilities   |                                |  |                             |  |
| <b>Barrier Analysis Process Completed?:</b>   | N  |                                |  |                             |  |
| <b>Barrier(s) Identified?:</b>  | Y  |                                |  |                             |  |
| <b>STATEMENT OF IDENTIFIED BARRIER:</b><br><br>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 1  |                                | Limited career advancement opportunities for Persons with a Disability |                             |  |
|   | Barrier 2  |                                | Opaque promotion and detail selection processes                        |                             |  |
| <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.

Many items are started, but not yet finalized. Other items are awaiting additional support (e.g., contract support) that is expected during FY 2023.

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 is providing 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 will further inform any larger roll out that we hope to see as we look to eliminate the barrier of limited career advancement opportunities for PWD. DEIA goals and metrics are also incorporated in senior level discussions through BPR, which elevates management accountability. For the second barrier, OHC selected an SPPC and further refined materials (e.g., Selection

Job Aid and hiring selection form). Having the designated resource and clearer materials 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