

March 2016

# Equal Employment Opportunity (EEO) program status report for fiscal year (FY) 2015



# Table of contents

<b>Table of contents.....</b>	<b>1</b>
<b>1. Agency identifying information .....</b>	<b>3</b>
<b>2. Total employment .....</b>	<b>4</b>
<b>3. Leadership .....</b>	<b>6</b>
<b>4. List of subordinate components covered in this report.....</b>	<b>7</b>
<b>5. Executive summary .....</b>	<b>8</b>
5.1 Essential Element 1: Demonstrated commitment from agency leadership .....	10
5.2 Essential Element 2: Integration of EEO into agency's strategic mission	14
5.3 Essential Element 3: Management and program accountability .....	25
5.4 Essential Element 4: Proactive Prevention .....	29
5.5 Essential Element 5: Efficiency .....	33
5.6 Essential Element 6: Responsiveness and legal compliance .....	35
<b>6. Summary of work force profiles .....</b>	<b>37</b>
<b>7. Workplace analysis .....</b>	<b>38</b>
7.1 Permanent workforce: Participation of class grouping .....	40
7.2 Temporary workforce: participation of class grouping.....	41

7.3	Analysis of senior pay bands by grouping (permanent employees) .....	42
7.4	New hires: Permanent .....	43
7.5	New hires: Temporary .....	44
7.6	New hires by mission critical occupations .....	45
7.7	Non-competitive promotion eligibility.....	50
7.8	Separations .....	52
7.9	Awards .....	56
<b>8.</b>	<b>Certification of establishment of continuing equal employment opportunity programs .....</b>	<b>58</b>
<b>9.</b>	<b>EEO program status report.....</b>	<b>59</b>
<b>10.</b>	<b>EEO plan for attaining the essential elements of model EEO program .....</b>	<b>60</b>
<b>11.</b>	<b>EEO plan to eliminate identified barriers.....</b>	<b>63</b>
<b>12.</b>	<b>Special program plan for the recruitment, hiring, and advancement of individuals with targeted disabilities .....</b>	<b>73</b>

# 1. Agency identifying information

TABLE 1: AGENCY IDENTIFYING INFORMATION

Part A	
1. Agency	Consumer Financial Protection Bureau
2. Address	1700 G Street NW
3. City, State, Zip code	Washington, DC 20552
4. CPDF Code	FR FT
5. FIPS code	110001, 06075, 176031, 36061

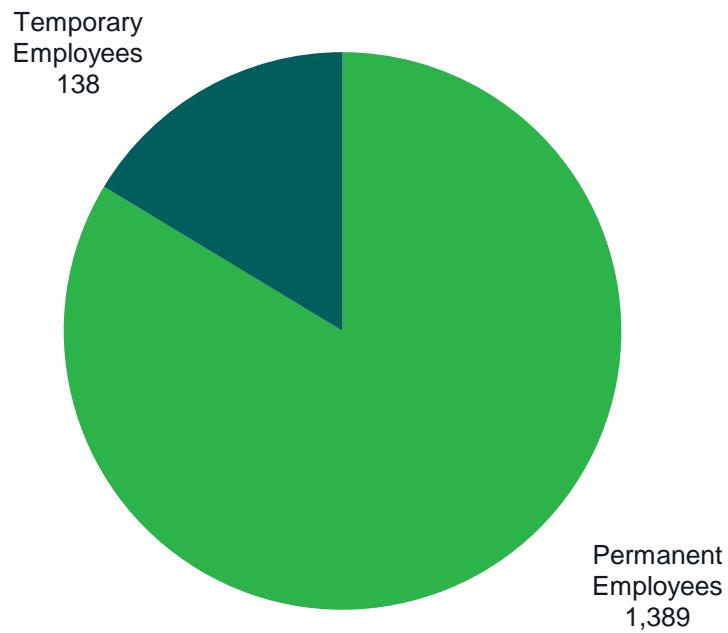
## 2. Total employment

TABLE 2: TOTAL EMPLOYMENT

<b>Part B</b>	
Permanent full-time and part-time employees	1,389
Temporary employees	138
Employees paid from non-appropriated funds	0
Total employment	1,527

Data as of September 30, 2015.

**FIGURE 1:** TOTAL EMPLOYMENT



### 3. Leadership

TABLE 3: LEADERSHIP

Part C	
Head of agency	Richard Cordray Director, Consumer Financial Protection Bureau
Agency Head Designees	Stuart Ishimaru Director, Office of Equal Opportunity & Fairness M. Stacey Bach Director, Office of Civil Rights

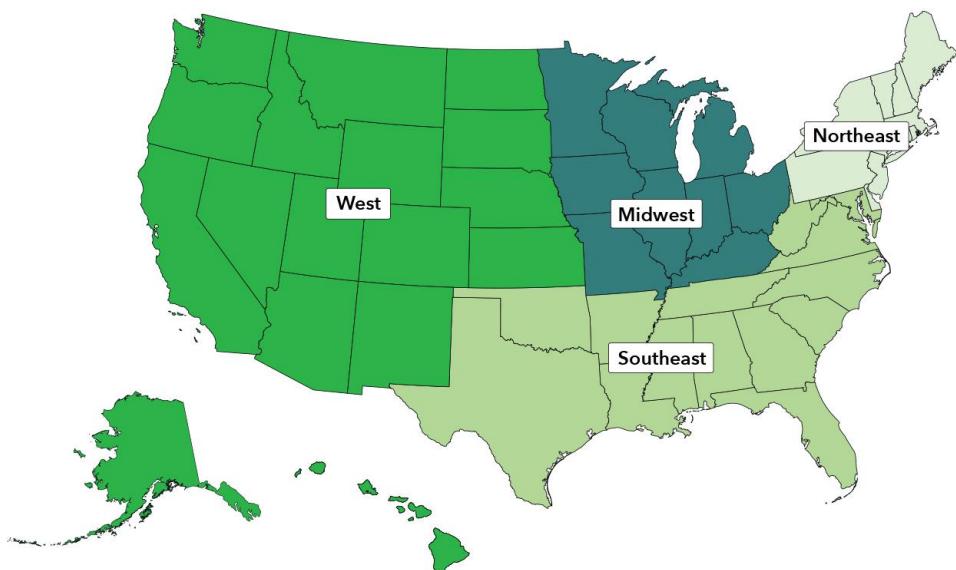


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Richard Cordray, Director, Consumer Financial Protection Bureau

## 4. List of subordinate components covered in this report

**FIGURE 2:** CFPB SUPERVISION REGIONS



### Regions

- Northeast
- Southeast
- Midwest
- West

## 5. Executive summary

### Mission

The Consumer Financial Protection Bureau (CFPB or Bureau) is the nation's first federal agency focused solely on consumer financial protection. The Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203) (July 21, 2010) (Dodd-Frank Act) created CFPB to protect consumers and to encourage fair and competitive consumer financial markets. CFPB officially began operations on July 21, 2011.

CFPB's mission is to make markets for consumer financial products and services work for people in America—whether they are applying for a mortgage, choosing among credit cards, or using any number of other consumer financial products. CFPB helps consumer finance markets work by making rules more effective, by consistently and fairly enforcing those rules, and by empowering consumers to take more control over their lives. When CFPB achieves its mission, it will have facilitated the development of a consumer finance marketplace where consumers can see prices and risks and can easily make product comparisons. The envisioned consumer finance marketplace will work for consumers in America, responsible providers, and the economy.

CFPB is achieving its mission and vision through data-driven analysis, innovative use of technology, and valuing great teamwork and top talent. CFPB is using data purposefully to support informed decision-making in all internal and external functions. CFPB strives to be an innovative, 21st century agency in its approach to technology. Finally, CFPB invests in world-class training, development, and support to create an environment that encourages employees at all levels to tackle complex challenges.

To accomplish these goals, the CFPB is divided into six Divisions:

- Consumer Education & Engagement (CEE)
- Supervision, Enforcement, & Fair Lending (SEFL)

- Research, Markets, & Regulations (RMR)
- External Affairs (EA)
- Legal (LD)
- Operations (OPS)

These Divisions work together to:

- Write rules, supervise regulated entities, and enforce federal consumer financial protection laws;
- Restrict unfair, deceptive, or abusive acts or practices;
- Take consumer complaints;
- Promote financial education;
- Research consumer behavior;
- Monitor financial markets for new risks to consumers; and
- Enforce laws that outlaw discrimination and other unfair treatment in consumer finance.

## Report Overview and EEO Structure

This Equal Employment Opportunity (EEO) Program Status Report for Fiscal Year (FY) 2015 highlights CFPB's accomplishments in FY2015 in continuing to establish and solidify an EEO Program and identifies areas where the Bureau will take further actions to enhance its EEO Program. During FY2015, CFPB demonstrated its commitment to ensuring that talented and diverse staff have equal employment opportunities and are treated fairly and with respect, and that Bureau leadership enforced the standards of fairness that it expects of the companies and industries it regulates.

The accomplishments highlighted in this report stem from collaboration between the various CFPB offices responsible for aspects of the agency's EEO program. The Bureau has an Office of Equal Opportunity and Fairness (OEOF), which is housed directly in the Office of the Director of CFPB. OEOF is comprised of the Office of Civil Rights (OCR) and the Office of Minority and Women Inclusion (OMWI).

The Director of OCR (formerly known as the EEO Office) reports directly to the Director of CFPB. OCR has internally operated since February 2013. It works to ensure that CFPB complies with all federal EEO laws and related civil rights protections; provides a neutral forum for the discussion, investigation, and resolution of certain EEO matters; and strives to integrate EEO into CFPB's everyday work. OCR also strives to empower individuals to participate constructively to their fullest potential in support of the CFPB's mission. OCR endeavors to ensure that CFPB reflects the rich diversity of the nation and provides a full and fair opportunity for all employees and applicants, and that CFPB employees have the working environment that will support them in their efforts to protect consumers. OCR maximizes its partnership with Bureau leadership, employees, management, and the National Employees Treasury Union (NTEU) to achieve this vision. While OCR maintains primary responsibility for the Agency's overall EEO program, it collaborates extensively with both OMWI and the Bureau's Office of Human Capital (OHC) to ensure fairness and equality under the law for all employees and applicants for employment. OCR cooperates with OHC, in particular, related to the reasonable accommodation and harassment prevention programs OHC administers.

Pursuant to Section 342 of the Dodd-Frank Act, OMWI develops standards for equal employment opportunity and diversity, which OHC incorporates into CFPB Human Capital Management. OCR, OMWI, and OHC monitor the impacts and results of these standards, cultivate successful policies and practices to reinforce them, and develop enhancement strategies to strengthen all EEO and diversity and inclusion programs Bureau-wide.

## EEO plan action items and self-assessment

CFPB developed and implemented action items for its EEO Plan as set forth in its fiscal year 2014 status report. Throughout FY2015, CFPB implemented most of the action items and made significant strides in developing a model EEO Program by conducting self-assessments pursuant to MD-715, and incorporating the following essential program elements described in this report.

### 5.1 Essential Element 1: Demonstrated commitment from agency leadership

The Bureau is committed to maintaining a workplace that promotes professionalism and productivity, respects the dignity of all, and embraces education of employees about their EEO rights and responsibilities. When potential EEO issues are identified, the Bureau quickly

commits to diagnosing issues and taking appropriate corrective action as warranted and appropriate.

Further demonstrating commitment from CFPB leadership, the Bureau ensures that all EEO policy statements are timely and current. The Bureau has re-issued annually EEO policy statements, with the latest statement issued in July 2015, reaffirming CFPB's zero tolerance for workplace discrimination, harassment, or retaliation. The policy statements affirm that the CFPB Director, the OCR Director,<sup>1</sup> CFPB managers, and front-line supervisors will uphold and enforce the principles of EEO. The policy statements make it clear that equal employment opportunities exist for all employees and applicants for employment, regardless of their race, color, religion, sex (including pregnancy, sexual orientation, and gender identity), national origin, age, disability, genetic information, or prior protected EEO-related activity. The CFPB Director also issued a No FEAR Act statement in July 2015, as he does annually, which is available to all CFPB employees, former employees, and applicants on CFPB's external website. CFPB provides new employees with the No FEAR Act statement, the EEO policy and anti-harassment statement, and other relevant policies during orientation and again provides them to employees promoted to supervisory ranks.

Further, since the day he first took office, CFPB's Director, Richard Cordray, has publically demonstrated commitment to the EEO program in additional ways. In a recent example, during calendar year 2015, he elevated the position of OCR Director to an executive position, underscoring the fundamental importance of OCR's work to the Bureau. Additionally, Director Cordray announced to all employees that the Bureau is committed to targeted recruitment for individuals with disabilities, and that he wants to work with other agencies to learn about their initiatives to increase the hiring of individuals with disabilities.

In addition, every week the Director sends out a "Weekly Message" to all employees that talks about the important work the Bureau has recently accomplished. These communications often include messages regarding equal employment opportunity and diversity and inclusion, and how these principles relate in practice to the mission and operations of the Bureau.

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<sup>1</sup> The OCR Director is a CFPB Assistant Director. For purposes of this report, the term "OCR Director" will be used.

**TABLE 4:** EEO TOPICS IN DIRECTOR'S WEEKLY MESSAGE DURING FY2015

EEO Topics in Director's Weekly Message	Date of Weekly Message
Highlighted National Disability Employment Awareness Month & Helpful Disability Etiquette Tips.	October 5, 2015
Emphasized need to treat each other honestly and civilly.	September 28, 2015
Reiterated the need for valuing diversity and inclusion.	September 21, 2015
Noted launch of the Bureau's Diversity and Inclusion Council of Employees (DICE), and his personal commitment to meeting with DICE at least twice per year.	September 8, 2015
Noted passing of civil rights leaders Julian Bond & Louis Stokes; explained "We are not immune from workplace incidents of harassment or inappropriate conduct; together, we must each do our part to help attain the culture we expect and deserve, in which everyone here feels heard, valued, and respected"; gave "[s]pecial thanks to the team in our Office of Civil Rights for their steady work to promote fairness, equity, and inclusion at the Bureau."	August 24, 2015
Noted issuance of Director's Annual EEO & Workplace Harassment Policy Statement & No FEAR Act and Whistleblower Notice; emphasized his personal commitment to EEO principles and that OCR's "door is always open."	July 20, 2015
Noted June is LGBT Pride Month, and highlighted release of Federal guide to help employees understand options for pursuing sexual orientation or gender identity discrimination claims; explained that the EEOC has ruled that both are forms of sex discrimination.	June 8, 2015
Highlighted the 25th Anniversary of the Americans with Disabilities Act, and noted ROADS project aimed at improving the financial well-being of people with disabilities.	June 8, 2015
Noted OMWI World Diversity Day Celebration, explaining that a "variety of backgrounds and perspectives also helps improve our work for consumers, as our different viewpoints allow us to see difficult and complex issues from many sides" and stating that "[o]ur commitment to this principle was highlighted in the "business case" for diversity that OMWI just circulated on behalf of the Bureau."	June 8, 2015
Noted CFPB's commemorating Asian American & Pacific Islander (AAPI) Heritage Month by reaching out to AAPI community leaders to learn more about how consumer finance issues affect AAPI communities.	June 1, 2015

EEO Topics in Director's Weekly Message	Date of Weekly Message
Noted CFPB's celebration of World Day for Cultural Diversity to be held on 6/4/2015.	June 1, 2015
Noted visit from Principal Deputy Assistant Attorney General for U.S. DOJ, Civil Rights Division, Vanita Gupta for Asian American & Pacific Islander Heritage Month.	May 4, 2015
Noted Section 508 of the Rehabilitation Act presentation by Jennifer Horan at the DotGov Design Conference.	April 20, 2015
Stressed efforts to be a "family friendly" Agency and solicited ideas to better achieve that goal.	April 20, 2015
Noted Women's History Month speaker Barbara DeSoer (CEO Citibank).	March 30, 2015
Noted meeting with Urban Financial Services Coalition (whose mission includes expanding employment opportunities for minorities in the financial services industry).	March 30, 2015
Noted CFPB Black History Month speaking events (2/24 Kenneth Chenault, CEO, American Express and 2/26 U.S. Congressman Emanuel Cleaver).	February 23, 2015
Noted CFPB Black History Month speaking events (2/24 Kenneth Chenault, CEO, American Express and 2/26 U.S. Congressman Emanuel Cleaver).	February 9, 2015
Noted his personal support for upcoming workshops on Leading Diversity and Inclusion, stating he and the Bureau's Executive Committee had already taken the workshops which they found to be "productive and beneficial," and emphasizing the importance of ensuring "the Bureau fully realizes the benefits of a diverse and inclusive workplace where everyone has the opportunity to be fully effective and productive."	February 9, 2015
Reflected on the importance of Martin Luther King weekend, emphasizing that Dr. King once said that life's most persistent and urgent question is: "What are you doing for others?"; observed that CFPB is continuing some of the work Mr. King started by safeguarding protections for consumers.	January 20, 2015
Relayed that CFPB Ranked 4th in support for diversity in the Partnership for Public Service's annual "Best Places to Work" list.	December 15, 2014
Noted transition and placement of EEO Office into the Office of the Director and emphasized the "critical mission" of "promoting equity and fairness within the Bureau."	December 8, 2014
Responded to Annual Employee Survey and OMWI Listening Session by announcing a new tool on the intranet to advertise and view detail opportunities.	November 17, 2014

EEO Topics in Director's Weekly Message	Date of Weekly Message
Noted and distributed memo he recently signed on whistleblower and prohibited personnel practices protections and the Office of Special Counsel.	November 10, 2014
Mentioned his speech to Michigan State University commemorating the 60th anniversary of the Supreme Court's decision in <i>Brown v Board of Education</i> and the 50th anniversary of the Civil Rights Act of 1964.	October 27, 2014
Noted Conflict Resolution Day on October 16 and circulated a link to ADR materials.	October 14, 2014
Highlighted Hispanic Heritage Month events.	October 14, 2014

These are just a few examples of the many actions Director Cordray has taken to show his strong personal commitment to guaranteeing equal employment opportunities for all employees. All of the initiatives described in this report would not have been possible without the Director's championship of the EEO program.

## 5.2 Essential Element 2: Integration of EEO into agency's strategic mission

### Reporting structure

The CFPB's reporting structure allows the OCR Director to have direct and regular access to CFPB's Director and other senior level management officials. OCR is located within OEOF, which is a part of the CFPB Director's Executive Office. The OCR Director reports directly to the CFPB Director on EEO matters and to the OEOF Director on all administrative matters. This reporting structure allows the EEO program to be run efficiently and effectively. Critically, this reporting structure provides the OCR Director with the autonomy and authority needed to carry out a successful EEO Program.

The major duties and responsibilities of the OCR Director are clearly defined and include developing, implementing, and managing comprehensive, broad-scope CFPB EEO policies, programs, and services. The OCR Director also serves as the principal technical advisor to the CFPB Director and to the Bureau's leadership on EEO and civil rights issues and policies.

Further, the OCR Director has access to other senior management officials for reporting on the effectiveness, efficiency, and legal compliance of the Bureau's EEO program. The OCR Director meets monthly with CFPB's Director and the CFPB Chief of Staff, and meets quarterly with senior leadership, including the CFPB Director, the CFPB Deputy Director, the OMWI Director, and all CFPB Associate Directors to provide updates on the EEO Program. For example, following the submission of the Bureau's FY2014 EEO Program Status Report, the OCR Director presented to the CFPB's Director and other senior officials the "State of the Agency" briefing, which covered all components of the Bureau's Status Report. During other quarterly senior leadership meetings, the OCR Director provided additional EEO-related updates to management and supervisory officials. In FY2015, the Quarterly Performance Review (QPR) process also allowed a guided dialogue between OEOF, individual divisions, and the Office of the Director where compliance, diversity, and inclusion metrics are assessed.

## Collaboration

To ensure integration of EEO into the Bureau's strategic mission, the OCR Director collaborates closely with OHC and OMWI. Positive working relationships have been established that support information-sharing and best practices among the offices. The Chief Human Capital Officer and OCR Director meet to discuss whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC regulations, Management Directives (MDs), and other guidance. Further, OHC confers with OMWI and OCR for advice and consultation for guidance on diversity outreach strategy and approach, training curriculum and goals, and operational improvements that support compliance and diversity before making decisions.

OHC, OCR, and OMWI also have continued discussions started in FY2014 to better define roles and responsibilities among the offices, and then to acquire and assign additional personnel resources, as necessary, to support the EEO Program.

## Resources for the EEO program

The success of any EEO Program depends on adequate resources. During FY2015, the Bureau allocated additional resources OCR requested to ensure that the EEO Program remains successful and operates in an effective manner. This has proved vital to ensuring integration of EEO into agency's strategic mission.

OCR secured approval to onboard additional full-time personnel resources, including a shared administrative resource with OMWI; a shared data analyst resource with OMWI (sited within

OHC) to perform trend and other data analyses; and a Conflict Prevention Program Manager to focus on enhancements to EEO and non-EEO alternative dispute resolution (ADR) options. OCR also received approval to leverage members of the Bureau’s Diversity and Inclusion Committee of Employees (DICE) to potentially serve as collateral duty special emphasis program managers (SEPMs) as part of their DICE obligations. OCR will continue to work with OMWI on affirmative employment goals, and with CFPB’s Culture Team to plan and execute heritage month events. CFPB will also work to enhance the hiring, promotion, and retention of individuals with disabilities at all CFPB Pay Bands by leveraging existing resources, particularly with respect to increasing the number of employees with targeted disabilities.

In addition, resources—through CFPB staff in OEOF and OHC, contractors, and detailees —are available to identify and work to eliminate barriers to employment for protected groups. Personnel work together to gather and analyze relevant data (e.g., workforce statistics, complaints data, surveys, focus groups, exit interviews, anecdotal accounts), identify triggers and barriers, devise action plans, and then follow-up to determine the success of the action plans. OCR also has resources available through staff and contractors to ensure that allegations of unlawful discrimination in the workplace are processed in accordance with 29 C.F.R. Part 1614 requirements. In FY2015, all counseling and mediations were completed within regulatory time limits, even though there was higher than government average complaint rate and a number of ongoing external audits of the office. All Final Agency Decisions (FADs) issued by OCR in FY2015 were also timely (another FAD scheduled to be issued in FY2015 was delayed due to a supplemental investigation), and most investigations were completed within regulatory timeframes.

Finally, financial resources are allocated to ensure that Bureau staff are adequately trained and have equal opportunities for career advancement. For example, virtually all (over 90 percent) supervisors and managers had attended the EEOC Training Institute training that covers a history of EEO laws, the Federal EEO Complaint Process, Reasonable Accommodation, ADR, and Management Responsibilities in Preventing Harassment and Retaliation. Over 80 percent of employees completed mandatory No FEAR Act training in FY2015, and nearly 90 percent of employees completed mandatory harassment prevention training in FY2015. Additionally, 89% of managers have completed a mandatory 2-day diversity and inclusion workshop.

## Attracting, developing, and retaining EEO staff

One vital element to ensuring that EEO is integrated into the mission of the Bureau is to attract, train, and keep well-qualified staff within OCR. During FY2015, OCR hired an experienced Senior Counsel (the position title was later changed to Deputy Director) who previously worked at the EEOC for approximately fourteen years. This individual assists with the day-to-day supervision of the EEO Program and its activities. CFPB also onboarded an OMWI Deputy Director—a civil rights expert with more than twenty years of experience—who serves as an OCR partner and advocate for the EEO Program. As mentioned above, OCR has been allocated additional personnel resources, and OCR will work to onboard excellent candidates for each position as soon as possible.

OCR staff have also received training to maintain the competencies necessary to accomplish the Bureau's EEO functions and mission. OCR management has provided or authorized various types of training (including webinars and presentations on significant EEOC cases) and procured helpful resources (such as current-awareness periodicals, treatises, and advanced research tools) to equip EEO staff with the knowledge and skills essential for a successful EEO program. Formal trainings attended by EEOC staff are included in the below table.

**TABLE 5:** RECENT EEO STAFF TRAINING

Training	Date
LGBT Cultural Competency Training	January 28, 2015
Dismissing Federal EEO Complaints	February 11, 2015
Report Template Training	April 15, 2015
New Counselor Training	April 27 to May 1, 2015
Federal Dispute Resolution Seminar	August 3-6, 2015
Examining Conflicts in Employment Laws (EXCEL) Conference	August 10-13, 2015

## Recruiting, hiring, developing, and retaining supervisors and managers

To ensure that EEO is integrated into the daily mission of the Bureau, the Bureau works to hire, develop, and retain supervisors and managers who have effective managerial, communication,

and interpersonal skills to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications. OCR staff works with OHC's Talent Acquisition (TA) Team and OMWI personnel to support strategic and targeted recruitment efforts. An OMWI employee has been designated to oversee the recruitment of specific groups such as African Americans, Asian Americans, Women, Hispanics, individuals with disabilities, the LGBT community, and veterans.

In June 2015, OHC developed 2015 Recruitment and Outreach Plan designed to enhance the Bureau's recruitment process, including the recruitment of executive applicants. The purpose of this plan is to provide CFPB managers with a snapshot of event-based outreach activities targeted towards diverse populations, and to highlight the recruiting approaches used by the Bureau. This plan was developed in collaboration with OEOF (i.e., OMWI and OCR), with an eye towards incorporating best practices in diversity recruitment.

The plan is designed to support and achieve several goals, one of which is to recruit experienced professionals. The Bureau values the experience and expertise of seasoned professionals and alumni who can be found through affinity events. These events provide access to mid-level and senior-level talent from the private and public sectors who are potential candidates for management and executive positions (should internal executive selections not be made from the internal management pools).

The 2015 plan focused on event-based recruiting. While event-based recruiting represents only one component of the Bureau's diversity outreach efforts, the Bureau identified this recruitment approach as a priority. The recruitment events for FY 2015 are included in the below table.

**TABLE 6:** 2015 RECRUITMENT EVENT SPONSORS

<b>2015 Recruitment Event Sponsors</b>
Association of Latino Professionals in Finance & Accounting (ALPFA)
National Association of Black Accountants (NABA)
League of United Latin American Citizens (LULAC)
National Council of La Raza (NCLR)
National Association for the Advancement of Colored People (NAACP)
The National Bar Association (NBA)

<b>2015 Recruitment Event Sponsors</b>
National Urban League (NUL)
American Indian Higher Education Consortium (AIHEC)
Ascend Pan-Asian Membership Organization
Hispanic National Bar Association
Congressional Black Caucus
National Black MBA Association
Hispanic Association of Colleges & Universities (HACU)
National Society of Hispanic MBAs
LGBT Bar Association
National Association of Women MBAs
National Asian Pacific American Bar Association Annual Convention
National Association of Asian MBAs
Careers & disABLED magazine

To develop and retain managers and supervisors, the Bureau has provided managers and supervisors with appropriate training to ensure that they have the skills and competencies to fulfill their responsibilities and duties under the Bureau's EEO program, as well as the ability to properly supervise a diverse staff of employees. This includes mandatory 2-day EEO training through the EEOC Training Institute, mandatory 2-day diversity and inclusion training, a mandatory 4-day Supervisory Development Seminar (SDS), and 4 days of a mandatory Leadership Excellence Seminar (LES).

**TABLE 7:** TRAININGS FOR MANAGERS AND SUPERVISORS IN FY2015

<b>Training</b>	<b>Location</b>	<b>Date</b>
Diversity and Inclusion in the Performance Evaluation Process	Supervision Northeast	September 29, 2015
Diversity and Inclusion in the Performance Evaluation Process	Consumer Education & Engagement	September 28, 2015

<b>Training</b>	<b>Location</b>	<b>Date</b>
Diversity and Inclusion in the Performance Evaluation Process	Supervision Midwest	September 22, 2015
Diversity and Inclusion in the Performance Evaluation Process	SEFL - West Region Managers and Supervisors	August 27, 2015
Diversity and Inclusion in the Performance Evaluation Process	Legal Division Managers and Supervisors	August 5, 2015
Disability and Reasonable Accommodation Training	Open to All Managers and Supervisors	July 23, 2015
Diversity and Inclusion Leaders Training	Open to All Managers and Supervisors	Various dates
Leadership Excellence Seminars (LES)	All Managers and Supervisors	Various dates
Supervisory Development Seminars (SDS)	All Managers and Supervisors	Various dates
EEOC Training Institute 2-Day Manager Training	All Managers and Supervisors	Various dates

## Manager and employee engagement

To ensure integration of EEO into its strategic mission, the Bureau also must engage managers and all employees in the Bureau's EEO Program. In part to enhance employee engagement, CFPB in 2015 implemented a Diversity and Inclusion (D&I) Strategic Plan. The plan outlines the Agency's affirmative employment and diversity and inclusion goals and priorities, and the specific actions that will support them. From 2016 until 2020, the D&I Strategic Plan will govern D&I in the Bureau's workforce, its supplier diversity efforts, and its work to promote diversity among regulated entities. Division leadership is held accountable for D&I progress through their D&I goal in their Divisional Strategic Plans (developed in collaboration with OMWI and the Bureau's Strategy Office), and the Quarterly Performance Review (QPR) process for all Divisions managed by the Strategy Office.

OMWI recently developed the Diversity and Inclusion Council of Employees (DICE) to support involving employees and managers in compliance, affirmative employment, and diversity efforts. DICE is made up of a group of 17 employees from various demographics, pay band levels, positions, and geographic locations. DICE will work collaboratively with CFPB's existing Executive Advisory (Diversity) Council (EAC), which is composed of senior leaders, to advocate for and provide critical perspectives. It will provide a platform for employees to provide

feedback to OCR and OMWI regarding equal opportunity and diversity and inclusion efforts at CFPB, and will support affirmative employment and special emphasis programming efforts. Additionally, OCR received approval to leverage members of DICE to potentially serve as collateral duty special emphasis program managers.

Further, OCR, in collaboration with OHC, OMWI, External Affairs, and CFPB's Culture Team, has been very successful in getting employees and managers involved in Heritage Month events. For example, in FY2015, various employees and managers helped brainstorm and implement—and then attended in large numbers—the events in the below table.

**TABLE 8: HERITAGE MONTH EVENTS**

<b>Heritage Month Events</b>	<b>Date</b>
Hispanic Heritage Month - Director of Hispanic Research at PEW	October 7, 2014
Hispanic Heritage Month - HUD Secretary	October 15, 2014
Black History Month - CEO, American Express	February 24, 2015
Black History Month - U.S. Representative, Missouri 5th Congressional District	February 26, 2015
Women's History Month - CEO Citibank	April 1, 2015
Asian American & Pacific Islander Heritage Month - Principal Deputy Assistant Attorney General for U.S. DOJ, Civil Rights Division	April 30, 2015
LGBT Pride Month - Solicitor General of the United States (Discussing <i>Obergefell v. Hodges</i> , Marriage Equality Case)	September 22, 2015

Finally, during FY2015 the Bureau drafted an employee resource group (ERG) policy that is currently being finalized. ERGs at the Bureau will serve as advocates for equality and diversity and inclusion, and provide a means for employees to be active in supporting programs aligned with the Bureau's mission, such as the EEO Program. The Bureau anticipates that the ERGs will foster employee engagement throughout the Bureau by strengthening inclusion and understanding of cultural differences. ERGs also will contribute in ways that help the Bureau hire, retain, and develop its diverse workforce.

### Distributing EEO information

The Bureau is an innovative federal agency that uses various media to distribute EEO information to make sure that EEO is integrated into the agency's strategic mission and is readily accessible. The Bureau makes use of virtually all of the ideas suggested by the EEOC in its September 2014 publication entitled "Preserving Access to the Legal System: A Practical

Guide to Providing Employees with Adequate Information about Their Rights under Federal Equal Employment Opportunity (EEO) Laws and Regulations.”<sup>2</sup> The various media used to distribute information is described in the table below.

**TABLE 9: MEDIA USED TO DISTRIBUTE EEO INFORMATION**

Media Used To Distribute EEO Information
Regular email notifications via “Ops Digest” and “Manager Minute” publications
Regular email messages from the CFPB Director and OCR Director
Annual statements from the CFPB Director on the No FEAR Act and on the Bureau’s EEO Policy and Anti-Harassment Policy, provided in email format and printed format, and posted on the Bureau’s intranet
Posters posted throughout all agency facilities in break rooms and work rooms
A tri-fold brochure on EEO rights and responsibilities
Display Stands with relevant information placed near every elevator bank
Intranet and internet content, including all relevant policies and Frequently Asked Questions about OCR and discrimination-related topics
EEO-related notices on employee paystubs
Formal training including: New Employee Orientation (NEO); mandatory annual No FEAR Act and harassment prevention trainings; mandatory Supervisory Development Seminar (SDS); and mandatory 2-day manager EEO training led by the EEOC Training Institute

In-person dissemination of information is perceived by many as the most effective means to distribute EEO information. To that end, a member of OCR staff distributes a hard copy “Guide to the Office of Civil Rights” to every new Bureau employee, in person, on or near his or her very first day of employment. This guide contains detailed information on discrimination, harassment, and retaliation, and the EEO process—including the Part 1614 process and the 45-day timeframe for initiating EEO counseling. In addition, OCR conducts or sponsors numerous

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<sup>2</sup> This guidance is available at [http://www.eeoc.gov/federal/preserving\\_access.cfm](http://www.eeoc.gov/federal/preserving_access.cfm).

other in-person trainings, as well. In FY2015, live trainings containing EEO components included, for example:

- mandatory 2-day EEO Training through the EEOC Training Institute completed by 91% of supervisors and managers
- mandatory Leadership Excellence Seminars (LES) training completed by 78% of supervisors and managers
- mandatory Supervisory Development Seminar (SDS) completed by 68% of supervisors
- mandatory supervisor 2-day diversity training completed by 46% of supervisors in FY2015 and 89% of all supervisors through January 2016.
- mandatory diversity training completed by an additional 21.2% of employees in FY2015
- mandatory New Employee Orientation (NEO) completed by 185 new employees
- structured interview training completed by 50 interviewers in FY2015, adding to the 200 interviewers trained in FY2014
- mandatory performance management training for employees and supervisors completed by 88.2% of all employees
- diversity and inclusion issues in performance management training completed by over 58% of managers

Further, the Office of Civil Rights' intranet page is an excellent resource for individuals who want to access information about the EEO process. It clearly describes the process, contains links to all pertinent policies and procedures, and offers a section of plain-language Frequently Asked Questions (FAQs) that is updated and further developed by OCR staff routinely. (This section also solicits ideas for additional FAQs, encouraging those visiting the site to email OCR with suggestions for areas on which additional guidance or clarification could be helpful.) The OCR intranet page also contains contact and location information for OCR (including contact information for all OCR staff) to ensure that employees can easily seek OCR's assistance (in person or virtually).

## 5.3 Essential Element 3: Management and program accountability

### Audits of CFPB programs

One of the methods the Bureau uses to ensure management and program accountability is internal audits and assessments. The Bureau conducted or participated in internal audits in FY2015 to ascertain whether it has made a good faith effort to identify and remove barriers to equal opportunities in the workplace.

In FY2015, the Office of the Inspector General (OIG) of the Board of Governors of the Federal Reserve released its results of its audit<sup>3</sup> to assess the efficiency and effectiveness of the Bureau's EEO diversity and inclusion efforts and its EEO complaint processing program. The report, issued on March 9, 2015, states that regarding the 29 C.F.R. Part 1614 complaint process:

- “CFPB has policies and procedures for each of its employee complaint processes [e.g., EEO complaints].”
- These “processes give employees the opportunity to have their complaints heard, investigated, and redressed in a fair and equitable manner.”
- “CFPB adheres to several laws and regulations related to its OEEO [Office of Equal Employment Opportunity—OCR] and the processing of EEO complaints.”<sup>4</sup>

Since the report's issuance, CFPB has completed or made progress on all OIG recommendations including, for example, obtaining commercial software to support EEO complaint tracking and reporting requirements, mandating diversity training, creating a D&I Strategic Plan, and creating a Succession Planning and Career Pathing Guide.

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<sup>3</sup> Inspector General of the Board of Governors of the Federal Reserve System, *CFPB Can Enhance Its Diversity and Inclusion Efforts*, Report No. 2015-MO-C-002 (dated March 5, 2015) (“IG Report”).

<sup>4</sup> IG Report, at 47.

In November 2015, the minority staff of the U.S. House of Representatives Committee on Financial Services issued a report titled *The Dodd-Frank Act Five Years Later: Diversity in the Financial Services Agencies*. This report reviewed audits of 7 financial regulatory agencies including the OIG audit of CFPB discussed above. The various OIGs for financial regulatory agencies had been asked to review the agencies' internal operations to determine whether any personnel practices have created a discriminatory workplace or have otherwise systematically disadvantaged minorities and women employees, particularly from obtaining senior-management level positions. The report highlighted the number of changes CFPB has instituted to its workforce practices designed to remedy perceived past shortcomings and proactively prevent future discrimination. The report commended CFPB for evaluating its Performance Management Review (PMR) program, and determined that CFPB's willingness to hold itself accountable for achieving a non-discriminatory work environment was an "agency best practice."

As a follow-up to these audits and in line with MD-715 guidance, in FY2015, the Bureau began conducting an analysis of historical applicant data to determine whether there were any triggers that could be creating barriers in the Bureau's hiring process. The preliminary data review indicated that the CFPB was consistent with government-wide trends and there may be opportunities for improvement. OCR, OMWI, and OHC are currently working together to better understand and appropriately address the data results, and will apprise EEOC of progress.

The Bureau also conducts an Annual Employee Survey (AES) to measure employee engagement and satisfaction within the Bureau. An analysis of FY2015's results reveals that there have been improvements since FY2014's AES and that fewer items reflected challenges or issues to watch for some demographic groups, but not for others, than had been identified in the FY2014 results. For example, all race, ethnic, gender, and age groups reported an increase around the topics of "my work experience," "my work unit," "my supervisor," and "overall satisfaction." These include feeling that, "my work is important," "people in my work unit share knowledge and help each other," "my supervisor treats me with respect," and "I am satisfied with my job overall." The results also show some differences between demographic groups, which present opportunities for further enhancements, and which will be monitored by OEOF and OHC.

In FY2015, CFPB calculated and provided results for what the Office of Personnel Management (OPM) has defined as the Inclusion Quotient reflecting 20 items related to five inclusion habits: Fairness, Openness, Cooperative, Supportive and Empowering. Compared to government-wide results, CFPB's results compare quite favorably with more than 9% difference on four indices

and overall (Openness, Supportive, and Empowering) and no results with lower than government-wide favorable results. CFPB data analysts recommended that CFPB's efforts to improve the Inclusion Quotient even further would be well served by more concerted focus on employee perceptions of fairness in performance evaluation, rules, and procedures. Bureau partners in OEOF, OHC, and the Office of Strategy are continuing to analyze these results to determine if there are any triggers creating barriers for equal opportunities.

Additionally, since the fourth quarter of FY2011 (July 2011), CFPB has taken quarterly surveys of new employees. These surveys provide an innovative approach to engage in ongoing barrier analysis. The surveys are given to employees every quarter during the first year of their employment (four times in the first year), and ask questions about the employees' satisfaction with various areas of employment, including the recruitment experience, the application and hiring process, new employee orientation and training, supervision, and engagement. The surveys are then analyzed by a data expert who briefs OCR, OMWI, and OHC on a quarterly basis on the results. These results are analyzed to assess the experiences of different demographic groups of employees. At the end of the year, these results are presented in the aggregate, and allow the Bureau to monitor for any potential triggers.

Similarly, exit surveys are provided to each individual who leaves the Agency for any reason to help identify any trends and triggers related to reasons for departure. OPM provides the survey results to CFPB, and the aggregate data is compared by race, ethnicity, and gender to again facilitate the Bureau's understanding of whether (and how) the experience of different demographic groups of employees are similar or different. The aggregate data is analyzed on a quarterly and annual basis, and is compared to results from previous fiscal years, to determine whether triggers exist and further analysis is necessary to identify any potential barriers to equal employment opportunities. If any of the individual, anonymized responses indicate potential discrimination, the OCR Director is notified.

## Evaluating Managers and Supervisors

The Bureau has taken measures to ensure that managers and supervisors are evaluated on their efforts to ensure equal opportunity for all employees. These measures are included in managers' and supervisors' performance plans. Specifically, executives' performance plans evaluate their ability to "leverage diversity," and whether they foster and develop an inclusive workplace where a diverse set of talents and perspectives are valued in accomplishing the vision and mission of the Bureau. Additionally, all non-executive supervisors are evaluated on whether they are able

to grow and retain a diverse staff, support diversity and inclusion initiatives, and cooperate with EEO inquiries. The Bureau has also added a D&I competency, along with a list identifying specific behavioral indicators to evaluate, to its Leadership Competency model, and to the Non-Supervisory Employee Competency Model that addresses the importance of D&I competency for all.

The Associate Directors are also held directly accountable for their Divisions. As part of the Quarterly Performance Review (QPR) process, Associate Directors meet with the Director four times a year and report on D&I progress. This ensures awareness at the highest leadership levels, supports prompt and immediate action when issues arise, and incentivizes Associate Directors to hold their management teams accountable for successful implementation of diversity, inclusion, and EEO principles and goals.

Managers and supervisors are similarly held accountable for the work environment. When concerns have been raised with OCR, and when the OCR Director has deemed it appropriate, the OCR Director has reached out to managers and supervisors (as well as Associate Directors) to remind them of their obligations and responsibilities under applicable EEO laws, including anti-retaliation obligations. There has not been a finding of discrimination against the Bureau to date. However, the Bureau is fully ready to ensure effective compliance with any future orders in the event that the Bureau itself, the EEOC, or other authorities find discrimination at a future time.

In addition, the Bureau also holds managers and supervisors accountable for compliance with the terms of settlement agreements, and OHC similarly holds managers and supervisors responsible under the Bureau's Anti-Harassment Policy. For example, since FY2014, the Bureau decided that counselings about appropriate conduct and best practices were necessary for several managers, even though no finding was made of illegal activity or actionable misconduct.

Finally, in all trainings related to any EEO topics, managers and supervisors are reminded that equal employment opportunity—including, critically, freedom from retaliation—is essential to attracting, developing, and retaining the most qualified workforce, and that a diverse workforce and a fair workplace are essential to ensuring that the Bureau achieves its mission. This emphasizes to managers that they are responsible for the success of the EEO Program, and relatedly, to the success of the employees they supervise.

## 5.4 Essential Element 4: Proactive prevention

CFPB is committed to preventing prohibited conduct. OCR recognizes that it has an ongoing obligation to work to prevent discrimination (including harassment) on the bases of race, color, religion, sex (including pregnancy, sexual orientation, and gender identity), national origin, age, disability, genetic information, or prior protected EEO-related activity. OCR offers forward-facing assistance, including formal and informal training opportunities and day-to-day help through its open door policy, encouraging employees to reach out for guidance—in person or virtually—any time.

### Self-assessments

As discussed above, CFPB conducted or participated in several self-assessments and audits during FY2015. The following initiatives were implemented to support EEO and diversity and inclusion goals based on these audits and assessments:

- OMWI obtained approval for mandatory diversity training.
- OMWI created a multi-year D&I Strategic Plan.
- OHC created Succession and Career Pathing Guides that profiles the roles available within the Bureau and the skills required to be successful in those roles.
- OHC launched a Career Planning Framework that provides tools and resources for individual development planning.
- The Bureau launched a new Leadership Competency Model that defines expectations and requirements for leaders at all levels of the organization. The competency model is currently used for selection and learning and development of Bureau leaders. A new competency model for non-supervisory staff will be launched in FY 2016.
- OHC implemented a centralized process for learning about detail opportunities.
- OMWI developed an Employee Resource Groups (ERG) policy that will provide the framework for ERGs to contribute to Bureau operations and effectiveness.
- OMWI launched a pilot of a Mentoring Bank program that had a very positive response. (As a result, discussions are underway to expand it.)

- The Bureau continued to leverage its Executive Advisory Council (EAC), which is a cross-divisional advisory group of senior leaders who are champions for diversity. In FY2015, the EAC worked closely with OEOF to strengthen and integrate compliance, diversity, and inclusion into the CFPB's operations.
- OMWI started the application process for DICE in September 2015, and DICE members were announced in early February 2016.
- The Bureau instituted a “Workforce of the Future” initiative to support culture change, including defining expected norms around diversity and inclusion.
- OHC established and operated a joint labor-management working group, with OCR and OMWI participation, to design a new performance management program focused on employee development and coaching for use in future fiscal years.

The Bureau’s EEO Program Status Report for FY2016 will provide information about continued progress on these and other relevant Bureau initiatives.

## Policies and procedures

To help proactively prevent discrimination, the Bureau has promulgated and enforces clear and concise EEO and anti-discrimination policies and procedures. These policies detail employee rights and responsibilities under EEO laws. Managers and supervisors share the responsibility for successful implementation of these policies, and as a result, the EEO Program. The OCR Director, along with OHC, regularly review these policies and procedures to ensure that they are up-to-date, legally sufficient, well communicated, applied consistently, and implemented fairly.

For instance, the Bureau has in place an *Equal Employment Opportunity (EEO) and Non-Discrimination Policy*, which is easily accessible on the intranet and is physically given to all new employees during New Employee Orientation (NEO) training (as part of an overall “Guide to the Office of Civil Rights”), and during employee and supervisor refresher trainings. This policy clearly explains the EEO process, including how to begin the process, pertinent regulatory timeframes, and the roles and responsibilities of various offices. This policy also makes clear that discrimination, harassment, and retaliation will not be tolerated at the Bureau.

The Bureau also has in place *Procedures Related to Harassment and Inappropriate Conduct*, which sets forth the Bureau’s anti-harassment program pursuant to the *Faragher-Ellerth* line of Supreme Court cases and the EEOC’s “Enforcement Guidance on Vicarious Employer Liability

for Unlawful Harassment by Supervisors.”<sup>5</sup> These Bureau procedures clearly define harassment and inappropriate conduct, and make clear that harassment and/or inappropriate conduct will not be tolerated at CFPB. To ensure as inclusive a workplace as possible, this policy is purposefully broad and states, “Even inappropriate conduct that is not of sufficient severity to constitute harassment as a matter of law is considered misconduct.” This policy identifies a Bureau point-of-contact that should be used if an employee is subjected to or witnesses harassment. This policy provides multiple avenues of redress for claims of harassment, and does not limit employees to the EEO process. It also makes clear that retaliation is not tolerated.

The Bureau also has in place a *Reasonable Accommodation Policy*—approved by the EEOC—to ensure that applicants and employees know of their right 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. This policy also explains management’s responsibilities when a supervisor or manager is put on notice that an employee requires a reasonable accommodation. An accompanying *Standard Operating Procedures Related to Reasonable Accommodation Requests* clearly lays out the interactive process that will be used when an employee requests a reasonable accommodation for a disability. On an ongoing basis, OHC reviews disability accommodation decisions and actions to ensure that discrimination is not occurring, to confirm compliance with its written procedures, and to analyze the information tracked for trends and problems.

In FY2015, the Bureau received 31 reasonable accommodation requests. In 5 of these cases, the employee elected not to pursue the request after initially contacting OHC. The Bureau provided accommodations in less than 10 days on average, spent \$20,105.52 in reasonable accommodation equipment purchases and approximately \$350,000 for American Sign Language interpreter services, and processed all but one request within the 30-day timeframe set forth in its policy.

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<sup>5</sup> This guidance is available at <http://www.eeoc.gov/policy/docs/harassment.html>.

The OCR Director recently initiated a review of the *Reasonable Accommodation Policy* to ensure it reflects current best practices. OCR will be coordinating with stakeholders to make recommendations and update the policy as needed. Further, the OCR Director has been communicating with the Reasonable Accommodation Coordinator (RAC) to ensure that reasonable accommodation requests from applicants for employment are tracked. OCR also will be assisting in developing a standard operating procedure (SOP) to formalize and enhance, if needed, CFPB's approach to providing reasonable accommodations to applicants. The new SOP will be made available on the intranet and to recruitment and staffing officials for distribution to potential and actual applicants.

CFPB has put in place various other personnel-related policies and procedures that aid in the proactive prevention of discrimination and increase management and program accountability. Having clear and concise policies and procedures minimizes subjectivity, prevents misunderstandings about what CFPB expects from its employees and management officials, clarifies the roles and responsibilities of the various offices within the Bureau, and creates an environment and expectation of consistency in personnel decisionmaking Bureau-wide. Management officials follow the policies and procedures listed in the table below.

**TABLE 10: BUREAU POLICIES GOVERNING MAJOR PERSONNEL ISSUES AND PROGRAMS**

Bureau Policies Governing Major Personnel Issues and Programs
Hiring, Promotion, and Internal Personnel Movements Policy
Attorney Hiring and Promotion Policy
Performance Management Program Policy
Disciplinary and Adverse Action Policy
Alternative Dispute Resolution Policy
Open Door and Administrative Grievance Policy

In addition to formal policies, several other tools exist to assist with evenhanded implementation of personnel-related matters including, for example, a Hiring Manager's Guide, recruitment-related resources, career planning resources, and procedures for documenting declining performance.

## 5.5 Essential Element 5: Efficiency

CFPB continuously evaluates its EEO complaint resolution process to ensure it is efficient, fair, and impartial.

### Neutrality

OCR emphasizes—and guards—its neutrality and impartiality, which is critical to having an efficient and fair EEO complaint resolution process. This ensures that employees and managers know that the pre-complaint phase and the investigation stage are not adversarial processes, that OCR will provide a neutral and impartial factual record, and that, when requested, OCR will issue a final decision assessing the facts and law to determine whether or not illegal conduct occurred.

The CFPB's Director has granted the OCR Director full authority to carry out the Part 1614 functions of OCR without Legal Division (i.e., General Counsel) control or intrusion, thus ensuring impartiality and removing any possible conflict of interest. Legal resources within OCR make this possible by internally conducting legal sufficiency reviews of EEO matters, including issuing accept/dissmiss decisions, Reports of Investigations (ROIs), and Final Agency Decisions (FADs). The Legal Division, which defends the Bureau in these matters, is firewalled from all activities within OCR and only participates during adversarial portions of the EEO process (hearings and appeals), and during settlement negotiations. All other Bureau offices are similarly firewalled and kept separate to avoid conflicting or competing interests.

### EEO Counselings and investigations

OCR works to ensure that its counselings and investigations are done within the regulatory timeframes, and that the EEO counselor's report and ROI are created with a high standard of quality and fairness to both parties. In FY2015, OCR completed all counselings and mediations within the prescribed regulatory timeframes. Further, when a settlement agreement was reached, OCR worked with program offices to ensure timely compliance. In the event of a finding of discrimination from the agency itself or from the EEOC (or other adjudicatory authority), OCR will work to ensure timely compliance with the decision.

By conducting EEO counseling, mediation, and investigation services through qualified third-party contractors from the GSA Schedule, CFPB provides a fair and effective dispute resolution system in accordance with 29 C.F.R. Part 1614. All contractors meet the 32 hours of training

and eight hours of refresher training requirements set by the EEOC's Management Directive-110, and OCR seeks to hold contractors accountable for counseling and investigation processing timeframes. As complaint volume stabilizes and continues to decrease to align with government-wide trends per capita and once OCR infrastructure is fully in place, OCR will be in a better position to conduct a greater percentage of EEO counselings using OCR employees. In the meantime, OCR already is assessing alternative contract investigator and in-house staffing models to streamline processes and create greater efficiencies.

### Alternative Dispute Resolution (ADR) program

The Bureau has in place an ADR Policy, and OCR provides additional information about the benefits of ADR on the intranet. These materials explain the ADR process, why employees should consider ADR, the different types of ADR, and how an employee can request ADR. The Bureau's ADR Policy makes clear that although ADR is voluntary for EEO filers, supervisors and managers must participate in good faith if a filer elects ADR. The goals in having this strong ADR policy include resolving conflicts at an early stage, improving workplace communication and morale, and creating a more efficient EEO Program.

OCR offers ADR during the pre-complaint and formal complaint stages of the EEO process, including while cases are pending before the EEOC for hearing or on appeal. The Bureau also offers mediation on an ad hoc basis for non-EEO workplace disputes through OHC, under its Open Door and Administrative Grievance policy, and through its negotiated grievance process. During FY2015, OCR scheduled approximately 12 mediations.

OCR is in the process of updating, to the extent needed, its ADR Policy to ensure that it complies with the clarified standards in the revised EEOC Management Directive 110 (MD-110) (effective August 5, 2015). Consistent with the revised MD-110, the Legal Division — not the responsible management official directly involved in the dispute — has settlement authority for EEO cases at the administrative level, including during EEO counseling. OCR previously reported settlement authority as a program deficiency, having answered "no" to the question on the MD-715 Self-Assessment Checklist (which seeks "yes" answers) asking "Does the responsible management official directly involved in the dispute have settlement authority?" In light of the revised MD-110 guidance, Chapter 3, Section III.A.9 (clarifying that "no responsible management official or agency official directly involved in the case will serve as the person with settlement authority"), CFPB's current approach should no longer be considered a program deficiency. OCR, however, continues to assess internal data related to the success of the ADR program, including resolution

rates, and is collecting information about best practices and benchmarks related to a recommendation for settlement authority protocols to create a structure that may help better support openness and willingness to employ creative and early resolution options.

### **Complaint and workforce tracking and monitoring systems**

In FY2015, OCR received approval to obtain a vendor-supported software system that allows it to track and analyze EEO complaint data. iComplaints is a web-based EEO case management solution that provides a broad range of capabilities for reporting (including No FEAR Act and Form 462), processing, tracking, and managing the overall effectiveness of the CFPB's EEO Program. Once the change management process to iComplaints is complete in FY2016/2017, this software will allow OCR to more efficiently comply with EEOC regulations and reporting obligations, identify and monitor internal EEO trends, and redirect staff time away from manual tracking and reviewing complaints data and towards work on other mission-critical projects.

The Bureau also has in place various data systems that allow for periodic examinations of the CFPB's workforce profiles by demographic characteristics. These systems maintain accurate information on the race, national origin, sex, and disability status of Bureau employees. Further, these systems allow OHC and OEOF to monitor the data to determine whether triggers may exist that could lead to barriers for equal employment opportunities.

Finally, OMWI and OHC track the Bureau's recruitment efforts so that future data analysis on whether recruitment programs are creating barriers to equal opportunity may occur. CFPB also uses information it obtains from OPM's USAJobs.gov (as supported by Monster) to obtain applicant flow data. In FY2015, after expiration of a statutory hiring exemption set forth in the Dodd-Frank Act, CFPB began to collect applicant data for executive positions.

## **5.6 Essential Element 6: Responsiveness and legal compliance**

CFPB is committed to ensuring full compliance with the law and incorporating EEO best practices into its everyday business. OCR staff is tasked with monitoring and complying with all orders and directives by EEOC Administrative Judges and the EEOC's Office of Federal Operations.

The OCR Director's performance standards require compliance with EEOC orders. OCR staff is also responsible for compliance with EEOC orders, and has received formal training in EEO compliance. There have been no findings of discrimination against CFPB to date. However, OCR is fully ready to ensure effective compliance in the event of an order finding discrimination from the Bureau itself, the EEOC, the Merit Systems Protection Board, the Office of Special Counsel, labor arbitrators, the Federal Labor Relations Authority, the Department of Labor, or a federal court. The Bureau is ready to hold management officials accountable for discrimination—including harassment or retaliation—where applicable, and to ensure that they cooperate with the EEO process.

The Bureau has also complied with regulatory requirements to submit an annual Form 462 Report, EEOC MD-715 Report, the Federal Equal Opportunity Recruitment Program (FEORP) Report, the Disabled Veterans Affirmative Action Program (DVAAP) Report, and quarterly and annual No FEAR Act reports.

## 6. Summary of work force profiles

The workforce profile data represents the demographics of the CFPB workforce by race, sex, and disability and was retrieved from CFPB database systems. The data is based on information as of September 30, 2015.

The total CFPB workforce is 1,527 employees, including 1,389 permanent employees and 138 temporary employees. The total workforce grew by 100 employees during FY2015, representing a rate of change of 7.01 percent.

White men, followed by White women, comprise the largest racial groups in CFPB, followed by Black men and women.

During FY2015, all EEO group populations experienced net growth with the exception of males and females of two or more races, Native Hawaiian males and females, and Asian males.

Compared to the 2010 U.S. Census Civilian National Labor Force (CLF), overall CFPB demographics have not changed significantly since FY2014.

As a result of CFPB's Special Program Plan for the Recruitment, Hiring and Advancement of Individuals with Targeted Disabilities (see also Part J), there was a growth of 11 new employees with reportable disabilities from the beginning of FY2015 to the close of FY2015, representing a net change of 9.17 percent, which exceeds the rate of change for the total workforce.

In January 2016, the disABLED Magazine, a magazine targeted to the recruitment of persons with disabilities, named the Bureau the 13th Best Federal Agency Employer for persons with disabilities.

## 7. Workplace analysis

Specific information follows.

TABLE 11: TOTAL WORKFORCE – FY2014

	ALL	Hispanic	White	Black	Asian	NH/OPI	AI/AN	Two or More
ALL	1,419	79	921	254	142	2	10	11
%		5.57%	64.9%	17.9%	10.01%	0.14%	0.7%	0.77%
CLF		9.96%	72.36%	12.02%	3.9%	0.14%	1.08%	0.54%
Male	761	37	539	96	77	0	7	5
Female	658	42	382	158	65	2	3	6

TABLE 12: TOTAL WORKFORCE – FY2015

	ALL	Hispanic	White	Black	Asian	NH/OPI	AI/AN	Two or More
ALL	1,527	91	985	285	142	2	12	10
%		5.96%	64.51%	18.66%	9.3%	0.13%	0.78%	0.65%
CLF		9.96%	72.36%	12.02%	3.9%	0.14%	1.08%	0.54%
Male	803	48	561	110	72	0	8	4
Female	724	43	424	175	70	2	4	6

**TABLE 13: TOTAL WORKFORCE – FY2014 COMPARED TO FY2015**

	<b>ALL</b>	<b>Hispanic</b>	<b>White</b>	<b>Black</b>	<b>Asian</b>	<b>NH/OPI</b>	<b>AI/AN</b>	<b>Two or More</b>
Difference	+108	+12	+64	+31	+0	0	+2	-1
Male	+42	+11	+22	+134	-5	0	1	0
Female	+66	+1	+42	+17	+5	0	+1	0
<b>Ratio Change</b>								
Male	-1.04%	0.54%	-1.25%	0.44%	-0.71%	0.00%	0.03%	-0.09%
Female	1.04%	-0.14%	0.85%	0.33%	0.00%	-0.01%	0.05%	-0.03%
Net Change	7.61%							
Male	5.52%	29.73%	4.08%	13.99%	-6.49%	0.00%	14.29%	0.00%
Female	10.03%	2.38%	10.99%	10.76%	7.69%	0.00%	33.33%	0.00%

At the close of FY2015, CFPB employed a total of 1,527 employees—1,389 permanent employees and 138 temporary employees. This was a significant decrease in temporary employees from 232 (16% of the total workforce in FY2014) to 138 (9.04% of the total workforce in FY2015). The number of permanent employees increased by 197 (12.90 % of the total workforce in FY2015).

Males comprised 730 or 52.56% of the permanent workforce—slightly higher when compared to the CLF availability of 51.86%. Females comprised 659 or 47.44% of the permanent workforce, as compared to 48.14% of the CLF.

## 7.1 Permanent workforce: participation of class grouping

TABLE 14: WORKFORCE (ALL)

Group	Total number FY2015	Percentage	Total number FY2014	Percentage	Net change	CLF
White Male	503	36.21%	440	36.91%	14.32%	38.33%
White Female	381	27.43%	318	26.68%	19.81%	34.03%
Black Male	105	7.56%	88	7.38%	19.32%	5.49%
Black Female	165	11.88%	143	12%	15.38%	6.53%
Hispanic Male	43	3.10%	31	2.60%	38.71%	5.17%
Hispanic Female	38	2.74%	36	3.02%	5.56%	4.79%
Asian Male	67	4.82%	58	4.87%	15.52%	1.97%
Asian Female	64	4.61%	57	4.78%	12.28%	1.93%
NH/PI Male	0	0.00%	0	0.00%	0.00%	0.07%
NH/PI Female	2	0.14%	2	0.17%	0.00%	0.07%
AI/AN Male	8	0.58%	7	0.59%	14.29%	0.55%
AI/AN Female	3	0.22%	3	0.25%	0.00%	0.53%
2 or More Male	4	0.29%	3	0.25%	33.33%	0.26%
2 or More Female	6	0.43%	6	0.50%	0.00%	0.28%

White females are employed at CFPB at a rate of 27.43% (381), which is below the CLF of 34.03%. Hispanic males are employed at a rate of 3.10% (43) and Hispanic females at 2.74% (38), which are slight improvements over the FY2014 employment rates but still below the CLF of 5.17% and 4.79%, respectively. American Indian/Alaska Native males are employed at 0.58% (8) and females at 0.22% (3), which was above the CLF rate for males (0.55%), but below the CLF for females (0.53%). Males who are two or more races were reported at 0.29% (4), slightly below the CLF of 0.26%, and females at 0.43% (6), above the CLF rate of 0.28%.

Asian males are employed at a rate of 4.82% (67) and Asian females at 4.61% (64), which were significantly above the CLF of 1.97% and 1.93% respectively. CFPB employed Black males at a rate of 7.56% (105) and Black females at 11.88% (165), which were above the CLF of 5.49% and 6.53%, respectively.

## 7.2 Temporary workforce: participation of class grouping

TABLE 15: TEMPORARY WORKFORCE

Group	Total number FY2015	Percentage	Total number FY2014	Percentage	Net change	CLF
White Male	58	42.03%	101	42.98%	-42.57%	38.33%
White Female	43	31.16%	66	28.09%	-34.85%	34.03%
Black Male	5	3.62%	9	3.83%	-44.44%	5.49%
Black Female	10	7.25%	17	7.23%	-41.18%	6.53%
Hispanic Male	5	3.62%	7	2.98%	-28.57%	5.17%
Hispanic Female	5	3.62%	6	2.55%	-16.67%	4.79%
Asian Male	5	3.62%	20	8.51%	-75.00%	1.97%
Asian Female	6	4.35%	8	3.40%	0.00%	1.93%
NH/PI Male	0	0.00%	0	0.00%	0.00%	0.07%
NH/PI Female	0	0.00%	0	0.00%	0.00%	0.07%
AI/AN Male	0	0.00%	0	0.00%	0.00%	0.55%
AI/AN Female	1	0.72%	0	0.00%	100.00%	0.53%
2 or More Male	0	0.00%	1	0.43%	-100%	0.26%
2 or More Female	0	0.00%	0	0.00%	-0.00%	0.28%

As noted earlier, there was a significant decrease in temporary employees from 232 (16% of the total workforce in FY2014) to 138 (9% of the total workforce in FY2015). At the end of FY2015,

there were no Native Hawaiian/Pacific Islander males or females and no American Indian/Alaska Native males in the temporary workforce. There were also no males or females of two or more races in the temporary workforce. With the exception of American Indian/Alaska Native females, with an increase of 100%, all other groups saw net losses in participation rates. Asian males' net change of -75.00% (from 20 to 5 employees) and males of two or more races' net change of -100% (from 1 to 0 employees) were the highest net changes areas for CFPB. The net changes for White males, Black males and Black females were close behind at -42.57, -44.44 and -41.18, respectively.

## 7.3 Analysis of senior pay bands by grouping (permanent employees)

White males and females, Black males and females, Hispanic males and females, and Asian males and females are represented in all senior bands CN-53 to CN-81/82/90.

Native Hawaiian/Pacific Islander males are not represented in any senior bands CN-53 to CN-81/82/90 and Native Hawaiian/Pacific Islander females are represented only in senior band CN-60.

American Indian/Alaska Native males are represented in senior band CN-53 and CN-60 only. American Indian/Alaska Native females are represented in senior bands CN-60 and CN-71.

Males and females of two or more races are represented at senior bands CN-53 and CN-60, and CN-60 and CN-71, respectively.

**TABLE 16:** SENIOR PAY BANDS BY GENDER

	<b>Male</b>	<b>Female</b>
GS-13/CN-53	143	118
	54.79%	45.21%
GS-14/CN-60	168	168
	50.00%	50.00%
GS-15/CN-71	125	116

	51.87%	48.13%
CN-81/82/90	26	18
	59.09%	40.91%

TABLE 17: SENIOR PAY BANDS BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
GS-13/ CN-53	97	70	23	30	8	5	11	13	0	0	3	0	1	0
%	37.16 %	26.82 %	8.81 %	11.49 %	3.07 %	1.92 %	4.21 %	4.98 %	0.00 %	0.00 %	1.15 %	0.00 %	0.38 %	0.00 %
GS-14/ CN-60	122	111	18	27	8	8	17	19	0	1	1	1	2	1
%	36.31 %	33.04 %	5.36 %	8.04%	2.38 %	2.38 %	5.06 %	5.65 %	0.00 %	0.30 %	0.30 %	0.30 %	0.60 %	0.30 %
GS-15/ CN-71	103	80	10	16	5	5	7	12	0	0	0	1	0	2
%	42.74 %	33.20 %	4.15 %	6.64%	2.07 %	2.07 %	2.90 %	4.98 %	0.00 %	0.00 %	0.00 %	0.41 %	0.00 %	0.83 %
CN-81/82/ 90	17	14	2	2	3	1	4	1	0	0	0	0	0	0
%	38.64 %	31.82 %	4.55 %	4.55%	6.82 %	2.27 %	9.09 %	2.27 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %

## 7.4 New hires: permanent

Permanent new hires for FY2015 consisted of 84 females (49.70%), which is higher than the CLF availability of 48.14%. However, White females were 27.06% (46) of the new hires, which is lower than the 34.03% CLF availability. Black females were 14.12% (24) of the new hires, which is above the 6.53% CLF availability and Black males were 7.65% (13) of the new hires, which is also above the 5.49% CLF availability. Hispanic females and Hispanic males were 1.76% (3) and 2.94 (5), respectively, of the new hires, which is lower than the respective 4.79% and 5.17% CLF

availability. Asian females and Asian males were 5.92% (10) and 1.78 percent (3), respectively, of the new hires, which is below the respective 1.93% and 1.97% CLF availability. Native Hawaiian/Pacific Islander females and males were 0.00% (0) of the new hires, which is lower than the 0.07% CLF availability. American Indian/Alaska Native males were 0.59% (1) of the new hires, which is above the 0.55% CLF availability. American Indian/Alaska Native females were 0.59% (1) of the new hires, which is slightly above the 0.53% CLF availability. Females of two or more races were 0.59% (1) of the new hires, which is above 0.26% CLF availability. Males who are two or more races were not in the permanent hires for FY2015.

**TABLE 18:** NEW PERMANENT HIRES BY GENDER

	<b>Male</b>	<b>Female</b>
Number	85	84
Percent	50.30%	49.70%
CLF	51.86%	48.14%

**TABLE 19:** NEW PERMANENT HIRES BY GROUPING

	<b>WM</b>	<b>WF</b>	<b>BM</b>	<b>BF</b>	<b>HM</b>	<b>HF</b>	<b>AM</b>	<b>AF</b>	<b>NH/ PI M</b>	<b>NH/ PI F</b>	<b>AI/A N M</b>	<b>AI/A N F</b>	<b>2+M</b>	<b>2+F</b>
#	63	46	13	24	5	3	3	10	0	0	1	0	0	1
%	37.28 %	27.22 %	7.69 %	14.20 %	2.96 %	1.78 %	1.78 %	5.92 %	0.00 %	0.00 %	0.59 %	0.00 %	0.00 %	0.59 %
CLF	38.33 %	34.03 %	5.49 %	6.53%	5.17 %	4.79 %	1.97 %	1.93 %	0.07 %	0.07 %	0.55 %	0.53 %	0.26 %	0.26 %

## 7.5 New hires: temporary

Temporary hires for FY2015 consisted of 66 (52.38%) females, which is higher than the CLF availability of 48.14%. White females consisted of 47 or 37.30% of the temporary hires, which is higher than the CLF availability of 34.03%. Black males consisted of 7 or 5.56% of the temporary hires, which is slightly above the CLF availability of 5.49%. Hispanic males made up 4.76% (6) of the temporary hires and Hispanic females consisted of 3.17% (4), which are both lower than the CLF availability of 5.17% and 4.79%. Asian males made up 2.38% (3) of the temporary hires

and the females comprised 4.76% (6), both above the CLF availability of 1.97% and 1.93%, respectively. Native Hawaiian/Pacific Islander males and females, American Indian/Alaska Native males, and males and females of Two or More Races were not in the temporary hires for FY2015. American Indian/Alaska Native females made up .79% (1) of the temporary hires, above the CLF availability of 0.53%.

**TABLE 20:** NEW TEMPORARY HIRES BY GENDER

	<b>Male</b>	<b>Female</b>
<b>Number</b>	60	66
<b>Percent</b>	47.62%	52.38%
<b>CLF</b>	51.86%	48.14%

**TABLE 21:** NEW TEMPORARY HIRES BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	44	47	7	8	6	4	3	6	0	0	0	1	0	0
%	34.92	37.30	5.56	6.35%	4.76	3.17	2.38	4.76	0.00	0.00	0.00	0.79	0.00	0.00
CLF	38.33	34.03	5.49	6.53%	5.17	4.79	1.97	1.93	0.07	0.07	0.55	0.53	0.26	0.26

## 7.6 New hires by mission critical occupations

CFPB has four key occupational groups that are instrumental and deemed “mission critical” to perform the mission of the Bureau.

### 7.6.1 Examiner (0570)

During FY2015, CFPB employed 418 examiners (0570 Series): 278 (66.51%) males and 140 (33.49%) females.

- 178 or 42.58% White males
- 82 or 19.62% White females
- 56 or 13.40% Black males
- 33 or 7.89% Black females
- 17 or 4.07% Hispanic males
- 9 or 2.15% Hispanic females
- 22 or 5.26 % Asian males
- 12 or 2.87% Asian females
- 1 or .24% Native Hawaiian or Other Pacific Islander female
- 5 or 1.20% American Indian/Alaskan Native males
- 1 or 0.24% American Indian/Alaskan Native females
- 2 or 0.48% Females of Two or more races

**TABLE 22:** NEW EXAMINERS BY GENDER

	<b>Male</b>	<b>Female</b>
Number	278	140
Percent	66.51%	33.49%
CLF	54.70%	45.30%

**TABLE 23:** NEW EXAMINERS BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	178	82	56	33	17	9	22	12	0	1	5	1	0	2

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
%	42.58 %	19.62 %	13.4 0%	7.89%	4.07 %	2.15 %	5.26 %	2.87 %	0.00 %	0.24 %	1.20 %	0.24 %	0.00 %	0.48 %
CLF	44.10 %	28.30 %	3.60 %	8.70%	3.10 %	3.70 %	3.70 %	4%	0.00 %	0.00 %	0.10 %	0.30 %	0.20 %	0.30 %

## 7.6.2 General attorney (0905)

During FY2015, CFPB employed 286 employees in the General Attorney Program (0905 series) occupations; 47.20% (135) males and 52.80% (151) females:

- White males (112) comprised 39.16% of the hires
- White females (109) comprised 38.11% of the hires
- Black males (8) comprised 2.80% of the hires
- Black females (16) comprised 5.59% of the hires
- Hispanic males (5) comprised of 1.75% of the hires
- Hispanic females (7) comprised 2.45% of the hires
- Asian males (8) comprised 2.80% of the hires
- Asian females (16) comprised 5.59% of the hires
- American Indian or Alaska Native female (1) comprised .35% of the hires
- American Indian or Alaska Native male (1) comprised .35% of the hires
- Males of two or more races (1) comprised 0.35% of the hires
- Females of two or more races (2) comprised 0.70% of the hires

TABLE 24: NEW GENERAL ATTORNEYS BY GENDER

Male	Female
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	Male	Female
Number	135	151
Percent	47.20%	52.80%
CLF	66.70%	33.30%

**TABLE 25:** NEW GENERAL ATTORNEYS BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	112	109	8	16	5	7	8	16	0	0	1	1	1	2
%	39.16 %	38.11 %	2.80 %	5.59%	1.75 %	2.45 %	2.80 %	5.59 %	0.00 %	0.0%	0.35 %	0.35 %	0.35 %	0.70 %
CLF	59.70 %	26.70 %	2.10 %	2.60%	2.50 %	1.80 %	1.80 %	1.80 %	0.00 %	0.00 %	0.30 %	0.20 %	0.20 %	0.20 %

### 7.6.3 Economist (0110)

During FY2015, CFPB employed 40 employees in the Economists (0110 series) occupations; 37.50% (15) females and 62.50% (25) males:

- White males (21) comprised 52.50% of the hires
- White females (5) comprised 12.50% of the hires
- Black females (2) comprised 5.0% of the hires
- Black males (1) comprised 2.50% of the hires
- Hispanic males (1) comprised 2.5% of the hires
- Asian males (2) comprised 5.0% of the hires
- Asian females (8) comprised 20% of the hires

**TABLE 26:** NEW ECONOMISTS BY GENDER

	<b>Male</b>	<b>Female</b>
Number	25	15
Percent	62.50%	37.50%
CLF	67.1%	32.9%

**TABLE 27:** NEW ECONOMIST BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	21	5	1	2	1	0	2	8	0	0	0	0	0	0
%	52.50	12.50	2.50	5.00%	2.5%	0.00	5.00	20.0	0.00	0.00	0.00	0.00	0.00	0.00
%	%	%	%	%	%	%	%	%	%	%	%	%	%	%
CLF	55.8%	25.2%	2.8%	2.7%	3.3%	1.80	4.4%	2.7%	0.00	0.10	0.20	0.10	0.40	0.40

#### 7.6.4 Miscellaneous administration and program (0301)

During FY2015, CFPB employed 305 employees in the Miscellaneous Administration and Program (0301 series) occupations; 47.21% (144) males and 52.79% (161) females:

- White males (94) comprised 30.82% of the hires
- White females (84) comprised 27.54% of the hires
- Black males (23) comprised 7.54% of the hires
- Black females (51) comprised 16.72% of the hires
- Hispanic males (7) comprised 2.30% of the hires
- Hispanic females (10) comprised 3.28% of the hires
- Asian males (19) comprised 6.23% of the hires
- Asian females (13) comprised 4.26% of the hires

- Native Hawaiian or Pacific Islander females (1) comprised 0.33% of the hires
- American Indian or Alaska Native females (1) comprised 0.33% of the hires
- American Indian or Alaska Native males (1) comprised 0.33% of the hires
- Females of two or more races (1) comprised 0.33% of the hires

**TABLE 28:** NEW MISC. ADMINISTRATION BY GENDER

	<b>Male</b>	<b>Female</b>
Number	144	161
Percent	47.21%	52.79%
CLF	36.7%	63.3%

**TABLE 29:** NEW MISC. ADMINISTRATION BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	94	84	23	51	7	10	19	13	0	1	1	1	0	1
%	30.82 %	27.54 %	7.54 %	16.72 %	2.30 %	3.28 %	6.23 %	4.26 %	0.00 %	0.33 %	0.33 %	0.33 %	0.00 %	0.33 %
CLF	27.1%	43.8%	3.6%	8.8%	2.8%	5.80 %	2.4%	3.2%	0.00 %	0.10 %	0.20 %	0.40 %	0.40 %	0.70 %

## 7.7 Non-competitive promotion eligibility

Throughout FY2015, 312 employees were eligible for career ladder promotions; 187 are males and 125 are females. Of the 312 who were eligible for career ladder promotions, 308 received the promotion within 1 to 12 months' time in band, 1 received the promotion within 12-24 months, and 2 received the promotion in 25+ months. Of those who were eligible for promotion in FY2015:

- 127 or 40.71% White males

- 61 or 19.55% White females
- 30 or 9.62% Black males
- 38 or 12.81% Black females
- 12 or 3.85% Hispanic males
- 13 or 4.17% Hispanic females
- 16 or 5.13% Asian males
- 11 or 3.53% Asian females
- 1 or 0.32% American Indian males
- 1 or 0.32% American Indian females
- 1 or 0.32% Two or more races males
- 1 or 0.32% Two or more races females

Of the 312 employees eligible to receive a career ladder promotion, 1 did not receive a career ladder promotion: 1 or 100% White female.

**TABLE 30:** NON-COMPETITIVE PROMOTIONS BY GENDER

	<b>Male</b>	<b>Female</b>
Eligible for Promotions	187	125
Percent (of those eligible)	59.94%	40.06%
Did Not Receive	0	1
Percent (of those not receiving)	0.00%	100%

**TABLE 31:** NON-COMPETITIVE PROMOTIONS BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	127	61	30	38	12	13	16	11	0	0	1	1	1	1
%	40.71 %	19.55 %	9.62 %	12.18 %	3.85 %	4.17 %	5.13 %	3.53 %	0.00 %	0.00 %	0.32 %	0.32 %	0.32 %	0.32 %
CLF	0	1	0	0	0	0	0	0	0	0	0	0	0	0

## 7.8 Separations

### 7.8.1 Total separations

A total of 104 permanent employees were separated during FY2015; 58 or 55.77% are males and 46 or 44.23% are females. Separations include resignations, terminations, transfers, and retirements. White males at 43 (or 41.35%) was the largest group separated. Other rates of separation include:

- White females-22 or 21.15%
- Black males–2 or 1.92%
- Black females–11 or 10.58%
- Hispanic males–2 or 1.92%
- Hispanic females–3 or 2.88%
- Asian males–11 or 10.58%
- Asian females–9 or 8.65%
- Two or more races females–1 or 0.96%

TABLE 32: TOTAL SEPARATIONS BY GENDER

	Male	Female
Number	58	46

	<b>Male</b>	<b>Female</b>
Percent	55.77%	44.23%

**TABLE 33:** TOTAL SEPARATIONS BY GROUPING

	<b>WM</b>	<b>WF</b>	<b>BM</b>	<b>BF</b>	<b>HM</b>	<b>HF</b>	<b>AM</b>	<b>AF</b>	<b>NH/ PI M</b>	<b>NH/ PI F</b>	<b>AI/A N M</b>	<b>AI/A N F</b>	<b>2+M</b>	<b>2+F</b>
#	43	22	2	11	2	3	11	9	0	0	0	0	0	1
%	41.35 %	21.15 %	1.92 %	10.58 %	1.92 %	2.88 %	10.5 8%	8.65 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.96 %

## 7.8.2 Resignations

Of the 104 separations, 100 were resignations, the largest group of whom are White males (41) at 41.00%. Other resignation rates include:

- 22 or 22.00% White females
- 1 or 1.00% Black males
- 10 or 10.00% Black females
- 2 or 2.00% Hispanic males
- 3 or 3.00% Hispanic females
- 11 or 11.00% Asian males
- 9 or 9.00% Asian females
- 1 or 1.00% Two or more races females

**TABLE 34:** RESIGNATIONS BY GENDER

	<b>Male</b>	<b>Female</b>
Number	55	45

	Male	Female
Percent	55 %	45%

TABLE 35: RESIGNATIONS BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	41	22	1	10	2	3	11	9	0	0	0	0	0	1
%	41.00 %	22.00 %	1.00 %	10.00 %	2.00 %	3.00 %	11.00 %	9.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	1.00 %

### 7.8.3 Terminations

There were 4 terminations: two White males, one Black female and one Black male.

TABLE 36: TERMINATIONS BY GENDER

	Male	Female
Number	3	1
Percent	75%	25%

TABLE 37: TERMINATIONS BY GROUPING

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	2	0	1	1	0	0	0	0	0	0	0	0	0	0
%	50% 0.0%	25% 25%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%	0.0% 0.0%

### 7.8.4 Transfers To Another Federal Agency

There were 36 transfers: 11 White males (30.56%), 7 White females (19.44%), 1 Black male (2.78%), 7 Black females (19.44%), 1 Hispanic female (2.78%), 3 Asian male (8.33%), and 6 Asian females (16.67%).

**TABLE 38:** TRANSFERS BY GENDER

	<b>Male</b>	<b>Female</b>
Number	15	21
Percent	41.67%	58.33%

**TABLE 39:** TRANSFERS BY GROUPING

	<b>WM</b>	<b>WF</b>	<b>BM</b>	<b>BF</b>	<b>HM</b>	<b>HF</b>	<b>AM</b>	<b>AF</b>	<b>NH/ PI M</b>	<b>NH/ PI F</b>	<b>AI/A N M</b>	<b>AI/A N F</b>	<b>2+M</b>	<b>2+F</b>
#	11	7	1	7	0	1	3	6	0	0	0	0	0	0
%	30.56 %	19.44 %	2.78 %	19.44 %	0.00 %	2.78 %	8.33 %	16.6 7%	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %

## 7.8.5 Retirements

During FY2015, there were 9 retirements: 7 males (77.78%) and 2 females (22.22%). Of the 9 retirements, 5 are White males (55.56%), 1 is a Hispanic male (11.11%), 2 are Black females (22.22%), and 1 is a male of Two or more races (11.11%).

**TABLE 40:** RETIREMENTS BY GENDER

	<b>Male</b>	<b>Female</b>
Number	7	2
Percent	77.78%	22.22%

**TABLE 41:** RETIREMENTS BY GROUPING

	<b>WM</b>	<b>WF</b>	<b>BM</b>	<b>BF</b>	<b>HM</b>	<b>HF</b>	<b>AM</b>	<b>AF</b>	<b>NH/ PI M</b>	<b>NH/ PI F</b>	<b>AI/A N M</b>	<b>AI/A N F</b>	<b>2+M</b>	<b>2+F</b>	
#	5	0	0	2	1	0	0	0	0	0	0	0	0	1	0
%	55.56 %	0.00%	0.00 %	22.22 %	11.1 1%	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	11.1 1%	0.00 %

## 7.9 Awards

In FY2015, CFPB granted 1,113 monetary awards to its permanent workforce of 1389 employees as part of the pay-for-performance program: 588 (52.83%) to male employees and 525 (47.17%) to female employees. Award amounts were determined by a pre-set, standard percentage of employees' salaries. The distribution of the awards to groups was as follows:

- White males (412) received 37.02% of the awards.
- White females (302) received 27.13% of the awards.
- Black males (86) received 7.73% of the awards.
- Black females (129) received 11.59% of the awards.
- Hispanic males (29) received 2.68% of the awards.
- Hispanic females (32) received 2.61% of the awards.
- Asian males (54) received 4.85% of the awards.
- Asian females (55) received 4.90% of the awards.
- Native Hawaiian / Pacific Islander females (1) received 0.09% of the awards.
- American Indian / Alaska Native males (6) received 0.54% of the awards.
- American Indian / Alaska Native females (3) received 0.27% of the awards.
- Two or more races males (1) received 0.09% of the awards.
- Two or more races females (4) received 0.36% of the awards.

TABLE 42: AWARDS BY GENDER

	Male	Female
Number	588	525
Percent	52.83%	47.17%

**TABLE 43: AWARDS BY GROUPING**

	WM	WF	BM	BF	HM	HF	AM	AF	NH/ PI M	NH/ PI F	AI/A N M	AI/A N F	2+M	2+F
#	412	302	86	129	29	32	54	55	0	1	6	3	1	4
%	37.02 %	27.13 %	7.73 %	11.59 %	2.68 %	2.61 %	4.72 85%	4.90 %	0.00 %	0.09 %	0.54 %	0.27 %	0.09 %	0.36 %

### Summary of EEO plan objectives to eliminate barriers or correct deficiencies

For its FY2015 Plan update, CFPB has developed action plans to eliminate possible barriers in hiring as summarized below and set forth fully in Part I.

CFPB will analyze hiring processes to reveal and eliminate impediments to certain minority applicants proceeding further in the application process. Recruiting, hiring, and retaining diverse employees should also help to improve the participation of minorities. (*See also* Part I-1 for more detail.)

## **8. Certification of establishment of continuing equal employment opportunity programs**

I, Stuart Ishimaru, Director, Office of Equal Opportunity and Fairness, along with the Director of the Office of Civil Rights, am a Principal EEO Official for the Consumer Financial Protection Bureau.

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure, or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.



2/19/16

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**Signature of Principal EEO Official**

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**Date**

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.



2/19/16

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**Signature of Agency Head**

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**Date**

## **9. EEO program status report**

CFPB conducted the mandatory self-assessment of its EEO Program by completing the Self-Assessment Checklist. CFPB will retain the checklist and supporting documentation and data, and make it available upon request by the EEOC.

## 10. EEO plan for attaining the essential elements of model EEO program

TABLE 44: EEOC PART H-1

EEOC Form 715-01 Part H-1	U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report
Consumer Financial Protection Bureau	FY2015
Statement of model program essential element deficiency	CFPB has previously reported as a deficiency that is has not yet established Special Emphasis Programs (SEP) (e.g., Federal Women's Program, Hispanic Employment Program, People with Disabilities Program Manager) or a Selective Placement Program (SPP).
Objective	CFPB has made great progress in this area and has people in place who perform the functions of SEP Manager. DICE members may serve as collateral duty special emphasis program managers and OCR will monitor this arrangement to ensure it complies with the relevant regulations. CFPB no longer believes that this is a deficiency, but will list it here as we plan to analyze the success of the program in FY2016.
Responsible official	OCR Director, OMWI Director, Chief Human Capital Officer
Date objective initiative	April 30, 2013
Target date for completion of objective	January 2016
Planned activities toward completion of objective	Continue to follow up with the individuals who perform these functions to ensure that they fill this role as envisioned in the EEOC's regulations.

### Report of accomplishments and modifications to objective

We have individuals within the Bureau that serve the functions of Special Emphasis Program Managers, without that official title. These staff members serve as staff advisors, fact finders,

and subject matter experts, and they exist to identify the barriers that people in various communities (such as women, historically underrepresented groups, people with disabilities, and the LGBT community) may encounter when seeking employment and being hired or promoted in the Federal government.

For example, there is an employee in the OMWI who has oversight over the recruitment targeted at specific groups such as African Americans, women, Hispanics, and individuals with disabilities. This individual is also involved with the creation and roll-out of an employee resource group (ERG) policy and a mentoring bank program, and with facilitating the diversity and inclusion councils for both employees and executives. This individual, along with other subject matter experts within the Bureau, works with OCR staff in helping to identify barriers that exist for employees of various groups. Together these individuals collaborate to educate leadership by developing programs, forums, recruitment, and retention and succession plans and by developing training programs. They further evaluate the effectiveness of programs, plans, and activities toward achieving the objectives of the EEO program.

Further, OMWI, OCR, OHC, External Affairs, and CFPB's Culture Team work together to develop programs and activities for the various special observance months throughout the year, which have been very well-received. Additionally, on November 20, 2015, Director Cordray officially approved the Diversity and Inclusion Council of Employees (DICE). OCR received approval to leverage the members of the DICE to serve as collateral duty special emphasis program managers (SEPMs). These individuals will work in close collaboration with OMWI, OCR, and the Executive Advisory Council (EAC). DICE is made up of a group of approximately 15 diverse employees from various demographic groups, pay band levels, positions, and geographic locations. DICE will work collaboratively with the EAC to provide critical perspectives, it will provide a platform for employees to provide feedback to OMWI regarding diversity and inclusion efforts at the CFPB, and it will support affirmative employment and special emphasis programming efforts.

We will continue to monitor this issue to ensure that the functions of the Special Emphasis Program are being fulfilled, and will re-analyze the efficiency of this collaborative effort on a continuing basis to determine whether there are more effective alternatives that should be explored.

**TABLE 45: EEOC PART H-2**

<b>EEOC Form 715-01 Part H-2</b>	<b>U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report</b>
Consumer Financial Protection Bureau	FY2015
Statement of model program essential element deficiency	CFPB has not yet established timetables or schedules to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups.
Objective	CFPB will implement its Employee Recognition Awards Program and Procedures.
Responsible official	OCR Director, OHC Director
Date objective initiative	FY2014
Target date for completion of objective	September 30, 2016
Planned activities toward completion of objective	Employee Recognition Awards Program: Receive funding for the Employee Recognition Awards Program and Procedures.

## **Report of accomplishments and modifications to objectives**

The National Treasury Employees Union initially reviewed the Employee Recognition Awards Program in 2014, but it was not officially rolled-out at that time by CFPB. Management has begun additional work on an accountability framework for internal controls. The union and management have also met to discuss additional considerations from the recently-elected new chapter leadership and have agreed to launch a regular joint labor-management meeting to discuss ongoing implementation planning and program operations. The CFPB will fully fund the new program after policies are established to mitigate systemic barriers and prevent disparities from arising. At this time, OHC plans to roll-out this Program in March 2016.

# 11. EEO plan to eliminate identified barriers

TABLE 46: EEOC PART I-1

EEOC Form 715-01 Part I-1	U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report
Consumer Financial Protection Bureau	FY2015
<b>Statement of condition that was a trigger for a potential barrier:</b>  Provide a brief narrative describing the condition at issue.	During FY2015, several ethnic and racial groups increased their workforce participation at a rate slower than CFPB's total workforce. Additionally, several ethnic and racial groups had participation rates lower than their respective Relevant Civilian Labor Force ("RCLF") rates.  A review of workforce data tables revealed that Hispanic females, White Males, Asian Males and Females, Native Hawaiian/Other Pacific Islander Males and Females, and Two or More Race Males and Females had slower rates of increase than CFPB's total workforce.  Data also revealed that Females, Hispanic Males and Females, White Males and Females, Native Hawaiian/Other Pacific Islander Males, and American Indian/Alaskan Native Males and Females had participation rates lower than their respective RCLF rates.
<b>Barrier analysis:</b>  Provide a description of the steps taken and data analyzed to determine cause of the condition.	CFPB analyzed Tables A1 and B1 (Workforce) to compare the rates of increase for CFPB's workforce and each racial group comprising the workforce. Additionally, CFPB compared each racial group's workforce participation rate to its corresponding RCLF rate.  CFPB also did an internal audit of its hiring process using applicant flow data available from USAJobs.
<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.	Although CFPB complies with legal requirements related to hiring, it could benefit from additional mandatory internal guidelines for other aspects of the hiring process. The hiring process may not convey enough information to applicants and may result in applicants inadvertently self-selecting out of the process.

<b>Objective:</b>	
State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	OCR, OMWI, and OHC are currently working together to better understand and appropriately address the data results, and will apprise EEOC of progress.
Responsible official:	OCR, OMWI, OHC
Date objective initiated:	December 2015
Target date for completion of objective:	September 30, 2016
Planned activities toward completion of objective:	TARGET DATE (Must be specific)
OCR, OMWI, and OHC presented suggestions to the EAC on recommended changes to the hiring process.	January 2016
OCR, OMWI, and OHC will present recommendations to the Executive Committee and to the CFPB Director.	May 2016
CFPB will begin to implement approved recommendations to the hiring process on a short-term, mid-term, and long-term basis.	July 2016
CFPB will re-analyze applicant flow data to determine if any implemented changes have had a positive impact on the hiring process.	July 2017

### Report of accomplishments and modifications to objective

After conducting the data analysis, OCR, OMWI, and OHC collaborated to conduct best practice research, reinforce use of existing practices and tools that promote equity and fairness, and identify additional hiring process improvements that could be taken.

OHC has already began considering options and implementing changes using tools it already has at its disposal that did not require the implementation of new policies, including: enhancing structured interview, phone screening, and reference check tracking and guides; creating a

standardized structured interview question database, including standard D&I competency questions; creating a library of standardized benchmarks used to evaluate qualifications based on CFPB's competency model (which has gone through an extensive multi-year validation process); and creating interview guidance for applicants setting forth process and the roles of various CFPB personnel.

After getting feedback from Bureau leadership, OCR, OMWI, and OHC will develop additional recommendations to the Director for approval. After measures are in place and used for a period of time where data can be gathered that is statistically significant, we will again conduct a follow-up applicant flow analysis to assess the impact of these measures on the hiring process.

We also note another potential barrier that has been identified with respect to applicants: the federal hiring process may take too long, and, in some circumstances the best, most qualified candidates were accepting positions in the private sector before CFPB had the opportunity to offer a position. As a test of this potential barrier, OHC very recently worked with managers of a particular division who were attending a conference to give them the ability to collect applications, interview the best qualified, make selections, and ultimately offer jobs over the duration of the three-day conference. We will be analyzing pilots like this to see if they have a positive change in the hiring process, particularly with regard to the diversity of those interviewed and selected for positions.

TABLE 47: EEOC PART I-2

EEOC Form 715-01 Part I-2	U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report
Consumer Financial Protection Bureau	FY2015
<b>Statement of condition that was a trigger for a potential barrier:</b>  Provide a brief narrative describing the condition at issue.	During FY2015, Individuals with Targeted Disabilities ("IWTD") participated in CFPB's workforce at a rate lower than the Federal goal of 2%. Notably, from FY2014 to FY2015 CFPB's total workforce increased while the number of IWTDs stayed the same, leading to the percentage to decrease.  A review of workforce data tables revealed that there were 11 IWTDs (0.72%) during FY2015 and 11 (0.77%) IWTDs during FY2014.
<b>Barrier analysis:</b>  Provide a description of the steps taken and data analyzed to determine cause of the condition.	CFPB analyzed Table B1 (Workforce) to compare the rates of increase for CFPB's workforce and IWTDs. CFPB also compared the rate of IWTDs to the 2% Federal goal.  Additionally, CFPB analyzed Table B14 to compare IWTD rate

**U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report**

of separation to their workforce participation.

Lastly, CFPB reviewed CFPB's diversity recruitment initiatives to evaluate the agency's efforts to identify qualified IWTDs.

**Statement of identified barrier:**

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

No barrier has been found at this time.

**Objective:**

State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.

Increase efforts to collect data beyond statistics (such as anecdotal evidence, survey results, etc.) to determine if a barrier exists.

Responsible official:

OCR, OHC, OMWI

Date objective initiated:

January 2016

Target date for completion of objective:

September 30, 2016

Planned activities toward completion of objective:

TARGET DATE  
September 30, 2016

Develop and implement a plan for recruiting IWTDs

September 30, 2016

Evaluate reasonable accommodation and training programs and create retention strategies for IWTDs

September 30, 2016

### Report of accomplishments and modifications to objective

CFPB recently was ranked amongst the “Top 20 Government Employers” in 2015 in Careers & the disABLED Magazine amongst the Agencies who provide a positive working environment for people with disabilities. In fact, CFPB was ranked as #13, and was the only federal financial regulatory agency (FIRREA agency) ranked on the list.

In 2015, CFPB implemented a Recruitment and Outreach Plan, which identified individuals with disabilities as one of the targets of the agency's recruitment and outreach efforts. In FY2015, the Bureau made great strides in targeted recruitment efforts for individuals with targeted

disabilities. For example, the Bureau attended recruitment events specifically focusing on individuals with targeted disabilities, including: Gallaudet Spring Internship and Job Fair 3/27/2015; Federal Employees with Disabilities and FEDQ New Perspective Conference 4/30/2015; Careers & disABLED magazine Career Expo for people with disabilities 5/1/2015; Careers & disABLED magazine EOP's Stem Diversity Career Expo 5/29/2015; and Careers & the disABLED magazine Career Expo for people with disabilities 11/13/2015.

Additionally, all Schedule A appointees at the Bureau who have worked two years or more have been converted to the competitive service. Hiring managers are encouraged by OHC, OCR, and OMWI to consider and use the Schedule A hiring authority to fill vacancies.

Schedule A training for all recruitment officials is readily available and taken. OHC, OCR, and OMWI personnel are knowledgeable about this flexibility. A recruitment toolkit for recruiting ambassadors outside of OHC, OCR, and OMWI is available on the intranet and a PowerPoint presentation is provided to recruiters. The guide advises that before any recruiting event, the recruiters must understand the federal hiring rules, including special hiring authorities.

Information about the Schedule A hiring authority for people with disabilities is included and always readily available to recruiters in the following resources:

- Recruiting Ambassadors Toolkit that is available to all on the intranet;
- Federal Hiring Authorities page that is available to all on the intranet;
- CFPB's Hiring, Promotion, and Internal Personnel Movements Policy;
- CFPB Hiring Manager's Guide that is available to all managers on the intranet; and
- A stand-alone intranet page explaining the Schedule A hiring authority, which contains links to information about the Schedule A authority from EEOC, the Office of Personnel Management (OPM), and the Office of Disability Employment Policy (ODEP) at the Department of Labor.

Additional information is periodically circulated as reminders that the Schedule A hiring authority is available and managers—who also may serve as recruiters—are encouraged to use it as a tool that can both enhance the diversity of the CFPB workforce and speed the hiring process. For example:

- Schedule A flexibility highlighted in a Manager Minute along with CFPB's reasonable

accommodation coordinator (October 14, 2014)

- Schedule A flexibility highlighted in a Manager Minute (October 7, 2015)

Finally, management officials and recruitment officials also have other frequent educational opportunities on numerous disability-related employment topics, including Schedule A. In fiscal year 2015, management officials had the following access to relevant educational materials:

- On July 2015, approximately half of all CFPB managers attended training by national expert David Fram on “Disability and Reasonable Accommodation Training”;
- In October 2014 and 2015 during National Employment Awareness Disability Month, OCR published an article on the flexibility of the Schedule A disability hiring authority for inclusion in the CFPB “Manager’s Minute” communication;
- In March and October 2015, disability etiquette tips were circulated to all employees through various communication vehicles; and
- In early November 2015, in celebration of National Employment Awareness Disability Month, OCR coordinated a panel discussion (moderated by the Director of OCR) comprising employees with disabilities sharing their stories, and highlighted Schedule A hiring flexibility.

The Director of OCR has also recently reconvened a Bureau-wide Disability Working Group and Steering Committee. The purpose of the group is to set priorities for safeguarding and promoting the rights of applicants, employees, contractors, and consumers with disabilities in all Bureau activities. The group is exploring better ways to recruit and retain workers with disabilities, enhance reasonable-accommodations provided to workers and consumers who contact the Bureau with financial complaints, educate managers and supervisors on disability topics, including Schedule A, and enhance data collection efforts (among other priorities). The steering and working groups consist of thought leaders from major CFPB segments, including OCR, OMWI, OHC, the CFPB Ombudsman office, the Bureau’s Office of Consumer Response, the Legal Division, and others. Members include experts on the employment provisions of the Americans with Disabilities Act and Section 501 of the Rehabilitation Act, on Sections 504 and 508 of the Rehabilitation Act, and on recruitment, retention, and compensation policy issues.

TABLE 48: EEOC PART I-3

EEOC Form 715-01 Part I-3	U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report
Consumer Financial Protection Bureau	FY2015
<b>Statement of condition that was a trigger for a potential barrier:</b>	<p>During FY2015, analysis revealed that several racial and ethnic groups participated in Major Occupations 0301 (Misc. Administration), 0570 (Examiner), 0110 (Economist) and 0905 (Attorney) at rates lower than their RCLF rates.</p> <p>A review of workforce data tables revealed that the following groups were underrepresented in Major Occupation 0301: Females, Hispanic Males and Females, White Females, American Indian/Alaskan Native Females, and Two or More Race Males.</p>
Provide a brief narrative describing the condition at issue.	In Major Occupation 0570, Males, Hispanic Males, and White Males were underrepresented.
How was the condition recognized as a potential barrier?	<p>In Major Occupation 0110, Males, Hispanic Males, Hispanic Females, White Males, White Females, Black Males, Native Hawaiian or Other Pacific Islander Females, American Indian or Alaskan Native Males and Females, and Two or more race Males were underrepresented.</p> <p>Lastly, in Major Occupation 0905, Males, Hispanic Males and White Males were underrepresented.</p>
<b>Barrier analysis:</b> Provide a description of the steps taken and data analyzed to determine cause of the condition.	<p>CFPB analyzed Tables A6 and B6 (Major Occupations) to compare each racial groups participation in each of CFPB's Major Occupations to their respective RCLF rates.</p> <p>CFPB also reviewed Tables A7 &amp; B7 (Applicants and Hires for Major Occupations) to analyze the number of qualified applicants for the agency's Major Occupation identified for each racial group.</p>
<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.	We will continue to analyze that data and conduct additional in depth analyses into other gathered information to identify whether a barrier exists. This analysis will include review of whether hiring processes discussed in I 1 also affect these participation rates.
<b>Objective:</b> State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	CFPB will continue to monitor the participation rates for the identified groups. CFPB will also review its recruitment and retention programs to increase representation of the relevant groups

EEOC Form 715-01 Part I-3	U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report
Responsible official:	OCR, OMWI, OHC
Date objective initiated:	December 2015
Target date for completion of objective:	September 30, 2016
Planned activities toward completion of objective:	TARGET DATE (Must be specific)
CFPB will conduct additional review of the job description, qualification criteria and hiring practices to ensure selection requirements and procedures are job related and consistent with business necessity.	September 30, 2016
CFPB will continue to analyze applicant data and monitor applicant rates, qualification rates and selection rates	September 30, 2016
CFPB will review the selection process regularly to ensure equal treatment	September 30, 2016
OEOF will be consulted on selection panel participants	September 30, 2016
CFPB will continue its targeted outreach efforts	September 30, 2016

## Report of accomplishments and modifications to objective

CFPB implemented a robust recruitment plan in 2015. Through this plan, the Bureau identified more than 40 diversity events to attend this year. One of the targeted outcomes of event-based recruiting is to provide demographic support to the Bureau. For example, OHC is working with the Bureau's divisions to expand targeted diversity outreach for veterans, persons with disabilities, and affinity affiliated industry events (e.g., women in technology, Hispanics in law). CFPB will analyze this recruitment plan in the future to ensure that it is yielding the desired results.

Please see I-1 for an in-depth description of our plan to review our hiring process, which may or may not have an impact on this issue.

TABLE 49: EEOC PART I-4

EEOC Form 715-01 Part I-4	U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report
Consumer Financial Protection Bureau	FY2015
<b>Statement of condition that was a trigger for a potential barrier:</b>  Provide a brief narrative describing the condition at issue.	During FY2015, several ethnic and racial groups participated in senior level positions and grade levels GS-13 – 15 (Pay Bands 53 to 71 equivalent at CFPB) at rates lower than their participation in CFPB's workforce.  A review of workforce data tables revealed that Hispanic Males and Females, African American Males and Females and Asian Males participated in one or more of the grade levels GS-13-15 Pay Bands 53 to 71 equivalent at CFPB) at rates lower than their participation in CFPB's workforce.
How was the condition recognized as a potential barrier?	CFPB analyzed A4-1, A4-2, B4-1 and B4-2 (Grade Level Distributions) to compare each racial group's participation in high level grade levels to their respective participation in CFPB's workforce. The analysis conducted to date has not identified a cause for the potential barrier.
<b>Barrier analysis:</b>  Provide a description of the steps taken and data analyzed to determine cause of the condition.	We will continue to analyze that data and additional in depth analyses into other gathered information to identify whether a barrier exists. This analysis will include review of whether hiring processes discussed in I 1 also affect these participation rates.
<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.	Analysis has not revealed any discriminatory policies, practices, or procedures that have created a barrier.
<b>Objective:</b>  State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	CFPB will continue to monitor and examine its employment and promotion policies or procedures to determine whether any barriers exist.
Responsible official:	OCR, OMWI, OHC
Date objective initiated:	December 2015

EEOC Form 715-01 Part I-4	U.S. Equal Employment Opportunity Commission Federal Agency Annual EEO Program Status Report
Target date for completion of objective:	September 30, 2016
Planned activities toward completion of objective:	TARGET DATE (Must be specific)
CFPB will continue to examine its promotion practices and address any problematic observations.	September 30, 2016
CFPB will review surveys to assess whether any information contained in the results could help explain the cause of the low participation among certain groups in higher-banded positions.	September 30, 2016

## Report of accomplishments and modifications to objective

The Dodd-Frank Act allowed the CFPB to have a statutory hiring exemption for executive positions. As a result, we do not have data for these selections to analyze to try to determine where potential barriers may be preventing certain groups from participating at levels comparable to the CLF. In FY2015, after expiration of a statutory hiring exemption set forth in the Dodd-Frank Act, CFPB began to collect applicant data for executive positions. Going forward, we will be able to conduct the necessary barrier analyses.

Additionally, please see I-1 for an in-depth description of our plan to review our hiring process, which may or may not have an impact on this issue.

## 12. Special program plan for the recruitment, hiring, and advancement of individuals with targeted disabilities

**TABLE 50:** EEOC FORM 715-01 PART J, SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, HIRING, AND ADVANCEMENT OF INDIVIDUALS WITH TARGETED DISABILITIES – PART I DEPARTMENT OR AGENCY INFORMATION

Agency and Subcomponent Labels	Agency and Subcomponent Information
1. Agency	1. Consumer Financial Protection Bureau
1.a. 2 <sup>nd</sup> Level Component	1.a. Not applicable
1.b. 3 <sup>rd</sup> Level or lower	1.b. Not applicable

**TABLE 51:** EEOC FORM 715-01 PART J, SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, HIRING, AND ADVANCEMENT OF INDIVIDUALS WITH TARGETED DISABILITIES – PART II EMPLOYMENT TREND AND SPECIAL RECRUITMENT FOR INDIVIDUALS WITH TARGETED DISABILITIES

	Beginning of FY 2015 #	Beginning of FY 2015 %	End of FY 2015 #	End of FY 2015 %	Net change #	Rate of change
Total Work Force	1,427	100%	1,527	100%	100	7.01%
Reportable Disability	120	8.41%	131	8.58%	11	9.17%
Targeted Disability*	11	0.77%	11	0.72%	0	0.00%

\* If the rate of change for persons with targeted disabilities is not equal to or greater than the rate of change for the total workforce, a barrier analysis should be conducted (see below).

**TABLE 52:** NUMBER OF APPLICANTS AND SELECTIONS OF PERSONS WITH TARGETED DISABILITIES

<b>Targeted Disability Applicant and Selection Labels</b>	<b>Targeted Disability Applicant And Selection Data for CFPB</b>
1. Total Number of Applications Received From Persons With Targeted Disabilities during the reporting period.	20
2. Total Number of Selections of Individuals with Targeted Disabilities during the reporting period.	0

**TABLE 53:** EEOC FORM 715-01 PART J, PART III PARTICIPATION RATES IN AGENCY EMPLOYMENT PROGRAMS

<b>Other Employment/Personnel Programs</b>	<b>Total</b>	<b>Reportable Disability #</b>	<b>Reportable Disability %</b>	<b>Targeted Disability #</b>	<b>Targeted Disability %</b>	<b>Not Identified #</b>	<b>Not Identified %</b>	<b>No Disability #</b>	<b>No Disability %</b>
3. Competitive Promotions	14	0	0%	0	0%	11	78.57%	3	21.43%
4. Non-Competitive Promotions	651	64	9.83%	3	0.46%	19	2.92%	568	87.25%
5. Employee Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5.a. CN 31-52 (GS 5-12 equivalent)	599	69	11.52%	5	.83%	17	2.84%	513	85.64%
5.b. CN 53-60 (GS 13-14 equivalent)	610	42	6.89%	3	0.49%	13	2013%	555	90.98%
5.c. CN 71-90 (GS 15/SES equivalent)	299	20	6.68%	3	1.00%	7	2.34%	272	90.97%
6. Employee Recognition and Awards	1,238	106	8.56%	9	0.73%	23	1.86%	1,109	89.58%
6.a. Time-Off Awards (Total hrs awarded)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6.b. Cash Awards (total \$\$\$ awarded)	\$4,456, 181	106	8.56%	9	0.73%	23	1.86%	1,109	89.58%
6.c. Quality-Step Increase	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

## EEOC Form 715-01 Part J Part IV Identification and Elimination of Barriers

Agencies with 1,000 or more permanent employees MUST conduct a barrier analysis to address any barriers to increasing employment opportunities for employees and applicants with targeted disabilities using FORM 715-01 PART I. Agencies should review their recruitment, hiring, career development, promotion, and retention of individuals with targeted disabilities in order to determine whether there are any barriers.

## EEOC Form 715-01 Part J, Part V Goals for Targeted Disabilities

Agencies with 1,000 or more permanent employees are to use the space provided below to describe the strategies and activities that will be undertaken during the coming fiscal year to maintain a special recruitment program for individuals with targeted disabilities and to establish specific goals for the employment and advancement of such individuals. For these purposes, targeted disabilities may be considered as a group. Agency goals should be set and accomplished in such a manner as will effect measurable progress from the preceding fiscal year. Agencies are encouraged to set a goal for the hiring of individuals with targeted disabilities that is at least as high as the anticipated losses from this group during the next reporting period, with the objective of avoiding a decrease in the total participation rate of employees with disabilities.

Goals, objectives and strategies described below should focus on internal as well as external sources of candidates and include discussions of activities undertaken to identify individuals with targeted disabilities who can be (1) hired; (2) placed in such a way as to improve possibilities for career development; and (3) advanced to a position at a higher level or with greater potential than the position currently occupied.

**TABLE 54: GOAL FOR TARGETED DISABILITIES**

<b>Goal</b>	<b>CFPB adopts the federal government target goal of 2%</b>
	In CFPB's most recent MD-715 annual report, the Agency had a goal to reach 2.0% representation by persons with targeted disabilities within the total workforce by the end of FY2015. CFPB is recommitting to achievement of this goal and will continue to take steps to educate hiring managers about Schedule A flexibilities for onboarding persons with disabilities.
Objectives	During FY2015, persons with targeted disabilities represented 0.72% of the total workforce. The Agency hired applicants with targeted disabilities at a rate of 0.63% and applicants without targeted disabilities at a rate of 30.63%. We note that 68.75% of hired applicants did not identify whether they have a disability.
	It is critical that CFPB set goals that will enable it to achieve measurable progress from the preceding fiscal year. CFPB needs to continue to implement a strategic plan that accounts for the potential loss of employees with targeted disabilities and also aggressively recruits applicants with targeted disabilities to ensure an increase in the total participation rate.

Goal	<b>CFPB adopts the federal government target goal of 2%</b>
	<p>It is critical that CFPB collect relevant data in order to be able to conduct a thorough barrier analysis of the workforce data composite of persons with targeted disabilities at each grade and their participation throughout the hiring process.</p>
Strategies	<p>Training and mentoring is important in the career development and retention of current employees with targeted disabilities. Community outreach and student programs are beneficial for the recruitment efforts to attract applicants.</p> <p>These strategies need to be implemented to fortify the goal of reaching 2.0% representation by persons with targeted disabilities.</p> <p>Note: OCR attempted to identify potential barriers for IWTDS by doing a workforce data composite analysis via a formulated Excel spreadsheet provided by the EEOC. During our attempt at this analysis, it was realized that CFPB does not have all of the data available to do this analysis. The Director of OCR will work with CFPB personnel in OHC to ensure this data is gathered and a thorough analysis is conducted in FY2016, as possible, and in future fiscal years.</p>