

CONSUMER FINANCIAL PROTECTION BUREAU | FEBRUARY 2023

# Annual Performance Plan and Report, and Budget Overview



Consumer Financial  
Protection Bureau

# Table of Contents

<b>Overview of the Consumer Financial Protection Bureau .....</b>	<b>3</b>
Mission, Vision, and Values .....	4
Strategic Plan Overview .....	4
About the FY 2023 APP.....	5
<b>Bureau Commitment to Diversity, Equity, Inclusion, and Accessibility .....</b>	<b>6</b>
<b>Budget Overview .....</b>	<b>8</b>
Budget by Strategic Goal.....	8
Summary of Key Investments .....	10
Budget by Object Class and Program .....	13
Bureau Fund Budget Authority.....	16
Civil Penalty Fund Budget Authority.....	18
<b>Goal 1. Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers' needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination .....</b>	<b>20</b>
Objective 1.1 .....	20
Objective 1.2 .....	22
Objective 1.3.....	26
<b>Goal 2: Empower consumers to live better financial lives, focusing on traditionally underserved people .....</b>	<b>30</b>
Objective 2.1 .....	30
Objective 2.2 .....	33
Objective 2.3.....	36

<b>Goal 3: Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services .....</b>	<b>40</b>
Objective 3.1.....	40
Objective 3.2 .....	44
<b>Goal 4: Foster operational excellence and further commitment to workforce equity to advance the CFPB's mission.....</b>	<b>48</b>
Objective 4.1 .....	49
Objective 4.2 .....	53
Objective 4.3 .....	56
<b>Appendix A: Historical Measures .....</b>	<b>61</b>
<b>Appendix B: Data Validation .....</b>	<b>72</b>
<b>Appendix C: Management Challenges .....</b>	<b>81</b>
<b>Appendix D: Defined Terms .....</b>	<b>87</b>

# Overview of the Consumer Financial Protection Bureau

The Consumer Financial Protection Bureau (“CFPB” or “Bureau”) was established on July 21, 2010, under Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act Public Law No. 111-203 (Dodd-Frank Act). The CFPB is an independent bureau within the Federal Reserve System, and an executive agency as defined in Section 105 of Title 5, United States Code.

The Dodd-Frank Act authorizes the CFPB to exercise its authorities to ensure that, with respect to consumer financial products and services:<sup>1</sup>

Consumers are provided with timely and understandable information to make responsible decisions about financial transactions;

Consumers are protected from unfair, deceptive, or abusive acts and practices and from discrimination;

Outdated, unnecessary, or unduly burdensome regulations are regularly identified and addressed in order to reduce unwarranted regulatory burdens;

Federal consumer financial law is enforced consistently in order to promote fair competition; and

Markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.

The CFPB is headed by a sole Director, appointed by the President to a five-year term, by and with the advice and consent of the Senate.

Funding required to support the CFPB’s operations is obtained primarily through transfers from the combined earnings of the Federal Reserve System. More information can be found in the Budget Overview section of this document.

---

<sup>1</sup> As set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203 (2010), Section 1021(b).

# Mission, Vision, and Values

The CFPB *Strategic Plan for Fiscal Year (FY) 2022 – FY 2026* identifies the following mission, vision, and values, which guide the work of the CFPB.

## Mission

To regulate the offering and provision of consumer financial products or services under the federal consumer financial laws, to enforce Federal consumer financial law fairly and consistently, and to educate and empower consumers making financial decisions.

## Vision

To ensure all households have access to markets for consumer financial products and services that are fair, transparent, and competitive. In a market that works, the prices, risks, and terms of the deal are clear upfront so that consumers can understand their options and comparison shop, and where companies all play by the same consumer protection rules and compete fairly on providing quality and service.

## Values

To achieve this vision, the CFPB is guided by the following values:

**Service.** We work for the American public, putting traditionally underserved people at the center of all that we do.

**Dedication.** We are committed to the mission and to deploying the CFPB’s tools and resources to address the needs of communities, providers, and the economy as a whole.

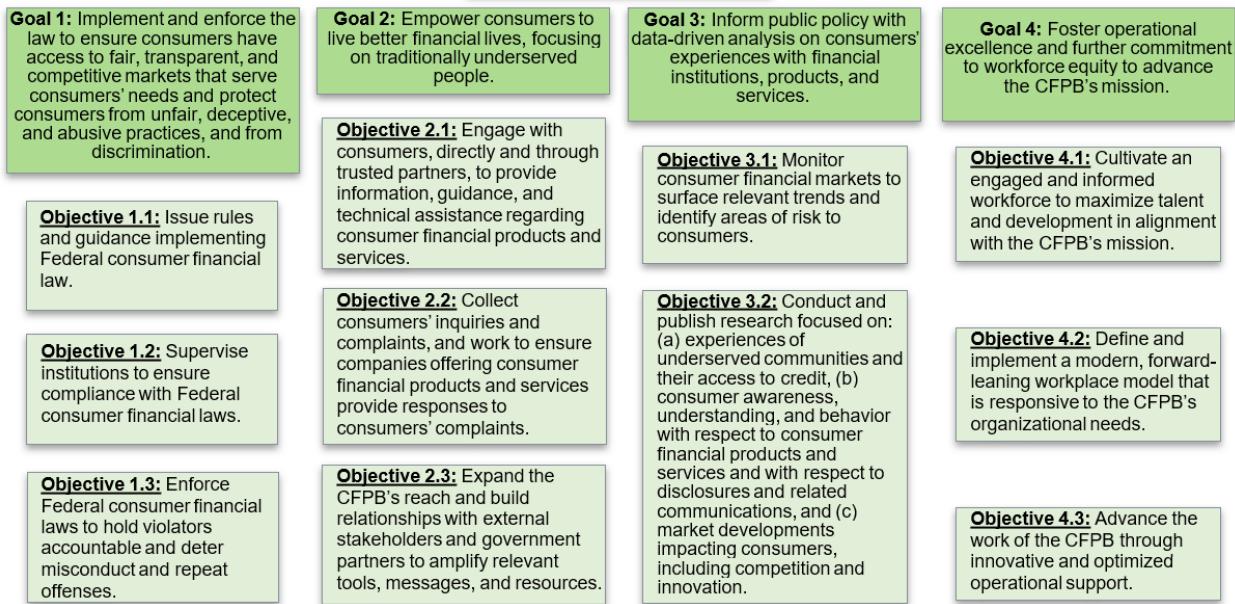
**Diversity.** We strive to maintain a diverse workforce and an equitable, inclusive, and accessible workplace for all employees.

## Strategic Plan Overview

The FY 2023 Annual Performance Plan and Report (APP) aligns to CFPB’s Strategic Plan for FY 2022-2026, which can be found at <https://www.consumerfinance.gov/about-us/budget-strategy/strategic-plan/>.

CFPB’s FY 2022 – 2026 strategic plan includes four strategic goals and eleven associated objectives, detailed below.

## CFPB FY 22–26 Strategic Plan



## About the FY 2023 APP

This APP was developed between December 2022 – January 2023. It identifies the performance measures and targets for each strategic goal and objective, as well as:

- Presents FY 2022 performance results;
- Describes CFPB's accomplishments; and
- Provides CFPB's most current view of budget projections for FY 2023-2024.

The GPRA Modernization Act (GPRAMA) of 2010 asks agencies to identify lower-priority program activities, where applicable – CFPB has none.

# Bureau Commitment to Diversity, Equity, Inclusion, and Accessibility

The CFPB's mission is to make consumer financial markets work for consumers, financial institutions, and the economy as a whole. The CFPB protects consumers from unfair, deceptive, or abusive practices and discrimination and takes action against companies that break the law. The CFPB arms people with the information, resources, and tools they need to make informed financial decisions. There is an interdependence between what the CFPB does externally and how the CFPB works internally. By examining operations, eliminating systemic barriers to equal access to opportunities for CFPB employees, and fostering a culture of equity, inclusion, and accessibility for all employees, the CFPB can best achieve its responsibility to protect consumers and ensure the needs of the most underserved consumers are met.

To further the CFPB's efforts in FY 2022:

- The CFPB developed and released a new *2022-2026 Bureau-wide Diversity, Equity, Inclusion, and Accessibility (DEIA) Strategic Plan* that aligns with agency priorities and statutory responsibilities, as well as the goals and objectives highlighted in the CFPB Strategic Plan. The goals of this five-year plan focus on six key areas:
  1. **Leadership Commitment:** Empower and support leaders in creating an equitable work environment where fair and equitable recruitment, hiring, pay, advancement, and retention practices are used at all levels and are a priority;
  2. **Workforce Diversity:** Develop an internal diverse talent pipeline;
  3. **Workplace Inclusion:** Foster a connected and psychologically safe culture where employees feel free to speak up and raise issues and concerns;
  4. **Supplier Diversity:** Prioritize doing business with Minority and Women-owned Businesses (MWOBs) and eliminate barriers to equal participation;
  5. **Industry Diversity:** Promote diversity and inclusion efforts within the financial services industry consistent with the Joint Standards for Assessing and Diversity and Inclusion Practices in Regulated Entities; and
  6. **Sustainability:** Develop strategies and processes to promote and sustain an inclusive and equitable culture at the CFPB.
- Each Division within CFPB developed its own DEIA Strategic Action Plan. These plans supported the achievement of the overall CFPB DEIA Strategic Plan and the CFPB Strategic Plan by introducing greater accountability for the DEIA goals while allowing

each Division to tailor the actions to the needs of their specific workforce. Division leaders shared progress on these plans with the Director during the mid-year Biannual Performance Review meetings. Divisional DEIA Action Plans will be developed each fiscal year with new action items aligned to support progress on the Bureau-wide DEIA and Strategic plans.

CFPB recognizes that some of our mission work aligns with guidance from the White House Domestic Policy Council and Executive Orders (EO) 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce and EO 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. Demonstrating our commitment to DEIA, CFPB voluntarily submitted an Equity Action Plan to the Office of Management and Budget in January 2022 and the CFPB DEIA Strategic Plan to the Office of Personnel Management (OPM) in March 2022. Additional information concerning the CFPB's DEIA efforts can be found online at <https://www.consumerfinance.gov/about-us/diversity-and-inclusion> and in the forthcoming Office of Minority and Women Inclusion Annual Report to Congress, scheduled to be published in March 2023.

# Budget Overview

The CFPB's operations are funded principally by transfers made by the Board of Governors of the Federal Reserve System (Board) from the combined earnings of the Federal Reserve System, up to the limits set forth in the Dodd-Frank Act. The Director of the CFPB requests transfers from the Board in amounts that they have determined are reasonably necessary to carry out the CFPB's mission within the limits set forth in the Dodd-Frank Act. Transfers from the Board were capped at \$734.0 million in FY 2022 and are capped at \$750.9 million in FY 2023 and \$785.4 million in FY 2024. Funds transferred from the Federal Reserve System are deposited into the Bureau of Consumer Financial Protection Fund (Bureau Fund) at the Federal Reserve Bank of New York.

The FY 2023 and FY 2024 budget estimates for the Bureau Fund allow the CFPB to continue to fulfill its statutory purpose, objectives, and functions pursuant to Section 1021 of the Dodd-Frank Act. In FY 2022, the CFPB incurred obligations totaling \$622.2 million. The budget estimates for FY 2023 and FY 2024 increase to \$653.2 million and \$684.9 million, respectively. The FY 2023 budget estimate represents a 5.0% increase from FY 2022 levels, while the FY 2024 estimate represents a 4.9% increase from FY 2023.

## Budget by Strategic Goal

**BUDGET BY STRATEGIC GOAL (\$ IN THE MILLIONS AND ROUNDED)**

	<b>2022</b>	<b>%</b>	<b>2023</b>	<b>%</b>	<b>2024</b>	<b>%</b>
Goal 1	\$268.3	44%	\$283.9	44%	\$297.2	44%
Goal 2	\$87.3	14%	\$89.7	14%	\$95.3	14%
Goal 3	\$71.1	11%	\$83.3	11%	\$86.2	11%
Goal 4	\$195.5	31%	\$196.2	31%	\$206.2	31%
<b>Total</b>	<b>\$622.2</b>	<b>100%</b>	<b>\$653.2</b>	<b>100%</b>	<b>\$684.9</b>	<b>100%</b>

**FULL-TIME EQUIVALENT (FTE) BY STRATEGIC GOAL (ROUNDED)**

	<b>2022</b>	<b>%</b>	<b>2023</b>	<b>%</b>	<b>2024</b>	<b>%</b>
Goal 1	834	53%	868	53%	877	53%
Goal 2	179	12%	189	12%	193	12%
Goal 3	193	12%	209	12%	213	12%
Goal 4	356	23%	368	23%	374	23%
<b>Total</b>	<b>1,561</b>	<b>100%</b>	<b>1,635</b>	<b>100%</b>	<b>1,658</b>	<b>100%</b>

Budget increases across all goals reflect increased hiring towards the approved staffing targets as well as additional funding for new initiatives in pursuit of the CFPB's mission and strategic goals.

### Goal 1

Activities in Goal 1, related primarily to supervision and enforcement, and issuance of consumer financial regulations and guidance implementation, represent the largest portion of the CFPB's budget. This level of funding reflects the CFPB's focus on ensuring markets for consumer financial products and services are fair, transparent, and competitive. Costs related to supervision and enforcement training and travel are projected to gradually resume to their pre-pandemic levels as the CFPB slowly returns to conducting supervision exams and reviews of depository and non-depository institutions on-site, consistent with applicable post-pandemic guidance. The budget also includes funding to gather expertise and strategy support for the implementation of an enterprise level registration system for non-bank financial institutions in FY 2024. Additional increases in supervision technology tools, investigation and litigation support are also planned to help the CFPB's supervision and enforcement work. In FY 2022, CFPB continued to work on the rulemaking and regulatory guidance under the Small Business Lending (SBL) Help initiative.

### Goal 2

Activities related to consumer education, consumer engagement, and handling of consumer complaints in Goal 2 represent 14% of the CFPB's overall budget. To support this goal, the CFPB will continue to invest in helping consumers make informed financial decisions and empower them to build the financial skills necessary to live better financial lives; facilitating the collection, monitoring, and response to consumer complaints; and increasing effectiveness of governing consumer financial markets. Costs for consumer education initiatives increase as the CFPB invests in policy research and development for effective engagement with traditionally underserved consumers.

### Goal 3

Activities related to research and monitoring developments and trends in consumer financial markets in Goal 3 represent 11% of the CFPB's overall budget. In FY 2023 and FY 2024, the CFPB will expand its primary data collections and invest in further studies and market research focused on underserved consumers. The CFPB will also continue to invest resources to the Home Mortgage Disclosure Act (HMDA) Platform and National Mortgage Database to ensure consumer financial markets operate in a transparent, efficient, and inclusive manner to facilitate access and innovation. Additionally, the CFPB will fund the design and development of the SBL

collection and monitoring system and expects these costs to taper off in the outyears as costs shift over to maintenance and operation.

#### Goal 4

Activities in Goal 4 represent around 31% of the budget and reflect the CFPB's commitment to fostering operational excellence and in cultivating an equitable, informed, and engaged workforce to advance the CFPB's mission. In FY 2023, the largest increases are primarily driven by significant investments in information technology (IT) as the CFPB continues to implement its vision and strategy to modernize its IT systems and services. Investments will go towards enhancing cybersecurity capabilities as required under the government-wide Zero Trust Architecture directive, and Cybersecurity Executive Order, migrating to cloud-native applications, and leveraging further cloud technology infrastructure and services. Additionally, the CFPB will continue to invest in IT program and project management support services as it prioritizes technology needs to securely connect and integrate IT systems and share data.

To manage risk and promote accountability, the CFPB will continue to develop its capabilities to identify and mitigate enterprise risks, improve the management of internal policies and the effectiveness of enterprise governance bodies, effectively review and assess internal controls, and support required audits. At the same time, the CFPB will continue to leverage shared-service providers for financial management, human resources, procurement, and other services.

### Summary of Key Investments

The table below details the funding levels for the CFPB's key non-personnel investments by strategic goal and objective. Key investments are presented in more detail in the discussion of each goal.

#### **KEY INVESTMENTS (\$ IN THE MILLIONS AND ROUNDED)**

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
1.1	Small Business Data Collection Rulemaking	\$1.4	\$0.0	\$0.0
<b>1.1 Total</b>		<b>\$1.4</b>	<b>\$0.0</b>	<b>\$0.0</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
1.2	Examiner Commissioning Training Program	\$1.2	\$1.2	\$1.3
	Supervision and Enforcement Training & Travel	\$2.6	\$9.8	\$10.5
	Supervision Technology Tools	\$2.0	\$2.6	\$1.3

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
	Nonbank Registration	\$0.0	\$1.0	\$1.4
<b>1.2 Total</b>		<b>\$5.8</b>	<b>\$14.5</b>	<b>\$14.4</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
1.3	Enforcement Knowledge/Matter Management	\$1.2	\$1.3	\$1.4
	Investigation and Litigation Support	\$9.2	\$14.0	\$14.3
<b>1.3 Total</b>		<b>\$10.4</b>	<b>\$15.3</b>	<b>\$15.7</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
2.1	Financial Education Initiatives	\$6.2	\$4.3	\$5.7
<b>2.1 Total</b>		<b>\$6.2</b>	<b>\$4.3</b>	<b>\$5.7</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
2.2	Consumer Response Complaint Intake, Handling, and Analytics	\$8.5	\$9.3	\$9.2
	Consumer Response Contact Center	\$11.0	\$12.1	\$12.5
<b>2.2 Total</b>		<b>\$19.4</b>	<b>\$21.4</b>	<b>\$21.7</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
2.3	Financial Education Research & Tools for Financial Educators of Adults and Youth	\$1.7	\$1.4	\$1.4
	Language Access Program	\$0.8	\$0.7	\$0.7
<b>2.3 Total</b>		<b>\$2.4</b>	<b>\$2.1</b>	<b>\$2.2</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
3.1	Consumer Experience Program	\$1.9	\$2.1	\$2.2
	HMDA Operations	\$3.1	\$3.4	\$3.5
	Other Market Data	\$1.3	\$1.4	\$1.4
	Small Business Lending Program	\$0.8	\$4.7	\$5.3

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
	Special Populations Programs	\$0.7	\$1.2	\$0.9
<b>3.1 Total</b>		<b>\$7.8</b>	<b>\$12.9</b>	<b>\$13.3</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
3.2	National Mortgage Database	\$1.9	\$1.9	\$1.9
	Primary Data Collection	\$1.0	\$4.2	\$3.3
<b>3.2 Total</b>		<b>\$2.9</b>	<b>\$6.1</b>	<b>\$5.2</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
4.1	Human Capital Shared Services, Infrastructure, and Operations	\$6.3	\$6.8	\$6.2
	Learning, Leadership, and Organization Development	\$2.5	\$4.8	\$3.4
	Facilitation and Design			
	Staffing, Recruitment, & Compensation Initiatives	\$0.4	\$0.5	\$0.5
<b>4.1 Total</b>		<b>\$9.2</b>	<b>\$12.0</b>	<b>\$10.1</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
4.2	Cloud Application Platforms	\$5.6	\$5.7	\$6.1
	Cloud Infrastructure and Services	\$20.7	\$23.7	\$25.6
	Design and Software Development Support	\$6.3	\$5.3	\$5.6
	IT Portfolio Management and Enterprise Architecture	\$10.8	\$6.9	\$7.3
	Legal Technology Platform	\$5.7	\$5.5	\$5.8
	Leverage Diversity, Equity, Inclusion, and Accessibility	\$0.6	\$1.0	\$0.9
	Technology Strategy and Transformation Support	\$0.8	\$1.6	\$1.7
<b>4.2 Total</b>		<b>\$50.5</b>	<b>\$49.7</b>	<b>\$53.0</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
4.3	Audits of the CFPB	\$15.5	\$14.8	\$15.3
	Cybersecurity	\$17.4	\$16.4	\$19.6
	Data Infrastructure and Analysis	\$2.9	\$3.9	\$4.0

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
	Enterprise Risk Management, Internal Policies, Audit Oversight, and Enterprise Governance Support	\$0.9	\$1.0	\$1.0
	Financial Management Support Services, including Travel	\$4.1	\$4.0	\$4.1
	Internal Control Assessment Program Support	\$1.0	\$1.1	\$1.1
	Knowledge Management	\$0.6	\$0.6	\$0.6
	Procurement Services and Support	\$2.2	\$2.6	\$2.4
<b>4.3 Total</b>		<b>\$44.6</b>	<b>\$44.4</b>	<b>\$48.2</b>

<b>Objective</b>	<b>Investment Category</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
ALL	Data Strategy and Management	\$0.6	\$1.4	\$1.2
	Enterprise Customer Relationship Management Platform	\$13.9	\$12.3	\$12.8
	Facilities Agreements (Occupancy)	\$18.8	\$18.2	\$18.5
	Facilities Agreements (Utilities, Security, Other)	\$8.9	\$11.3	\$10.7
	Federal Reserve Board Retirement Plan Management Services	\$1.6	\$1.8	\$1.9
	HQ Building Renovation	\$0.5	\$0.0	\$0.4
	Library Resources and Services	\$3.3	\$3.6	\$3.8
	Personnel Security Investigations	\$2.0	\$2.4	\$2.2
	Privacy and Freedom of Information Act (FOIA) Program Support	\$2.2	\$1.3	\$1.3
	Technology Infrastructure	\$19.9	\$13.5	\$15.4
	Other	\$11.6	\$12.3	\$10.9
<b>ALL Total</b>		<b>\$83.5</b>	<b>\$78.2</b>	<b>\$79.2</b>
<b>Grand Total</b>		<b>\$244.2</b>	<b>\$260.9</b>	<b>\$268.6</b>

## Budget by Object Class and Program

### BUDGET BY OBJECT CLASSIFICATION (\$ IN THE MILLIONS AND ROUNDED)

<b>Object Classification</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
Personnel Compensation	\$266.3	\$281.1	\$298.3
Personnel Benefits	\$111.6	\$111.2	\$118.0

Object Classification	FY 2022	FY 2023	FY 2024
Benefits to Former Personnel	\$0.0	\$0.0	\$0.0
Travel and Transportation of Persons	\$0.9	\$8.1	\$9.7
Transportation of Things	\$0.1	\$0.7	\$0.7
Rents, Communications, and Misc. Charges	\$10.5	\$10.8	\$11.6
Printing and Reproduction	\$3.8	\$1.6	\$2.8
Other Contractual Services	\$195.2	\$208.8	\$210.9
Supplies and Materials	\$5.5	\$6.5	\$6.7
Equipment	\$26.5	\$24.3	\$26.3
Land and Structures	\$1.6	\$0.2	\$0.0
<b>Total</b>	<b>\$622.2</b>	<b>\$653.2</b>	<b>\$684.9</b>

The CFPB's budget reflects increases primarily in personnel and benefit compensation, travel, and other contractual services.

#### Personnel Compensation and Benefits

Personnel Compensation and Benefits costs increase across all programs and represent the largest cost to the CFPB. The CFPB staffing levels continue to gradually increase since the hiring freeze was lifted back in FY 2018 to ensure divisions are appropriately staffed and able to meet priorities and initiatives. Personnel compensation and benefits estimates reflect increases in hiring as the CFPB continues to reach approved staffing levels across all programs and goals.

#### Travel and Transportation of Persons

The estimated travel costs increase as the CFPB plans to eventually reinstate travel after travel restrictions were put in place in March 2020. The CFPB instituted several initiatives to ensure the health, safety, and well-being of staff during the COVID-19 pandemic. For example, the CFPB has been conducting majority of examination activity off-site, from examiners' home duty stations. As a result, travel costs significantly decreased from FY 2021 through FY 2022. Increases in travel costs in FY 2023 reflect half of pre-pandemic travel related primarily to examination travel within the Supervision, Enforcement & Fair Lending (SEFL) Division.

## Contractual Services

Increases in contractual services reflect investments to support many of the CFPB initiatives as described throughout this document. The increases are primarily within SEFL for investigation and litigation support for Enforcement matters, and the implementation of the non-bank registration system. Within the Operations program, increased investments will support IT and systems initiatives, the design and development of the Small Business Lending Program system, the continued migration to a cloud infrastructure and cloud-based solutions, and enhancements to its cybersecurity program. Lastly, within the Research, Monitoring & Regulations Division, funding will continue to maintain and expand market research and primary data collection on underserved consumers for use in a wide range of policy research projects.

### **BUDGET BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)**

<b>Division or Office</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
Office of the Director	\$23.7	\$28.8	\$31.6
Operations	\$249.7	\$251.6	\$264.1
Consumer Education & External Affairs <sup>2</sup>	\$83.8	\$70.1	\$74.7
Research, Markets & Regulation	\$55.0	\$0.0	\$0.0
Research, Monitoring & Regulations <sup>2</sup>	\$0.0	\$76.7	\$79.7
Supervision, Enforcement & Fair Lending	\$180.0	\$196.7	\$206.2
Legal	\$20.8	\$21.0	\$21.6
Other Programs <sup>3</sup>	\$4.3	\$4.2	\$4.3
Centralized Services <sup>4</sup>	\$5.0	\$4.1	\$2.7
<b>Total</b>	<b>\$622.2</b>	<b>\$653.2</b>	<b>\$684.9</b>

---

<sup>2</sup> In FY 2023, the Office of Consumer Education within Consumer Education & External Affairs Division, apart from the Financial Education program, merged into Research, Markets & Regulation to become the Research, Monitoring & Regulations Division.

<sup>3</sup> Other Programs includes Ombudsman, Administrative Law Judges, and Director's Financial Analyst program.

<sup>4</sup> Includes the cost of certain services provided centrally to other Divisions (e.g., interns and costs associated with the Office of the Inspector General) in support of all strategic goals.

#### FTE BY PROGRAM

Division or Office	FY 2022	FY 2023	FY 2024
Office of the Director	87	104	107
Operations	286	293	299
Consumer Education & External Affairs <sup>2</sup>	230	178	182
Research, Markets & Regulation	170	0	0
Research, Monitoring & Regulations <sup>2</sup>	0	243	246
Supervision, Enforcement & Fair Lending	681	707	713
Legal	74	74	74
Other Programs <sup>3</sup>	28	26	26
Centralized Services <sup>5</sup>	5	10	10
<b>Total</b>	<b>1,561</b>	<b>1,635</b>	<b>1,658</b>

More information about the CFPB organizational structure can be found at  
<https://www.consumerfinance.gov/about-us/the-bureau/bureau-structure/>.

## Bureau Fund Budget Authority

The Director of the CFPB requests the Board transfer funds in the amount that they have determined are reasonably necessary to carry out the CFPB's mission within the limits set forth in the Dodd-Frank Act. Transfers through FY 2013 were capped at pre-determined percentages of the total 2009 operating expenses of the Federal Reserve System. Including and since FY 2014, these transfer caps have been adjusted annually based on the percentage increase in the employment cost index (ECI) for the total compensation for State and local government workers, which is published by the Bureau of Labor Statistics. Transfers from the Board were capped at \$734.0 million in FY 2022 and are capped at \$750.9 million in FY 2023 and \$785.4

---

<sup>5</sup> Reflect Interns FTE in support of all strategic goals.

million in FY 2024.<sup>6</sup> Funds transferred from the Federal Reserve System are deposited into the Bureau Fund, which is maintained at the Federal Reserve Bank of New York.

The CFPB also generates additional budget authority by offsetting collections and miscellaneous revenue. For example, the Federal Financial Institutions Examination Council (FFIEC) and the Department of Housing and Urban Development (HUD) have an interagency agreement under which the CFPB now operates and manages on behalf of the Agencies<sup>7</sup> for the collection, processing, and publication of the HMDA Data. The CFPB processes the HMDA Data for the FFIEC and HUD and prepares and makes available data products to the general public. As a result, agencies reimburse the CFPB for a portion of the costs associated with operating the system on behalf of the FFIEC.

A small portion of the CFPB's budget comes from receipts collected from interest on Treasury securities as well as filing fees pursuant to the Interstate Land Sales Full Disclosure Act of 1968 (ILSA). ILSA fees are deposited into an account maintained by the Department of the Treasury and may be expended for the purpose of covering all or part of the costs that the CFPB incurs to operate the ILSA Program.

**BUREAU FUND (\$ IN THE MILLIONS AND ROUNDED)**

	FY 2022	FY 2023	FY 2024
Unobligated Balances, start of year	\$104.4	\$128.2	\$142.5
Transfers from the Federal Reserve Board	\$641.5	\$653.2	\$684.9
Other Receipts	\$1.7	\$2.0	\$2.0

---

<sup>6</sup> Per the Dodd-Frank Act, the transfer limit or “cap” is adjusted annually, using the percentage increase, if any, in the ECI for total compensation for State and local government workers published by the [Bureau of Labor Statistics](#), for the 12-month period ending on September 30 of the year preceding the transfer. As such, the FY 2023 transfer cap increased by 2.3%, while the FY 2024 transfer cap increased by 4.6%.

<sup>7</sup> The “Agencies” are defined as the federal agency members of the FFIEC: Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC), the Board of Governors of the Federal Reserve System (Board), the National Credit Union Administration (NCUA), and the Consumer Financial Protection Bureau (CFPB). Department of Housing and Urban Development (HUD) is not an FFIEC member but is part of the HMDA cost sharing Memorandum of Understanding (MOU) for HMDA data.

	FY 2022	FY 2023	FY 2024
Sequestration – Temporarily Reduced <sup>8</sup>	-\$36.7	-\$37.3	-\$39.2
Sequestration – Previously Unavailable <sup>8</sup>	\$0.0	\$36.7	\$37.3
Offsetting Collections	\$2.8	\$2.9	\$2.9
Recoveries of Prior Year Obligations	\$36.7	\$10.0	\$10.0
<b>Total Budgetary Resources</b>	<b>\$750.4</b>	<b>\$795.6</b>	<b>\$840.5</b>
<b>Total Obligations</b>	<b>\$622.2</b>	<b>\$653.2</b>	<b>\$684.9</b>
Unobligated Balances, end of year	\$128.2	\$142.5	\$155.6

## Civil Penalty Fund Budget Authority

Pursuant to the Dodd-Frank Act, the CFPB is also authorized to collect and retain civil penalties obtained from any person or entity in a judicial or administrative action for violations of federal consumer financial laws. These funds are deposited into the Consumer Financial Civil Penalty Fund (CPF), which is also maintained at the Federal Reserve Bank of New York.

The CFPB is authorized to use funds deposited in the CPF for payments to the victims of activities for which civil penalties have been imposed under Federal consumer financial laws. To the extent that victims cannot be located, or payments are otherwise not practicable, the CFPB is authorized to use such funds for consumer education and financial literacy programs.

On May 7, 2013, the CFPB published in the Federal Register the Consumer Financial Civil Penalty Fund rule, 12 CFR part 1075, a final rule governing how the CFPB will use funds in the CPF. This rule states that the Civil Penalty Fund Administrator will allocate funds to classes of eligible victims and, as appropriate, to consumer education and financial literacy programs in accordance with a schedule published by the CFPB on its website. In FY 2022, the CFPB collected \$172.5 million in civil penalties, and it has collected \$1.8 billion in FY 2023 year-to-date<sup>9</sup>.

---

<sup>8</sup> The CFPB began sequestering funds within the Bureau Fund in FY 2022. The CFPB previously accounted for sequestration by not requesting the sequestered funds from the Board. Subsequently, the Office of Management and Budget (OMB) determined that amounts in the Bureau Fund that are temporarily reduced by sequestration will become available in a subsequent fiscal year without further legislative action. The Bureau Fund's sequestration "popup" began in FY 2023 and is reflected in table above.

Additional information regarding allocations from the CPF is available at [consumerfinance.gov](https://consumerfinance.gov).

**CIVIL PENALTY FUND (\$ IN THE MILLIONS AND ROUNDED)**

	FY 2022	FY 2023	FY 2024
Unobligated Balances, start of year	\$784.2	\$853.8	\$2,236.1
Collections <sup>9</sup>	\$172.5	\$1,757.0	\$0.0
Sequestration – Temporarily Reduced	-\$9.8	-\$100.1	\$0.0
Sequestration – Previously Unavailable	\$3.5	\$9.8	\$100.1
Recoveries of Prior Year Obligations	\$8.5	\$8.5	\$0.0
<b>Total Budgetary Resources</b>	<b>\$958.9</b>	<b>\$2,529.0</b>	<b>\$2,336.2</b>
<b>Total Obligations</b>	<b>\$105.1</b>	<b>\$292.9</b>	<b>\$419.5</b>
Unobligated Balances, end of year	\$853.8	\$2,236.1	\$1,916.7

---

<sup>9</sup> The estimated collection amount listed for FY 2023 represents actual Civil Penalty Fund collections through December 31, 2022. The CFPB does not predict the outcome of future matters which may result in additional Civil Penalty Fund collections.

# Goal 1. Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers' needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination

## BUDGET BY STRATEGIC GOAL 1 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2022	FY 2023	FY 2024
Office of the Director	\$5.5	\$6.6	\$7.2
Operations	\$47.7	\$45.2	\$47.0
Consumer Education & External Affairs	\$0.0	\$0.0	\$0.0
Research, Markets & Regulation	\$25.5	\$0.0	\$0.0
Research, Monitoring & Regulations	\$0.0	\$25.6	\$27.1
Supervision, Enforcement & Fair Lending	\$180.0	\$196.7	\$206.2
Legal	\$7.2	\$7.2	\$7.5
Other Programs	\$1.7	\$1.6	\$1.6
Centralized Services	\$0.7	\$1.0	\$0.7
<b>Total</b>	<b>\$268.3</b>	<b>\$283.9</b>	<b>\$297.2</b>

The CFPB will attain its first goal by achieving the following three objectives:

**Objective 1.1:** Issue rules and guidance implementing Federal consumer financial law.

**Objective 1.2:** Supervise institutions to ensure compliance with Federal consumer financial laws.

**Objective 1.3:** Enforce Federal consumer financial laws to hold violators accountable and deter misconduct and repeat offenses.

## Objective 1.1

*Issue rules and guidance implementing Federal consumer financial law.*

**Primary objective leaders:** Research, Monitoring, & Regulations Division

## Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 1.1.

### Strategies

- Pursue an efficient, transparent, inclusive, evidence-based approach to developing or revising regulations.
- Engage in rulemaking or other activities where appropriate to respond to emerging markets and products, changes in market conditions, innovation, or market failures that present consumer harm.
- Carefully evaluate the potential benefits and costs and the racial and economic equity implications of contemplated regulations.
- Engage in rulemaking where appropriate to address outdated regulations.
- Provide financial institutions, service providers, and other entities with guidance, tools, and other resources to support implementation and compliance with consumer financial protection laws and promote diversity and inclusion best practices.
- Promulgate regulations required by statute, specifically per Dodd-Frank Act § 1071 and § 1033.

### Investments

#### **PERSONNEL**

Continue to maintain a skilled and expert staff, and to train and recruit new staff, to allow the CFPB to continue to issue high quality rules and guidance implementing Federal consumer financial laws, including fair lending and access to credit issues.

#### **SMALL BUSINESS DATA COLLECTION RULEMAKING**

Funding will be used to plan, develop, deploy, and maintain the SBL data collection system, the system by which covered financial institutions submit data to CFPB under the Dodd Frank Act, Section 1071, and associated support resources such as the online filing instruction guide. This data set will be a key resource used by financial regulators, researchers, and industry to facilitate enforcement of fair lending laws and enable creditors to identify business opportunities of women-owned, minority-owned, and small businesses.

## Performance Measures

The CFPB will assess the progress on achieving objective 1.1 through the following performance measures:

**MEASURE 1.1.1: PERCENT OF NOTICE-AND-COMMENT RULEMAKINGS COMPLETED WITHIN TWO YEARS OF ANNOUNCEMENT IN THE UNIFIED AGENDA (NEW MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>							Baseline	TBD
<b>Actual</b>							TBD	TBD

**MEASURE 1.1.2: PERCENT OF RULES WITH STATUTORY DEADLINES COMPLETED WITHIN STATUTORY OR OTHER REQUIRED DEADLINE (NEW MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>							100%	100%
<b>Actual</b>							TBD	TBD

## Progress update and future action

The CFPB continues to maintain an active rulemaking agenda, with the Office of Regulations developing regulations and interpretive guidance to implement directives contained in the CFPB's enacting legislation and the federal consumer financial laws, developing new rules to address practices identified through the CFPB's enforcement, supervision, market monitoring, research, and consumer response activities, and developing materials and participating in activities to facilitate compliance with regulatory changes and requirements. As laid out in further detail in the CFPB's fall 2022 regulatory agenda, the CFPB is currently in the pre-rule or proposed rule stage for many rulemaking actions, with six new entries listed on the fall agenda, and one final rule on the agenda scheduled for completion during FY 2023. The CFPB anticipates publishing several of the newly announced proposed rules in FY 2023 and anticipates timely finalization of the rules.

Because the two measures under Objective 1.1 are new for FY 2023, the CFPB will report out on progress under those measures in the next APP.

## Objective 1.2

*Supervise institutions to ensure compliance with Federal consumer financial laws.*

**Primary objective leader:** Supervision, Enforcement, & Fair Lending Division

## Strategies and investments

The following strategies and investments have been put in place to help the CFPB achieve objective 1.2.

### Strategies

- Acquire and analyze qualitative and quantitative information and data pertaining to consumer financial products and service markets and companies for examining for compliance with federal consumer financial laws.
- Focus supervision resources on institutions and their product lines that pose the greatest risk to consumers based on the nature of the harm, nature of the product, field and market intelligence, and the size of the institution and product line.
- Focus supervision resources on institutions and their product lines that pose the greatest risk to minority and traditionally underserved communities.
- As appropriate, share information, coordinate activity, and promote best practices with fellow supervisory agencies to ensure the most effective use of regulatory resources.
- Mitigate risks to consumers through assessing the compliance management systems of supervised institutions.
- Promote development and enhancement of tools, processes, and methods to identify potential violations and to ensure compliance with federal consumer financial laws.
- Enhance internal policies, procedures, and systems that facilitate the effectiveness of the CFPB's supervision function.

### Investments

#### **PERSONNEL**

Maintain staff to allow the CFPB to implement and enforce federal consumer financial laws consistently for both bank and non-bank consumer financial companies; investigate and take actions to address potential violations of federal consumer financial laws; oversee, manage, and prioritize the CFPB's supervisory and enforcement work; and analyze available data on the activities of providers, on the markets in which they operate, and on the risks to consumers. Maintain strong, expert staff to develop and implement financial education and community partnerships to strengthen prevention and response to elder financial exploitation.

#### **EXAMINER COMMISSIONING TRAINING PROGRAM**

The examiner commissioning program (ECP) establishes transparent criteria and a training plan that will provide all examiners the opportunity to pursue their commissioning. Successful completion of the ECP is a significant milestone in an examiner's career, signifying an

examiner's attainment of the broad-based technical expertise, knowledge, skills, and tools necessary to perform the duties of a commissioned examiner.

### **SUPERVISION AND ENFORCEMENT TRAINING & TRAVEL**

Supervision and enforcement training and travel are projected to increase by continue to support the development and delivery of training courses essential to maintaining a highly effective workforce. In addition, support anticipated upcoming travel requirements of Supervision and Enforcement, as the CFPB returns to conducting portions of events onsite at the subject entity.

### **SUPERVISION TECHNOLOGY TOOLS**

The CFPB is focused on automating data analysis, using supervision resources more efficiently, and streamlining the on-site portion of examinations in order to help improve the CFPB's ability to assess compliance with federal consumer financial laws and assess and detect risks to consumers. Supervision is in the process of modernizing its Supervision and Examination System (SES), its system of record for supervision work. The SES enables users to organize, create, track, and report information on entities, supervisory events, actions, subactions, restitutions, and payments. Scheduling, contact management, and activity updates are also included in the application.

### **NONBANK REGISTRATION**

Supervision is building a nonbank registration system to collect, organize, and perform analyses on data from nonbank entities pursuant to two proposed rulemakings: Orders rule and Contract Terms rule. The system would also include a publicly searchable database containing a subset of the data to promote transparency and broader public awareness about certain orders and contract terms being used for consumer financial products or services. The nonbank registration system will improve the CFPB's ability to identify supervised entities, risk to consumers, recidivism, and to promote compliance. The data collected through this effort will provide information that identifies market actors in areas of interest identified in the registration rules, and the resulting database will be used with other CFPB data sets to help identify connections and patterns in the marketplace.

## **Performance Measures**

The CFPB will assess the progress on achieving objective 1.2 through the following performance measures:

**MEASURE 1.2.1: NUMBER OF ALL SUPERVISORY EVENTS WITH SIGNIFICANT ACTIVITY WITH AN ON-SITE DATE OR EQUIVALENT DATE DURING THE PERIOD, INCLUDING FAIR LENDING**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		Baseline	Baseline	420	420	420	420	450
<b>Actual</b>		477	768	553	587	TBD	TBD	

**MEASURE 1.2.2: NUMBER OF FAIR LENDING SUPERVISION EVENTS OPENED DURING THE FISCAL YEAR<sup>10</sup>**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	20-35				Baseline	25	25	
<b>Actual</b>	27				37	TBD	TBD	

**MEASURE 1.2.3: PERCENT OF EXAMINATION REPORTS OR LETTERS ISSUED WITHIN THE CFPB'S ESTABLISHED TIME PERIODS FOLLOWING THE FINALIZATION OF EXAM ANALYSIS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	60%	70%	70%	70%	70%	70%	70%	80%
<b>Actual</b>	71%	45%	71%	92%	91%	89%	TBD	TBD

### Progress update and future action

The CFPB continued to implement its supervision program through expanded use of different types of supervisory events, allowing Supervision to better allocate resources to events according to the level of effort required to complete them. The exam schedule for FY 2022 was informed by strategic priorities for all areas of compliance - including fair lending - taking into account risk assessments across markets and for each institution. The CFPB expects the number of supervisory events to continue to steadily increase as Supervision continues its expansion of the use of different types of supervisory events and has increased its FY 2024 target to reflect that anticipated increase.

The CFPB also continues to focus on issuing high quality examination reports and supervisory letters in a timely manner at the conclusion of exam events. The CFPB will review and analyze

---

<sup>10</sup> This indicator (1.2.2) includes MRA follow-up reviews starting in FY 2015. In addition, this indicator counts mortgage Targeted ECOA Exams and their associated HMDA Data Integrity Exams separately as two examinations. The overall supervision activities indicator combines mortgage Targeted ECOA Exams and their associated HMDA Data Integrity Exam as a single examination.

its processes to determine methods for improvement and increased effectiveness and efficiency. The CFPB intends to remain transparent about the goals of its supervision program and the steps being taken to achieve those goals, while protecting the confidentiality of the underlying financial institution-specific information. As a result of consistent high performance in this area, the CFPB is increasing its FY 2024 timeliness target.

## Objective 1.3

*Enforce federal consumer financial laws to hold violators accountable and deter misconduct and repeat offenses.*

**Primary objective leader:** Supervision, Enforcement, & Fair Lending Division

## Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 1.3.

### Strategies

- Focus enforcement resources on entities and individuals to best ensure the CFPB's enforcement function effectively protects consumers, prevents harm, and is applied consistently, including:
  - Addressing unlawful conduct by large or dominant market actors;
  - Addressing repeat offenders, obtaining remedies that effectively deter unlawful conduct, and ensuring compliance with orders the CFPB obtains or issues;
  - Addressing unlawful conduct that affects minority and traditionally underserved communities; and
  - Addressing unlawful conduct in emerging markets and products and stemming from evolving reliance on technology, automation, and data.
- As appropriate, share information, coordinate activity, and promote best practices with fellow government agencies to ensure the most effective use of enforcement resources.
- Promote development and enhancement of technology, tools, processes, and methods to identify potential violations and to ensure compliance with Federal consumer financial laws.
- Enhance internal policies, procedures, and systems that facilitate the effectiveness of the CFPB's enforcement function.

## **Investments**

### **PERSONNEL**

Maintain staff to allow the CFPB to timely investigate and take actions to address potential violations of Federal consumer financial laws; oversee, manage, and prioritize the CFPB’s enforcement work; and effectively support ongoing investigatory and litigation work.

### **ENFORCEMENT KNOWLEDGE/MATTER MANAGEMENT**

Maintain and improve the CFPB’s enforcement matter management system—ENForce—which stores the Office of Enforcement’s matter-related information, enabling the CFPB to better track and report on its enforcement work.

### **INVESTIGATION AND LITIGATION SUPPORT**

Employ standard investigatory tools to compel documents and testimony and to seek injunctive and monetary remedies through civil actions or administrative proceedings. These functions require the use of services such as expert witnesses, court reporters, and transcription services. Continue to maintain and improve systems and procedures for supporting the CFPB’s enforcement work, including managing its procurement work underlying litigation support services such as expert witnesses, court reporters, and transcription services.

## **Performance Measures**

The CFPB will assess the progress on achieving objective 1.3 through the following performance measures:

### **MEASURE 1.3.1: PERCENT OF INVESTIGATIVE INFORMATION SHARED WITH PARTNERS WITHIN 30 DAYS, ONCE INFORMATION SHARING IS APPROVED BY LEGAL/SEFL FRONT OFFICE**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>			90%	90%	90%	90%	90%	90%
<b>Actual</b>			98% <sup>11</sup>	100%	89%	100%	TBD	TBD

### **MEASURE 1.3.2: PERCENTAGE OF ENFORCEMENT ACTIONS FILED OR SETTLED WITHIN TWO YEARS OF THE INVESTIGATION OPENING**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	65%	65%	65%	65%	65%	65%	65%	65%

<sup>11</sup> This measure includes information collected in the last two quarters of FY 2019.

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Actual</b>	60%	62%	36%	56%	38%	32%	TBD	TBD

**MEASURE 1.3.3: AVERAGE DURATION, IN MONTHS, TO FILE OR SETTLE INVESTIGATIONS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	N/A	24	24	24	24	24	24	24
<b>Actual</b>	23	26	32	29	31	34	TBD	TBD

**MEASURE 1.3.4: TOTAL AMOUNT OF CONSUMER RELIEF ORDERED AS A RESULT OF PUBLIC ENFORCEMENT ACTIONS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>					No Target	No Target	No Target	No Target
<b>Actual</b>					\$968M	\$499M	TBD	TBD

**MEASURE 1.3.5: TOTAL AMOUNT OF CIVIL MONEY PENALTIES ORDERED AS A RESULT OF PUBLIC ENFORCEMENT ACTIONS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>					No Target	No Target	No Target	No Target
<b>Actual</b>					\$251M	\$265M	TBD	TBD

**MEASURE 1.3.6: PERCENTAGE OF ALL CASES, INCLUDING FAIR LENDING, CONCLUDED BY THE CFPB'S ENFORCEMENT PERSONNEL THAT WERE SUCCESSFULLY RESOLVED THROUGH LITIGATION, A SETTLEMENT, OR ISSUANCE OF A DEFAULT JUDGEMENT**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		N/A	75%	75%	75%	75%	75%	75%
<b>Actual</b>		88%	100%	100%	100%	100%	TBD	TBD

**MEASURE 1.3.7: PERCENTAGE OF ALL FAIR LENDING CASES CONCLUDED BY THE CFPB THAT WERE SUCCESSFULLY RESOLVED THROUGH LITIGATION, A SETTLEMENT, ISSUANCE OF A DEFAULT JUDGEMENT, OR OTHER MEANS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	75%					75%	75%	75%
<b>Actual</b>	100%					100%	TBD	TBD

### Progress update and future action

During FY 2022, the CFPB initiated 19 public enforcement actions and concluded seven previously filed public enforcement actions through litigation, a settlement, or a default judgment.

The CFPB also published the approximate total amount of ordered consumer relief resulting from public enforcement actions as well as the total amount of ordered civil money penalties. Publishing these totals allows the public to track these amounts on an annual basis more readily.

Timely initiation of a public enforcement action better enables the CFPB to stop potentially unlawful conduct and redress harmed consumers more quickly. This fiscal year, the CFPB declined in measures 1.3.2 and 1.3.3. In large part, these measures were missed due to the cumulative effect of COVID-19 and multiple transitions in leadership. The CFPB recently implemented reviews of each matter at regular intervals to ensure enforcement is progressing in a timely manner to aid in improving on these timeframes in upcoming years.

## Goal 2: Empower consumers to live better financial lives, focusing on traditionally underserved people

### BUDGET BY STRATEGIC GOAL 2 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2022	FY 2023	FY 2024
Office of the Director	\$10.0	\$12.2	\$13.1
Operations	\$12.1	\$11.9	\$12.4
Consumer Education & External Affairs	\$58.2	\$54.0	\$57.5
Research, Markets & Regulation	\$5.7	\$0.0	\$0.0
Research, Monitoring & Regulations	\$0.0	\$10.6	\$11.6
Supervision, Enforcement & Fair Lending	\$0.0	\$0.0	\$0.0
Legal	\$0.2	\$0.2	\$0.2
Other Programs	\$0.1	\$0.1	\$0.1
Centralized Services	\$0.9	\$0.6	\$0.4
<b>Total</b>	<b>\$87.3</b>	<b>\$89.7</b>	<b>\$95.3</b>

The CFPB will attain its second goal by achieving the following three objectives:

**Objective 2.1:** Engage with consumers, directly and through trusted partners, to provide information, guidance, and technical assistance regarding consumer financial products and services.

**Objective 2.2:** Collect consumers' inquiries and complaints, and work to ensure companies offering consumer financial products and services provide responses to consumers' complaints.

**Objective 2.3:** Expand the CFPB's reach and build relationships with external stakeholders and government partners to amplify relevant tools, messages, and resources.

### Objective 2.1

*Engage with consumers, directly and through trusted partners, to provide information, guidance, and technical assistance regarding consumer financial products and services.*

**Primary objective leaders:** Consumer Education & External Affairs Division

# Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 2.1.

## Strategies

- Expand and diversify CFPB's reach nationwide through a data-driven process using economic activity, markets, experiences of historically underserved populations, and policy initiatives.
- Implement a targeted public engagement and outreach strategy to tribal, rural, limited English proficient, and other underserved communities to build awareness of the CFPB's mission, tools, and resources to drive better outcomes to the American people.
- Identify new opportunities to improve consumer knowledge, financial capability, and access to products and services through consumer education and engagement, policy changes, and implementation of effective practices.

## Investments

### PERSONNEL

Maintain adequate capacity to preserve partnerships and continue engaging stakeholders in advancement of the CFPB's goals and objectives.

### FINANCIAL EDUCATION INITIATIVES

The focus of financial education in FY 2023 will be to help consumers understand and assert their rights, avoid pitfalls, and take action when faced with financial difficulties. The CFPB strives to be a source for objective information and, where appropriate, seeks partnerships that can provide neutral and unbiased financial education programs. We continue to highlight our financial well-being research, with the five principles of effective financial education<sup>12</sup> that together offer a holistic framework for the wide variety of financial education strategies aimed at boosting financial well-being for adults. The principles are described below and are currently being refined with additional empirical data.

- *Know the individuals and families to be served.* Financial education programs can be more effective if they are matched to people's specific circumstances, challenges, and goals.

---

<sup>12</sup> [Effective financial education: Five principles and how to use them, CFPB, June 2017.](#)

- *Provide actionable, relevant, and timely information.* People are more likely to absorb information if it is connected to an upcoming decision that matters to them, at the time when they can put it to use, and with concrete steps that they can follow.
- *Improve key financial skills.* Key skills include knowing when and how to find reliable information to make financial decisions, how to process the information, and how to follow through.
- *Build on motivation.* Financial education can help people to strengthen the qualities and attitudes that allow them to remain motivated.
- *Make it easy to make good decisions and take action.* The situations that people encounter can strongly influence their actions. Effective financial education helps people to follow through on their intentions by working with the influences or forces at play within their lives.

## Performance Measures

The CFPB will assess the progress on achieving objective 2.1 through the following performance measures:

**MEASURE 2.1.1: NUMBER OF OFFICE OF STAKEHOLDER MANAGEMENT (OSM)-FACILITATED ENGAGEMENTS FOR CFPB OFFICIALS AND EXTERNAL STAKEHOLDERS (E.G., ROUNDTABLES, LISTENING SESSIONS, SITE VISITS, AND SPEECHES)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target		12	25	25	25	25	25	25
Actual		267	41	47	55	TBD	TBD	

**MEASURE 2.1.2: NUMBER OF HEARINGS/TOWN HALLS ORGANIZED BETWEEN CFPB OFFICIALS AND THE PUBLIC**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target		4	4	3	3	3	3	3
Actual		4	5	4	3	TBD	TBD	

**MEASURE 2.1.3: PERCENT INCREASE IN FOLLOWERS ACROSS ALL OF THE CFPB'S SOCIAL MEDIA CHANNELS (NEW MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>							5%	5%
<b>Actual</b>							TBD	TBD

**MEASURE 2.1.4: NUMBER OF PEOPLE WHO USE THE CFPB'S EDUCATIONAL RESOURCES ON WEB AND IN PRINT**

	FY 2017	FY 2018	FY 2019	FY 2020 <sup>13</sup>	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	N/A	8.7M	8.0M	9.0M	10.0M	10.0M	12.0M	12.5M
<b>Actual</b>	15.5M	9.9M	12.3M	16.1M	19.1M	21.5M	TBD	TBD

### Progress update and future action

The CFPB continues to work to reach stakeholders in diverse geographic locations and engage them in different formats. The CFPB continues to achieve excellent outreach by collaborating closely within the agency and with external partners to inform the CFPB's initiatives and maximize the impact of the CFPB's resources on the public.

## Objective 2.2

*Collect consumers' inquiries and complaints, and work to ensure companies offering consumer financial products and services provide responses to consumers' complaints.*

**Primary objective leader:** Consumer Education & External Affairs Division

### Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 2.2.

---

<sup>13</sup> Measure updated to incorporate web users of COVID-19 response resources into total count of web users accessing consumer educational resources. In the fiscal year 2020 report, the web users accessing COVID-19 response resources were reported separately.

## Strategies

- Answer consumers' questions about consumer financial products and services and provide updates on their complaints.
- Support timely responses to consumers' complaints by efficiently sending complaints to companies.

## Investments

### PERSONNEL

Maintain sufficient levels of expert staff to answer questions, handle and investigate complaints, and analyze and share data to inform the marketplace and empower consumers to take more control over their financial lives.

### CONSUMER RESPONSE COMPLAINT INTAKE, HANDLING, AND ANALYTICS

Collect, investigate, respond to, and analyze consumer complaints. Provide secure portals for consumers to track the status of their complaints; for companies to provide responses to complaints; and for other government partners to review complaint information. Enhance the tools used to analyze consumer complaints and company responses to assess the accuracy, timeliness, and completeness of company responses; and to inform the CFPB's primary tools of supervision, rulemaking, education, and enforcement.

### CONSUMER RESPONSE CONTACT CENTER

Operate a statutorily mandated toll-free number to answer consumers' questions and intake consumer complaints. Process, route, and respond to consumer correspondence. Due to the COVID-19 pandemic, the Consumer Resource Centers in Kentucky and Texas remained in 100% telework status in FY 2022.

## Performance Measures

The CFPB will assess the progress on achieving objective 2.2 through the following performance measures:

### MEASURE 2.2.1: PERCENTAGE OF CONSUMERS SATISFIED WITH TELEPHONE EXPERIENCE

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target		Baseline	90%	90%	90%	90%	90%	90%
Actual		91.7%	91%	92%	92%	94.5%	TBD	TBD

#### **MEASURE 2.2.2: NUMBER OF DAYS TO ROUTE COMPLAINTS TO COMPANY**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	2 days							
<b>Actual</b>	<1 day	<1 day	1 day	1 day	<1 day	<1 day	TBD	TBD

#### **MEASURE 2.2.3: PERCENTAGE OF COMPANY RESPONSES THAT ARE TIMELY**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		97%	97%	97%	97%	97%	97%	98%
<b>Actual</b>		99%	99%	99%	99%	99%	TBD	TBD

#### **MEASURE 2.2.4: PERCENT OF COMPANIES ANALYZED ON RESPONSE PERFORMANCE (ABOVE THRESHOLD)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		78%	82%	83%	85%	85%	85%	85%
<b>Actual</b>		90%	100%	98%	97%	95.6%	TBD	TBD

### **Progress update and future action**

The CFPB answers consumer questions about consumer financial products and services, as well as provides updates about complaints, by telephone. The CFPB's Office of Consumer Response measures consumers' satisfaction with their telephone experiences with the contact center. In FY 2022, 94.5% of respondents rated their experience with the contact center as satisfactory.

The CFPB supports timely response to consumer complaints by efficiently sending complaints to companies through a secure, web-based company portal. The CFPB uses this portal to route complaints to companies for review and response to protect consumer and company privacy. The portal includes a user-friendly interface that allows companies to receive, review, and respond to consumer complaints, and to access and analyze data associated with those complaints. Consumer Response reports the percentage of complaints that receive a timely response when routed through the company portal. In FY 2022, 99% of complaints routed to companies through the company portal received a timely response.

Analyzing consumer complaints helps the CFPB to regulate consumer financial products and services under existing federal consumer financial laws, enforce those laws judiciously, and educate consumers. Consumer Response's monitoring and analysis of complaints inform the

CFPB's use of its primary tools – education, regulation, supervision, and enforcement. Complaints play an integral role in how the CFPB uses its tools and provide transparency for the marketplace through the public Consumer Complaint Database. In 2022, the CFPB continued to support the data visualization and trend analytics tools to the database, making it easier for consumers, researchers, advocates, and other stakeholders, including financial companies, to explore the data at a glance in a clearer and more powerful interface.

## Objective 2.3

*Expand the CFPB's reach and build relationships with external stakeholders and government partners to amplify relevant tools, messages, and resources.*

**Primary objective leaders:** Consumer Education & External Affairs Division, Operations Division, Office of Fair Lending & Equal Opportunity, and Office of Minority & Women Inclusion

## Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 2.3.

### Strategies

- Enhance outreach and engagement with historically underserved communities and their intermediaries with the CFPB's policies and resources to improve their financial wellbeing.
- Broaden and enhance outreach to intergovernmental partners on the CFPB's mission, objectives, and programs.
- Engage diverse external stakeholders, improve operational functions, and consumer-facing tools to anticipate and overcome barriers to an equitable financial recovery to achieve an inclusive and sustainable financial marketplace.
- Develop relationships with government agencies, private industry, fair lending, civil rights, and consumer and community advocates, and academics, to promote fair lending compliance and education and hear their views to inform the CFPB's policy development, including on redlining, algorithmic bias, home appraisals, limited English proficiency, and Special Purpose Credit Programs.
- Engage diverse contractors to increase opportunities and participation of minority- and women-owned businesses in CFPB programs and contracts.

## **Investments**

### **PERSONNEL**

Continue to maintain staff to allow the CFPB to develop relationships with government agencies, private industry, fair lending, civil rights, and consumer and community advocates, academics, to promote fair lending compliance and education and to hear their views to inform the CFPB's policy decisions.

Maintain experienced, expert staff to develop and implement financial education programs, consumer engagement, and community, industry, advisory, and government partnerships. Maintain sufficient levels of expert staff to answer questions, handle and investigate complaints, and analyze and share data to inform the marketplace and empower consumers to take more control over their financial lives.

### **FINANCIAL EDUCATION RESEARCH AND TOOLS FOR FINANCIAL EDUCATORS OF ADULTS AND YOUTH**

The principal aim of financial education is to improve financial well-being. The CFPB develops and shares information and tools to amplify the reach and effectiveness of financial education for adults and children which helps more consumers achieve or improve their financial well-being. The CFPB conducts research to understand what financial well-being is, how to measure it, and how financial education can effectively support it. The CFPB also contributes to the infrastructure for effective financial education by providing financial educators with research, analysis, and tools for understanding and measuring financial well-being, and implementing effective practices in adult financial education.

For youth financial education, the CFPB seeks to empower families and school systems to build financial skills for the next generation. The CFPB builds the capacity of educators to deliver high quality financial education by providing updated classroom activities for elementary, middle, and high school which align with national youth financial education standards. The CFPB also provides information, activities, and conversation starters for parents and caregivers who want to help their children develop financial capability skills through the *Money as You Grow*, *Money as You Grow* bookshelf, and *Money Monster* book series.

### **LANGUAGE ACCESS PROGRAM**

Limited English proficient (LEP) consumers often encounter significant barriers to participating in the consumer financial marketplace, including completing key financial documents, managing bank accounts, resolving problems with financial products, and accessing financial education. This makes it difficult for LEP consumers to conduct everyday financial affairs and makes them more vulnerable to deceptive products or predatory actors. One of the CFPB's goals is to give consumers practical and actionable information to improve their decision-making in pursuit of their own financial goals. For the LEP community, this includes access to consumer

financial education materials in consumers' native languages. To this end, the CFPB conducted in language focus groups, user testing, and practitioner interviews to gather feedback on improving access to the CFPB's digital resources and materials in Arabic, Chinese, Haitian Cr  ole, Korean, Russian, Spanish, Tagalog, and Vietnamese. Through this consumer experience gathering, the CFPB will update our in language home pages as well as expand additional translated resources.

## Performance Measures

The CFPB will assess the progress on achieving objective 2.3 through the following performance measures:

**MEASURE 2.3.1: NUMBER OF NEW COLLABORATIONS AND PARTNERSHIPS ESTABLISHED WITH THE CFPB**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		2	3	3	3	100	100	
<b>Actual</b>		2	6	104	197	TBD	TBD	

**MEASURE 2.3.2: NUMBER OF OUTREACH EVENTS WHERE THE CFPB STAFF WORK DIRECTLY WITH EXTERNAL STAKEHOLDERS TO (1) PROMOTE FAIR LENDING COMPLIANCE AND ENSURE FAIR, EQUITABLE, AND NON-DISCRIMINATORY ACCESS TO CREDIT AND/ OR (2) HEAR THEIR VIEWS ON THE CFPB'S WORK TO INFORM THE CFPB'S POLICY DECISIONS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	40	40	40	40	40	50	50	50
<b>Actual</b>	60	24	63	96	267	128	TBD	TBD

**MEASURE 2.3.3: PERCENT OF THE CFPB'S TOTAL CONTRACTING SPEND PAID TO MINORITY- AND WOMEN-OWNED BUSINESSES (NEW APP MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>						12.8%	30%	35%
<b>Actual</b>						35%	TBD	TBD

## Progress update and future action

The CFPB works consistently to comply with the requirements under the Federal Advisory Committee Act and continues to accomplish its reporting goals. The CFPB embraces the need to

expand outreach efforts to reach underserved communities and in diverse geographic locations and collaborates closely with the CFPB's other offices and external stakeholders to fulfill this objective. Additionally, the CFPB continues to reach new stakeholders that the CFPB has not previously engaged with on important topics as appropriate, including fair, equitable and nondiscriminatory access to credit for consumers and communities.

The Office of Minority and Women Inclusion (OMWI) and the Office of Procurement will continue co-hosting technical assistance events to increase participation opportunities for MWOBs and promote CFPB's upcoming contractual needs. During these outreach events procurement and program office professionals actively engage current and potential MWOBs by providing expert advice on procurement matters. CFPB's efforts to advance economic equity has resulted in steady increases in the percentage of dollars spent among MWOBs. Since 2017 growth has trended upwards from 17% to 35% in 2022. OMWI and the Office of Procurement will continue to monitor the CFPB's progress and promote supplier diversity to internal stakeholders.

## Goal 3: Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services

### BUDGET BY STRATEGIC GOAL 3 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2022	FY 2023	FY 2024
Office of the Director	\$1.0	\$1.5	\$1.7
Operations	\$19.1	\$23.4	\$24.7
Consumer Education & External Affairs	\$25.6	\$16.2	\$17.2
Research, Markets & Regulation	\$23.7	\$0.0	\$0.0
Research, Monitoring & Regulations	\$0.0	\$40.5	\$41.0
Supervision, Enforcement & Fair Lending	\$0.0	\$0.0	\$0.0
Legal	\$0.7	\$0.7	\$0.7
Other Programs	\$0.7	\$0.7	\$0.7
Centralized Services	\$0.4	\$0.5	\$0.3
<b>Total</b>	<b>\$71.1</b>	<b>\$83.3</b>	<b>\$86.2</b>

The CFPB will attain its third goal by achieving the following two objectives:

**Objective 3.1:** Monitor consumer financial markets to surface relevant trends and identify areas of risk to consumers.

**Objective 3.2:** Conduct and publish research focused on: (a) experiences of underserved communities and their access to credit, (b) consumer awareness, understanding, and behavior with respect to consumer financial products and services and with respect to disclosures and related communications, and (c) market developments impacting consumers, including competition and innovation.

### Objective 3.1

*Monitor consumer financial markets to surface relevant trends and identify areas of risk to consumers.*

**Primary objective leader:** Research, Monitoring & Regulations Division

# Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 3.1.

## Strategies

- Effectively monitor consumer financial markets for risks to consumers.
- Acquire, collect, and maintain the data and other intelligence necessary to effectively monitor markets for risks to consumers.
- Ensure CFPB policy development and other functions are informed by the latest market developments and trends.
- Amplify the experiences of consumers in support of the CFPB's policy development; understand special populations' challenges in the financial marketplace; and integrate consumer experiences into our monitoring and risk identification.
- Analyze consumer complaints and share data and insights to identify areas of risk to consumers.

## Investments

### **PERSONNEL**

Maintain strong, experienced staff with the expertise necessary to monitor developments in consumer financial markets and with consumers in special populations and to gather market intelligence from industry and consumers. Maintain staff who develop and implement policy that seeks to influence consumer financial market practices.

### **CONSUMER EXPERIENCE PROGRAM**

Gather and integrate insights about consumers' experiences in the financial marketplace into all aspects of the CFPB's work. These insights will inform priority initiatives, identify emerging trends, and build foundational knowledge. A deeper understanding of consumers' experiences helps the CFPB's education, supervision, enforcement, and rulemaking work to better achieve the CFPB's goals. Identify policy and structural changes to remove barriers; improve access, delivery, and safety of financial services; and support and advance key CFPB priorities to serve diverse and underserved consumers.

### **HMDA OPERATIONS**

Continue to develop, maintain, and improve the HMDA Platform, the system by which financial institutions submit data to the CFPB under the HMDA. This data set is a key resource used by financial regulators, researchers, consumer advocates, and industry. The CFPB administers the HMDA Platform on behalf of the FFIEC.

## **OTHER MARKET DATA**

Invest in commercially available data and gather data from other sources. Analyses from these data resources are foundational to the CFPB's policy work and also contribute to evidence-based market research Primary Data Collection.

## **SMALL BUSINESS LENDING PROGRAM**

Funding will be used to plan, develop, deploy, and maintain the SBL Data Collection System, the system by which covered financial institutions submit data to the CFPB under the Dodd Frank Act, Section 1071, and associated supporting resources such as the online filing instruction guide. This data set will be a key resource used by financial regulators, researchers, and industry to facilitate enforcement of fair lending laws and enable creditors to identify business opportunities for women-owned, minority-owned, and small businesses.

## **SPECIAL POPULATIONS PROGRAMS**

Invest in projects that focus on the unique experiences and needs of special populations and implement strategies to help build their financial well-being. These populations include traditionally underserved consumers and those with low-income, young adults, older consumers, servicemembers, and veterans. In this work, the CFPB engages stakeholders to understand emerging challenges and barriers faced by consumers within these population groups and develop efforts to leverage CFPB tools to address those barriers. The CFPB also shares research and promising, evidence-based practices for effective financial education to build financial capability with service providers in the field.

## **Performance Measures**

The CFPB will assess the progress on achieving objective 3.1 through the following performance measures:

### **MEASURE 3.1.1: NUMBER OF REPORTS, ISSUE BRIEFS, ADVISORIES, OR OTHER ACTIONS THAT INFLUENCE POLICY AND CONSUMER FINANCIAL MARKET PRACTICES (NEW MEASURE FOR FY 2023)**

	<b>FY 2017</b>	<b>FY 2018</b>	<b>FY 2019</b>	<b>FY 2020</b>	<b>FY 2021</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
<b>Target</b>							Baseline	TBD
<b>Actual</b>							TBD	TBD

**MEASURE 3.1.2: MONTHLY AVERAGE NUMBER OF EXTERNAL ENGAGEMENTS FOCUSED ON COMPETITION OR EMERGING CONSUMER MARKET TRENDS (NEW MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>							Baseline	TBD
<b>Actual</b>							TBD	TBD

### Progress update and future action

The Market Offices, within the Research, Monitoring, & Regulations (RMR) Division, undertake frequent market monitoring activities, including regular engagement with industry stakeholders, data analysis, and research. The Market Offices – Mortgage Markets; Consumer Credit, Payments, and Deposits; and Small Business Lending – each have an Assistant Director with executive experience in consumer financial markets. Across the three offices there are Program Managers or senior staff, each covering a distinct consumer financial market or market segment.

Market monitoring functions currently cover the following products and services:

- Artificial Intelligence and Machine Learning in Financial Services
- Auto Servicing and Originations
- Buy Now Pay Later
- Credit Card Origination and Servicing
- Consumer Reporting
- Consumer Data & Aggregation
- Cryptocurrency
- Debt Collection
- Debt Relief
- Deposits, Prepaid, & Payments (including Cryptocurrency)
- Money Services and Remittances
- Mortgage Servicing and Origination
- Small Business Lending
- Small Dollar and Installment Lending (including Buy Now Pay Later)
- Student Loan Servicing and Originations

The Consumer Populations Offices, also within the RMR Division, focus on the unique experiences and needs of special populations. These populations include traditionally underserved consumers and those with low-income, young adults, older adults, servicemembers, and veterans.

During FY 2022, the CFPB published reports, issue briefs, advisories, or took other action across a variety of markets and affected consumer populations. In FY 2023, the CFPB will introduce a measure to count those actions that influence policy and consumer financial market practices.

## Objective 3.2

*Conduct and publish research focused on: (a) experiences of underserved communities and their access to credit, (b) consumer awareness, understanding, and behavior with respect to consumer financial products and services and with respect to disclosures and related communications, and (c) market developments impacting consumers, including competition and innovation.*

**Primary objective leader:** Research, Monitoring, & Regulations Division

### Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 3.2.

#### Strategies

- Research, analyze, and report on developments in markets for consumer financial products and services that apply to and contribute directly to policies that promote consumer and household financial well-being for all.
- Collect and disseminate data to inform research and improve understanding of consumer finances.
- Research inclusion and financial security challenges and barriers of servicemembers, older Americans, students, and traditionally underserved consumers and communities.

#### Investments

##### PERSONNEL

Maintain the capacity to conduct rulemaking activities, provide interpretive guidance, publish regulatory implementation materials, issue advisory opinions, and provide industry with other implementation support; maintain the expertise necessary to monitor developments and trends in consumer financial markets; maintain expertise to develop and implement special population policy and research activities; maintain the staff levels necessary to advance a robust innovation agenda across multiple avenues; and employ economists and other researchers to conduct benefit-cost analysis and other policy-relevant research.

## NATIONAL MORTGAGE DATABASE

Use the National Mortgage Database, a comprehensive repository of detailed mortgage loan information, to support the agencies' policymaking and research efforts, and to help regulators and the mortgage industry better understand emerging mortgage and housing market trends. It is a joint project with the Federal Housing Finance Agency (FHFA).

## PRIMARY DATA COLLECTION

Conduct primary data collections through field tests, controlled trials in laboratory settings, and surveys to inform policymaking and build foundational knowledge about how consumers make financial decisions.

## Performance Measures

The CFPB will assess the progress on achieving objective 3.2 through the following performance measures:

### MEASURE 3.2.1: NUMBER OF PUBLISHED RESEARCH PRODUCTS

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	6	6	7	10	10	15	18	18
<b>Actual</b>	6	10	13	17	24	25	TBD	TBD

### MEASURE 3.2.2: NUMBER OF CITATIONS OF CFPB RESEARCH PRODUCTS IN OTHER PUBLICATIONS

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		Baseline	75	140	160	350	400	400
<b>Actual</b>		73	121	214	353	364	TBD	TBD

### MEASURE 3.2.3: NUMBER OF NEW DATA SERIES OR SETS RELEASED

	FY 2015	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		1	1	1	1	1	1	1
<b>Actual</b>		2	3	2	0	0	TBD	TBD

## Progress update and future action

The CFPB conducts research on consumer decision-making, consumer financial products and markets, and the effects of consumer financial regulations and policies. Publishing research

products is central to the CFPB's mission and the CFPB is statutorily required to research, analyze, and report on six topic areas related to consumer finance<sup>14</sup>:

- Developments in markets for consumer financial products or services, including market areas of alternative consumer financial products or services with high growth rates and areas of risk to consumers;
- Access to fair and affordable credit for traditionally underserved communities;
- Consumer awareness, understanding, and use of disclosures and communications regarding consumer financial products or services;
- Consumer awareness and understanding of costs, risks, and benefits of consumer financial products or services;
- Consumer behavior with respect to consumer financial products or services, including performance on mortgage loans; and
- Experiences of traditionally underserved consumers, including un-banked and under-banked consumers.

In FY 2022, CFPB published the following research:

- Disputes on Consumer Credit Reports (November 2, 2021)
- Data Point: Checking Account Overdraft at Financial Institutions Served by Core Processors (December 1, 2021)
- Data Point: Overdraft/Non-sufficient funds (NSF) Fee Reliance Since 2015 – Evidence from Bank Call Reports (December 1, 2021)
- Consumer finances during the pandemic: Insights from the Making Ends Meet Survey (December 21, 2021)
- Emergency Savings and Financial Security: Insights from the Making Ends Meet Survey and Consumer Credit Panel (March 23, 2022)
- New Data on the Characteristics of Mortgage Borrowers During the COVID-19 Pandemic (March 23, 2022)
- Credit Card Late Fees (March 29, 2022)
- Student Loan Borrowers Potentially At-Risk when Payment Suspension Ends (April 14, 2022)
- Banks' overdraft/NSF fee revenues evolve along with their policies (July 20, 2022)
- Paid and Low-Balance Medical Collections on Consumer Credit Reports (July 27, 2022)
- Office of Research blog: Housing inflation is hitting low-income renters (July 27, 2022)
- Understanding Required Financial Assistance in Medical Care (July 28, 2022)

---

<sup>14</sup> As set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203 (2010), Dodd-Frank 1013(b).

- Exploring the connection between financial assistance for medical care and medical collections (August 24, 2022)
- Consumer Finances in Rural Appalachia (September 1, 2022)
- Data Point: 2021 Mortgage Market Activity and Trends (September 19, 2022)

In addition to the reports listed above, CFPB published a series of research blogs during FY 2022.

On an ongoing basis, the CFPB releases data to the public, including updates to existing data resources and new data sets. Below are examples of the CFPB's ongoing data releases.

- HMDA requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help show whether lenders are serving the housing needs of their communities; give public officials information that helps them make decisions and policies; and shed light on potential discriminatory lending patterns. The public data are modified to protect applicant and borrower privacy. On behalf of the FFIEC, the CFPB makes certain HMDA data available to the public and publishes various online tools for users to explore the data. HMDA data are the most comprehensive source of publicly available information on the U.S. mortgage market.
- Quarterly updates to the National Survey of Mortgage Origination (NSMO).
- The CFPB also makes available databases about credit cards, including general credit card agreements and college credit card marketing agreements, and credit card terms through the Terms of Credit Card Plans (TCCP) survey. In FY 2023, CFPB is planning to improve the survey to include more granular information about credit card interest rates. The CFPB's existing credit card resources include:
  - A database of credit card agreements from more than 600 card issuers.
  - Credit card issuers marketing agreements with universities, colleges, or affiliated organizations such as alumni associations, sororities, fraternities, and foundations.
  - A survey of the terms of credit card plans offered by 150 financial institutions.

## Goal 4: Foster operational excellence and further commitment to workforce equity to advance the CFPB's mission

BUDGET BY STRATEGIC GOAL 4 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2022	FY 2023	FY 2024
Office of the Director	\$7.2	\$8.5	\$9.7
Operations	\$170.8	\$171.1	\$180.1
Consumer Education & External Affairs	\$0.0	\$0.0	\$0.0
Research, Markets & Regulation	\$0.0	\$0.0	\$0.0
Research, Monitoring & Regulations	\$0.0	\$0.0	\$0.0
Supervision, Enforcement & Fair Lending	\$0.0	\$0.0	\$0.0
Legal	\$12.7	\$12.8	\$13.2
Other Programs	\$1.8	\$1.8	\$1.9
Centralized Services	\$3.0	\$2.0	\$1.4
<b>Total</b>	<b>\$195.5</b>	<b>\$196.3</b>	<b>\$206.2</b>

The Operations Division has worked to build an infrastructure that supports execution of the CFPB's mission to make consumer financial markets work for consumers, responsible providers, and the economy as a whole. The CFPB has implemented and adopted policies, processes, tools, and controls to operate more efficiently, effectively, and transparently, while remaining nimble to adapt to a continually changing environment. The CFPB will attain its fourth goal by achieving the following three objectives:

**Objective 4.1:** Cultivate an engaged and informed workforce to maximize talent and development in alignment with the CFPB's mission.

**Objective 4.2:** Define and implement a modern, forward-leaning workplace model that is responsive to the CFPB's organizational needs.

**Objective 4.3:** Advance the work of the CFPB through innovative and optimized operational support.

# Objective 4.1

*Cultivate an engaged and informed workforce to maximize talent and development in alignment with the CFPB's mission.*

**Primary objective leaders:** Operations Division, Legal Division, Office of Minority & Women Inclusion, and Office of Civil Rights

## Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 4.1.

### Strategies

- Reinforce human capital policies and programs to help the agency effectively and efficiently manage a talented, engaged, diverse, and inclusive workforce.
- Analyze and mature our learning and development opportunities to develop the new skills, leadership traits, and professional growth required for a modern workforce.
- Foster a positive, innovative work environment that promotes diversity, equity, integrity, inclusion, equality, accessibility, fairness, and trust for all employees.
- Review and redesign the skills and values we want in the CFPB's employees and enhance our services to enable them to do their best work.
- Maintain comprehensive equal employment opportunity (EEO) and DEIA programs.

### Investments

#### **PERSONNEL**

Continue human capital investments as part of an integrated approach that builds upon a human capital strategy to:

- Foster a hybrid work environment of creativity, collaboration, and empowerment;
- Reduce turnover and include opportunities for growth, achievement, and security;
- Promote employee development through cooperative leadership efforts, increase employee engagement, and improve knowledge, skills, and expertise; and
- Foster a culture of diversity, equity, inclusion, and accessibility.

#### **HUMAN CAPITAL SHARED SERVICES, INFRASTRUCTURE, AND OPERATIONS**

Provide a variety of support services, including pay and leave administration; employee benefits administration and support; time and attendance; personnel documentation; and performance management systems.

## **LEARNING, LEADERSHIP, AND ORGANIZATION DEVELOPMENT FACILITATION AND DESIGN**

Investments will be made to assist the Office of Human Capital (OHC) in designing new programs to close skill gaps and increase developmental opportunities, as well as increase managerial acumen and enhance succession readiness. OHC will design a new learning and development program for non-supervisory team members with an interest in developing skills necessary to become competitive for new supervisory job opportunities.

## **STAFFING, RECRUITMENT, AND COMPENSATION INITIATIVES**

Invest in traditional and digital outreach, sourcing, recruiting, and selection support services to attract and hire high-performing, diverse staff. Maintain strategic focus on developing various pipelines of diverse talent utilizing special hiring authorities, entry level programs, and tailored candidate assessment methods to enhance the quality of the hiring process, and delivering an overall hiring experience that is fair, transparent, and efficient. Build and maintain strategic partnerships with colleges, universities, professional organizations, and affinity groups that serve diverse populations. Continue ongoing investments in the review, negotiation and implementation of salary reset to meet the CFPB's legal requirements under Dodd-Frank Act to equitably set the CFPB's salaries, and ensure comparability to the Federal Reserve Board and other financial regulatory agencies.

## **Performance Measures**

The CFPB will assess the progress on achieving objective 4.1 through the following performance measures:

### **MEASURE 4.1.1: PERCENT OF EEO COUNSELING AND INVESTIGATIONS PROCESSED WITHIN REGULATORY TIMEFRAMES (NEW APP MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>						95%	95%	95%
<b>Actual</b>						100%	TBD	TBD

### **MEASURE 4.1.2: MANAGEMENT TRAINING SURVEY RATING ON APPLYING LEARNED SKILLS TO JOB RESPONSIBILITIES (AGGREGATE OF THREE QUESTIONS ON SEVEN POINT SCALE)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		5.75	5.75	5.75	5.0	5.75	5.75	5.75
<b>Actual</b>		6.4	6.5	6.34	6.26	5.70	TBD	TBD

**MEASURE 4.1.3: INCLUSION QUOTIENT: ANNUAL EMPLOYEE SURVEY (AES) RATING ON PERCEPTIONS OF INCLUSION AND DIVERSITY**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	67%	70%	70%	67%	67%	70%	71%	71%
<b>Actual</b>	72.5%	67.2%	66.6%	67%	72.7%	71%	TBD	TBD

**MEASURE 4.1.4: OPM EMPLOYEE ENGAGEMENT INDEX**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>				70%	70%	75%	75%	75%
<b>Actual</b>				71.2%	79%	74%	TBD	TBD

**MEASURE 4.1.5: PERCENT OF THE CFPB'S ANNUAL ETHICS TRAINING PROGRAM THAT COMPLIES WITH THE OFFICE OF GOVERNMENT ETHICS REQUIREMENTS FOR TRAINING EMPLOYEES WHO FILE PUBLIC AND CONFIDENTIAL DISCLOSURE REPORTS (NEW APP MEASURE FOR FY 2023, PREVIOUSLY TRACKED INTERNALLY)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>			100%	100%	100%	100%	100%	100%
<b>Actual</b>			100%	100%	100%	100%	TBD	TBD

## Progress update and future action

In December 2022, CFPB reached agreement with the National Treasury Employees Union (NTEU) to reform its compensation system. The new system fosters pay equity, promotes fair pay-setting practices, and establishes more transparent pay scales across the CFPB. As a key component of compensation reform, the CFPB will also undergo a salary reset process to better align employee salaries with experience and, thereby, promote pay equity, fairness, and transparency.

In FY 2022, OMWI, with the support of CFPB stakeholders, conducted several programs and initiatives to advance diversity, equity, inclusion, and accessibility at the CFPB:

- DEIA Strategic Plan: In March 2022, CFPB launched its five-year DEIA Strategic Plan, which includes agency-wide DEIA goals and actions. It is published on the CFPB's public website, consumerfinance.gov. OMWI led a cross-agency team to facilitate the development of the Plan and is coordinating tracking progress of the goals and actions at

the agency and division level. An annual progress report will be posted on the website each June.

- Integration of DEIA into CFPB Processes: OMWI worked with the Office of Strategy to integrate DEIA principles and objectives into the CFPB's Strategic Plan and Divisional Biannual Performance Review (BPR) process to integrate DEIA into CFPB operations and business activities and to ensure accountability.
- In FY 2022, CFPB conducted mandatory DEIA training for all CFPB divisions. The training, which focused on cultivating inclusive teams, was designed to provide substantive opportunities for discussion, practice, and collaboration within the CFPB workforce.
- Professional Development Pilot: In April 2022, CFPB launched a professional development pilot program in its SEFL Division designed to assist employees in administrative positions with skills development and career planning to support advancement beyond their current administrative positions. The goal is to leverage the learnings from the pilot to establish a cross agency program. CFPB is currently evaluating the learnings from the pilot.
- Subsequent to the dissolution of the Office of Equal Opportunity and Fairness (OEOF) in March 2022, OMWI successfully transitioned the Disability and Accessibility Program Section (DAPS) into the OMWI suite of programs. This movement helped to streamline DEIA-related programs. The Office of Civil Rights continues to be maintained separately to ensure the appropriate firewalls between the Reasonable Accommodations Program under DAPS and the EEO Complaints Program.
- Throughout FY 2022, OMWI continued to provide programming, communications and activities—heritage events and education sessions, monthly OMWI Director messages, dialogues, wiki postings, guides, etc.—to enhance employees cultural awareness and intelligence in order to foster a diverse and inclusive workplace.

Similarly, the Office of Civil Rights (OCR) partnered with internal stakeholders such as OMWI and the Office of Human Capital on high-impact civil rights initiatives in FY 2022, including:

- Revising internal policy review processes to ensure OCR can provide technical assistance on all new or revised workplace-related policies to monitor for civil rights and EEO impacts and embed non-discrimination and inclusion principles in all CFPB practices.
- Assisting the Operations Division/OHC in reviewing and updating the CFPB's Leader Performance Standards for executives, manager of managers and first-line supervisors to include more in-depth EEO/DEIA standards, which will go into effect in FY 2024.
- Conducting a one-day agency-wide EEO training for CFPB supervisors and managers covering everything from EEO laws, harassment and retaliation, the EEO process, alternative dispute resolution (ADR), and reasonable and religious accommodations.

- Participating in the White House DEIA initiative webinar titled “Promising Practices from Agencies” highlighting the outstanding work the CFPB has done to promote LGBTQ+ equity and inclusion within the CFPB as reflected in Executive Order 13988.
- Launching the Person’s with Disabilities Action Plan to begin addressing and eliminating barriers to equal employment opportunity identified for persons with a disability or a targeted disability. Updates will be provided in the CFPB’s FY 2022 Affirmative Action Plan.
- Continuing to monitor implementation of action-items identified in CFPB’s barrier analysis regarding experiences of African American and Hispanic/Latino employees.

## Objective 4.2

*Define and implement a modern, forward-leaning workplace model that is responsive to the CFPB’s organizational needs.*

**Primary objective leaders:** Operations Division, Office of Minority & Women Inclusion, and Office of Civil Rights

### Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 4.2.

#### Strategies

- Optimize utilization of the CFPB’s workplace to promote the well-being, safety, security, accessibility, and productivity of all employees.
- Deploy and maintain a complementary suite of cost-effective and secure tools and technology to optimize the way staff can execute their work collaboratively and efficiently.
- Ensure that DEIA goals and priorities are developed and implemented; enforce federal civil rights laws and EEO regulations prohibiting workplace discrimination; coordinate fair lending activities and ensuring fair, equitable, non-discriminatory access to credit for both individuals and communities; maintain a robust Disability and Accessibility Program to ensure accessibility within the CFPB.
- Continue to foster a positive, innovative work environment that promotes diversity, equity, integrity, inclusion, and trust for all employees.

## **Investments**

### **PERSONNEL**

Invest in several areas, including a training platform and an Interagency Agreement (IAA) with National Defense University (NDU) that will help Cybersecurity staff obtain specialized technical training geared to enhancing security responsibilities in emerging areas such as zero trust and oversight of cloud computing solutions. Additionally, all CFPB staff will be educated on cybersecurity best practices as the CFPB's Phishing Awareness and Insider Threat programs continue to be implemented. The CFPB has expanded cybersecurity role-based training to align with industry best practices and the National Institute of Standards and Technology (NIST) National Initiative for Cybersecurity Education (NICE) Framework.

### **CLOUD APPLICATION PLATFORMS**

Continue to invest in cloud-based application systems as strategic platforms to streamline CFPB processes, coordinate stakeholder interactions and workflows, and enhance visibility and reporting. The CFPB has launched applications on these platforms, including tools for handling consumer complaints, coordinating interactions with supervised entities, providing informal guidance to regulated entities, increasing collaboration and information sharing among CFPB staff, and an integrating and automated platform for CFPB IT and operations services.

### **CLOUD INFRASTRUCTURE AND SERVICES**

Continue investing in cybersecurity cloud capabilities incorporating principles of "never trust – always verify". These include capabilities to authenticate and identify users of cloud computing services, monitor sensitive data repositories, analyze application and account behavior patterns, and leverage security services embedded in the cloud computing services used by the CFPB.

### **DESIGN AND SOFTWARE DEVELOPMENT SUPPORT**

Continue to optimize capacity to design, develop, implement, and maintain new digital products and tools with enhanced capabilities, features, and functionalities for a variety of business applications that securely support the CFPB's mission.

### **IT PORTFOLIO MANAGEMENT AND ENTERPRISE ARCHITECTURE**

Using ongoing Enterprise Architecture operations and IT Portfolio Management, Technology and Innovation (T&I) is partnering directly with CFPB business leadership to ensure maximum value is provided by CFPB technology investments and to increase the transparency of T&I's technology strategy and project timelines. A cross-CFPB Technical Executive Steering Committee (TESC) assists T&I in balancing considerations of CFPB priorities, mission needs, and budget, to ensure that IT investments deliver improved CFPB mission outcomes, remove barriers to successfully deploying IT-enabled capabilities, and prioritize desired business outcomes for technology development teams. A strategic technology roadmap depicting

improvement initiatives will be used to guide investments, align T&I resources, and inform near- and longer-term budget and procurement actions.

#### **LEGAL TECHNOLOGY PLATFORM**

Continue efforts to maintain and improve the CFPB's legal technology shared service center to meet the needs and obligations of the CFPB. This includes Congressional requests, enforcement and fair lending investigations and actions, FOIA support, docket management support, internal investigations and litigation, managing regulatory comments, supervision requests for information, and market studies with unstructured documents. This investment also includes the necessary technology and resources needed to collect internal documents as well as store and process large amounts of documents to be reviewed.

#### **LEVERAGE DIVERSITY, EQUITY, INCLUSION, AND ACCESSIBILITY**

Continue to maintain the Disability Accessibility Program Section to assess overall accessibility needs at the CFPB. The DAPS ensures timeliness in resolution of accommodation requests to maintain an accessible workplace. Maintain and invest in an efficient and neutral EEO complaints process and hold the agency accountable for violations of civil rights laws.

#### **TECHNOLOGY STRATEGY AND TRANSFORMATION SUPPORT**

Invest in the digital transformation of our IT systems including migration to cloud-based platforms, enhanced support for data analytics, continuously improving security risk identification and management, and empowered mobility of the CFPB's workforce. The CFPB supports this transformation by investing in enterprise-wide IT portfolio management and governance, extensive marketplace and technology research, organizational change management, communications, workforce coaching, and agile project management to enable transformation goals.

## **Performance Measures**

The CFPB will assess the progress on achieving objective 4.2 through the following performance measures:

#### **MEASURE 4.2.1: PERCENT OF CFPB FACILITIES THAT ARE COMPLIANT OR ACTIVE AGAINST INDUSTRY STANDARDS AND APPLICABLE FEDERAL GUIDANCE (NEW MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>							100%	100%
<b>Actual</b>							TBD	TBD

**MEASURE 4.2.2: PERCENT OF MAJOR FACILITIES AND SECURITY PLANS THAT ARE UP-TO-DATE (NEW MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>							100%	100%
<b>Actual</b>							TBD	TBD

### Progress update and future action

CFPB achieved the Fitwel Viral Response (renewed on April 30, 2022) and Fitwel Building (certified on February 14, 2022) certificates for the 1700 G Street facility. These certificates demonstrate that the suite of health and safety strategies implemented at the 1700 G Street facility create a healthy and resilient environment for all of staff and visitors. The Fitwel Viral Response re-certification takes place annually and the Fitwel Building re-certification takes place every three years.

In FY 2022, the DAPS successfully managed 100% of the reasonable accommodation requests it received. DAPS led the development of the disability and accessibility related goals in the DEIA Strategic Plan, worked with business units to ensure 508 compliance, and launched a campaign to raise awareness and engage management in advancing accessibility at CFPB called “Elevate the A.” OMWI and DAPS secured funding resources for FY 2023 to support technology improvements for accessibility and support services for reasonable accommodation. Progress was made on the disability barrier analysis action plan and updates will be provided in the CFPB’s FY 2022 Affirmative Action Plan.

## Objective 4.3

*Advance the work of the CFPB through innovative and optimized operational support.*

**Primary objective leaders:** Operations Division and Office of Civil Rights

### Strategies and Investments

The following strategies and investments have been put in place to help the CFPB achieve objective 4.3.

#### Strategies

- Provide easy to access data and analytics to the people who need it, when they need it to support data-driven decision-making, rulemaking, and oversight.

- Mature and embed cybersecurity best practices from inception with strategic planning, resource allocation and development of systems, policies, and processes.
- Align resources to the mission and promote budget discipline to ensure resources are properly and effectively allocated.
- Provide accurate, complete, and meaningful information about the financial and operating performance of the CFPB to promote integrity and transparency to internal and external stakeholders.
- Mature the Enterprise Risk Management (ERM) program, Internal Policies Program, Audit Oversight Program, and CFPB's approach to enterprise governance to strengthen leadership decision-making, align risk considerations with strategic planning, prioritization, and resource allocation, foster a risk-aware culture, and improve overall organizational performance.
- Mature the Enterprise Data Management (EDM) program to ensure the CFPB's data and information are appropriately accessible by internal and external stakeholders and deliver value to leadership decision-making.
- Conduct barrier analyses and implement associated action items to eliminate identified barriers to equal employment opportunity through the OCR.

## **Investments**

### **PERSONNEL**

Support staff by implementing a new work model which provides more flexibility in where and when work is completed to achieve the CFPB's mission. Provide training and support to staff to develop new ways in how we work to improve results associated with a hybrid work environment.

### **AUDITS OF THE CFPB**

Continue to work with the Office of Inspector General of the Board of Governors of the Federal Reserve System and the Bureau of Consumer Financial Protection, the Government Accountability Office (GAO), and an independent contractor for external auditing and oversight of the CFPB's operations and budget.

### **CYBERSECURITY**

The CFPB will continue to enhance a robust cybersecurity program that secures and safeguards communications, data, and IT resources through a combination of comprehensive policies, continuous monitoring, and leading technologies. Cybersecurity manages risks, protects our consumer data and ensures that our systems are managed and measured. The CFPB's Cybersecurity Team employs an established (NIST 800-37-based) six-step process (Categorize, Select, Implement, Assess, Authorize and Monitor) to monitor and report risk of compromise across all IT systems. The CFPB's cybersecurity efforts also focus on implementing the requirements of EO 14028 on Improving the Nation's Cybersecurity by enhancing cybersecurity

through a variety of initiatives. These initiatives relate to the security and integrity of the software supply chain, securing cloud services, and implementing zero trust architecture and encryption. The CFPB will also continue to mature cybersecurity operations capabilities to meet new requirements defined in multiple Office of Management and Budget (OMB) memoranda and Cybersecurity and Infrastructure Security Agency (CISA) directives, including behavior analytics, security automation and orchestration, asset discovery and vulnerability management.

## **DATA INFRASTRUCTURE AND ANALYSIS**

The CFPB will continue to work toward migration from the current on-premise data platform to a modern cloud-based environment, which will allow us to more easily scale and unlock additional tools and capabilities to better serve the CFPB. This fiscal year the CFPB has begun to implement an Enterprise Data Strategy, which defines how the CFPB's data resources, platforms, and tools can best be leveraged to meet our mission. Part of the strategy will involve further adoption of foundational data management capabilities to improve and strengthen processes. This investment also provides more scalable and easy-to-use analytical capabilities for data-driven decision making in enforcement actions, examinations, market monitoring and complaint data analytics.

## **ENTERPRISE RISK MANAGEMENT, INTERNAL POLICIES, AUDIT OVERSIGHT, AND ENTERPRISE GOVERNANCE SUPPORT**

Continue to improve the CFPB's ERM capabilities by facilitating more robust risk response strategies, developing risk tolerances aligned to the CFPB Risk Appetite Statement, building risk management capacity across the CFPB, and maintaining a Level 3 ERM maturity level. Additionally, invest in the CFPB's ability to effectively manage the process for developing, updating, and maintaining the CFPB's internal policies and supporting documents. Invest in improving the effectiveness of the CFPB's internal governance bodies.

## **FINANCIAL MANAGEMENT SUPPORT SERVICES, INCLUDING TRAVEL**

Continue to invest in a shared services model for financial management services in the areas of budget execution, purchasing, accounts payable, accounts receivable, general ledger, travel, and fixed assets. These services and systems provide an infrastructure to achieve a strong internal control environment that conforms with regulations and best practices and realizes efficiencies by leveraging the expertise of shared service providers.

## **INTERNAL CONTROL ASSESSMENT PROGRAM SUPPORT**

Continue to invest in resources that maintain accountability for effective internal controls and follow appropriate models to assess and enhance the CFPB's internal control, such as the Federal Managers' Financial Integrity Act of 1982 (FMFIA), GAO's Green Book, and best practices derived from OMB Circular A-123.

## **KNOWLEDGE MANAGEMENT**

Invest in the CFPB's ability to leverage knowledge about data to address questions quickly, know what information to look for and where to find it and identify learning opportunities for staff.

## **PROCUREMENT SERVICES AND SUPPORT**

Provide clear and transparent data tracking for all awards including small business and MWOB awards as part of the CFPB's contracting process. All awards data and ongoing trends will be fully accessible by CFPB management and personnel.

## **Performance Measures**

The CFPB will assess the progress on achieving objective 4.3 through the following performance measures:

### **MEASURE 4.3.1: PERCENTAGE OF CONTRACTS COMPETITIVELY AWARDED OVERALL**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>	90%	90%	90%	80%	80%	80%	80%	80%
<b>Actual</b>	87%	87.2%	82%	82.6%	83.5%	92.3%	TBD	TBD

### **MEASURE 4.3.2: ACHIEVE OFFICE OF INSPECTOR GENERAL (OIG) MATURITY MODEL RATINGS OF LEVEL 4 (MANAGED & MEASURABLE) ACROSS MULTIPLE CYBERSECURITY FRAMEWORK AREAS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>			2 of 5 Areas	3 of 5 Areas	5 of 5 Areas	5 of 5 Areas	4 of 5 Areas	4 of 5 Areas
<b>Actual</b>			3 of 5 Areas	3 of 5 Areas	5 of 5 Areas	3 of 5 Areas	TBD	TBD

### **MEASURE 4.3.3: PERCENTAGE OF AUDIT FINDINGS CLOSED BY THE AUDITOR WITHIN TWO FISCAL YEARS**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>		Baseline	75%	80%	80%	80%	80%	80%
<b>Actual</b>		65%	93%	78%	63%	75%	TBD	TBD

**MEASURE 4.3.4: PERCENT OF DATA SETS (STORAGE) THAT RESIDE IN THE CLOUD ENVIRONMENT (NEW MEASURE FOR FY 2023)**

	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Target</b>							Baseline	TBD
<b>Actual</b>							TBD	TBD

### Progress update and future action

OCR will continue to monitor the implementation of action items associated with ongoing barrier analysis efforts to eliminate identified barriers to equal employment opportunity.

Progress will be reported annually in the CFPB's Management Directive (MD) 715 report and Affirmative Action Plan.

In FY 2022, CFPB updated its agency-wide risk profile and risk appetite statement. CFPB also established a governance body to oversee enterprise risk mitigation, developed an approach to establishing risk tolerance, and is scheduled to conduct an independent evaluation of the CFPB's ERM maturity. These advancements in ERM resulted in the CFPB maintaining its overall level of ERM maturity at Level 3.

In FY 2022, CFPB centralized the management of its internal policies under the Chief Risk Officer within the Operations Division's front office. Over the past year, CFPB has successfully updated its policy and processes for the management of internal policies, developed a policy library prototype to facilitate employees' access to internal policies, and rolled out a campaign to align existing policies to the new guidance.

Accountability for remediating audit findings is a priority for CFPB management. The CFPB has an established process to track, monitor, proactively report status, and address findings reported by its auditing entities (GAO, OIG, and the independent auditor of budget and operations). In FY 2022, the CFPB fully addressed 18 of the 24, or 75%, of the findings assigned to the CFPB. The 18 closed findings reported represent items in which corrective actions have been implemented by the CFPB and the auditor has confirmed the findings have been resolved. In FY 2023, the CFPB will continue to track and remediate open findings on an ongoing basis.

## Appendix A: Historical Measures

In FY 2022, the CFPB identified performance measures to track implementation of the newly published *CFPB FY 2022 – 2026 Strategic Plan*, focusing on measures with more outcome-based results. The CFPB's FY 2023 performance measures include some pre-existing measures and some that are newly created. The historical measures below were tracked through FY 2022 and will not be maintained in FY 2023. For more information on historical measures prior to FY 2022, please consult [past APPs](#).

### Retired after FY 2022

#### SATISFACTION RATE FOR USERS OF CFPB'S ONLINE EDUCATIONAL RESOURCES

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						Baseline	80%	80%
Actual						80%	83%	82%

#### NUMBER OF TEACHERS REACHED WITH ACTIVITIES FOR CLASSROOM USE

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				2,000	5,000	20,000	60,000	80,000
Actual				2,200	13,076	50,768	79,065	110,852

#### NUMBER OF STRATEGIC ENGAGEMENTS WITH KEY HIGH-LEVEL STAKEHOLDERS TO IDENTIFY AND UNDERSTAND CHALLENGES FACING SPECIAL POPULATIONS IN THE FINANCIAL MARKETPLACE

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target								120
Actual								194

#### NUMBER OF REPORTS, ISSUE BRIEFS, OR ADVISORIES ISSUED TO OUTLINE CURRENT OR EMERGING FINANCIAL CHALLENGES FACING SPECIAL POPULATIONS

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target								20
Actual								44

**NUMBER OF INITIATIVES COMPLETED THAT ESTABLISH FINDINGS OR EVIDENCE RELATED TO DISCLOSURE METHODS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target			Baseline	1	4	3	2	
Actual				0	1	2	1	0

**NUMBER OF PROPOSED AND FINAL RULES INTENDED TO IMPROVE CONSUMERS' UNDERSTANDING OF CONSUMER FINANCIAL PRODUCTS AND SERVICES**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target			Baseline	1	2	2	1	
Actual				2	1	1	4	0

**NUMBER OF ASSESSMENTS AND REGULATORY REVIEWS COMPLETED WITHIN STATUTORY DEADLINE**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					3	1	1	0
Actual					3	1	2	0

**PERCENTAGE OF PROPOSED RULEMAKINGS FINALIZED OR OTHERWISE RESOLVED WITHIN NINE MONTHS OF THE DUE DATE FOR RECEIPT OF FINAL PUBLIC COMMENTS.<sup>15</sup>**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target	75%	75%	75%	75%	75%	75%	75%	75%
Actual	86%	100%	88%	60%	100%	75%	100%	100%

<sup>15</sup> This measure does not include interagency rulemakings, rulemakings inherited from the Board, and rulemakings on which the CFPB expects to do further quantitative research following the receipt of public comments.

**PERCENTAGE OF INDUSTRY SMALL BUSINESS REGULATORY ENFORCEMENT FAIRNESS ACT (SBREFA) PARTICIPANTS REPORTING POSITIVE FEEDBACK OF THE SBREFA PROCESS ON USER SURVEYS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					Baseline	Baseline	Baseline	80%
Actual					N/A	N/A	92%	90%

**PERCENTAGE OF SMALL ENTITY COMPLIANCE GUIDES RELEASED OR UPDATED WITHIN 90 DAYS OF PUBLICATION OF THE RULE IN THE FEDERAL REGISTER**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				75%	75%	75%	75%	75%
Actual				83%	100%	100%	100%	N/A

**NUMBER OF IMPLEMENTATION GUIDANCE AND COMPLIANCE AIDS PUBLISHED**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				8	15	20	25	25
Actual				25	24	38	33	5

**NUMBER OF INTERNET PAGEVIEWS / DOWNLOADS OF REGULATORY IMPLEMENTATION MATERIALS AND OTHER ONLINE SUPPORT MATERIALS FROM THE BUREAU'S WEBSITE**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				Baseline	950,000/ 220,000	950,000/ 220,000	950,000/ 220,000	950,000/ 220,000
Actual				918,754/ 214,754	821,107/ 188,628	998,431/ 270,163	781,199/ 210,767	1.08M/ 217,841

**NUMBER OF WRITTEN RESPONSES TO INFORMAL GUIDANCE INQUIRIES PUBLISHED VIA IMPLEMENTATION AIDS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					Baseline	10	10	10
Actual					10	12	11	24

**PERCENTAGE OF INDUSTRY PARTICIPANTS REPORTING POSITIVE FEEDBACK OF IMPLEMENTATION AND GUIDANCE MATERIALS ON USER SURVEYS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					Baseline	70%	75%	75%
Actual					66%	75%	60.5%	61%

**THE PERCENTAGE OF HMDA REGULATORY GUIDANCE INQUIRIES ANSWERED WITHIN PRESCRIBED TIMEFRAME**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					Baseline	85%	85%	
Actual					84%	91%	92.5%	

**MONTHLY AVERAGE NUMBER OF INNOVATION-FOCUSED ENGAGEMENTS WITH EXTERNAL STAKEHOLDERS AND REGULATORY PEERS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					Baseline	30	30	
Actual					32	31	22	

**MONTHLY AVERAGE NUMBER OF CONSUMER FINANCIAL MARKET INTELLIGENCE GATHERING MEETINGS WITH EXTERNAL STAKEHOLDERS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				80	50	50	60	60
Actual				153	48.8	87	76	35.5

**PERCENTAGE OF CONSUMER FINANCIAL MARKETS WITH INTELLIGENCE GATHERING MEETINGS WITH EXTERNAL STAKEHOLDERS EACH QUARTER**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				80%	80%	80%	80%	80%
Actual				86%	92%	100%	100%	100%

**NUMBER OF CONSUMER FINANCIAL MARKETS MONITORED THROUGH STANDARDIZED DATA**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				10	10	10	10	10
Actual				10	10	10	13	11

**PERCENTAGE OF THE FIVE LARGEST CONSUMER FINANCIAL MARKETS MONITORED THROUGH STANDARDIZED DATA**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				80%	80%	80%	80%	80%
Actual				80%	80%	80%	80%	80%

**NUMBER OF INTERNET PAGEVIEWS / DOWNLOADS OF BUREAU DATA RELEASES AND PUBLICATIONS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				Baseline 20,000	70,000/ 20,000	75,000/ 25,000	75,000/ 25,000	150,000/ 15,000
Actual				67,563/ 18,457	68,474/ 23,678	70,884/ 27,139	223,762/ 9,152	79,267/ 5,301

**NUMBER OF INTERNET PAGEVIEWS / DOWNLOADS OF PUBLISHED REPORTS AND RESEARCH PUBLICATIONS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				Baseline 20,000	50,000/ 20,000	50,000/ 20,000	50,000/ 20,000	60,000/ 25,000
Actual				47,498/ 18,089	37,216/ 13,207	45,000/ 15,000	60,949/ 22,764	63,852/ 33,303

**PERCENTAGE OF THE RESEARCH UNIT'S STATUTORILY REQUIRED TOPIC AREAS WITH EVIDENCE OR FINDINGS ESTABLISHED IN PUBLISHED REPORTS AND RESEARCH PUBLICATIONS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				Baseline	83.3%	83.3%	83.3%	83.3%
Actual				83.3%	N/A	83.3%	83.3%	83.3%

**PERCENT COVERAGE OF U.S. STATES, COMMONWEALTHS, AND TERRITORIES COVERED BY THE BUREAU'S STAKEHOLDER ENGAGEMENT**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					Baseline	100%	100%	
Actual					100%	100%	100%	

**NUMBER OF STAKEHOLDER ENGAGEMENTS THAT INCLUDE BUREAU LEADERSHIP AND SUBJECT MATTER EXPERTS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					500	1,100	1,100	1,100
Actual					1,056	2,398	1,379	1,353

**PERCENTAGE OF STATUTORILY REQUIRED MEETINGS WITH THE BUREAU'S ADVISORY COMMITTEES HELD**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					100%	100%	100%	100%
Actual					100%	100%	100%	100%

**NUMBER OF PUBLIC REPORTS ON ACTIONS BY THE BUREAU'S ADVISORY COMMITTEES (E.G., IN-PERSON MEETING SUMMARIES, ANNUAL COMPREHENSIVE REVIEW, ETC.)**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					Baseline	4	4	4
Actual					5	6	9	8

**AVERAGE NUMBER OF BUSINESS DAYS TO ISSUE A SUPERVISORY LETTER OR EXAMINATION REPORT FOLLOWING THE FINALIZATION OF EXAM ANALYSIS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				60	60	60	60	60
Actual				67	59	45	39	40

**PERCENTAGE OF SUPERVISORY MATTERS REQUIRING ATTENTION REPORTED COMPLETE BY THE ENTITY IN THE PRESCRIBED TIMEFRAME IN RESPONSE TO SUPERVISORY EVENTS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				N/A	90%	90%	90%	90%
Actual				92%	93%	94%	93%	93%

**PERCENTAGE OF PUBLIC ENFORCEMENT ACTIONS IN WHICH COORDINATED OR JOINT ACTION IS TAKEN WITH OTHER FEDERAL OR STATE REGULATORS/LAW ENFORCEMENT AGENCIES**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						No Target	No Target	
Actual						15%	21%	

**AVERAGE DURATION, IN MONTHS, TO CLOSE INVESTIGATIONS WITHOUT PUBLIC ACTION**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						Baseline	15	
Actual						23	22	

**NUMBER OF WRITTEN COMMUNICATIONS ABOUT COMPLIANCE EXPECTATIONS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target		N/A		3	3	3	3	3
Actual		4		1	2	3	2	3

**PERCENTAGE OF USERS SUSCEPTIBLE TO PHISHING ATTACKS**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					<7% of users tested	<10% of users tested	<10% of users tested	<10% of users tested
Actual					16.15% of users tested	15.5% of users tested	32.5% of users tested	9.8% of users tested

#### AVERAGE TIME TO REPORT CYBERSECURITY INCIDENTS TO US-CERT

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						30 mins	2.5 mins	2.5 mins
Actual					3.36 mins	1.8 mins	1.02 mins	

#### NUMBER OF CRITICAL OR HIGH OVERDUE PLAN OF ACTIONS & MILESTONES (POA&MS)

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						<10%	<10%	
Actual						70%	82%	

#### PERCENT OF ENDPOINTS RUNNING OPERATING SYSTEMS THAT ARE OVER 12 MONTHS OUT-OF-DATE FROM THE LATEST PUBLISHED RELEASE DATE.

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						<10%	<10%	
Actual						55.9%	1.7%	

#### AES RATING ON PERCEPTIONS OF TECHNICAL COMPETENCE OF THE BUREAU STAFF (% FAVORABLE)

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target	63%	64%	68.5%	70%	70%	66%	66%	69%
Actual	67.4%	67.9%	72.1%	57.1%	57.0%	67.4%	70.4%	69.9%

#### FEDERAL INFORMATION TECHNOLOGY ACQUISITION REFORM (FITARA) SCORE

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target				Baseline	B	A	A	B-
Actual				C-	C-	B-	B-	C-

#### PERCENTAGE OF BUREAU SOFTWARE LICENSES TRACKED BY ASSET MANAGEMENT SYSTEM

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target					40%	70%	80%	90%

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	
Actual						40%	88.6%	91%	96.15%

**PERCENTAGE OF IT INVESTMENTS THAT ARE ADEQUATELY IMPLEMENTING HUMAN CENTERED DESIGN AND ORGANIZATIONAL CHANGE MANAGEMENT**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						50%	75%	80%
Actual						67%	75%	82%

**PERCENTAGE OF DOLLARS AWARDED TO MINORITY OWNED BUSINESSES<sup>16</sup>**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						5%	10%	
Actual						19.2%	24.6%	

**PERCENTAGE OF DOLLARS AWARDED TO WOMEN OWNED BUSINESSES**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Target						5%	10%	
Actual						16.6%	16.9%	

<sup>16</sup> Supplier diversity measures will continue to be tracked internally at the BPR and externally in the OMWI Annual Report to Congress which will be released in early April.

#### LEVEL OF ENTERPRISE RISK MANAGEMENT (ERM) MATURITY

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
<b>Target</b>				Level 2 ERM Maturity	Level 2 ERM Maturity	Level 3 ERM Maturity	Level 3 ERM Maturity	Level 3 ERM Maturity
<b>Actual</b>				Level 2 ERM Maturity*	Level 2 ERM Maturity*	Level 3 ERM Maturity*	Level 3 ERM Maturity*	Level 3 ERM Maturity*

\* Internal assessment of ERM maturity.

#### PERCENTAGE OF USERS WHO COMPLETE ANNUAL PRIVACY TRAINING

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
<b>Target</b>							>90%	>90%
<b>Actual</b>							99.8%	99.8%

#### PERCENTAGE OF PRIVACY BREACHES CATEGORIZED AS HAVING LOW RISK TO HARM

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
<b>Target</b>							>95%	>95%
<b>Actual</b>							100%	99%

#### PERCENTAGE OF USERS WHO AGREE OPERATIONS SERVICES ADDRESSED THEIR NEED

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
<b>Target</b>							65%	68%
<b>Actual</b>							82%	91%

#### PERCENTAGE OF USERS WHO AGREE THAT THE PROCESSES SUPPORTING OPERATIONS SERVICES ARE EASY TO COMPLETE

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
<b>Target</b>					Baseline	50%	65%	68%
<b>Actual</b>					44.15%	N/A	72%	85%

**PERCENTAGE OF USER WHO AGREE THAT OPERATIONS STAFF WERE HELPFUL**

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
<b>Target</b>						65%	68%	
<b>Actual</b>						79%	88%	

## Appendix B: Data Validation

Following the CFPB's data accuracy and reliability processes and procedures, the CFPB takes continuous steps to ensure performance information is complete, accurate, and reliable. The following captures key efforts by Strategic Goal and specifically focuses on data sources, summarizes levels of accuracy and data verification approaches, and identifies data limitations along with compensatory counteractions.

### Strategic Goal 1

*Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers' needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination.*

#### Objective 1.1

*Issue rules and guidance implementing Federal consumer financial law.*

- **Data sources:**
  - To measure performance for the measures under Objective 1.1, the CFPB relies on several data sources, including the Federal Register, [www.regulations.gov](http://www.regulations.gov), the CFPB's website, [www.reginfo.gov](http://www.reginfo.gov), federal statutes, and court orders.
- **Level of accuracy and data verification:**
  - The Federal Register provides an accurate record of all CFPB notice and comment rulemakings. The CFPB's website also provides an extensive record of publications, including rulemakings, issued by the CFPB. The Office of Management and Budget publishes each edition of the Unified Agenda on reginfo.gov.
- **Advantages, limitations, and mitigating actions:**
  - An advantage of measure 1.1.1 is that OMB provides guidance to agencies on listing rulemakings on the Unified Agenda.
  - With respect to performance mitigation for the measure 1.1.2, no significant data limitations are known.

#### Objective 1.2

*Supervise institutions to ensure compliance with Federal consumer financial laws.*

- **Data sources:**
  - The CFPB captures and stores data about its supervision matters in SES, its Supervision Examination System. Metrics and measures for the performance goals in support of this objective are updated based on data housed in these systems on a biannual basis, followed by focused management reviews to assess progress toward achieving the CFPB's Strategic Goals and Objectives.
- **Level of accuracy and data verification:**
  - SES provides a streamlined workflow and data validation controls that have been developed to ensure consistent data quality. SES also allows tracking and reporting.
  - The CFPB provides training to users on proper use of SES to ensure data verification and validation.
- **Advantages, limitations, and mitigating actions:**
  - Although the data is frequently reviewed for accuracy, Supervision continues to assess and improve its ability to track its supervision activities to best ensure it is accurately and consistently capturing supervision data.

### Objective 1.3

*Enforce Federal consumer financial laws to hold violators accountable and deter misconduct and repeat offenses.*

- **Data sources:**
  - The CFPB captures and stores data about its enforcement matters in ENForce, its matter management system. Metrics and measures for the performance goals in support of this objective are updated based on data housed in these systems on a biannual basis, followed by focused management reviews to assess progress toward achieving the CFPB's Strategic Goals and Objectives.
- **Level of accuracy and data verification:**
  - ENForce provides a streamlined workflow and data validation controls that have been developed to ensure consistent data quality. ENForce also allows tracking and reporting.
  - The CFPB provides training to users on the proper use of ENForce to ensure data verification and validation.

- **Advantages, limitations, and mitigating actions:**

- Although the data is frequently reviewed for accuracy, Enforcement continues to assess and improve its ability to track its enforcement activities to best ensure it is accurately and consistently capturing enforcement data.

## Strategic Goal 2

*Empower consumers to live better financial lives, focusing on traditionally underserved people.*

### Objective 2.1

*Engage with consumers, directly and through trusted partners, to provide information, guidance, and technical assistance regarding consumer financial products and services.*

- **Data sources:**

- The number of consumers served through Ask CFPB and other digital financial education tools, print publications, and downloads of tools, papers, and materials are based on Google Analytics data for unique users to consumerfinance.gov and print orders from the Government Publishing Office. Community partner data, such as number of staff trained and number of individuals served, is measured through CFPB databases as well as through reports from regional and local partners.
- Web analytics for the CFPB website are the data source for reports dated between October 1, 2021, and September 30, 2022.
- The CFPB maintains stakeholder engagement tracking databases.

- **Level of accuracy and data verification:**

- The data sources listed above were reviewed to determine metrics related to all relevant final rules, proposed rulemakings, published reports, outreach and other initiatives covered by the performance metrics. The website analytics are provided by Google Analytics 360, which provides numbers based on website user sessions.
- The stakeholder engagement information presented is dependent on accurate and consistent usage of the CFPB's stakeholder management tracking database.

- **Advantages, limitations, and mitigating actions:**

- If the CFPB's stakeholder management tracking database is not used on a consistent or accurate basis, then the information stored in the system would be limited.

## Objective 2.2

*Collect consumers' inquiries and complaints, and work to ensure companies offering consumer financial products and services provide responses to consumers' complaints.*

- **Data sources:**

- The CFPB maintains a consumer response complaint management system.

- **Level of accuracy and data verification:**

- The Office of Consumer Response conducts regular data reviews and cross-checks accuracy for all key performance measures, including number of days to route to the company and percentage of company responses that are timely. The Office also tracks the proportion of complaints received via the web channel and the number of consumer complaints handled by the CFPB.

- **Advantages, limitations, and mitigating actions:**

- No data limitations are known.

## Objective 2.3

*Expand the CFPB's reach and build relationships with external stakeholders and government partners to amplify relevant tools, messages, and resources.*

- **Data sources:**

- Measured using CFPB's Engagement Management System (eCRM).
  - The Office of Procurement tracks competition and reporting data measurements on an annual basis and has developed a live dashboard of procurement metrics, including competition, small business and diversity that is available to all CFPB employees.

- **Level of accuracy and data verification:**

- The information presented is dependent on accurate and consistent usage of the CFPB's stakeholder management tracking database.

- The Office of Procurement dashboard is regularly reviewed by staff for accuracy and the underlying data is the subject of multiple audits each quarter.
- **Advantages, limitations, and mitigating actions:**
  - If the CFPB's stakeholder management tracking database is not used on a consistent or accurate basis, then the information stored in the system would be limited.
  - The Office of Procurement dashboard tracks and reports competition, small business and diversity metrics using real-time data which is available to all CFPB employees via the Procurement Wiki page. Calculations are automated and fixed to avoid the need for repeated entry. Limitations involve data integrity as some fields in database require manual entry. This is monitored via the audits described in previous bullet.

## Strategic Goal 3

*Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services.*

### Objective 3.1

*Monitor consumer financial markets to surface relevant trends and identify areas of risk to consumers.*

- **Data sources:**
  - The CFPB website is the data source for the number of reports, issue briefs, advisories, or other actions. The influence over policy or consumer financial market practices is documented by CFPB staff from both internal and external sources. To count the average number of monthly engagements focused on innovation, competition, or emerging consumer market trends, CFPB staff record their engagements with external parties in an online tracking tool.
- **Level of accuracy and data verification:**
  - The CFPB website includes a full accounting of CFPB reports, issue briefs, advisories, or other actions. CFPB staff maintain a process of logging external engagement in the engagement tracking tool and information presented is dependent on accurate and consistent use of the tool.
- **Advantages, limitations, and mitigating actions:**

- With respect to the accounting of CFPB reports, issue briefs, advisories, or other actions, there are no limitations – all products are released externally via the CFPB website. The determination of influence over policy or consumer financial market practices requires a determination by CFPB staff. To mitigate any issues regarding the accuracy of the data, the CFPB will maintain documentation, both internal and external, used to make the determination. Regarding external engagements, there are limitations in the data in that staff must record engagements. The advantage to using such data is that this limitation could result in an undercount of engagements but would not result in overcounting.

## Objective 3.2

*Conduct and publish research focused on: (a) experiences of underserved communities and their access to credit, (b) consumer awareness, understanding, and behavior with respect to consumer financial products and services and with respect to disclosures and related communications, and (c) market developments impacting consumers, including competition and innovation.*

- **Data sources:**

- The CFPB's website is the data source for reports along with the CFPB website of the Social Science Research Network (SSRN), a repository of scholarly research publications.<sup>17</sup> The number of citations of CFPB reports and publications in external publications uses data compiled from Google Scholar, a tool to search scholarly literature across research disciplines, SSRN, and Lexis-Nexis. Public engagement is tracked by CFPB staff.

- **Level of accuracy and data verification:**

- The data sources listed above were reviewed to determine metrics related to all research publications. Google Scholar, SSRN, and Lexis-Nexis provide data on report citations, but does not include a full accounting of CFPB research material cited across varied publications.

- **Advantages, limitations, and mitigating actions:**

- With respect to research products, there are no limitation – all products are released externally via the CFPB website. The sources for the number of citations

---

<sup>17</sup> The CFPB maintains a site designated as a repository for independent research publications at <https://www.ssrn.com/index.cfm/en/cfpb.gov/>.

– Google Scholar, SSRN, and Lexis-Nexis – there are potential limitations regarding whether those external systems capture the full range of existing citations. An advantage is that this limitation could result in an undercount of citations but would not result in overcounting.

## Strategic Goal 4

*Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services.*

### Objective 4.1

*Cultivate an engaged and informed workforce to maximize talent and development in alignment with the CFPB's mission.*

- **Data sources:**

- AES results are captured through an online survey administered under an IAA for reimbursable government services offered by the OPM's Human Resources Solutions group. The IAA provides warranties that services provided for the AES meet professional and legal standards. OPM's USA Survey branded online survey administration tool is used to gather data. This tool is subject to the variety of information security guidelines for government information technology projects and systems. To ensure that all intended employees are invited to complete the annual employee survey, email addresses for the employee population are provided to OPM as the basis for survey invitation.
- Manager Training Applied Learning Metric results are captured through training classroom evaluations, administered during classroom training sessions. Data is then aggregated across multiple deliveries, and calculated for both the period, and cumulative for the fiscal year.

- **Level of accuracy and data verification:**

- To verify data summaries for item and index level results, OPM provides independent verification and reporting of CFPB-wide AES results prior to releasing data to the CFPB. The CFPB's OHC, in partnership with the Office of Research (OR) and a vendor under contract for this effort, then conducts analysis and generate summary reports. All discrepancies between posted and calculated results are subject to 100% verification.
- At a broader level of verification, comparison data from OPM for government-wide results is monitored and verified through data cross checking. In the final

steps of survey processing, the CFPB posts results to external website and sends an internet link and posted results to OPM to meet regulatory guidance.

- **Advantages, limitations, and mitigating actions:**

- The CFPB continues to monitor and evaluate the reliability and validity of these metrics as additional baseline data become available. Adjustment to outcomes, components, or targets may be necessary as measures are better understood.

## Objective 4.2

*Define and implement a modern, forward-leaning workplace model that is responsive to the CFPB's organizational needs.*

- **Data sources:**

- The CFPB monitors the renewal dates of facilities and security certificates and plans to ensure they are up-to-date.

- **Level of accuracy and data verification:**

- The level of accuracy is high and data sources are verified once the certificate or plan is approved.

- **Advantages, limitations, and mitigating actions:**

- No data limitations are known.

## Objective 4.3

*Advance the work of the CFPB through innovative and optimized operational support.*

- **Data sources:**

- The Office of Procurement tracks competition and reporting data measurements on an annual basis and has developed a live dashboard of procurement metrics, including competition, small business and diversity that is available to all CFPB employees.
- OIG Maturity Model ratings are taken from the Annual Audit Report issued by the OIG.
- The migration of data to cloud-based data centers is calculated through the CFPB's network management tools, which can be used to run reports and consolidate information.

- Cloud consumption data are based on internally generated reports and vendor supplied invoices and usage data.
- **Level of accuracy and data verification:**
  - The Office of Procurement dashboard is regularly reviewed by staff for accuracy and the underlying data is the subject of multiple audits each quarter.
  - The CFPB can accurately calculate its footprint across on-premise data centers and can easily replicate those calculations.
  - Cloud utilization metrics may be subject to variations due to shifting business demand for resources that may be driven by internal factors (e.g., discount optimization, prepayments) and external factors (e.g., including changes in overall financial market conditions, or new regulatory requirements). Statistical trend techniques such as moving averages may be used where appropriate to captures the average change in a data series over time.
- **Advantages, limitations, and mitigating actions:**
  - The Office of Procurement dashboard tracks and reports competition, small business and diversity metrics using real-time data which is available to all CFPB employees via the Procurement Wiki page. Calculations are automated and fixed to avoid the need for repeated entry. Limitations involve data integrity as some fields in database require manual entry. This is monitored via the audits described in previous bullet.

# Appendix C: Management Challenges

As identified by the CFPB's OIG, the CFPB faces management challenges in the areas of information security, human capital programs, supervision and enforcement strategy, and consumer complaints. As part of its ongoing, continuous improvement efforts, the CFPB is addressing these challenges.

## 1. Ensuring an effective information security program

The CFPB collects and stores sensitive information, including confidential supervisory information and personally identifiable information, to support many of its mission-critical activities. Unauthorized access to or disclosure of this information, through internal or external threats, could undermine the CFPB and limit its ability to accomplish its mission.

### Agency Action

The CFPB continues to strengthen the information security program in many areas. In FY 2022, the CFPB maintained an OIG Maturity Model of Level 4 (Managed & Measurable) across 3 of 5 Cybersecurity framework areas despite increasing threats and more stringent standards. The CFPB's Data Protection and Privacy programs also stayed at Level-4 maturity to ensure managed and measurable controls and safeguards throughout CFPB operations to include executing a tailored privacy awareness training campaign. The CFPB made progress deploying multi-factor authentication (MFA) and data encryption, reduced the number of end points running outdated operating systems, and continued to test and educate staff about the risks of phishing attacks.

In FY 2022, the CFPB plans to achieve an OIG Maturity Model of Level 4 (Managed & Measurable) across 4 of 5 Cybersecurity framework areas even as standards continue to be increased and elevated. The CFPB plans to improve its cybersecurity maturity level by increasing the number of systems with MFA and data encryption and progress towards the implementation of a zero-trust architecture. The Cybersecurity Team also plans to mature the logging of cybersecurity event collection, enhance incident reporting processes, modernize the security incident and event management system, implement a continuous red-teaming program in line with U.S. Department of Homeland Security (DHS) Binding Operational Directive 20-01, and develop a digital-rights-management solution to decrease the risk of insider threat.

Responsible Executive: Chief Operating Officer, Operations

Related Objective: 4.3

Related Performance Measure: 4.3.2

## 2. Maturing the Human Capital Program

The CFPB continues to build its human capital program to sustain a diverse, high-performing, and engaged workforce. In 2022, OHC addressed specific objectives to continue to mature the human capital program and continues to plan for and adapt to recent changes at the agency. These include changes in strategic priorities, organizational structures, turnover in specialized positions, and new work life policies establishing CFPB as a hybrid workplace. In addition, the OHC welcomed a new Chief Human Capital Officer (CHCO) in October 2022. The new CHCO is actively engaged in assessing the current state of OHC and developing a five-year strategic plan that will support a human capital program dedicated to developing a diverse, high-performing, and engaged workforce.

### Agency Action

OHC successfully negotiated and implemented an agreement with the NTEU on the terms and conditions of the CFPB's new hybrid work environment. The agreement addresses policies and procedures for remote work, telework, employee-initiated requests for a change in duty station, work schedules, workspace, and parking. OHC played an integral role in this effort and will continue to support the ongoing operation and management of the policies and procedures moving forward. The results of the 2022 Annual Employee Survey included several written comments expressing employee satisfaction with the flexibilities offered.

In December 2022 the NTEU and CFPB reached agreement on Salary Reset/Compensation Reform. The goal of this effort includes fostering internal pay equity and promoting fair, effective, and transparent pay setting practices. The CFPB expects to implement new salary ranges, pay setting policies, and reset salaries in 2023. The current compensation agreement expires on December 31, 2023, and the parties will begin to negotiate a new compensation agreement in the summer of 2023.

OHC engaged in a review and revision of the competency-based performance standards for CFPB leaders to reinforce human capital policies and help the agency effectively manage a talented, engaged, diverse, and inclusive workforce. OHC led a cross-functional working group, including Performance Management, Learning and Organizational Development teams, Labor and Employee Relations, OMWI, OCR, and Legal Division from April through November of 2022 to develop proposed revisions to leadership standards. In 2023, OHC will socialize these changes with key stakeholders and implement changes through a comprehensive change management process.

OHC's performance management team conducted a triennial evaluation of the performance management program and a qualitative review of year-end performance narratives written by leaders. Findings have reinforced the understanding of employee appreciation for a coaching

management style, frequent interactions with their supervisors, meaningful awards and recognition, and effective work planning to set performance expectations. Communications regarding performance management in FY 2022 focused on encouraging managers in these activities, providing job aids and resources, including video-based discussions on best practices.

To advance the CFPB's understanding of workforce trends, issues, risks, and opportunities OHC's workforce planning team conducted a range of activities to understand the skills CFPB leaders and team members need to perform their best work in the future. Based on the findings of these activities, OHC is designing new programs to close skill gaps and increase developmental opportunities.

To mature learning and development opportunities, OHC teams provided new and enhanced services that support succession planning, leadership and team member development and operational effectiveness. These included initial planning for a new learning and development program for non-supervisory team members with an interest in developing skills necessary to become competitive for new supervisory job opportunities. OHC a coaching skills course for CFPB Leaders to strengthen core coaching skills among all managers, built common vocabulary around coaching principles, supported a CFPB-wide project management community of practice and developed a change management process to support targeted realignments of the CFPB's organizational structure to effectively respond to expanding mission priorities. Expansion and increased capacity of the CFPB's leadership coaching program allowed senior leaders to further engage in executive leadership coaching, as well as the creation of a new leadership coaching program for first line supervisors.

Responsible Executive: Chief Operating Officer, Operations

Related Objective: 4.1

Related Performance Measures: 4.1.2, 4.1.3, and 4.1.4

### **3. Remaining Adaptable to External Developments While Continuing to Refine the Supervision and Enforcement Strategy**

The CFPB is responsible for ensuring compliance with Federal consumer financial laws by supervising market participants and bringing enforcement actions when appropriate. The Consumer Financial Protection Act of 2010 (CFPA) provides the CFPB with the authority to supervise insured depository institutions and credit unions with more than \$10 billion in total assets and their affiliates and certain nondepository institutions, such as mortgage companies,

payday lenders, private education lenders, and larger participants in other markets as defined by rules issued by the CFPB.

Supervision and Enforcement continue to monitor the impact that the COVID-19 pandemic has had on consumers and communities as well as the depository and nondepository institutions that serve them. The OIG has noted that in light of the uncertainty surrounding the duration and effect of the pandemic, the CFPB faces challenges in adapting its oversight strategy in this evolving environment. As such, the CFPB has been monitoring the ongoing developments associated with the pandemic and its broader effects on the economy and consumer financial marketplace. The CFPB is also reviewing complaints from consumers.

An important objective of the CFPB is to ensure that Federal consumer financial law is enforced consistently, without regard to whether a financial service provider is a depository institution or a nondepository institution. The OIG noted a challenge the CFPB faces in providing sufficient oversight of nondepository institutions given their number in the marketplace. The CFPB is monitoring consumer financial markets to identify potential consumer risks. The CFPB also continues to assess, define, and evolve its strategy for overseeing nondepository institutions, including the types and frequency of supervisory activities at such entities.

The CFPB may apply supervision or enforcement tools in a variety of circumstances, and the selection and application of such tools are crucial to effective oversight. The CFPB continues to define and mature its tool selection process to promote consistency in its oversight of depository and nondepository institutions. The CFPB also continues to evaluate its human capital needs to ensure that it maintains a workforce with the requisite skills and expertise to support its strategy. Further, the CFPB continues to evaluate its technology needs to ensure they adequately support the effectiveness and efficiency of its supervisory and enforcement functions.

## Agency Action

SEFL has in place tool selection processes, including the Action Review Committee (ARC) Process. The ARC determines through a deliberative and rigorous process whether matters that originate from examinations will be resolved through confidential supervisory action or subject to investigation and resolution through a potential public enforcement action. Throughout FY 2022 the Division has continued to evaluate refinements to the ARC Process and other tool selection processes, as well as to consider new tool selection processes.

The CFPB is also taking steps to focus more supervisory efforts on nondepository institutions. In FY 2022 the CFPB finalized changes to the nonbank supervision procedural rule, in order to

provide transparency to the public about how the CFPB will exercise its authority under the Dodd-Frank Act to supervise a nonbank covered entity that it has reasonable cause to determine is engaging, or has engaged, in conduct that poses risks to consumers with regard to consumer financial products or services. The CFPB is also continuing to assess sources and capabilities that will provide an enhanced data-driven approach to its areas of supervisory focus. Leveraging additional data sources as well as artificial intelligence within the supervisory prioritization process has the potential to allow CFPB analysts to identify risk signals more efficiently and effectively throughout all institutional product lines under the CFPB's supervisory jurisdiction, especially at nondepository institutions that do not have traditional reporting sources and are far larger in number than depository institutions.

Additionally, the CFPB is also researching new supervisory technology tools to ensure it focuses its supervisory resources as effectively as possible, including at nondepository institutions. The CFPB is in the process of modernizing its Supervision and Examination System in order to provide increased functionality and efficiencies in the supervision and examination process. The CFPB is also seeking to partner with its state and federal counterparts to use the collective resources of the agencies and knowledge to be more efficient regulators.

Enforcement continues to monitor the ongoing developments associated with the pandemic and its broader effects on the economy and consumer financial marketplace to ensure it deploys its resources effectively in response to the fallout from the pandemic and its effects on consumers, particularly communities of color.

Enforcement is also continuing to assess its technology needs and improving on its technology tools to better allow a data driven approach to its investigations and matter management.

Responsible Executive: Associate Director, Supervision, Enforcement, & Fair Lending

Related Objectives: 1.2 and 1.3

Related Performance Measures: 1.2.7, 1.2.8, and 1.3.3

## 4. Managing consumer complaints

Under authority granted by the Dodd-Frank Act, the CFPB collects, monitors, and responds to complaints from consumers on financial services and products. The CFPB has identified the handling of consumer complaints as a mission-essential function that is critical to its strategic contingency planning efforts in its Continuity of Operations Plan. The CFPB's Office of Consumer Response receives complaints directly from consumers about the challenges they face

in the financial services and products marketplace and uses the complaint data to create reports for internal and external reporting. The number of complaints has continued to grow gradually since the creation of Consumer Response. Processing an increase in complaints during challenging times, such as the pandemic, may strain the CFPB's resources. Since its creation, the CFPB has received more than 4.5 million complaints, and more than 6,500 financial companies have responded to their customers through the CFPB's complaint process. Further, the monthly average complaint volume increased from about 29,000 complaints in 2019 to an average of approximately 82,000 complaints in 2021. Moreover, whereas Consumer Response handled approximately 352,400 complaints in 2019, it handled approximately 542,300 complaints in 2020 and approximately 994,400 complaints in 2021. As the pandemic persists, consumers will continue to experience problems such as incorrect credit report information, difficulty paying their mortgages, or difficulty paying their student loans, resulting in even more complaints. Consumer Response has also undergone multiple organizational shifts within the past four years, having moved from the Operations Division to the Consumer Education & Engagement Division and then to the newly created Division of Consumer Education & External Affairs. In addition, the CFPB has redistributed some of Consumer Response's resources to other divisions.

## Agency Action

In FY 2022, Consumer Response acknowledged this continued increase in complaint volume as a management challenge, as required by statute. At this time, the OIG has not recommended that Consumer Response change its current practices aimed at mitigating the challenge. As such, Consumer Response will continue to rely on its current processes and systems for routing complaints to financial services companies for response. In addition, Consumer Response has moved its call centers to a remote work environment to maintain continuity of services for consumers calling the CFPB. Consumer Response is continuing to monitor company response timeliness, enabling it to share and publish data about the timeliness of these responses. Although organizational shifts have reduced its available staff resources, Consumer Response expects that its scalable model can continue to handle increased complaint volume and does not anticipate the need to change the complaint process.

Responsible Executive: Associate Director, Consumer Education & External Affairs

Related Objective: 2.2

Related Performance Measures: 2.2.1, 2.2.2, 2.2.3, and 2.2.4

## Appendix D: Defined Terms

ACRONYM	DEFINED TERM
<b>ADR</b>	Alternative Dispute Resolution
<b>AES</b>	Annual Employee Survey
<b>APP</b>	Annual Performance Plan
<b>ARC</b>	Action Review Committee
<b>Board</b>	Board of Governors of the Federal Reserve System
<b>BPR</b>	Biannual Performance Review
<b>Bureau</b>	The Consumer Financial Protection Bureau
<b>Bureau Fund</b>	Bureau of Consumer Financial Protection Fund
<b>CFPA</b>	Consumer Financial Protection Act of 2010
<b>CFPB</b>	The Consumer Financial Protection Bureau
<b>CHCO</b>	Chief Human Capital Officer

ACRONYM	DEFINED TERM
<b>CISA</b>	Cybersecurity and Infrastructure Security Agency
<b>CPF</b>	Consumer Financial Civil Penalty Fund
<b>DAPS</b>	Disability and Accessibility Program Section
<b>DEIA</b>	Diversity, Equity, Inclusion, and Accessibility
<b>DHS</b>	U.S. Department of Homeland Security
<b>Dodd-Frank Act</b>	Dodd-Frank Wall Street Reform and Consumer Protection Act Public Law No. 111-203
<b>ECI</b>	Employment Cost Index
<b>ECP</b>	Examiner Commissioning Program
<b>eCRM</b>	CFPB's Engagement Management System
<b>EDM</b>	Enterprise Data Management

ACRONYM	DEFINED TERM
<b>EEO</b>	Equal Employment Opportunity
<b>ENForce</b>	Enforcement Matter Management System
<b>EO</b>	Executive Order
<b>ERM</b>	Enterprise Risk Management
<b>FDIC</b>	Federal Deposit Insurance Corporation
<b>FFIEC</b>	Federal Financial Institutions Examination Council
<b>FHFA</b>	Federal Housing Finance Agency
<b>FITARA</b>	Federal IT Acquisition Reform Act
<b>FFMIA</b>	Federal Managers' Financial Integrity Act of 1982
<b>FOIA</b>	Freedom of Information Act
<b>FTE</b>	Full-Time Equivalent

ACRONYM	DEFINED TERM
<b>FY</b>	Fiscal Year
<b>GAO</b>	Government Accountability Office
<b>GPRAMA</b>	GPRA Modernization Act
<b>HMDA</b>	Home Mortgage Disclosure Act
<b>HUD</b>	Department of Housing and Urban Development
<b>IAA</b>	Interagency Agreement
<b>ILSA</b>	Interstate Land Sales Full Disclosure Act of 1968
<b>IT</b>	Information Technology
<b>LEP</b>	Limited English Proficient
<b>MD</b>	Management Directive
<b>MFA</b>	Multi-factor Authentication

ACRONYM	DEFINED TERM
<b>MOU</b>	Memorandum of Understanding
<b>MWOB</b>	Minority and Women-owned Businesses
<b>NCUA</b>	National Credit Union Administration
<b>NDU</b>	National Defense University
<b>NICE</b>	National initiative for Cybersecurity Education
<b>NIST</b>	National Institution of Standards and Technology
<b>NSF</b>	Non-sufficient funds
<b>NSMO</b>	National Survey of Mortgage Originations
<b>NTEU</b>	National Treasury Employees Union
<b>OCC</b>	Office of the Comptroller of the Currency
<b>OCR</b>	Office of Civil Rights

ACRONYM	DEFINED TERM
<b>OEOF</b>	Office of Equal Opportunity and Fairness
<b>OHC</b>	Office of Human Capital
<b>OIG</b>	Office of Inspector General
<b>OMB</b>	Office of Management and Budget
<b>OMWI</b>	Office of Minority and Women Inclusion
<b>OPM</b>	Office of Personnel Management
<b>OR</b>	Office of Research
<b>OSM</b>	Office of Stakeholder Management
<b>POA&amp;Ms</b>	Plans of Action and Milestones
<b>RMR</b>	Division of Research, Monitoring, & Regulations
<b>SBL</b>	Small Business Lending

ACRONYM	DEFINED TERM
<b>SBREFA</b>	Small Business Regulatory Enforcement Fairness Act
<b>SEFL</b>	Division of Supervision, Enforcement, & Fair Lending
<b>SES</b>	Supervision and Examination System
<b>SSRN</b>	Social Science Research Network
<b>T&amp;I</b>	Technology and Innovation
<b>TCCP</b>	Terms of Credit Card Plans
<b>TESC</b>	Technical Executive Steering Committee
<b>US-CERT</b>	United States Computer Emergency Readiness Team