

Office of Minority and Women Inclusion Annual Report to Congress



Message from the Acting Director



The FY 2020 Office of Minority and Women Inclusion (OMWI) Annual Report to Congress reflects the Bureau's commitment to diversity and inclusion at all levels of the Bureau and to the diverse population of consumers we serve. Our employees' diversity in experiences and perspectives is essential to meeting the Bureau's mission. I am committed to ensuring that every employee's contribution is valued and respected. The inclusive environment at the Bureau facilitates our efforts to integrate diversity and inclusion in all our business activities. It is critical, now more than ever, that we recognize and repair the racial and economic inequality exacerbated by the public health crisis and looming economic crisis. We are committed to promoting diversity and inclusion in our own workplace, in the suppliers we do business with, and in the financial institutions we regulate. We will identify and act on opportunities to focus on economically vulnerable consumers across all racial differences in the work of the Bureau, while vigorously pursuing racial and economic justice.

The COVID-19 pandemic, the tragic death of George Floyd on May 25, 2020, and the racial justice movement have challenged our workforce. The Bureau continues to meet these challenges and directly deal with the complicated issues of race, equity, diversity, and inclusion by programming Bureau-wide activities and resources. During this time when many employees are feeling discouraged, these activities foster open communication and engagement and give employees an opportunity to translate their experiences into an increased understanding that positively affects their work.

Thank you for taking the time to read about our diversity and inclusion efforts at the Bureau. We will address racial and economic inequality with a renewed sense of urgency and focus across all the business activities of the Bureau. We know there is more work to be done and we are committed to continuing our progress.

Sincerely,

A handwritten signature in blue ink that reads "David K. Uejio". The signature is written in a cursive, flowing style.

David Uejio

Message from the OMWI Director



I am pleased to present the Bureau's FY 2020 Office of Minority and Women Inclusion (OMWI) Annual Report to Congress. The Bureau's diversity and inclusion work focuses on the mandates of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 342. We are committed to ensuring that diversity and inclusion are integrated into the Bureau's culture, business activities, and engagement with consumers and the entities we regulate.

Fiscal Year 2020 had its challenges but also many unexpected opportunities for growth in creating a more inclusive environment at the Bureau.

Over the past year, the Bureau saw an increase in minority representation in our workforce. We modified our recruitment strategy during the COVID-19 pandemic to maximize our presence at virtual conferences and on social media to reach a diverse population of candidates. The Bureau responded to the May 25, 2020, tragic death of George Floyd by implementing a dialogue series centered around race and equity themes and by providing learning resources for all employees. We implemented new standards to assess our contractors' Good Faith Effort compliance to include minorities and women in their businesses. We formally launched our online portal, *Inclusivity*, for regulated entities to submit their self-assessments. We also conducted independent research on the entities' public-facing diversity and inclusion data and their demonstrated commitment to diversity and inclusion.

The next year brings opportunities to continue our important work and to further integrate diversity and inclusion into the fabric of the Bureau as we enhance our focus on racial and economic equity. I look forward to meeting any challenges and exceeding expectations.

Sincerely,

A handwritten signature in blue ink that reads "Lora McCray". The signature is fluid and cursive, written in a professional style.

Lora McCray

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Executive Summary

The Bureau of Consumer Financial Protection (CFPB or Bureau) continues its commitment to prioritizing diversity and inclusion within the Bureau, with external stakeholders, and in all business activities. It is critical that the Bureau consider consumers of different backgrounds, cultures, perspectives, experiences, and interests and how they interact in the financial marketplace to ensure that the products and services we provide meet the needs of all consumers. In addition, our continued focus on growing a diverse workforce that reflects American consumers ensures that the regulations, policies, and financial solutions we create are relevant to all consumers.

2020 marked the 10-year anniversary of the passing of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which was created to protect consumers, investors, and the American economy. Offices of Minority and Women Inclusion (OMWIs) were created by Section 342 of Dodd-Frank to ensure accountability for diversity and inclusion in financial services. The Bureau has made significant progress to advance the mandates of Section 342 and ensure diversity and inclusion is an integral part of its culture and business activities. We will continue to focus on this work in the future.

The Bureau's diversity and inclusion strategy is based on Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act¹, Executive Order No. 13583², the updated Government-wide Diversity and Inclusion Plan issued by the Office of Personnel Management (OPM) in 2016, and on existing regulations and guidance from the Equal Employment Opportunity Commission (EEOC). The Bureau's strategy emphasizes integrated and ongoing diversity and inclusion best practices in all business activities to ensure sustainability.

The Bureau's diversity and inclusion initiatives, programs, activities, and messaging leverage the best practices in the fields of diversity and inclusion, human capital management, legal compliance, and by data. The Bureau uses several data sources to inform its diversity and inclusion strategy, including, but not limited to: The Annual Employee Survey (AES), particularly the Inclusion Quotient; and analyses of employee demographic data on hiring, promotions, separations, performance management, and training.

¹ <https://www.congress.gov/bill/111th-congress/house-bill/4173/text?r=19>.

² Executive Order No. 13583, 76 Fed. Reg. 52,847 (Aug. 18, 2011).

The Bureau's OMWI is housed in the Office of Equal Opportunity and Fairness (OEOF), along with the Office of Civil Rights (OCR), the Office of Fair Lending and Equal Opportunity (OFLEO), and the Bureau's Disability and Accessibility Program (DAP). OMWI has direct responsibilities for diversity and inclusion management at the Bureau and works in close collaboration with other Bureau offices to implement the Bureau's diversity and inclusion strategic plan. OMWI regularly collaborates with the Office of Human Capital (OHC), OCR, Bureau Operations, the Office of Procurement, and with the leadership of all Bureau divisions.

This report covers all the Bureau's efforts regarding diversity and inclusion during Fiscal Year 2020, unless otherwise noted. The report includes work led by OMWI, as well as work done in collaboration with partner Bureau offices—OCR, OHC, Office of Procurement, Bureau Divisions— and employee-led diversity and inclusion groups.

Workforce Diversity Highlights

Overall Bureau demographics have not changed significantly since FY 2019 when compared to the U.S. Census National Civilian Labor Force (CLF). In FY 2020, the Bureau saw a slight increase in both gender and ethnic/racial diversity in the workforce. In the total workforce, gender diversity rose from 49.8% to 50.2% and ethnic/racial diversity increased from 40.6% to 41.2%. A review of five-year trend data (2016-2020) shows female representation at the Bureau has been consistent at 50% throughout that time and minority representation has steadily increased from 37% to 41%. In FY 2020, representation in Bureau leadership continued to be notably positive. Forty-nine percent of executives were women, compared with 34% government-wide.³ And 37% of executives self-identified as minority, compared to 20.7% government-wide.

Workplace Inclusion Highlights

In FY 2020, the Bureau, for the safety of our employees, pivoted its diversity and inclusion messaging and programming to the digital environment and realigned its work to acknowledge racial injustice issues affecting our workforce. After the nationwide events that followed the death of Mr. George Floyd in May, the Bureau focused on providing race and equity programming and resources to Bureau employees. The Bureau participated in a governmentwide joint-OMWI event on race equity that had over 9,000 attendees. OMWI worked closely with Bureau Employee Resource Groups, the Diversity and Inclusion Council of Employees, and partner offices to recruit a diverse workforce through virtual conferences and meetings. Recognizing the importance of ongoing diversity and inclusion events in advancing

³ Senior Executive Service Report 2017. <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/federal-employment-reports/reports-publications/ses-summary-2017.pdf>.

the Bureau's continued goal to build an inclusive culture, OMWI hosted and coordinated twenty (20) heritage, commemorative, and race equity events in FY 2020.

In October, the Bureau submitted its diversity and inclusion curriculum to the Office of Personnel Management (OPM) as required by Executive Order (E.O.) 13950. In December, the Bureau was notified the majority of its training was compliant with the E.O.⁴

Supplier Diversity Highlights

The Bureau used both internal and external strategies to continue to successfully advance our engagement with Minority- and Women-owned Businesses (MWOBs) and steadily increase MWOB inclusion and spend. The Bureau continually looks for opportunities to increase business opportunities with businesses from underserved communities. In FY 2020, the Bureau spent \$42.9 million or 31.2% of its total contractor spend with MWOBs. This increase from the Bureau's spend of 28.9% with MWOBs in FY 2019, shows a continuing positive trend since FY 2017, when Bureau spend with MWOBs was 9.2%. In addition, the Bureau focused on collecting Good Faith Effort (GFE) compliance data from a sample of contractors and updated its GFE standards to better assess contractors' efforts to include minorities and women in their businesses.

Inclusion in Business Activities

The Bureau prioritized education, engagement, and partnerships to ensure diversity and inclusion were integrated into all our business activities. The Bureau educated youth with the *High School Scholars Internship Program* by providing Title One high school students with exposure to career opportunities in financial services and economics. The Bureau responded to the COVID-19 pandemic by enhancing financial products and services to underserved communities, such as Limited-English Proficient consumers and educated consumers on how to avoid pandemic-related scams. In addition, the Bureau shared financial resources and practical learning materials with underserved communities through outreach and recruiting events. The Bureau continues to evaluate opportunities to increase engagement with underserved communities and community-based organizations.

Regulated Entities

In FY 2020, the Bureau focused its industry diversity and inclusion efforts on conducting outreach on the self-assessment process to industry and by conducting research on entities' publicly available diversity and inclusion information. The Bureau launched the *Inclusivity* online data collection tool in February 2020, to enable regulated entities to easily submit their

⁴ Executive Order 13950 was rescinded by President Biden on January 20, 2021.

diversity and inclusion self-assessments. The Bureau continued its multi-pronged communication strategy, using direct outreach to financial institutions and working with industry trade associations to help engage financial institutions in the diversity and inclusion self-assessment process. In addition, the Bureau conducted research on the publicly available diversity and inclusion information, by industry segments, and shared that information with trade groups. The Bureau will use the data collected to provide diversity and inclusion best practices examples, resources, and peer success stories to financial institutions and work with the trade groups to encourage their members to adopt diversity and inclusion best practices.

The Bureau made noteworthy progress in its diversity and inclusion efforts in FY 2020, but we recognize that there is more work to be done. With strong committed leadership, the Bureau is well positioned to continue this progress.

Key accomplishments and challenges:

Accomplishments

The Bureau made steady progress in its diversity and inclusion efforts in FY 2020. The following are the Bureau's key accomplishments in FY 2020:

- The Bureau expanded its diversity and inclusion strategic planning to include “360” meetings with division leaders to bring greater awareness of diversity and inclusion issues in each Division to leaders, and foster accountability for leadership in advancing diversity and inclusion throughout the agency.
- The Bureau achieved significant growth in dollars spent with MWOBs. In FY 2020, the Bureau spent \$42.9 million (31.2% of the total spent) on MWOBs. This is a notable increase from the Bureau's spend of 28.9% with MWOBs in FY 2019. In FY 2020, procurement dollars spent by the Bureau increased in every MWOB category.
- The Bureau formally launched the *Inclusivity* online portal to make it easier for financial institutions to submit their diversity and inclusion self-assessments. As of December 4, 2020, 23 financial institutions submitted assessments despite delays caused by the pandemic.
- The Bureau held 20 diversity and inclusion cultural and education events in FY 2020 to raise awareness and advance cultural intelligence. The events covered a range of topics, including: The Black wealth gap, gender identity, and issues the LGBTQ+ and minority communities face in consumer protection.
- In January 2020, the Bureau launched the *Mentoring for Success* program to provide

guidance and support for staff development. The program included 35 mentor/protégé matched pairs, a Leadership Speaker series, and discussion sessions on career development topics. Feedback on the program has been overwhelmingly positive.

- In July 2020, the Bureau joined the Office of the Comptroller of the Currency (OCC) and the National Union Credit Association (NCUA) to participate in the 2020 *High School Scholars Internship Program (HSSIP)* in partnership with the District of Columbia’s Department of Employment Services, Marion S. Barry Summer Youth Employment Program. Through the six-week, paid enrichment opportunity, the Bureau sponsored 10 rising seniors from Eastern and Roosevelt Senior High Schools in the District of Columbia. The program provided the students with an opportunity to build business skills and gain exposure to the financial services arena.
- In response to the death of George Floyd on May 25, 2020, the Bureau partnered with peer agencies to plan and deliver a federal financial multi-agency OMWI webcast titled *Beyond Words: Race, Work, and Allyship Amid the George Floyd Tragedy* on June 24.
- The Bureau created the *OMWILearn More/Take Action Dialogue Series* centering around racial equity themes and topics. The series assisted employees in dealing with the events relating to the death of George Floyd. OMWI also created racial equity learning resources for Bureau employees on topics such as bias, privilege, and allyship, and provided Bureau managers with guidance and resources for addressing racial issues in the workplace.
- The Bureau ranked 14th in the *Careers & the disABLED* magazine’s Annual “Top 20 Government Employers” for persons with disabilities, climbing up one position from its 2019 ranking.

Challenges

Although the Bureau made significant progress on diversity and inclusion initiatives in FY 2020, there is still more we want to accomplish. Below are a few of the challenges for future focus:

- While 49% of executives at the Bureau are women, overall, only 37% of all executives are minorities. Minority representation at the Executive level continues to be a growth opportunity for the Bureau. We are conducting barrier analyses to examine any barriers that may be preventing minority employees from advancing into management positions and creating development opportunities through details and development programs like *Mentoring for Success*.

- The Bureau’s overall gender and racial/ethnic representation is above most financial regulatory peers; diversity across pay band presents a challenge. The workforce data shows minority representation decreases as the grade levels increase. And with one of our mission critical positions, the CN-51 level and below is comprised of 83% women and 70% minorities.
- To address these challenges OMWI is working with Bureau divisions and the Office of Human Capital on diversity and inclusion strategic planning to assess workforce gaps, create development opportunities, reduce bias in hiring and promotions, and educate decision makers on the value of diversity in their teams and their work.
- Currently the diversity self-assessment process is voluntary, and some institutions are reluctant to submit data because of concerns about data privacy. To mitigate this, the Bureau is conducting an extensive outreach campaign to educate financial institutions about the purpose of the self-assessment process and how the data collected will be used. Our goal is to aggregate the information collected and use it to identify and share best practices and success stories with financial institutions. The Bureau is also partnering with trade groups to encourage entities to complete and submit self-assessments and adopt diversity and inclusion best practices. Trade groups have been decidedly receptive to this approach.

Workforce Diversity

The Bureau is committed to advancing diversity and inclusion in the workplace as mandated in Section 342 of the Dodd-Frank Act. The CFPB Diversity and Inclusion Strategic Plan (2018-2022)⁵ requires the organization “to maintain a talented, diverse, inclusive, and engaged workforce.” A close examination of the Bureau’s workforce diversity demographics is an essential part of developing ongoing strategies to increase diversity in hiring, promotions, and retention.

Demographics of Current Workforce

In FY 2020, the Bureau had a total workforce⁶ of 1503⁷ employees compared with 1424 in FY 2019⁸. The majority of the workforce is concentrated at the CN-60 level at 27%. The Bureau saw a slight increase in both gender and ethnic/racial⁹ diversity in the workforce. In the total workforce, gender diversity rose from 49.8% to 50.2% and ethnic/racial diversity increased from 40.6% to 41.2%. With respect to gender diversity, nearly half (48%) of the women at the Bureau identify as a minority, compared to 34% of men.

TABLE 1: OVERALL DEMOGRAPHICS – TOTAL WORKFORCE

CN-51 and Below	CN-52	CN-53	CN-60	CN-71	Senior Level	Total ¹⁰
232	158	311	404	335	63	1503
15%	11%	21%	27%	22%	4%	100%

⁵ CFPB Diversity and Inclusion Strategic Plan FY 2018-2022.

https://files.consumerfinance.gov/f/documents/cfpb_strategic-plan_fy2018-fy2022.pdf

⁶ Total workforce encompasses employees on permanent and temporary appointments, including interns (if any).

⁷ The total of 1503 is made up of 1429 permanent employees and 74 temporary employees.

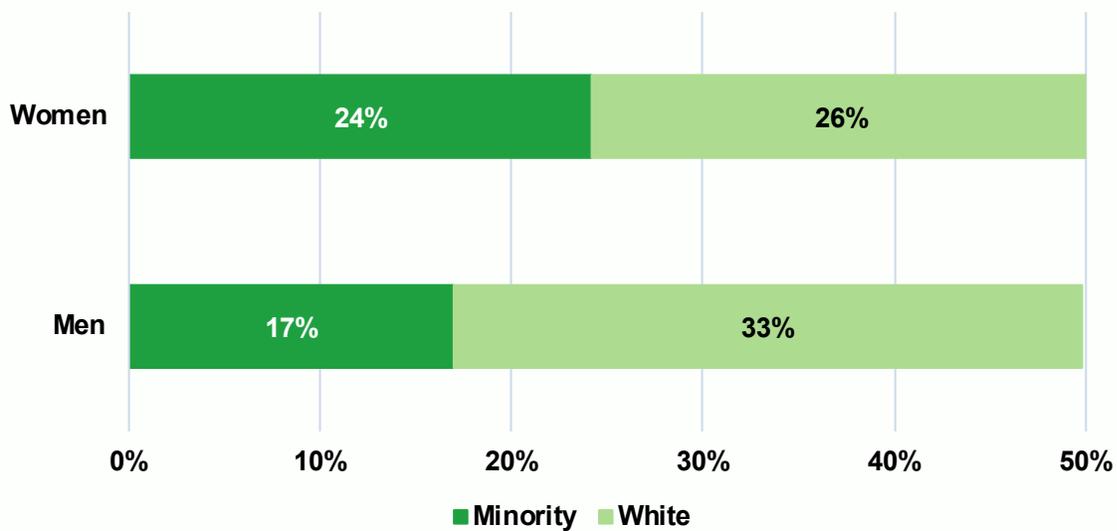
⁸ Data as of September 30, 2020. Workforce numbers for FY 2019 included in this FY 2020 OMWI Annual Report may differ slightly from corresponding data reported in the FY 2019 OMWI Annual Report. This is due to retroactive processing of personnel actions, late processing of personnel actions, or other changes made in applicable data systems since the data was finalized for the FY 2019 OMWI Annual Report.

⁹ ERI: OPM uses Ethnic and Race Indicator (ERI) to include employees who are Hispanic, Black, Asian, Native Hawaiian/Other Pacific Islander (NH/OPI), American Indian/Alaska Native (AI/AN) and employees of Two or More races. See <https://www.fedscope.opm.gov/rno/eri.asp>.

¹⁰ Note: Total percentages may not always total 100% due to rounding.

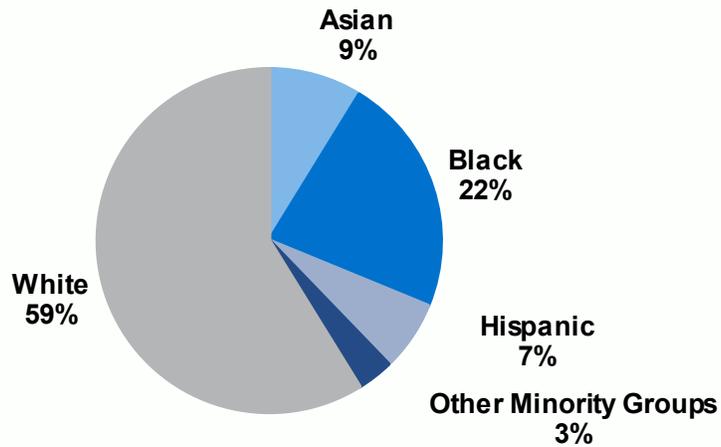
Overall Bureau demographics have not changed significantly since FY 2019 when compared to the U.S. Census National Civilian Labor Force (CLF)¹¹. White men followed by White women continue to make up the largest racial groups in the Bureau. Almost all ethnic/racial groups have higher representation in the Bureau workforce than their CLF benchmarks. Notable exceptions are American Indian/Alaska Native and Hispanic/Latino. These groups' representations are lower than their respective CLF percentages. Hispanics make up approximately 7% of Bureau employees compared to 10% of the CLF.

FIGURE 1: TOTAL WORKFORCE REPRESENTATION



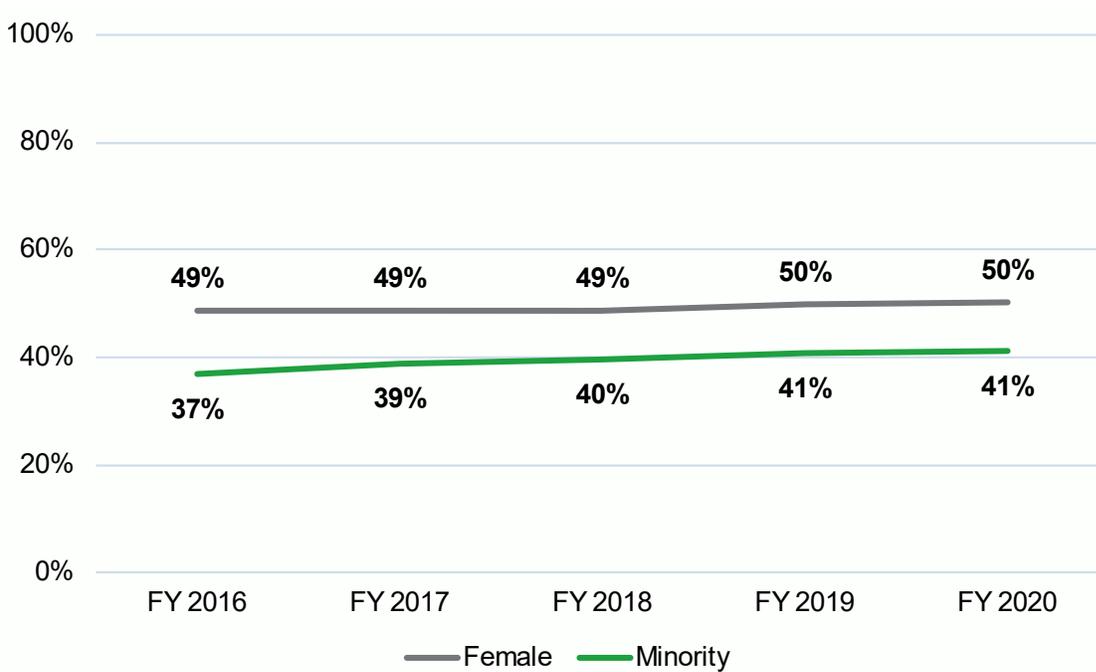
¹¹ The CLF is derived from the 2006-2010 American Community Survey (ACS) Equal Employment Opportunity Tabulation (EEO Tabulation). The EEO Tabulation was originally released by the U.S. Census Bureau on November 29, 2012. It provides external benchmarks to assist federal agencies in monitoring employment practices and enforcing workforce civil rights laws. Federal agencies are required to use the EEO Tabulation in preparing their annual MD-715 EEO Program Status reports. See https://www1.eeoc.gov/federal/directives/tech_assistance_06-10_EEO_tabulation.cfm.

FIGURE 2: REPRESENTATION OF THE TOTAL WORKFORCE



In reviewing our five-year trend data, female representation at the Bureau has been consistent at nearly 50% throughout that time and minority representation has steadily increased from 37% to 41%.

FIGURE 3: REPRESENTATION OF WOMEN AND MINORITIES FROM FY 2016 TO FY 2020



Overall Workforce Representation by Pay Band

The Bureau has a fairly even distribution of men and women across grade level. While minority representation at the Bureau overall is around 41%, minority representation decreases at the senior grade levels; most notably at the CN-71 and executive levels.

FIGURE 4: REPRESENTATION BY PAY BAND FOR THE TOTAL WORKFORCE

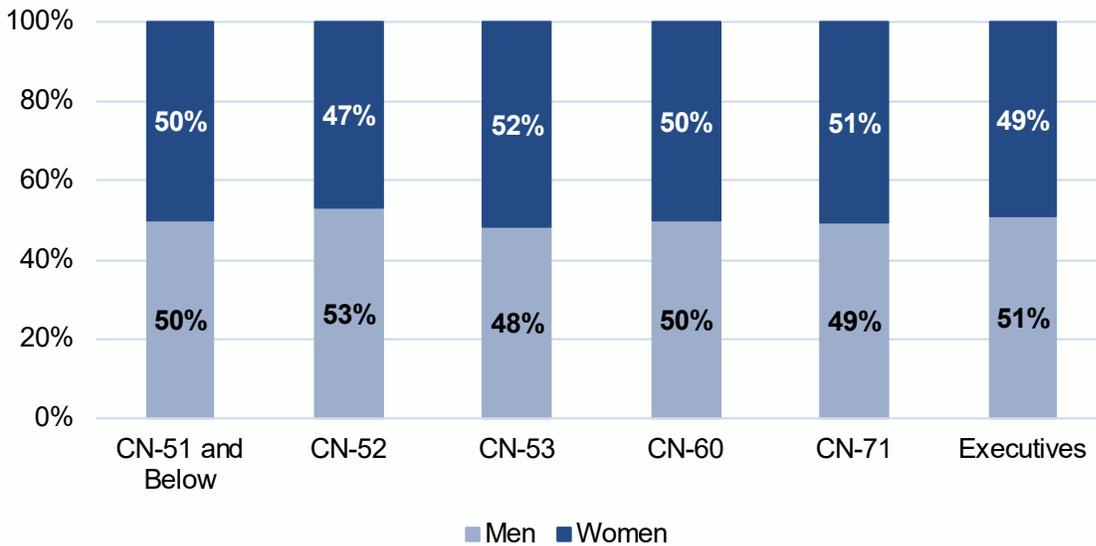
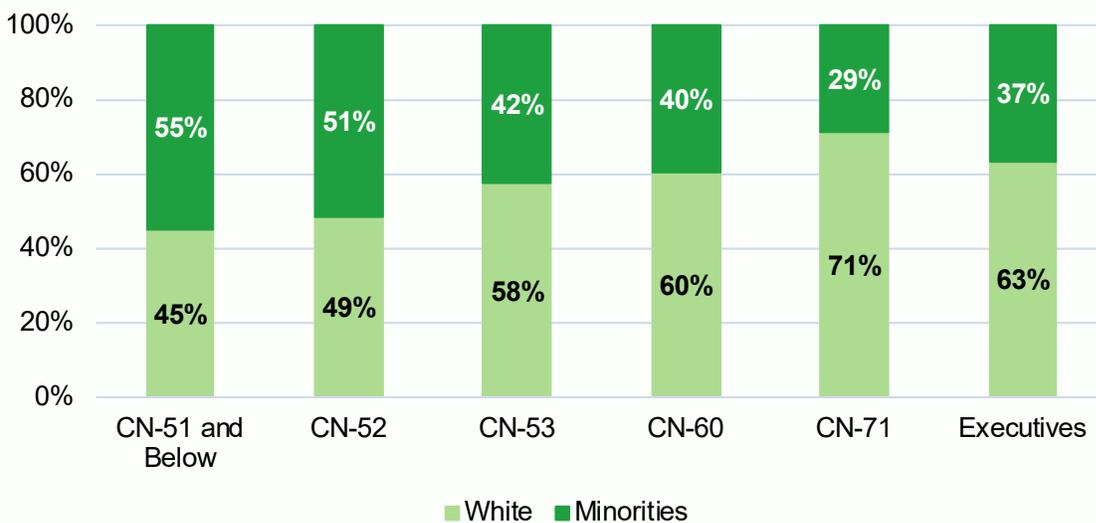


FIGURE 5: MINORITY REPRESENTATION BY PAY BAND FOR THE TOTAL WORKFORCE

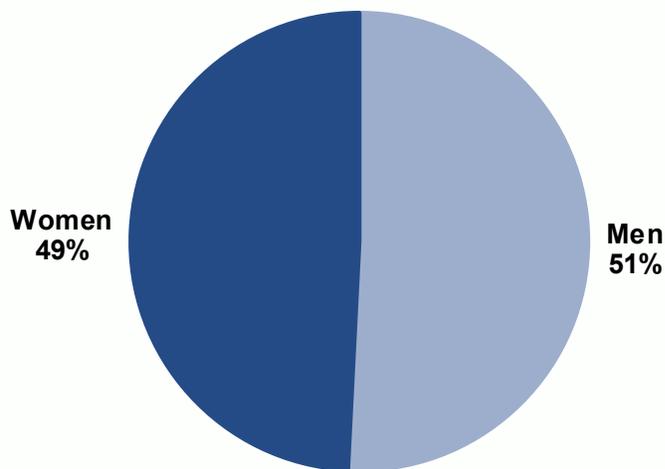


Leadership Diversity- Total Workforce

(CN-81, CN-82, CN-90 and the Director)

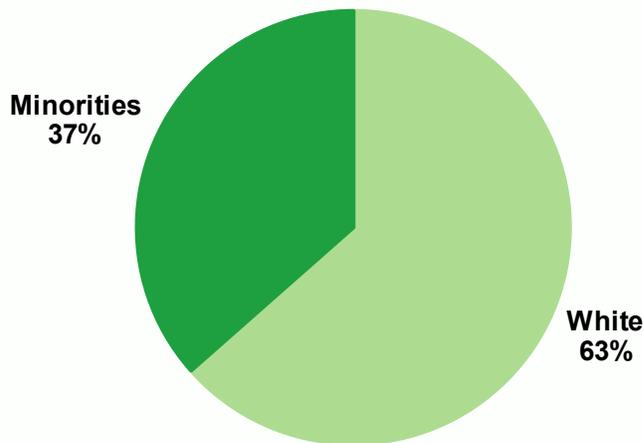
In FY 2020, representation in Bureau leadership continued to be notably positive. Forty-nine percent of executives were women (31 out of 63), compared with 33.9% government-wide.¹² And 37% of executives self-identified as minority (23 out of 63), compared to 21.2% government-wide.

FIGURE 6: GENDER REPRESENTATION FOR EXECUTIVES



¹² Senior Executive Service Report Fiscal Year 2014-2018. <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/federal-employment-reports/reports-publications/ses-summary-2014>.

FIGURE 7: MINORITY REPRESENTATION FOR EXECUTIVES



Demographics of Mission Critical Occupations

The Bureau has four mission critical occupations that make up some of our largest occupation categories: Miscellaneous Administration and Program Series, Economists, Examiners, and General Attorneys.

In FY 2020, gender and ethnic/racial diversity in the four mission critical occupations for the permanent workforce were:

- Miscellaneous Administration and Program Series: 48% minorities; 57% women;
- Economists: 32% minorities; 42% women;
- Examiners: 44% minorities; 35% women;
- General Attorneys: 26% minorities; 54% women.

In FY 2020, gender and ethnic/racial diversity stayed steady or increased slightly among most of the mission critical positions. Notable changes: Representation of women Economists increased from 33% in FY 2019 to 42% in FY 2020 and minority Economists increased from 26% in FY 2019 to 32% in FY 2020. The Miscellaneous Administrative Program series is the most diverse, with nearly half the employees being ethnically/racially diverse and more than half are women.

Miscellaneous Administration and Program Series

Notably, in FY 2020, most Administration and Program Series positions are at the CN-53 grade level (30%), but the largest representation of women and minorities in this series are CN-51 and below.

Minorities are overrepresented in the lowest grade levels, 70% at the CN-51 and below, compared with 48% overall. Women are also overrepresented at the lowest grade levels, 83% at CN-51 and below compared to 57% overall.

In FY 2020, for the Miscellaneous Administration and Program Series, gender diversity in this group remained flat for the permanent workforce compared with FY 2019, at 57%. Ethnic/racial diversity decreased 1% from FY 2019 to 48% in FY 2020. Overall, across grade levels, the percentage of women were well represented compared with men except at the senior level (41%). Overall, minority representation steadily decreased as the grade level increased up to the CN-60. The CN-60 level showed a dramatic drop in minority representation from 51% at CN-53 to 36% at CN-60. Minority representation began to tick back up between grade levels CN-60 and CN-71 as well as between grade CN-71 and the senior level.

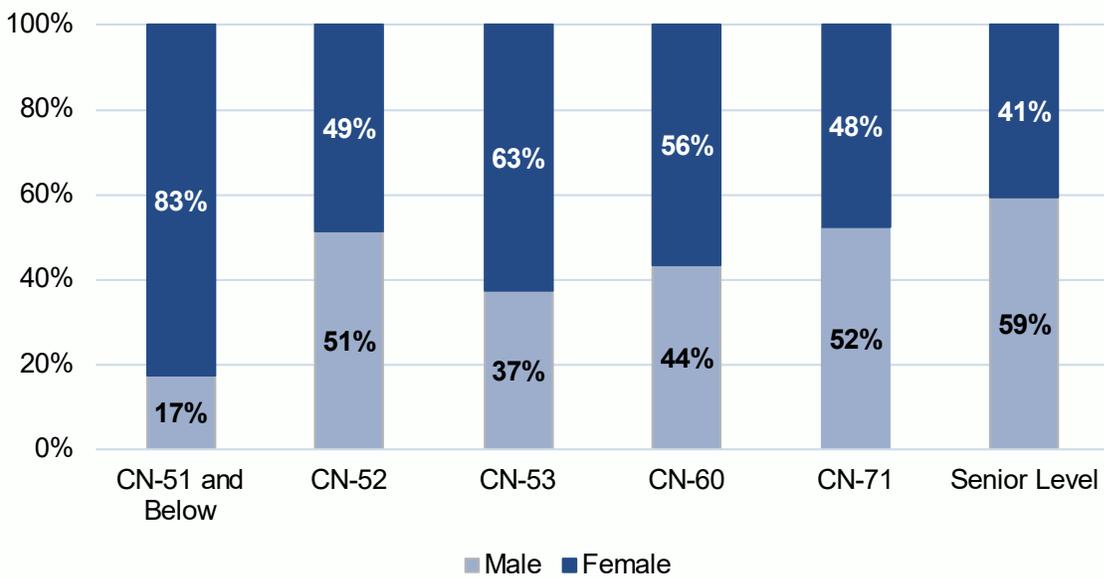
The percentage of each ethnic/race group is higher than their respective Occupational Civilian Labor Force¹³ percentage, except American Indian/Alaska Native, Hispanic/Latino and White. The percentage of women at 57% is lower than their respective Occupational Civilian Labor Force (OCLF) percentage of 63%.

¹³ The Occupational Civilian Labor Force (OCLF) is derived from the 2006-2010 American Community Survey (ACS) Equal Employment Opportunity Tabulation (EEO Tabulation). The U.S. Census Bureau originally released the EEO Tabulation on November 29, 2012. It provides external benchmarks to assist federal agencies in monitoring employment practices and enforcing workforce civil rights laws within specific occupational series. Federal agencies are required to use the EEO Tabulation in preparing their annual MD-715 EEO Program Status reports. The crosswalk between OPM occupational series and Census codes is found here: <https://www.eeoc.gov/federal/directives/00-0909pmcode.cfm>.

TABLE 2: MISCELLANEOUS ADMINISTRATIVE AND PROGRAM (0301 SERIES) – PERMANENT WORKFORCE¹⁴

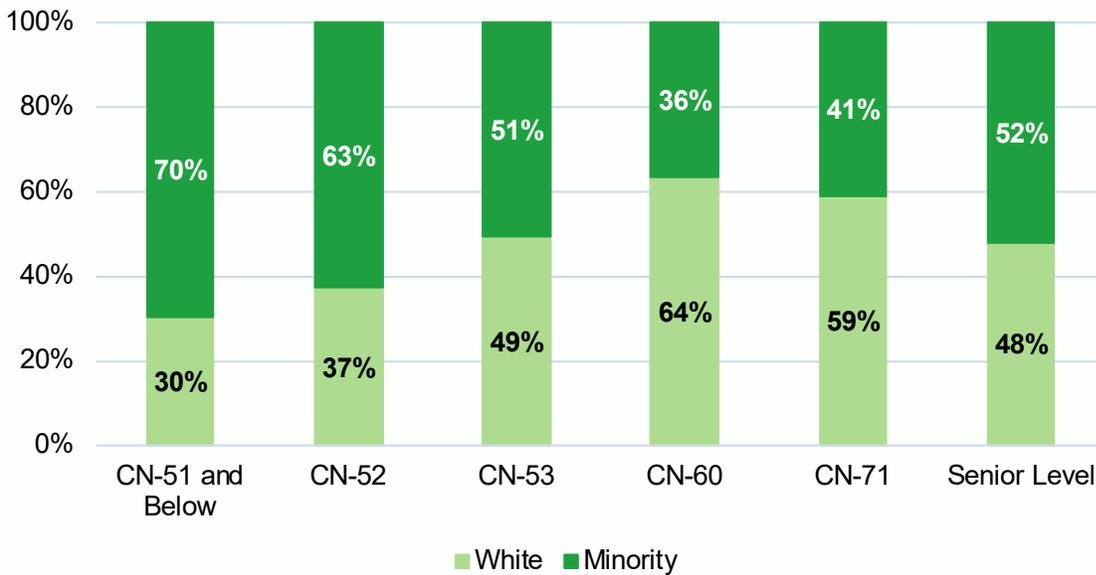
CN-51 and Below	CN-52	CN-53	CN-60	CN-71	Senior Level	Total
23	35	91	85	44	27	305
8%	11%	30%	28%	14%	9%	100%

FIGURE 8: GENDER REPRESENTATION BY GRADE LEVEL FOR MISCELLANEOUS ADMINISTRATIVE AND PROGRAM OCCUPATION



¹⁴ The nine temporary employees for this occupational series were not included.

FIGURE 9: MINORITY REPRESENTATION BY GRADE LEVEL FOR MISCELLANEOUS ADMINISTRATIVE AND PROGRAM OCCUPATION



Economists

Economists are the smallest group of the Bureau’s four mission critical occupations, numbering just 31 in the permanent workforce; they represent approximately two percent of the Bureau’s permanent workforce.¹⁵ In FY 2020, for Economists, the overall percentage of minorities in the permanent workforce increased to 32% from 26% in FY 2019 to include Asian, Hispanic, individuals of two or more races, and White. The percentage of women has increased by approximately 9% from 33% in FY 2019 to 42% in FY 2020. The Bureau continues to increase diversity in the Economist mission critical occupation, but the small number of employees decreases its impact on overall demographics.

¹⁵ There are ten additional Economists in the temporary workforce; 50% women and 20% minorities.

FIGURE 10: ECONOMIST GENDER REPRESENTATION (0110 SERIES)

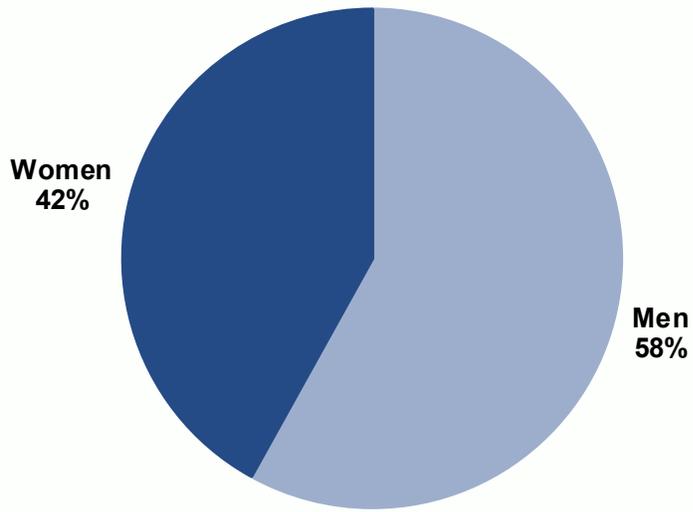
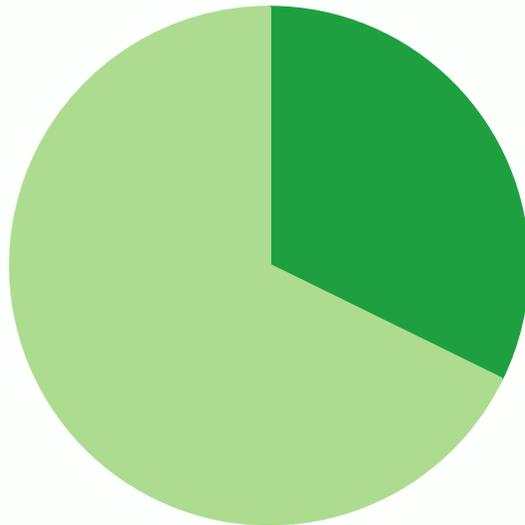


FIGURE 11: ECONOMIST MINORITY REPRESENTATION



Examiners

In FY 2020, for Examiners, gender diversity increased in the permanent workforce by approximately 1% since FY 2019 to 35% women. Ethnic/racial diversity remained flat compared with FY 2019 at 44% minorities. The percentage of each ethnic/race group is higher than their respective Occupational Civilian Labor Force (OCLF) percentage except for Asian employees (7% versus 8% OCLF) and White employees. The percentage of women at 35% is lower than their respective OCLF percentage of 45%.

The majority of Examiner positions are at the CN-53 level. Across pay bands, CN-53 has the highest representations of women (43%) and CN-51 and below has the highest representation of minorities (51%). Beyond the CN-53 level, an increase in pay band corresponds with a decrease in representation of minorities and women, with a dramatic drop to 14% in gender diversity at the CN-71 level and no representation of minorities at the senior level.

TABLE 3: EXAMINERS (0570 SERIES) – PERMANENT WORKFORCE¹⁶

CN-51 and Below	CN-52	CN-53	CN-60	CN-71	Senior Level	Total
111	60	47	121	22	4	365
30%	16%	13%	33%	6%	1%	100%

¹⁶ There are zero Examiners in the temporary workforce.

FIGURE 12: GENDER REPRESENTATION BY GRADE LEVEL FOR EXAMINERS

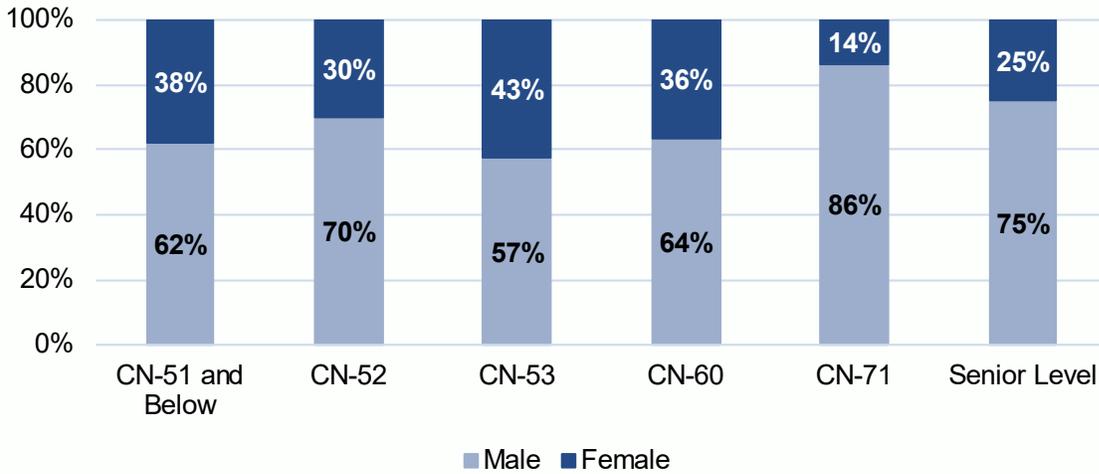
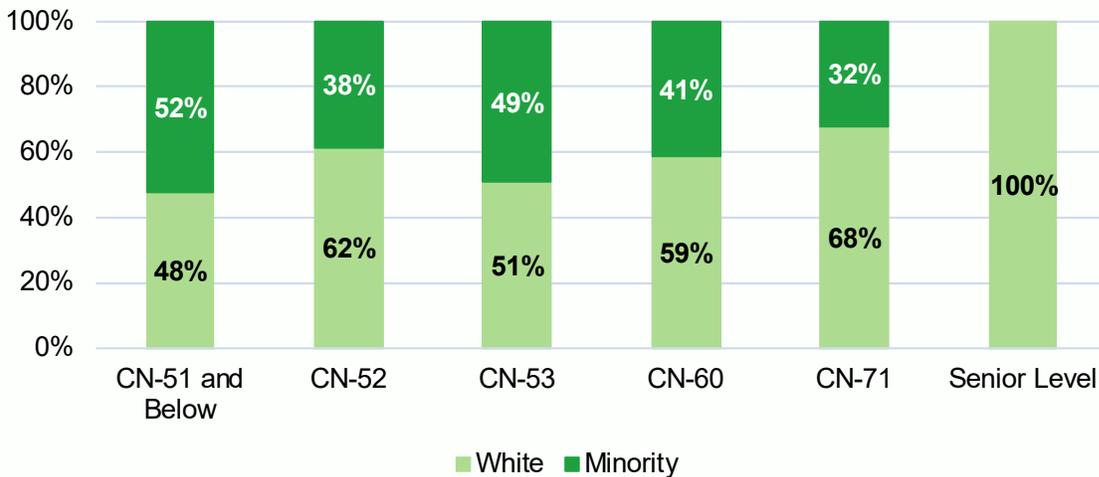


FIGURE 13: MINORITY REPRESENTATION BY GRADE LEVEL FOR EXAMINERS



General Attorneys

In FY 2020, General Attorneys’ overall percentages of minorities and women in the permanent workforce have remained steady when compared with FY 2019. The percentage of each ethnic/racial group is higher than their respective OCLF¹⁷ percentage except for American

¹⁷ EEOC Classification Table. <https://www.eeoc.gov/federal-sector/management-directive/eeoc-federal-sector-occupation-cross-classification-table>

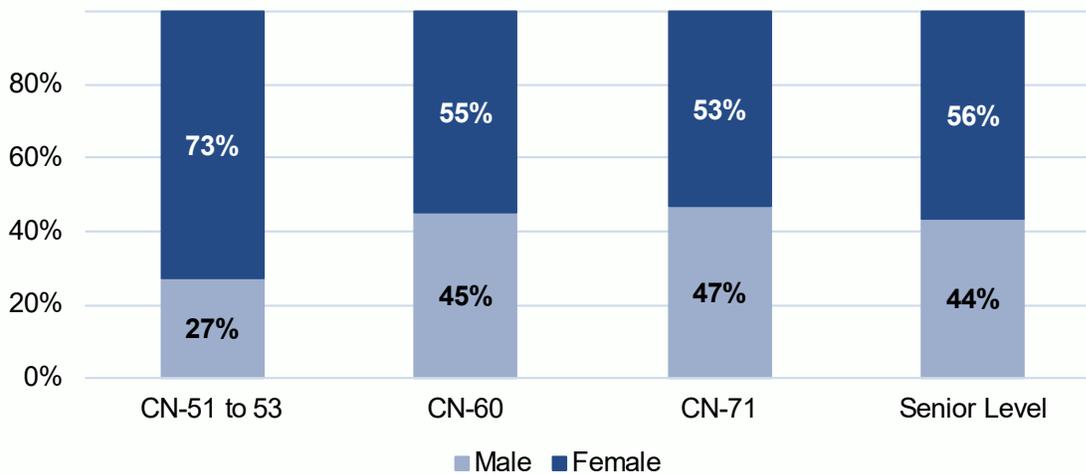
Indian/Alaska Native and White employees. The percentage of women at 54% is significantly higher than the OCLF of 33%.

The majority (76%) of the Attorney positions are at CN-71 level and the representation is 25% minorities and 53% women. The highest concentration of women is at the CN-51 to 53 level at 73%. There is a higher representation of minorities at the CN-60 and senior levels at 31%. Women make up the majority of every grade level grouping; however, the percentage of women is substantially lower at the senior level in FY 2020 than in FY 2019. It dropped from 71% to 56%. Also, minority representation for the CN-51 to CN-53 levels were lower in FY 2020 (27%) compared with FY 2019 (44%). However, minority representation in the CN-60 and 71 levels were both up slightly from FY 2019.

TABLE 4: ATTORNEYS (0905 SERIES) – PERMANENT WORKFORCE¹⁸

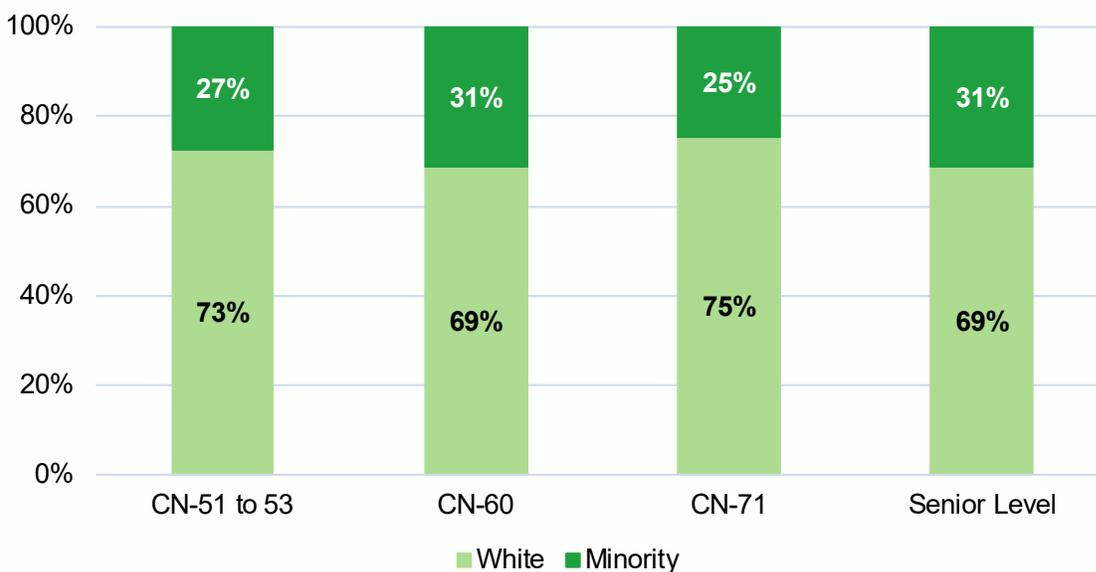
CN-51 to 53	CN-60	CN-71	Senior Level	Total
11	42	224	16	293
4%	14%	76%	5%	100%

FIGURE 14: GENDER REPRESENTATION BY GRADE LEVEL FOR ATTORNEYS



¹⁸ There are four Attorneys in the temporary workforce.

FIGURE 15: MINORITY REPRESENTATION BY GRADE LEVEL FOR ATTORNEYS



Demographics of New Hires and Separations

New Hires

In FY 2020, of the 126 new permanent employees, women and minorities represented 55% and 35.7%, respectively. The minorities hired included 9.5% Asian new hires, 19.8% Black new hires, 4% Hispanic/Latino, and 2.4% who identify as Two or More Races. In comparison, in FY 2019¹⁹, 55% of the permanent new hires were women and 40% were minorities.

The minorities hired included 7.5% Asian new hires, 22.5% Black new hires, 5% Hispanic/Latino, 2.5% American Indian/Alaska Native and 2.5% who identify as Two or More Races.

In FY 2020, the Bureau hired 61 new employees on temporary appointments. There were 37 men (61%) and 24 women (39%). Of these new employees, 36% were minorities. Twenty-five of the temporary hires were Pathways interns, 15 were Director’s Financial Analysts (DFAs), seven

¹⁹ The Bureau maintained a hiring freeze for the first 10 months of FY 2019. During that time, the Director granted 186 hiring exceptions for positions requiring specialized skills or needs for mission critical projects.

were Honors Attorneys or Law Clerks, three were Research Assistants, one was a Schedule C appointee, and the other ten were in various occupations. Of the Honors Attorneys and DFAs hired, 40% were women and 60% were minorities.

With respect to building a pipeline, in FY 2020, the Bureau hired 25 Interns through the Pathways internship program. This group consisted of seventeen (17) Program Assistants and eight (8) student trainees. Thirty-two percent (32%) of the Interns were women and 24% were minorities. None of the Interns were converted to permanent employees in FY 2020. In addition, the Bureau sponsored 10 D.C. high school students through the High School Scholars Internship Program (HSSIP), which we participated in for the first time.

Separations

The number of permanent employees who separated from the Bureau in FY 2020 was 80; less than the previous two fiscal years. Of the permanent employees who separated in FY 2020, there were slightly more women (52.5%, 42 permanent employees) than men (47.5%, 38 permanent employees). Women separated at a slightly higher rate (52.5%) than their representation in the permanent workforce (50.3%). Minorities separated at a lower rate (36%) than their representation in the permanent workforce (41%). Minorities also separated at a lower rate than white employees.

FIGURE 16: FY 2020 NEW HIRES AND SEPARATIONS BY GENDER (PERMANENT WORKFORCE)

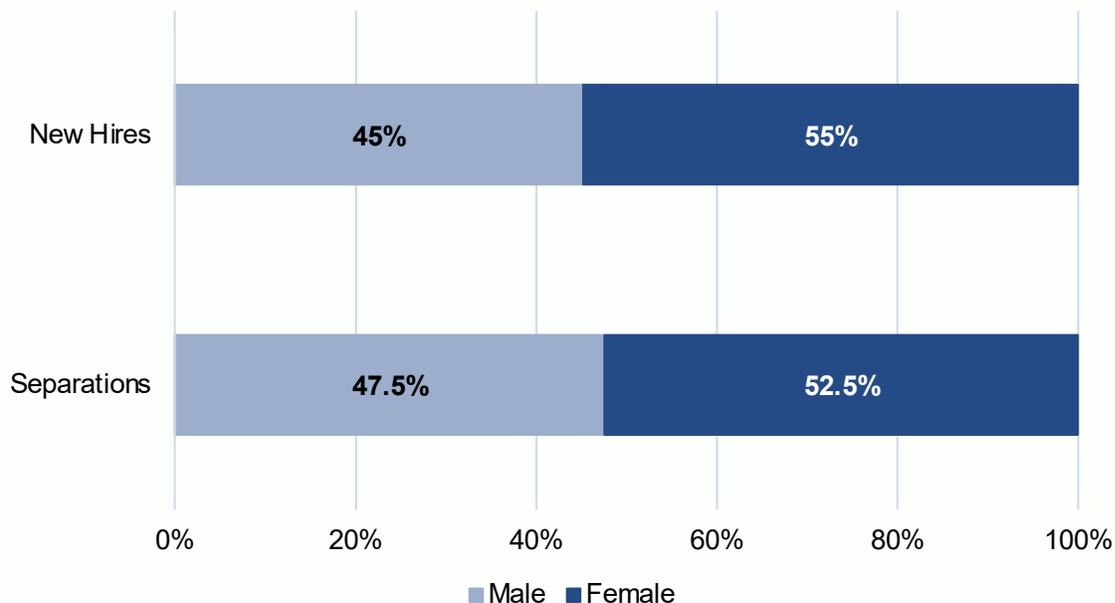
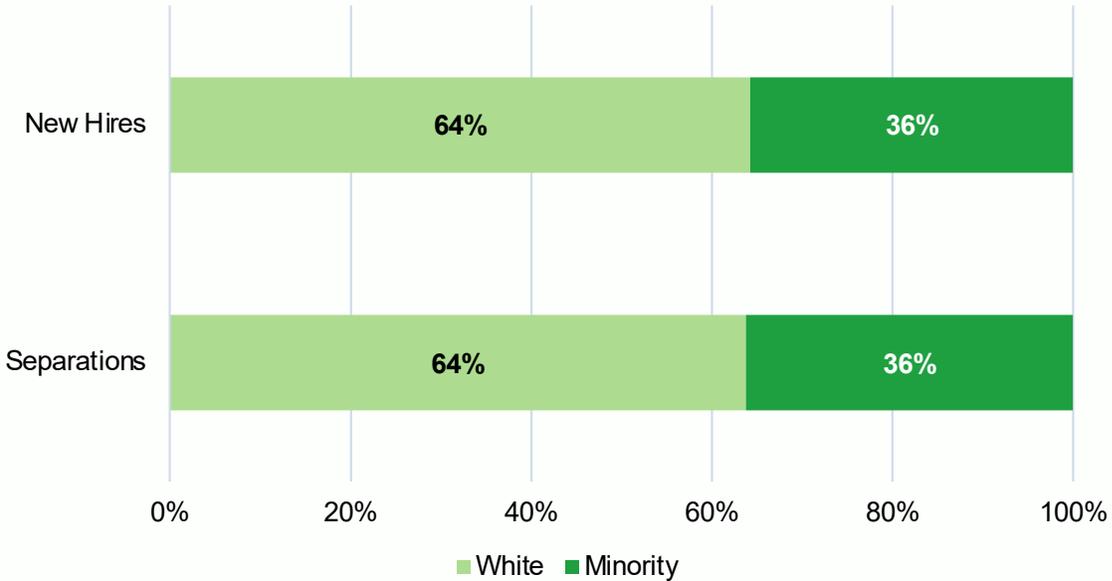


FIGURE 17: FY 2020 NEW HIRES AND SEPARATIONS BY MINORITY REPRESENTATION (PERMANENT WORKFORCE)



Permanent separations were nearly split between pay bands CN-53 and below (47.5%; 38) and CN-60 and above (52.5%; 42) with a nearly identical breakdown as FY 2019. Women made up 58% of the separations at the CN-53 and below, whereas men made up slightly more than half of the separations at the CN-60 and above. Minorities made up 53% of the separations at the CN-53 and below and 21% of the separations at the CN-60 and above.

FIGURE 18: FY 2020 SEPARATIONS BY GENDER AND GRADE LEVEL GROUPING (PERMANENT WORKFORCE)

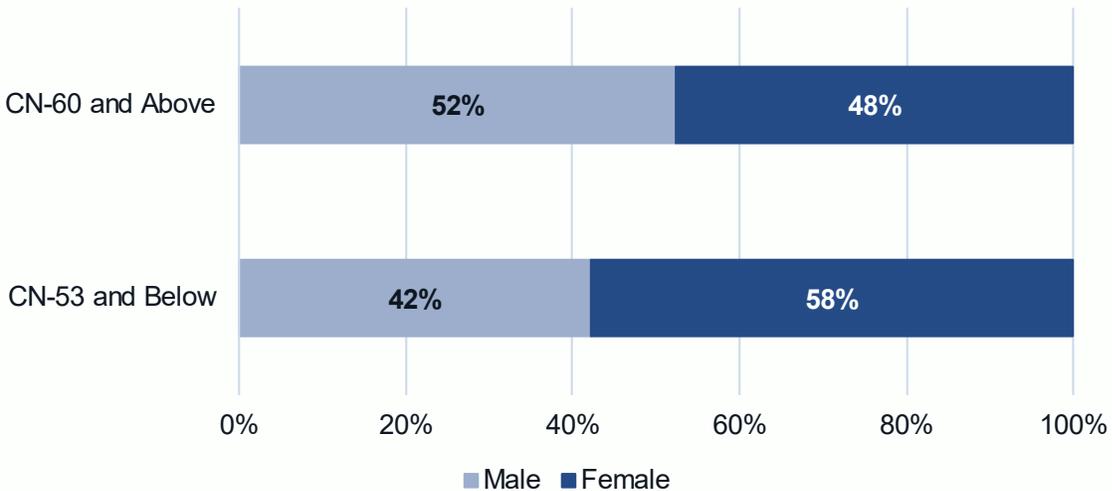
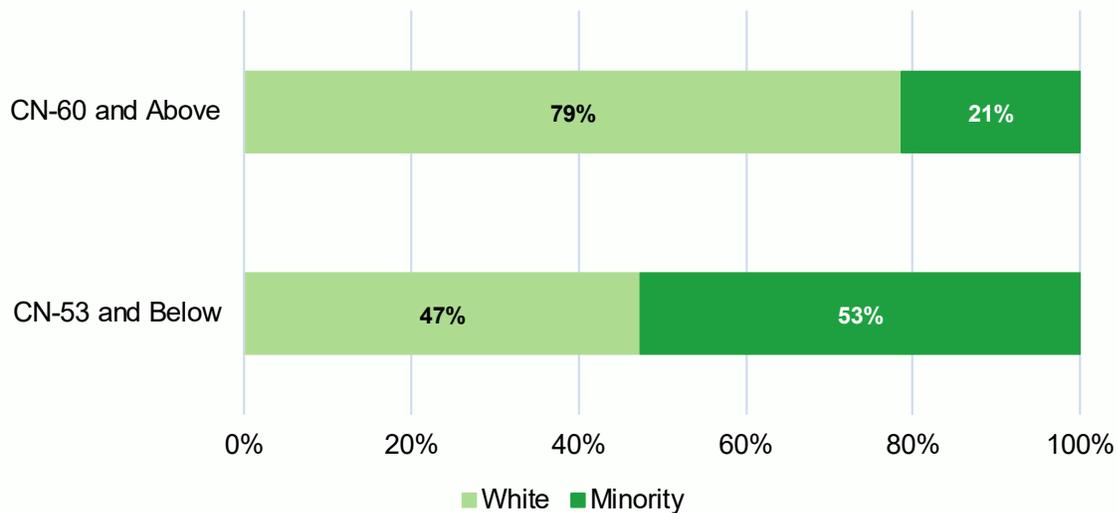


FIGURE 19: FY 2020 SEPARATIONS BY MINORITY REPRESENTATION AND GRADE LEVEL GROUPING (PERMANENT WORKFORCE)



Demographics of Promotions

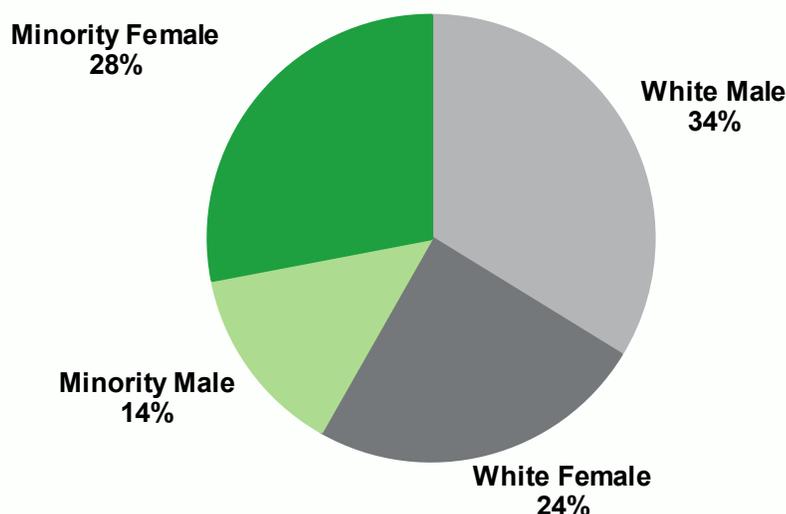
Employees at the Bureau can receive a permanent or temporary promotion²⁰ through the competitive process (e.g., apply for a promotion and are selected) or through the non-competitive process (e.g., on a career ladder and receive a promotion to the next pay band).

There were 225 total promotions in the workforce in FY 2020. Women received promotions at a rate slightly higher than their representation in the Bureau's workforce. Women, who make up 50% of the Bureau's total workforce, received 52% of the total promotions, which was the same as FY 2019. Employees from a minority group²¹ received 42% of promotions, which is nearly identical to their representation in the Bureau's total workforce (41.2%).

²⁰ For purposes of this report and related tables, a promotion is defined as a change to a higher pay band (e.g., CN-51 to CN-52).

²¹ Minorities include employees who are Hispanic, Black, Asian, Native Hawaiian/Other Pacific Islander (NH/OPI), American Indian/Alaska Native (AI/AN) and employees of Two or More races.

FIGURE 20: FY 2020 PROMOTIONS BY GENDER AND MINORITY REPRESENTATION



Strategies to Increase Workforce Diversity

To address the workforce diversity challenges identified through our analysis of Bureau demographics, the Bureau engages in a broad range of strategies of recruitment and workforce development. FY 2020 efforts to increase workforce diversity at the Bureau included:

Recruitment

The Bureau strives to recruit a qualified, diverse, and inclusive workforce that reflects the consumers we serve and has developed and implemented a diversity-focused recruiting effort. The Bureau seeks out opportunities to participate with minority- and women-focused organizations. Together, the OMWI, Office of Human Capital, Employee Resource Groups, and the Diversity and Inclusion Council of Employees represent the Bureau at the events and conferences of colleges and universities, trade associations, and professional organizations.

Digital Recruitment: In FY 2020, the Bureau focused primarily on digital recruitment and participation in virtual outreach events. The Bureau revised its digital recruitment strategy to maximize its presence at outreach and recruitment events and to enhance its brand. The strategy included posting on social media sites such as LinkedIn, eQuest, and Handshake to allow for direct ongoing connections with wide-range and diverse audiences. The strategy also included efforts directed to reach veterans and applicants with disabilities to assist in filling the

Bureau's workforce needs. The Bureau will continue to enhance its virtual recruiting capabilities into FY 2021.

Outreach Events: During FY 2020, the Bureau continued its engagement in outreach events despite the COVID-19 pandemic. The reality of federal agencies and professional organizations shifting from in-person to virtual events provided the opportunity for the Bureau to reach a wide virtual audience. In September 2020, the Bureau virtually participated in the *Ascend National Convention and Career Fair*, the largest gathering of Pan-Asian business leaders and professionals in North America, and in October 2020, the Bureau participated in the *Prospanica National Conference and Career Expo*, an association of Hispanic business professionals. At both events, OMWI collaborated with the Office of Human Capital, Employee Resource Groups, and other Bureau divisions to ensure diverse representation. The Office of Human Capital has developed a FY 2021 recruitment strategic plan to ensure the Bureau's virtual engagement in these events continues.

Disability Recruitment: The Bureau focused on creating opportunities for recruiting persons with disabilities by working with organizations to establish contact, recruiting for specific job opportunities, and working with staffing consultants to include outreach to networks such as: Disabled Person, Project Hired, Easter Seals' organizations, Becoming Independent, and the Workforce Recruitment Program. In addition, the Bureau continued to support the use of non-competitive hiring authorities, such as the Schedule A disability hiring authority, to ensure the Bureau's hiring actions are inclusive of individuals with disabilities.

Affirmative Action Plan for the Recruitment, Hiring, and Retention of Persons with Disabilities (AAP): The Bureau continued to utilize model employer recommendations and guidance outlined by the Equal Employment Opportunity Commission to promote the recruitment of individuals with disabilities, such as government-wide disability programs like the Workforce Recruitment Program, Office of Personnel Management's Bender List, and other disability-focused candidate databases as resources for a talent pipeline for individuals with disabilities.

Student Recruitment: The Bureau was able to leverage and promote flagship professional programs, such as the Director's Financial Analyst Program, the Honors Attorney Program, and the Pathways Intern Program, and to find and hire thirteen (13) new entry-level employees.

The Bureau also used the Federal Pathways Program to build a robust pipeline of talent to meet the Bureau's workforce needs. In addition, the Bureau partnered with the Office of the Comptroller of the Currency to sponsor and host 10 D.C. area high school students through the *High School Scholars Internship Program*, a six-week program that provided students with salaries, work experience, enrichment activities, and mentoring.

Hiring and Retention

Structured Interview Training

In FY 2020, the Office of Human Capital continued to provide structured interview training for Bureau hiring managers and interviewers to assist in eliminating bias in the interview process. They provided divisions with guidance on how to integrate structured interviews into their hiring process. The Office of Human Capital recommends that all hiring teams use a structured interview process to hire new employees. The goal is to help ensure that Bureau hiring managers make selection decisions based on objective job-related information that minimizes bias and provides a fair and equitable process that increases workforce diversity.

Retention Efforts

In FY 2020, the Bureau continued to focus on retention of our talented diverse workforce by continuing to post internal advancement opportunities, such as details, temporary promotions, vacancies, and reassignments on the Bureau's internal website. Further, the Bureau listed these opportunities on the daily internal announcement feed to reach the entire workforce. In addition, OMWI and the Office of Human Capital worked with the Bureau's Employee Resource Groups and its Diversity and Inclusion Council of Employees to broadly promote opportunities among their networks.

Barrier Analysis

Throughout FY 2020, the Bureau continued its efforts to address barriers impacting the workforce, including minorities. The Barrier Analysis Action Plan Working Group, which included representatives from the Office of Civil Rights, the Office of Human Capital, the Disability and Accessibility Program, and OMWI, worked collaboratively to review the barrier analysis and develop action items. The group reviewed the Bureau's workforce demographics, Annual Employee Survey data, and EEO complaint trends, and provided recommendations to the Workforce Effectiveness Committee and the Director. Recommended action items were condensed into four areas: Workforce Communications Initiatives, Management Actions, Diversity & Inclusion Plans and Projects, and Selection-Process Enhancements. The Working Group prioritized possible actions based on the impact on barriers, employee visibility, and the availability of resources, and engaged the Divisions by assigning office "owners" to each recommendation.

Implementation of action items began in FY 2020 and will continue in FY 2021. An example of the actions being implemented includes a mentoring program for mid and lower-level staff to aid them in career planning and development.

Leadership and Professional Development

Succession Planning

The Bureau fully established a new Workforce Planning function in FY 2019 and since then has completed initial leadership and workforce analysis and gained approval for our inaugural succession planning process. Throughout FY 2020, the Bureau conducted additional analysis and both leadership and workforce reviews. Recommendations stemming from those reviews and additional follow-on actions will be assessed in 2021.

Leadership Development

The Office of Human Capital provided three broad categories of leadership development in FY 2020: The Leadership Excellence Seminars training series, the Supervisory Development Seminars programs, and individual executive coaching.

The leadership development training programs are mandatory for all supervisors, managers, and senior leaders, and the executive coaching offering is optional (available to executives and managers of managers). OMWI worked with the Office of Human Capital in the development of these training programs to ensure that diversity and inclusion was infused in the content. At the end of FY 2020, the average completion rate of all Leadership Excellence Seminars training sessions was 80%. These sessions will continue in FY 2021 for newly appointed managers.

The Supervisory Development Seminar is a three-day, mandatory training for all newly appointed Bureau supervisors. It covers content on leading people, making the transition to supervisor, human resources technical knowledge, performance management, and addressing performance problems and conduct issues. It also incorporates a module, presented by OMWI and the Office of Civil Rights, on understanding and mitigating unconscious bias in the performance evaluation process and includes sample case studies, tips for managers to identify their own potential biases, and tools for further learning. To date, 89% of all managers onboarded as of December 2020, had completed the training. This training program will continue in FY 2021 for newly appointed Bureau managers.

Mentoring for Success Program

OMWI collaborated with the Office of Human Capital to launch the *Mentoring for Success Program* in January 2020. OMWI launched the program during January in recognition of National Mentor Month.

The *Mentoring for Success Program* consists of three components: The mentor and protégé pairs, a leadership speaker series, and small group discussions.

For the Mentor/Protégé pairs, the program was open to all Bureau employees. OMWI encouraged Bureau staff to sign-up for the matching through an online application process. Employees could apply as mentors or protégés and once accepted, were paired together based on specific criteria and expressed interests.

Mentors and proteges attended an orientation workshop to ensure they had the tools needed to have successful mentoring relationships and had periodic check-ins and feedback sessions with the OMWI team. In FY 2020, the Bureau successfully matched 35 mentor/protégé pairs.

In addition to the mentor/protégé pairs, all Bureau employees could also participate in the program's career discussion sessions and Leadership Speaker series. These sessions were offered in tandem on a monthly basis.

In FY 2020, the career discussions consisted of discussions on topics relevant to career development and advancement including:

- Mapping your career;
- Personal networking;
- Building a professional portfolio and how to present qualifications to potential employers;
- Tips for successful structured interviews; and,
- How to write a resumé.

The program's Leadership Speaker Series featured high-ranking Bureau leaders discussing topics such as personal values, leadership qualities, and life lessons. The sessions were well received by employees and had high attendance. Leaders spoke on the following topics:

- The Heart of Leadership
- Workplace/Work Life Balance
- Mentoring Lessons Learned
- Living Your Values
- Resilience

Workforce Inclusion

The Bureau prioritizes workforce inclusion and fostering an environment where all employees feel valued and empowered to share their views and ideas to best inform the Bureau's work.

To support workforce inclusion in FY 2020, the Bureau provided a broad array of programs and initiatives while seamlessly moving to a mostly virtual environment in accommodation of the COVID-19 pandemic. OMWI continued to work with Bureau Divisions on diversity and inclusion strategic plans to integrate diversity and inclusion into the divisions' business processes. OMWI also continued to provide Divisions with diversity and inclusion training through an OMWI-managed contract that provides training tailored to meet the Divisions' changing diversity and inclusion objectives and needs. OMWI responded quickly and comprehensively to the death of George Floyd, and the resulting social movement, by implementing a racial equity-focused learning plan for Bureau employees.

To promote workforce inclusion, OMWI collaborates closely with the Bureau's Employee Resource Groups and the Diversity and Inclusion Council of Employees, creates and hosts heritage and commemorative events, and monitors the impact of these efforts through the Annual Employee Survey. These programs and initiatives are an integral component of building workforce inclusion and attest to the Bureau's ongoing commitment to maintain a sustainable, high-performing, diverse, inclusive, and engaged workforce.

Moving forward, the Bureau will continue to work to provide all Bureau employees with the opportunity to reach their full potential and ensure its programs do not perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups.

Management Engagement

The OMWI leads the Bureau-wide implementation of the Bureau's current Diversity and Inclusion Strategic Plan. In leading the implementation of the Bureau's diversity and inclusion mandates, OMWI ensures sustainability by developing strategies and processes to promote an inclusive culture and equip Bureau leaders with the skills necessary to effectively manage all aspects of diversity and inclusion in their divisions. The Bureau's Workforce Inclusion focus is to "cultivate a culture that encourages collaboration, flexibility and fairness to enable individuals to contribute to their full potential." To do so, the Bureau emphasizes the need for planning and implementing diversity and inclusion initiatives as a routine effort in all areas of the Bureau's operations.

In FY 2020, OMWI guided the Bureau's divisions in developing and implementing more robust diversity and inclusion division-level strategic plans that can assist them with integrating diversity and inclusion goals and initiatives into their business operations.

For example, each division leader assigned a mid- to senior-level point of contact to lead the development and implementation of its diversity and inclusion initiatives which were linked to its performance plan. OMWI, the Office of Civil Rights, and the Office of Human Capital worked closely with the points of contact to review relevant data, identify areas of focus, and develop and implement initiatives.

Beginning in FY 2020, the Office of Equal Opportunity and Fairness Leadership began conducting briefings – 360 Meetings - with the leadership of each division to review comprehensive demographic and work environment data and recommend diversity and inclusion strategic actions in keeping with the Bureau's overall diversity and inclusion needs and goals. This management engagement served to further build accountability for diversity and inclusion at the leadership level of each division. The result of OMWI's additional efforts created a cascading effect such that each division has a diversity and inclusion plan as part of its overall performance plan, which is also linked to the Bureau-wide Diversity and Inclusion Strategic Plan.

The OMWI team met with division persons of contact on an ongoing basis to provide monitoring and support, in addition to providing access to diversity training and resources. The following is a sampling of diversity and inclusion initiatives that divisions and offices developed and implemented in FY 2020:

- Continuing to provide diversity and inclusion training to employees to increase awareness, understanding, and skills for interacting effectively in the Bureau's diverse workplace, and for working with consumers;
- Working to increase diversity in recruitment and hiring by including a larger number of diverse professional organizations and universities in their recruitment process and using structured interviews and diverse panels in hiring;
- Making changes to the recruitment processes for the Bureau's Honors Attorney Program to ensure access to a more diverse pool of potential candidates;
- Creating opportunities for leaders to have discussions on diversity in the workplace to address the racial equity issues that developed in FY 2020 (OMWI conducted race equity discussions for five offices and secured consultants for other offices);
- Including a review of diversity and inclusion initiatives in each division's performance plan reviews; and,

- Divisions and offices considering how to add a supplier diversity initiative to their diversity and inclusion plans.

Training

Diversity and Inclusion Training for Supervisory and Non-supervisory Staff

To ensure the Bureau achieves the maximum benefit from its increasingly diverse workforce, OMWI provides diversity and inclusion training for supervisory and non-supervisory staff. This includes mandatory diversity and inclusion training for all staff and training provided to divisions as part of their diversity and inclusion strategic planning efforts. The Bureau has conducted an ongoing mandatory training initiative for the past several years to provide foundational diversity and inclusion training to managers and non-supervisory employees. The Bureau closed out this program in early FY 2020. We conducted a mandatory training for staff in October of 2019 (FY 2020) to close out the program. Ten of the 17 scheduled attendees participated.

OMWI's main training focus in FY 2020 was launching the next phase of our mandatory diversity and inclusion training program for supervisors and non-supervisory staff. Managers and non-supervisory staff have previously received training to increase their awareness and understanding of diversity and inclusion and the next phase of training will focus on skill building, and applications to implement in the workplace.

OMWI conducted a solicitation to select a vendor to develop and deliver the training. The Bureau searched for a new vendor to provide a training program that supports managers and non-supervisory employees in developing and enhancing competencies that help to foster a diverse and inclusive workplace so that employees can have the skills needed to create relevant solutions for consumers from all backgrounds.

In FY 2021, OMWI will focus its goals on advancing inclusion and equity through training so that every employee has the opportunity to reach their full potential. Our goal is to:

- Meet the Section 342 of the Dodd-Frank Act requirement that OMWI set standards for equal employment opportunities and ensure the racial, ethnic, and gender diversity of the workforce and senior management of the agency.

- Facilitate the Bureau performance process that requires that managers and staff be evaluated on diversity and inclusion competency goals as part of the annual performance evaluation.
- Foster the OMWI goal to support managers and non-supervisory employees in developing and enhancing competencies that help to foster a diverse and inclusive workplace and empowers employees with the skills needed to create relevant solutions for consumers from all backgrounds.

In addition to the mandatory training for all Bureau employees, the new contract also supports the training OMWI provides through our strategic planning collaboration with each division, in which divisions develop and implement their diversity and inclusion plans, including training. In FY 2020, several divisions provided multiple workshops on the following topics:

- What's your micro-trigger?
- Unconscious Bias
- Generations Working Together

Once the contract was awarded, OMWI began working with the vendor to develop the new customized mandatory diversity and inclusion training program. The new contract includes both mandatory training that is offered through the OMWI for all managers and staff, and training offered to divisions and employee resource groups. We are currently working with the vendor on customization so we can begin offering these workshops in early 2021.

In FY 2020, the Bureau also made changes to the process to better deliver diversity and inclusion trainings. OMWI is collaborating with the Office of Human Capital set up a process to use the Bureau's current Talent Management Learning System, that is familiar to employees, to track and manage diversity related trainings. The centralized system will provide employees with an accessible tool, make registration easier, and track completion of training for Bureau record-keeping.

Executive Orders 13950 and 13985

The ongoing calendar of diversity and inclusion training at the Bureau was paused in October 2020, as a direct result of President Trump's September 22, 2020, Executive Order (E.O.) 13950 on [Combating Race and Sex Stereotyping](#), which stated that agencies should immediately begin implementing the requirements of the E.O. The Bureau received a September 28, 2020, memorandum from Director Russell T. Vought, Office of Management and Budget (OMB), titled *Ending Employee Trainings that Use Divisive Propaganda to Undermine the Principle of Fair and Equal Treatment for All* (M-20-37). That was a follow-up memo from the September 4,

2020, memorandum, also from Director Vought, titled *Training in the Federal Government* (M-20-34).

The memorandum required that agencies and their contractors not engage in divisive training of their employees, report to OMB on FY 2020 diversity and inclusion training spending, designate a political appointee to approve expenditures on diversity and inclusion training, report to OMB on trainings that include “divisive concepts,” and submit for review all future training programs relating to diversity and inclusion to the Office of Personnel Management prior to their implementation.

The Bureau submitted the required materials in mid-October to the Office of Personnel Management. We received the response on December 1, 2020, that most of our training content was compliant with the E.O. President Biden’s January 20, 2021, E.O. 13985, *On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, revoked E.O. 13950. OMWI has informed all Bureau management that any diversity and inclusion training and related activities that had been previously affected can fully resume. OMWI is moving forward with its diversity and inclusion training activities that were previously affected by E.O. 13950.

Employee Engagement

OMWI uses a variety of methods to engage and educate staff on diversity and inclusion. These include employee groups, cultural and educational events and activities, and communication and messaging.

Employee Resource Groups

OWMI engages staff through two types of employee groups—Employee Resource Groups and the Diversity and Inclusion Council of Employees. Both groups serve as valuable resources for raising cultural awareness, providing staff with a way to come together around common interests and issues, and advancing diversity and inclusion at the Bureau.

Employee Resource Groups are Bureau-recognized networks of Bureau employees with similar interests, backgrounds, or experiences designed to provide their members with a supportive environment encouraging networking and collaborating on career management, personal and professional development, and community involvement. Employee Resource Groups are created and run by employees. The Groups advance inclusion of employees and contribute in

ways that help the Bureau hire, retain, and develop our diverse workforce.²² Throughout FY 2020, the Bureau had six active Employee Resource Groups: ADELANTE, ASPIRE, PARENTS, PRIDE, RISE, and SPARK. In FY 2020, the Bureau began a modification of its Employee Resource Group policy to integrate the Groups more fully into the Bureau structure and to allow their volunteers use of official time. Please see Appendix B for a detailed description of each Bureau Employee Resource Group and Appendix C for a complete listing of employee engagement events.

Diversity and Inclusion Council of Employees

The Diversity and Inclusion Council of Employees is comprised of employees from across the Bureau's headquarters and the regions. The volunteer members represent many job series and pay band levels. The Council provides diversity and inclusion-related recommendations to OMWI, offers their feedback on Bureau initiatives, and works on projects and programs that support OMWI's goals.

The Council partners with OMWI to promote a diverse, inclusive, and engaged workforce and is collaborating with OMWI and the Office of Human Capital on several initiatives such as: (1) *The Bureau Serves High Schools* program in which Bureau staff volunteer to teach financial literacy concepts in Title One high schools. The program is currently in a pilot phase. The first virtual school visit to deliver personal financial education is scheduled for February 2021. The Bureau Serves program will help fulfill requirements under Sec. 342 (f)(5) of the Dodd-Frank Act; (2) *The Recruitment Ambassador* Program will create a trained group of diverse Bureau employees to attend all recruiting events in support of the Bureau's efforts to attract a diverse workforce. Ambassadors will also serve as liaisons with minority professional business associations and schools; maintaining communication and alerting members to Bureau recruiting events; and, (3) *I am the Bureau* Program is a visual communications campaign that celebrates the diversity already present at the Bureau. Employees of varying identities share their personal perspectives about what makes them unique and how they feel about diversity and inclusion issues.

Protecting Persons with Disabilities

The Bureau provides a dedicated budget and resources to the Disability and Accessibility Program's Reasonable Accommodations Program, 508 Program, and other accessibility program work. The dedicated budget and resources allow the bureau to efficiently and effectively support the accommodation needs of employees and applicants with disabilities, and

²² Employee Resource Group Policy and Operational Procedure DO-OMWI-01-2016.
https://team.cfpb.local/wiki/images/9/90/ERG_Policy_and_Operational_Procedure.pdf

to ensure that individuals with disabilities have ongoing access to Bureau resources. The Bureau's Disability and Accessibility Program partners with the Office of Civil Rights on continued and ongoing disability barrier analysis efforts with an external vendor to review all disability related programs, services, policies, and procedures to identify if there are any barriers to opportunity for Persons with Disabilities or Persons with Targeted Disabilities.

Heritage Months, Commemorative Observances, and Cultural Events

As part of the Bureau's ongoing efforts to foster an inclusive workplace, the OMWI Office conducts cultural and educational events throughout the year, and often in partnership with the Bureau's Employee Resource Groups, the Diversity and Inclusion Council of Employees, and other Bureau offices. During FY 2020, OMWI hosted twenty (20) heritage and commemorative observances, and diversity and cultural events as part of its education series.

The events are designed to raise cultural awareness, foster an environment of cultural intelligence, provide a space to share personal perspectives, histories, and experiences, and to learn about others. The tragic death of George Floyd in May 2020, and the resulting events across the country created an immediate need for discussion opportunities and learning resources for Bureau employees about racial justice and equity. OMWI responded by creating the *OMWI Learn More/Take Actions Dialogue Series* to supplement our normal schedule of inclusion events. All FY 2020 events are listed in Appendix C.

In FY 2020, OMWI collaborated with the Bureau's design team, Employee Resource Groups, and Bureau divisions to create a collection of diversity and inclusion posters to represent each heritage month the Bureau celebrated. These posters were displayed in the Bureau's two D.C. locations and its regional offices to raise awareness among employees. A sampling of the posters is displayed below.

FIGURE 21: INCLUSION POSTERS DISPLAYED AT THE BUREAU



Communications and Messaging

OMWI communicates regularly with the workforce about diversity and inclusion activities and initiatives at the Bureau, as well as issues and activities in the public landscape. The OMWI Director sends a monthly message to all Bureau employees that features heritage months and commemorations related to diversity and inclusion. To acknowledge and honor commemorations, OMWI posts regular content on the Bureau's intranet that includes resources for further learning. For example, in the past year the Bureau featured tributes to Justice Ruth Bader Ginsberg and Congressman John Lewis. OMWI publishes diversity and inclusion upcoming events and learning opportunities in the Bureau's Weekly Digest and Manager Minute.

Racial Equity Initiatives

In FY 2020, OMWI developed and implemented a forward-leaning action plan shortly after the tragic death of George Floyd on May 25, 2020, to provide staff and management with tools and resources to assist them in dealing with the events that followed Mr. Floyd's death. The OMWI Director collaborated with peers to plan and deliver a federal multi-financial agencies OMWI webcast titled *Beyond Words: Race, Work, and Allyship Amid the George Floyd Tragedy* on June 24, 2020. As a follow up, the Bureau invited National Credit Union Administration Chairman Rodney Hood to speak to all Bureau employees in a virtual discussion on racial equity issues on July 10, 2020. OMWI created and provided racial equity learning resources to all Bureau employees that addressed specific racial issues such as bias, privilege, and allyship, as well as management-focused guidance and resources for addressing racial issues in the workplace. In addition, the Bureau launched the OMWI dialogue series referenced earlier and centered around a variety of racial equity themes and topics open to all employees, and posted weekly learning resources on our intranet, available to all employees. The nation is focused on racial inequity in all aspects of American society. The current landscape creates an urgency and increased importance to the racial equity initiatives of the Bureau. OMWI recognizes this need for urgency and will continue to make every effort to implement initiatives that are responsive to these issues.

Annual Employee Survey

The Bureau tracks progress on its diversity and inclusion strategy by using specific data sources. Information from these sources informs how diversity and inclusion issues are identified and addressed in the Divisions' annual diversity and inclusion strategic plans. The data sources used are: The Annual Employee Survey (AES) including the Inclusion Quotient and employee comments; internal periodic surveys like the survey of exiting employees, and the Best Places to Work rankings by the Partnership for Public Service.

The AES fulfills the requirement of Subpart C, 5 CFR, Part 250, to assess leadership and management practices and employee satisfaction. The Bureau tracks employees' perceptions of the workplace culture and environment and their opinions on inclusiveness. In 2020, a total of 939 (64.6%) Bureau employees completed the AES – similar to 65.2% in 2019. The AES feedback showed positive perceptions of the work experience and supervisors.

The AES measures inclusion by analyzing employees' perception of the extent to which they experience the Bureau as inclusive, using annual targets and tracking results from year to year. The Inclusion Quotient, a subset of 20 survey items, focuses on employees' perception of, and

experience in the workplace. The Inclusion Quotient consists of five aspects of inclusion: Fair, Open, Cooperative, Supportive, and Empowering²³. These five areas are defined as follows:

- **Fair:** perception of fairness in performance evaluation, rules and procedures.
- **Open:** extent to which the agency and/or managers promoted diversity and inclusion.
- **Cooperative:** extent to which managers promote communication and support collaboration.
- **Supportive:** management and leadership style of managers.
- **Empowering:** employees’ participation in decision-making.

Table 5 compares the results on the Inclusion Quotient Index to the Bureau’s 2019 results. The Bureau established a 2020 target for the Inclusion Quotient of “67.0% favorable” as part of the Bureau’s strategic planning. The 2020 AES Inclusion Quotient Index result of 67.0% shows we met this target.

The results for the Fair sub-index, which includes items that deal with fairness in performance evaluation, rules, and procedures, show the lowest sub-index level results, but are the same as the 2019 ratings. The ratings in all the other sub-indices, except one, increased slightly from 2019. The rating for the Open subindex, which measures whether diversity and inclusion is promoted by the agency or managers, decreased by 1.3%. The Inclusion Quotient, as well as all sub-indices, exhibited changes of less than 5% compared to 2019.

TABLE 5: THE BUREAU INCLUSION QUOTIENT

Inclusion Quotient Index	CFPB 2020	CFPB 2019
Inclusion Quotient: Combines all five subindices	67.0%	66.6%
Fair: Items deal with fairness in performance evaluation, rules, and procedures	50.1%	50.1%
Open: Items deal with whether diversity and inclusion are promoted by the agency and/or managers	69.4%	70.7%
Cooperative: Items deal with whether managers promote communication and support collaboration	65.8%	64.8%

²³ OPM FEVS Governmentwide Report, 2019.

Inclusion Quotient Index	CFPB 2020	CFPB 2019
Supportive: Items deal with management and leadership style	87.0%	85.8%
Empowering: Items deal with participation in decision-making	62.7%	61.5%

These Inclusion Quotient data continues to be an important component of how the Bureau tracks the employee experience and informs strategies and programming to help strengthen inclusion of all employees.

Bureau Rankings

The Bureau's efforts to develop and foster a diverse and inclusive workforce and culture have been recognized by outside organizations and third-party surveys. The Partnership for Public Service publishes the results of its Best Places to Work in the Federal Government Survey²⁴ each year. For the past six years (2014-2019), the Bureau has ranked in the highest quartile in the "Support for Diversity" category that measures the extent to which employees believe that actions and policies of leadership and management promote and respect diversity.

In 2020, the Bureau ranked 14th on the annual Careers & the disABLED Magazine's Top 20 Government Employers and highest among the federal financial institutions identified. The Bureau's ranking increased to 14 from 15 the previous year. Careers & the disABLED is the nation's first and only career-guidance and recruitment magazine for people with disabilities who are at undergraduate, graduate, or professional levels. Readers voted for the government agencies they thought best represented their interests:

²⁴ Results of the 2020 Survey are expected soon.

disABLED Top 20 Government Employers 2020



1. Central Intelligence Agency (CIA)
2. National Security Agency (NSA)
3. U.S. Department of State (DOS)
4. Transportation Security Administration (TSA)
5. Air Force Civilian Service (AFCS)
6. National Geospatial-Intelligence Agency (NGA)
7. Naval Air Systems Command (NAVAIR)
8. U.S. Nuclear Regulatory Commission (NRC)
9. Los Alamos National Laboratory (LANL)
10. Social Security Administration (SSA)
11. Internal Revenue Service (IRS)
12. Sandia National Laboratories
13. National Aeronautics and Space Administration (NASA)
- 14. Consumer Financial Protection Bureau (CFPB)**
15. United States Postal Service (USPS)
16. Naval Sea Systems Command (NAVSEA)
17. Federal Bureau of Investigation (FBI)
18. Federal Deposit Insurance Corporation (FDIC)
19. Lawrence Livermore National Laboratory (LLNL)
20. Bureau of Land Management (BLM)

Supplier Diversity

Minority- and Women-owned Business Inclusion

As required by the Dodd-Frank Act, Section 342 (c)(2), the Bureau continues to implement standards and procedures to ensure the fair inclusion and use of minorities, women, and Minority- and Women-owned Businesses (MWOBs) in all business activities at the Bureau. The Bureau continues to look for, and act on, potential barriers that prevent MWOBs from taking advantage of agency procurement and contracting opportunities. OMWI continually evaluates what policies or guidance documents may assist MWOBs in doing business with the Bureau.

In FY 2020 the Bureau utilized both internal and external strategies to continue to successfully advance our engagement with MWOBs and steadily increase MWOB inclusion and spend.

Internally, OMWI supports MWOB inclusion as follows:

- As part of the diversity and inclusion strategic planning process, OMWI provided MWOB briefings to the Bureau divisions highlighting the business case for supplier diversity, sharing office specific MWOB statistics, and inclusion best practices. There were a limited number of sessions completed in FY 2020 due to the COVID-19 pandemic.
- OMWI helped Bureau offices source prospective MWOB vendors by conducting market research and promoted MWOBs to program offices through the Bureau's Enhanced Acquisition Management System and capabilities-matching research.

Externally, OMWI worked with the Procurement Office to enhance outreach opportunities to engage with MWOBs. The Procurement Office has also designated a business inclusion specialist to work in conjunction with OMWI to ensure alignment of OMWI goals with procurement sourcing strategies to maximize opportunities wherever possible. The collective goal is to provide the maximum consideration possible to the fair inclusion and use of MWOBs in all Bureau business and activities by:

- Publicizing forecasts of upcoming Bureau contract opportunities on our website;
- Hosting two virtual technical assistance outreach events on *How to do Business with the Bureau*, aimed at providing interested vendors awareness of the Bureau's supplier

diversity efforts, procurement processes, updated requirements forecast, and best practices technical assistance; and,

- Conducting external outreach in conjunction with the Office of Procurement at national federal contracting events, including the National Minority Development Council (NMSDC) Conference, the 8(a) Conference, and the Annual Government Procurement Conference.

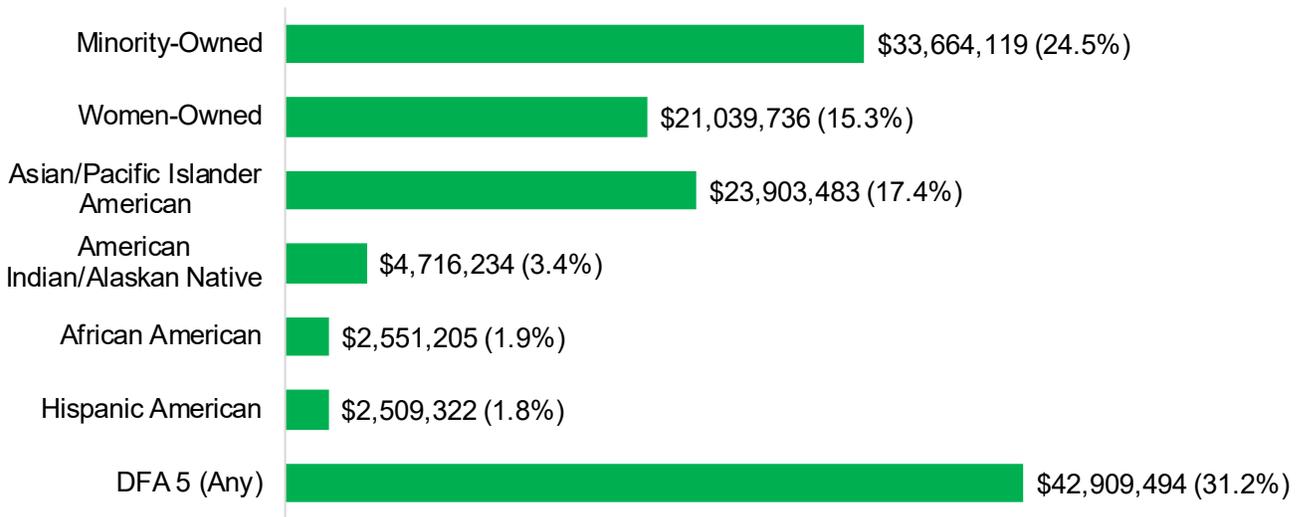
Our efforts have resulted in positive trends over the years - with our spend with MWOBs going from 9.2% in 2017, to 17.2% in 2018, to 28.9% in 2019²⁵. In FY 2020, the Bureau spent \$137.5 million, of which \$42.9 million (31.2%) was spent with MWOBs. This is a notable increase from the Bureau's spend of \$35.5 million (28.9%) with MWOBs in FY 2019. As shown in the table below, procurement dollars spent by the Bureau increased in every MWOB category:

TABLE 6: DOLLARS SPENT TOWARD MINORITY-OWNED AND WOMEN-OWNED BUSINESSES

Business	FY 2019		FY 2020		Change
Minority (Any)	\$26,579,566	21.7%	\$33,664,119	24.5%	+2.8%
Women Owned	\$16,967,515	13.8%	\$21,039,736	15.3%	+1.5%
Asian/Pacific Islander American	\$19,431,419	15.9%	\$23,903,483	17.4%	+1.5%
American Indian/Alaskan Native	\$3,685,640	3.0%	\$4,716,234	3.4%	+0.4%
African American	\$1,955,696	1.6%	\$2,551,205	1.9%	+0.3%
Hispanic American	\$1,506,811	1.2%	\$2,509,322	1.8%	+0.6%
Total MWOBs	\$35,470,619	28.9%	\$42,909,494	31.2%	+2.3%

²⁵ In 2018, the OMWI Annual Report to Congress shifted from covering the calendar year to covering the fiscal year.

FIGURE 22: FY 2020 DOLLARS SPENT WITH MINORITY- AND WOMEN-OWNED BUSINESSES



In FY 2020, the Bureau obligated 27% of all contract award dollars to MWOBs. The dollars spent on MWOBs reflect the contract’s terms and conditions, including the amount obligated, periods of performance, and options. The top categories where those funds were obligated include computer-related services, computer programming, and facilities support services.

FIGURE 23: FY 2020 DOLLARS OBLIGATED TO MINORITY- AND WOMEN-OWNED BUSINESSES

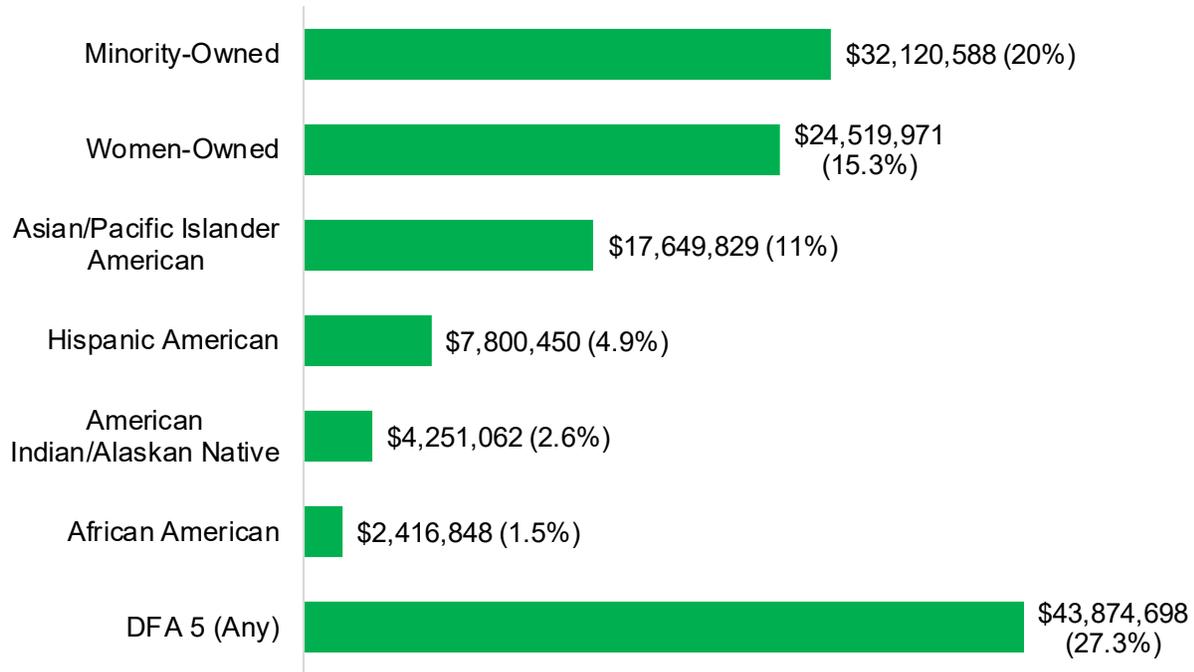


TABLE 7: TOP TEN NAICS MINORITY- AND WOMEN-OWNED BUSINESS OBLIGATIONS

NAICS Code	NAICS Description	Obligated
541519	OTHER COMPUTER RELATED SERVICES	\$12,550,555
541611	ADMINISTRATIVE MANAGEMENT AND GENERAL MANAGEMENT CONSULTING SERVICES	\$6,719,941
541511	CUSTOM COMPUTER PROGRAMMING SERVICES	\$5,913,409
541512	COMPUTER SYSTEMS DESIGN SERVICES	\$4,640,221
236220	COMMERCIAL AND INSTITUTIONAL BUILDING CONSTRUCTION	\$4,539,823
561210	FACILITIES SUPPORT SERVICES	\$3,738,804
561612	SECURITY GUARDS AND PATROL SERVICES	\$2,259,682

NAICS Code	NAICS Description	Obligated
611710	EDUCATIONAL SUPPORT SERVICES	\$857,377
561320	TEMPORARY HELP SERVICES	\$634,334
315999	OTHER APPAREL ACCESSORIES AND OTHER APPAREL MANUFACTURING	\$508,971

Good Faith Effort Compliance

Section 342 (c) of the Dodd-Frank Act, requires the OMWI Director to develop standards and procedures to determine whether an agency contractor and, as applicable, a subcontractor has failed to make a good faith effort to include minorities and women in their workforce. To fulfill this requirement, the Bureau continues to include a Good Faith Effort (GFE) contract clause in all Bureau contracts to ensure contractors and subcontractors are aware of their statutory obligation to make a good faith effort to include women and minorities in their workforce.

In fiscal year 2020, the Bureau collected GFE compliance data from a sample of contractors and used the insights gained from the analysis of that data to modify the Bureau’s GFE compliance process. The OMWI reviewed and updated the GFE contract clause and its related procedures, developed criteria to measure and assess contractors’ GFE efforts, and created a new standard operating procedure to document the GFE assessment process. As a result of this process, OMWI has increased communication with contractors to maximize technical assistance throughout the process. OMWI has modified its GFE compliance process to engage in communication and education before considering any of the penalties allowed under the statute for failure to make a Good Faith Effort. The Bureau also updated documentation requirements so that contractors can now submit documentation demonstrating their efforts to address the six Good Faith Effort evaluation criteria the Bureau is using: 1) Diversity Strategy; 2) Diversity Policies; 3) Recruitment; 4) Succession Planning; 5) Outreach; and 6) Supplier – Subcontractor Diversity.

TABLE 8: HOW THE BUREAU COMMUNICATES WITH CONTRACTORS ABOUT GOOD FAITH EFFORTS

Method of Communication	Definition of Communication
Contract clause	A Good Faith Effort contract clause is incorporated into all Bureau contracts; and describes requirements and instructions on how to submit data.
Contract signing	Upon contract award, contractors certify their commitment to equal opportunity in employment and contracting.
Bureau Diversity Profile Form	The Bureau form allows contractors to answer questions addressing the six Good Faith Effort evaluation criteria.
Website communications	Frequently Asked Questions, data submission instructions, and Best Practices documents provide contractors on-demand compliance assistance
Contractor onboarding	During the onboarding process, the Office of Procurement can compel contractor compliance with the Good Faith Effort requirement by addressing the Good Faith Effort contract deliverable at the time of award.
Contracting Officer Representative reports	Each Bureau program office can compel contractor compliance though quarterly performance reports.
Technical assistance roundtables	The Bureau holds quarterly small group instructional sessions with Good Faith Effort contractors.

Together, the updates to the GFE clause, and technical assistance such as quarterly roundtable guidance sessions, frequently asked questions, and best practices documents will provide contractors with the tools to remain in compliance and promote positive internal and external stakeholder engagement. As part of this process, OMWI collaborated with the federal financial institutions’ regulatory agencies’ interagency GFE working group that examines best practices to increase stakeholder communication and inclusion in all areas of business activities.

The Bureau is continuing to refine contractor technical assistance to improve the submission, quality and efficiency of their GFE submissions. In order to minimize the limitations of real-time data processing, the Bureau is evaluating development of an automated GFE process.

Inclusion in Business Activities

Education, Engagement, and Partnerships

Educating Youth

High School Scholars Internship Program (HSSIP)

In July 2020, the Bureau joined the Office of the Comptroller of the Currency and the NCUA to participate in the 2020 *High School Scholars Internship Program (HSSIP)* in partnership with the District of Columbia's Department of Employment Services, Marion S. Barry Summer Youth Employment Program. Through the six-week, paid enrichment opportunity, the Bureau sponsored 10 rising seniors from Eastern and Roosevelt Senior High Schools in the District of Columbia. The program provided the students with an opportunity to build business skills and gain exposure to the financial services arena. The program also helped the Bureau to fulfill its Section 342 mandate to partner with organizations to place talented young minorities and women in industry internships and summer employment. The Bureau will continue to engage with underserved communities and seek out occasions to increase communication and provide opportunities.

The Bureau Serves Program

To further engage with high school students, OMWI and the Diversity and Inclusion Council of Employees are developing *The Bureau Serves* program in which Bureau employees will voluntarily work with Title One high school students and teachers to promote financial literacy and career opportunities in financial services and economics. The Program specifically targets young students in underserved communities that have previously been underrepresented by the government. Starting in 2021, OMWI will recruit volunteer Bureau employees and provide training. This program fulfills the Bureau's Section 342 mandate to partner with inner-city schools, girls' high schools, and high schools with majority minority populations to establish or enhance financial literacy programs and provide mentoring. OMWI continues to explore ways to cross-promote Bureau opportunities to these communities.

Education Outreach and Partnerships

In FY 2020, the Bureau hosted three youth financial education learning clusters. The learning clusters brought together state financial education policymakers and practitioners to share ideas

and best practices, brainstorm solutions to common problems, and develop strategies for advancing K-12 financial education in their respective states.

Response to the COVID-19 Pandemic

On April 10, 2020, the Bureau met with consumer advocates, and civil rights and community groups to discuss consumer finance issues affecting people of color during the COVID-19 pandemic. On April 16, 2020, the Bureau held a call with a dozen civil rights groups to discuss how the pandemic has disproportionately affected minority and immigrant communities. Engagement with these groups presents the Bureau a great opportunity to promote critical resources and tools to these underserved communities.

On July 17, 2020, as part of Consumer Financial Protection Week, the Bureau provided resources about mortgage and housing assistance at a National Diversity Coalition and National Asian American Coalition event, which was attended by over 200 housing counselors, financial educators, faith leaders, nonprofit leaders, small businesses owners, and representatives of local African American, Asian, and Hispanic chambers of commerce. On July 29, 2020, the Bureau hosted a joint consumer and industry roundtable to discuss enhancing financial products and services to Limited-English Proficient consumers.

Unfortunately, the Bureau has received indications that individuals have been taking advantage of the COVID-19 pandemic to scam consumers. To help and educate consumers, the Bureau provided information, resources, and advice on how to avoid being scammed. The Bureau posted consumer resources on its external publicly available website that included types of scams to watch out for such as vaccine and testing scams, “person in need” scams, fake pandemic charity scams, and government imposter scams. The webpage provided practical advice on what to do in each circumstance and offered specific government agencies and organizations to contact for help.

Sharing Financial Resources

To support the Bureau’s mission of educating and empowering consumers to make better informed financial decisions, OMWI collaborated with the Office of Consumer Education to distribute high-quality, free, financial educational resources to educate the public through our outreach and recruitment efforts. In FY 2020, the Bureau engaged with conference attendees and shared financial tools at the *Ascend National Convention and Career Fair*, the largest gathering of Pan-Asian business leaders and professionals in North America, and at the *Prospanica National Conference and Career Expo*, an association of Hispanic business professionals.

In addition, the Bureau partners with other government and private entities to provide financial education and materials to underserved communities. For example, the Bureau's library program continues to provide librarians with free publications, trainings, and opportunities to connect with local financial education providers to help their libraries become a go-to resource on financial topics for their patrons. As part of this effort, the Bureau has worked with the American Library Association, state library associations, state libraries, and local library systems.

Language Accessibility

The Bureau translated educational materials into languages other than English to increase accessibility to non- or limited-English speakers and support multi-language communities during the COVID-19 pandemic, posting content in Spanish, simplified Chinese, traditional Chinese, Korean, Vietnamese, and Tagalog. Our external website currently features: 119 translated blog posts; 10 web pages in our pandemic response hub translated into Spanish; and 37 translated pages on the interagency mortgage and housing assistance center hosted by the Bureau. Also, the Bureau produced 21 videos, six of which are in Spanish, on how to manage financial issues during the pandemic. Additionally, the Bureau hosted a webinar highlighting the multilingual resources available on the Bureau's website, which was accompanied by a blog post linking the webinar and some of the resources discussed. The Bureau worked directly with external stakeholders to distribute these materials to help consumers manage their finances during an uncertain time. We recognize how important it is to provide multi-language materials to ensure diverse communities gain access to this critical information and to resources.

Work with Advisory Boards and Councils

The Consumer Advisory Board is an independent group the Bureau convenes and is made up of a crowdsourced group of experts on consumer protection, consumer financial products or services, community development, fair lending, civil rights, underserved communities, and communities that have been significantly impacted by higher priced mortgage loans. They are charged with identifying and assessing the impact of emerging products, practices, or services on consumers and other market participants. The Bureau strives to ensure membership of the Board reflects balanced points of view, aligns with statutory membership requirements laid out in the Dodd-Frank Act, and diversity is considered. The Bureau's OMWI holds a standing seat on the cross-Bureau Selection Committee, which is tasked with identifying highly qualified candidates for the Bureau's four advisory committees and recommending their appointments to the Director of the Bureau. The Bureau is committed to ensuring that its advisory committee program is diverse and a useful tool for improving the agencies' work to protect consumers in the financial marketplace.

Year after year, the Bureau strives to have a diverse advisory committee program. The OMWI is a regular participant in internal deliberation meetings to identify highly qualified, new advisory committee members and assists with outreach initiatives to ensure the Bureau has a diverse candidate pool of applicants.

Regulated Entities

The Dodd-Frank Act, Section 342 (b)(2)(C), requires the Bureau to develop standards for financial institutions to assess their diversity policies and practices. To support this effort, in 2015, the federal financial regulators' OMWIs created joint standards²⁶ for institutions to conduct their assessments, and a self-assessment form - based on diversity and inclusion best practices - for financial institutions to use to conduct their assessments and provide to their regulators.

In FY 2020, the Bureau focused its industry diversity and inclusion efforts on:

- Conducting extensive outreach to industry about the voluntary diversity and inclusion self-assessment process;
- Sending out requests to financial services entities for self-assessment submissions;
- Conducting research of publicly available diversity and inclusion information on regulated entities' websites and in their annual reports; and,
- Analyzing data from submitted assessments and industry research.

Gaining information on financial institutions is critical to understanding these organizations. Diverse organizations can better serve diverse populations and meet the needs of all their consumers.

Diversity and Inclusion Self-Assessments

The Bureau launched the *Inclusivity* online data collection portal (developed in 2019) in February 2020. The tool enables regulated entities to submit their self-assessments in a user-friendly format. Test users found *Inclusivity* to be easy to understand and navigate. The Bureau expects the portal will benefit financial institutions by reducing paperwork and simplifying reporting. The tool allows the Bureau to analyze data by industry group and identify trends, successes, and areas for opportunity for improvement. To foster continuous ease of use, OMWI

²⁶ Bureau press release, June 9, 2015. [consumerfinance.gov](https://www.consumerfinance.gov)

continues to make improvements to the portal as it receives submissions and develops greater understanding of the data.

Communication has been a crucial aspect of the Bureau's efforts to engage with regulated entities. Because the submission of a self-assessment is voluntary for entities, OMWI has initiated a broad communication strategy to share information about the self-assessment process and use of the data collected to encourage entities' participation.

The Bureau expects the communication campaign will yield greater results over the long term once organizations gain a better understanding of the importance and benefits of utilizing the assessment process and how the Bureau intends to use the data. Notably, the national conversation around race in America has highlighted the need for all organizations to address disparities and to focus efforts on equity.

In FY 2020, OMWI continued its multi-pronged communication strategy and worked with industry trade associations to engage financial institutions. The communication with trade groups focused on outlining the self-assessment process, answering their questions, and sharing information on how the Bureau intended to use the submission data. The Bureau participated in meetings with trade associations and reiterated its commitment to advancing diversity and inclusion within financial services. The Bureau also sent personal acknowledgement letters to the financial services entities that submitted diversity and inclusion self-assessments this year.

The OMWI began sending out monthly data calls in February to encourage entities to submit their assessments. While the OMWI delayed data calls from May through July to allow organizations to adjust to the limitations of the COVID-19 pandemic, the OMWI has contacted over 500 unique entities through subsequent monthly data calls to encourage submission of a diversity self-assessment. The Bureau received twenty-three (23) completed self-assessment submissions as of January 12, 2021, and nineteen (19) assessments are in progress.

Self-assessment submissions ranged widely in terms of size and type of organization. In total, 85% of submitters responded affirmatively to half or more of all assessment questions. Thirty percent (30%) of submitters responded affirmatively to all assessment questions. These entities were larger institutions that may have a better understanding of the business case for diversity and more resources for diversity and inclusion programming.

The largest number of self-assessment submissions were from smaller institutions with 1,000 or fewer employees. A future goal for OMWI is to identify the most important and essential diversity and inclusion programming for smaller and mid-size institutions that will have greater impact on employees and consumers. Going forward we will look to identify trends and share diversity and inclusion best practices gleaned from the data with industry to help advance diversity and inclusion across industries.

TABLE 9: SIZE OF INSTITUTIONS REPORTING SELF-ASSESSMENT DATA—2019 ASSESSMENT PERIOD**

Institution Size (Number of Employees)	Number of Entities	Percentage
0-999	5	39%
1,000-5,000	2	15%
5,000-20,000	3	23%
20,000 +	3	23%

**Entities report data for FY 2019.

The Bureau concentrated initial outreach efforts within the mortgage industry; accordingly, nearly 40% of submissions were from mortgage industry entities. The majority of submissions came from depository lenders. With respect to demographics of submitters, women made up 25% of board members, 26% of executives, and nearly 60% of the workforce. Minorities had a higher board representation when compared to executive positions at 17% and 16%, respectively. Minorities represented nearly 40% of workforce for combined submissions.

TABLE 10: WORKFORCE DEMOGRAPHICS (ALL SUBMISSIONS)— 2019 ASSESSMENT PERIOD

Total	Minorities	% Minorities	Women	% Women
Board Members				
134	23	17.16%	34	25.37%
Executives				
1,238	197	15.91%	324	26.17%
Total Workforce				
392,460	152,077	38.75%	232,699	59.29%

The Bureau analyzed self-assessment submission responses based on the five areas of focus outlined in the [2015 Joint Policy Standards](#):

- Organizational Commitment to Diversity and Inclusion
- Workforce Profile and Employment Practices
- Supplier Diversity

- Practices to Promote Transparency of Organizational Diversity and Inclusion
- Entity Self-Assessment

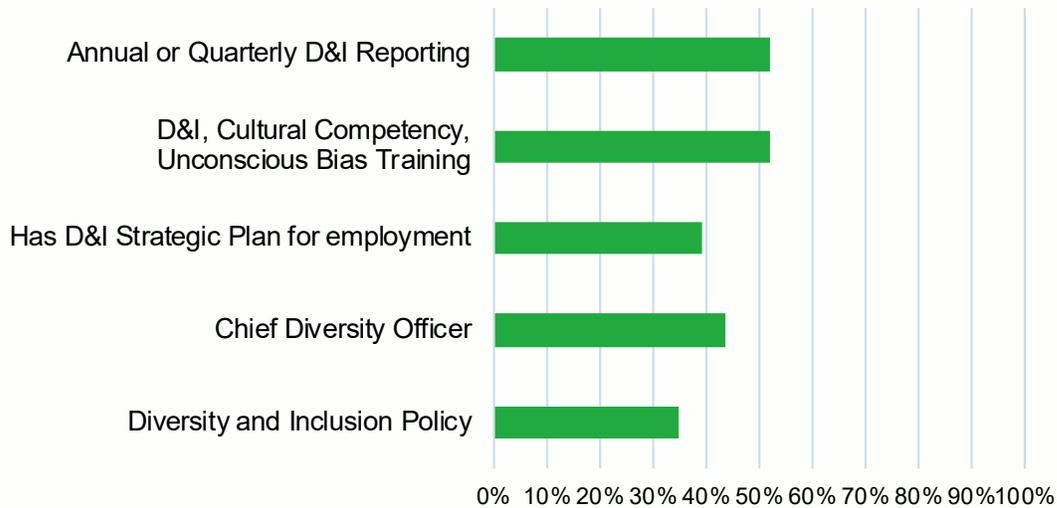
TABLE 11: 2019 DIVERSITY AND INCLUSION SELF-ASSESSMENT CRITERIA

Diversity Self-Assessment Standard	Average Affirmative Response	Average Negative Response
Organizational Commitment to Diversity and Inclusion	84%	16%
Workforce Profile and Employment Practices	73%	27%
Procurement and Business Practices-Supplier Diversity	48%	52%
Practices to Promote Transparency of Organizational Diversity and Inclusion	61%	39%
Entities' Self-Assessment	71%	29%

Organizational Commitment to Diversity and Inclusion

In terms of Organizational Commitment to Diversity and Inclusion, 60% of submitters reported on their diversity and inclusion progress in a quarterly or annual report to leadership. Half of all submissions engaged in some sort of diversity and inclusion training for staff or leadership and had a diversity and inclusion strategic plan. Fewer than half of all submissions had a policy specifically related to diversity and inclusion or a dedicated leader specifically focused on diversity and inclusion.

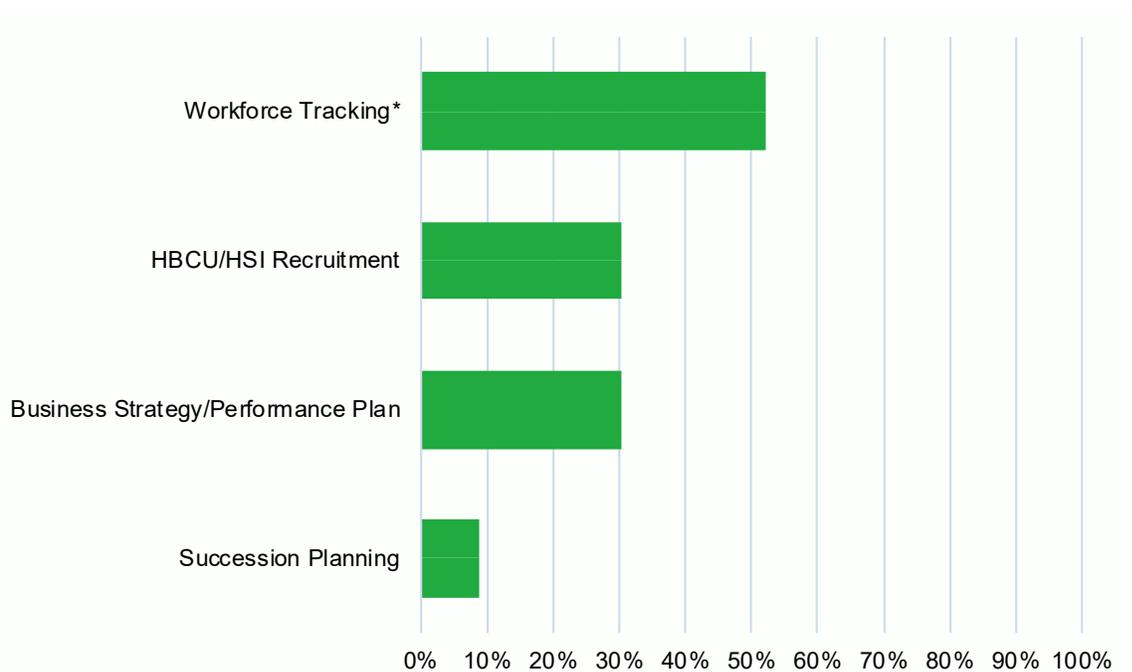
FIGURE 24: ORGANIZATIONAL COMMITMENT TO DIVERISTY AND INCLUSION - 2019 ASSESSMENT PERIOD



Workforce Profile and Employment Practices

Workforce Profile and Employment Practices includes tracking applicant flow, attrition, employee promotions, and other metrics to ensure that the organization is measuring success related to employee engagement and advancement. This standard also examines the recruiting practices of organizations and whether they engage in succession planning. Nearly 50% of all submissions identified a tracking measure related to their workforce. This is promising news since tracking - like assessing - provides valuable information to organizations related to workforce development. Less than 40% of entities reported recruiting at Historically Black Colleges and Universities and Hispanic-Servicing Institutions or reported including diversity and inclusion within their performance plan or business strategy. Less than 20% of entities reported having a succession plan.

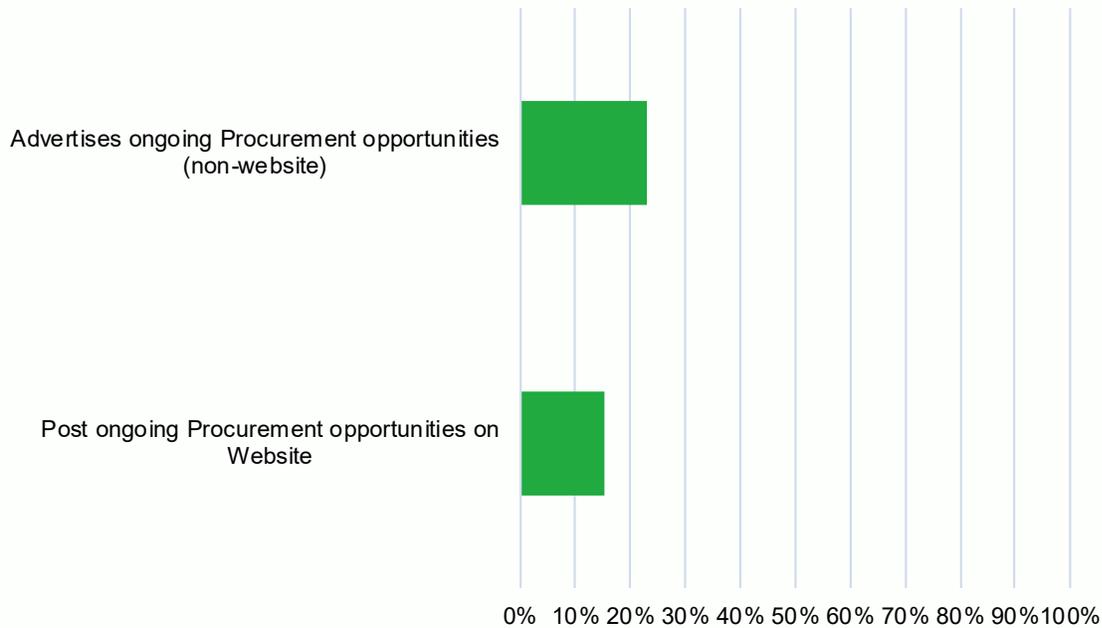
FIGURE 25: WORKFORCE PROFILE AND EMPLOYMENT PRACTICES 2019 ASSESSMENT PERIOD



Supplier Diversity

While most of the depository institutions reported engaging in varying levels of supplier diversity, they did not report sharing information publicly about their forecasted supplier needs or their procurement process. Other entities submitted little to no information on supplier diversity programs of any kind. The data suggests Supplier Diversity is an area with opportunities for greater participation from entities. Modest effort on supplier diversity can yield substantial results and entities can engage in activities that do not require significant resources such as publicizing procurement forecasts.

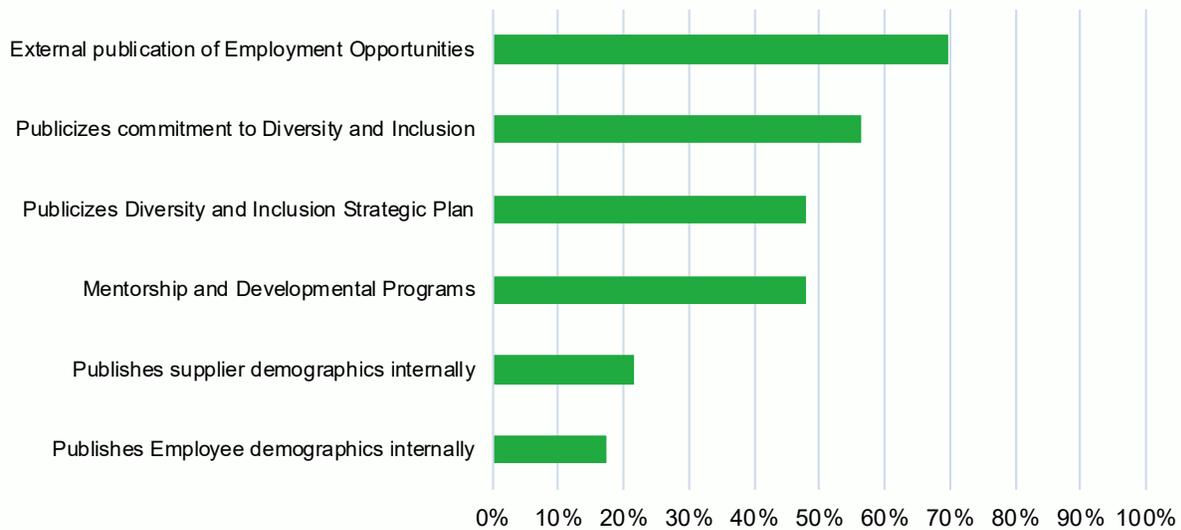
FIGURE 26: ENTITIES SUPPLIER DIVERSITY PARTICIPATION— 2019 ASSESSMENT PERIOD



Transparency of Organizational Diversity and Inclusion

Organizations engaged in numerous Practices to Promote Transparency of Organizational Diversity and Inclusion. Posting new job opportunities and stating a commitment to diversity and inclusion publicly is the most common practice at all the reporting financial institutions. Promoting transparency is an area of success for most reporting institutions, while publishing employee demographics, either externally or internally, is an area of opportunity for improvement for all the reporting institutions.

FIGURE 27: PRACTICES TO PROMOTE TRANSPARENCY— 2019 ASSESSMENT PERIOD

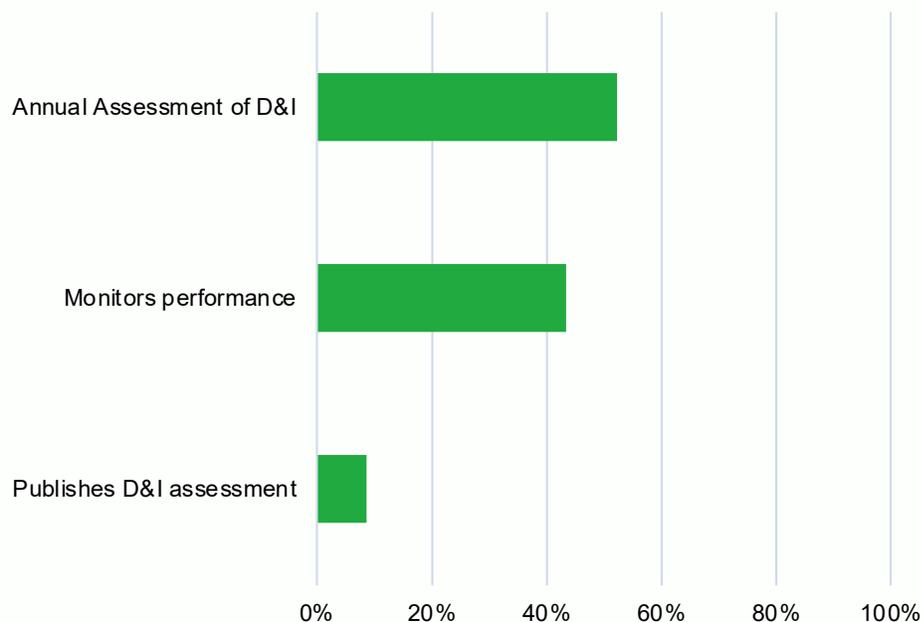


Entity Self-Assessment

More than 60% of submitters reported engaging in some sort of assessment or review process related to diversity and inclusion. Entities' Self-Assessment processes provide important information to organizations. For example, engaging in the Bureau's assessment process and submitting an assessment garners essential information for entities to gain a better understanding of opportunities and challenges as well as how they compare to their peers.

The Bureau is encouraged by the organizations that have engaged in the self-assessment process and submitted their assessments through the *Inclusivity* portal; however, several entities started their self-assessment but have not fully completed the process. The OMWI is working with these organizations to answer questions and provide support throughout the submission process.

FIGURE 28: ENTITY SELF-ASSESSMENT— 2019 ASSESSMENT PERIOD



Bureau Research on Public Facing Industry Diversity and Inclusion Data

The Bureau’s industry research was designed to support the diversity and inclusion self-assessment process by providing additional data on how financial institutions are demonstrating a commitment to diversity and inclusion through public channels. OMWI gained better understanding of industry commitment by assessing publicly available diversity and inclusion information of entities regulated by the Bureau. OMWI will utilize the data collected to provide diversity and inclusion resources, best practices examples, and peer success stories to financial institutions. Given the diversity of the regulatory landscape, this data will also allow the Bureau to set reasonable expectations for the kinds of diversity and inclusion programming that can be expected of large, mid-size, and small institutions.

This industry research process involved collecting data on industry-wide diversity and inclusion efforts using publicly available sources including company websites and annual reports. The 2019 industry sample included 270 entities regulated by the Bureau. The Bureau aggregated the information to identify trends within industry groups in order to determine how well entities were demonstrating their diversity and inclusion efforts.

OMWI analyzed the data based on several factors including the size of the organization and the industry grouping. Most small organizations (under 1,000 employees) do not have robust diversity and inclusion programs. Large organizations have invested in infrastructure and resources dedicated to diversity and inclusion programming. There were obvious outliers within the small, midsize, and large entity groupings with some small institutions showing impressive diversity and inclusion policies and programming, and other large institutions with little to no publicly identified commitment.

To expand on the initial industry research project, the Bureau began reviewing the publicly available diversity and inclusion information from the websites and annual reports of members of specific trade associations. The goal was to share the information with the trade associations and offer opportunities to work together to encourage their members to adopt best diversity and inclusion practices. OMWI was able to provide a portrait of how well trade association members were doing in terms of publicizing their diversity and inclusion programming. The leaders of these trade groups were appreciative of the data shared and the opportunity to partner with the Bureau to advance diversity and inclusion.

Rating Process

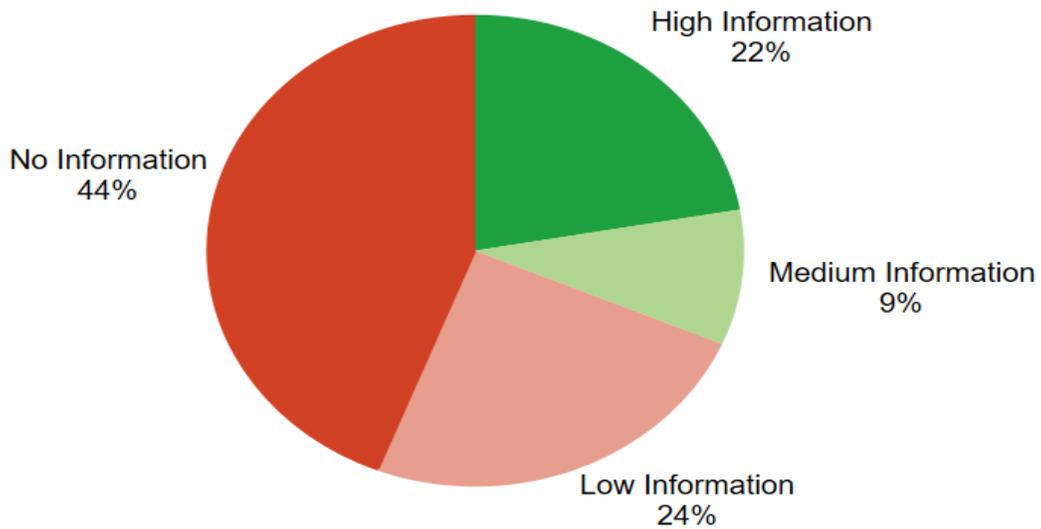
The Bureau aligned the collected information to four out of the five areas of focus outlined in the 2015 Joint Policy Standards, which were previously discussed:

- Organizational Commitment to Diversity and Inclusion
- Workforce Profile and Employment Practices
- Supplier Diversity
- Practices to Promote Transparency of Organizational Diversity and Inclusion

The data collected was organized into 20 criteria, including: The presence of clear statements that affirm a commitment to diversity and inclusion on a company's website, careers page, or from senior leadership; the workforce diversity metrics an entity publishes; public information regarding internal practices like recruitment strategies, diversity and inclusion trainings, or employee resource groups; and, information about supplier diversity programs.

The Bureau also rated the entities based on the level of information being shared publicly. Entities were rated "high information" if they published six or more of the 20 criteria items; "medium information" if they published between four and six criteria items; "low information" if one to three criteria items were published either on their website or in an annual report.

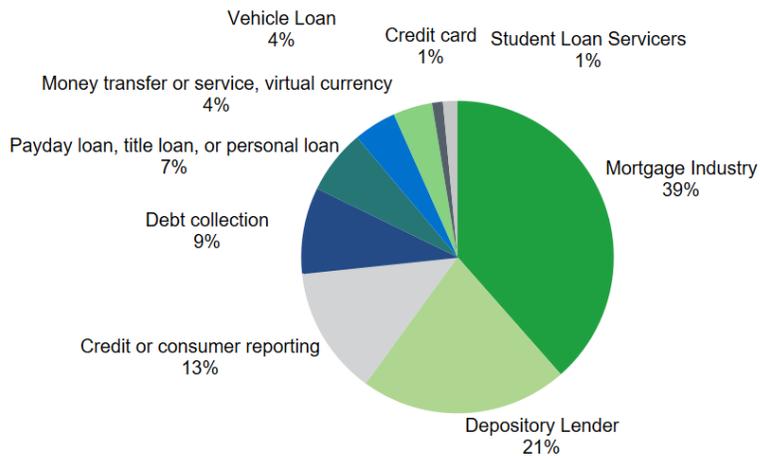
FIGURE 29: INFORMATION LEVEL BREAKDOWN— 2019 ASSESSMENT PERIOD



- Information Level
- High Information
 - Medium Information
 - Low Information
 - No Information

The sample was comprised of 270 regulated entities, including both depository and non-depository institutions. These include the largest bank lenders, as well as mortgage originators and servicers, credit reporting companies, debt collection companies, small-dollar lenders, and other financial service providers. The following chart outlines the industry breakdown of the surveyed institutions.

FIGURE 30: INDUSTRY BREAKDOWN — 2019 ASSESSMENT PERIOD



- Industry Group
- Mortgage Industry
 - Depository Lender
 - Credit or consumer reporting
 - Debt collection
 - Payday loan, title loan, or personal loan
 - Money transfer or service, virtual currency
 - Vehicle Loan
 - Credit card
 - Student Loan Servicers

Results

Some of the results have been encouraging, while others point to opportunities to increase public visibility of diversity and inclusion in the financial services sector. The results of the sample showed an extremely mixed picture of the financial services sector’s progress on public diversity and inclusion information: 44% of the sample (119 entities) had no public information about diversity and inclusion efforts on their website or in annual reports. In contrast, 22% of entities sampled (60) had high information availability on their websites or public documents.²⁷

²⁷ Defined “high information” as publishing >6 of the 20 criteria analyzed available; “medium information” entities published between 4 and 6 criteria, and “low information” published between 1 and 3 criteria.

Overall, depository lenders had the highest amount of information availability. Debt collection companies; payday, title, personal loan companies; and vehicle loan companies had no, or low, public information availability. The mortgage industry, to which the Bureau has done extensive diversity and inclusion outreach, had mixed availability, with just under half of entities sampled having information available on their public websites or in public documents.

TABLE 12: SAMPLE BREAKDOWN BY INDUSTRY AND INFORMATION LEVEL— 2019 PUBLICLY AVAILABLE DATA

Industry Groups	High Information	Medium Information	Low Information	No Information	Total
Mortgage Industry	6	4	35	59	104
Depository Lender	36	11	10	1	58
Consumer Reporting	8	4	8	16	36
Debt collection	1	3	4	16	24
Payday loan, title loan, or personal loan	0	1	3	14	18
Money transfer or service, virtual currency	2	2	2	6	12
Vehicle Loan	3	0	2	6	11
Credit card	3	0	0	0	3
Student Loan Servicers	1	0	2	1	4

Across the four standards, depository lenders represented the highest proportion of entities with public information for each of the policy areas. Detailed information on each of the results from each of the four focus areas is in Appendix D.

Conclusion

In addition to the information collected from the entities’ diversity and inclusion self-assessments, the sampling of publicly available information helps to guide the Bureau’s diversity and inclusion outreach efforts. The information obtained helps the Bureau tailor specific recommendations for improving diversity and inclusion practices in different sectors of the financial services industry. While the sample size for submitted self-assessment data is small, the Bureau found correlations between submitted assessment data and our research of entities’

diversity and inclusion policies and practices. As expected, smaller institutions had fewer diversity and inclusion programs and policies. Larger depository institutions consistently outperformed all other institutions in terms of overall diversity and inclusion efforts. There are opportunities for small and mid-size institutions to adjust their public websites to highlight their diversity and inclusion efforts and better demonstrate diversity and inclusion commitment.

The Bureau will continue its public-facing diversity and inclusion research in conjunction with the collection of entity self-assessments and track the progress of researched entities annually. That data creates an additional opportunity for organizations to examine their diversity and inclusion policies and to align their diversity programming to their peers.

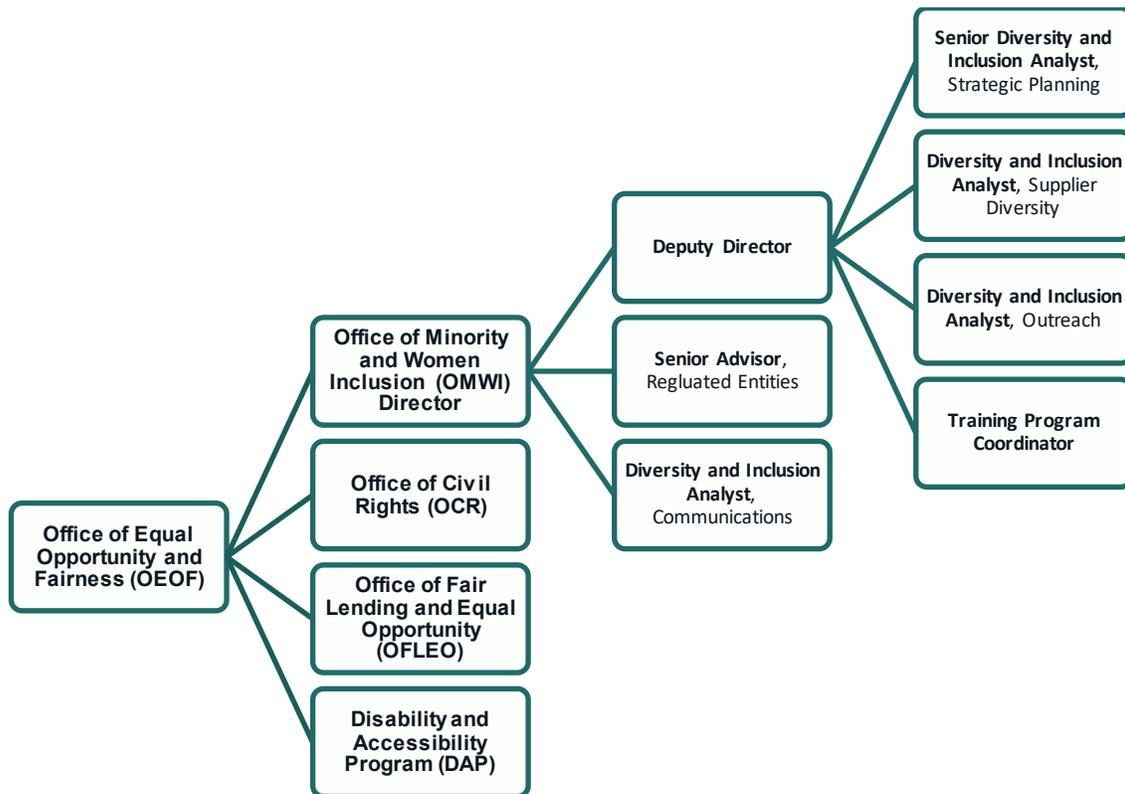
Studies show that executing an organizational commitment to diversity and inclusion is crucial for institutions to remain competitive. Increasingly reports, like the May 2020 McKinsey Report, *Diversity Wins: How Inclusion Matters*²⁸, indicate that the need for gender and ethnic diversity and inclusion in leadership in organizations can have an impact on a company's bottom line. Participating in the diversity and inclusion self-assessment process provides financial institutions with a way to assess and prioritize their diversity and inclusion programming and policies.

²⁸ McKinsey Report.

<https://www.mckinsey.com/~/media/McKinsey/Featured%20Insights/Diversity%20and%20Inclusion/Diversity%20wins%20How%20inclusion%20matters/Diversity-wins-How-inclusion-matters-vF.pdf>

Appendix A

OMWI Organizational Chart and Staff List



The OMWI team is made up of eight (8) full-time staff and no part-time staff. In addition, the team currently has one person from the Director's Financial Analyst Program for the period of one year:

- Director: Leads and coordinates all activity of the OMWI
- Deputy Director: Assists the Director in carrying out all activities of the OMWI
- Senior Advisor: Leads and coordinates regulated outreach activities
- Senior Diversity and Inclusion Analyst: Leads Bureau divisional strategic planning
- Diversity and Inclusion Analyst: Coordinates OMWI internal and external communications
- Diversity and Inclusion Analyst: Leads supplier diversity activities

- Diversity and Inclusion Analyst: Leads OMWI outreach activities
- Training Program Coordinator: Leads and Coordinates OMWI training activities

Appendix B

Employee Resource Groups

ADELANTE (founded in 2016): ADELANTE’s mission is to foster professional and leadership development to improve Hispanic/ Latino representation at the Bureau through retention, recruitment, and recognition.

ASPIRE (Asian Pacific Islander Resource and Empowerment) (founded in 2018): The ASPIRE group supports networking, professional development, mentoring, and leadership opportunities at the Bureau and focuses on the recruitment, retention, learning, and advancement of Asian Americans and Pacific Islanders (AAPI).

PARENTS (founded in 2019): PARENTS is the newest Employee Resource Group at the Bureau. Its main goals are to cultivate a community of support for expecting, new, and experienced parents and guardians from all stages of life, to provide a channel for Bureau parents to help each other navigate parenthood and guardianship, and to promote a work environment supportive of the ever-changing needs of working parents.

PRIDE (founded in 2016): PRIDE is a network of Bureau employees focused on issues that are important to LGBTQ+ (Lesbian, Gay, Bisexual, Transgender, Queer, and Questioning, plus) employees and their allies. Its mission is to advocate for a diverse workplace and support the professional and personal development of its members at the Bureau.

RISE (Relate, Inspire, Serve, and Empower) (founded in 2017): RISE’s mission is to be a strategic partner with the Bureau to promote a culture of diversity and inclusion through continual learning and advancing the understanding and inclusion of Black employees and consumers.

SPARK (founded in 2018): SPARK’s main goal is to develop leaders, celebrate women, and ultimately improve the representation of women at the Bureau through recruitment, retention, and recognition.

Appendix C

FY 2020 Diversity and Inclusion Employee Engagement Events

2019 Event Month	Employee Engagement Event
October	<p>National Hispanic Heritage Month: On October 3rd, the Adelante Employee Resource Group and the OMWI presented a fireside chat in celebration of Hispanic Heritage Month titled <i>Hispanic Visionaries: Shaping the Future of Our Country</i>. The event featured Janey Murguia, President and CEO of Unidos US, the nation’s largest Hispanic civil rights and advocacy organization.</p> <p>National Disability Employment Awareness Month (NDEAM): On October 15th, 28th, 29th and 30th, the Disability and Accessibility Program hosted screenings of <i>Intelligent Lives</i> at Bureau headquarters. All screenings featured closed captioning in honor of NDEAM. A panel discussion about the film was held on October 16th, with Dahlia Shaewitz, Vice President of the Institute for Educational Leadership, and internal stakeholders, Jennifer Horan, Section 508 Program Manager and Sinajo Jasmir, Reasonable Accommodation Program Manager, both from the Office of Equal Opportunity and Fairness.</p>

2019 Event Month

Employee Engagement Event

November

Veterans Day: On November 14th, the OMWI and the Office of Servicemembers Affairs hosted a special tribute to all Bureau Veterans at an event entitled *Service: Honoring All Who Served*, with remarks from Jim Rice, Director, Office of Servicemember Affairs.

Military Families Month: On November 21st, the OMWI and the Office of Servicemembers Affairs hosted a lunch and learn event titled *Understanding the Financial Lives of Military Households*. Beth Conlin, from Blue Star Families, spoke about both the universal and unique financial challenges facing military families.

Native American Heritage Month: On November 26th, the OMWI hosted a lunch session titled *Working Together in Indian Country to Empower, Enforce and Educate Consumers*, and featuring David Johnson, Acting Chief, Division of Capital Investment, Bureau of Indian Affairs. This session focused on a discussion about the Bureau of Indian Affairs' economic development programs, including the Division of Capital Investment, and how the Bureau can better work with tribal governments, businesses, and communities.

2020 Event Month

Employee Engagement Event

February

Black History Month: On February 20th, the RISE Employee Resource Group hosted a panel discussion about the widening Black racial wealth gap to discuss the correlation between the lack of wealth and credit discrimination and the relevancy of the Bureau's work around access to credit and financial literacy.

PRIDE Event: On February 20th, the PRIDE Employee Resource Group hosted an event featuring a video from the Inclusion Allies Coalition titled *Gender Identity and Expression: Personal Journeys, Pronouns, and Policies*. The viewing raised awareness about gender identity and pronoun usage in the world and at the Bureau.

Racial Equity Event: On June 24th, CFPB jointly hosted a racial equity event with the Office of the Comptroller of the Currency, Federal Housing Financial Agency, U.S. Securities and Exchange Commission, National Credit Union Administration, Federal Deposit Insurance Corporation, the Federal Reserve Board and the U.S. Department of the Treasury. The event, *Beyond Words: Race, Work, and Allyship Amid the George Floyd Tragedy*, was a moderated discussion with Dr. Johnetta B. Cole and Howard Ross, focused on racism and racial inequities in country.

June

Asian Americans and Pacific Islanders (AAPI) Heritage Month: On June 5th and 10th, the ASPIRE Employee Resource Group hosted a movie viewing titled *Norman Mineta and His Legacy: An American Story*.

ASPIRE Event: On June 11th, as a follow up to the ASPIRE movie viewing, former Director Kraninger, the OMWI, and the ASPIRE Employee Resource Group hosted a question and answer session with several panelists: The former Transportation and Commerce Secretary Norman Mineta, Director and Co-Producer Dianne Fukami, and Co-Producer Debra Nakatomi.

Lesbian, Gay, Bisexual, Transgender and Queer (LGBTQ+) Pride Month: On June 10th, the Office of Civil Rights honored Pride Month in a webinar highlighting the *History of the Lavender Scare*, to teach employees about challenges faced by previous generations of LGBTQ+ civil servants. The event was planned and hosted by the PRIDE Employee Resource Group.

2020 Event Month

Employee Engagement Event

July

PRIDE Event: On June 17th, the PRIDE Employee Resource Group hosted a fireside chat hosted by Pride Chair Cyrus Mostaghim and featuring Keynote Speaker Dana Savage, Assistant Attorney General for the state of Washington, on her experience with transitioning. She also discussed her work on passing legislation “banning the gay panic defense” in Washington State, lessons learned, issues minorities face in consumer protection, and challenges minorities face as government employees, particularly the LGBTQ+ community.

RISE Event: On July 8th, the RISE Employee Resource Group and the Office of Fair Lending hosted an event entitled, *Unpacking the Black Wealth Gap - A Deeper Dive into the Historical Origins of Structural Racial Credit*. This event expanded on the initial racial wealth gap conversation held during Black History Month to take a deeper look into the origins of structural racial credit discrimination and its impact on Black communities.

Racial Equity Event: On Friday July 10th, the Bureau and National Credit Union Administration Chairman Rodney Hood participated in a fireside chat as a follow-up to the multi-agency OMWI event, *Beyond Words: Race, Work, and Allyship amid the George Floyd Tragedy*. This session focused on racial justice and racial inequalities in America.

OMWI Dialogues Series: On July 22nd, the OMWI offered its first session in the *OMWI Dialogues Learn More/Take Action* series, an OMWI-sponsored series of dialogues on racial equity open to all Bureau employees. Session #1 was titled *Confronting and Overcoming Bias* and featured a TED Talk by Vernā Myers.

August

Webinar on Racial Issues in America: On August 25th, The Office of Civil Rights hosted a webinar titled *Top 10 Ways to Be Antiracist*, to continue an open dialogue about America and its racial issues that have plagued our nation for centuries.

OMWI Dialogues Series: On August 4th, OMWI held its second OMWI Dialogues Learn More/Take Action session titled *Why Now? Black Lives Matter*. The basis for discussion was Brandeis University’s discussion panel titled *America’s Racial Reckoning: Black Lives and Black Futures in Historical, Political, and Legal Context*.

2020 Event Month

Employee Engagement Event

OMWI Dialogues Series: On August 17th, OMWI held its third OMWI Dialogues Learn More/Take Action series, titled *Understanding Privilege*. The basis for discussion was a TED Talk by Dr. Susan E. Borrego.

September

OMWI Dialogues Series: On September 9th, OMWI offered its fourth Dialogues Learn More/Take Action session titled *How to Be an Antiracist*. The basis for discussion was a prerecorded interview with author Ibram X. Kendi. OMWI collaborated with the RISE Employee Resource Group on this event.

OMWI Dialogues Series: On September 23rd, OMWI offered its fifth OMWI Dialogues Learn More/Take Action series titled *How to Be a Strong Ally*. The basis for discussion was an article by Rachel Wilkerson Miller titled *Allyship*. OMWI collaborated with the PRIDE and ASPIRE Employee Resource Groups on this event.

Appendix D

Bureau Research on Public Facing Industry Diversity and Inclusion Data

The Bureau's industry research was designed to support the diversity and inclusion self-assessment process by providing additional data on how financial institutions demonstrate a commitment to diversity and inclusion through public channels. The collected information focuses on four areas:

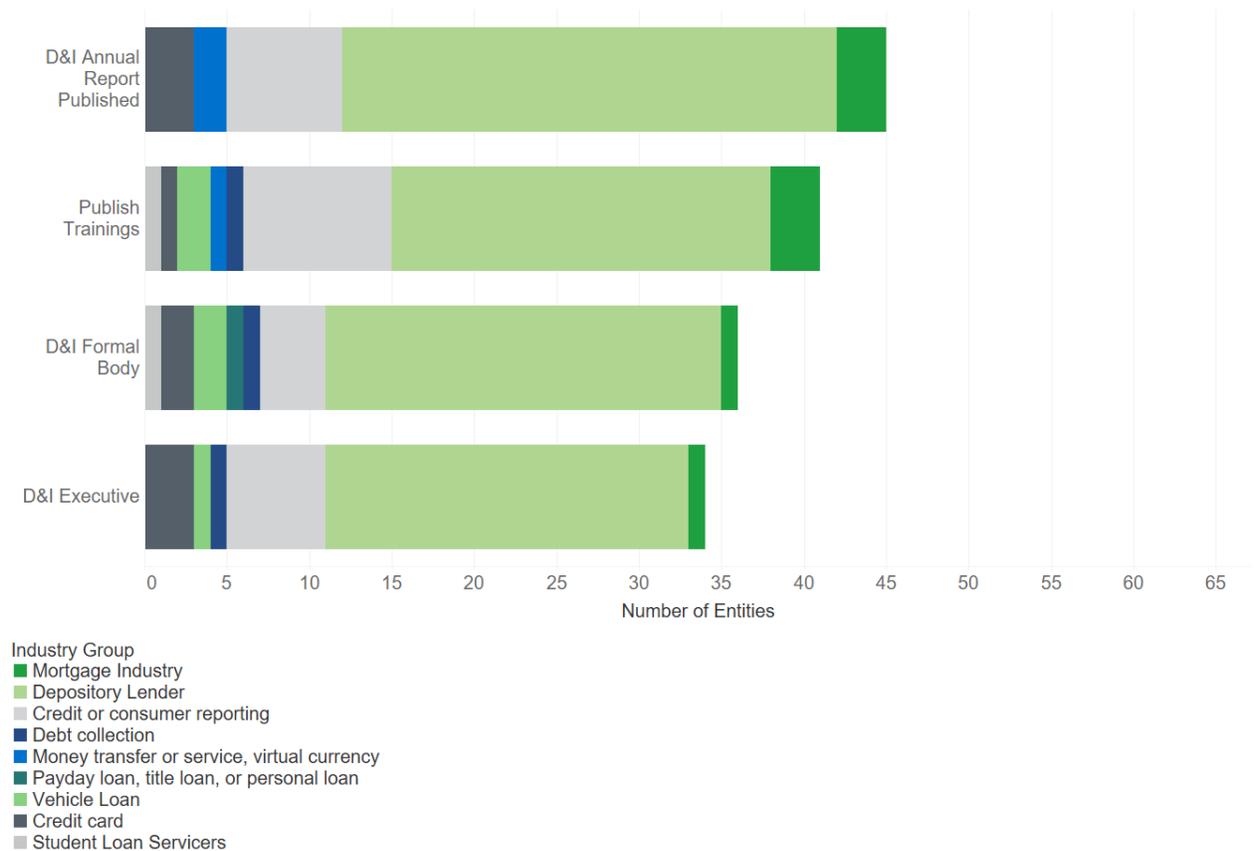
- Organizational Commitment to Diversity and Inclusion
- Workforce Profile and Employment Practices
- Supplier Diversity
- Practices to Promote Transparency of Organizational Diversity and Inclusion

Organizational Commitment

Regarding Organizational Commitment to Diversity and Inclusion, the most common practice was the publication of an annual diversity and inclusion report: 17% of sampled institutions publicized their report on their public websites; Fifteen percent (15%) of entities published details of trainings given to employees, which may include cultural competency training, unconscious bias training, or other diversity and inclusion related trainings and discussions. Formal body indicated the presence of a formal committee focused on furthering diversity and inclusion; less than 13% of the sampled entities had a formal body.

Few organizations outside of depository lenders had either a dedicated diversity and inclusion executive or a formal body directing diversity and inclusion efforts—instead, most chose to center their diversity and inclusion efforts within the human resources office, or to not publicize information on the employees responsible for diversity and inclusion within their organization.

FIGURE 31: ORGANIZATIONAL COMMITMENT TO DIVERSITY AND INCLUSION— 2019 ASSESSMENT PERIOD*

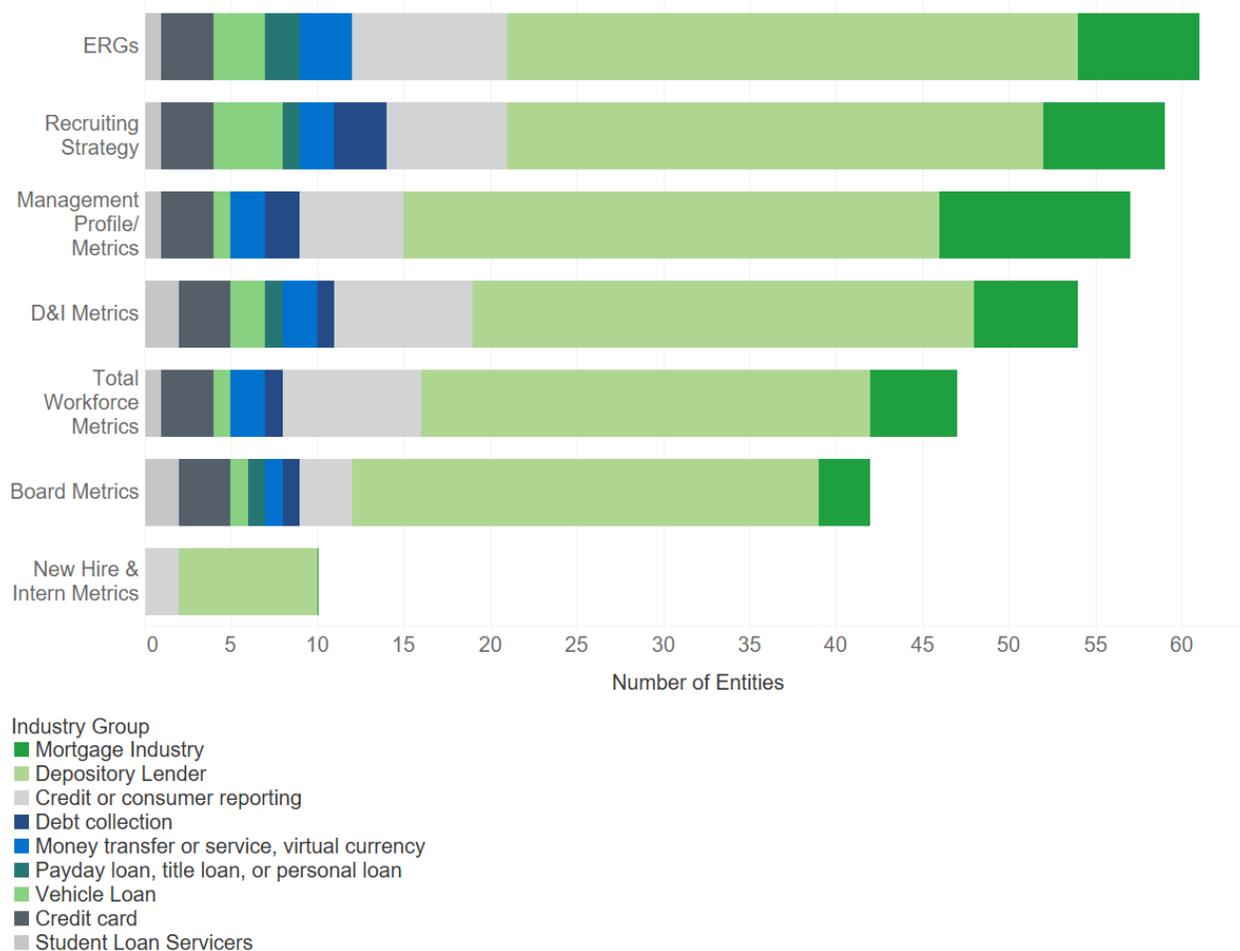


*Data based on publicly available information.

Workforce Profile and Employment Practice

Entities also demonstrated promising results in some aspects of Standard Two, Workforce Profile and Employment Practice—23% of entities sampled included information on Employee Resource Groups on their public websites and documents. Twenty-one (21%) of sampled entities publicized workforce demographic metrics or individual profiles of their management teams. Comparatively fewer entities broke down workforce demographic metrics to the board level or new hire level. Approximately 22% also included information on recruitment practices and goals, this included information about recruiting at Historically Black Colleges and Universities and Hispanic-Servicing Institutions, as well as community partnerships to increase the number of diverse candidates recruited for employment. While this does not necessarily indicate these companies aren’t undertaking tracking within their workforce, they are not publishing this data publicly.

FIGURE 32: WORKFORCE PROFILE AND EMPLOYMENT PRACTICES— 2019 ASSESSMENT PERIOD*

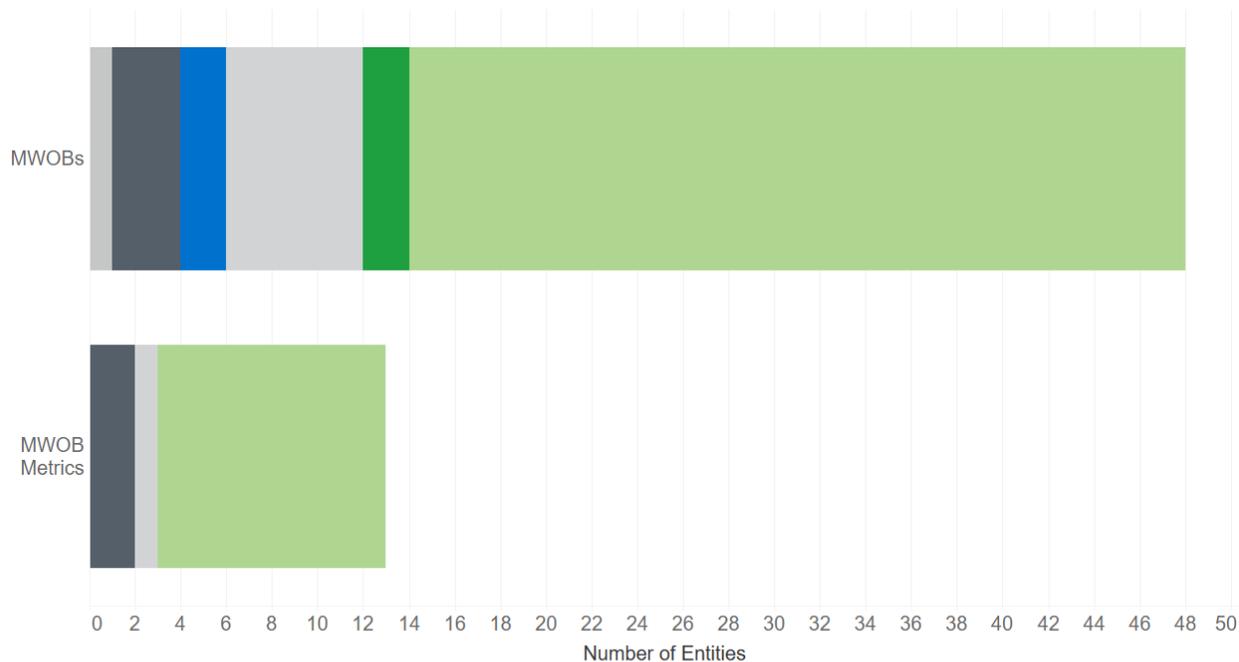


*Data based on publicly available information.

Supplier Diversity

Depository lenders had the strongest showing for Standard Three, Supplier Diversity, while other institutions had less publicized information about increasing diversity of contractor workforces. While an impressive 59% of sampled Depository Lenders had MWOB programs, comparatively fewer mortgage companies and other institutions published information related to an MWOB program. Only 13 companies sampled published metrics on MWOB-spend as a portion of total contracts. This outlines an opportunity to provide additional resources and information to entities regarding the importance of supplier diversity in relation to their overall diversity and inclusion strategy and programming.

FIGURE 33: PROCUREMENT AND BUSINESS PRACTICES SUPPLIER DIVERSITY— 2019 ASSESSMENT PERIOD*



- Industry Group
- Depository Lender
- Mortgage Industry
- Credit or consumer reporting
- Debt collection
- Money transfer or service, virtual currency
- Payday loan, title loan, or personal loan
- Credit card
- Student Loan Servicers
- Vehicle Loan

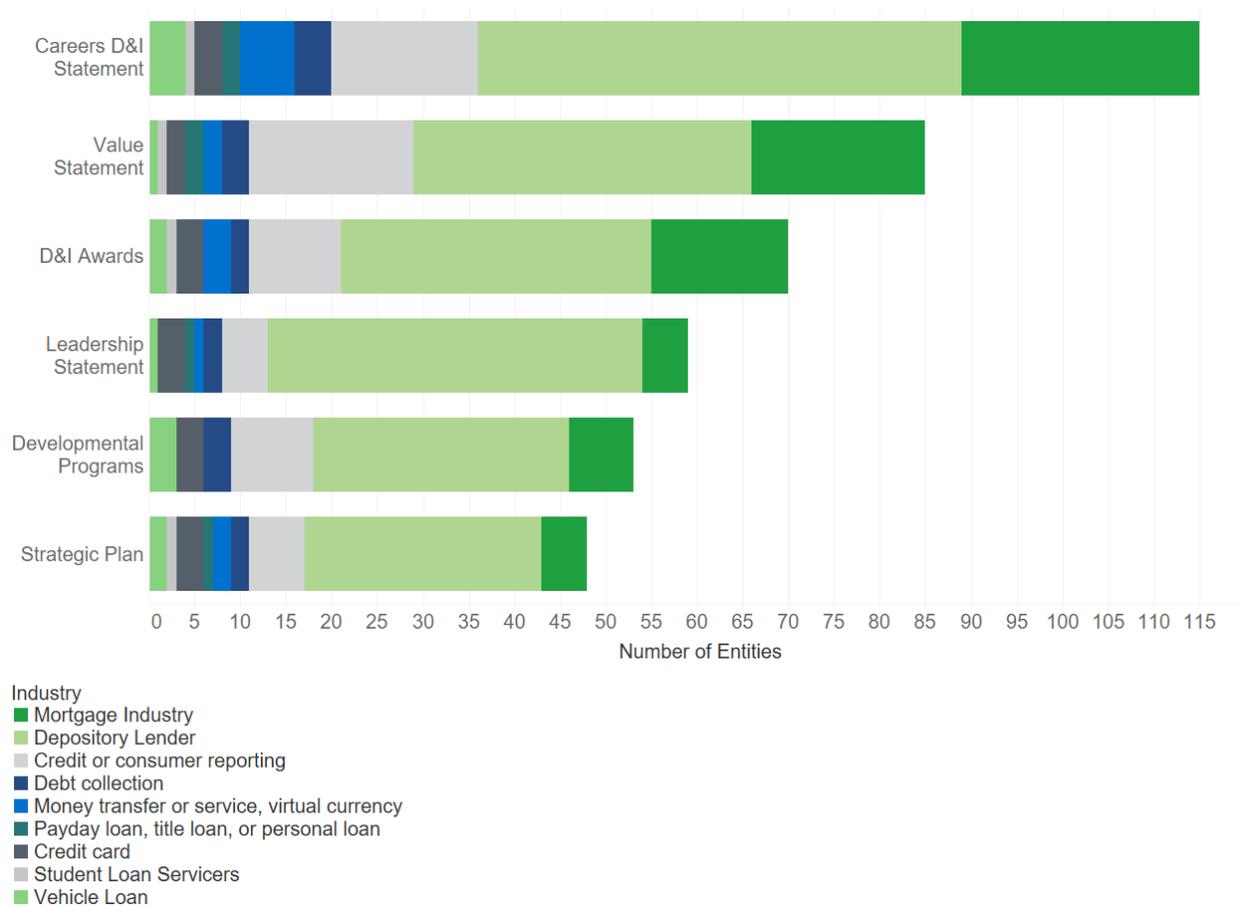
*Data based on publicly available information.

Transparency of Organizational Diversity

Measures for Standard Four, Practices to Promote Transparency of Organizational Diversity and Inclusion, had the highest percentage of entities with public information. Forty-three percent (43%) of sampled institutions had a diversity and inclusion statement on their careers page, which went beyond required Equal Employment Opportunity disclosures and emphasized a commitment to a diverse and inclusive workforce. Similarly, 31% of institutions sampled had a statement affirming a commitment to diversity and inclusion listed as a “core value,” and 22% of institutions had a statement directly authored by a senior leader (i.e., President, CEO) affirming commitment to diversity and inclusion. Twenty percent (20%) of entities published specific information about development and mentorship programs (outside of Employee Resource Groups), which may help attract more diverse talent; however, room for improvement exists in companies publishing their diversity and inclusion strategic plans.

Almost half of sampled depository lenders published this information, and few other institutions publicized any strategic goals for improving workforce diversity and inclusion.

FIGURE 34: PRACTICES TO PROMOTE TRANSPARENCY OF ORGANIZATION DIVERSITY AND INCLUSION— 2019 ASSESSMENT PERIOD*



*Data based on publicly available information.

The Bureau uses public sampling data during outreach meetings with trade organizations and institutions to make the case for improving diversity and inclusion practices and policies, and to communicate the importance of the self-assessment process in creating an accurate picture of the state of diversity and inclusion within the financial services industry. The Bureau has presented this data and tailored recommendations for trade organizations to communicate to their members. For example, recommendations for smaller non-depository lenders focus first on developing a public commitment to diversity and inclusion through careers statements and values statements, before recommending larger changes to company structures such as Employee Resource Groups and diversity and inclusion executives.