Diversity, Equity, Inclusion, and Accessibility (DEIA) Strategic Plan

FY 2022-2026



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Message from the OMWI Director

I am excited to share the Bureau's next Diversity, Equity, Inclusion, and Accessibility Strategic Plan. I want to reiterate, CFPB is fully committed to integrating diversity, equity, inclusion, and accessibility (DEIA) into our operations and mission work. Diverse backgrounds, perspectives, and experiences are critical to how we do our work and who we are as a Bureau. By promoting diversity and inclusion in our workplace, with the suppliers we do business with, and the financial institutions we regulate, we can best serve all consumers.

The five-year DEIA Strategic Plan (2022-2026) is grounded in the work CFPB does in compliance with Section 342 of the Dodd-Frank Act. The Office of Minority and Women Inclusion (OMWI) leads agency matters relating to diversity and inclusion in management, employment, and business activities. OMWI works in close collaboration with other Bureau offices to carry out those responsibilities. This Plan embodies those efforts. The Plan also aligns with Executive Order 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, released by the White House in 2021.

The Plan centers around six principal DEIA goals, and identifies diversity, equity, inclusion, and accessibility priorities and actions the Bureau seeks to advance. It is a forward-looking plan that reflects the evolution of our DEIA strategy, goals, and priorities along with the specific actions that will support them. As we move forward, CFPB will focus on advancing these strategies, goals, and actions. For example, a particular focus in the Plan is an emphasis on accessibility. The Bureau has made progress with accessibility issues, and with this plan seeks to further elevate the work in this priority area, to, in effect "Elevate the A."

I look forward to continuing to integrate DEIA into the fabric of CFPB and to help make the Bureau the best workplace it can be for all of us.

Sincerely,

Lora McCray

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Director, Office of Minority and Women Inclusion

CFPB DEIA Mission and Vision Statement

Vision Statement

The Consumer Financial Protection Bureau (CFPB or the Bureau) advances Diversity, Equity, Inclusion, and Accessibility (DEIA) and integrates DEIA into its business operations at all levels.

Mission Statement

The Consumer Financial Protection Bureau (CFPB) mission is to make consumer financial markets work for consumers, financial institutions, and the economy as a whole. We protect consumers from unfair, deceptive, or abusive practices and discrimination and take action against companies that break the law. We arm people with the information, resources, and tools they need to make informed financial decisions. We believe our employees' diversity in experiences and perspectives is essential to meeting the mission of the CFPB. Because of that, we are committed to ensuring that every employee's contribution is valued and respected. There is an interdependence between what we do externally and how we do our work internally. By examining how we operate, eliminating any systemic barriers to equal access of opportunities for Bureau employees, and fostering a culture of equity for all employees, the Bureau can best achieve its responsibility to protect consumers and ensure the needs of the most vulnerable consumers are met.

DEIA Definitions

The definitions below provide context for specific goals and actions in the DEIA plan. The "REE" definition explains the Bureau's values and principles around REE. The other definitions are taken directly from recent Presidential Executive Order 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, and are being widely used at the Bureau.

Accessibility

The term "accessibility" means the design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them. Accessibility includes the provision of accommodations and modifications to ensure equal access to employment and participation in activities for people with disabilities, the reduction or elimination of physical and attitudinal barriers to equitable opportunities, a commitment to ensuring that people with disabilities can independently access every outward-facing and internal activity or electronic space, and the pursuit of best practices such as universal design.

• Diversity

The term "diversity" means the practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities.

Equity

The term "equity" means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Inclusion

The term "inclusion" means the recognition, appreciation, and use of the talents and skills of employees of all backgrounds.

• Racial and Economic Equity (REE)

"Racial and economic equity" (REE) is systemic fairness or justice that gives every individual equal access to opportunities and the true ability to thrive regardless of race or economic status. Racial and economic equity is achieved when institutional structures, systems, policies, and practices provide situational fairness and equal opportunity; there is a democratic commitment to dismantling systems of oppression, racial bias, and discrimination in legal, sociopolitical, workplace, and cultural contexts; individuals thrive regardless of racial or cultural identity; and the most vulnerable and marginalized people and communities have the required tools to achieve social and financial mobility.

• Underserved Communities

The term "underserved communities" refers to populations sharing a particular characteristic, as well as geographic communities, who have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. In the context of the Federal workforce, this term includes individuals who belong to communities of color, such as Black and African American, Hispanic and Latino, Native American, Alaska Native and Indigenous, Asian American, Native Hawaiian and Pacific Islander, Middle Eastern, and North African persons. It also includes individuals who belong to communities that face discrimination based on sex, sexual orientation, and gender identity (including lesbian, gay, bisexual, transgender, queer, gender non-conforming, and non-binary (LGBTQ+) persons); persons who face discrimination based on pregnancy or pregnancy-related conditions; parents; and caregivers. It also includes individuals who belong to communities that face discrimination based on their religion or disability; first-generation professionals or first-generation college students; individuals with limited English proficiency; immigrants; individuals who belong to communities that may face employment barriers based on older age or former incarceration; persons who live in rural areas; veterans and military spouses; and persons otherwise adversely affected by persistent poverty, discrimination, or inequality. Individuals may belong to more than one underserved community and face intersecting barriers.

DEIA Strategic Plan

The Bureau's diversity, equity, inclusion, and accessibility strategy is based on Dodd-Frank Section 342, Executive Order No. 13583, the updated government-wide Diversity and Inclusion Plans issued by the Office of Personnel Management (OPM) in 2016 and 2021, the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, 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.

In FY 2022, OMWI began to develop a new five-year Diversity and Inclusion Strategic Plan. OWMI was developing the Bureau's future five-year Diversity and Inclusion Strategic Plan when Executive Order 14035, which established a government-wide initiative to advance diversity, equity, inclusion, and accessibility in all parts of the federal workforce, was issued in June 2021. The EO aligns with Bureau priorities and statuary requirements and the Bureau decided to voluntarily respond to the EO and share its Diversity Equity, Inclusion and Accessibility (DEIA) Strategic Plan in response to the EO 14035. Doing so enhances the Bureau's pursuit of its mission and aligns with the Bureau's diversity and inclusion goals and the statutory mandates of the Dodd-Frank Act.

The Bureau has made progress with addressing accessibility over the years, and to further that work has made a commitment to elevate Accessibility—Elevate the A—in this DEIA Strategic Plan. Many of the included actions are focused on ensuring that the Bureau culture, environment, and facilities are fully accessible to Bureau employees, applicants, and consumers who utilize our resources and services.

The five-year DEIA Strategic Plan will be implemented during years 2022 – 2026. The Plan is focused on six primary goals and each goal's corresponding actions. Together, these goals and actions embody all aspects of the Bureau's diversity, equity, inclusion, and accessibility work.

The Plan is posted on the CFPB external website <u>consumerfinance.gov</u> to promote transparency. In addition, CFPB will post a DEIA Strategic Plan Annual Progress Report on the website as a partner document to the Plan, to inform the public on the progression of our DEIA efforts.

DEIA Goals and Actions

Goal 1: Empower and support leaders in creating an equitable work environment where fair and equitable recruitment, hiring, pay, advancement, and retention practices are used at all levels are a priority.

Action 1: Demonstrate leadership commitment and accountability through agency policy, messaging, and behaviors that advance diversity, equity, inclusion, and accessibility goals and objectives.

• Barrier analysis projects are conducted, action items are implemented by stakeholder offices, and the annual MD-715 report is utilized to report barriers identified, progress made on action items, etc.

Action 2: Provide Bureau managers with necessary tools, resources, and training to grow and enhance their knowledge and skills in inclusive and equitable management.

- Expand the Bureau's Executive Coaching program to include managers at all levels and enhance managers' coaching skills to enable them to provide better management and development of staff.
- Pilot a "First Line Supervisor" coaching program.
- Develop a "Manager's Toolkit" to support the practical application of EEO and DEIA in the Bureau's work.

Goal 2: Develop an internal diverse talent pipeline.

Action 1: Pursue a comprehensive strategy to develop, prepare, and maintain a high-performing, competitive workforce by providing internal personal and professional training opportunities for Bureau employees at all levels when advancement opportunities are available.

• Create "Aspiring Leaders" career development program that will help non-supervisory CFPB employees build leadership skills to assist them in competing for supervisory and management positions within or outside of the Bureau.

- Create a" Project Management" and a "Program Management" career development program that will help CFPB employees build additional skills which may assist them in competing for relevant positions within or outside of the Bureau.
- Launch a "Career Development Pilot" to prepare employees for career growth and promotional opportunities.
- Provide learning sessions to brief employees and managers on how to increase use of Individual Development Plans and existing skill assessments, develop cross-training and cross-functional learning opportunities, and engage in ongoing mentoring and coaching programs.
- Evaluate opportunities to enhance equity in employment opportunities and financial security for employees with disabilities.
- Create an easy access, and clear, streamlined process for individuals who wish to apply for Schedule A positions at the Bureau

Action 2: Continue to build and maintain equitable and inclusive hiring, advancement and retention strategies, practices, and protocols.

- Assess recruitment materials to ensure effectiveness in attracting a broad range of talent, including individuals from underserved communities.
- Develop a targeted diversity outreach plan specifically focused on expanding partnerships with diverse organizations, including Historically Black Colleges and Universities and Hispanic Serving Institutions, and professional conferences.
- Use the "Ambassador Recruitment Program" to leverage Bureau staff in recruitment efforts.
- Continue to create multi-year hiring projections of the Bureau's hiring needs and develop an outreach and recruitment plan to seek a diverse applicant pool.
- Assess existing, and identify new, recruitment sources and activities to increase the
 diversity of eligible candidates in noted positions (Economists, Examiners, Director
 Financial Analysts, and, Technology and Innovation positions), the overall talent
 pipeline, and the leadership pipeline.
- Expand external partnerships with organizations representing diverse populations in the hiring and recruitment process.

- Improve the documentation and justification requirements for hiring, detail, and promotion decisions to eliminate bias.
- Evaluate the selection process, specifically the steps from cert to selection, to identify opportunities to increase consistency and accountability of selecting officials (requiring development and documentation of criteria for resume reviews and selection for interviews, expansion of justification requirements, requiring structured interviews).
- Conduct ongoing barrier analysis to identify and eliminate barriers to equal employment opportunity for protected groups, including review of the annual MD-715 report.
- Research and evaluate the efficacy and feasibility of diverse hiring practices such as implementing "blind resumes," and requiring structured interviews and diverse interview panels.

Goal 3: Foster a connected and psychologically safe culture where employees feel free to speak up and raise issues and concerns.

Action 1: Cultivate a supportive, welcoming, inclusive, and fair work environment that allows employees to feel connected to the Bureau's mission and contribute to their full potential.

- Use the Alternative Dispute Resolution Program to improve conflict literacy at the Bureau and resolve workplace conflict at the lowest level possible.
- Increase outreach to the workforce about the benefits of resolving conflicts at the earliest stage possible; benchmark other agencies to determine if there are other tools the ADR Program can implement; recruit and select new conflict coaches; collaborate with the Organizational Development Team in the Office of Human Capital when appropriate.
- Provide Diversity, Equity, and Inclusion (DEI) training for the Bureau workforce to foster inclusion and equity, including providing mandatory training for all Bureau employees and management that supports the DEI performance competencies.
- Collect Sexual Orientation Gender Identity (SOGI) data on employees to conduct barrier analysis through participation in the Office of Personnel Management (OPM) pilot to collect SOGI data.
- The Anti-Harassment Program will conduct trainings for employees and managers on harassment and the Bureau's policies on harassment.

- The EEO Program will continue to process EEO complaints efficiently and with the highest quality, meeting, or exceeding processing timelines.
- Continue to implement the Bureau's "Mentoring for Success Program" including conducting targeted outreach for a diverse mentor and protégé pool of matches.
- Ensure that applicants and employees with disabilities have access to information about reasonable accommodations, workplace personal assistance services, and communication technology.
- Host information sessions and webinars on disability rights and accommodations.
- Conduct the "OMWI Dialogue Series" to facilitate open communication and engagement among the workforce on topics related to diversity, equity, and inclusion.
- Host and conduct heritage and cultural events and commemorations to build employees' cultural awareness, intelligence, and competency.
- Develop and provide information and resources to advance the workforce's DEIA knowledge and understanding, and the connection to the Bureau's mission work.
- Ensure that all information and communication technology and products developed, procured, maintained, or used by the bureau are accessible and usable by employees with disabilities consistent with all standards and technical requirements of the Rehabilitation Act of 1973.
- Continue to conduct training sessions to educate staff responsible for procuring technology on the requirements necessary to comply with the Rehabilitation Act and create reference materials, such as checklists, that will serve as a resource for individuals responsible for procuring or developing technology.
- Implement a new tool to scan files for accessibility.
- Review CFPB Design Systems Guidelines annually.
- Regularly assess information technology and facilities against benchmarks and industry standards to support equitable access and to remove potential barriers.

Action 2: Continue to encourage employee engagement and foster participation in employee affinity groups such as Employee Resource Groups (ERGs) and the Diversity and Inclusion Council of Employees (DICE).

Goal 4: Prioritize doing business with Minority and Womenowned Businesses (MWOBs) and eliminate barriers to equal participation.

Action 1: Advance diversity, equity, and inclusion in the Bureau's supplier diversity by prioritizing work with MWOBs, facilitating MWOB contracting opportunities, and providing technical assistance to MWOBs.

- Prioritize doing business with MWOBs and eliminate barriers to equal participation.
- Provide guidance to divisions on supplier diversity and collaborate with the Office of Procurement to ensure MWOB opportunities are maximized in Bureau contracting. Activities include, but are not limited to divisional briefings, procurement pipeline meetings, and market research.

Action 2: Conduct Good Faith Effort (GFE) analyses and assessments of Bureau contractors' workforce diversity.

- Collect and assess Good Faith Effort (GFE) data from Bureau contractors for GFE compliance.
- Develop a mechanism to automate this process.

Action 3: Make recommendations to the Bureau Director on the impact of Bureau policies on MWOBs.

Goal 5: Promote Diversity and Inclusion efforts within the financial services industry consistent with the Joint Standards for Assessing and Diversity and Inclusion Practices in Regulated Entities.

Action 1: Confidentially enable voluntary data collection and self-assessment data submissions by institutions regulated by the Bureau.

- Maintain Inclusivity Portal to collect and assess diversity and inclusion self-assessment data submissions.
- Provide a framework for financial organizations to build and strengthen their diversity, equity and inclusion policies and programs.
- Explore developing data collection forms customized by entity size for small, medium, and large entities.

 Create reports and share best practices that can be replicated by financial institutions to enhance their own diversity and inclusion efforts.

Action 2: Engage in research of diversity and inclusion in the financial services industry and share best practices that can be replicated by financial institutions to enhance their own diversity and inclusion efforts.

Goal 6: Develop strategies and processes to promote and sustain an inclusive and equitable culture at the Bureau.

Action 1: Promote transparency and communication about DEIA utilizing a broad range of CFPB communication channels.

 Ensure all available channels are used to promote and communicate DEIA activities and messaging. Examples include: CFPB Digest, monthly OMWI Director messages, Wiki announcements, the Manager Minute newsletter, and other distribution of DEIA materials and resources.

Action 2: Continue to build DEIA core competencies for all staff and ensuring all employees have access to DEIA training, education, and relevant legal requirements.

- Ensure mandatory and supplemental DEI training is conducted across the Bureau.
- Provide guidance on diversity and inclusion and Racial and Economic Equity (REE) to divisions and support implementation of their annual DEI strategic action plans.
- Monitor the divisions DEI strategic plan implementation efforts through quarterly meetings and the annual biannual review process to discuss action items and outcomes.

Action 3: Consistently review, analyze, and report, internally and externally, on the agency's DEIA progress.

- Submit the Annual OMWI Report to Congress.
- Complete annual DEIA program progress report and share on the Bureau's public-facing website.

Monitoring and Evaluation

As part of the DEIA Strategic Plan implementation, the Bureau will monitor and evaluate progress on its DEIA goals and actions on an ongoing basis. The OMWI Office will lead the collaborative evaluation process by meeting with relevant business offices on a regular basis to track their progress and evaluate any successes or challenges. Additionally, the Bureau will report on the DEIA Strategic Plan in its OMWI Annual Report to Congress each year.

To promote transparency, the Plan is posted on the CFPB external website, <u>consumerfinance.gov</u>. CFPB will keep the public, and its stakeholders, informed of its progress on the Plan by posting an Annual Progress Report on the website as a partner document to the DEIA Strategic Plan. The Annual Progress Report will give an updated, real-time status of how each goal and action are progressing during the five-year implementation of the Plan.