

## Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWD) Answer No
- b. Cluster GS-11 to SES (PWD) Answer No

While there is no trigger, please note that the CFPB does not fall under the GS pay clusters and therefore uses the following EEOC approved salary clusters: Using the salary clusters and including data from completed Forms SF-256, data on 30% or more disabled veterans, and data on Schedule A(u) appointments which are allowable under the Section 501 regulations, there are no triggers for PWD. As of September 30, 2020, 25.00% of employees earning less than \$72,030 were PWD and 13.16% of employees earning \$72,030 and above were PWD. \* Salary threshold of \$72,030 represents salary for an employee paid at the GS-11 Step 1 level in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA ("Washington DC") locality area as of September 30, 2020. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf>.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWTD) Answer No
- b. Cluster GS-11 to SES (PWTD) Answer No

While there are no triggers, please note that the CFPB does not fall under the GS pay clusters and therefore uses the following EEOC approved salary clusters: Using the salary clusters and including data from completed Forms SF-256, data on 30% or more disabled veterans, and data on Schedule A(u) appointments which are allowable under the Section 501 regulations, there are no triggers for PWTD. As of September 30, 2020, 6.25% of employees earning less than \$72,030 were PWTD and 3.04% of employees earning \$72,030 and above were PWTD.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	44	9	20.45	3	6.82
Grades GS-11 to SES	1385	152	10.97	41	2.96

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

The Disability Compliance Program Manager (DCPM) held Bureau-wide meetings to highlight the requirements under the Rehabilitation Act, including the 12% and 2% numerical goals. The numerical goals were also communicated to all employees via digital distribution channels (e.g., in the Bureau’s Weekly/ Digest and Manager Minute publications). Further, the Office of Equal Opportunity and Fairness (OEOF) informed all Division leaders about the Bureau’s Section 501 Affirmative Action Plan (AAP) and numerical goals as part of ongoing D&I strategic planning discussions and encouraged Division leaders to socialize the goals within their Divisions (including to hiring managers). Finally, former Director Kraninger referenced the Agency’s goals in an all managers communication and in a Bureau all hands during National Disability Employment Awareness Month (NDEAM) message highlighting the importance of, and commitment to leveraging Schedule A(u) and other non-competitive hiring authorities that promote disability hiring and advancement.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

- Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer Yes

N/A

- Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	3	0	0	CFPB_ReasonableAccommodations@cfpb.gov
Section 508 Compliance	1	0	0	CFPB_Accessibility@cfpb.gov
Special Emphasis Program for PWD and PWTD	0	0	1	CFPB_DisabilityProgram@cfpb.gov
Architectural Barriers Act Compliance	0	0	1	CFPBFacilities@cfpb.gov

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	3	0	0	Department of Treasury's Bureau of the Fiscal Service (BFS), CFPB's third-party service provider, CFPBINQUIRIES@fiscal.t
Answering questions from the public about hiring authorities that take disability into account	3	0	0	Department of Treasury's Bureau of the Fiscal Service (BFS), CFPB's third-party service provider, CFPBINQUIRIES@fiscal.t

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

In FY 2020, many trainings normally offered in-person were cancelled due to COVID-19 pandemic and safe distancing protocols. Bureau staff, required to work in a mandatory and/or maximum telework capacity with restricted travel, attended virtual trainings offered by organizations external to the Bureau. The Bureau did provide internal trainings offered annually, and plan to attend virtual trainings offered in FY2021. Disability program staff received the following targeted training: • Members of DAP, OCR and Office of Human Capital (OHC) staff attended the following trainings: • Employer Assistance and Resource Network (EARN) on Disability Inclusion sessions via webinars offered throughout the year on multiple disability services and program topics. • Federal Dispute Resolution (FDR) training, which included various sessions on reasonable accommodation-related issues and case law updates along with panel discussions. • EEOC’s EXCEL Training Conference. Other training and events staff attended included: EEOC/Federal Exchange on Employment and Disability (FEED) training, Small Agency 501 Affirmative Action Regulation Working Group sessions, and the DVAAP Forum and Overview. There were also internal briefings hosted by DAP where the Bureau’s AAP and the Section 501 statutory and regulatory requirements were highlighted.

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

The Bureau provided sufficient funding and other resources to successfully implement the disability program during the reporting period. In FY 2020, the Bureau maintained funding and resources for disability programs and services and will continue to provide funding and resources. During this reporting period, the Bureau onboarded a new Reasonable Accommodations Coordinator (RAC) to provide additional program support for the Reasonable Accommodations Program. The Bureau continues to provide the budget to support and ensure sufficient resources are available for the entire disability program. The Bureau’s current budget supports Reasonable Accommodations ,which includes funding to support and implement enhancements to the reasonable accommodations tracking system (Entellitrak), Accessibility, and 508 efforts.

**Section III: Program Deficiencies In The Disability Program**

**Section IV: Plan to Recruit and Hire Individuals with Disabilities**

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

**A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES**

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

The Bureau continues to recruit PWD and PWTD using digital and social media outreach such as LinkedIn and the Bureau’s career page at [www.consumerfinance.gov/jobs](http://www.consumerfinance.gov/jobs). The Bureau encourages individuals with disabilities to apply under the Schedule A(u) Hiring Authority to open positions, which are posted on USAJOBS. The Bureau’s OHC Staffing and Talent Acquisition team and the DCPM also encourage hiring managers to utilize programs such as Workplace Recruitment Program (WRP) and OPM’s Bender List to identify, interview, and hire PWD and PWTD non-competitively without vacancy announcements when possible.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

The Bureau encourages individuals with disabilities (e.g., Schedule A(u), 30% or more disabled veterans, etc.) to apply for positions that are posted via vacancy announcements on USAJobs. Individuals with disabilities who meet minimum qualifications and provide the appropriate documentation are referred to the hiring manager for consideration. This determination is made by the Bureau’s third-party service provider, Department of Treasury’s Bureau of the Fiscal Service (BFS). With the continued use of the Schedule A(u) hiring authority, CFPB continues to leverage the WRP through the Department of Labor and existing registries housed on [www.max.gov](http://www.max.gov).

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual’s application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The Bureau requests hiring managers use non-competitive hiring authorities. As per the Bureau’s Schedule A Directive, if an applicant with eligibility under a hiring authority that takes disability into account is selected, OHC provides guidance to the hiring manager on how the individual may be appointed. If the candidates with disabilities who meet minimum qualifications and provide the appropriate documentation and are sourced through vacancy announcements on USAJOBS, are referred to the hiring manager for consideration. This determination is made by the Bureau’s third-party service provider, Department of Treasury’s Bureau of the Fiscal Service (BFS). If a hiring manager identifies a position that they would like to fill outside of the vacancy announcement procedures, the Bureau’s DCPM and Staffing Consultants in OHC work with the hiring manager to identify eligible candidates from pre-approved disability resume databases, such as the WRP database and existing registries housed on [www.max.gov](http://www.max.gov), as outlined in the Bureau’s Schedule A(u) Directive. In the non-vacancy announcement process, the eligibility is determined by the third-party database, verified by the DCPM and OHC Staffing and Talent Acquisition team. The hiring managers for these positions are provided with an overview of the hiring authorities that take disability into account prior to and throughout the hiring process, and they are provided with resumes of eligible disabled candidates for consideration. All medical documentation is collected by either the DCPM or OHC for eligibility verification only. No medical documentation is sent to or shared with the hiring manager.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer Yes

The OHC Talent Management team delivers Supervisory Development Seminars (SDS), a one-time training CFPB requires all supervisors/managers (at all levels) to take within their first supervisory year, and as a refresher course required for managers to complete every 2-3 years. This training includes a section on hiring authorities such as Schedule A(u). The Office of Civil Rights (OCR) and DAP also circulate information to managers about this hiring flexibility through the digital (email) bi-weekly Manager

Minute publication and on the Bureau’s intranet site. Written materials (such as the EEOC brochures on using the Schedule A(u) hiring authority) are also made readily available on display stands throughout CFPB facilities. The DCPM and Staffing Consultants assigned to each office also assist managers with all staffing related inquiries, to include Schedule A(u) and other hiring authorities that take disability into account. The DCPM also provides Schedule A(u) and other disability related hiring authority overviews annually during regional, leadership, and individual management meetings.

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The DCPM, along with other Bureau stakeholders in OHC and OMWI, continued to maintain contact and work with organizations/ programs that assist PWD and PWTD, such as the Job Accommodation Network (JAN), Employer Assistance and Resource Network (EARN), Workplace Recruitment Program (WRP), Veterans, and Wounded Warrior programs to promote employment opportunities. The Bureau also continues to rank on the Top 20 Government Employers list of the CAREERS & the disABLED Magazine. The Bureau again ranked number 14th on the list featured in the Winter 2020 edition of the magazine. National readers of CAREERS & the disABLED magazine selected the top companies and/or government agencies in the country for which they’d most like to work or which they believe would provide a positive working environment for people with disabilities. OHC, Office of Minority and Women Inclusion (OMWI), DAP, and OCR as appropriate, coordinate annually on outreach and recruitment strategies and priorities. Along with the continued use of the Schedule A(u) hiring authority, the CFPB continues to explore how to best leverage WRP through the Department of Labor and existing registries housed on www.max.gov. In FY 2021 on the recommendation of the EEOC Technical Assistance letter dated January 25, 2021, the agency plans to further build upon our relationships with other external stakeholders, such as; America Job Centers, State Vocational Rehabilitation Agencies, Centers for Independent Living, and Employment Network Service providers, in efforts to build partnerships to assist the Bureau in its efforts to employee PWD/PWTD. Please find more details on the plans highlighted and outlined in Section VII of this report.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

- a. New Hires for Permanent Workforce (PWD) Answer Yes
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

There were triggers identified in the permanent workforce in this category. In FY 2020, the Bureau had 126 permanent new hires, 12 of which (9.52%) were PWD and 1 (0.79%) of which was a PWTD.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	3852	13.24	1.35	6.00	0.65
% of Qualified Applicants	2640	12.50	1.48	5.15	0.57
% of New Hires	67	8.96	0.00	4.48	0.00

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD)

Answer Yes

The Bureau has four mission critical occupations (MCOs): 0110/Economists, 0301/Miscellaneous Administration & Program, 0570/Examiners, 0905/General Attorneys. In FY 2020, there are triggers for PWD for the permanent new hires when compared to the qualified applicant pool for all four MCOs. There were qualified PWD in all MCOs, except the 0110 series. There were new hires selected in three series with qualified PWD, but it was at a lower rate than the qualified applicant pool representation. There are triggers for PWTD for the permanent new hires when compared to the qualified applicant pool for 0110 and 0905 series. There were qualified PWTD in these series, but a PWTD was not selected.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0110ECONOMIST	4	900.00	0.00	425.00	0.00
0301MISCELLANEOUS ADMINISTRATION AND PROGRAM	36	658.33	11.11	269.44	5.56
0570FINANCIAL INSTITUTION EXAMINING	17	152.94	5.88	47.06	5.88
0905GENERAL ATTORNEY	15	206.67	6.67	93.33	0.00

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Qualified Applicants for MCO (PWD) Answer No

b. Qualified Applicants for MCO (PWTD) Answer No

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Promotions for MCO (PWD) Answer Yes

b. Promotions for MCO (PWTD) Answer Yes

In FY 2020, triggers exist for PWD and PWTD when comparing internal selections in the 0301/Misc. Admin. & Program to the qualified applicant pool. There were zero internal selections made of PWD or PWTD in this series.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

The OHC continued to post all internal advancement opportunities, details, temporary promotions and reassignments on the Bureau’s internal website and ensure that these opportunities are listed on the Daily Announcements feed on the Agency’s intranet so that all employees are informed. Additionally, the Bureau’s DCPM will continue to encourage PWD and PWTD to apply to opportunities, and promote reassignment, promotion, detail, and temporary promotion opportunities that become available to ensure that PWD and PWTD are aware of them. The DCPM will also partner with OHC and OMWI to promote internal advancement opportunities. The OHC continued to post all internal advancement opportunities, details, temporary promotions and reassignments on the Bureau’s internal website and ensure that these opportunities are listed on the Daily Announcements feed on the main page of the Agency’s intranet so that all employees are informed. Additionally, the Bureau’s DCPM will continue to encourage PWD and PWTD to apply to opportunities, and promote reassignment, promotion, detail, and temporary promotion opportunities that become available to ensure that PWD and PWTD are aware of them. The DCPM will also partner with OHC and OMWI to promote internal advancement opportunities. Other advancement opportunities include: • Promoting the use of training courses available through the Bureau’s Learning Management System in efforts to improve professional development. • Encouraging all employees to utilize the Bureau’s Career Development Framework and other internal resources to enhance the growth and development of all employees. • Promoting the development of personal learning and development goals and helping employees to develop and implement Individual Development Plans. OCR and DAP will continue co-leading barrier analysis efforts to assist with providing or improving internal advancement opportunities for PWD and PWTD. The Bureau has plans outlined in Section VII of this report.

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

The Bureau continues to offer career development tools and resources that assist all employees, to include PWD and PWTD, with skill development. The Bureau’s Career Development Framework and other internal resources for professional growth and development continue to be available to all Bureau employees, including PWD and PWTD, interested in promoting their career and development goals. Examples include: Individual Development Planning and Career Development Workshops, continuation of the Bureau Team Leader training program, the matrix of courses for Aspiring Leaders, and continued availability of external training and development opportunities. Additionally, the Bureau advertised internal detail opportunities to Bureau employees using a Centralized Detail Posting Process. In FY 2020, Bureau managers leveraged internal details, temporary promotions, and reassignments to develop staff and augment work throughout the fiscal year. Internal career opportunities are posted on the Bureau’s intranet site. External posting are posted on the Bureau’s website as well as on the Daily Announcements feed on the Bureau’s intranet, which is widely seen by all Bureau employees. Employees are also encouraged to apply for any position that they feel they may qualify in the competitive hiring process. In FY 2020, CFPB provided external applicants opportunities through virtual competitive student internship opportunities and fellowship programs (such as the Honors Attorney Program, Research Assistant Program, and the Director’s Financial Analysts Program). The Bureau used competitive details to provide general growth opportunities for existing employees.1 Throughout FY 2020, internal employees were also able to participate in an internal mentorship program in efforts to identify professional skills and growth opportunity. Bureau managers also participate in mandatory management training and all Bureau executives are eligible to participate in the Bureau’s executive coaching program.2 As part of the Bureau’s ongoing barrier-analysis efforts, we are investigating the feasibility and need for creating disability-specific development programs and/or for more data collection. More details are provided below in Section VII. Footnote 1: We reviewed the detail program data, but the row is marked as ‘NA’ on the next chart since there were zero selections made during FY 2020 where applicants provided their self-identification information pertaining to their disability status. Footnote 2: The Bureau has Coaching Programs and Training Programs opportunities (ex. management training and executive coaching). These opportunities are marked NA on the chart below because the bureau doesn’t currently use a competitive selection process for these opportunities. Employees are either eligible or not for these opportunities. You can only attend manager training if you are a manager and participation is available to and required of all managers, and you can only participate in the executive coaching opportunity if you are a Bureau executive.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Fellowship Programs	715	10	9.8	0.0	4.6	0.0

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	70	70	11.4	11.4	1.4	1.4
Coaching Programs	N/A					
Other Career Development Programs	N/A					
Detail Programs	N/A					
Training Programs	N/A					
Internship Programs	216	12	6.5	8.3	4.6	0.0

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer No
- b. Selections (PWD) Answer Yes

In FY 2020, a trigger exists for selections in the Fellowship Programs (0.0% PWD selected compared with 9.8% PWD applied). Selections in this data set included Recent Graduates (Examiner), Fellows (Director’s Financial Analyst) and Research Assistants.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer No
- b. Selections (PWTD) Answer Yes

In FY 2020, a trigger exists for selections in the Internship and Fellowship Programs (0.0% PWTD selected versus 4.6% PWTD applied in both data sets).

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

For PWD and PTWD, the EEOC instructs agencies to use the Inclusion Rate (IR), which compares the number of people within the target population (e.g., PWTD or PWD) to the number of people within the benchmark population (e.g., Persons without a Targeted Disability (PWOTD) or Persons without a Disability (PWOD)). This is used because there is no Civilian Labor Force (CLF) category for PWD/PWTD. In other words, EEOC instructs us to compare (1) the ratio of the number of PWD (or PWTD) who got a particular type of award vs. the total number of PWD (or PWTD) eligible for that award with (2) the ratio of the number of PWOD (or PWOTD) who got a particular type of award vs. the total number of PWOD (or PWOTD) eligible for that award. We compare the IR for the Target Population with the IR for the Benchmark Population. The below analysis of the Bureau’s award program is limited to spot awards, superior achievement awards, team achievement awards and the Director’s Mission Achievement awards and is separate from the Bureau’s compensation program where employees receive lump sum payments and merit increases based



on their performance rating. All employees who receive an Accomplished Performer rating (on the pass/fail system) receive their lump sum and merit increases. For Awards, when the IR percentage for the target is lower than IR percentage for the benchmark, there is a trigger. The triggers identified below are being analyzed through the Bureau’s ongoing barrier analysis work. Total Awards from \$501-\$999 given: 196 PWD Target (\$501-\$999): 17 PWD Benchmark: 161 PWOD Target (\$501-\$999): 196-17=179 PWOD Benchmark: 1429-161=1268 PWD IR 10.56% < PWOD 14.12%. This is a trigger. Total Awards from \$2000-\$2999 given: 26 PWD Target (\$2000-\$2999): 1 PWD Benchmark: 161 PWOD Target (\$2000-\$2999): 26-1=25 PWOD Benchmark: 1429-161=1268 PWOD IR 0.62% < PWOD 1.97%. This is a trigger. Total Awards from 21-30 hours given: 11 PWD Target (21-30 hours): 1 PWD Benchmark: 161 PWOD Target (21-30 hours): 11-1=10 PWOD Benchmark: 1429-161=1268 PWD IR 0.62% < PWOD 0.79%. This is a trigger. ----- Total Awards from \$501-\$999 given: 196 PWTD Target (\$501-\$999): 4 PWTD Benchmark: 44 PWOTD Target (\$501-\$999): 196-4=192 PWOTD Benchmark: 1429-44=1385 PWTD IR 9.09% < PWOTD 13.86%. This is not a trigger. Total Awards from \$2000-\$2999 given: 26 PWTD Target (\$2000-\$2999): 0 PWTD Benchmark: 44 PWOTD Target (\$2000-\$2999): 26-0=26 PWOTD Benchmark: 1429-44=1385 PWTD IR 0.00% < PWOTD 1.88%. This is a trigger. Total Awards from 21-30 hours given: 14 PWTD Target (21-30 hours): 3 PWTD Benchmark: 44 PWOTD Target (21-30 hours): 14-3=11 PWOTD Benchmark: 1429-44=1385 PWOTD IR 6.82% < PWOTD 7.94%. This is a trigger. There were no awards in the groupings of \$3000-\$3999, \$4000-\$4999 or \$5000 or more. There were no time off awards in the 41 or more hours category.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	92	9.94	6.03	9.09	10.26
Time-Off Awards 1 - 10 Hours: Total Hours	736	79.50	48.26	72.73	82.05
Time-Off Awards 1 - 10 Hours: Average Hours	8	4.97	0.66	18.18	0.00
Time-Off Awards 11 - 20 hours: Awards Given	80	9.94	5.21	6.82	11.11
Time-Off Awards 11 - 20 Hours: Total Hours	1280	159.01	83.31	109.09	177.78
Time-Off Awards 11 - 20 Hours: Average Hours	16	9.94	1.32	36.36	0.00
Time-Off Awards 21 - 30 hours: Awards Given	11	0.62	0.74	0.00	0.85
Time-Off Awards 21 - 30 Hours: Total Hours	264	14.91	17.85	0.00	20.51
Time-Off Awards 21 - 30 Hours: Average Hours	24	14.91	1.98	0.00	20.51
Time-Off Awards 31 - 40 hours: Awards Given	14	2.48	0.83	6.82	0.85
Time-Off Awards 31 - 40 Hours: Total Hours	496	94.41	28.43	272.73	27.35
Time-Off Awards 31 - 40 Hours: Average Hours	35.43	23.60	2.84	90.91	-1.71
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	196	10.56	14.46	9.09	11.11
Cash Awards: \$501 - \$999: Total Amount	148649	7726.71	10988.10	6818.18	8068.38

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Average Amount	758.41	454.51	62.79	1704.55	-15.59
Cash Awards: \$1000 - \$1999: Awards Given	195	14.29	13.80	20.45	11.97
Cash Awards: \$1000 - \$1999: Total Amount	246999	18913.66	17384.13	26704.55	15983.76
Cash Awards: \$1000 - \$1999: Average Amount	1266.66	822.34	104.10	2967.18	15.73
Cash Awards: \$2000 - \$2999: Awards Given	26	0.62	2.07	0.00	0.85
Cash Awards: \$2000 - \$2999: Total Amount	55225	1242.24	4398.76	0.00	1709.40
Cash Awards: \$2000 - \$2999: Average Amount	2124.04	1242.24	175.95	0.00	1709.40
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Answer No
- b. Pay Increases (PWTD) Answer No

N/A. Due to the CFPB pay system which does not contain “steps” there are no “step increases.”

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

N/A. The Bureau does have a program allowing for colleagues and supervisors to recognize individuals for work-related accomplishments (e.g., through certificates of appreciation). However, data are not collected on the demographics of these forms of employee recognition.

**D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer Yes

CN-71 (GS-15 equivalent): There is a trigger for qualified internal selections. The qualified internal selections who are PWD (0.00%) are lower than the qualified applicant pool who are PWD (33.33%). There were only 3 internal selections in total. CN-60 (GS-14 equivalent): There is a trigger for qualified internal selections. The qualified internal selections who are PWD (0.00%) are lower than the qualified applicant pool who are PWD (14.29%). CN-53 (GS-13 equivalent): There is a trigger for qualified internal selections. The qualified internal selections who are PWD (0.00%) are lower than the qualified applicant pool who are PWD (15.38%).

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer No

- ii. Internal Selections (PWTD) Answer Yes
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer Yes
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer Yes

CN-81/82/90 (SES equivalent): There is a trigger for qualified internal applicants. The qualified internal applicants who are PWTD (0.00%) are lower than the relevant applicant pool who are PWTD (2.33%). CN-71 (GS-15 equivalent): There is a trigger for internal selections. The internal selections who are PWTD (0.00%) are lower than the qualified internal applicants who are PWTD (20.00%). CN-60 (GS-14 equivalent): There is a trigger for internal selections. The internal selections who are PWTD (0.00%) are lower than the qualified internal applicants who are PWTD (14.29%). CN-53 (GS-13 equivalent): There is a trigger for internal selections. The internal selections who are PWTD (0.00%) are lower than the qualified internal applicants who are PWTD (3.85%).

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWD) Answer Yes
- b. New Hires to GS-15 (PWD) Answer Yes
- c. New Hires to GS-14 (PWD) Answer No
- d. New Hires to GS-13 (PWD) Answer Yes

Executives (CN-81/82/90) (SES equivalent): 0.00% of new hires were PWD compared with 13.64% qualified applicants who were PWD. CN-71 (GS-15 equivalent): 0.00% of new hires were PWD compared with 13.26% qualified applicants who were PWD. CN-53 (GS-13 equivalent): 11.11% of new hires were PWD compared with 15.06% qualified applicants who were PWD.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWTD) Answer Yes
- b. New Hires to GS-15 (PWTD) Answer Yes
- c. New Hires to GS-14 (PWTD) Answer No
- d. New Hires to GS-13 (PWTD) Answer No

Executives (CN-81/82/90) (SES equivalent): 0.00% of new hires were PWTD compared with 5.45% qualified applicants who were PWTD. CN-71 (GS-15 equivalent): 0.00% of new hires were PWTD compared with 6.04% qualified applicants who were PWTD.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified

applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

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

b. Managers

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

c. Supervisors

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

Executives: There is a trigger for qualified internal applicants. The qualified internal applicants who are PWD (0.00%) are lower than the relevant applicant pool who are PWD (9.30%). Managers: There is a trigger for internal selections. The internal selections who are PWD (0.00%) are lower than the qualified internal applicants who are PWD (21.05%).

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

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

b. Managers

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

c. Supervisors

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

Executives: There is a trigger for qualified internal applicants. The qualified internal applicants who are PWTD (0.00%) are lower than the relevant applicant pool who are PWD (2.33%). Managers: There is a trigger for internal selections. The internal selections who are PWTD (0.00%) are lower than the qualified internal applicants who are PWTD (10.53%).

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWD) Answer Yes
- b. New Hires for Managers (PWD) Answer Yes

c. New Hires for Supervisors (PWD) Answer No

Executives: 0.00% of new hires were PWD compared with 13.64% qualified applicants who were PWD. There were only 4 external selections in total. Managers: 9.09% of new hires were PWD compared with 12.45% qualified applicants who were PWD.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWTD) Answer Yes

b. New Hires for Managers (PWTD) Answer No

c. New Hires for Supervisors (PWTD) Answer No

Executives: 0.00% of new hires were PWTD compared with 5.45% qualified applicants who were PWTD. There were only 4 external selections in total.

## Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer Yes

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer No

Using the inclusion rate, triggers exist for PWD (8.07%) who voluntarily separated from the agency, as compared to the rate of persons without disabilities (5.28%).

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	21	2.35	1.28
Permanent Workforce: Retirement	30	2.94	1.88
Permanent Workforce: Other Separations	29	2.35	1.88
Permanent Workforce: Total Separations	80	7.65	5.03

3.

Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWTD) Answer Yes

b. Involuntary Separations (PWTD) Answer No

Using the inclusion rate, triggers exist for PWTD (6.82%) who voluntarily separated from the agency, as compared to the rate of persons without disabilities (5.56%).

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	21	4.35	1.30
Permanent Workforce: Retirement	30	2.17	1.99
Permanent Workforce: Other Separations	29	0.00	1.99
Permanent Workforce: Total Separations	80	6.52	5.28

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

For FY 2020, eleven out of 49 individuals identified as a person with a disability in the exit survey data. In reviewing the data, PWD indicated their experience at the Bureau compared to what they initially expected was worse or much worse than expected (54.5%). PWD indicated they were either dissatisfied or very dissatisfied with their job at the time of exit (63.6%). When combining responses for somewhat important and very important as being a factor for leaving the Bureau, below are how PWD responded compared with persons who did not identify as having a disability (PWOD). The top responses hit on various themes to include topics on diversity and inclusion, limited training/development/advancement, and underutilization or lack of clarity within job role. • My job lacked clarity in roles and responsibilities. (81.8% PWD versus 32.4% PWOD) • The CFPB had limited opportunities for advancement. (81.8% PWD versus 73.7% PWOD) • Others' lack of holding themselves accountable for their own behavior. (81.8% PWD versus 26.3% PWOD) • Lack of ability to manage or lead effectively. (72.7% PWD versus 42.1% • My job lacked the opportunity to participate in decision-making. (72.7% PWD versus 31.6% PWOD) • There were limited opportunities for general professional development or general core competency training. (72.7% PWD versus 29.0% PWOD) • Arbitrary action or personal favoritism. (72.7% PWD versus 29.0% PWOD) • Lack of clear accountability for achieving results. (72.7% PWD versus 29.0% PWOD) • My job did not make good use of my skills and abilities. (72.7% PWD versus 50.0% PWOD) • Discrimination based on race, ethnic origin, gender, age, disability, or other factors. (72.7% PWD versus 21.6% PWOD) The exit survey comments from PWD indicated no issues with the reasonable accommodations processes or practices.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

<https://www.consumerfinance.gov/accessibility/> <https://www.consumerfinance.gov/accessibility/file-accessibility-complaint/>

2. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://www.consumerfinance.gov/accessibility/> <https://www.consumerfinance.gov/accessibility/file-accessibility-complaint/>

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

In FY 2020, the Bureau's DCPM led working group efforts to partner with Bureau Administrative Operations, Facilities, and Technology & Innovation (T&I) offices to ensure that accessibility to Bureau facilities and technology are considered in Bureau services and the procurement of supplies and services. Contact information for accessibility inquiries remain on the Bureau's external website. With the increase in virtual meetings due to mandatory and maximum telework requirements under COVID-19 safety precautions, the Bureau increased its closed captioning budget within T&I to ensure that Bureau-wide meetings and events have appropriate funding. During FY 2020, the DCPM and the 508 Program manager developed a thorough 508 program workplan that outlined metrics and milestones to create Bureau-wide 508 program policies and procedures that would improve the accessibility of technology for PWD and PWTD. While the CFPB was on mandatory and/or maximum telework for the majority of FY 2020 and continuing into FY 2021, all Bureau buildings and facilities remained compliant under the Architecture Barriers Act, maintaining equal access to buildings for PWD and PWTD.

### C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

During FY 2020, the Reasonable Accommodation program processed 66 reasonable accommodation cases, with an average processing time of 13 calendar days (measured beginning with the date the relevant request was received until the time a decision on the accommodation was communicated). CFPB's current reasonable accommodation SOP generally requires accommodations to be provide in no more than 30 days, absent extenuating circumstances (which are strictly defined in the SOP). Where extenuating circumstances exist, the Bureau will investigate whether there are temporary measures that can be taken to assist the requestor and provide temporary measures where feasible.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The Bureau remains committed to providing reasonable accommodations services to all employees and applicants for Bureau employment. Reasonable accommodations are centrally funded with a sufficient dedicated budget and employee resources. Reasonable Accommodations and Personal Assistance Services policies and procedures, approved by the EEOC on August 23, 2019, ensure that applicants and employees know their rights under the Rehabilitation Act to receive a reasonable accommodation for disability-related limitations if needed to apply for a Bureau job, perform the essential functions of a job, or enjoy equal benefits and privileges of employment at the Bureau. The Bureau's policy also explains management's responsibilities when a supervisor or manager is put on notice that an employee requires a reasonable accommodation. The accompanying SOP lays out the interactive process used when an employee requests a reasonable accommodation for a disability. In FY 2020, both the DCPM and the OCR Director the Reasonable Accommodations team continued to report to the OEOF Associate Director. However, to avoid the appearance or actual conflict of interest and under OEOF firewall, the OEOF Associate Director takes no part in any decisions pertaining to the providing of reasonable accommodations raising allegations of violations of the Rehabilitation Act. The Reasonable Accommodation/PAS program also receive legal support from the Legal Division's Office of General Law and Ethics to ensure that the Reasonable Accommodation/PAS program is complying with all legal obligations; support from the Bureau's Section 508 Program Manager on technology issues; technical assistance from OCR staff as needed and appropriate; support from the Department of Treasury's Bureau of the Fiscal Service (BFS) for applicants seeking reasonable accommodations; and contractor medical professional advice when needed. In FY 2020, the Bureau disseminated and trained appropriate staff on policy and procedures (and forms) and posted them on [www.consumerfinance.gov](https://www.consumerfinance.gov), as required under the affirmative action regulations. The most updated, finalized policy and procedures are available at <https://www.consumerfinance.gov/office-civil-rights/reasonable-accommodation-persons-disabilities/>. The same policy and procedures are available on the Wiki (Bureau's intranet) for all



employees. During FY 2020, the Bureau also conducted general training on the Rehabilitation Act and reasonable accommodations during regional, division, and office meetings to ensure that managers and employees understand the Rehabilitation Act and their role in the reasonable accommodation process and to learn how to respond appropriately when an individual request a reasonable accommodation. The Bureau utilizes the Entellitrak system, the Bureau’s electronic database for reasonable accommodations, to track reasonable accommodations data. In FY 2020, the Bureau implemented enhanced tracking updates for reasonable accommodations to the Entellitrak system. Some of those enhancements include case load assignment to reasonable accommodations resources, interactive ticklers with reminders for the RA team and the ability to see if a case is approaching the agency’s service level agreement. Some highlights from the Reasonable Accommodation Entellitrak reporting for FY 2020 are as follows: Of the 66 RA cases processed in FY 2020 (average processing time of 13 days), the Bureau had 65 cases in which the accommodation was granted (including three cases in which the requestor was provided alternate accommodations) and one case where the request for accommodation was denied for failure to provide additional documentation to support the request. As of early FY 2021, of the requests made in FY 2020, one request is still “open”. In providing ergonomic equipment and assistive technology accommodations requested in FY 2020, the Bureau spent approximately \$7,395.49 from its centralized reasonable accommodations budget, averaging \$113.78 per case across these types of accommodations granted, and averaging \$568.88 per case for each request that required an expenditure. The Bureau also spent \$62,000.00 for American Sign Language Interpretation accommodations and accessibility services, and \$94,000.00 for Sprint closed captioning accommodations and services in FY 2020.

**D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

*Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.*

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The Bureau has an updated and EEOC approved Reasonable Accommodation Policy and SOP to include procedures for implementing the PAS requirement. The PAS SOP provides that the process for requesting PAS, the Bureau’s process for determining whether such services are required, and the Bureau’s determination to deny PAS requests when it would pose an undue hardship, are the same processes as for reasonable accommodation. The Bureau still has had no requests for PAS to date. The Bureau has a contract in place in the event that an employee requests PAS services. CFPB will review and analyze the effectiveness of the revised policy and SOP as appropriate.

**Section VII: EEO Complaint and Findings Data**

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?  

Answer Yes
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?  

Answer Yes
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

NA – there were no findings of discrimination during the last fiscal year. According to the EEOC’s benchmark, 20.82% of all formal EEO complaints filed government-wide included an allegation of (non-sexual) harassment based on either a mental or physical disability. According to CFPB Form 462 data for FY 2020, 4 out of the 18 formal complaints filed with CFPB’s Office of

Civil Rights under 29 C.F.R. Part 1614 (not including complaints filed alleging violations of Executive Order 11478) alleged disability-based (non-sexual) harassment. Thus, the CFPB percentage of such complaints is 22.22% (4/18) -- above the government-wide benchmark of 20.82%. There were no findings of discrimination, but there were two settlement agreements in cases that included allegations of harassment based on disability.

**B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

- 1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer Yes

- 2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer Yes

- 3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

According to the EEOC's benchmark, 13.53% of all formal EEO complaints filed government-wide included an allegation of failure to accommodate based on either a mental or physical disability. According to CFPB Form 462 data for FY 2019, 3 out of the 15 formal complaints filed with CFPB's Office of Civil Rights under 29 C.F.R. Part 1614 (not including complaints filed alleging violations of Executive Order 11478) alleged failure to accommodate either a mental or physical disability. Thus, the CFPB percentage of such complaints is 20.00% (3/15) -- above the government-wide benchmark of 13.53%. The Bureau had no findings of discrimination of any kind in FY 2019. However, the Bureau settled 2 matters alleging (at least in part) a failure to provide a disability reasonable accommodation.

**Section VIII: Identification and Removal of Barriers**

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

- 1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

- 2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

- 3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

- 4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

In FY 2020, the Bureau continued its comprehensive Barrier Analysis (BA) study regarding disability employment-related efforts (conducted by the independent external vendor ICF, Inc.). The BA study focused on identifying any possible triggers and ultimately any barriers to equal employment opportunities, within the Bureau's hiring processes, targeted recruitment and outreach efforts, retention efforts, or the education of managers and employees on the benefits of employing persons with disabilities (PWD) and persons with targeted disabilities (PWTD). While triggers have been identified in this FY 2020 AAP, the barrier analysis investigation was still ongoing at the end of FY 2020, and thus, no barriers were identified in FY 2020.

5.

For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

N/A

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

N/A