

Equal Employment Opportunity (EEO) program status report

Fiscal Year (FY) 2025

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Overview

This Equal Employment Opportunity (EEO) Program Status Report for Fiscal Year (FY) 2025¹ is prepared and submitted under Section 717 of the Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-16, Section 501 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 791, the U.S. Equal Employment Opportunity Commission’s (EEOC) regulations at 29 CFR Part 1614, and the EEOC’s Management Directive 715 (MD-715) and accompanying instructions and guidance (as updated).²

EEOC’s MD-715 requires Federal agencies to conduct a self-assessment on at least an annual basis to evaluate the effectiveness of their overall Equal Employment Opportunity program, using EEOC-prescribed compliance indicators and measures.

This report reflects the results of the Consumer Financial Protection Bureau (CFPB) MD-715 self-assessment for FY 2025.

¹ October 1, 2024 through September 30, 2025.

² See EEOC Management Directive 715 (Oct. 1, 2003) (MD-715), available at <https://www.eeoc.gov/federal/directives/md715.cfm>; Instructions to Federal Agencies for EEO MD-715 (MD-715 Instructions), available at <https://www.eeoc.gov/federal/directives/md715/index.cfm>. Per EEOC’s federal-sector regulations at 29 C.F.R. Part 1614, MD-715 is binding on all Executive agencies (including CFPB). See 29 C.F.R. § 1614.103(b)(2) (“This part applies to . . . Executive agencies as defined in 5 U.S.C. 105”); see also 29 C.F.R. § 1614.102(e) (“Agency [EEO] programs shall comply with this part and the Management Directives and Bulletins that the Commission issues.”) (emphasis added).

Part A – CFPB’s identifying information

Agency identifying information

Agency identifying information	
1. Agency	Consumer Financial Protection Bureau (CFPB)
2. Address	1700 G Street, NW
3. City, State, Zip code	Washington, D.C. 20552
4. Agency code	FRFT
5. FIPS codes	11001, 06075, 17031, 36061, 13121

Part B – Total employment

At the end of FY 2025,³ the workforce encompassed 1,366 total employees. This included 1,323 employees on permanent appointments and 43 employees on temporary appointments.

³ Data as of September 30, 2025. Workforce numbers for FY 2024 included in this FY 2025 EEO Program Status Report may differ slightly from corresponding data reported in the FY 2024 EEO Program Status 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 2024 EEO Program Status Report.

Part C – Leadership

CFPB Leadership

CFPB Leadership

Head of Agency	Russell Vought Acting Director Consumer Financial Protection Bureau
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Agency Head Designee	Melissa S. Brand Director Office of Civil Rights Consumer Financial Protection Bureau
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Part D – List of subordinate components and mandatory documents

The CFPB’s report includes employees located in four regions – Midwest, Northeast, Southeast, and West.⁴ The relevant FIPS codes are listed in Part A.

All mandatory documents are uploaded to the Equal Employment Opportunity Commission’s (EEOC’s) online portal called FedSEP. These include the CFPB’s Strategic Plan FY 2022-FY 2026,⁵ the CFPB’s organizational chart,⁶ the FY 2025 EEO and Anti-Harassment/Anti-Bullying Policy Statement,⁷ Anti-Harassment/Anti-Bullying Policy and Related Procedures, Disability Reasonable Accommodation and Personal Assistance Services Policy,⁸ and the Alternative Dispute Resolution Policy and Procedures.

⁴ The states that comprise each region can be found here: <https://www.consumerfinance.gov/about-us/the-bureau/bureau-structure/supervision-regional-directors/>. The CFPB abolished its regional structure in FY 2026.

⁵ This five-year Agency-wide Strategic Plan is available at <https://www.consumerfinance.gov/about-us/budget-strategy/strategic-plan/>.

⁶ The CFPB’s organizational structure is available at <https://www.consumerfinance.gov/about-us/the-bureau/bureau-structure/>.

⁷ The most recent statement is available at <https://www.consumerfinance.gov/office-civil-rights/eo-policy-and-reports/>.

⁸ A copy of the policy is available at <https://www.consumerfinance.gov/office-civil-rights/reasonable-accommodation-persons-disabilities/>.

Part E.1 – Executive summary

Per MD-715 instructions for Agencies with 200 or more employees,⁹ the CFPB submits Part E.1 as required. The CFPB continues to uphold a model EEO program as outlined in Part G. Part H closes out one deficiency identified in a previous fiscal year and one item has an action plan that will continue in FY 2026.

Mission and Mission Related Functions

The Dodd-Frank Wall Street Reform and Consumer Protection Act (including the Consumer Financial Protection Act of 2010) (Dodd-Frank Act or DFA) created the CFPB to regulate the offering and provision of consumer financial products or services under the Federal consumer financial laws.¹⁰ Under the Consumer Financial Protection Act, the CFPB “shall seek to implement and, where applicable, enforce Federal consumer financial law consistently for the purpose of ensuring that all consumers have access to markets for consumer financial products and services and that markets for consumer financial products and services are fair, transparent, and competitive.”¹¹

⁹ See MD-715 Instructions, at III.E. (Reporting and Line by Line Instructions for Executive Summary).

¹⁰ See Pub. L. No. 111-203, at Title X, § 1011(a), 124 Stat. 1376, 1964 (July 21, 2010) (codified at 12 U.S.C. § 5491(a)).

¹¹ 124 Stat. 1980, § 1021(a) (codified at 12 U.S.C. § 5511(a)).

Part F – Certification of establishment of continuing EEO programs

I certify that the Agency has conducted an annual self-assessment and established plans to correct any program deficiencies.

Melissa S. Brand, Director
Office of Civil Rights

Date

Russell Vought, Acting Director
Consumer Financial Protection Bureau

Date



[Signed versions are on file with the U.S. Equal Employment Opportunity Commission.]



Part G – EEO program self-assessment checklist

The CFPB conducted the mandatory self-assessment of its EEO Program by completing MD-715 Part G, the Self-Assessment Checklist. The first two columns in the checklist with the compliance indicators and measures are templated language provided by the EEOC. This checklist and supporting documentation and data have also been submitted to the EEOC via FedSEP.



Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP



This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.


 Compliance Indicator  Measures	A.1 – The agency issues an effective, up-to-date EEO policy statement.	Measure Met? (Yes/No/NA)	Comments
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	June 18, 2025.
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]		CFPB’s EEO policy statement addresses the protected bases listed, however, consistent with Executive Order 14168, CFPB policy does not include any references to “gender identity.”


 Compliance Indicator  Measures	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
A.2.a	Does the agency disseminate the following policies and procedures to all employees:		
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:		
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]		CFPB disseminates the contact information for its EEO Counselors, EEO Officers, and EEO Director.
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	



A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	CFPB’s policy is available at https://www.consumerfinance.gov/office-civil-rights/reasonable-accommodation-persons-disabilities/ .
A.2.c	Does the agency inform its employees about the following topics:		
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	This information is provided to all employees in a variety of ways (e.g., upon hire; upon the Director’s issuance of the annual EEO and Anti-Harassment Policy Statement and No FEAR Act Notice to all employees.). This information is also available and maintained on the OCR intranet which is accessible by all employees at any time.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	This information is provided to all employees in a variety of ways at multiple points throughout each fiscal year. <i>See</i> answer to A.2.c.1.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	This information is provided to all employees in a variety of ways at multiple points throughout each fiscal year. <i>See</i> answer to A.2.c.1.

A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	This information is provided to all employees in a variety of ways at multiple points throughout each fiscal year. <i>See</i> answer to A.2.c.1.
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	This information is provided to all employees in a variety of ways at multiple points throughout each fiscal year. <i>See</i> answer to A.2.c.1.
 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	All employees are encouraged to recognize a colleague through the Superior EEO Achievement certificate program.
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the	Yes	



	perception of EEO principles within the workforce? [see 5 CFR Part 250]		
Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.			
 Compliance Indicator	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Met? (Yes/No/NA)	Comments
 Measures			
B.1.a	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	N/A	EEO Director reports to the agency head.

B.1.a.2	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If “yes”, please provide the date of the briefing in the comments column.	Yes	The OCR Director provided this briefing to senior management officials on September 19, 2025.
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 Compliance Indicator	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments

 Measures			
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for	Yes	



	improvement to the agency head? [see 29 CFR §1614.102(c)(2)]		
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A	The CFPB does not have subcomponents.
 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
B.3.b	Does the agency’s current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If		The CFPB Strategic Plan aligns with the President’s and the Acting Director’s priorities. Although the CFPB will



	<p>“yes”, please identify the EEO principles in the strategic plan in the comments column.</p>		<p>continue to commit to the EEO, the CFPB will not reference diversity and inclusion principles in light of the Executive Order 14151, “Ending Radical and Wasteful Government DEI Programs and Preferences,” and Executive Order 14173, “Ending Illegal Discrimination and Restoring Merit-Based Opportunity.”</p>

 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes	
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation,	Yes	

	harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.		
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	N/A	The Agency does not have components or field offices.
B.4.a.6	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes	
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		CFPB declines to respond to this question for the reasons noted in its cover letter.
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement	Yes	



	Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]		
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	



 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes	
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes	
B.5.a.5	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes	

 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]		CFPB declines to respond to this question for the reasons noted in its cover letter.
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]		CFPB declines to respond to this question for the reasons noted in its cover letter.
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]		CFPB declines to respond to this question for the reasons noted in its cover letter.
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes	

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY



This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency’s EEO Program and Plan.

 Compliance Indicator  Measures	C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (Yes/No/NA)	Comments
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	The CFPB does not have components or field offices.
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	The CFPB does not have components or field offices.

C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	The CFPB does not have components or field offices.
 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC’s enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	



C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comments column.	No	This is covered by an existing Part H action plan.
C.2.a.6	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	

C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes	
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the	Yes	



	percentage of timely-processed requests in the comments column.		
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	Yes	The procedures are posted at https://www.consumerfinance.gov/office-civil-rights/reasonable-accommodation-persons-disabilities/ .
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal	Yes	



	that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?		
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes	
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	



C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes	
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes	
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	



 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]		CFPB declines to respond to this question for the reasons noted in its cover letter.
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate	Yes	

	assessment surveys, and grievance data), upon request? [see MD-715, II(C)]		
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	



 Compliance Indicator  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	None administered during the reporting period.
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes	



 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.		CFPB provides regular EEO updates concerning these matters except for barrier analysis plans and special emphasis programs.
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	
<p style="text-align: center;">Essential Element D: PROACTIVE PREVENTION</p> <p style="text-align: center;">This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</p>			

 Compliance Indicator  Measures	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]		CFPB declines to respond to this question for the reasons noted in its cover letter.
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]		CFPB declines to respond to this question for the reasons noted in its cover letter.
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]		CFPB conducts exit interviews or surveys related to these issues excluding diversity and inclusion matters.

 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]		From October 2024 to April 2025, OCR had a process in place.
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment		CFPB declines to respond to this question for the reasons noted in its cover letter.



	<p>program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.</p>		

 Compliance Indicator  Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]		CFPB declines to respond to this question for the reasons noted in its cover letter.



 Compliance Indicator  Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	


Essential Element E: EFFICIENCY


This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.



 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
 Measures			
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes	
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch.	Yes	Of the formal complaints that were filed in FY 2025 the average length of time for issuing the Accept/Dismiss communication was 14 calendar days. In FY 2025, CFPB dismissed 5 formal



	5(I)? If so, please provide the average processing time in the comments.		complaints which were pending an average of 13 calendar days before dismissal.
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes	
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes	
E.1.i	Does the agency issue final actions timely following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-	Yes	In the event that any contractor provides poor work product or causes inexcusable delays in processing times, the contract could be terminated and/or key personnel



	110, Ch. 5(V)(A)] If “yes”, please describe how in the comments column.		could be replaced. The contractors’ performance would be reported via Contractor Performance Assessment Reporting System (CPARS).
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If “yes”, please explain.	Yes	The EEO complaint program has attorneys that are separate from the agency's Legal Division.



E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	OCR staff attorneys conduct legal sufficiency reviews.
E.2.c	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	N/A	OCR staff attorneys conduct legal sufficiency reviews.
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
E.2.e	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	N/A	OCR staff attorneys conduct legal sufficiency reviews.
 Compliance Indicator	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments



 Measures			
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	

 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes	
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]		CFPB declines to respond to this question for the reasons noted in its cover letter.
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	

E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	No	The Anti-Harassment Program is working to ensure that all past and present cases are fully and accurately captured in the system. The FY 2023 Part H action plan is continued in this report.
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	CFPB regularly monitors trends in its EEO program to determine whether the CFPB is meeting its obligations under the workplace anti-discrimination laws.

E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.	Yes	During FY 2025, EEO Directors met quarterly from the various FIRREA agencies to share best practices.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
 Compliance Indicator	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments
 Measures			
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	

F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	
 Compliance Indicator	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments
 Measures			
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	

F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes	
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes	
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments

F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes	
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes	<i>See</i> https://www.consumerfinance.gov/office-civil-rights/no-fear-act-cummings-act/

Part H – EEO plan to attain the essential elements of a model EEO program

H.1. Action Plan – Data Accuracy

FY 2025 EEOC MD-715 Report part H-1

EEOC Form 715-01 Part H-1 U.S. Equal Employment Opportunity Commission
Federal Agency Annual EEO Program Status Report (FY 2025)

Statement of Model Program Essential Element Deficiency:

Type of Program Deficiency	Part G – C.4.c.
Brief Description of Program Deficiency	A data accuracy issue was identified for some FY 2023 new hires who completed their SF-181 and SF-256 forms using the USAStaffing Onboarding Module (implemented in July 2022) which impacts the workforce data tables. Data errors identified throughout FY 2024 too.

Objective(s) and Dates for EEO Plan:

Objective	100% data accuracy for new hires who submit their demographics forms (e.g., SF-181 and/or SF-256 forms)
Date Initiated (mm/dd/yyyy)	10/24/2023
Target Date (mm/dd/yyyy)	09/30/2024
Modified Date (mm/dd/yyyy)	09/30/2025
Date Completed (mm/dd/yyyy)	09/30/2025

Responsible Official(s):

Title	Acting Chief Human Capital Officer
Name	Adam Martinez
Performance Standards Address the Plan? (Yes or No)	Yes

Planned Activities Toward Completion of Objective:

Target Date (mm/dd/yyyy)	09/30/2025
Planned Activities	Minimal errors. This action plan is closed out with this report.
Sufficient Funding and Staffing (Yes or No)	Yes
Modified Date (mm/dd/yyyy)	09/30/2025
Completion Date (mm/dd/yyyy)	09/30/2025

Report of Accomplishments:

Fiscal Year	2025
Accomplishments	FY 2025 new hire records were audited and minimal data errors were identified. This action plan is closed out with this report.

H.2. Action Plan – Anti-Harassment Data

FY 2025 EEOC MD-715 Report part H-2

EEOC Form 715-01 Part H-2 U.S. Equal Employment Opportunity Commission
Federal Agency Annual EEO Program Status Report (FY 2025)

Statement of Model Program Essential Element Deficiency:

Type of Program Deficiency	Part G – E.4.a.6 and C.2.a.5
Brief Description of Program Deficiency	Data integrity is not consistent in the case management tool to ensure complaints for the anti-harassment/anti-bullying program are accurately collected and monitored in order to be analyzed, to include validating that the agency is conducting a prompt inquiry (beginning within 10 days of notification) of all harassment allegations.

Objective(s) and Dates for EEO Plan:

Objective	Consistent and timely data for anti-harassment program complaints.
Date Initiated (mm/dd/yyyy)	10/01/2023
Target Date (mm/dd/yyyy)	09/30/2024
Modified Date (mm/dd/yyyy)	09/30/2026
Date Completed (mm/dd/yyyy)	Not yet completed.

Responsible Official(s):

Title	Acting Chief Human Capital Officer Office of Human Capital, Employee Relations Director
Name	Adam Martinez Liza Strong
Performance Standards Address the Plan? (Yes or No)	Yes

Planned Activities Toward Completion of Objective:

Target Date (mm/dd/yyyy)	09/30/2025
Planned Activities	<ul style="list-style-type: none"> CFPB’s Office of Human Capital (OHC) will audit Anti-Harassment/Anti-Bullying (AHAB) cases to ensure all complaints are received and documented in the case management tool. Allegations that rise to the level of harassment/bullying will be documented and an

investigative summary will be forwarded to the deciding official and documented in the case management tool. All cases will be completed in a timely manner. For those cases that are determined not rise to the level of harassment/bullying, a close out memo, which includes why it wasn't investigated and specific actions taken to make this determination will be entered into the case management tool.

- OHC will ensure the data is collected and recorded accurately in order to calculate and provide the number of days from notification, including those initially raised in the EEO Program, to inquiry in accordance with EEOC guidance and case law. OHC will provide the case level data and the percentage of timely processed inquiries to OCR for this annual report.
- OHC will utilize the outcome field to provide consistent and complete information about whether an investigation was conducted, why one was or wasn't conducted and how the result of the case was determined. OHC will ensure this field and other relevant fields are accurately and fully filled out for past, present and future cases.
- OHC will ensure the type of Harassment field is completed to indicate if harassment, bullying and/or specific protected bases were alleged.
- OHC will ensure all available and accessible comprehensive anti-harassment program data is entered into the required fields in case management tool, including the bases (or "other" if no bases), issues, individual alleging harassment/bullying, and the individual alleged to have conducted harassment/bullying.
- OHC will continue to use the case management job aid to ensure consistency amongst Specialists.
- OHC will update the case management job aid as needed to ensure all data elements are included.
- OHC will develop reports to regularly monitor data for accuracy, completeness, and timely entry.
- OHC will work to ensure the case management system captures all characters within respective fields and is exportable for reporting.

Sufficient Funding and Staffing (Yes or No)

Yes

Modified Date (mm/dd/yyyy)

09/30/2026

Completion Date (mm/dd/yyyy)

Not yet completed.

Report of Accomplishments:

Fiscal Year

2025

Accomplishments

- ✓ OHC continued working with the OHC-Systems team on a SharePoint solution for case tracking, reporting and monitoring.
 - ✓ OHC continued reviewing and updating historical cases as needed.
 - ✓ OHC finalized the standard operating procedure (SOP) in coordination with Legal Division. OHC plans to continue updating the SOP as the team transitions to the new tracking platform.
-

Part I – EEO plan to eliminate identified barriers

CFPB has ceased barrier analysis work consistent with Executive Order 14281, *Restoring Equality of Opportunity and Meritocracy*.

Part J – Special program plan for the recruitment, hiring, advancement, and retention of persons with disabilities

CFPB’s related Affirmative Action Plan for applicants and employees with disabilities will be available on www.consumerfinance.gov at <https://www.consumerfinance.gov/office-civil-rights/eo-policy-and-reports/>.

FY 2025 EEO and anti-harassment policy statement

CFPB's latest version is available here, <https://www.consumerfinance.gov/office-civil-rights/eo-policy-and-reports/>.

FY 2025 Notice on the No FEAR Act and whistleblower protection laws/prohibited personnel practices

CFPB's latest version is available here, <https://www.consumerfinance.gov/office-civil-rights/whistleblowers/>.