

No FEAR Act Report for fiscal year (FY) 2025

Pursuant to Notification and Federal Employee Antidiscrimination
and Retaliation Act of 2002

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1. Purpose of Report

The Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 – the “No FEAR Act” – requires each agency to submit an annual report to Congress, the Chair of the Equal Employment Opportunity Commission (EEOC), and the Attorney General of the United States.¹ Regulations from the Office of Personnel Management (OPM) implementing the No FEAR Act also require the submission of this annual report to the Director of OPM.²

The annual report must provide the following information:

- The number of federal court cases, pending or resolved, arising under the No FEAR Act laws and the status and disposition of the cases;
- Judgment Fund reimbursements and adjustments to agency budgets to meet reimbursement requirements;
- The number and type of disciplinary actions related to discrimination, retaliation, or harassment and the agency’s policy relating to appropriate disciplinary action;
- Year-end summary data related to federal-sector EEO complaint activity;
- An analysis of trends, causation, and practical knowledge gained through experience, and actions planned or taken to improve complaint or civil rights programs; and
- The agency’s plan for No FEAR Act-related training.³

The Consumer Financial Protection Bureau (CFPB) prepares and submits this report to comply with these statutory and regulatory requirements.

The CFPB’s No FEAR Act data – including No FEAR Act annual reports, the CFPB’s most recent No FEAR Act Notice, and quarterly data – can be accessed from the homepage of the CFPB’s website (www.consumerfinance.gov), or directly at <https://www.consumerfinance.gov/office-civil-rights/no-fear-act-cummings-act/>.

¹ Pub. L. No. 107-174, § 203(a).

² 5 C.F.R. § 724.302(e)(8).

³ See Pub. L. No. 107-174, § 203(a)(1); see also 5 C.F.R. § 724.302(a). Appendix A to this report sets forth these requirements in full.

2. Background

2.1 The CFPB Mission

Congress established the CFPB which was created by the Dodd-Frank Wall Street Reform and Consumer Protection Act to provide a single point of accountability for enforcing federal consumer financial laws and protecting consumers in the financial marketplace. The CFPB's focus is to ensure that all consumers have access to markets for consumer financial products and services that are fair, transparent, and competitive.

2.2 The CFPB EEO Program

The Office of Civil Rights (OCR) carries out statutory functions required by Section 717 of Title VII of the Civil Rights Act of 1964 (and related EEO laws) and the EEOC's federal-sector regulations at 29 C.F.R. Part 1614 (Part 1614),⁴ as well as EEOC Management Directives 110 (MD-110) and MD-715.⁵ The OCR Director reports to the CFPB Director.⁶ OCR, as the CFPB's EEO office, safeguards employment-related civil rights throughout the agency.

⁴ See generally 42 U.S.C. § 2000e-16; Exec. Order No. 11478, 34 Fed. Reg. 12985 (Aug. 8, 1969), as amended; see also 29 C.F.R. Part 1614.

⁵ See EEOC Management Directive 110 for 29 C.F.R. Part 1614 (Aug. 5, 2015) (MD-110), available at <https://www.eeoc.gov/federal/directives/md110.cfm>.

⁶ OCR is led by the OCR Director who reports to the CFPB Director per 29 C.F.R. § 1614.102(b)(4) and the Elijah E. Cummings Federal Employee Antidiscrimination Act of 2020, Public Law 116-283.

3. Data and Analysis

The information in this section meets the reporting requirements of the No FEAR Act and its implementing regulations. The information presented includes:

- Subsection 3.1 – EEO Complaint Activity in Federal Court and Status/Disposition
- Subsection 3.2 – Judgment Fund Reimbursements and Budget Adjustments
- Subsection 3.3 – Discipline-Related Policies and Number of Employees Disciplined
- Subsection 3.4 – Analysis of Complaints
- Subsection 3.5 – No FEAR Act Training

3.1 EEO complaint activity in federal court and status/disposition

During FY 2025, the CFPB had one civil action pending in the federal court(s) related to one or more of the civil rights laws covered by the No Fear Act.⁷ The case involved alleged violations of Title VII and the Equal Pay Act. At the end of FY 2025, this case was still pending with the D.C. District Court. There have been no civil actions in which discrimination have been found.

3.2 Judgment fund reimbursements and budget adjustments

In FY 2025, the CFPB neither made reimbursements to the Judgment Fund nor needed to adjust its budget to comply with No FEAR Act reimbursement requirements.⁸

3.3 Discipline-related policies and number of employees disciplined

The CFPB's Equal Employment Opportunity & Non-Discrimination Policy⁹ informs CFPB employees of their rights and obligations relating to civil rights and anti-discrimination laws. It provides that any employee who engages in conduct found to violate applicable civil rights or anti-discrimination laws, or related Bureau policies, will be held accountable for such violations.

⁷ 5 C.F.R. 724.102.

⁸ See Pub. L. No. 111-203, § 1017.

⁹ [CFPB Equal Employment Opportunity & Non-Discrimination Policy](#).

Employees found to have committed such violations are subject to disciplinary action up to and including removal from federal service. The CFPB has a Disciplinary and Adverse Action Policy and a Policy and Procedures for Addressing Misconduct that are available on the intranet for all supervisors and employees.

Policy Prohibiting Harassment and Bullying

The CFPB's *Policy Prohibiting Harassment and Bullying* (and related enforcement procedures) are generally modeled on the EEOC's own policy/procedures and meet all the criteria established in EEOC's federal-sector anti-harassment enforcement guidance.¹⁰

EEO complaints

In addition, the CFPB's Part 1614 complaints process (administered by OCR), safeguards employee civil rights and provides appropriate relief for statutory violations.¹¹ In FY 2025, OCR did not issue any findings of discrimination. When there is a finding of discrimination, OCR encourages the CFPB's officials to impose the maximum discipline supportable under the law and facts as relevant under the circumstances.¹² Where conduct was found to be inappropriate but not unlawful, the OCR Director may recommend particular improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities through an After Action memorandum. When there is a finding of discrimination, OCR also submits a disciplinary action report to the EEOC, which is required by the Elijah E. Cummings Act. In FY 2025, there was no management initiated formal disciplinary action for any employees as defined in 5 C.F.R. § 724.10213 in connection with cases pending or resolved in U.S. district court or for violating the CFPB's policies related to conduct that is inconsistent with whistleblower protection laws.¹⁴

¹⁰ See EEOC Guidance, *Model EEO Programs Must Have an Effective Anti-Harassment Program*, available at https://www.eeoc.gov/federal/model_eeo_programs.cfm.

¹¹ When OCR finds discrimination has occurred, OCR coordinates with the OMWI Director regarding the design and implementation of any remedies resulting from violations of civil rights statutes, regulations, or Executive orders (as required by the Dodd-Frank Act). See 12 U.S.C. § 5452(a)(3).

¹² See 29 C.F.R. § 1614.102(a)(6) (providing that, in supporting its EEO program, agencies shall "[t]ake appropriate disciplinary action against employees who engage in discriminatory practices").

¹³ Under 5 C.F.R. § 724.102, "discipline" means any one or a combination of the following actions: reprimand, suspension without pay, reduction in grade or pay, or removal. Counseling is not a form of discipline.

¹⁴ See 5 C.F.R. §§ 724.302(a)(5), (a)(6).

3.4 Analysis of complaints

Under the No FEAR Act, agencies in their annual reports must analyze certain complaint-related data, providing: (1) an examination of trends; (2) causal analysis; (3) practical knowledge gained through experience; and (4) any actions planned or taken to improve complaint or civil rights programs of the agency with the goal of eliminating discrimination and retaliation in the workplace.¹⁵ This analysis is provided below.

Trends and causal analysis

Pending complaints

At the end of FY 2025, the CFPB had six formal EEO complaints from five complainants pending with the EEOC in hearing or appeal from a previous fiscal year, which is lower than three of the past five years back to FY 2020. At the end of FY 2025, there were three formal EEO complaints filed in previous fiscal years (FY 2023 or prior) remaining in the investigation phase and zero in the election phase for a complainant to choose either a FAD or EEOC hearing. As of the end of FY 2025, there were zero formal EEO complaints pending in the Final Agency Action phase. One complaint¹⁶ was pending at the EEOC hearing phase, compared to two¹⁷ in FY 2024 and two¹⁸ in FY 2023. One complaint was pending at the EEOC appeal phase, compared to two¹⁹ in FY 2024 and five²⁰ in FY 2023.²¹

Figure 1 and Figure 2 present this data and related data for five previous fiscal years.

¹⁵ See Pub. L. No. 107-174, Section 203(a)(7); see also 5 C.F.R. § 724.302(a)(7).

¹⁶ This total does not include one case pending MSPB proceedings and is now being held in abeyance.

¹⁷ This total does not include one case pending MSPB proceedings and is now being held in abeyance.

¹⁸ This total does not include one case that was at Hearing but has been remanded because it is pending district court class action, and one pending MSPB proceedings and are now being held in abeyance. However, this total includes two cases filed by the same filer, bifurcated by the U.S. Equal Employment Opportunity Commission (EEOC).

¹⁹ This total includes one case that is pending Request for Reconsideration (RFR) from the EEOC.

²⁰ This total includes four cases that are pending Request for Reconsideration from the EEOC.

²¹ Hearings and appeal stages of the Part 1614 EEO complaint process are managed by the EEOC and not within the control of OCR. If a complainant requests an EEOC hearing the matter becomes adversarial and the CFPB's Legal Division represents the CFPB as a party in the proceeding, including on any administrative appeal filed with EEOC's Office of Federal Operations.

FIGURE 1: PENDING COMPLAINTS AND INDIVIDUALS FILING COMPLAINTS FY 2020 – FY 2025

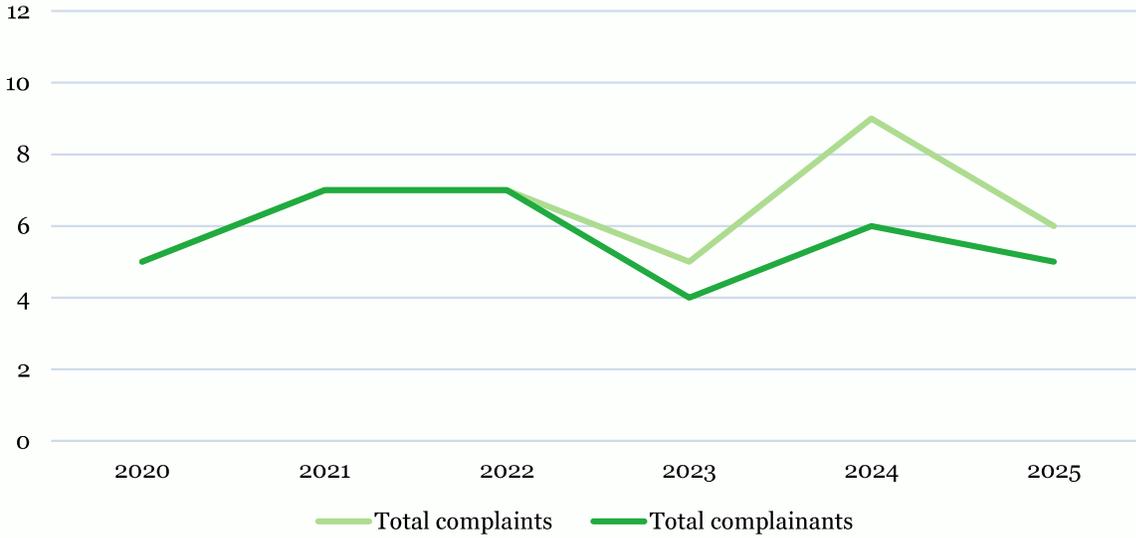
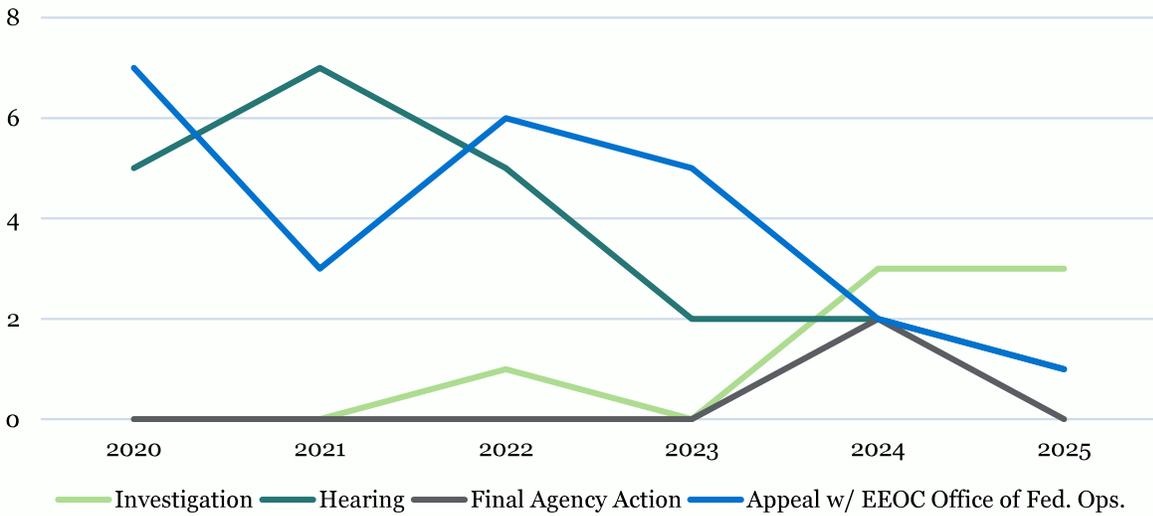


FIGURE 2: PENDING COMPLAINT STATUSES²² FY 2020 – FY 2025



²² At the end of FY 2020 through FY 2025, there were zero pending complaints at the ROI issued, pending complainant’s action stage.

Total new complaint filings and number of complainants

During FY 2025, the CFPB continued a downward trend in the number of formal EEO complaints filed compared with FY 2024 and FY 2023 (11 versus 15 and 18, respectively). The 11 complainants who filed formal complaints in FY 2025 represent 0.81 percent of the CFPB’s total workforce of 1,366 individuals.²³ This represents a decrease of 0.04 percent compared to FY 2024, when the ratio (of 15 complainants as a percentage of the total workforce of 1,app755 individuals) was 0.85 percent.

TABLE 1: FORMAL EEO COMPLAINANTS, FORMAL EEO COMPLAINTS, AND TOTAL WORKFORCE FIGURES AND RATIOS FOR THE CFPB FOR THE PAST SIX FISCAL YEARS

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
CFPB Formal EEO Complaints	18	19	13	18 ²⁴	15	11
CFPB Complainants	17	16	12	14	15	11
CFPB Total Workforce	1503	1593	1631	1675	1755	1366
CFPB Formal Complaints as Percentage of Total Workforce	1.20	1.19	0.80	1.07	0.85	0.81
CFPB Complainants as Percentage of Total Workforce	1.13	1.00	0.74	0.84	0.85	0.81

Figure 3 presents two graphs showing trends in informal and formal complaint activity from FY 2020 through FY 2025, along with corresponding figures for the total workforce at the end of each fiscal year (FYE). These graphs allow a visual comparison of complaint volume for the past six fiscal years and data on changes in the CFPB’s workforce over the same period.

²³ Total workforce encompasses employees on permanent and temporary appointments, including interns (if any).

²⁴ Three of these complaints are class complaints. All three filed individual complaints, which are also reflected in this total.

FIGURE 3: THE CFPB'S INFORMAL AND FORMAL EEO COMPLAINT ACTIVITY AND TOTAL WORKFORCE FY 2020 - FY 2025

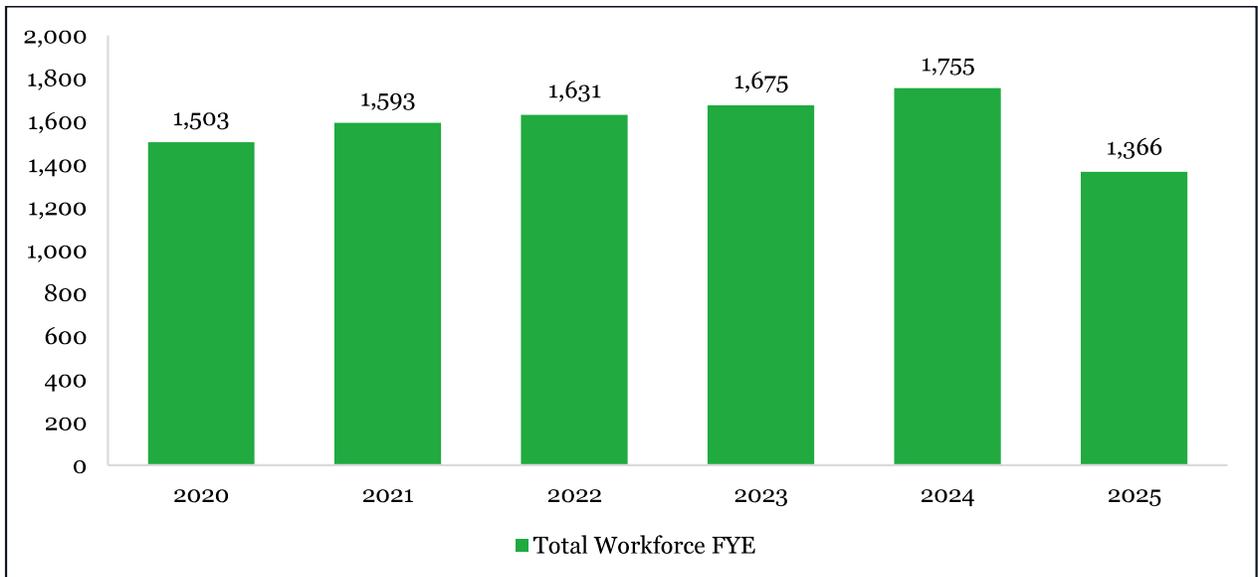
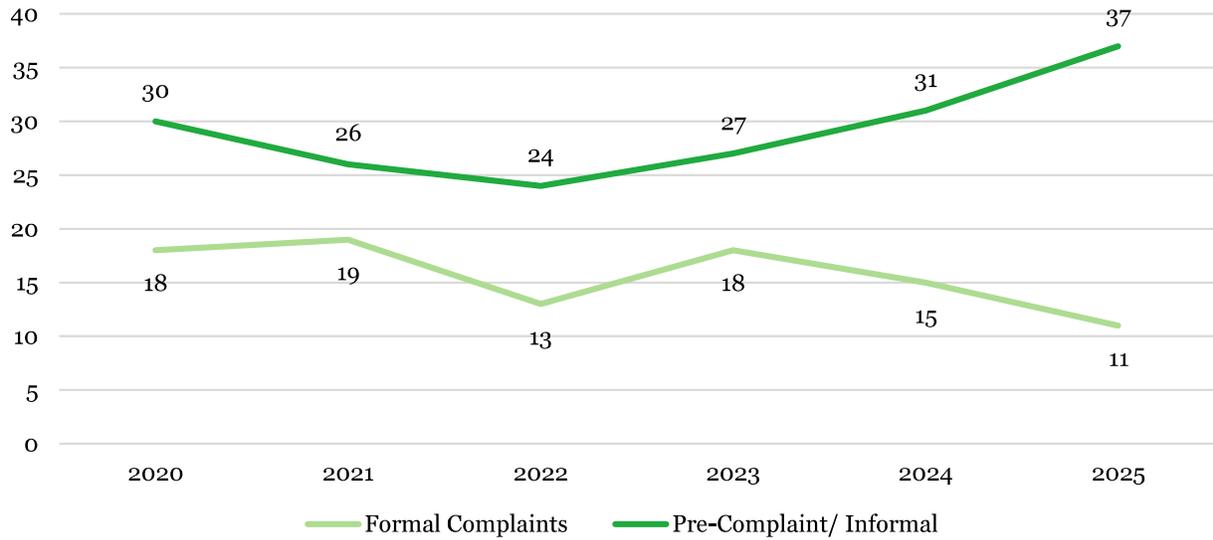


Figure 4 provides a graphical representation of formal EEO complaint activity and individual complainant figures since FY 2020.

FIGURE 4: THE CFPB'S FORMAL EEO COMPLAINT ACTIVITY FY 2020 – FY 2025



Bases and issues

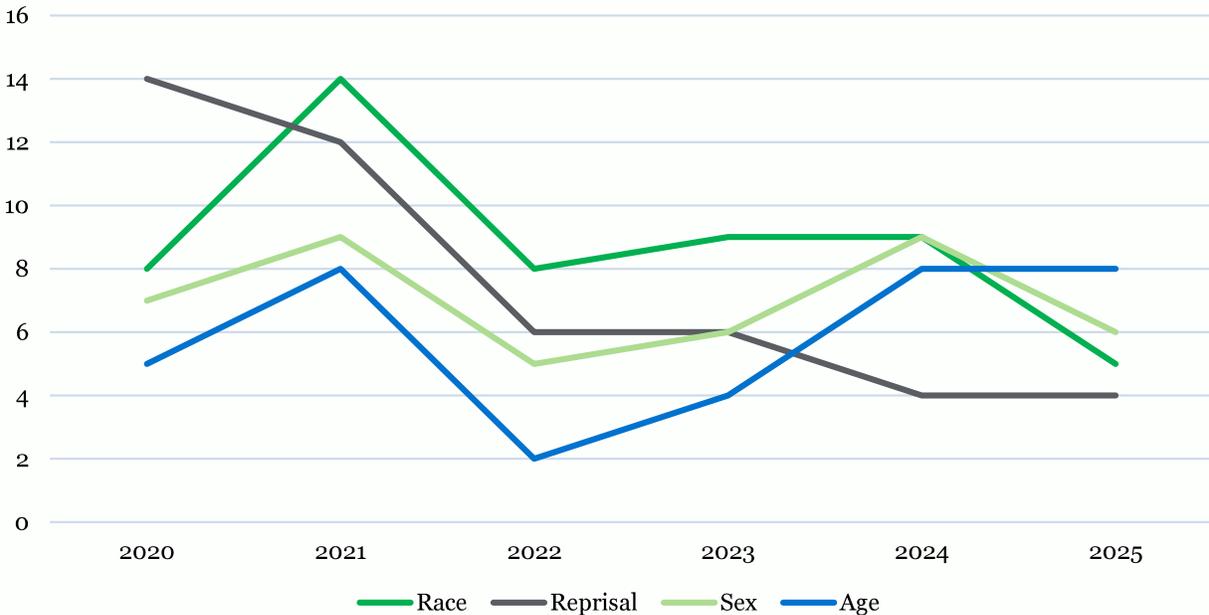
In FY 2025, the most frequently cited bases of discrimination in the 15 formal EEO complaints filed were Age (8), Sex (6), and Race (5).²⁵ In FY 2024, the most common bases alleged in the 18 formal EEO complaints were Race (9), Sex (9), and Age (8). The other bases alleged in FY 2025 formal EEO complaints are detailed in the quarterly data posted on the public website.²⁶

²⁵ Although there were 11 formal complaints filed in FY 2025, there are more than 11 total bases of discrimination alleged because a complainant may assert more than one basis per complaint.

²⁶ See <https://www.consumerfinance.gov/office-civil-rights/no-fear-act-cummings-act/>.

Figure 5 presents frequencies of bases appearing in the top three for any year from FY 2020 - FY 2025. Race and Sex were two of the top three bases for all six fiscal years. In FY 2025, Age was among the top three bases, just as it was in FY 2024. Reprisal was among the top three bases for FY 2020 through FY 2023.

FIGURE 5: FORMAL EEO COMPLAINT ACTIVITY BY BASIS FY 2020 – FY 2025



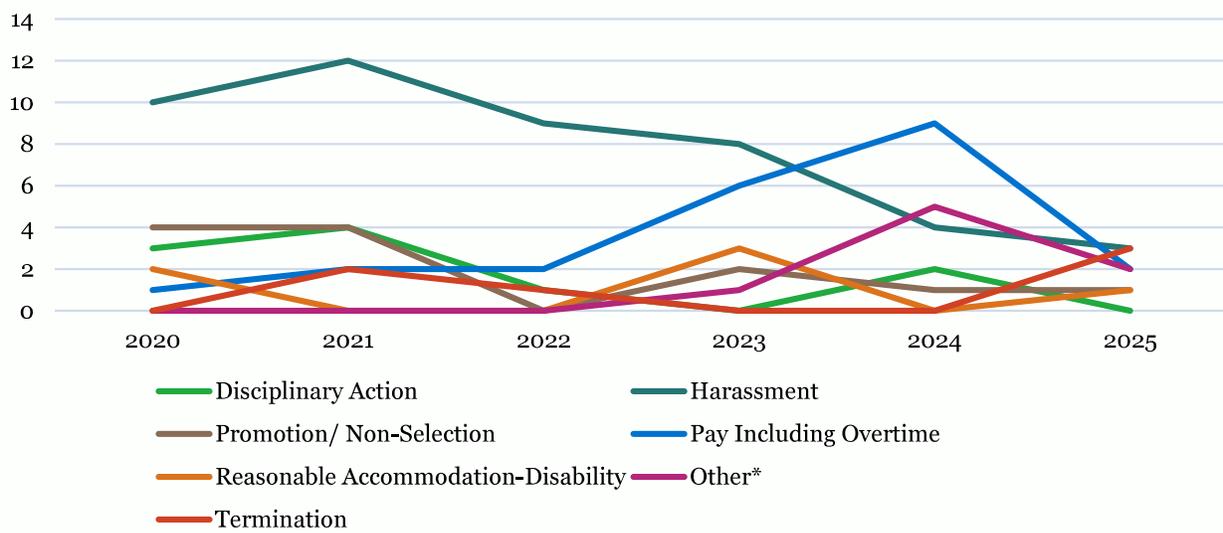
The most frequently raised issues in formal EEO complaints in FY 2025 were Harassment-Non-Sexual (3) and Termination (3). In comparison, FY 2024’s most frequently alleged issues were Pay Including Overtime (9), Harassment-Non Sexual (4), and Other.²⁷ The other issues raised in FY 2025 formal EEO complaints in the quarterly data posted on the public website.²⁸

Figure 6 presents frequencies of issues appearing in the top three for any year from FY 2020 – FY 2025.

²⁷ In an effort to streamline reporting, the EEOC consolidated issues that were previously listed under Assignment of Duties, Conversion to Full Time/Permanent Status, Reinstatement, Retirement, and Terms and Conditions of Employment.

²⁸ See <https://www.consumerfinance.gov/office-civil-rights/no-fear-act-cummings-act/>.

FIGURE 6: FORMAL EEO COMPLAINT ACTIVITY BY ISSUE FY 2020 – FY 2025



* In an effort to streamline reporting, the EEOC consolidated issues that were previously listed under Assignment of Duties, Conversion to Full Time/Permanent Status, Reinstatement, Retirement, and Terms and Conditions of Employment.

Bases and issues in the CFPB’s formal EEO complaint filings in FY 2025 were somewhat consistent with government-wide and comparable agency statistics. According to the EEOC, across the Federal government in FY 2021, Reprisal was the most frequently cited basis, followed by Age and Disability (physical).²⁹ Additionally, in FY 2025, Reprisal, Race, Sex, Age, and Disability were among the most common complaint bases among other medium-sized financial regulatory agencies with at least 10 complaints.³⁰ Reprisal was a top three basis alleged for FDIC, FHFA, OCC, and SEC. It was not in the top three bases alleged for the CFPB. Both Race and Sex were a top three basis alleged for the CFPB, but not for the OCC. Race and Sex were a top three basis alleged for FDIC, FHFA, OCC and SEC. Age was a top three basis alleged for the CFPB and OCC, but not for FDIC, FHFA, and SEC.

The EEOC tables for FY 2021 formal EEO complaint data indicate the most frequently alleged issue in formal complaints government-wide was Non-Sexual Harassment, followed by

²⁹ See EEOC’s Federal Workforce Report for Fiscal Year 2021, available at <https://www.eeoc.gov/newsroom/eeoc-issues-federal-workforce-report-fiscal-year-2021>. As of January 2026, more recent comparison data is not available.

³⁰ FDIC data is located at <https://www.fdic.gov/about/diversity/nofear/nfreport.html>. OCC data is located at <https://home.treasury.gov/footer/no-fear-act>. SEC data is located at <https://www.sec.gov/eeoinfo/nofeardata.htm>. FHFA data is located at <https://www.fhfa.gov/reports/no-fear-report>.

Disciplinary Action and then Time and Attendance.³¹ In FY 2025, Non-Sexual Harassment, Disciplinary Action, Performance Evaluation/Appraisal, Reasonable Accommodation-Disability, Termination and Other³² were all among the most common issues for medium-sized financial regulatory agencies that have had more than ten formal EEO complaints filed. Termination was only a top three issue alleged at the CFPB and not at the other financial regulatory agencies (i.e., FDIC, FHFA, OCC or SEC). Non-Sexual Harassment was a top three issue alleged at all of the agencies (i.e., CFPB, FDIC, FHFA, OCC, and SEC).

Processing times

In FY 2025, OCR completed 38 EEO counselings under 29 C.F.R. Part 1614. OCR received a total of 37 new informal complaints/requests for EEO counseling during FY 2025 (not all were completed before the end of FY 2025); this compares with 31 new counseling requests in FY 2024. All counselings completed in FY 2025 qualified as timely under 29 C.F.R. § 1614.105 except for two anomalies.³³ Nine counselings were timely completed within 30 days; 25 traditional counselings were completed timely with written extensions of no longer than 60 days. Two counselings were processed through the CFPB's ADR program and were timely completed within 90 days.³⁴ In each of these counselings, the CFPB provided the required notification to individuals on their various rights and responsibilities in the EEO process. This information was provided during the initial counseling session verbally and later in writing.³⁵

As noted above, in FY 2025, 11 new formal EEO complaints were filed under 29 C.F.R. Part 1614 and/or Executive Order 11478 (as amended). In all new formal EEO complaints, the CFPB issued acknowledgement letters immediately upon receipt of a formal complaint.³⁶ Of the 11 new formal EEO complaints that were filed in FY 2025, the average length of time for issuing the acknowledgement letter was three days. In addition, OCR issued all Acceptance letter/Dismissal decisions within a reasonable time (e.g., 30 days) after receipt of the formal complaint.³⁷ Specifically, of the 11 new formal EEO complaints that were filed in FY 2025, the

³¹ See EEOC's Federal Workforce Report for Fiscal Year 2021, available at <https://www.eeoc.gov/newsroom/eeoc-issues-federal-workforce-report-fiscal-year-2021>.

³² In an effort to streamline reporting, the EEOC consolidated issues that were previously listed under Assignment of Duties, Conversion to Full Time/Permanent Status, Reinstatement, Retirement, and Terms and Conditions of Employment.

³³ Two untimely counselings due to the February 10, 2025 stop work order.

³⁴ See 29 C.F.R. §§ 1614.105(d), (f).

³⁵ See 29 C.F.R. § 1614.105(b)(1).

³⁶ See MD-110, Chapter 5, at Section I.

³⁷ Id.

average length of time for issuing the Accept/Dismiss communication was 14 days. In FY 2025, the CFPB dismissed five formal complaints; the average days such complaint was pending before dismissal was 13 days. The average number of days for these items was shorter than FY 2024.

In FY 2025, OCR conducted all investigations of formal EEO complaints within the regulatory timeframes, and in some cases decreasing the timeframes from the previous fiscal year.³⁸ The three investigations completed by OCR staff during FY 2025 were completed in an average of 221.33 days and four investigations completed by contractors during FY 2025 were completed in an average of 307.75 days.

With respect to formal complaint processing, in FY 2025:

- The average number of days in investigation for complaints pending for any length of time during the fiscal year (for which investigations were completed during the fiscal year) was 270.71 days, an increase from an average of 220.50 days in FY 2024 and an average of 160.50 days in FY 2023;
- All investigations that were processed by the CFPB's OCR staff in FY 2025 were completed timely;
- The average number of days in final-action status for complaints pending for any length of time during FY 2025 was 44.00, which was less than FY 2024 which was 46.33 days, and more than FY 2023 which was 31.60 days. All Final Agency Decisions (FADs) and Final Agency Orders (FAOs) were issued on time;

Practical knowledge gained

The CFPB has worked to create a best-in-class EEO program. Lessons learned include:

- To sustain a viable EEO program, the EEO office must be authorized and empowered to drive a whole-of-CFPB strategy, by collaborating with the CFPB's leaders, other CFPB offices including DAPS and OHC, and related stakeholders.
- A commitment from top-level leadership to EEO, which shapes workplace culture, inspires employee confidence, and aids legal compliance. This commitment is best

³⁸ See 29 C.F.R. § 1614.108(f).

manifested through tangible actions by the CFPB Director and Senior Leaders to support EEO and visibly and actively incorporate the EEO program as a valued partner.

- Ensure supervisors and employees understand their rights and responsibilities under workplace civil rights and merit system principles through trainings and regular communications.
- Maintaining EEO office independence – i.e., preserving organizational autonomy from the Legal Division, the Office of Human Capital, and other offices that have different roles – is indispensable to safeguarding the statutory enforcement mechanisms Federal law and the EEOC require agencies to establish and maintain to remedy civil rights violations.
- Resolving issues early and expeditiously helps maintain a work environment that fosters open communication, trust, and engagement. Used properly in appropriate circumstances, Alternative Dispute Resolution (e.g., mediation, conflict coaching program) can provide faster, less expensive and contentious, and more productive results in eliminating workplace disputes, including claims of discrimination, harassment, and retaliation and workstyle or personality conflicts that may arise.

EEO Program action plans

OCR has applied – and will continue to apply – the above experience and insights gained as the CFPB’s EEO program evolves. The CFPB’s FY 2025 EEO Program Status (Management Directive 715) Report will provide a detailed review of the CFPB’s EEO program efforts and outline activities planned for FY 2026 and beyond.³⁹

In FY 2026 the CFPB’s OCR will continue enhancing the EEO program and intends to:

- Continue staying apprised of new developments in Executive Orders, instructions from OPM and the EEOC, and other guidance that may impact OCR’s work and make changes as necessary.
- Further enhance the ADR Program by focusing on preserving, rebuilding or repairing relationships.

³⁹ When finalized, this program status report will be posted on <https://www.consumerfinance.gov/office-civil-rights/eo-policy-and-reports/>. (MD-715 reports for previous fiscal years also are currently available on this external website.)

- Collaborate with OHC, as needed, to ensure the action items in the MD-715 Part H-2 and Part I-1 are implemented in order to eliminate identified deficiencies.
- Maintain accuracy and efficiency of EEO complaint data monitoring, tracking, and reporting through continued use of Entellitrak (called ETK EEO) and continued enforcement of robust internal controls related to data tracking, monitoring and reporting.

3.5 No FEAR Act training

The No FEAR Act requires each Federal agency to train all employees regarding the rights and remedies applicable to them under the relevant antidiscrimination and whistleblower protection laws.⁴⁰

Every other year, all of the CFPB's employees must take a one-hour, web-based training on the No FEAR Act. The mandatory No FEAR Act training was completed in FY 2024 and is expected again during FY 2026. Before the end of FY 2026, CFPB employees will take No FEAR Act training through the Learning Management System. New hires are provided No FEAR Act training within 90 days of starting at the CFPB.

During FY 2025, OCR, in partnership with the CFPB's other offices such as OHC and the Legal Division, worked to ensure the CFPB's managers, supervisors, and all employees are aware of, have physical or electronic copies of, and/or know where to access all EEO policies and procedures and related information. The CFPB made use of virtually all the ideas suggested by the EEOC in its publication entitled *Preserving Access to the Legal System: A Practical Guide to Providing Employees with Adequate Information about Their Rights under Federal Equal Employment Opportunity (EEO) Laws and Regulations*.⁴¹ The Legal Division, OCR, OHC and OMWI (including DAPS) continued to share a one-page Management Guide for Common Workplace Issues that indicates which office handles particular issues and which office(s) may also serve as a resource along with current contact information.

⁴⁰ See Pub. L. No. 107-174, Section 202(c); see also 5 C.F.R. § 724.203.

⁴¹ This guidance is available at http://www.eeoc.gov/federal/preserving_access.cfm.

APPENDIX A:

Class complaints

In FY 2023, three class complaints were filed, which are described in the following three tables.⁴²

- Information regarding the date on which each complaint was filed;
- A general summary of the allegations alleged in the complaint;
- An estimate of the total number of plaintiffs joined in the complaint, if known;
- The current status of the complaint, including whether the class has been certified; and
- The case numbers for the civil actions in which discrimination (including retaliation) has been found.

TABLE 2: CLASS COMPLAINT 1

Class Complaints	FY 2025 - Class Complaint 1
Date complaint filed	8/14/2023
Allegations alleged (including bases)	<p>CFPB violated Title VII by discriminating against minority (non-white) NTEU Bargaining Unit employees in terms of their compensation based on the class members' race and, for female minority (non-white) NTEU Bargaining Unit employees, on the basis of their race and sex.</p> <p>a) Assigning minorities to a lower pay band and/or pay grade at time of their transfer into CFPB from other federal agencies, or at the time of their hire, than white employees.</p> <p>b) Denying promotions to qualified minority employees while promoting less or equally qualified white employees.</p>

⁴² This information is provided in accordance with § 301(b) of the Notification and Federal Employee Anti-discrimination and Retaliation Act of 2002, 5 U.S.C. 2301 note, Pub. L. 107-174 (No FEAR Act), as amended by the Elijah E. Cummings Federal Employee Antidiscrimination Act of 2020. See H.R. 6395, The National Defense Authorization Act for Fiscal Year 2021, Pub. L. 116-283 (Cummings Act), at Subtitle B § 1135, 134 Stat. 3902.

Class Complaints	FY 2025 - Class Complaint 1
	<p>c) Utilizing subjective criteria to qualify employees for positions and promotions to the disadvantage of minority employees.</p> <p>d) Failing to credit minorities and, in particular, minority women, for their work experience on the same basis as white or white male employees.</p> <p>e) Systematically paying minorities, and in particular minority women, lower wages and denying minority employees' requests to adjust their pay to make it commiserate with their white counterparts.</p> <p>f) Employing bureau-wide performance evaluation policies that disproportionately resulted in higher performance ratings for white employees and lower performance ratings for minority employees, which in turn negatively impacted compensation for minority employees and, in particular, minority women.</p> <p>g) In conjunction with the 2023 Pay Resetting Process, failing to adjust minority employees' pay bands to place them in the same pay bands as white employees with the same level of direct and indirect job experience.</p>
Estimate of total Class	Unknown
Current status	EEOC dismissed pending class determination of CFPB-0029-2023
Case number(s) for civil actions where discrimination was found	N/A

TABLE 3: CLASS COMPLAINT 2

Class Complaints	FY 2025 - Class Complaint 2
Date complaint filed	9/11/2023
Allegations alleged (including bases)	CFPB violated Title VII by discriminating against minority (non-white) NTEU Bargaining Unit employees in terms of their compensation based on the class members' race and, for female minority (non-white) NTEU Bargaining Unit employees, on the basis of their race and sex.

Class Complaints	FY 2025 - Class Complaint 2
	<p>a) Assigning minorities to a lower pay band and/or pay grade at time of their transfer into CFPB from other federal agencies, or at the time of their hire, than white employees.</p> <p>b) Denying promotions to qualified minority employees while promoting less or equally qualified white employees.</p> <p>c) Utilizing subjective criteria to qualify employees for positions and promotions to the disadvantage of minority employees.</p> <p>d) Failing to credit minorities and, in particular, minority women, for their work experience on the same basis as white or white male employees.</p> <p>e) Systematically paying minorities, and in particular minority women, lower wages and denying minority employees' requests to adjust their pay to make it commiserate with their white counterparts.</p> <p>f) Employing bureau-wide performance evaluation policies that disproportionately resulted in higher performance ratings for white employees and lower performance ratings for minority employees, which in turn negatively impacted compensation for minority employees and, in particular, minority women.</p> <p>g) In conjunction with the 2023 Pay Resetting Process, failing to adjust minority employees' pay bands to place them in the same pay bands as white employees with the same level of direct and indirect job experience.</p>
Estimate of total Class	Unknown
Current status	Pending a determination on EEOC class certification
Case number(s) for civil actions where discrimination was found	N/A

TABLE 4: CLASS COMPLAINT 3

Class Complaints	FY 2025 - Class Complaint 3
Date complaint filed	9/29/2023

Class Complaints**FY 2025 - Class Complaint 3**

CFPB violated Title VII by discriminating against minority (non-white) NTEU Bargaining Unit employees in terms of their compensation based on the class members' race and, for female minority (non-white) NTEU Bargaining Unit employees, on the basis of their race and sex.

a) Assigning minorities to a lower pay band and/or pay grade at time of their transfer into CFPB from other federal agencies, or at the time of their hire, than white employees.

b) Denying promotions to qualified minority employees while promoting less or equally qualified white employees.

c) Utilizing subjective criteria to qualify employees for positions and promotions to the disadvantage of minority employees.

d) Failing to credit minorities and, in particular, minority women, for their work experience on the same basis as white or white male employees.

e) Systematically paying minorities, and in particular minority women, lower wages and denying minority employees' requests to adjust their pay to make it commiserate with their white counterparts.

f) Employing bureau-wide performance evaluation policies that disproportionately resulted in higher performance ratings for white employees and lower performance ratings for minority employees, which in turn negatively impacted compensation for minority employees and, in particular, minority women.

g) In conjunction with the 2023 Pay Resetting Process, failing to adjust minority employees' pay bands to place them in the same pay bands as white employees with the same level of direct and indirect job experience.

Allegations alleged (including bases)

Estimate of total Class	Unknown
Current status	EEOC dismissed pending class determination of CFPB-0029-2023
Case number(s) for civil actions where discrimination was found	N/A