

Annual Performance Plan and Report, and Budget Overview

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Overview of the Consumer Financial Protection Bureau

The Consumer Financial Protection Bureau (CFPB) was established on July 21, 2010, under Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act Public Law No. 111-203 (Dodd-Frank Act). The CFPB is an independent bureau within the Federal Reserve System, and an executive agency as defined in Section 105 of Title 5, United States Code.

The Dodd-Frank Act authorizes the CFPB to exercise its authorities to ensure that, with respect to consumer financial products and services:¹

- Consumers are provided with timely and understandable information to make responsible decisions about financial transactions;
- Consumers are protected from unfair, deceptive, or abusive acts and practices and from discrimination;
- Outdated, unnecessary, or unduly burdensome regulations are regularly identified and addressed in order to reduce unwarranted regulatory burdens;
- Federal consumer financial law is enforced consistently in order to promote fair competition; and
- Markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.

The CFPB is headed by a Director, appointed by the President to a five-year term, by and with the advice and consent of the Senate.

The CFPB is funded principally by transfers from the Federal Reserve System, up to the limits set forth in the Dodd-Frank Act. More information can be found in the Budget Overview section of this document.

¹ As set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203 (2010), Section 1021(b).

Mission, Vision, and Values

The CFPB *Strategic Plan for Fiscal Year (FY) 2022 – FY 2026* identifies the following mission, vision, and values, which guide the work of the CFPB.

Mission

To regulate the offering and provision of consumer financial products or services under the federal consumer financial laws, to enforce Federal consumer financial law fairly and consistently, and to educate and empower consumers making financial decisions.

Vision

To ensure all households have access to markets for consumer financial products and services that are fair, transparent, and competitive. In a market that works, the prices, risks, and terms of the deal are clear upfront so that consumers can understand their options and comparison shop, and companies all play by the same consumer protection rules and compete fairly on providing quality and service.

Values

To achieve this vision, the CFPB is guided by the following values:

Service. We work for the American public, putting traditionally underserved people at the center of all that we do.

Dedication. We are committed to the mission and to deploying the CFPB's tools and resources to address the needs of communities, providers, and the economy as a whole.

Diversity. We strive to maintain a diverse workforce and an equitable, inclusive, and accessible workplace for all employees.

Strategic Plan Overview

The FY 2024 Annual Performance Plan and Report (APP) aligns to CFPB's Strategic Plan for FY 2022-2026, which can be found at <https://www.consumerfinance.gov/about-us/budget-strategy/strategic-plan/>.

CFPB's FY 2022 – 2026 strategic plan includes four strategic goals and eleven associated objectives, detailed below.

CFPB FY 22—26 Strategic Plan

Goal 1: Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers' needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination.

Objective 1.1: Issue rules and guidance implementing Federal consumer financial law.

Objective 1.2: Supervise institutions to ensure compliance with Federal consumer financial laws.

Objective 1.3: Enforce Federal consumer financial laws to hold violators accountable and deter misconduct and repeat offenses.

Goal 2: Empower consumers to live better financial lives, focusing on traditionally underserved people.

Objective 2.1: Engage with consumers, directly and through trusted partners, to provide information, guidance, and technical assistance regarding consumer financial products and services.

Objective 2.2: Collect consumers' inquiries and complaints, and work to ensure companies offering consumer financial products and services provide responses to consumers' complaints.

Objective 2.3: Expand the CFPB's reach and build relationships with external stakeholders and government partners to amplify relevant tools, messages, and resources.

Goal 3: Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services.

Objective 3.1: Monitor consumer financial markets to surface relevant trends and identify areas of risk to consumers.

Objective 3.2: Conduct and publish research focused on: (a) experiences of underserved communities and their access to credit, (b) consumer awareness, understanding, and behavior with respect to consumer financial products and services and with respect to disclosures and related communications, and (c) market developments impacting consumers, including competition and innovation.

Goal 4: Foster operational excellence and further commitment to workforce equity to advance the CFPB's mission.

Objective 4.1: Cultivate an engaged and informed workforce to maximize talent and development in alignment with the CFPB's mission.

Objective 4.2: Define and implement a modern, forward-leaning workplace model that is responsive to the CFPB's organizational needs.

Objective 4.3: Advance the work of the CFPB through innovative and optimized operational support.

About the FY 2024 APP

This APP was developed between December 2023 – January 2024. It identifies the performance measures and targets for each strategic goal and objective, as well as:

- Presents FY 2023 performance results;
- Describes CFPB's accomplishments; and
- Provides CFPB's most current view of budget projections for FY 2024-2025.

The GPRAMA Modernization Act (GPRAMA) of 2010 asks agencies to identify lower-priority program activities, where applicable – CFPB has none.

Budget Overview

The CFPB’s operations are funded principally by transfers made by the Board of Governors of the Federal Reserve System (Board) from the combined earnings of the Federal Reserve System, up to the limits set forth in the Dodd-Frank Act. The CFPB Director requests transfers from the Board in amounts that he or she has determined are reasonably necessary to carry out the CFPB’s mission within the limits set forth in the Dodd-Frank Act. Transfers from the Board were capped at \$750.9 million in Fiscal Year (FY) 2023 and are capped at \$785.4 million in FY 2024 and \$823.1 million in FY 2025. Funds transferred from the Federal Reserve System are deposited into the Bureau of Consumer Financial Protection Fund (CFPB Fund) at the Federal Reserve Bank of New York.

The FY 2024 and FY 2025 budget estimates for the CFPB Fund allow the CFPB to continue to fulfill its statutory purpose, objectives, and functions pursuant to Section 1021 of the Dodd-Frank Act. In FY 2023, the CFPB incurred obligations totaling \$696.6 million. The budget estimates for FY 2024 and FY 2025 increase to \$762.9 million and \$810.6 million, respectively. The FY 2024 budget estimate represents a 9.5% increase from FY 2023 levels, while the FY 2025 estimate represents a 6.2% increase from FY 2024.

Budget by Strategic Goal

BUDGET BY STRATEGIC GOAL (\$ IN THE MILLIONS AND ROUNDED)

	2023	%	2024	%	2025	%
Goal 1	\$303.5	44%	\$336.8	44%	\$363.4	45%
Goal 2	\$92.0	13%	\$72.8	10%	\$76.7	9%
Goal 3	\$88.6	13%	\$119.2	16%	\$124.6	15%
Goal 4	\$212.5	31%	\$234.1	31%	\$245.9	30%
Total	\$696.6	100%	\$762.9	100%	\$810.6	100%

FTE BY STRATEGIC GOAL (ROUNDED)

	2023	%	2024	%	2025	%
Goal 1	871	52%	931	52%	980	53%
Goal 2	208	13%	137	8%	143	8%
Goal 3	208	13%	311	18%	318	17%
Goal 4	375	23%	399	22%	414	22%
Total	1,662	100%	1,778	100%	1,854	100%

Budget increases across all goals reflect increased hiring towards the approved staffing targets as well as additional funding for new initiatives in pursuit of the CFPB's mission and strategic goals.

Goal 1: Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers' needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination.

Activities related primarily to supervision and enforcement, and issuance and guidance implementation of consumer financial laws, which are included in Goal 1, represent the largest portion of the CFPB's budget. The CFPB plans to increase staffing and other resources as it continues to increase its capacity to enforce the law to ensure markets for consumer financial products and services are fair, transparent, and competitive. The CFPB will continue to invest in supervision and enforcement technology tools, as well as its investigation and litigation support to support the CFPB's supervision and enforcement work.

Costs related to supervision and enforcement training and travel are increasing as the CFPB slowly returns to conducting more supervision exams and reviews of depository and non-depository institutions on-site.

Goal 2: Empower consumers to live better financial lives, focusing on traditionally underserved people.

Activities related to consumer education, consumer engagement, and handling of consumer complaints in Goal 2 represent around 10% of the CFPB's overall budget. To support this goal, the CFPB will continue to invest in helping consumers understand and enforce their rights under federal consumer financial law; facilitate the collection, monitoring, and response to consumer complaints; and increase the effectiveness of governing consumer financial markets.

Goal 3: Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services.

Activities related to rulemaking, research, regulatory implementation, and monitoring developments and trends in consumer financial markets in Goal 3 represent around 16% of the CFPB's overall budget. Cost increases for the Small Business Lending Rule reflect the full-scale design and build-out of a regulatory data collection system for Small Business Lending Rule. The CFPB will continue to invest in further studies and market research focused on underserved consumers. It will also continue to invest resources to the HMDA Platform and National Mortgage Database to ensure consumer financial markets operate in a transparent, efficient, and inclusive manner to facilitate access and innovation.

Goal 4: Foster operational excellence and further commitment to workforce equity to advance the CFPB’s mission.

Activities in Goal 4 represent 31% of the budget and reflect the CFPB’s commitment to fostering operational excellence and cultivating an equitable, informed, and engaged workforce to advance the CFPB’s mission. In FY 2024, the largest increases are primarily driven by significant investments in information technology (IT) as the CFPB continues to implement its vision and strategy to modernize its IT systems and services. This includes enhancing cybersecurity capabilities as required under Executive Order 14028,² including implementation of Zero Trust Architecture and other Federal cybersecurity standards, along with migrating data and applications into a cloud-native environment and focusing IT program and project management on the prioritization of IT systems that meet the security and data sharing needs by internal and external stakeholders. Additionally, increases in the CFPB’s legal technology shared service center reflect costs associated with its contract re-compete such as revised labor rates and transition costs.

To manage risk and promote accountability, the CFPB will continue to develop its capabilities to identify and mitigate enterprise risks, improve the management of internal policies, provide effective governance, effectively review and assess internal controls; and continue to support required audits.

Budget by Object Class and Program

BUDGET BY OBJECT CLASSIFICATION (\$ IN THE MILLIONS AND ROUNDED)

Object Classification	FY 2023	FY 2024	FY 2025
Personnel Compensation	\$303.8	\$348.1	\$377.1
Personnel Benefits	\$124.2	\$137.5	\$147.8
Benefits to Former Personnel	\$0.0	\$0.0	\$0.0
Travel and Transportation of Persons	\$6.0	\$7.6	\$7.9
Transportation of Things	\$0.1	\$0.1	\$0.1
Rents, Communications, and Misc. Charges	\$10.9	\$12.1	\$12.5
Printing and Reproduction	\$1.5	\$1.6	\$1.6

² The CFPB is an independent agency within the Federal Reserve System and is voluntarily following the Executive Order.

Object Classification	FY 2023	FY 2024	FY 2025
Other Contractual Services	\$210.9	\$224.2	\$230.9
Supplies and Materials	\$7.7	\$7.1	\$7.3
Equipment	\$31.2	\$24.6	\$25.4
Land and Structures	\$0.2	\$0.0	\$0.0
Total	\$696.6	\$762.9	\$810.6

The CFPB’s budget reflects increases primarily in personnel and benefit compensation, travel, communications, and other contractual services.

Personnel Compensation and Benefits

Personnel Compensation and Benefits costs represent the largest cost to the CFPB. The CFPB is expanding its capacity to enforce the law by adding positions to the Enforcement Office as well as to the Legal, Operations, and Research, Monitoring, and Regulations (RMR) Divisions. Personnel compensation and benefits costs reflects current estimates for merit increases, locality pay, lump sum payments, and the awards and recognition program, etc.

Travel and Transportation of Persons

The estimated travel cost increases in FY 2024 reflect projected travel related primarily to examination travel within the Supervision, Enforcement, and Fair Lending Division.

Rents, Communications, and Misc. Charges

Increases in communications reflect upgrades to audiovisual (AV) technology resources across all CFPB facilities and the award of a new wireless service provider contract for smartphones, tablets, and Wi-Fi hotspots. These costs also provide staff with dedicated on-site and remote meeting support for AV coordination planning, troubleshooting, conference room support, and other services.

Contractual Services

Increases in contractual services reflect investments to support many of the CFPB initiatives as described throughout this document. The increases are primarily within the Supervision, Enforcement, and Fair Lending Division for investigation and litigation support on Enforcement matters. Additionally, within the Operations program, increased investments will support information technology and systems initiatives, the continued migration to a cloud infrastructure and cloud-based solutions, enhancements to its cybersecurity program, and maintenance to the CFPB’s Headquarters building.

Equipment

Overall cost for equipment decreased for FY 2024 because the Operations Division completed the relocation of the Northeast Regional Office in FY 2023 which included the acquisition of new furniture and design, installation, and disposal services.

BUDGET BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2023	FY 2024	FY 2025
Office of the Director	\$28.1	\$31.0	\$33.2
Operations	\$252.6	\$270.5	\$282.7
Consumer Response and Education	\$0.0	\$61.7	\$64.2
Consumer Education and External Affairs ³	\$76.0	\$0.0	\$0.0
Research, Monitoring, and Regulations	\$81.5	\$87.0	\$91.6
Supervision, Enforcement, and Fair Lending	\$215.7	\$244.7	\$266.2
Legal	\$23.4	\$27.6	\$30.0
External Affairs	\$0.0	\$16.8	\$17.6
Other Programs ⁴	\$4.2	\$5.5	\$6.5
Centralized Services ⁵	\$15.1	\$18.3	\$18.7
Total	\$696.6	\$762.9	\$810.6

³ In FY 2024, the Consumer Education and External Affairs Division (CEEA) split into separate divisions to become the Consumer Response and Education Division and the External Affairs Division, respectively.

⁴ Other Programs includes the CFPB Ombudsman's Office, Administrative Law Judges, and Director's Financial Analyst program.

⁵ Includes the cost of certain services provided centrally to other Divisions (*e.g.*, interns and costs associated with the Office of the Inspector General) in support of all strategic goals.

FULL-TIME EQUIVALENT (FTE)⁶ BY PROGRAM

Division or Office	FY 2023	FY 2024	FY 2025
Office of the Director	98	105	109
Operations	302	323	335
Consumer Response and Education	0	142	144
Consumer Education and External Affairs	196	0	0
Research, Monitoring, and Regulations	236	257	262
Supervision, Enforcement, and Fair Lending	718	765	808
Legal	81	90	95
External Affairs	0	53	54
Other Programs	27	33	39
Centralized Services ⁷	5	9	8
Total	1,662	1,778	1,854

You can learn more about the CFPB’s organizational structure at <https://www.consumerfinance.gov/about-us/the-bureau/bureau-structure/>.

CFPB Fund Budget Authority

The CFPB Director requests the Board transfer funds in the amount that he or she has determined are reasonably necessary to carry out the CFPB’s mission within the limits set forth in the Dodd-Frank Act. Transfers through FY 2013 were capped at pre-determined percentages of the total 2009 operating expenses of the Federal Reserve System. Including and since FY 2014, these transfer caps have been adjusted annually based on the percentage increase in the employment cost index (ECI) for the total compensation for State and local government workers, which is published by the Bureau of Labor Statistics. Transfers from the Board were capped at \$750.9 million in FY 2023 and are capped at \$785.4 million in FY 2024 and \$823.1

⁶ Full-Time equivalent (FTE) is a measure of employment levels used for budgetary purposes. FTE is calculated by dividing the total number of working hours (or projected working hours) by total number of compensable hours in a given fiscal year.

⁷ Reflects Intern FTE in support of all strategic goals.

million in FY 2025.⁸ Funds transferred from the Federal Reserve System are deposited into the CFPB Fund, which is maintained at the Federal Reserve Bank of New York.

The CFPB also generates additional budget authority by offsetting collections and miscellaneous revenue. For example, the Federal Financial Institutions Examination Council (FFIEC) and the Department of Housing and Urban Development (HUD) have an interagency agreement under which the CFPB now operates and manages on behalf of the agencies⁹ for the collection, processing, and publication of the HMDA Data. The CFPB processes the HMDA Data for the FFIEC and HUD and prepares and makes available data products to the general public. As a result, agencies reimburse the CFPB for a portion of the costs associated with operating the system on behalf of the FFIEC.

A small portion of the CFPB’s budget comes from receipts collected from interest on Treasury securities as well as filing fees pursuant to the Interstate Land Sales Full Disclosure Act of 1968 (ILSA). ILSA fees are deposited into an account maintained by the Department of the Treasury and may be expended for the purpose of covering all or part of the costs that the CFPB incurs to operate the ILSA Program.

CFPB FUND (\$ IN THE MILLIONS AND ROUNDED)

	FY 2023	FY 2024	FY 2025
Unobligated Balances, start of year	\$128.2	\$203.4	\$232.8
Transfers from the Federal Reserve Board	\$721.2	\$762.9	\$810.6
Other Receipts	\$24.2	\$18.3	\$15.0

⁸ Per the Dodd-Frank Act, the transfer limit or “cap” shall be adjusted annually, using the percentage increase, if any, in the employment cost index (ECI) for total compensation for State and local government workers published by the Federal Government, or the successor index thereto, for the 12-month period ending on September 30 of the year preceding the transfer. The CFPB Fund’s transfer cap is calculated using the September ECI published by the Bureau of Labor Statistics (BLS) in October of each year. In FY 2025, the transfer cap is \$823.1 million, which is an increase of \$37.7 million, or 4.8%, from the FY 2024 transfer cap of \$785.4 million. The ECI for September 2023 (4.8%) was published by BLS on October 31, 2023.

⁹ The “Agencies” are defined as the federal agency members of the FFIEC: Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC), the Board of Governors of the Federal Reserve System (Board), the National Credit Union Administration (NCUA), and the Consumer Financial Protection Bureau (CFPB). Department of Housing and Urban Development (HUD) is not an FFIEC member but is part of the HMDA cost sharing MOU for HMDA data.

	FY 2023	FY 2024	FY 2025
Sequestration – Temporarily Reduced ¹⁰	-\$42.7	-\$44.5	-\$47.1
Sequestration – Previously Unavailable	\$36.7	\$42.7	\$44.5
Offsetting Collections	\$2.8	\$2.9	\$2.9
Recoveries of Prior Year Obligations	\$29.6	\$10.0	\$8.0
Total Budgetary Resources	\$900.0	\$995.7	\$1,066.8
Total Obligations	\$696.6	\$762.9	\$810.6
Unobligated Balances, end of year	\$203.4	\$232.8	\$256.2

¹⁰ The Office of Management and Budget (OMB) determined that amounts in the CFPB Fund that are temporarily reduced by sequestration will become available in a subsequent fiscal year without further legislative action.

Goal 1. Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers’ needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination

BUDGET BY STRATEGIC GOAL 1 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2023	FY 2024	FY 2025
Office of the Director	\$5.8	\$6.1	\$6.4
Operations	\$41.5	\$41.2	\$43.0
Consumer Response and Education	\$0.0	\$0.5	\$0.5
Consumer Education and External Affairs	\$0.0	\$0.0	\$0.0
Research, Monitoring, and Regulations	\$28.2	\$29.7	\$31.4
Supervision, Enforcement, and Fair Lending	\$215.7	\$244.7	\$266.2
Legal	\$8.0	\$8.7	\$9.5
External Affairs	\$0.0	\$0.0	\$0.0
Other Programs	\$1.3	\$1.9	\$2.3
Centralized Services	\$3.1	\$4.1	\$4.2
Total	\$303.5	\$336.8	\$363.4

The CFPB will attain its first goal by achieving the following three objectives:

Objective 1.1: Issue rules and guidance implementing Federal consumer financial law.

Objective 1.2: Supervise institutions to ensure compliance with Federal consumer financial laws.

Objective 1.3: Enforce Federal consumer financial laws to hold violators accountable and deter misconduct and repeat offenses.

Objective 1.1

Issue rules and guidance implementing Federal consumer financial law.

Primary objective leaders: Research, Monitoring, & Regulations Division

Strategies

The following strategies have been put in place to help the CFPB achieve objective 1.1.

- Pursue an efficient, transparent, inclusive, evidence-based approach to developing or revising regulations.
- Engage in rulemaking or other activities where appropriate to respond to emerging markets and products, changes in market conditions, innovation, or market failures that present consumer harm or hinder a fair, transparent, and competitive marketplace.
- Engage in rulemaking where appropriate to address outdated regulations.
- Provide financial institutions, service providers, and other stakeholders with guidance, tools, and other resources to support implementation and compliance with consumer financial protection laws and promote diversity and inclusion best practices.
- Promulgate regulations required by statute, specifically per Dodd-Frank Act § 1071 and § 1033.

Performance Measures

The CFPB will assess the progress on achieving objective 1.1 through the following performance measures:

MEASURE 1.1.1: PERCENT OF NOTICE-AND-COMMENT RULEMAKINGS COMPLETED WITHIN TWO YEARS OF ANNOUNCEMENT IN THE UNIFIED AGENDA

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						Baseline	75%	75%
Actual						100%	TBD	TBD

MEASURE 1.1.2: PERCENT OF RULES WITH STATUTORY DEADLINES COMPLETED WITHIN STATUTORY OR OTHER REQUIRED DEADLINE

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						100%	100%	100%

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Actual						100%	TBD	TBD

Progress update and future action

The CFPB continues to maintain an active rulemaking agenda, with the Office of Regulations developing regulations and interpretive guidance to implement directives contained in the CFPB’s enacting legislation and the federal consumer financial laws. The Office of Regulations is also developing new rules to address practices identified through the CFPB’s enforcement, supervision, market monitoring, research, and consumer response activities, and developing materials and participating in activities to facilitate compliance with regulatory changes and requirements. As laid out in further detail in the CFPB’s fall 2023 regulatory agenda, the CFPB is currently in the pre-rule or proposed rule stage for many rulemaking actions, with seven entries listed on the fall agenda. The CFPB anticipates publishing several of the proposed rules in FY 2024 and anticipates timely finalization of the rules. The regulatory agenda also includes five rules in the final rule stage and expects to finalize four of the rules during FY 2024.

For Measure 1.1.1, the CFPB considered notice and comment rulemakings completed during FY 2023 and calculated satisfaction of this metric based on when the proposed rule publication target was first announced in the Unified Agenda. The only rule that fell within this category for FY 2023 was the CFPB’s Small Business Lending Under Equal Credit Opportunity Act (Regulation B), which successfully met this target. Regarding Measure 1.1.2, there were no statutory deadlines applicable during FY 2023. The CFPB also considers court ordered deadlines as falling within this measure. The CFPB had one court ordered deadline during FY 2023, related to its Small Business Lending Under Equal Credit Opportunity Act (Regulation B) rule, and it met this deadline.

Objective 1.2

Supervise institutions to ensure compliance with Federal consumer financial laws.

Primary objective leader: Supervision, Enforcement, & Fair Lending Division

Strategies

The following strategies have been put in place to help the CFPB achieve objective 1.2.

- Acquire and analyze qualitative and quantitative information and data pertaining to consumer financial products and service markets and companies for examining for compliance with federal consumer financial laws.
- Focus supervision resources on institutions and their product lines that pose the greatest risk to consumers based on the nature of the harm, nature of the product, field and market intelligence, and the size of the institution and product line.
- Focus supervision resources on institutions and their product lines that pose the greatest risk to consumers.
- As appropriate, share information, coordinate activity, and promote best practices with fellow supervisory agencies to ensure the most effective use of regulatory resources.
- Mitigate risks to consumers through assessing the compliance management systems of supervised institutions.
- Promote development and enhancement of tools, processes, and methods to identify potential violations and to ensure compliance with federal consumer financial laws.
- Enhance internal policies, procedures, and systems that facilitate the effectiveness of the CFPB’s supervision function.
- Coordinate fair lending activities to ensure fair, equitable, and non-discriminatory access to credit for both individuals and communities.

Performance Measures

The CFPB will assess the progress on achieving objective 1.2 through the following performance measures:

MEASURE 1.2.1: NUMBER OF ALL SUPERVISORY EVENTS WITH SIGNIFICANT ACTIVITY WITH AN ON-SITE DATE OR EQUIVALENT DATE DURING THE PERIOD, INCLUDING FAIR LENDING

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target		Baseline	Baseline	420	420	420	450	450
Actual		477	768	553	587	606	TBD	TBD

MEASURE 1.2.2: NUMBER OF FAIR LENDING SUPERVISION EVENTS OPENED DURING THE FISCAL YEAR¹¹

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target					Baseline	25	25	25
Actual					37	33	TBD	TBD

MEASURE 1.2.3: PERCENT OF EXAMINATION REPORTS OR LETTERS ISSUED WITHIN THE CFPB'S ESTABLISHED TIME PERIODS FOLLOWING THE FINALIZATION OF EXAM ANALYSIS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	70%	70%	70%	70%	70%	70%	80%	80%
Actual	45%	71%	92%	91%	89%	93%	TBD	TBD

Progress update and future action

The CFPB continued to implement its supervision program through expanded use of different types of supervisory events, allowing Supervision to better allocate resources to events according to the level of effort required to complete them. The exam schedule for FY 2023 was informed by strategic priorities for all areas of compliance taking into account risk assessments across markets and for each institution. Although Supervision will continue to expand its use of different types of supervisory events, the CFPB does not expect the number of supervisory events to increase from FY 2024. The number of supervisory events that Supervision conducts each fiscal year is heavily dependent on examiner staffing levels, which is not expected to increase. As a result, Supervision is not increasing its targets for FY 2025.

The CFPB also continues to focus on issuing high quality examination reports and supervisory letters in a timely manner at the conclusion of exam events. The CFPB will review and analyze its processes to determine methods for improvement and increased effectiveness and efficiency. The CFPB intends to remain transparent about the goals of its supervision program and the steps being taken to achieve those goals, while protecting the confidentiality of the underlying financial institution-specific information. Supervision increased its timeliness target for FY2024 based on past performance and will maintain that target in FY2025.

¹¹ This indicator (1.2.2) includes MRA follow-up reviews starting in FY 2015. In addition, this indicator counts mortgage Targeted ECOA Exams and their associated HMDA Data Integrity Exams separately as two examinations. The overall supervision activities indicator combines mortgage Targeted ECOA Exams and their associated HMDA Data Integrity Exam as a single examination.

Objective 1.3

Enforce federal consumer financial laws to hold violators accountable and deter misconduct and repeat offenses.

Primary objective leader: Supervision, Enforcement, & Fair Lending Division

Strategies

The following strategies have been put in place to help the CFPB achieve objective 1.3.

- Focus enforcement resources on entities and individuals to best ensure the CFPB's enforcement function effectively protects consumers, prevents harm, and is applied consistently, including:
 - Addressing unlawful conduct by dominant market actors, including very large entities and entities that exploit a lack of consumer choice;
 - Addressing the lack of consumer access and recourse from financial entities as well as the imposition of junk fees;
 - Addressing repeat offenders, obtaining remedies that effectively deter unlawful conduct, and ensuring compliance with orders the CFPB obtains or issues;
 - Addressing unlawful conduct that affects minority and traditionally underserved communities; and
 - Addressing unlawful conduct in emerging markets and products and stemming from evolving reliance on technology, automation, and data.
- As appropriate, share information, coordinate activity, and promote best practices with fellow government agencies to ensure the most effective use of enforcement resources.
- Promote development and enhancement of technology, tools, processes, and methods to identify potential violations and to ensure compliance with Federal consumer financial laws.
- Enhance internal policies, procedures, and systems that facilitate the effectiveness of the CFPB's enforcement function.
- Deliver monetary relief to eligible harmed consumers in an efficient and transparent manner.

Performance Measures

The CFPB will assess the progress on achieving objective 1.3 through the following performance measures:

MEASURE 1.3.1: PERCENT OF INVESTIGATIVE INFORMATION SHARED WITH PARTNERS WITHIN 30 DAYS, ONCE INFORMATION SHARING IS APPROVED BY LEGAL/SEFL FRONT OFFICE

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target		90%	90%	90%	90%	90%	90%	90%
Actual		98% ¹²	100%	89%	100%	78%	TBD	TBD

MEASURE 1.3.2: PERCENTAGE OF ENFORCEMENT ACTIONS FILED OR SETTLED WITHIN TWO YEARS OF THE INVESTIGATION OPENING

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	65%	65%	65%	65%	65%	65%	N/A ¹³	N/A
Actual	62%	36%	56%	38%	32%	22%	N/A	N/A

MEASURE 1.3.3: AVERAGE DURATION, IN MONTHS, TO FILE OR SETTLE INVESTIGATIONS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	24	24	24	24	24	24	N/A	N/A
Actual	26	32	29	31	34	35	N/A	N/A

MEASURE 1.3.4: TOTAL AMOUNT OF CONSUMER RELIEF ORDERED AS A RESULT OF PUBLIC ENFORCEMENT ACTIONS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target				No Target	No Target	No Target	No Target	No Target
Actual				\$968M	\$499M	\$4,979M	TBD	TBD

MEASURE 1.3.5: TOTAL AMOUNT OF CIVIL MONEY PENALTIES ORDERED AS A RESULT OF PUBLIC ENFORCEMENT ACTIONS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target				No Target	No Target	No Target	No Target	No Target

¹² This measure includes information collected in the last two quarters of FY 2019.

¹³ This measure, in addition to 1.3.3, is being reevaluated given additional information gained since established. Targets are not being set for FY 2024 and FY 2025 for measures 1.3.2 and 1.3.3 until this evaluation is complete.

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Actual				\$251M	\$265M	\$2,114M	TBD	TBD

MEASURE 1.3.6: PERCENTAGE OF ALL CASES CONCLUDED BY THE CFPB'S ENFORCEMENT PERSONNEL THAT WERE SUCCESSFULLY RESOLVED THROUGH LITIGATION, A SETTLEMENT, OR ISSUANCE OF A DEFAULT JUDGEMENT

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	N/A	75%	75%	75%	75%	75%	75%	75%
Actual	88%	100%	100%	100%	100%	96%	TBD	TBD

MEASURE 1.3.7: PERCENTAGE OF ALL FAIR LENDING CASES CONCLUDED BY THE CFPB THAT WERE SUCCESSFULLY RESOLVED THROUGH LITIGATION, A SETTLEMENT, ISSUANCE OF A DEFAULT JUDGEMENT, OR OTHER MEANS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target					75%	75%	75%	75%
Actual					100%	N/A ¹⁴	TBD	TBD

Progress update and future action

During FY 2023, the CFPB initiated 22 public enforcement actions and successfully concluded seven previously filed public enforcement actions through litigation, a settlement, or default judgment.

The CFPB also published the approximate total amount of ordered consumer relief resulting from public enforcement actions as well as the total amount of ordered civil money penalties. In FY 2023, the CFPB obtained orders requiring nearly \$5 billion in consumer relief and more than \$2 billion in civil money penalties. Publishing these totals allows the public to track these amounts on an annual basis more readily.

Timely initiation of a public enforcement action better enables the CFPB to stop potentially unlawful conduct and more quickly redress harmed consumers. The CFPB continues to take steps to ensure enforcement is progressing in a timely manner to aid in improving on these timeframes in upcoming years. The CFPB is also reevaluating these metrics and their targets to

¹⁴ The CFPB did not file any fair lending actions in FY 2023.

ensure they are appropriate given additional information gained since these metrics were established.

The CFPB is also expanding the CFPB's enforcement capacity by increasing staff to allow the CFPB to timely investigate and take actions to address potential violations of Federal consumer financial laws; oversee, manage, and prioritize the CFPB's enforcement work; and effectively support ongoing investigatory and litigation work.

Goal 2: Empower consumers to live better financial lives, focusing on traditionally underserved people

BUDGET BY STRATEGIC GOAL 2 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2023	FY 2024	FY 2025
Office of the Director	\$13.7	\$16.6	\$18.2
Operations	\$12.2	\$7.6	\$7.8
Consumer Response and Education	\$0.0	\$22.4	\$23.1
Consumer Education and External Affairs	\$56.4	\$0.0	\$0.0
Research, Monitoring, and Regulations	\$6.2	\$10.0	\$10.5
Supervision, Enforcement, and Fair Lending	\$0.0	\$0.0	\$0.0
Legal	\$0.2	\$0.4	\$0.4
External Affairs	\$0.0	\$12.0	\$12.6
Other Programs	\$0.8	\$1.0	\$1.3
Centralized Services	\$2.5	\$2.7	\$2.8
Total	\$92.0	\$72.8	\$76.7

The CFPB will attain its second goal by achieving the following three objectives:

Objective 2.1: Engage with consumers, directly and through trusted partners, to provide information, guidance, and technical assistance regarding consumer financial products and services.

Objective 2.2: Collect consumers' inquiries and complaints, and work to ensure companies offering consumer financial products and services provide responses to consumers' complaints.

Objective 2.3: Expand the CFPB's reach and build relationships with external stakeholders and government partners to amplify relevant tools, messages, and resources.

Objective 2.1

Engage with consumers, directly and through trusted partners, to provide information, guidance, and technical assistance regarding consumer financial products and services.

Primary objective leaders: Consumer Education & External Affairs Division¹⁵

Strategies

The following strategies have been put in place to help the CFPB achieve objective 2.1.

- Expand and diversify CFPB’s reach nationwide through a data-driven process using economic activity, markets, experiences of historically underserved populations, and policy initiatives.
- Implement a targeted engagement and outreach strategy to tribal, rural, limited English proficient, and other underserved communities to inform the CFPB’s work and to build awareness of the CFPB’s mission, tools, and resources to drive better outcomes to the American people.
- Identify new opportunities to improve consumer knowledge, financial capability, and access to products and services through consumer education and engagement, policy changes, and implementation of effective practices.

Performance Measures

The CFPB will assess the progress on achieving objective 2.1 through the following performance measures:

MEASURE 2.1.1: NUMBER OF OFFICE OF STAKEHOLDER MANAGEMENT (OSM)-FACILITATED ENGAGEMENTS FOR CFPB OFFICIALS AND EXTERNAL STAKEHOLDERS (E.G., ROUNDTABLES, LISTENING SESSIONS, SITE VISITS, AND SPEECHES)

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target		12	25	25	25	25	75	75
Actual		267	41	47	55	106	TBD	TBD

¹⁵ In FY 2024, the Consumer Education & External Affairs Division split to form the External Affairs Division and the Consumer Response & Education Division.

MEASURE 2.1.2: NUMBER OF HEARINGS/TOWN HALLS ORGANIZED BETWEEN CFPB OFFICIALS AND THE PUBLIC

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target		4	4	3	3	3	3	3
Actual		4	5	4	3	3	TBD	TBD

MEASURE 2.1.3: PERCENT INCREASE IN FOLLOWERS ACROSS ALL OF THE CFPB'S SOCIAL MEDIA CHANNELS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						5%	5%	5%
Actual						9.58%	TBD	TBD

MEASURE 2.1.4: NUMBER OF PEOPLE WHO USE THE CFPB'S EDUCATIONAL RESOURCES ON WEB AND IN PRINT

	FY 2018	FY 2019	FY 2020 ¹⁶	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	8.7M	8.0M	9.0M	10.0M	10.0M	12.0M	12.5M	12.5M
Actual	9.9M	12.3M	16.1M	19.1M	21.5M	24.3M	TBD	TBD

Progress update and future action

The CFPB continues to work to reach stakeholders in diverse geographic locations and engage them in different formats. The CFPB continues to achieve excellent outreach by collaborating closely within the agency and with external partners to inform the CFPB's initiatives and maximize the impact of the CFPB's resources on the public.

The focus of financial education in FY 2024 will be to help consumers understand and assert their rights, avoid pitfalls, and take action when faced with financial difficulties. The CFPB strives to be a source for objective information and, where appropriate, seeks partnerships that can provide neutral and unbiased financial education programs. We continue to highlight our

¹⁶ Measure updated to incorporate web users of COVID-19 response resources into total count of web users accessing consumer educational resources. In the fiscal year 2020 report, the web users accessing COVID-19 response resources were reported separately.

financial well-being research, with the five principles of effective financial education¹⁷ that together offer a holistic framework for the wide variety of financial education strategies aimed at boosting financial well-being for adults. The principles are described below and are currently being refined with additional empirical data.

- *Know the individuals and families to be served.* Financial education programs can be more effective if they are matched to people’s specific circumstances, challenges, and goals.
- *Provide actionable, relevant, and timely information.* People are more likely to absorb information if it is connected to an upcoming decision that matters to them, at the time when they can put it to use, and with concrete steps that they can follow.
- *Improve key financial skills.* Key skills include knowing when and how to find reliable information to make financial decisions, how to process the information, and how to follow through.
- *Build on motivation.* Financial education can help people to strengthen the qualities and attitudes that allow them to remain motivated.
- *Make it easy to make good decisions and take action.* The situations that people encounter can strongly influence their actions. Effective financial education helps people to follow through on their intentions by working with the influences or forces at play within their lives.

Objective 2.2

Collect consumers’ inquiries and complaints, and work to ensure companies offering consumer financial products and services provide responses to consumers’ complaints.

Primary objective leader: Consumer Education & External Affairs Division¹⁸

Strategies

The following strategies have been put in place to help the CFPB achieve objective 2.2.

- Answer consumers’ questions about consumer financial products and services and provide updates on their complaints.

¹⁷ Effective financial education: Five principles and how to use them, CFPB, June 2017.

¹⁸ In FY 2024, the Consumer Education & External Affairs Division split to form the External Affairs Division and the Consumer Response & Education Division.

- Support timely responses to consumers’ complaints by efficiently sending complaints to companies.

Performance Measures

The CFPB will assess the progress on achieving objective 2.2 through the following performance measures:

MEASURE 2.2.1: PERCENTAGE OF CONSUMERS SATISFIED WITH TELEPHONE EXPERIENCE

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	Baseline	90%	90%	90%	90%	90%	90%	90%
Actual	91.7%	91%	92%	92%	94.5%	94.3%	TBD	TBD

MEASURE 2.2.2: NUMBER OF DAYS TO ROUTE COMPLAINTS TO COMPANY

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	2 days	2 days	2 days	2 days	2 days	2 days	2 days	2 days
Actual	<1 day	1 day	1 day	<1 day	<1 day	<1 day	TBD	TBD

MEASURE 2.2.3: PERCENTAGE OF COMPANY RESPONSES THAT ARE TIMELY

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	97%	97%	97%	97%	97%	97%	98%	98%
Actual	99%	99%	99%	99%	99%	99%	TBD	TBD

MEASURE 2.2.4: PERCENT OF COMPANIES ANALYZED ON RESPONSE PERFORMANCE (ABOVE THRESHOLD)

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	78%	82%	83%	85%	85%	85%	85%	85%
Actual	90%	100%	98%	97%	95.6%	96.2%	TBD	TBD

Progress update and future action

The CFPB answers consumer questions about consumer financial products and services, as well as provides updates about complaints, by telephone. The CFPB’s Office of Consumer Response

operates a statutorily mandated toll-free number to answer consumers' questions and intake consumer complaints. This contact center also processes, routes, and responds to consumer correspondence. Consumer Response measures consumers' satisfaction with their telephone experiences with the contact center. In FY 2023, 94.3% of respondents rated their experience with the contact center as satisfactory.

The CFPB collects, investigates, responds to, and analyzes consumer complaints. The Office of Consumer Response provides secure portals for consumers to track the status of their complaints; for other government partners to review complaint information; and for companies to provide responses to complaints.

The CFPB supports timely response to consumer complaints by efficiently sending complaints to companies through the secure, web-based company portal. The CFPB uses this portal to route complaints to companies for review and response to protect consumer and company privacy. The portal includes a user-friendly interface that allows companies to receive, review, and respond to consumer complaints, and to access and analyze data associated with those complaints. Consumer Response reports the percentage of complaints that receive a timely response when routed through the company portal. In FY 2023, 99% of complaints routed to companies through the company portal received a timely response.

Analyzing consumer complaints helps the CFPB to regulate consumer financial products and services under existing federal consumer financial laws, enforce those laws judiciously, and educate consumers. Consumer Response's monitoring and analysis of consumer complaints and company responses inform the CFPB's use of its primary tools – education, regulation, supervision, and enforcement. Consumer Response also enhances the tools used to analyze consumer complaints and company responses to assess the accuracy, timeliness, and completeness of company responses.

Complaints play an integral role in how the CFPB uses its tools and provide transparency for the marketplace through the public Consumer Complaint Database. In 2023, the CFPB continued to support the data visualization and trend analytics tools in the database, making it easier for consumers, researchers, advocates, and other stakeholders, including financial companies, to explore segments of the data in a clearer and more powerful interface.

Objective 2.3

Expand the CFPB's reach and build relationships with external stakeholders and government partners to amplify relevant tools, messages, and resources.

Primary objective leaders: Consumer Education & External Affairs Division¹⁹, Operations Division, Office of Fair Lending & Equal Opportunity, and Office of Minority & Women Inclusion

Strategies

The following strategies have been put in place to help the CFPB achieve objective 2.3.

- Enhance outreach and engagement with traditionally underserved communities and their intermediaries to gather market intelligence, consumer experiences, research, and policy recommendations that inform the CFPB’s work as well as share the CFPB’s policies and resources.
- Broaden and enhance outreach to intergovernmental partners with a particular focus on legislative bodies and local governments on the CFPB’s mission, authorities, and resources.
- Engage diverse external stakeholders, improve operational functions, and consumer-facing tools to achieve an inclusive and sustainable financial marketplace.
- Develop relationships with government entities, private industry, fair lending, civil rights, and consumer and community advocates, and academics, to promote fair lending compliance and education and hear their views to inform the CFPB’s policy development pertaining to CFPB priorities.
- Provide supplier diversity training and engage diverse contractors to increase opportunities and participation of minority- and women-owned businesses in CFPB programs and contracts.

Performance Measures

The CFPB will assess the progress on achieving objective 2.3 through the following performance measures:

MEASURE 2.3.1: NUMBER OF NEW COLLABORATIONS AND PARTNERSHIPS ESTABLISHED WITH THE CFPB

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target		2	3	3	3	100	50	50
Actual		2	6	104	197	151	TBD	TBD

¹⁹ In FY 2024, the Consumer Education & External Affairs Division split to form the External Affairs Division and the Consumer Response & Education Division.

MEASURE 2.3.2: NUMBER OF OUTREACH EVENTS WHERE THE CFPB STAFF WORK DIRECTLY WITH EXTERNAL STAKEHOLDERS TO (1) PROMOTE FAIR LENDING COMPLIANCE AND ENSURE FAIR, EQUITABLE, AND NON-DISCRIMINATORY ACCESS TO CREDIT AND/ OR (2) HEAR THEIR VIEWS ON THE CFPB'S WORK TO INFORM THE CFPB'S POLICY DECISIONS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	40	40	40	40	50	50	60	60
Actual	24	63	96	267	128	124	TBD	TBD

MEASURE 2.3.3: PERCENT OF THE CFPB'S TOTAL CONTRACTING SPEND PAID TO MINORITY- AND WOMEN-OWNED BUSINESSES

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target					12.8%	30%	35%	36%
Actual					35%	41.1%	TBD	TBD

Progress update and future action

The CFPB complies with the requirements under the Federal Advisory Committee Act and continues to accomplish its reporting goals. The CFPB understands the importance of expanding outreach efforts to underserved communities and diverse geographic locations and collaborates across divisions and with external stakeholders to fulfill this objective. Additionally, the CFPB continues to reach new stakeholders on important topics.

The Office of Minority and Women Inclusion (OMWI) and the Office of Finance and Procurement will continue co-hosting technical assistance events to increase participation opportunities for Minority and Women-Owned Businesses (MWOBs) and promote the CFPB's upcoming contractual needs. During these outreach events, procurement and program office professionals actively engage current and potential MWOBs by providing expert advice on procurement matters. Throughout the year, OMWI's collaborator and strategic partner, the Office of Procurement and Finance, successfully implemented a campaign to grow the Supplier Diversity vendor repository. Powered by registration for OMWI's Doing Business with Us events, together the two offices nearly tripled the number of interested vendors available for market research, from around 400 to over 1,100. Coupled with some first-time FY 2023 outreach touching on underserved populations, OMWI enhanced two key stakeholder support pillars: market research/capabilities matching and technical assistance to vendors.

Finally, limited English proficient (LEP) consumers often encounter significant barriers to participating in the consumer financial marketplace, including completing key financial documents, managing bank accounts, resolving problems with financial products, and accessing

financial education. This makes it difficult for LEP consumers to conduct everyday financial affairs and makes them more vulnerable to deceptive products or predatory actors. One of the CFPB's goals is to give consumers practical and actionable information to improve their decision-making in pursuit of their own financial goals. For the LEP community, this includes access to consumer financial education materials in consumers' native languages. To this end, the CFPB conducted in language focus groups, user testing, and practitioner interviews to gather feedback on improving access to the CFPB's digital resources and materials in Arabic, Chinese, Haitian Créole, Korean, Russian, Spanish, Tagalog, and Vietnamese. Through this consumer experience gathering, the CFPB will update our in-language home pages as well as expand additional translated resources.

Goal 3: Inform public policy with data-driven analysis on consumers’ experiences with financial institutions, products, and services

BUDGET BY STRATEGIC GOAL 3 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2023	FY 2024	FY 2025
Office of the Director	\$0.8	\$0.6	\$0.7
Operations	\$17.9	\$22.6	\$23.1
Consumer Response and Education	\$0.0	\$38.7	\$40.6
Consumer Education and External Affairs	\$19.6	\$0.0	\$0.0
Research, Monitoring, and Regulations	\$47.1	\$47.3	\$49.7
Supervision, Enforcement, and Fair Lending	\$0.0	\$0.0	\$0.0
Legal	\$0.8	\$2.6	\$2.9
External Affairs	\$0.0	\$4.8	\$5.0
Other Programs	\$0.5	\$0.7	\$0.8
Centralized Services	\$1.9	\$1.9	\$1.9
Total	\$88.6	\$119.2	\$124.6

The CFPB will attain its third goal by achieving the following two objectives:

Objective 3.1: Monitor consumer financial markets to surface relevant trends and identify areas of risk to consumers.

Objective 3.2: Conduct and publish research focused on: (a) experiences of underserved communities and their access to credit, (b) consumer awareness, understanding, and behavior with respect to consumer financial products and services and with respect to disclosures and related communications, and (c) market developments impacting consumers, including competition and innovation.

Objective 3.1

Monitor consumer financial markets to surface relevant trends and identify areas of risk to consumers.

Primary objective leader: Research, Monitoring, & Regulations Division

Strategies

The following strategies have been put in place to help the CFPB achieve objective 3.1.

- Effectively monitor consumer financial markets for risks to consumers.
- Acquire, collect, and maintain the data and other intelligence necessary to effectively monitor markets for risks to consumers.
- Ensure CFPB policy development and other functions are informed by the latest market developments and trends.
- Amplify the experiences of consumers in support of the CFPB’s policy development; understand special populations’ challenges in the financial marketplace; and integrate consumer experiences into our monitoring and risk identification.
- Analyze consumer complaints and share data and insights to identify areas of risk to consumers.

Performance Measures

The CFPB will assess the progress on achieving objective 3.1 through the following performance measures:

MEASURE 3.1.1: NUMBER OF REPORTS, ISSUE BRIEFS, ADVISORIES, OR OTHER ACTIONS TO INFLUENCE POLICY AND CONSUMER FINANCIAL MARKET PRACTICES

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						Baseline	30	30
Actual						30	TBD	TBD

MEASURE 3.1.2: MONTHLY AVERAGE NUMBER OF EXTERNAL ENGAGEMENTS FOCUSED ON COMPETITION OR EMERGING CONSUMER MARKET TRENDS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						Baseline	100	100

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Actual						91	TBD	TBD

Progress update and future action

The monitoring function in the Division of Research, Monitoring, & Regulations (RMR) is led by the Markets Offices, Consumer Populations Offices, and the Office of Competition and Innovation. These offices together monitor consumer financial product markets and embed the voices and experiences of consumers with market intelligence-gathering and risk monitoring.

The Market Offices regularly engage with industry stakeholders, perform data and risk analysis, and market research. The offices – Mortgage Markets; Consumer Credit, Payments, and Deposits; and Small Business Lending – each have staff with experience in consumer financial markets.

Market monitoring functions currently cover the following products and services:

- Artificial Intelligence and Machine Learning in Financial Services
- Auto Servicing and Originations
- Buy Now Pay Later
- Credit Card Origination and Servicing
- Consumer Reporting
- Consumer Data & Aggregation
- Debt Collection
- Debt Relief
- Deposits, Prepaid, & Payments
- Money Services and Remittances
- Mortgage Servicing and Origination
- Small Business Lending
- Small Dollar and Installment Lending (including Buy Now Pay Later)
- Student Loan Servicing and Originations

The Consumer Populations Offices focus on the unique experiences and needs of specific consumer populations. These populations include traditionally underserved consumers and those with low-incomes, students, young adults, older adults, servicemembers, and veterans. The offices gather and integrate insights about consumers' experiences in the financial marketplace into CFPB's work. These insights inform priority initiatives, identify emerging trends, and build foundational knowledge. A deeper understanding of consumers' experiences

helps the CFPB's education, supervision, enforcement, and rulemaking work to better achieve the CFPB's goals.

The Office of Competition and Innovation focuses on competition in financial services and identifying stumbling blocks for new market entrants. The Office engages with market participants and external parties to gather intelligence and to analyze obstacles to open markets.

During FY 2023, the CFPB published reports, issue briefs, advisories, and took other action across a variety of markets and affected consumer populations intended to influence policy and consumer financial market practices. Those actions informed policymaking in market areas such as medical debt, student lending, debt collection, and credit reporting; and in consumer populations including students and young consumers, older Americans, servicemembers, veterans, rural populations and others.

Objective 3.2

Conduct and publish research focused on: (a) experiences of underserved communities and their access to financial services, (b) consumer awareness, understanding, and behavior with respect to consumer financial products and services and with respect to disclosures and related communications, and (c) market developments impacting consumers, including competition and innovation.

Primary objective leader: Research, Monitoring, & Regulations Division

Strategies

The following strategies have been put in place to help the CFPB achieve objective 3.2.

- Research, analyze, and report on developments in markets for consumer financial products and services that apply to and contribute directly to policies that promote consumer and household financial well-being for all.
- Collect and disseminate data to inform research and improve understanding of consumer finances.
- Research inclusion and financial security challenges and barriers of servicemembers, older Americans, students, and traditionally underserved consumers and communities.

Performance Measures

The CFPB will assess the progress on achieving objective 3.2 through the following performance measures:

MEASURE 3.2.1: NUMBER OF PUBLISHED RESEARCH PRODUCTS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	6	7	10	10	15	18	18	18
Actual	10	13	17	24	25	42	TBD	TBD

MEASURE 3.2.2: NUMBER OF CITATIONS OF CFPB RESEARCH PRODUCTS IN OTHER PUBLICATIONS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	Baseline	75	140	160	350	400	400	400
Actual	73	121	214	353	364	335	TBD	TBD

MEASURE 3.2.3: NUMBER OF NEW DATA SERIES OR SETS RELEASED

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	1	1	1	1	1	1	1	1
Actual	2	3	2	0	0	1	TBD	TBD

Progress update and future action

The CFPB conducts research on consumer decision-making, consumer financial products and markets, and the effects of consumer financial regulations and policies. Publishing research products is central to the CFPB’s mission and the CFPB is statutorily required to research, analyze, and report on six topic areas related to consumer finance:²⁰

- Developments in markets for consumer financial products or services, including market areas of alternative consumer financial products or services with high growth rates and areas of risk to consumers;

²⁰ As set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203 (2010), Dodd-Frank 1013(b).

- Access to fair and affordable credit for traditionally underserved communities;
- Consumer awareness, understanding, and use of disclosures and communications regarding consumer financial products or services;
- Consumer awareness and understanding of costs, risks, and benefits of consumer financial products or services;
- Consumer behavior with respect to consumer financial products or services, including performance on mortgage loans; and
- Experiences of traditionally underserved consumers, including un-banked and under-banked consumers.

In FY 2023, CFPB published the following types of research through blogs, data spotlights, issue spotlights, markets and industry reports, and other reports. The CFPB conducted research in the following areas: banking and credit access, buy now pay later, credit cards, medical debt, the mortgage market, overdraft and non-sufficient funds fees, payment systems, rental housing markets, student lending, small business lending, and tenant/rental background screening.

On an ongoing basis, the CFPB releases data to the public, including updates to existing data resources and new data sets. Below are examples of the CFPB's ongoing data releases.

- On behalf of the FFIEC, the CFPB makes certain Home Mortgage Disclosure Act (HMDA) data available to the public and publishes various online tools for users to explore the data. HMDA data are the most comprehensive source of publicly available information on the U.S. mortgage market.
- Quarterly updates to the National Survey of Mortgage Origination (NSMO).
- The CFPB also makes available databases about credit cards, including general credit card agreements and college credit card marketing agreements, and credit card terms through the Terms of Credit Card Plans (TCCP) survey. In FY 2023, CFPB improved the survey to include more granular information about credit card interest rates. The CFPB's existing credit card resources include:
 - A database of credit card agreements from more than 600 card issuers.
 - Credit card issuers marketing agreements with universities, colleges, or affiliated organizations such as alumni associations, sororities, fraternities, and foundations.
 - A survey of the terms of credit card plans offered by 150 financial institutions.

Goal 4: Foster operational excellence and further commitment to workforce equity to advance the CFPB’s mission

BUDGET BY STRATEGIC GOAL 4 BY PROGRAM (\$ IN THE MILLIONS AND ROUNDED)

Division or Office	FY 2023	FY 2024	FY 2025
Office of the Director	\$7.9	\$7.6	\$7.9
Operations	\$181.0	\$199.2	\$208.9
Consumer Response and Education	\$0.0	\$0.0	\$0.0
Consumer Education and External Affairs	\$0.0	\$0.0	\$0.0
Research, Monitoring, and Regulations	\$0.0	\$0.0	\$0.0
Supervision, Enforcement, and Fair Lending	\$0.0	\$0.0	\$0.0
Legal	\$14.5	\$15.8	\$17.1
External Affairs	\$0.0	\$0.0	\$0.0
Other Programs	\$1.6	\$1.9	\$2.1
Centralized Services	\$7.6	\$9.6	\$9.9
Total	\$212.5	\$234.1	\$245.9

The Operations Division has worked to build an infrastructure that supports execution of the CFPB’s mission to make consumer financial markets work for consumers, responsible providers, and the economy as a whole. The CFPB has implemented and adopted policies, processes, tools, and controls to operate more efficiently, effectively, and transparently, while remaining adaptable in a continually changing environment. The CFPB will attain its fourth goal by achieving the following three objectives:

Objective 4.1: Cultivate an engaged and informed workforce to maximize talent and development in alignment with the CFPB’s mission.

Objective 4.2: Define and implement a modern, forward-leaning workplace model that is responsive to the CFPB’s organizational needs.

Objective 4.3: Advance the work of the CFPB through innovative and optimized operational support.

Objective 4.1

Cultivate an engaged and informed workforce to maximize talent and development in alignment with the CFPB’s mission.

Primary objective leaders: Operations Division, Legal Division, Office of Minority & Women Inclusion, and Office of Civil Rights

Strategies

The following strategies have been put in place to help the CFPB achieve objective 4.1.

- Strengthen the overall capability of the CFPB to identify key job skills and develop staff for CFPB continuity.
- Increase talent acquisition activities to meet the CFPB’s demands for a diverse, highly skilled, and effective workforce.
- Foster a positive, innovative work environment that promotes diversity, equity, integrity, inclusion, equality, accessibility, fairness, and trust for all employees.
- Review and redesign the skills and values we want in the CFPB’s employees and enhance our services to enable them to do their best work.
- Maintain comprehensive equal employment opportunity (EEO) and DEIA programs.

Performance Measures

The CFPB will assess the progress on achieving objective 4.1 through the following performance measures:

MEASURE 4.1.1: PERCENT OF EEO COUNSELING AND INVESTIGATIONS PROCESSED WITHIN REGULATORY TIMEFRAMES

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target					95%	95%	95%	95%
Actual					100%	100%	TBD	TBD

MEASURE 4.1.2: MANAGEMENT TRAINING SURVEY RATING ON APPLYING LEARNED SKILLS TO JOB RESPONSIBILITIES (AGGREGATE OF THREE QUESTIONS ON SEVEN POINT SCALE)

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	5.75	5.75	5.75	5.0	5.75	5.75	5.75	5.75

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Actual	6.4	6.5	6.34	6.26	5.70	6.20	TBD	TBD

MEASURE 4.1.3: INCLUSION QUOTIENT: ANNUAL EMPLOYEE SURVEY (AES) RATING ON PERCEPTIONS OF INCLUSION AND DIVERSITY

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	70%	70%	67%	67%	70%	71%	71%	71%
Actual	67.2%	66.6%	67%	72.7%	71%	73.4%	TBD	TBD

MEASURE 4.1.4: OPM EMPLOYEE ENGAGEMENT INDEX

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target			70%	70%	75%	75%	75%	75%
Actual			71.2%	79%	74%	76%	TBD	TBD

MEASURE 4.1.5: PERCENT OF THE CFPB'S ANNUAL ETHICS TRAINING PROGRAM THAT COMPLIES WITH THE OFFICE OF GOVERNMENT ETHICS REQUIREMENTS FOR TRAINING EMPLOYEES WHO FILE PUBLIC AND CONFIDENTIAL DISCLOSURE REPORTS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target		100%	100%	100%	100%	100%	100%	100%
Actual		100%	100%	100%	100%	100%	TBD	TBD

Progress update and future action

As part of a compensation reform effort, which the National Treasury Employees Union agreed to in December 2022, the CFPB completed a salary reset process in 2023 to better align employee salaries with experience and, thereby, promote pay equity, fairness, and transparency. In July 2022, the CFPB began the design and development of a new learning and development program for non-supervisory team members with an interest in developing skills necessary to become competitive for new supervisory job opportunities. The curriculum was completed in December 2023, and the new program will be implemented in the Spring of 2024.

In FY 2023, OMWI, with the support of CFPB stakeholders, conducted several programs and initiatives to advance diversity, equity, inclusion, and accessibility at the CFPB, including:

- **Supplier Diversity Training:** OMWI administered training regarding supplier diversity to contracting representatives and operations personnel throughout the CFPB. This training provides information regarding the CFPB’s small business goals and opportunities support small businesses and minority and women-owned businesses.
- **DEIA Training:** The mandatory diversity and inclusion training was completed by 75% of the CFPB’s workforce. By September 30, 2023, mandatory training had been delivered to 246 managers and 965 staff. The training, which focused on cultivating inclusive teams, was designed to provide substantive opportunities for discussion, practice, and collaboration within the CFPB workforce.
- **Leadership Development:** OMWI continues to partner with the Treasury Executive Institute (TEI) to bring leadership development and coaching opportunities to our most senior employees. Leaders at the CFPB who are equivalent to the GS-14/GS-15 or SES can attend live leadership training (in-person and online) and access on-demand webinars, videos, and articles. In FY24 these opportunities will be socialized more globally for supervisory staff members to attend.
- In FY23, CFPB saw 22% of staff participate in an Employee Resource Group (“ERG”). CFPB encourages participation in ERGs because they are critical to employee engagement, culture, and morale.

Similarly, the Office of Civil Rights (OCR) partnered with internal stakeholders such as OMWI and the Office of Human Capital on high-impact civil rights initiatives in FY 2023, including:

- Providing technical assistance on new and revised internal policies to monitor for civil rights and EEO impacts and embed non-discrimination and inclusion principles in all CFPB practices.
- Assisting the Operations Division/OHC in reviewing and updating the CFPB’s Leader Performance Standards for executives, managers of managers and first-line supervisors to include more in-depth EEO/DEIA standards, which went into effect in FY 2024.
- Conducting a one-day agency-wide EEO training for CFPB supervisors and managers covering everything from EEO laws, harassment and retaliation, the EEO process, alternative dispute resolution (ADR), and reasonable, religious and pregnancy accommodations.
- Continuing to monitor implementation of action-items identified in CFPB’s barrier analysis regarding experiences of African American and Hispanic/Latino/Latina employees and CFPB’s barrier analysis regarding persons with a disability or a targeted disability. Updates will be provided in the CFPB’s FY 2023 Management Directive 715 and Section 501 Affirmative Action Plan.

Objective 4.2

Define and implement a modern, forward-leaning workplace model that is responsive to the CFPB’s organizational needs.

Primary objective leaders: Operations Division, Office of Minority & Women Inclusion, and Office of Civil Rights

Strategies

The following strategies have been put in place to help the CFPB achieve objective 4.2.

- Ensure the CFPB’s facilities and workspaces align to the mission and needs of a hybrid workforce and promotes the well-being, safety, security, accessibility, and productivity of all employees.
- Enable the CFPB mission with secure data and technology solutions.
- Empower the CFPB’s workforce with secure tools that help staff be productive.
- Ensure that DEIA goals and priorities are developed and implemented; enforce federal civil rights laws and EEO regulations prohibiting workplace discrimination; maintain a robust Disability and Accessibility Program to ensure accessibility within the CFPB.
- Continue to foster a positive, innovative work environment that promotes diversity, equity, integrity, inclusion, and trust for all employees.

Performance Measures

The CFPB will assess the progress on achieving objective 4.2 through the following performance measures:

MEASURE 4.2.1: PERCENT OF CFPB FACILITIES THAT ARE COMPLIANT OR ACTIVE AGAINST INDUSTRY STANDARDS AND APPLICABLE FEDERAL GUIDANCE

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						100%	100%	100%
Actual						100%	TBD	TBD

MEASURE 4.2.2: PERCENT OF MAJOR FACILITIES AND SECURITY PLANS THAT ARE UP-TO-DATE

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						100%	100%	100%

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Actual						100%	TBD	TBD

Progress update and future action

The CFPB achieved the Fitwel Viral Response (renewed on April 30, 2023) and Fitwel Building (certified from February 14, 2022 to February 13, 2025) certificates for the 1700 G Street facility. These certificates demonstrate that the suite of health and safety strategies implemented at the 1700 G Street facility create a healthy and resilient environment for all of staff and visitors. The Fitwel Viral Response re-certification takes place annually and the Fitwel Building re-certification takes place every three years.

The CFPB conducted a thorough review and update of the CFPB’s Continuity of Operations Plan (COOP) and Pandemic Plan in late 2023. The COOP expanded the CFPB’s Mission Essential Functions (MEFs) from one to three. The MEFs now include: (1) the CFPB must handle consumer complaints in a timely manner; (2) the CFPB must execute time-sensitive financial enforcement proceedings and litigation to satisfy administrative and court requirements; and (3) the CFPB must execute time-sensitive consumer financial regulatory actions and satisfy court requirements related to CFPB regulations. The CFPB plans to conduct a COOP exercise in late 2024.

In FY 2023, the Disability and Accessibility Section (DAPS) continued to lead the progress of the disability and accessibility related goals in the DEIA Strategic Plan, worked with business units to ensure 508 compliance, and continued to drive forward a campaign to raise awareness and engage management in advancing accessibility at CFPB called “Elevate the A.” The CFPB provided funding resources to support technology improvements for accessibility and support services for reasonable accommodation. Progress was made on the disability barrier analysis action plan and updates will be provided in the CFPB’s FY 2023 Affirmative Action Plan.

In FY 2023, the CFPB delivered a major transformation of the Supervision and Examination System, enhanced cloud development, security, and operations (DevSecOps) capabilities, and expanded multifactor authentication. The CFPB also rapidly delivered multiple productivity applications, streamlining communication, reporting, and responsive handling of consumer concerns. Furthermore, the CFPB upheld its commitment to employee satisfaction and ensured a responsive and efficient employee experience by optimizing human resource service delivery and IT service desk operations. Finally, efforts to integrate collaboration tools with other regulatory bodies fostered communication and collaboration.

In FY 2024, the CFPB will elevate its cloud platform capabilities. The strategic focus includes leveraging citizen development for streamlined app creation, reducing technical debt on major platforms, and continued focus on DevSecOps. This will be complemented by continued collaboration efforts with other regulatory bodies, the advancement of project management capabilities, robust reporting and risk assessment, and a dedication to maintaining a customer-centric approach in addressing consumer concerns.

Objective 4.3

Advance the work of the CFPB through innovative and optimized operational support.

Primary objective leaders: Operations Division and Office of Civil Rights

Strategies

The following strategies have been put in place to help the CFPB achieve objective 4.3.

Strategies

- Provide easy to access data and analytics to the people who need it, when they need it to support data-driven decision-making, rulemaking, and oversight.
- Mature and embed cybersecurity best practices from inception with strategic planning, resource allocation and development of systems, policies, and processes.
- Align resources to CFPB's strategic priorities.
- Provide accurate, complete, and meaningful procurement and financial information to promote integrity and transparency to internal and external stakeholders.
- Provide efficient, transparent and well communicated mission support delivery to partners/stakeholders.
- Prioritize competition and increase participation of and awards to small business and MWOBs.
- Mature the Enterprise Risk Management (ERM) program, Internal Policies Program, and Audit Oversight Program to strengthen leadership decision-making and governance, align risk considerations with strategic planning, prioritization, and resource allocation, foster a risk-aware culture, and improve overall organizational performance.
- Execute the CFPB's Enterprise Data Strategy (EDS) and mature the Enterprise Data Management (EDM) program to ensure the CFPB's data and information are appropriately accessible by internal and external stakeholders and deliver value to inform leadership and decision-making.

- Conduct barrier analyses through the OCR and implement associated action items to eliminate identified barriers to equal employment opportunity.

Performance Measures

The CFPB will assess the progress on achieving objective 4.3 through the following performance measures:

MEASURE 4.3.1: PERCENTAGE OF CONTRACTS COMPETITIVELY AWARDED OVERALL

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	90%	90%	80%	80%	80%	80%	80%	80%
Actual	87.2%	82%	82.6%	83.5%	92.3%	89.3%	TBD	TBD

MEASURE 4.3.2: ACHIEVE OFFICE OF INSPECTOR GENERAL (OIG) MATURITY MODEL RATINGS OF LEVEL 4 (MANAGED & MEASURABLE) ACROSS MULTIPLE CYBERSECURITY FRAMEWORK AREAS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target		2 of 5 Areas	3 of 5 Areas	5 of 5 Areas	5 of 5 Areas	4 of 5 Areas	4 of 5 Areas	4 of 5 Areas
Actual		3 of 5 Areas	3 of 5 Areas	5 of 5 Areas	3 of 5 Areas	2 of 5 Areas	TBD	TBD

MEASURE 4.3.3: PERCENTAGE OF AUDIT FINDINGS CLOSED BY THE AUDITOR WITHIN TWO FISCAL YEARS

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target	Baseline	75%	80%	80%	80%	80%	80%	80%
Actual	65%	93%	78%	63%	75%	54%	TBD	TBD

MEASURE 4.3.4: PERCENT OF DATA SETS (STORAGE) THAT RESIDE IN THE CLOUD ENVIRONMENT

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Target						Baseline	43%	45%
Actual						43%	TBD	TBD

Progress update and future action

In FY 2023, the CFPB updated its agency-wide risk profile and risk appetite statement. The CFPB also conducted a comprehensive ERM maturity assessment which was used to inform program activity. To further mature ERM capabilities, the CFPB formalized governance for enterprise risk monitoring, continued to develop risk tolerances aligned to the risk appetite statement, and incorporated enterprise risk into the CFPB's Operating Reserve process. The CFPB maintained its overall level of ERM maturity at Level 3.

Over the past year, the CFPB has also successfully implemented its policy and processes for the management of internal policies, developed a policy library to facilitate employees' access to internal policies, and rolled out a campaign to align existing policies with the new guidance.

The CFPB continues to track, monitor, proactively report status, and address findings reported by its auditing entities (GAO, OIG, and the independent auditor of budget and operations). At the beginning of FY 2023, the CFPB had 74 open findings, and during this time three new findings were opened. At the end of FY 2023, 30 of the 74 open findings were closed by the auditors. The 15 closed findings reported represent items in which corrective actions have been implemented by the CFPB and the auditor has confirmed the findings have been resolved. In FY 2024, the CFPB will continue to track and remediate open findings on an ongoing basis.

In FY 2023, the CFPB's Information Security Program maintained an effective overall rating measured at the Level-4 (Managed and Measurable) maturity as determined by the Office of Inspector General's (OIG) scoring methodology. The new OIG methodology takes into consideration core and supplemental metrics when assessing the individual function areas (identify, protect, detect, respond, and recover). The overall program assessment relies primarily on the core metrics in determining overall maturity. Other factors considered in the audit include the results of cybersecurity evaluations, including system security control reviews, vulnerability scanning, and penetration testing conducted during the review period, along with an assessment of the progress agencies have made in addressing outstanding OIG recommendations and security incidents reported during the review period. As a result of the 2023 audit of CFPB's information security program, the OIG found that the CFPB's information security program overall continues to operate effectively at maturity model Level 4: Managed and Measurable. The OIG findings noted that CFPB continues to add automation to its information security continuous monitoring (ISCM) processes that will provide additional insights regarding risk management and incident response. In addition, the CFPB continues to strengthen its zero-trust architecture (ZTA) by incorporating strong authentication processes into its application management, including cloud-based services.

The Office of Technology and Innovation (T&I) in coordination with internal stakeholders continued to improve the areas of information security through continuous monitoring, supply chain risk management, and its efforts to meet the zero-trust architecture requirements. In FY 2024, T&I will coordinate with stakeholders across the Operations Division to implement improvements in the areas of supply chain risk management, configuration management, data protection and privacy, and identity and access management.

In FY 2023, the CFPB made significant progress in efforts to migrate applications and data from the legacy on-premises cloud infrastructure environment to the new cloud-native environment. The migration of 358 terabytes (TB) of data was completed from our on-premises physical storage environment to a fully cloud-based, collaborative workspace environment previously certified according to requisite security authorizations. A hybrid solution was developed to move data assets from on-premises database servers into cloud-based services. The CFPB also worked towards obtaining security authorization for the specific data services needed to complete the migration of database assets. In FY 2024, the CFPB plans to continue working with our Data and Research teams to identify and prioritize additional data assets currently maintained in the legacy on-premises physical storage for migration to the new cloud-native environment. Significant progress will be made in migrating these data assets throughout the year. Additionally, the process of obtaining security authorization for data services needed to complete the migration of database assets will be completed, allowing the finalization of plans for the migration of on-premises databases using appropriate cloud service providers. The CFPB also plans to complete the analysis of options for cloud migration of the Legal Enclave, which is a large and complex component of the overall CFPB data environment. Once the alternative selection for the Legal Enclave migration is selected, the CFPB will formalize and document the planned approach, and finalize a high-level milestone schedule.

OCR will continue to monitor the implementation of action items associated with ongoing barrier analysis efforts to eliminate identified barriers to equal employment opportunity. Progress will be reported annually in the CFPB's Management Directive (MD) 715 report and Affirmative Action Plan.

Appendix A: Historical Measures

The CFPB did not add any new performance measures for FY 2024 or retire any measures from FY 2023. For more information on historical measures, please consult [past Annual Performance Plans](#).

Appendix B: Data Validation

Following the CFPB's data accuracy and reliability processes and procedures, the CFPB takes continuous steps to ensure performance information is complete, accurate, and reliable. The following captures key efforts by Strategic Goal and specifically focuses on data sources, summarizes levels of accuracy and data verification approaches, and identifies data limitations along with compensatory counteractions.

Strategic Goal 1

Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers' needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination.

Objective 1.1

Issue rules and guidance implementing Federal consumer financial law.

- **Data sources:**
 - To measure performance for the measures under Objective 1.1, the CFPB relies on several data sources, including the Federal Register, www.regulations.gov, the CFPB's website, www.reginfo.gov, federal statutes, and court orders.
- **Level of accuracy and data verification:**
 - The Federal Register provides an accurate record of all CFPB notice and comment rulemakings. The CFPB's website also provides an extensive record of publications, including rulemakings, issued by the CFPB. The Office of Management and Budget publishes each edition of the Unified Agenda on reginfo.gov.
- **Advantages, limitations, and mitigating actions:**
 - An advantage of measure 1.1.1 is that OMB provides guidance to agencies on listing rulemakings on the Unified Agenda.
 - With respect to performance mitigation for the measure 1.1.2, no significant data limitations are known.

Objective 1.2

Supervise institutions to ensure compliance with Federal consumer financial laws.

- **Data sources:**
 - The CFPB captures and stores data about its supervision events in its Supervision Examination System (SES). Metrics and measures for the performance goals in support of this objective are updated based on data housed in these systems on a biannual basis, followed by focused management reviews to assess progress toward achieving the CFPB's Strategic Goals and Objectives.
- **Level of accuracy and data verification:**
 - SES provides a streamlined workflow and data validation controls that have been developed to ensure consistent data quality. SES also allows tracking and reporting.
 - The CFPB provides training to users on proper use of SES to ensure data verification and validation.
 - Supervision runs a Quality Management Program that performs routine and ad-hoc data reviews and testing in SES to ensure understanding of data quality and inform data quality improvement activities when appropriate.
- **Advantages, limitations, and mitigating actions:**
 - Although the data is frequently reviewed for accuracy, Supervision continues to assess and improve its ability to track its supervision activities to best ensure it is accurately and consistently capturing supervision data.

Objective 1.3

Enforce Federal consumer financial laws to hold violators accountable and deter misconduct and repeat offenses.

- **Data sources:**
 - The CFPB captures and stores data about its enforcement matters in ENForce, its matter management system. Metrics and measures for the performance goals in support of this objective are updated based on data housed in these systems on a regular basis, followed by focused management reviews to assess progress toward achieving the CFPB's Strategic Goals and Objectives.

- **Level of accuracy and data verification:**
 - ENForce provides a streamlined workflow and data validation controls that have been developed to ensure consistent data quality. ENForce also allows tracking and reporting.
 - The CFPB provides training to users on the proper use of ENForce to ensure data verification and validation.

- **Advantages, limitations, and mitigating actions:**
 - Although the data is frequently reviewed for accuracy, Enforcement continues to assess and improve its ability to track its enforcement activities to best ensure it is accurately and consistently capturing enforcement data.

Strategic Goal 2

Empower consumers to live better financial lives, focusing on traditionally underserved people.

Objective 2.1

Engage with consumers, directly and through trusted partners, to provide information, guidance, and technical assistance regarding consumer financial products and services.

- **Data sources:**
 - The number of consumers served through Ask CFPB and other digital financial education tools, print publications, and downloads of tools, papers, and materials are based on Google Analytics data for unique users to consumerfinance.gov and print orders from the Government Publishing Office. Community partner data, such as number of staff trained and number of individuals served, is measured through CFPB databases as well as through reports from regional and local partners.
 - Web analytics for the CFPB website are the data source for reports dated between October 1, 2021, and September 30, 2022.
 - The CFPB maintains stakeholder engagement tracking databases.

- **Level of accuracy and data verification:**
 - The data sources listed above were reviewed to determine metrics related to all relevant final rules, proposed rulemakings, published reports, outreach and other

initiatives covered by the performance metrics. The website analytics are provided by Google Analytics 360, which provides numbers based on website user sessions.

- The stakeholder engagement information presented is dependent on accurate and consistent usage of the CFPB's stakeholder management tracking database.

- **Advantages, limitations, and mitigating actions:**

- If the CFPB's stakeholder management tracking database is not used on a consistent or accurate basis, then the information stored in the system would be limited.

Objective 2.2

Collect consumers' inquiries and complaints, and work to ensure companies offering consumer financial products and services provide responses to consumers' complaints.

- **Data sources:**

- The CFPB maintains a consumer response complaint management system.

- **Level of accuracy and data verification:**

- The Office of Consumer Response conducts regular data reviews and cross-checks accuracy for all key performance measures, including number of days to route to the company and percentage of company responses that are timely. The Office also tracks the proportion of complaints received via the web channel and the number of consumer complaints handled by the CFPB.

- **Advantages, limitations, and mitigating actions:**

- No data limitations are known.

Objective 2.3

Expand the CFPB's reach and build relationships with external stakeholders and government partners to amplify relevant tools, messages, and resources.

- **Data sources:**

- Measured using CFPB's Engagement Management System (eCRM).

- The Office of Finance and Procurement tracks competition and reporting data measurements on an annual basis and has developed a live dashboard of procurement metrics, including competition, small business and diversity, that is available to all CFPB employees.
- **Level of accuracy and data verification:**
 - The information presented is dependent on accurate and consistent usage of the CFPB's stakeholder management tracking database.
 - The Office of Finance and Procurement dashboard is regularly reviewed by staff for accuracy and the underlying data is the subject of multiple audits each quarter.
- **Advantages, limitations, and mitigating actions:**
 - If the CFPB's stakeholder management tracking database is not used on a consistent or accurate basis, then the information stored in the system would be limited.
 - The Office of Finance and Procurement dashboard tracks and reports competition, small business and diversity metrics using real-time data which is available to all CFPB employees via the Procurement Wiki page. Calculations are automated and fixed to avoid the need for repeated entry. Limitations involve data integrity as some fields in database require manual entry. This is monitored via the audits described in previous bullet.

Strategic Goal 3

Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services.

Objective 3.1

Monitor consumer financial markets to surface relevant trends and identify areas of risk to consumers.

- **Data sources:**
 - The CFPB website is the data source for the number of reports, issue briefs, advisories, or other actions. The actions to influence policy or consumer financial market practices is documented by CFPB staff from both internal sources. To count the average number of monthly engagements focused on innovation,

competition, or emerging consumer market trends, CFPB staff record their engagements with external parties in an online tracking tool.

- **Level of accuracy and data verification:**

- The CFPB website includes a full accounting of CFPB reports, issue briefs, advisories, or other actions. CFPB staff maintain a process of logging external engagement in the engagement tracking tool and information presented is dependent on accurate and consistent use of the tool.

- **Advantages, limitations, and mitigating actions:**

- With respect to the accounting of CFPB reports, issue briefs, advisories, or other actions, there are no limitations – all products are released externally via the CFPB website. The determination regarding actions to influence policy or consumer financial market practices is based on a determination by CFPB staff. To mitigate any issues regarding the accuracy of the data, the CFPB maintains internal documentation to make the determination. Regarding external engagements, there are limitations in the data in that staff must record engagements. The advantage to using such data is that this limitation could result in an undercount of engagements but would not result in overcounting.

Objective 3.2

Conduct and publish research focused on: (a) experiences of underserved communities and their access to credit, (b) consumer awareness, understanding, and behavior with respect to consumer financial products and services and with respect to disclosures and related communications, and (c) market developments impacting consumers, including competition and innovation.

- **Data sources:**

- The CFPB's website is the data source for reports along with the CFPB website of the Social Science Research Network (SSRN), a repository of scholarly research publications.²¹ The number of citations of CFPB reports and publications in external publications uses data compiled from Google Scholar, a tool to search

²¹ The CFPB maintains a site designated as a repository for independent research publications at <https://www.ssrn.com/index.cfm/en/cfpb-gov/>.

scholarly literature across research disciplines, SSRN, and Lexis-Nexis. Public engagement is tracked by CFPB staff.

- **Level of accuracy and data verification:**
 - The data sources listed above were reviewed to determine metrics related to all research publications. Google Scholar, SSRN, and Lexis-Nexis provide data on report citations, but does not include a full accounting of CFPB research material cited across varied publications.

- **Advantages, limitations, and mitigating actions:**
 - With respect to research products, there are no limitations – all products are released externally via the CFPB website. The sources for the number of citations – Google Scholar, SSRN, and Lexis-Nexis – there are potential limitations regarding whether those external systems capture the full range of existing citations. An advantage is that this limitation could result in an undercount of citations but would not result in overcounting.

Strategic Goal 4

Inform public policy with data-driven analysis on consumers' experiences with financial institutions, products, and services.

Objective 4.1

Cultivate an engaged and informed workforce to maximize talent and development in alignment with the CFPB's mission.

- **Data sources:**
 - AES results are captured through an online survey administered under an IAA for reimbursable government services offered by the OPM's Human Resources Solutions group. The IAA provides warranties that services provided for the AES meet professional and legal standards. OPM's USASurvey branded online survey administration tool is used to gather data. This tool is subject to the variety of information security guidelines for government information technology projects and systems. To ensure that all intended employees are invited to complete the annual employee survey, email addresses for the employee population are provided to OPM as the basis for survey invitation.

- Manager Training Applied Learning Metric results are captured through training classroom evaluations, administered during classroom training sessions. Data is then aggregated across multiple deliveries, and calculated for both the period, and cumulative for the fiscal year.
 - EEO counselings and investigations are captured through a case management tool called ETK EEO. ETK EEO access is limited to the Office of Civil Rights and allows the team to monitor regulatory timelines and ensure timely processing of complaints.
- **Level of accuracy and data verification:**
 - To verify data summaries for item and index level results, OPM provides independent verification and reporting of CFPB-wide AES results prior to releasing data to the CFPB. The CFPB's OHC, in partnership with the Office of Research (OR) and a vendor under contract for this effort, then conducts analysis and generate summary reports. All discrepancies between posted and calculated results are subject to 100% verification.
 - At a broader level of verification, comparison data from OPM for government-wide results is monitored and verified through data cross checking. In the final steps of survey processing, the CFPB posts results to external website and sends an internet link and posted results to OPM to meet regulatory guidance.
 - The Office of Civil Rights runs regular reports to verify data accuracy and ensure there are no errors and no missing data fields.
 - **Advantages, limitations, and mitigating actions:**
 - The CFPB continues to monitor and evaluate the reliability and validity of these metrics as additional baseline data become available. Adjustment to outcomes, components, or targets may be necessary as measures are better understood.

Objective 4.2

Define and implement a modern, forward-leaning workplace model that is responsive to the CFPB's organizational needs.

- **Data sources:**
 - The CFPB monitors the renewal dates of facilities and security certificates and plans to ensure they are up to date.
- **Level of accuracy and data verification:**

- The level of accuracy is high and data sources are verified once the certificate or plan is approved.
- **Advantages, limitations, and mitigating actions:**
 - No data limitations are known.

Objective 4.3

Advance the work of the CFPB through innovative and optimized operational support.

- **Data sources:**
 - The Office of Finance and Procurement tracks competition and reporting data measurements on an annual basis and has developed a live dashboard of procurement metrics, including competition, small business and diversity, that is available to all CFPB employees.
 - OIG Maturity Model ratings are taken from the Annual Audit Report issued by the OIG.
 - The migration of data to cloud-based data centers is calculated through the CFPB's network management tools, which can be used to run reports and consolidate information.
 - External auditors notify the CFPB when audit findings have been closed.
- **Level of accuracy and data verification:**
 - The Office of Finance and Procurement dashboard is regularly reviewed by staff for accuracy and the underlying data is the subject of multiple audits each quarter.
 - Federal Information Security Modernization Act of 2014 (FISMA) mandates the reporting of the information security posture for federal agencies through an annual audit conducted by the Office of the Inspector General (OIG). In fiscal year 2015, the Office of Management and Budget, the Department of Homeland Security, and the Council of the Inspectors General on Integrity and Efficiency established a maturation rating methodology to score the maturity and effectiveness of federal information security functions. These scores range from low to high with Level-1 (Ad-hoc), Level-2 (Defined), Level-3 (Consistently Implemented), Level-4 (Managed and Measurable) and Level-5 (Optimized). The OIG, since fiscal year 2017, has assessed the maturation of the CFPB's information security policies, procedures, and practices across five security domains, (Identify, Protect, Detect, Respond, and Recover) based on the National

Institute of Standards and Technology (NIST) Cybersecurity Framework in this rating model. In fiscal year 2022, the OIG added a new security function, Supply Chain Risk Management, which impacted the scoring of the Identify security domains.

- The CFPB can accurately calculate its footprint across on-premise data centers and can easily replicate those calculations.
- The Audit and Oversight team continuously monitors corrective action plans associated with findings released by external auditors, along with validating information published by external auditors throughout the year to ensure findings data is accurate and up to date. As part of this effort, the CFPB works towards closing audit findings within two years of issuance 80% of the time, which is calculated by tracking findings issued two years prior the current year.

- **Advantages, limitations, and mitigating actions:**

- The Office of Finance and Procurement dashboard tracks and reports competition, small business and diversity metrics using real-time data which is available to all CFPB employees via the Procurement Wiki page. Calculations are automated and fixed to avoid the need for repeated entry. Limitations involve data integrity as some fields in database require manual entry. This is monitored via the audits described in previous bullet.
- Calculating ratios of data storage in the new cloud-native environment as compared to the legacy on-premises environment can result in significant variability regarding the maximum achievable result, depending on a large extent as to how much data are decommissioned in the legacy environment. However, given that the total amount of data managed in both the new and legacy environments is comparable in size, prior to a large decommissioning of data in the legacy environment, the maximum obtainable value for measure 4.3.4 is likely to be near 50%. This is due to the nature of the calculation used for this measure, where the percent of data that reside in the new cloud environment is defined using the following formula:

$$\text{Percent of Data Storage} = \frac{[\text{Data Storage in New Environment}]}{[\text{Data Storage in New Environment}] + [\text{Data Storage in Legacy Environment}]}$$

Appendix C: Management Challenges

As identified by the CFPB's Office of the Inspector General, the CFPB faces management challenges in the areas of information security, human capital programs, supervision and enforcement strategy, and consumer complaints. As part of its ongoing, continuous improvement efforts, the CFPB is addressing these challenges.

1. Ensuring an Effective Information Security Program

The CFPB collects and stores sensitive information, including confidential supervisory information and personally identifiable information, to support many of its mission-critical activities. Unauthorized access to or disclosure of this information, through internal or external threats, could undermine the CFPB and limit its ability to accomplish its mission.

Agency Action

The CFPB continues to strengthen the information security program in many areas. In FY 2023, the CFPB maintained an OIG Maturity Model of Level 4 (Managed & Measurable) across two of five Cybersecurity framework areas despite increasing threats and more stringent standards. The CFPB made progress deploying multi-factor authentication (MFA) and data encryption, reducing the number of end points running outdated operating systems, implementing a zero-trust architecture, and continuing to test and educate staff about the risks of phishing attacks.

In FY 2024, the CFPB plans to achieve an OIG Maturity Model of Level 4 (Managed & Measurable) across 4 of 5 Cybersecurity framework areas even as standards continue to be increased and elevated. The CFPB plans to improve its cybersecurity maturity level by increasing the number of systems with MFA and data encryption and progress towards the implementation of a zero-trust architecture. The Cybersecurity Team also plans to mature the logging of cybersecurity event collection, enhance incident reporting processes, modernize the security incident and event management system, implement a continuous red-teaming program in line with U.S. Department of Homeland Security (DHS) Binding Operational Directive 20-01, and develop a digital-rights-management solution to decrease the risk of insider threat.

Responsible Executive: Chief Operating Officer, Operations

Related Objective: 4.3

Related Performance Measure: 4.3.2

2. Managing Human Capital to Maintain a Talented, Diverse, Inclusive, and Engaged Workforce

The CFPB continues to build its human capital program to sustain a diverse, high-performing, and engaged workforce. Over the last year, OHC has undertaken a series of organizational reviews to build on the next phase of the OHC business model, in addition to continuing to mature the human capital program. The OHC also welcomed a new Chief Human Capital Officer (CHCO) in October 2022. The new CHCO is actively engaged in assessing the current state of OHC and developing a five-year strategic plan that will support a human capital program dedicated to developing a diverse, high-performing, and engaged workforce. The implementation of the changes within OHC will begin in early 2024.

Agency Action

OHC successfully negotiated and implemented an agreement with the NTEU on the terms and conditions of the CFPB's new hybrid work environment (CFPB Next). The agreement addresses policies and procedures for remote work, telework, employee-initiated requests for a change in duty station, work schedules, workspace, and parking. OHC played an integral role in this effort and will continue to support the ongoing operation and management of the policies and procedures moving forward through CFPB Next.

In December 2022, the NTEU and CFPB reached agreement on Salary Reset/Compensation Reform, which focused on fostering pay equity and promoting fair, effective, and transparent pay setting practices. The new salary ranges, pay setting policies, and reset salaries were implemented in 2023. Additionally, the current compensation agreement expired on December 31, 2023, and the parties are actively negotiating a new compensation agreement.

OHC implemented in 2023 a revision of the competency-based performance standards for CFPB leaders to reinforce human capital policies and help the agency effectively manage a talented, engaged, diverse, and inclusive workforce. OHC led a cross-functional working group, including Performance Management, Learning and Organizational Development teams, Labor and Employee Relations, OMWI, OCR, and Legal Division, to implement these new standards.

OHC's performance management team conducted a triennial evaluation of the performance management program and a qualitative review of year-end performance narratives written by leaders. Findings have reinforced the understanding of employee appreciation for a coaching management style, frequent interactions with their supervisors, meaningful awards and recognition, and effective work planning to set performance expectations. Communications regarding performance management in FY 2022 focused on encouraging managers in these activities, providing job aids and resources, including video-based discussions on best practices.

To advance the CFPB's understanding of workforce trends, issues, risks, and opportunities OHC's workforce planning team conducted a range of activities to understand the skills CFPB leaders and team members need to perform their best work in the future. Based on the findings of these activities, OHC is designing new programs to close skill gaps and increase developmental opportunities.

To mature learning and development opportunities, OHC teams provided new and enhanced services that support succession planning, leadership and team member development and operational effectiveness. These included initial planning for a new learning and development program for non-supervisory team members with an interest in developing skills necessary to become competitive for new supervisory job opportunities. OHC also provided a coaching skills course for CFPB Leaders to strengthen core coaching skills among all managers, built common vocabulary around coaching principles, supported a CFPB-wide project management community of practice and developed a change management process to support targeted realignments of the CFPB's organizational structure to effectively respond to expanding mission priorities. Expansion and increased capacity of the CFPB's leadership coaching program allowed senior leaders to further engage in executive leadership coaching, as well as the creation of a new leadership coaching program for first line supervisors.

Responsible Executive: Chief Operating Officer, Operations

Related Objective: 4.1

Related Performance Measures: 4.1.2, 4.1.3, and 4.1.4

3. Continuing to Refine the Supervision and Enforcement Strategy

The CFPB is responsible for ensuring compliance with Federal consumer financial laws by supervising market participants and bringing enforcement actions when appropriate. The Dodd-Frank Act provides the CFPB with the authority to supervise insured depository institutions and credit unions with more than \$10 billion in total assets and their affiliates and certain nondepository institutions, such as mortgage companies, payday lenders, private education lenders, and larger participants in other markets as defined by rules issued by the CFPB.

An important objective of the Dodd-Frank Act is to ensure that Federal consumer financial law is enforced consistently, without regard to whether a financial service provider is a depository institution or a nondepository institution. This implicates supervision and enforcement strategy, including with regard to determining whether to apply supervision or enforcement tools in

specific circumstances and determining how to allocate its resources given the large number of entities within the CFPB's authority.

The Office of Inspector General (OIG) noted that the CFPB should continue to assess the strategy and resources needed to supervise both depository and nondepository institutions efficiently and effectively given the number of entities in the marketplace. The CFPB is monitoring consumer financial markets to identify potential consumer risks. The CFPB also continues to assess, define, and evolve its strategy for overseeing supervised entities, including the types and frequency of supervisory activities at such entities.

The OIG also noted that CFPB must continue to define and mature its tool selection process. The CFPB may apply supervision or enforcement tools in a variety of circumstances, and the selection and application of such tools are crucial to effective oversight. The CFPB continues to define and mature its tool selection process to promote consistency in its oversight of depository and nondepository institutions as well as efficiency and effectiveness in the CFPB's oversight of compliance with federal consumer financial law.

The OIG also noted that the CFPB should evaluate its human capital needs to ensure that it maintains a workforce with the requisite skills and expertise to support its strategy and continue to evaluate its technology needs to ensure they adequately support the effectiveness and efficiency of its supervisory and enforcement functions.

Agency Action

SEFL has in place tool selection processes, including the Action Review Committee (ARC) Process. The ARC determines through a deliberative and rigorous process whether matters that originate from examinations will be resolved through confidential supervisory action or subject to investigation and resolution through a potential public enforcement action. Throughout FY 2023 the Division has continued to evaluate refinements to the ARC Process and other tool selection processes, as well as to consider new tool selection processes.

The CFPB is also taking steps to focus more supervisory efforts on nondepository institutions. In FY 2022 the CFPB finalized changes to the nonbank supervision procedural rule, in order to provide transparency to the public about how the CFPB will exercise its authority under the Dodd-Frank Act to supervise a nonbank covered entity that it has reasonable cause to determine is engaging, or has engaged, in conduct that poses risks to consumers with regard to consumer financial products or services. The CFPB is also continuing to assess sources and capabilities that will provide an enhanced data-driven approach to its areas of supervisory focus. Leveraging

additional data sources as well as artificial intelligence within the supervisory prioritization process has the potential to allow CFPB analysts to identify risk signals more efficiently and effectively throughout all institutional product lines under the CFPB's supervisory jurisdiction, especially at nondepository institutions that do not have traditional reporting sources and are far larger in number than depository institutions.

Additionally, the CFPB is also researching new supervisory technology tools to ensure it focuses its supervisory resources as effectively as possible, including at nondepository institutions. The CFPB is in the process of modernizing its Supervision and Examination System in order to provide increased functionality and efficiencies in the supervision and examination process. The CFPB is also seeking to partner with its state and federal counterparts to use the collective resources of the agencies and knowledge to be more efficient regulators.

Staffing for enforcement has significantly increased in FY 2024 to allow the CFPB to open more investigations. Enforcement also continues to deploy its resources effectively to ensure timely action, appropriate prioritization, and adequate support.

Enforcement also continues to assess its technology needs and improve on its technology tools to better allow a data driven approach to its investigations and matter management.

Responsible Executive: Associate Director, Supervision, Enforcement, & Fair Lending

Related Objectives: 1.2 and 1.3

Related Performance Measures: 1.2.7, 1.2.8, and 1.3.3

4. Managing consumer complaints

Under authority granted by the Dodd-Frank Act, the CFPB collects, monitors, and responds to complaints from consumers on financial services and products. The CFPB has identified the handling of consumer complaints as a mission-essential function that is critical to its strategic contingency planning efforts in its Continuity of Operations Plan. The CFPB's Office of Consumer Response receives complaints directly from consumers about the challenges they face in the financial services and products marketplace and uses the complaint data to create reports for internal and external reporting. The number of complaints has continued to grow gradually since the creation of Consumer Response. Processing an increase in complaints during challenging times, such as the pandemic, may strain the CFPB's resources.

Since its creation, the CFPB has received more than 6.5 million complaints, and more than 6,500 financial companies have responded to their customers through the CFPB's complaint

process. Further, the monthly average complaint volume increased from about 29,000 complaints in 2019 to an average of approximately 107,000 complaints in 2022. Moreover, whereas Consumer Response handled approximately 352,400 complaints in 2019, it handled approximately 542,300 complaints in 2020, approximately 994,400 complaints in 2021, and nearly 1.3 million complaints in 2022.

Due to the effects of the pandemic, consumers continue to experience problems such as incorrect credit report information, difficulty paying their mortgages, or difficulty paying their student loans, resulting in even more complaints. Consumer Response has also undergone multiple organizational shifts within the past five years, having moved from the Operations Division to the Consumer Education & Engagement Division, then to the Division of Consumer Education & External Affairs, and then to the newly created Division of Consumer Response & Education. In addition, the CFPB has redistributed some of Consumer Response's resources to other divisions.

Agency Action

In FY 2022, Consumer Response acknowledged this continued increase in complaint volume as a management challenge, as required by statute. At this time, the OIG has not recommended that Consumer Response change its current practices aimed at mitigating the challenge. As such, Consumer Response will continue to rely on its current processes and systems for routing complaints to financial services companies for response. In addition, Consumer Response has moved its call centers to a primarily remote work environment to maintain continuity of services for consumers calling the CFPB. Consumer Response is continuing to monitor company response timeliness, enabling it to share and publish data about the timeliness of these responses. Although organizational shifts have reduced its available staff resources, Consumer Response expects that its scalable model can continue to handle increased complaint volume and does not anticipate the need to change the complaint process.

Responsible Executive: Associate Director, Consumer Education & External Affairs²²

Related Objective: 2.2

Related Performance Measures: 2.2.1, 2.2.2, 2.2.3, and 2.2.4

²² In FY 2024, the Consumer Education & External Affairs Division split to form the External Affairs Division and the Consumer Response & Education Division.

Appendix D: Defined Terms

ACRONYM	DEFINED TERM
ADR	Alternative Dispute Resolution
AES	Annual Employee Survey
APP	Annual Performance Plan
ARC	Action Review Committee
Board	Board of Governors of the Federal Reserve System
BPR	Biannual Performance Review
CFPB Fund	Bureau of Consumer Financial Protection Fund
CFPA	Consumer Financial Protection Act of 2010
CFPB	The Consumer Financial Protection Bureau
CHCO	Chief Human Capital Officer
CISA	Cybersecurity and Infrastructure Security Agency

ACRONYM	DEFINED TERM
CPF	Consumer Financial Civil Penalty Fund
DAPS	Disability and Accessibility Program Section
DEIA	Diversity, Equity, Inclusion, and Accessibility
DHS	U.S. Department of Homeland Security
Dodd-Frank Act	Dodd-Frank Wall Street Reform and Consumer Protection Act Public Law No. 111-203
ECI	Employment Cost Index
ECP	Examiner Commissioning Program
eCRM	CFPB's Engagement Management System
EDM	Enterprise Data Management
EEO	Equal Employment Opportunity

ACRONYM	DEFINED TERM
ENForce	Enforcement Matter Management System
EO	Executive Order
ERM	Enterprise Risk Management
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
FHFA	Federal Housing Finance Agency
FITARA	Federal IT Acquisition Reform Act
FMFIA	Federal Managers' Financial Integrity Act of 1982
FOIA	Freedom of Information Act
FTE	Full-Time Equivalent
FY	Fiscal Year

ACRONYM	DEFINED TERM
GAO	Government Accountability Office
GPRAMA	GPRA Modernization Act
HMDA	Home Mortgage Disclosure Act
HUD	Department of Housing and Urban Development
IAA	Interagency Agreement
ILSA	Interstate Land Sales Full Disclosure Act of 1968
IT	Information Technology
LEP	Limited English Proficient
MD	Management Directive
MFA	Multi-factor Authentication
MOU	Memorandum of Understanding

ACRONYM	DEFINED TERM
MWOB	Minority and Women-owned Businesses
NCUA	National Credit Union Administration
NDU	National Defense University
NICE	National initiative for Cybersecurity Education
NIST	National Institution of Standards and Technology
NSF	Non-sufficient funds
NSMO	National Survey of Mortgage Originations
NTEU	National Treasury Employees Union
OCC	Office of the Comptroller of the Currency
OCR	Office of Civil Rights
OEOF	Office of Equal Opportunity and Fairness

ACRONYM	DEFINED TERM
OHC	Office of Human Capital
OIG	Office of Inspector General
OMB	Office of Management and Budget
OMWI	Office of Minority and Women Inclusion
OPM	Office of Personnel Management
OR	Office of Research
OSM	Office of Stakeholder Management
POA&Ms	Plans of Action and Milestones
RMR	Division of Research, Monitoring, & Regulations
SBL	Small Business Lending
SBREFA	Small Business Regulatory Enforcement Fairness Act

ACRONYM**DEFINED TERM****SEFL**

Division of Supervision, Enforcement, & Fair Lending

SES

Supervision and Examination System

SSRN

Social Science Research Network

T&I

Technology and Innovation

TCCP

Terms of Credit Card Plans

TESC

Technical Executive Steering Committee

US-CERT

United States Computer Emergency Readiness Team