Fiscal Year 2013 Performance Management Analysis: Snapshot of Findings

Consumer Financial Protection Bureau

May 2014

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1. Executive Summary

Like other federal agencies, the Consumer Financial Protection Bureau (CFPB) has evaluated employee performance through a formal performance management program. As part of its retrospective analysis of the fiscal year 2013 performance ratings, the CFPB conducted a series of analyses, including statistical analyses, to evaluate the effect of a wide variety of factors on performance management outcomes. These internal analyses were sobering, and raised concerns about the various factors that appeared to affect the results of the CFPB's performance management program. Shortly after these matters were made public, we made a commitment to everyone at the CFPB that we would conduct additional analyses and communicate our findings, along with any necessary corrective action. This report is intended to provide an update on what we found and what changes to expect in the coming weeks and months.

In January, before any of this information was made public, we initiated additional research to better understand statistical differences that we had observed at the summary level. These recently completed analyses, conducted by the Office of Fair Lending and Equal Opportunity, the Office of Research, the Legal Division, and the Office of Human Capital, in consultation with the Office of Minority and Women Inclusion and the Office of Equal Employment Opportunity, revealed broad-based, statistically significant disparities for employees based on a wide range of characteristics. Specifically, the analyses revealed statistically significant disparities in the areas of race/ethnicity, age, bargaining unit membership, location in the field or at headquarters, job pay band, tenure as a CFPB employee, and for some employees status as a Dodd-Frank transferee.

We are still in the process of examining the root causes of the disparities. But based on our initial analysis, it is clear that there was no single factor that caused these problems. It also seems clear that we should take the initiative to remedy the disparities that our performance management system created.

As a result of our analysis, we are taking the following steps, which we believe to be the most reasonable path forward: (1) in collaboration with the National Treasury Employees Union (NTEU), we are creating the framework to develop a new and improved performance management system for future use; and (2) we are making appropriate adjustments to past compensation to ensure that we erase the remnants of any statistical disparities that were caused by our previous performance management system.

Summary of findings

The initial findings demonstrated statistically significant differences in the performance ratings between:

- Black and Hispanic employees as compared with non-Hispanic white employees;
- Employees under age 40 and those 40 or more years of age;
- Employees in the bargaining unit and those employees not in the bargaining unit;
- Employees located in the field and those located in our Washington, D.C. headquarters;
- Employees at lower and higher job pay bands at the CFPB;
- Employees with less than one year of experience at the CFPB and employees with more than one year of experience at the Bureau; and
- Employees who joined the Bureau as Dodd-Frank transferees from other agencies and employees who were hired through other channels.

This report provides more detail about the CFPB performance management system, the findings associated with the fiscal year 2013 ratings, and our plan for responsive actions.

1.1 Timeline of key events

The CFPB's performance management program was designed and launched in the fall of 2011. A timeline of key events in the life-cycle of that program goes as follows:

- October 17, 2011: CFPB establishes "Performance Management Program Interim Policy #23" to govern CFPB's performance management program

- April 30, 2012: Stuart Ishimaru selected as Director of the Office of Minority and Women Inclusion
- August 17, 2012: CFPB requests U.S. Office of Personnel Management (OPM) approval for the performance management system
- September 25, 2012: OPM grants approval for CFPB performance management system
- February 11, 2013: M. Stacey Bach named Acting Director, Office of Equal Employment Opportunity. She received a permanent appointment on December 29, 2013
- June 24, 2013: CFPB and NTEU memorandum of understanding (MOU) implementing new negotiated grievance procedure for performance rating appeals from bargaining unit employees
- November 26, 2013: Fiscal year 2013 performance ratings finalized
- December 13, 2013: Office of Human Capital conducts study of fiscal year 2013 performance management ratings; identifies differences across employee demographics
- January 6, 2014: Preliminary summary ratings results presented to the Director at a regularly scheduled Inclusion Strategy meeting
- January 2014: CFPB leadership shares with NTEU its findings of identified differences
- January 31, 2014: CFPB initiates additional analysis to understand identified differences
- January 31, 2014: Director instructs CFPB negotiating team to work with NTEU in the collective bargaining process to design a new performance management system
- March 10, 2014: CFPB announces publicly that it will be moving away from its performance management system
- May 19, 2014: CFPB announces concrete next steps for addressing the problems of the old performance management system, including:
    - New framework for an improved performance management system, developed in collaboration with the NTEU; and
    - Appropriate adjustments to compensation to ensure that the remnants of any disparities caused by the performance management system are eliminated.

1.2 Introduction to the fiscal year 2013 performance management program

The performance management program at CFPB, among other things, served as the basis for determining "pay-for-performance" amounts provided to employees. These increases take two forms: *merit increases*, which affect employees' base salary and growth over time, and *supplemental lump sum payments*, which are one-time, discrete performance awards. Both annual compensation programs were directly tied to and dependent upon an employee's performance rating, meaning that the higher the rating the higher the increase in compensation.

Employees were evaluated against a combination of Bureau-wide core competencies and individual performance objectives. CFPB's core competencies differed based on whether an employee was a non-supervisor, supervisor, or executive (see chart below).

TABLE 1: CFPB'S CORE COMPETENCIES

Non-Supervisory Employees	Non-Executive Supervisors	Executives
Core Competencies	**Core Competencies**	**Executive Competencies**
Collaboration	Collaboration	Leading change
Communication	Communication	Leading people
Problem Solving	Problem Solving	Results-driven
Adaptability	Adaptability	Business acumen
		Building coalitions
Job-Specific Competency	**Supervisory Competencies**	
Subject matter expertise	Strategic thinking	
	Leading, managing, and developing others	
	Managing resources	

Employees were evaluated against a five-level rating scale on each of the core competencies and performance objectives. Competencies and performance objectives carried equal weight in the system. The ratings for competencies and objectives were averaged separately and then the competencies average and the objectives average were again averaged to create a summary rating score. That score was calculated to two decimal points. The summary rating score was then rounded to a single whole digit to form the end-of-year rating of record.

TABLE 2: CFPB'S 5 LEVEL RATING SCALE (COMPETENCIES AND PERFORMANCE OBJECTIVES)

Rating Level	Assigned Point Value
Unacceptable	1
Marginal Performer	2
Solid Performer	3
High Performer	4
Role Model	5

During the CFPB's early years of development, management aspired to design and implement a rigorous performance management program. As such, the system's overall or summary rating of a 3 (designated as "solid performance") was intended to reflect an employee's successful performance. Ratings of 4 for "high performance" and 5 for "role model performance" were intended to be reserved for the highest-performing employees. By incorporating organization-wide competencies into a rigorous 5-level rating system, the Bureau drew heavily upon best practices from across the public, private, and nonprofit sectors. Yet we have found through our internal review that the Bureau's execution against these objectives was not satisfactory.

1.2.1 Accountability mechanisms

The fiscal year 2013 performance program included a series of checks and balances to hold individual managers accountable:

- *Multi-level ratings review process*: Individual performance ratings required submission by the employee's rating official, and subsequent review and approval by the reviewing official. The Office of Human Capital provided associate directors with summary information on the distribution of the ratings in their division. Associate directors reviewed that information and then provided approval for their reviewing officials to proceed with finalization of the ratings. Reviewing officials then directed rating officials to make any final modifications if needed. Reviewing officials were able to access and view the performance ratings and narratives for all employees whom they supervised and for the employees supervised by their direct reports. Employees were able to access their performance evaluation electronically and were asked to acknowledge their ratings electronically as well.

- *Formal multi-level grievance procedure*: Employees who believed that their ratings were inaccurate could request reconsideration of their rating, or initiate an informal grievance (if the employee was in the bargaining unit). If an employee remained dissatisfied after this first step, then s/he could request an appeal, or initiate a formal grievance (if the employee was in the bargaining unit).

- *Formal process for reporting discrimination*: Employees who believed that they had been discriminated against could file a grievance through the Equal Employment Opportunity process.

- *Limited impact per manager*: Most managers were responsible for rating 7 or fewer employees.

1.2.2 Challenges with the performance management system

The concerns we identified with the system must be evaluated in context. The performance management system implemented by the CFPB was based on best practices and, on paper, it had considerable merit. However, in light of these findings, it is clear that the system was too sophisticated for a new agency like the CFPB, which was experiencing a high level of rapid growth and organizational pressures as it worked to build itself out starting from scratch. In fiscal year 2012, the CFPB grew from 663 employees to 970 employees. Similarly, in fiscal year 2013, the CFPB grew from 970 employees to 1302 employees. Throughout this time, our managers were tasked with building their offices, meeting tight timelines required for substantial statutory obligations, and delivering tangible results for American consumers. In retrospect, applying such a complicated performance management system and tying compensation to that system at such an early stage in our history was overly ambitious, even if well intentioned.

In that context, it is not surprising that, although the fiscal year 2013 performance management system included mechanisms to ensure fair and equal treatment of individual employees, it lacked policies and procedures for addressing more systemic problems in real time. Some initial observations of system-wide challenges include:

- *Rating standards*: The competency elements of the performance management program were initially designed in fiscal year 2011, when the CFPB's work was just being defined. These elements are being re-examined as the CFPB's work, workforce, and performance requirements have changed substantially since that time. Those improved standards must be clearly defined, with policies and procedures in place to ensure that they are applied uniformly.

- *Training of managers/Application of rating standards*: CFPB managers came from a wide diversity of backgrounds, with varying levels of experience using a ratings system, and with different ratings systems. For many managers, the fall of 2013 was the first time they had used a system like the CFPB's performance management system. The CFPB will make training on the performance management competencies mandatory and will improve the timelines and mechanisms for building a shared understanding of the competency definitions, performance objectives, and rating standards.

- *Compliance management*: Although there was a process in place to review summary ratings before they were finalized, it did not include a demographic analysis that would have aided the Bureau in observing and addressing potential ratings differences across categories. The analytical review processes aimed at addressing rating differences on the basis of business unit, field/headquarters assignment, and job pay band were not consistently applied and ultimately did not result in changes that might have redressed those issues during the ratings process. Moving forward, the CFPB will ensure that any ratings system it implements includes rigorous internal controls to safeguard against future statistical disparities.

- We will continue to do further analysis into these issues to ensure appropriate accountability and we will work with the NTEU so that this analysis informs the design of our future performance management system.

2. Report of Findings

The analyses that the CFPB undertook to perform on its performance management system revealed broad-based disparities in performance ratings across many categories of employees. CFPB leadership found the differences that it initially observed to be troubling. The analyses in this report conducted between January and April of 2014 revealed statistically significant differences and some patterns of results that raised concerns along a broad array of characteristics.

In order to ensure a rigorous analysis, the Bureau applied two distinct analytical methods[1] to the ratings in the fiscal year 2013 performance period in January of 2014. Both analyses, separately conducted, led to the same conclusions. Under the CFPB's fiscal year 2013 performance management program, disparities in performance ratings between employees across a broad spectrum of characteristics were statistically significant and not isolated to any specific areas within the CFPB. Among the categories of analysis were Race/Ethnicity and Age, though a variety of other categories yielded findings of disparities as well. Controlling for other possible explanations, our analysis indicated that employees were subject to statistical disparities in outcomes on these bases.

Our analysis revealed differences across a large number of employees and managers and does not support a conclusion that the issues were limited to certain discrete areas of the Bureau or that the actions of one or a small number of managers drove the overall disparities. **Instead, our analysis demonstrates disparities in outcomes across CFPB divisions, with black and Hispanic employees, employees 40 or more years of age, employees in the bargaining unit, employees located in the field, employees at lower job pay**

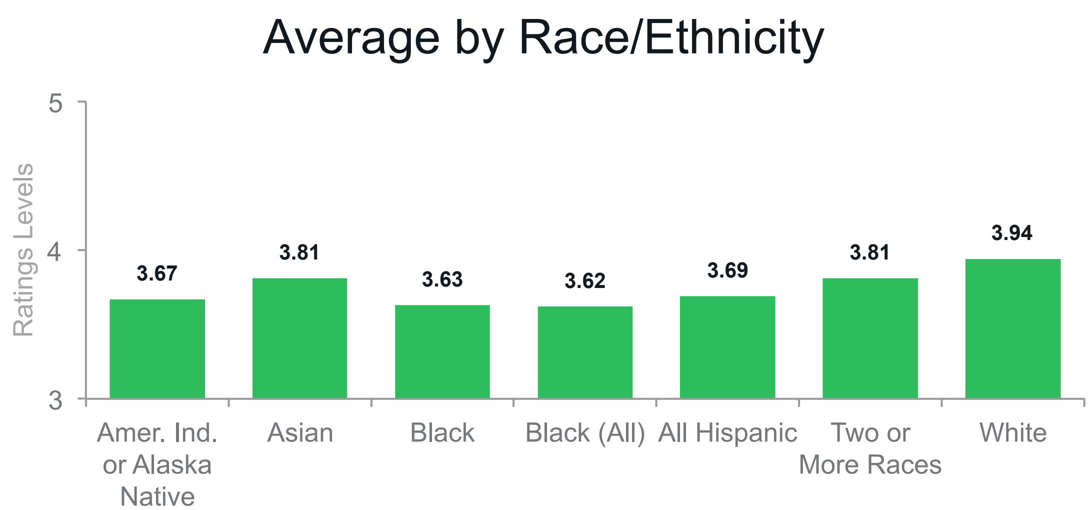
[1] The CFPB conducted two separate, distinct, and comprehensive analyses: one consistent with best practices in human resource analyses, and one consistent with the statistical analysis performed in support of fair lending work.

bands, employees with less than 1 year of experience at the Bureau, and employees who joined the Bureau as Dodd-Frank transferees all receiving systematically lower ratings.

2.1 Race/Ethnicity

When the CFPB first examined fiscal year 2013 performance ratings in December of 2013, the preliminary analysis revealed that black and Hispanic employees were more likely than white employees to receive a rating of 3, while white employees were more likely than black and Hispanic employees to receive a rating of 5. Further analysis demonstrated the strength of those effects more clearly: the average ratings for black and Hispanic employees were lower than the average ratings for white and Asian employees. The difference was statistically significant in both instances.

FIGURE 1: AVERAGE RATING BY RACE/ETHNICITY, FY2013 PERFORMANCE PERIOD



[2]

[2] Black indicates employees who self-identified as only black; black (All) includes those employees as well as employees who self-identified as both black and another race

These differences in the average rating for employees of different races and ethnicities were persistent across divisions:

FIGURE 2: AVERAGE RATINGS FOR BLACK AND WHITE EMPLOYEES BY DIVISION, FY2013 PERFORMANCE PERIOD

2.1.1 Differing manifestations of disparities

This analysis also revealed that these differences were driven by two key dynamics affecting the performance ratings:

- **Differing distributions**: Everything being equal, overall distributions of ratings across the ratings scale for minority and white employees should appear similar. *However the distributions between minority employees and white employees do not appear similar; ratings for white employees are more concentrated around the 4 and 5 rating levels than black and Hispanic employees, and ratings for black and Hispanic employees are concentrated in the 3 rating level:*

FIGURE 3: DISTRIBUTION OF SUMMARY RATINGS FOR ALL EMPLOYEES, FY2013 PERFORMANCE PERIOD

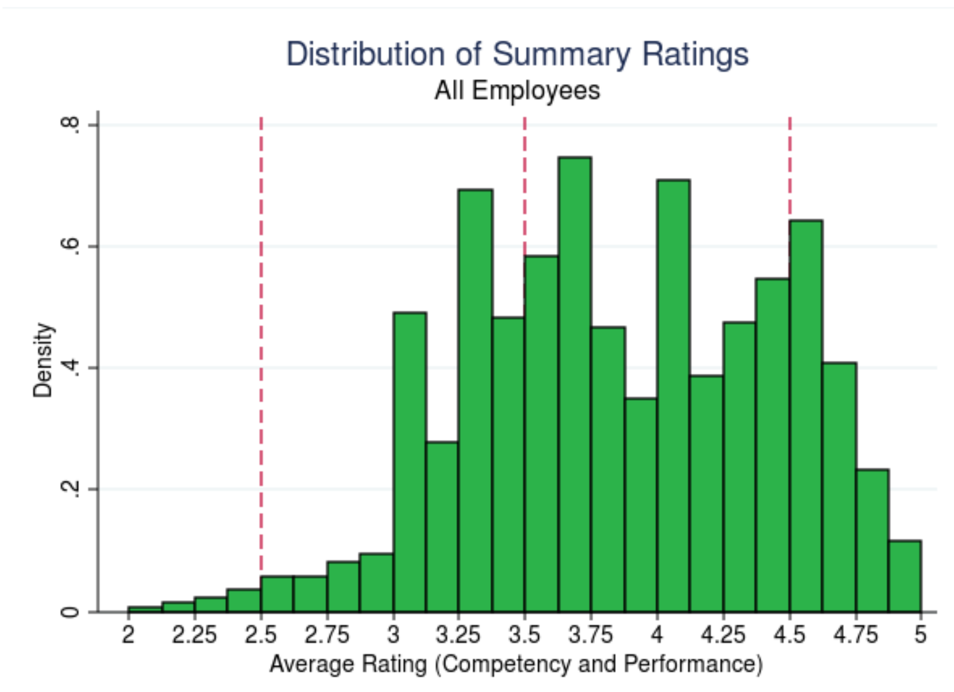
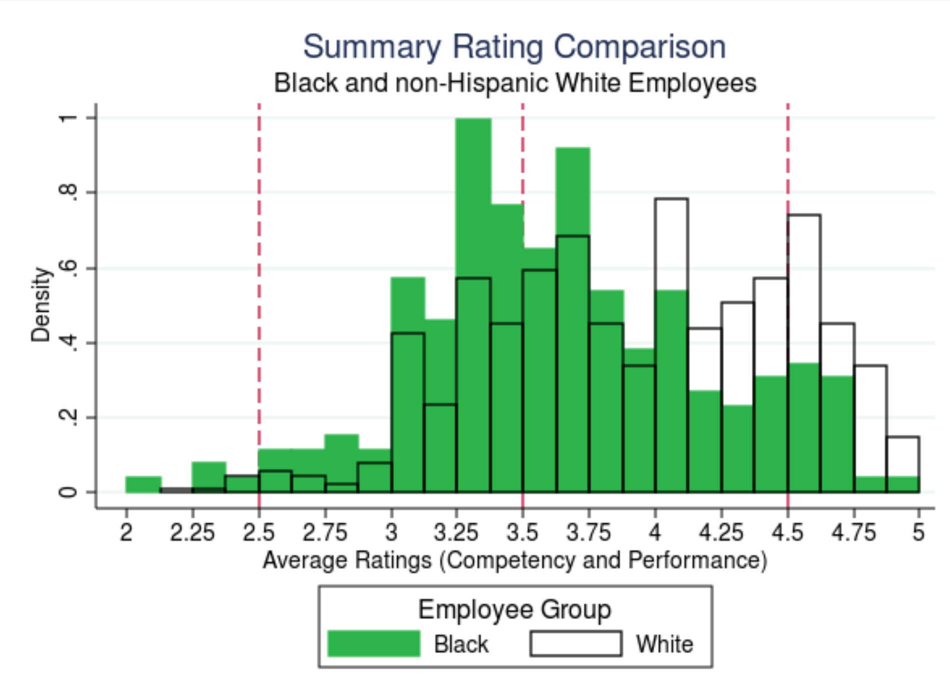


FIGURE 4: SUMMARY RATINGS COMPARISON: BLACK AND NON-HISPANIC WHITE EMPLOYEES[3], FY2013 PERFORMANCE PERIOD



- **Additionally, there are differences around rounding cutoff points for summary ratings**. With key cutoffs at 3.5 and 4.5 (the difference between a 3 rating and a 4 rating and a 4 rating and a 5 rating respectively), small changes in the summary ratings mattered more at certain points in the distribution with direct implications for some employees' compensation. For example, the difference between a summary rating of 3.09 and 3.12 made no difference in an employee's compensation because both of those summary ratings resulted in the same overall rating of 3. Conversely, the difference between a 3.49 and a 3.51 had direct implications for an employee's compensation since a summary rating of 3.49 resulted in an overall rating of 3, while a summary rating of 3.51 resulted in an overall rating of 4. Whereas we would expect the proportions of ratings just above and just below these cutoffs to be similar for each group, what we observe is systemically dissimilar; across the CFPB, black employees experienced

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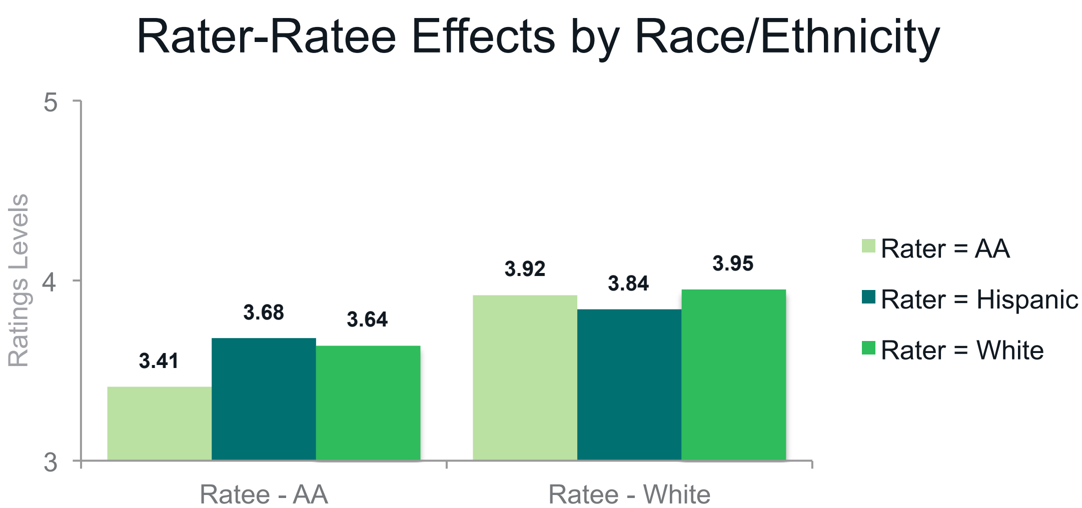
[3] Note: the graph for Hispanic vs. non-Hispanic White looks qualitatively similar to this, but with a higher "spike" to the right of the 3.5 cutoff.

negative disparities relative to their non-Hispanic white counterparts in their results around key cutoffs between overall ratings and white employees did not.[4]

2.1.2 Rater–Ratee effects by Race/Ethnicity

This analysis demonstrated the overall interaction effect between rating official's race on the average rating of their reporting employees. Employees of the same race as their rating official received lower average ratings than employees evaluated by rating officials of a different race or ethnicity. In the case of black raters rating black employees, those differences were statistically significant.

FIGURE 5: RATER/RATEE EFFECT COMPARISON: AVERAGE RATINGS OF BLACK, HISPANIC, AND NON-HISPANIC WHITE EMPLOYEES BY RATER RACE/ETHNICITY, FY2013 PERFORMANCE PERIOD

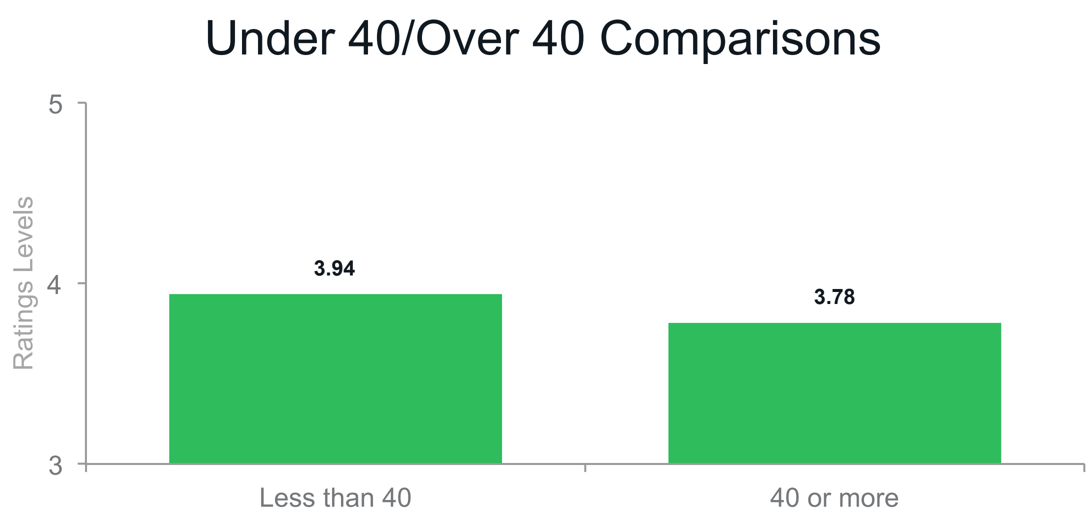


[4] This analysis was not possible for Hispanic employees due to small sample sizes.

2.2 Age

This analysis revealed disparities in the average performance ratings of employees 40 or more years in age. These employees received lower average ratings than employees under 40 years in age and those differences were statistically significant:

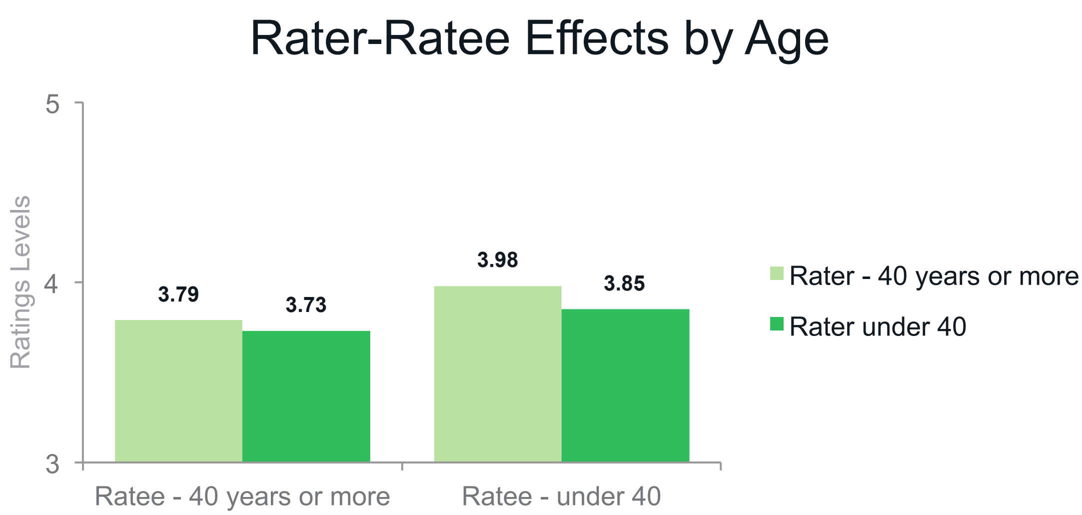
FIGURE 6: AVERAGE RATING FOR EMPLOYEES UNDER AND OVER AGE 40, FY2013 PERFORMANCE PERIOD



2.2.1 Rater-Ratee Effects by Age

This analysis demonstrated the interaction between rating official's age on the average rating of their reporting employee. Disparities in the average performance ratings for employees 40 years or more in age and employees under 40 years in age as they were rated by officials under or over 40 years in age were not statistically significant:

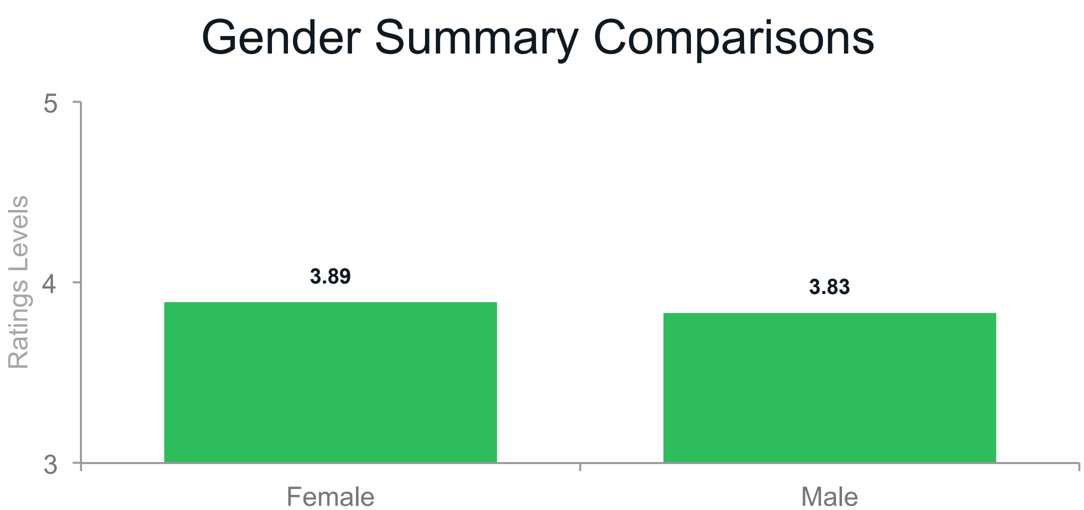
FIGURE 7: RATER/RATEE EFFECT COMPARISON: AVERAGE RATINGS OF EMPLOYEES 40 YEARS OR MORE IN AGE AND EMPLOYEES UNDER 40 YEARS IN AGE BY RATER AGE, FY2013 PERFORMANCE PERIOD



2.3 Gender

Disparities in the average performance ratings for male and female employees were not statistically significant:

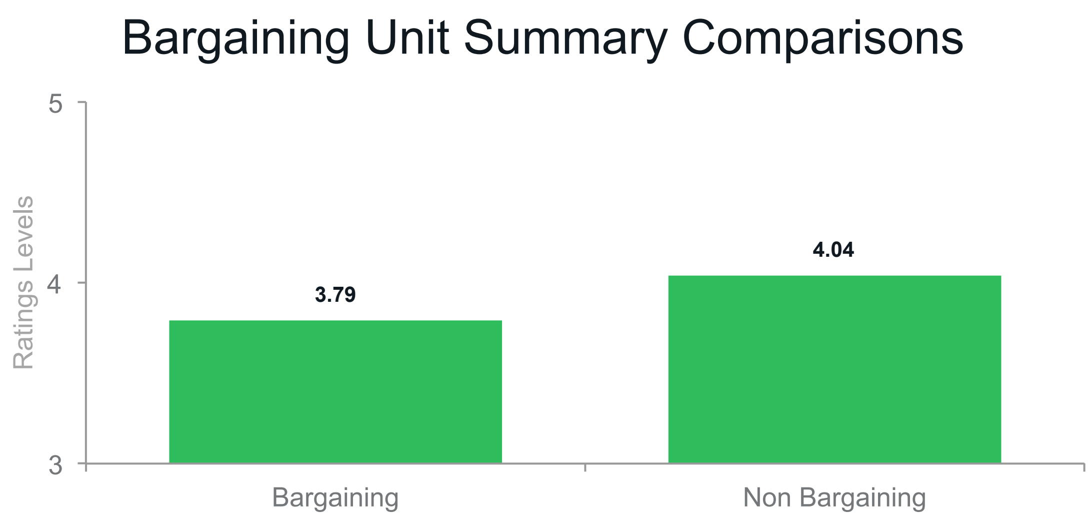
FIGURE 8: AVERAGE RATING FOR EMPLOYEES BY GENDER, FY2013 PERFORMANCE PERIOD



2.4 Bargaining Unit Membership

This analysis revealed disparities in the average performance ratings of employees in the bargaining unit. These employees received lower average ratings than employees not in the bargaining unit and those differences were statistically significant. In the analysis, this effect is difficult to separate from job pay band because job pay band and bargaining unit status are so closely correlated:

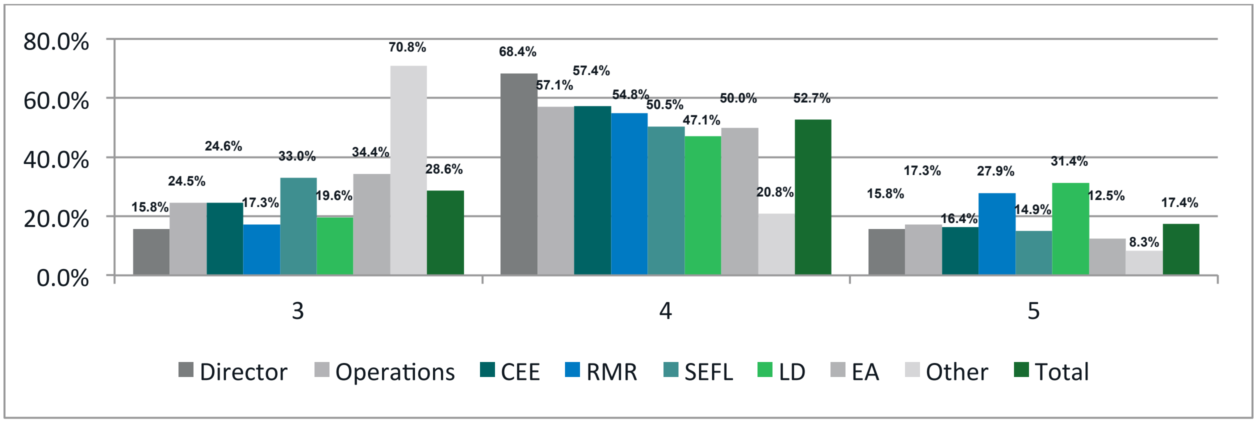
FIGURE 9: AVERAGE RATING FOR EMPLOYEES IN THE BARGAINING UNIT AND EMPLOYEES NOT IN THE BARGAINING UNIT, FY2013 PERFORMANCE PERIOD



2.5 Business Unit

This analysis demonstrated differences in performance ratings across divisions. Employees in the Supervision, Enforcement, and Fair Lending division and the Operations division were more likely than employees in other divisions to receive a rating of 3, while employees in the Legal division and the Research, Markets, and Regulations division were more likely than employees in other divisions to receive a rating of 5. It is worth noting that these findings do not necessarily reflect upon the particular categories of employees discussed above, but instead may reflect differences in how divisions calibrated scores and/or the interaction of other division-specific factors:

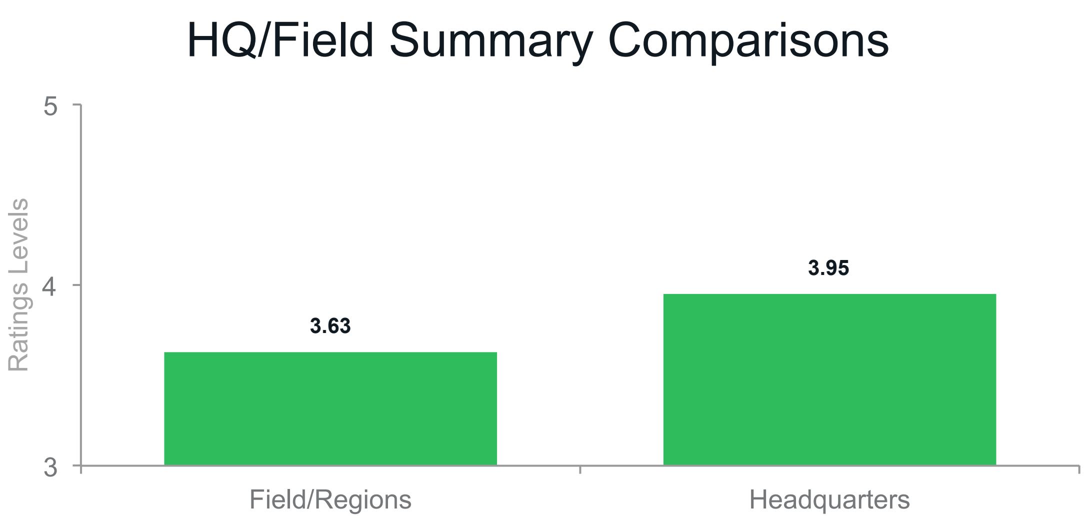
FIGURE 10: DISTRIBUTION OF RATINGS FOR EMPLOYEES RATED 3, 4, AND 5 BY DIVISION, FY2013 PERFORMANCE PERIOD



2.6 Headquarters/Field

This analysis revealed disparities in the average performance ratings of employees located in the CFPB field offices. These employees received lower average ratings than employees located at the CFPB headquarters offices and those differences were statistically significant:

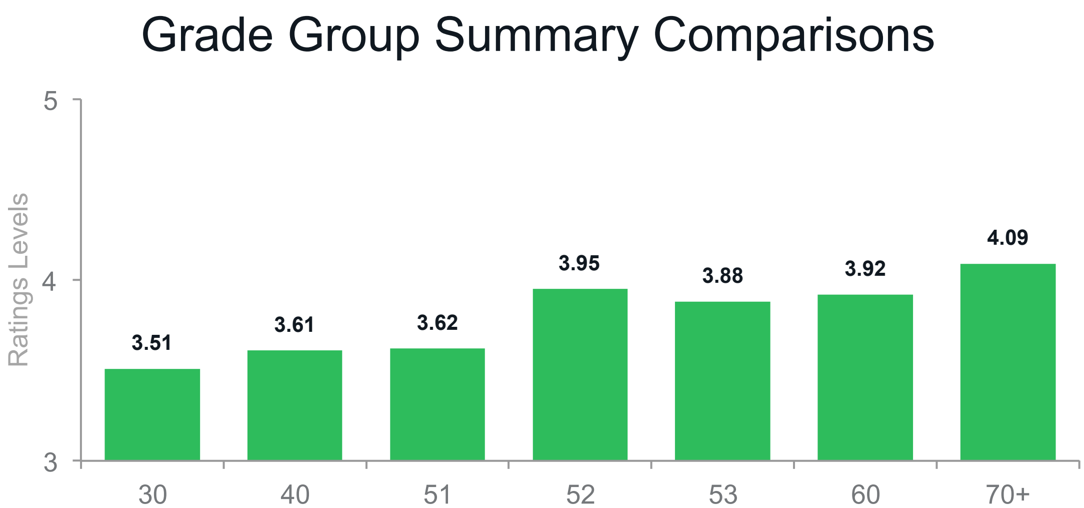
FIGURE 11: AVERAGE RATING BY HEADQUARTERS/FIELD STATUS, FY2013 PERFORMANCE PERIOD



2.7 Job Pay Bands

This analysis revealed disparities in the average performance ratings of employees in different job pay bands. These analyses demonstrated that employees at higher pay bands received higher average ratings than employees at lower pay bands. Those differences were statistically significant:

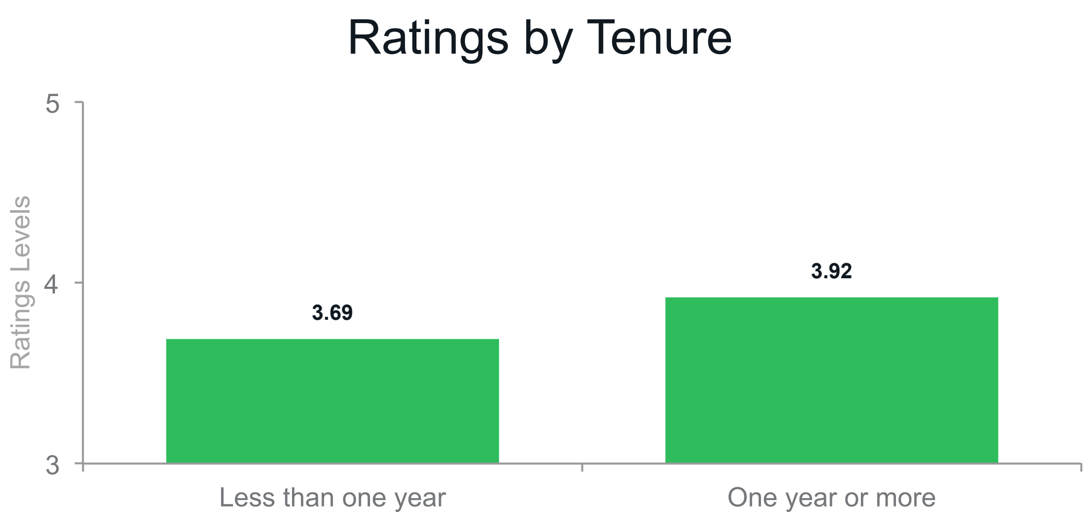
FIGURE 12: AVERAGE RATING BY PAY GRADE, FY2013 PERFORMANCE PERIOD



2.8 CFPB Tenure

This analysis revealed disparities in the average performance ratings of employees with shorter tenures at the Bureau. Employees with less than one year of tenure at the Bureau received lower average ratings than employees with more than one year of tenure at the Bureau and those differences were statistically significant:

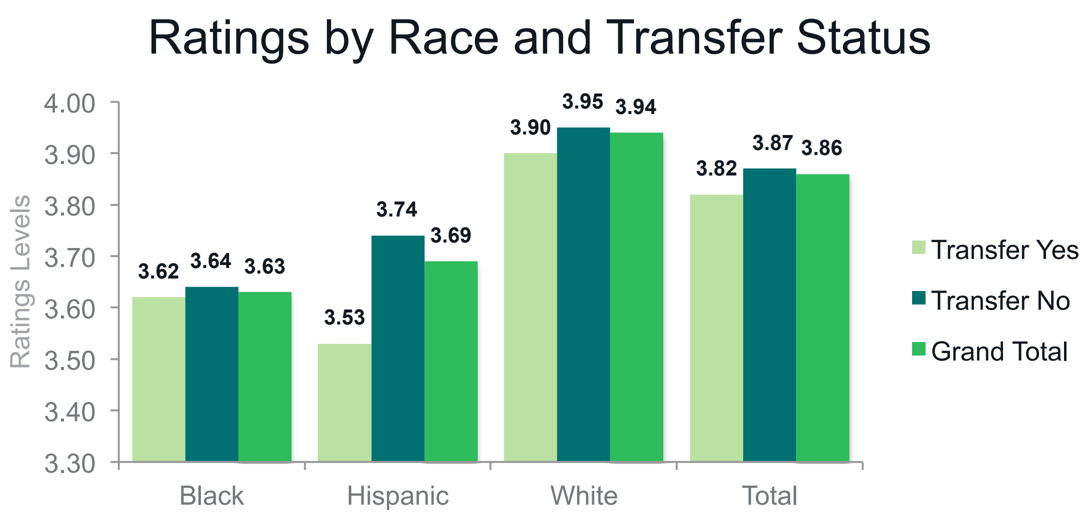
FIGURE 13: AVERAGE RATING FOR EMPLOYEES BY TENURE LESS THAN/GREATER THAN 1 YEAR, FY2013 PERFORMANCE PERIOD



2.9 Transferee Status

This analysis revealed disparities in the average performance ratings of employees who joined the Bureau as Dodd-Frank transferees. This dynamic interacted with race/ethnicity, as Hispanic Dodd-Frank transferees were affected more negatively than non-Hispanic employees. The overall differences were not statistically significant:

FIGURE 14: AVERAGE RATING FOR BLACK, HISPANIC, AND WHITE EMPLOYEES BY TRANSFER STATUS, FY2013 PERFORMANCE PERIOD



In sum, our performance ratings system did not meet our own objectives and expectations. The analyses we undertook found statistically significant disparities indicating that employees were more likely to receive higher or lower overall performance ratings based on their race, age, pay grade, bargaining unit membership eligibility, tenure, or where they work within the agency, and for these reasons we have decided to revisit our approach to our performance management program.

3. CFPB's Response

The analyses conducted in late 2013 and early 2014 about the CFPB's fiscal year 2013 performance management system suggest many avenues for improvement, correction, and remediation, both in terms of direct changes to the performance management system, and further work to be done to promote fairness and inclusion within the CFPB workplace environment.

We are taking specific steps to respond to these findings, and we will be working toward a more comprehensive set of recommendations in the coming months that will bring us closer to our shared ideals. We are committed to creating an organization that consciously embraces diversity – not only to ensure that there are no obvious disparities in how employees are treated, but also to recognize and address potential blind spots so that we can cultivate all of our employees, both to allow them to perform at their best and to fulfill our mission to protect consumers.

This section provides an overview of what we have done already and what we expect to do over the coming weeks and months:

1. In late 2013, even before these disparities were made public, CFPB's senior leadership started a discussion about the need to change its performance management system based on dissatisfaction with the system from both managers and employees.

2. Upon review of the initial performance ratings analysis in early January 2014, CFPB leadership shared these findings with the NTEU and initiated additional internal analysis to understand the summary disparities that were perceived.

3. In January, CFPB and NTEU agreed to negotiate over how to move away from the fiscal year 2013 performance management system. In addition, upon recognition of the summary disparities in outcomes experienced by CFPB employees, the CFPB committed to the NTEU that it would work with the NTEU to understand the root causes for those disparities and remediate any problems identified.

4. Following those conversations, CFPB leveraged its internal expertise in fair lending, statistical disparity, and discrimination analysis to conduct a thorough self-assessment with the same, if not greater, analytic rigor that we would apply in analogous circumstances to fair lending issues at supervised institutions.

5. On January 31, the Director instructed the team negotiating with the NTEU to use the collective bargaining process to develop a new system focused primarily on employee growth and development, with less emphasis on numerical ratings.

6. Director Cordray elevated the Office of Minority and Women Inclusion (OMWI) to the Office of the Director. At that time, he charged OMWI Director Stuart Ishimaru with conducting a series of Bureau-wide listening sessions to hear directly from employees about their experience with equality and fairness. The Director also asked for a report within 90 days, discussing the diversity and equality concerns of our employees and making specific recommendations for addressing those concerns. OMWI conducted its first Bureau wide listening session with the Office of Consumer Response on April 23, 2014, and has completed 11 such sessions to date.

7. Earlier this month, Director Cordray, in consultation with the EEO office, decided to make EEO training mandatory for all managers and supervisors. These mandatory trainings will be rolled out this summer and will be the first step in a more focused and comprehensive training effort for managers and supervisors on issues about diversity and equality. This training is in addition to the mandatory EEO training that all employees must complete annually.

8. On May 15, the CFPB released a Request for Proposals for a comprehensive third-party review and validation of its internally-conducted performance management analysis, and a broad-based evaluation of major human capital processes including hiring, promotion, and compensation, with the goal of ensuring the defensibility of Bureau programs and access to fair treatment and equal opportunity for all CFPB employees.

9. On May 15, the CFPB and NTEU reached tentative agreement on a Collective Bargaining Agreement. As part of that agreement, the CFPB will discontinue use of its previous performance management system and move to a new, two-level performance management system for two fiscal years. The CFPB and NTEU have also agreed to continue partnering on these issues through a joint labor management working group, as well as a separate working

group focused on diversity and inclusion. The CFPB and NTEU will work jointly to develop a new performance management system for future use.

10. The CFPB has notified the NTEU that it will comprehensively remediate for performance rating disparities for fiscal year 2012[5] and fiscal year 2013. Having concluded that many categories of employees were subject to statistical disparities by the Bureau's performance management program, and given the widespread disparities observed across multiple employee characteristics, the Bureau has agreed to compensate employees who received a rating of 3 or 4 under the previous performance management program as though they had received a rating of 5. This remediation will not extend to Assistant Directors, Deputy Associate Directors, Associate Directors, the Chief of Staff, Deputy Director, and the Director. This remediation plan is the only way we can reasonably ensure that all statistical disparities caused by the previous performance management system are erased. Accordingly, we strongly believe that this decision is the soundest and most prudent action we can take to remediate these issues and better foster the culture of diversity and inclusion we aspire to and that our employees want and deserve.

11. Based on the findings of the OMWI Director's report and the findings of the third-party review, additional actions will be taken to address issues that may surface about equity, equal opportunity, fairness, and inclusion. The OMWI Director's report may also identify gaps and opportunities to strengthen CFPB's management programs.

    Potential categories of recommendations may include:

    - Fairness: Greater measures to ensure access to fair and equal opportunities for all of our diverse employees;
    - Communication and feedback practices: Additional measures to strengthen day-to-day direction and guidance to all employees; additional training and tools to build leadership and management capacity; stronger tools and oversight to maximize the value of mid-year and annual performance feedback and reviews; improved practices for creating effective teams and managing conflict and additional resources to further bolster official grievance processes;

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[5] A preliminary review of FY2012 data revealed similar statistical disparities across many different characteristics.

- Focused steps to strengthen organizational culture: Proactive measures to evaluate and solidify common organizational values, behaviors, and norms between managers and staff; improved management practices for building strong relationships and trust with employees; appropriate situational leadership coaching for optimal employee performance and individual development planning; and Bureau-wide efforts to promote greater knowledge and expertise in the areas of diversity and inclusion.

12. The CFPB also remains committed to continuing to review all individual allegations of discrimination through the EEO and administrative grievance processes. The CFPB will address such matters on their merits and take whatever steps are necessary to achieve equitable outcomes both in individual matters and in ensuring appropriate management of the agency.