pdri
an SHL Company

Analyses of BCFP Hiring Data: FY2011 – FY2017

October, 2018

PDRI, an SHL Company

1777 N Kent St, Suite 401

Arlington, VA 22209

voice: (703) 276-4680

fax: (703) 276-7567

e-mail: info@pdri.com

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1. BCFP Hiring Data Analyses: FY2011 – FY2017

1.1 Summary of Hiring Data Set

This report is the second analysis of BCFP hiring data. Initially, BCFP provided the PDRI team with hiring data for applicants from FY 2011 through FY 2015. These data were obtained through BCFP's talent acquisition system (Monster Analytics), which only contains data for applicants who applied to vacancy announcements posted on USAJobs.gov. This system does not include applicant data for BCFP executive positions, non-competitive hiring situations, or for certain hiring authorities outside the public posting process (e.g., Schedule A hiring for persons with disabilities). For the current report, BCFP provided the PDRI team with hiring data for applicants from FY 2015 through FY 2017. These data were obtained in the same manner as outlined above. These two data sets were combined to create one comprehensive dataset. When the timeframes in the datasets overlapped, the most recent data provided were used. This only occurred in data with Announcement close dates between October 2014 and February 2015.

The initial data pull from Monster Analytics included 214,416 application records, with posting open dates from FY 2011 through the beginning of FY 2015. The second data pull included 121,081 application records from FY 2015 through FY2017.

Table 1 provides a summary of the cleaned data set. This table also summarizes the announcement open (posted) dates and number of records by fiscal year.

TABLE 1: SUMMARY OF HIRING DATA SET, ALL JOBS INCLUDED

Fiscal Year	Min Close Date in Dataset	Max Close Date in Dataset	Fiscal Year Range	Number of Applicant Records
FY 2011-	3/31/11	9/28/12	10/1/10 to 9/30/12	74,588

2012				
FY 2013	10/2/12	9/30/13	10/1/12 to 9/30/13	47,906
FY 2014	10/2/13	9/30/14	10/1/13 to 9/30/14	60,990
FY 2015	10/1/14	9/30/15	10/1/14 to 9/30/15	48,357
FY 2016	10/3/15	9/28/16	10/1/15 to 9/30/16	45,708
FY 2017	10/1/16	9/29/17	10/1/16 to 9/30/17	25,452
Total				**303,001**

In the previous analysis, it was identified that 91% of the General Attorneys hired were done so outside of Monster Analytics. we considered the extent to which this data set might not adequately represent applicants who applied outside of Monster Analytics, and thus were absent from these data. Furthermore, General Attorneys represented almost 19% of BCFP's total workforce and almost 16% of the applicant records in the hiring data set. Because General Attorneys are so vastly underrepresented in the hiring data set, we decided to exclude this occupation from further analyses.

Table 2 provides a summary of the cleaned data set, after screening out duplicate records and removing the 43,519 records involving General Attorney applicants.

TABLE 2: SUMMARY OF HIRING DATA SET, GENERAL ATTORNEY APPLICANTS SCREENED OUT

| Fiscal Year	Min Close Date in Dataset	Max Close Date in Dataset	Fiscal Year Range	Number of Applicant Records
FY 2011-2012	3/31/11	9/28/12	10/1/10 to 9/30/12	63,329
FY 2013	10/2/12	9/30/13	10/1/12 to 9/30/13	41,375
FY 2014	10/2/13	9/30/14	10/1/13 to 9/30/14	52,460
FY 2015	10/1/14	9/30/15	10/1/14 to 9/30/15	39,064
FY 2016	10/3/15	9/28/16	10/1/15to 9/30/16	40,188
FY 2017	10/1/16	9/29/17	10/1/16 to	21,979

			9/30/17	
Total				**258,395**

1.2 Race/Ethnicity Data

During the application process, individuals were asked to voluntarily disclose demographic data. If an individual chose not to disclose demographic data, he or she was categorized as "Undefined." For the purposes of this report, "Undefined" is a separate category indicating race/ethnicity were not self-reported and are, therefore, unknown. We grouped the following race/ethnicity categories as "Other" due to the relatively small numbers of individuals typically found in each of these categories: (1) Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino), (2) American Indian or Alaska Native (Not Hispanic or Latino), and (3) Two or More Races (Not Hispanic or Latino). In addition to "Undefined" and "Other," results are reported for the following categories: (1) Hispanic or Latino, (2) Black or African American (Not Hispanic or Latino), (3) Asian (Not Hispanic or Latino), and (4) White (Not Hispanic or Latino). Figure 1 outlines the number of applications received from each race/ethnic group since 2013. Note the following results:

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FIGURE 1: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS FY 2013 THROUGH FY 2017
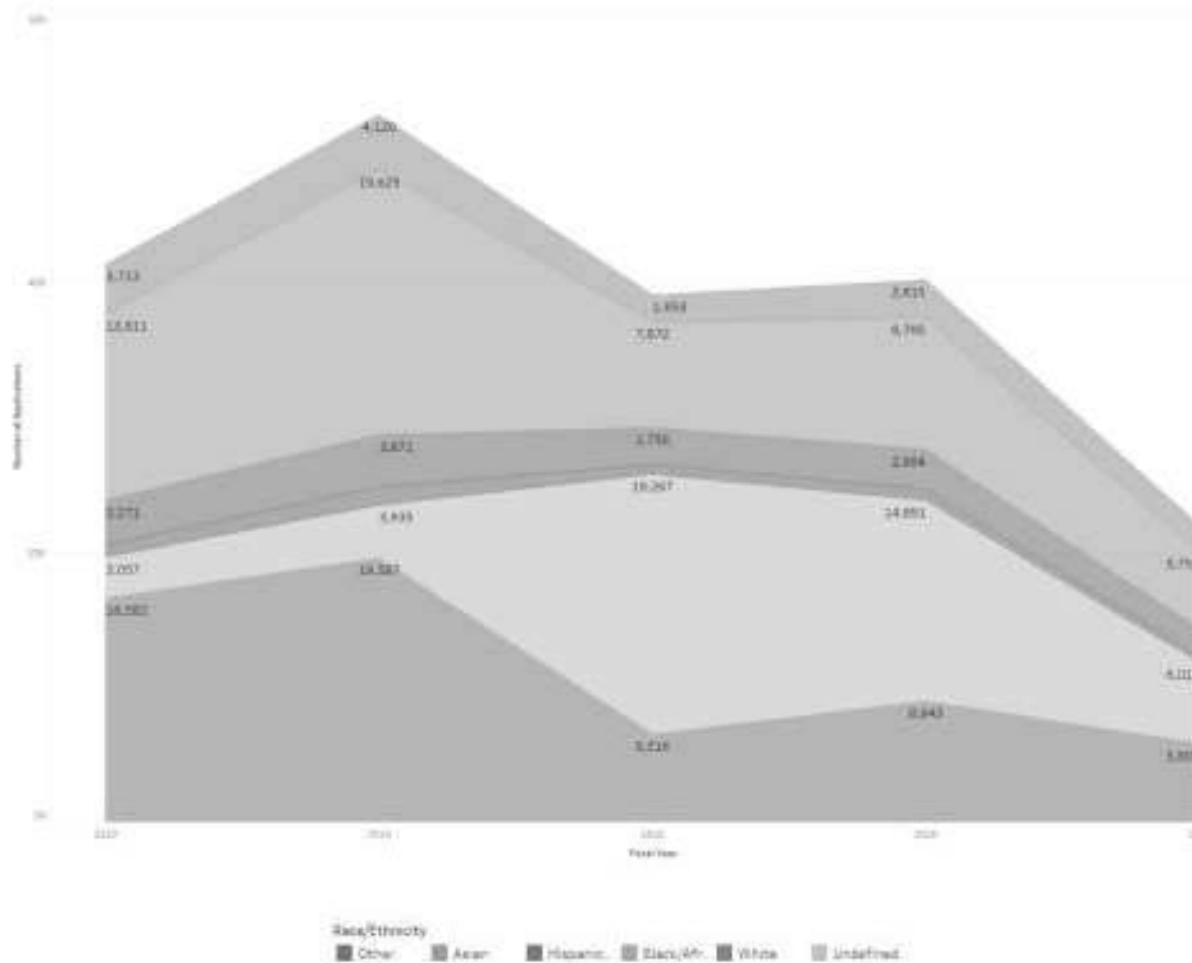
2. Hiring by Race/Ethnicity and Hiring Phase

We analyzed BCFP's hiring data for FY 2011 through FY 2017 based on the race/ethnicity of applicants for non-executive and non-general-attorney positions only. For the seven-year hiring period under review, we identified the latest hiring phase reached for each applicant. These four hiring phases are the same as those used in similar prior analyses and reflect application processing and assessment-related activities in what is often described as the hiring "funnel." Everyone who submitted at least one application to a particular posting was included in the "Applied" phase. Those applicants whose qualifications were evaluated and found to meet minimum qualifications were considered "Eligible." Applicants whose assessment results were sufficiently strong based on the relevant evaluation criteria were considered in the "Best Qualified" phase. Finally, all applicants offered an employment opportunity were in the "Selected" phase. 4,077 applicant records did not have sufficient data to identify the hiring phase, typically due to the proximity of the end of the fiscal year, and those were marked as unknown. This left a total of 254,318 records to be used in the analysis.

The four hiring phases were defined and had total sample sizes as follows:

- **Applied:** 69,454 applicants, declared ineligible (i.e., failed to meet minimum qualifications) and did not progress beyond applicant status. 254,318 grand total Applied.
- **Eligible:** 115,374 applicants, declared eligible (i.e., met minimum qualifications) but did not progress to well qualified or best qualified status. 184,864 grand total Eligible.
- **Best Qualified:** 67,364 applicants, declared among the pool of well qualified[1] or best qualified candidates, but were not selected. 69,490 in total Best Qualified.
- **Selected:** 2,126 applicants who were selected and offered a position, including those who were selected and declined, and those who were selected and then hired.

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[1] The "well qualified" designation is used relatively infrequently, and only in cases where the "best qualified" applicant pool is too small. Therefore, in practice, "well qualified" and "best qualified" applicants are treated the same in terms of hiring process and decision-making.

Results for 254,318 applicants for FY 2011 through FY 2017 are summarized in Figure 2. Size limits prohibit all data labels from displaying in the figure. Appendix A contains all of the numbers in table form. Note the following results:
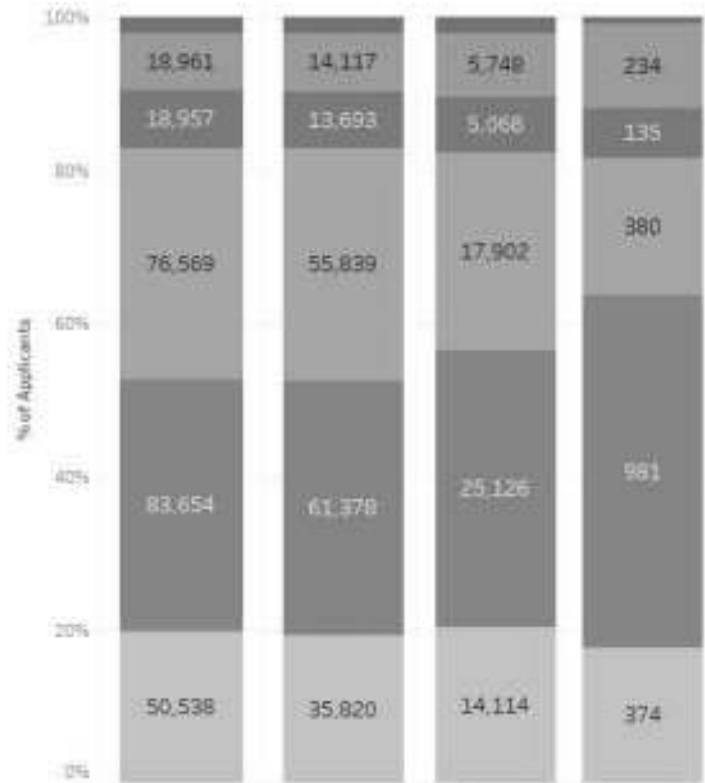
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FIGURE 2: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY RACE/ETHNICITY AND HIRING PHASE, FY 2011 – FY 2017 COMBINED

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.2%	2.2%	1.0%
Asian	7.5%	7.6%	8.3%	11.0%
Hispanic/Latino	7.5%	7.4%	7.3%	6.3%
Black/African American	30.1%	30.2%	25.8%	17.9%
White	32.9%	33.2%	36.2%	46.1%
Undefined	19.9%	19.4%	20.3%	17.6%

2.1 Hiring by Job Group

Next, we investigated the extent to which the race/ethnicity profiles by hiring phase were consistent across job groups, defined by occupation series. We wanted to know, for example,

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(b)(5) Figure 2

shows race/ethnicity profiles by hiring phase for eight of the occupations with the largest applicant pools: Economists (occupation series 0110), Examiners (0570), Administrative Assistants (0303), Information Technology (IT) Specialists (2210), CFP Analysts (1101),

Paralegals (0950) and Miscellaneous Administration and Program Series (0301). Several of these occupations are also defined as the BCFP's mission critical occupations (Economist, Examiners, and Miscellaneous Administration and Program Series). Attorneys (0905) are also considered a mission critical occupation but were not included due to the reasons mentioned earlier in the report. Therefore, further exploration of hiring in these groups was particularly important. Notable results in Figure 2 include the following (see Appendix A for tabulated data)[a]:

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[a] Throughout the report, missing tabular data is equivalent to 0%

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(b)(5)

FIGURE 3: APPLICANTS FOR NON-EXECUTIVE POSITIONS BY JOB GROUP[3], RACE/ETHNICITY, AND HIRING PHASE, FY 2011 – FY 2017 COMBINED

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[3] "Other" includes all non–executive jobs except attorneys, economists, examiners, miscellaneous administration and program series, and paralegals.

	Applied	Eligible	Best Qualified	Selected
Misc. Administration and Program Series (n=81,744)				
Other	2.2%	2.3%	2.4%	1.1%
Asian	6.3%	6.4%	5.8%	9.3%
Hispanic/Latino	7.2%	7.0%	7.3%	5.4%
Black/African Americ.	31.0%	31.0%	28.7%	20.8%
White	31.7%	32.6%	32.2%	42.9%
Undefined	21.6%	20.6%	23.6%	20.6%
Other (n=65,386)				
Other	2.2%	2.1%	2.1%	0.7%
Asian	6.8%	6.8%	7.8%	14.7%
Hispanic/Latino	7.0%	7.0%	6.8%	5.2%
Black/African Americ.	32.1%	32.4%	27.3%	15.1%
White	30.2%	31.0%	33.7%	45.7%
Undefined	21.7%	20.7%	22.4%	18.6%
Examiners (n=38,551)				
Other	2.2%	2.1%	2.3%	1.3%
Asian	7.6%	7.9%	8.3%	8.2%
Hispanic/Latino	8.2%	8.4%	8.0%	7.4%
Black/African Americ.	25.4%	24.6%	21.5%	17.0%
White	40.9%	40.2%	45.1%	51.0%
Undefined	15.6%	16.8%	14.8%	15.0%
Administrative Assistants (n=19,141)				
Other	2.5%	2.5%	2.3%	2.9%
Asian	5.3%	5.3%	4.6%	7.7%
Hispanic/Latino	8.2%	8.0%	7.3%	7.7%
Black/African Americ.	45.1%	46.3%	43.2%	45.2%
White	22.4%	21.8%	25.1%	23.1%
Undefined	16.6%	16.2%	17.6%	13.5%
IT (n=18,377)				
Other	2.3%	2.2%	2.3%	
Asian	15.1%	15.4%	14.1%	12.2%
Hispanic/Latino	6.9%	7.0%	7.3%	4.4%
Black/African Americ.	19.8%	19.8%	21.0%	8.8%
White	29.3%	30.1%	32.3%	54.6%
Undefined	26.6%	25.5%	23.0%	20.0%
CFP Analyst (n=16,094)				
Other	2.2%	2.1%	2.2%	0.8%
Asian	8.4%	8.7%	7.9%	13.3%
Hispanic/Latino	8.1%	8.1%	7.9%	10.9%
Black/African Americ.	26.7%	26.3%	25.0%	16.4%
White	41.1%	41.8%	45.1%	46.1%
Undefined	13.6%	13.1%	12.0%	12.5%
Paralegals (n=10,502)				
Other	1.9%	1.8%	1.7%	3.3%
Asian	7.4%	7.6%	9.5%	16.7%
Hispanic/Latino	8.2%	8.3%	7.9%	6.7%
Black/African Americ.	29.2%	28.2%	21.3%	20.0%
White	37.7%	38.9%	48.6%	40.0%
Undefined	15.6%	15.1%	11.0%	13.3%
Economists (n=3,941)				
Other	1.4%	1.6%	1.4%	
Asian	13.5%	13.9%	12.7%	13.5%
Hispanic/Latino	6.2%	6.3%	5.9%	13.5%
Black/African Americ.	15.9%	13.9%	9.2%	5.4%
White	43.8%	46.3%	45.1%	54.1%
Undefined	19.1%	18.0%	25.7%	13.5%

Race/Ethnicity
Other   Asian   Hispanic…   Black/Afr.   White   Undefined

2.2 Hiring by Fiscal Year

Next, we investigated the extent to which the race/ethnicity profiles by hiring phase were consistent from one fiscal year to the next. (b)(5)

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Figure 4 shows the average percentage point difference between percent of Eligible Applicants and the percent of Selected applicants by race/ethnicity. Figure 5 shows race/ethnicity profiles by hiring phase by fiscal year, including results for FY 2011-2012 (combined because 2011 was not a full year), through FY 2017. Notable results for both included the following:
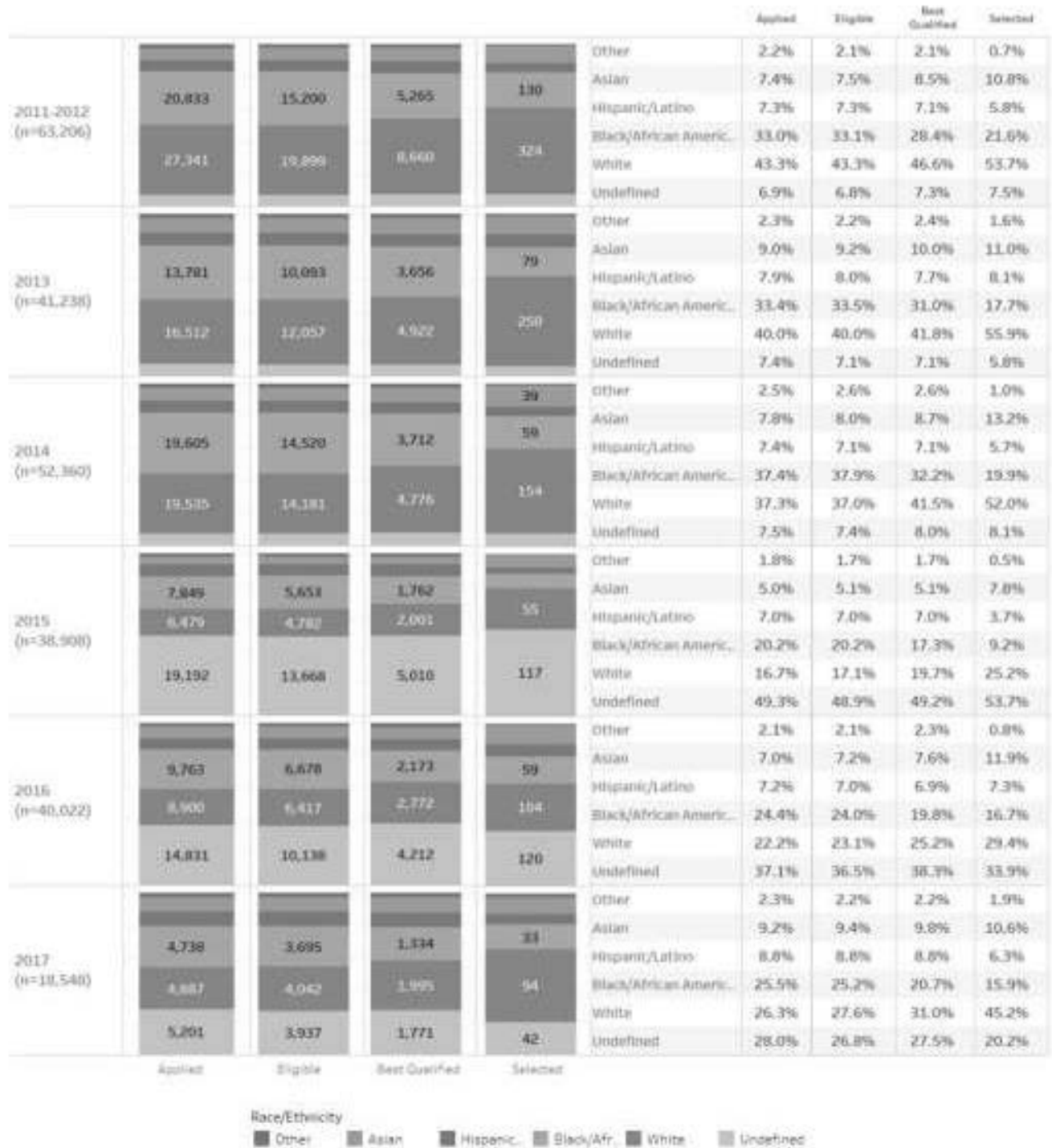
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Ethnicity	Fiscal Year	Difference Between % Eligible and % Selected	Ethnicity	Fiscal Year	Difference Between % Eligible and % Selected
Asian	2011-2012	3.3	Other	2011-2012	-1.4
	2013	1.8		2013	-0.7
	2014	5.1		2014	-1.6
	2015	2.7		2015	-1.2
	2016	4.6		2016	-1.3
	2017	1.1		2017	-0.2
Asian Avg. Distance		3.1	Other Avg. Distance		-1.1
Black/African American	2011-2012	-11.5	Undefined	2011-2012	0.7
	2013	-15.8		2013	-1.2
	2014	-17.9		2014	0.7
	2015	-11.0		2015	4.8
	2016	-7.4		2016	-2.6
	2017	-9.3		2017	-6.7
Black/African Avg. Distance		-12.2	Undefined Avg. Distance		-0.7
Hispanic/ Latino	2011-2012	-1.5	White	2011-2012	10.5
	2013	0.1		2013	15.9
	2014	-1.4		2014	15.0
	2015	-3.4		2015	8.1
	2016	0.3		2016	6.3
	2017	-2.5		2017	17.6
Hispanic/Latino Avg. Distance		-1.4	White Avg. Distance		12.2

FIGURE 5: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY FISCAL YEAR, RACE/ETHNICITY, AND HIRING PHASE, FY 2011 – FY 2017

Year	Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
2011-2012 (n=63,206)	Other	2.2%	2.1%	2.1%	0.7%
	Asian	7.4%	7.5%	8.5%	10.8%
	Hispanic/Latino	7.3%	7.3%	7.1%	5.8%
	Black/African Americ.	33.0%	33.1%	28.4%	21.6%
	White	43.3%	43.3%	46.6%	53.7%
	Undefined	6.9%	6.8%	7.3%	7.5%
2013 (n=41,238)	Other	2.3%	2.2%	2.4%	1.6%
	Asian	9.0%	9.2%	10.0%	11.0%
	Hispanic/Latino	7.9%	8.0%	7.7%	8.1%
	Black/African Americ.	33.4%	33.5%	31.0%	17.7%
	White	40.0%	40.0%	41.8%	55.9%
	Undefined	7.4%	7.1%	7.1%	5.8%
2014 (n=52,360)	Other	2.5%	2.6%	2.6%	1.0%
	Asian	7.8%	8.0%	8.7%	13.2%
	Hispanic/Latino	7.4%	7.1%	7.1%	5.7%
	Black/African Americ.	37.4%	37.9%	32.2%	19.9%
	White	37.3%	37.0%	41.5%	52.0%
	Undefined	7.5%	7.4%	8.0%	8.1%
2015 (n=38,900)	Other	1.8%	1.7%	1.7%	0.5%
	Asian	5.0%	5.1%	5.1%	7.8%
	Hispanic/Latino	7.0%	7.0%	7.0%	3.7%
	Black/African Americ.	20.2%	20.2%	17.3%	9.2%
	White	16.7%	17.1%	19.7%	25.2%
	Undefined	49.3%	48.9%	49.2%	53.7%
2016 (n=40,022)	Other	2.1%	2.1%	2.3%	0.8%
	Asian	7.0%	7.2%	7.6%	11.9%
	Hispanic/Latino	7.2%	7.0%	6.9%	7.3%
	Black/African Americ.	24.4%	24.0%	19.8%	16.7%
	White	22.2%	23.1%	25.2%	29.4%
	Undefined	37.1%	36.5%	38.3%	33.9%
2017 (n=18,540)	Other	2.3%	2.2%	2.2%	1.9%
	Asian	9.2%	9.4%	9.8%	10.6%
	Hispanic/Latino	8.8%	8.8%	8.8%	6.3%
	Black/African Americ.	25.5%	25.2%	20.7%	15.9%
	White	26.3%	27.6%	31.0%	45.2%
	Undefined	28.0%	26.8%	27.5%	20.2%

Race/Ethnicity: Other, Asian, Hispanic, Black/Afr., White, Undefined

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2.3 Likelihood of Selection by Fiscal Year

Similarly, we wanted to see this data in a different manner to better understand selection rates over time. Figure 6 shows the likelihood of being selected based upon race/ethnicity from FY 2013 to FY 2017. In other words, what percentage of total applicants from each race/ethnicity were selected each year. Notable results in Figure 6 include the following (see Appendix A for tabulated data):

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FIGURE 6: SELECTION RATES FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY FISCAL YEAR, RACE/ETHNICITY, AND HIRING PHASE, FY 2013 – FY 2017
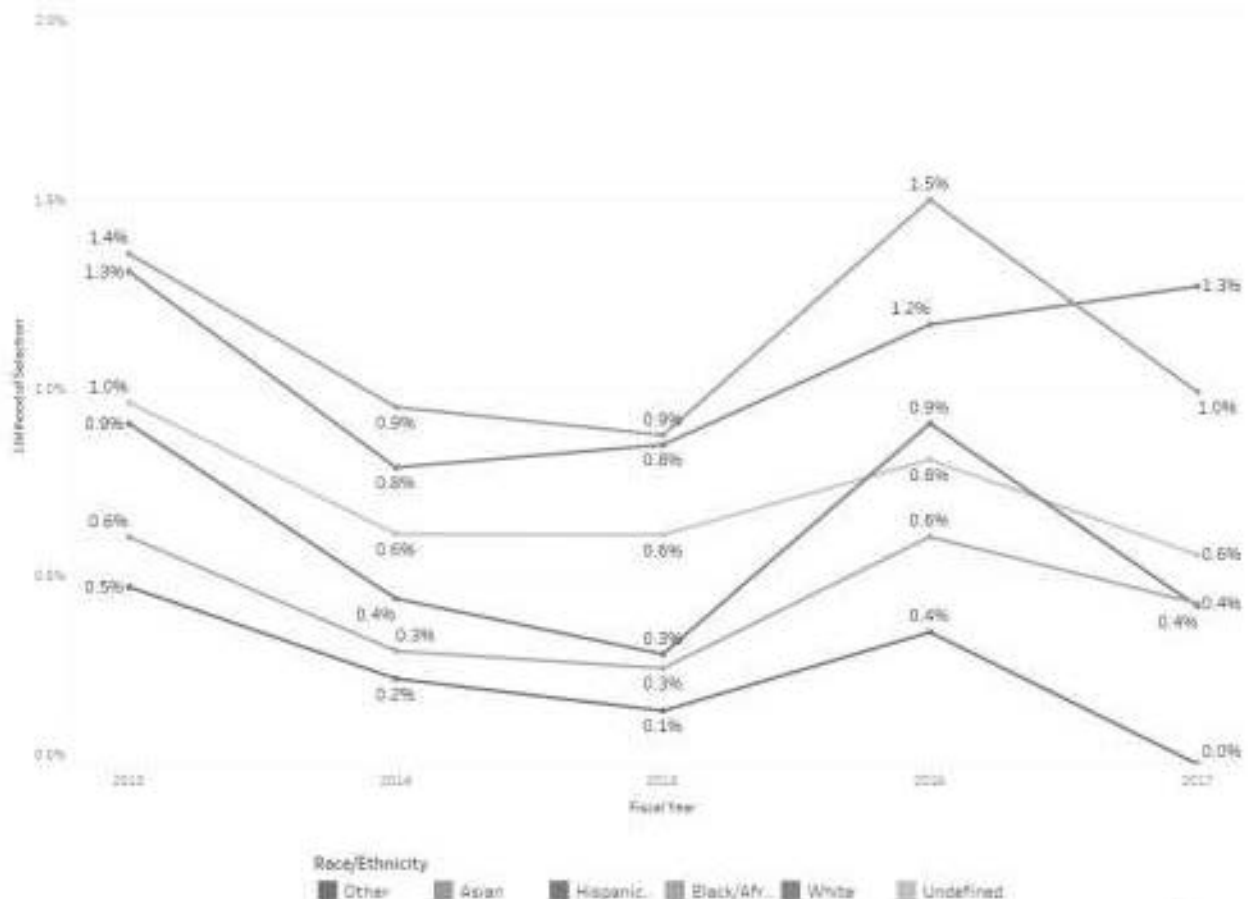
3. Other Explanations: Underlying Factors

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3.1 Applicant Self-Selection

Of the 148,874 applicant records after FY 2013[4], 11.7% self-selected out at some point during the hiring process, compared to 85% who did not self-select out, 3% that were canceled announcements, and 0.3% unknown. The remainder of this section will not include those that were canceled or unknown. For this analysis, "self-selected out" included applicants who removed themselves from consideration for any reason, including failure to complete all application requirements (e.g., no resume, no transcript, not completing required assessments) and declining interview or job offers for any reason. The majority of those who self-selected out

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[4] Non-Executive and non-Attorney positions, excluding announcements that were cancelled; Self-selection data was not available until FY 2014

did so in not completing and/or submitting application materials. Formal declinations were a much smaller group of applicants who self-selected out.

Figure 7 shows the self-select out breakdown of all FY 2014 – FY 2017 applicants by race/ethnicity. Note the following:

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- o Undefined: 13.7% self-selected out
- o Hispanic/Latino: 12.4% self-selected out
- o Black/African American: 12.2% self-selected out
- o Asian: 11.3% self-selected out
- o Other: 11.1% self-selected out
- o White: 10.5% self-selected out

FIGURE 7: RACE/ETHNICITY REPRESENTATION, AMONG ALL APPLICANTS[5] AND AMONG APPLICANTS WHO SELF-SELECTED OUT OF THE HIRING PROCESS, FY 2014-2017
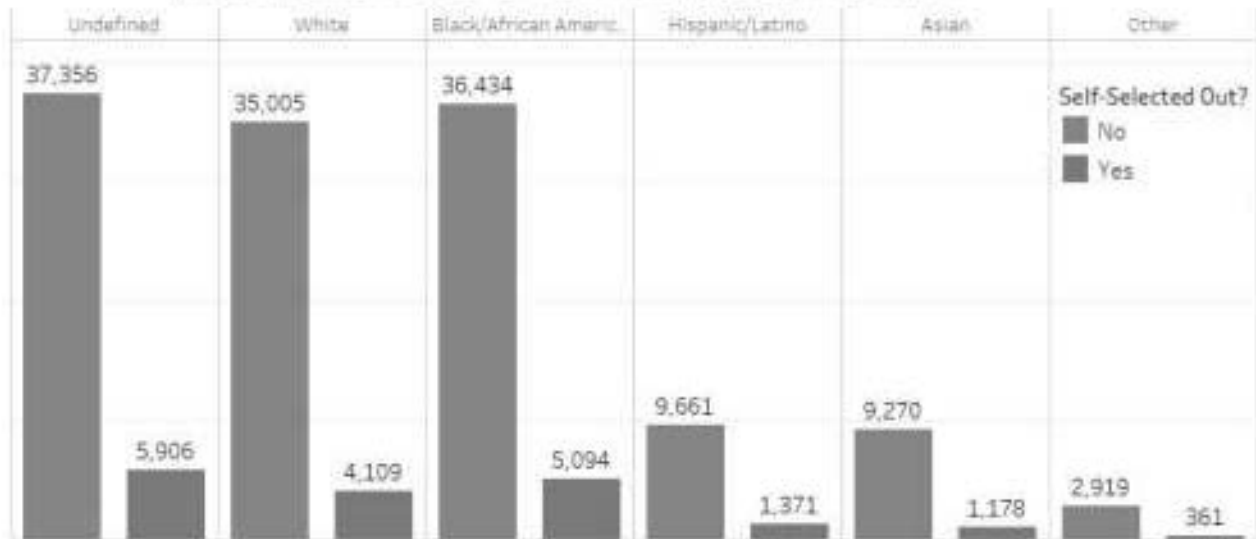
FY 2014 – FY 2017 patterns for representation by ethnicity and hiring phase remain the same after excluding those applicants who self-selected out of the hiring process. Figure 8 shows the results within job groups. Tabulated data corresponding to these figures appears in Appendix A.

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[5] Non-Executive and non-Attorney positions, excluding announcements that were cancelled

FIGURE 8: APPLICANTS FOR NON-EXECUTIVE POSITIONS BY JOB GROUP, RACE/ETHNICITY, AND HIRING PHASE, EXCLUDING THOSE WHO SELF-SELECTED OUT, FY 2014 – FY 2017

Misc. Administration and Program Series (n=42,297)

Bar values — Applied: 11,207 / 11,852 / 13,516; Eligible: 8,956 / 8,994 / 10,511; Best Qualified: 2,577 / 2,960 / 3,705; Selected: 39 / 89 / 88

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.2%	2.3%	0.4%
Asian	6.2%	6.4%	5.3%	8.8%
Hispanic/Latino	7.0%	6.8%	7.0%	4.8%
Black/African Americ...	26.5%	26.6%	23.8%	15.5%
White	26.1%	26.7%	27.3%	35.5%
Undefined	32.0%	31.2%	34.2%	35.1%

Other (n=36,524)

Bar values — Applied: 10,625 / 8,589 / 10,631; Eligible: 9,046 / 8,229 / 8,730; Best Qualified: 2,749 / 3,753 / 3,920; Selected: 54 / 53 / 127 / 87

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	2.1%	2.0%	1.8%	0.3%
Asian	6.3%	6.4%	7.8%	16.0%
Hispanic/Latino	7.2%	7.1%	7.0%	4.5%
Black/African Americ...	29.1%	29.4%	22.0%	15.7%
White	26.3%	26.7%	30.1%	37.7%
Undefined	29.1%	28.4%	31.4%	25.8%

Examiners (n=18,440)

Bar values — Applied: 4,983 / 6,226 / 3,912; Eligible: 5,705 / 4,465 / 3,251; Best Qualified: 1,163 / 1,764 / 1,105; Selected: 43 / 99 / 68

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	2.5%	2.4%	2.7%	2.0%
Asian	7.0%	7.1%	6.7%	8.3%
Hispanic/Latino	8.5%	8.8%	8.7%	6.3%
Black/African Americ...	27.0%	26.5%	23.6%	17.1%
White	33.8%	31.9%	35.0%	39.3%
Undefined	21.2%	23.3%	22.5%	27.0%

Administrative Assistants (n=12,379)

Bar values — Applied: 5,607 / 2,378 / 2,537; Eligible: 4,095 / 1,763 / 2,131; Best Qualified: 823 / 338 / 446; Selected: 19 / 10

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	2.6%	2.6%	2.5%	7.7%
Asian	4.3%	4.2%	3.2%	7.7%
Hispanic/Latino	8.1%	7.4%	7.5%	5.1%
Black/African Americ...	45.3%	46.9%	44.7%	48.7%
White	19.2%	17.6%	17.9%	5.1%
Undefined	20.5%	21.3%	24.2%	25.6%

IT (n=13,496)

Bar values — Applied: 2,014 / 2,391 / 3,584 / 4,244; Eligible: 1,710 / 1,994 / 3,076 / 3,503; Best Qualified: 1,163 / 1,811 / 1,900; Selected: 61 / 34

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.2%	2.3%	
Asian	14.9%	15.1%	13.0%	10.4%
Hispanic/Latino	7.2%	7.2%	7.6%	5.6%
Black/African Americ...	17.7%	17.6%	18.4%	8.0%
White	26.6%	27.1%	28.6%	48.8%
Undefined	31.4%	30.9%	30.0%	27.2%

CFP Analyst (n=6,471)

Bar values — Applied: 1,628 / 2,242 / 1,494; Eligible: 1,263 / 1,778 / 1,125; Best Qualified: 204 / 335 / 209; Selected: 7 / 17 / 8

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	2.1%	2.0%	2.8%	2.5%
Asian	7.3%	7.5%	6.7%	10.0%
Hispanic/Latino	7.7%	7.6%	6.9%	17.5%
Black/African Americ...	25.2%	25.1%	21.1%	7.5%
White	34.6%	35.3%	34.6%	42.5%
Undefined	23.1%	22.4%	27.8%	20.0%

Paralegals (n=2,889)

Bar values — Applied: 803 / 605 / 1,010; Eligible: 752 / 535 / 931; Best Qualified: 196 / 162 / 196; Selected: 2 / 3 / 2 / 4

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	1.9%	1.9%	2.8%	
Asian	4.4%	4.4%	5.1%	8.3%
Hispanic/Latino	7.9%	8.1%	6.1%	16.7%
Black/African Americ...	29.9%	29.0%	34.1%	25.0%
White	20.9%	20.6%	17.8%	16.7%
Undefined	35.0%	35.9%	34.1%	33.3%

Economists (n=1,540)

Bar values — Applied: 627 / 459; Eligible: 582 / 403; Best Qualified: 489 / 373; Selected: 3 / 10 / 4

Race/Ethnicity	Applied	Eligible	Best Qualified	Selected
Other	1.6%	1.6%	1.5%	
Asian	11.7%	11.5%	10.6%	10.0%
Hispanic/Latino	6.2%	6.3%	6.1%	15.0%
Black/African Americ...	10.1%	9.7%	9.0%	5.0%
White	40.7%	41.9%	41.3%	50.0%
Undefined	29.8%	29.0%	31.5%	20.0%

Column labels (bottom axis): Applied · Eligible · Best Qualified · Selected

Race/Ethnicity legend: ■ Other ■ Asian ■ Hispanic ■ Black/Afr... ■ White ▨ Undefined

3.2 Hiring Manager Interviews

The main hiring activities that take place between Best Qualified and Selected are inviting applicants to interview, conducting and making decisions based on interviews, and conducting reference checks for applicants in consideration for selection.

Starting in FY 2014, structured interview procedures were recommended but not required. The next question we examined was whether there were race/ethnicity disparities in terms of who was invited to interview from FY 2014 – FY 2017. Applicant status codes were used to determine which applicants were and were not invited to interview. This approach was imperfect because interview status could not always be determined and managers have the option to direct hire from a resume, forgoing the interview. However, in these instances, the individual was still marked as invited to interview. FY 2014 – FY 2017 applicants included the following counts in each interview status category:

- 75,756 applicants referred but not invited to interview[6]
- 16,581 applicants referred and invited to interview[7]
- 22,051 applicants not referred and not invited[8]
- 4,591 applicants on announcements that were cancelled
- 17,778 applicants who self-selected out prior to the interview stage[9]
- 17,380 applicants with interview status unknown[10]

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[6] Applicant status codes: BQ-NN, Eligible-NRNA, or Eligible-NRNR

[7] Applicant status codes: Declined, Hired, or Selected

[8] Applicant status code: Ineligible-INEL, Ineligible-NQEE, Ineligible-NQSE

[9] Applicant status codes: Ineligible (FR, INC, INR, IOTH, ISF5, ITRA, NQSS); or Declined-WITH

Figure 9 shows race/ethnicity representation among all applicants and by interview status for FY 2014 – FY 2017, excluding applicants on cancelled announcements, those who self-selected out prior to the interview stage, and those with interview status unknown. Key findings:

FIGURE 9: PERCENTAGE OF EACH RACE/ETHNICITY REPRESENTATION[11] BY INTERVIEW STATUS, FY 2014 – FY 2017
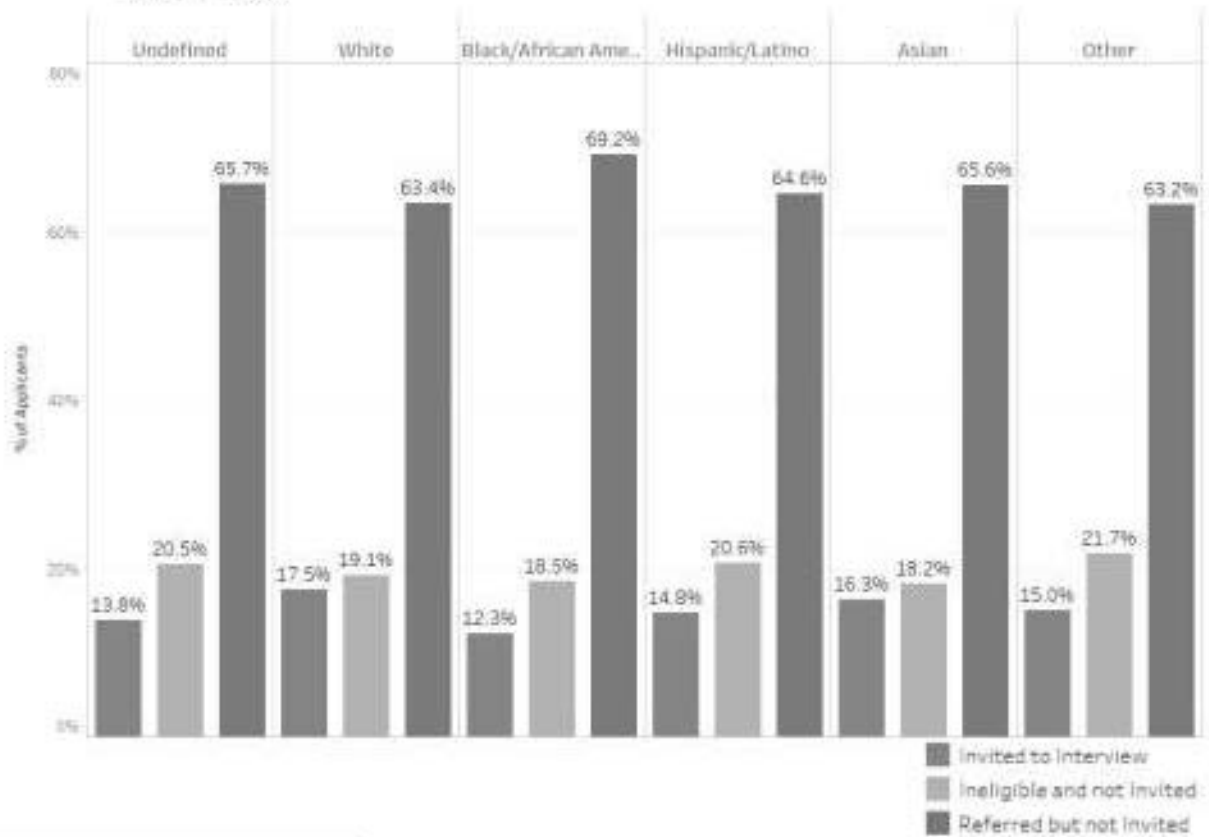
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[10] Applicant status codes: BQ-BQ, BQ-BQCP, BQ-BQCS, BQ-BQTP, BQ-BQXP, BQ-NCBQ, BQ-NS, BQ-SME, Eligible-NEW, Eligible-REV, Ineligible-NEW, Ineligible-NTIG, WQ-CATB, WQ-NEW

3.3 Applicant Referral

Up to this point, results have focused on four hiring phases: Applied, Eligible, Best Qualified (includes Well Qualified), and Selected (includes Hired). There is another hiring phase in between Best Qualified and Selected, and we examined this next.

Among applicants classified as Best Qualified, one of two things can happen. They are either (1) referred and placed on a hiring manager's certificate of eligible, or (2) they are not referred and thus not placed on a certificate. Applicants must appear on a hiring manager's certificate in order to be considered for an interview and have the chance to be Selected. Hiring managers do not see applicants who are not placed on to a hiring manager's certificate. This determination – referred or not referred – is outside the discretion of hiring managers' ability to influence decision making.

Federal hiring rules defined under Category Rating specific the conditions under which an applicant may be placed on a hiring manager certificate (aka referral). Referral for hiring under delegated examining rules is often influenced by eligibility for veterans' preference[12]. Under Category Rating rules, an applicant may not be referred if an equally qualified veteran or a veteran with a service-connect disability has been assessed and placed into the same quality category. In a smaller number of other circumstances govern the referral of applicants on a certificate of eligible for selection consideration.

To understand better the influence under the direct control of BCFP hiring managers, we added a "Referred" hiring phase for the sake of analyses described in this section. Data for these analyses were pulled for FY 2014 – FY2017, including certificate-level data. The same steps discussed earlier were used to prepare the data (e.g., coding new variables such as race/ethnicity and job group). For this analysis, we were interested in discovering the relative influence of Category Rating procedures on the observed changes in the demographic profile of applicants between the Best Qualified and Selected phases. Applicants who were classified Best Qualified

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[11] Non-Executive and non-Attorney positions; all counts exclude applicants who self-selected out prior to the interview phase

[12] Eligibility rules for veterans' preference in hiring are defined for applicants who can demonstrate former military service in specific military campaigns or time periods, and/or who suffered a service connected disability. Information about eligibility for veterans' preference is provide for under Title V of the U.S. Code. Additional information about Category Rating procedures is available under OPM Delegated Examining guidance.

and assigned to a hiring manager's certificate were coded as "Referred" for latest hiring phase reached. Otherwise, they remained coded as "Best Qualified."

We analyzed BCFP's certificate-level hiring data for FY 2014 – FY 2017 based on the race/ethnicity of applicants for non-executive and non-general-attorney positions only. The five hiring phases were defined and had total sample sizes as follows:

- **Applied:** 41,107 applicants, declared ineligible (i.e., failed to meet minimum qualifications) and did not progress beyond applicant status. 149,874 grand total Applied.
- **Eligible:** 69,628 applicants, declared eligible (i.e., met minimum qualifications) but did not progress to well qualified or best qualified status. 108,767 grand total Eligible.
- **Best Qualified:** 25,892 applicants, declared among the pool of well qualified or best qualified candidates, but were not referred. 39,139 grant total Best Qualified.
- **Referred:** 12,171 applicants, placed on a hiring manager's certificate and thus available to be considered for interview, but were not selected. 13,247 grand total Referred.
- **Selected:** 1,076 applicants who were selected and offered a position, including those who were selected and declined, and those who were selected and then hired.

Results for 149,874 applicants for FY 2014 – FY 2017 are summarized in Figure 10. We noted the following:

(b)(5)

FIGURE 10: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY RACE/ETHNICITY AND 5 HIRING PHASES, FY 2014 – FY 2017

Race/Ethnicity	Applied	Eligible	Best Qualified	Referred	Selected
Other	2.2%	2.2%	2.2%	2.2%	1.0%
Asian	7.0%	7.3%	7.6%	4.8%	11.2%
Hispanic/Latino	7.4%	7.3%	7.3%	7.3%	5.9%
Black/African American	28.0%	28.1%	22.0%	22.3%	15.9%
White	26.6%	27.1%	29.5%	22.0%	37.8%
Undefined	28.8%	28.1%	30.4%	41.5%	28.2%
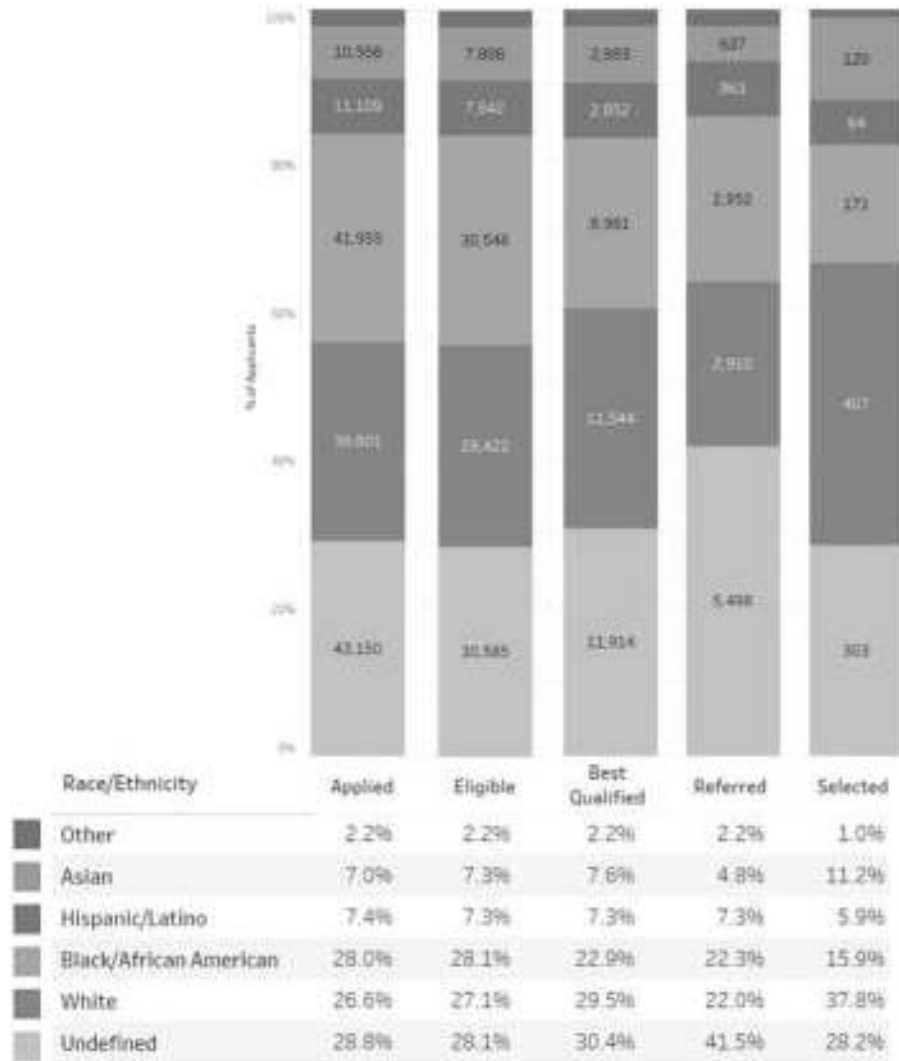
3.4 Hiring by Job Group, Race/Ethnicity, and Hiring Phase (Referred Phase Added)

Finally, we further examined hiring results across five phases, within job groups. Notable results in Figure 11 include the following:

(b)(5)

FIGURE 11: APPLICANTS FOR NON-EXECUTIVE POSITIONS BY JOB GROUP[13], RACE/ETHNICITY, AND 5 HIRING PHASES, FY 2014 – 2017

Job Group	Race/Ethnicity	Applied	Eligible	Best Qualified	Referred	Selected
Misc. Administration and Program Series (n=46,771)	Other	2.2%	2.2%	2.3%	2.2%	0.4%
	Asian	6.2%	6.4%	5.3%	4.2%	8.8%
	Hispanic/Latino	7.0%	6.8%	7.0%	7.1%	4.8%
	Black/African Americ...	26.5%	26.6%	23.0%	21.1%	15.5%
	White	26.1%	26.7%	27.3%	21.3%	35.5%
	Undefined	32.0%	31.2%	34.2%	44.2%	35.1%
Other (n=61,533)	Other	2.1%	2.0%	1.8%	1.6%	0.3%
	Asian	6.3%	6.4%	7.8%	4.2%	16.0%
	Hispanic/Latino	7.2%	7.1%	7.0%	6.8%	4.5%
	Black/African Americ...	29.1%	29.4%	22.0%	22.6%	15.7%
	White	26.3%	26.7%	30.1%	20.5%	37.7%
	Undefined	29.1%	28.4%	31.4%	44.3%	25.8%
Examiners (n=21,643)	Other	2.5%	2.4%	2.7%	3.0%	2.0%
	Asian	7.0%	7.1%	6.7%	5.6%	8.3%
	Hispanic/Latino	8.5%	8.0%	8.7%	9.1%	6.3%
	Black/African Americ...	27.0%	26.5%	23.6%	21.4%	17.1%
	White	33.8%	31.9%	35.8%	28.6%	39.3%
	Undefined	21.2%	23.3%	22.5%	32.3%	27.0%
Administrative Assistants (n=13,532)	Other	2.6%	2.6%	2.5%	2.9%	7.7%
	Asian	4.3%	4.2%	3.2%	2.0%	7.7%
	Hispanic/Latino	8.1%	7.4%	7.5%	6.4%	5.1%
	Black/African Americ...	45.3%	46.9%	44.7%	37.8%	48.7%
	White	19.2%	17.6%	17.9%	11.7%	5.1%
	Undefined	20.5%	21.3%	24.2%	39.1%	25.6%
IT (n=14,410)	Other	2.2%	2.2%	2.3%	1.1%	
	Asian	14.3%	15.1%	13.0%	13.9%	10.4%
	Hispanic/Latino	7.2%	7.2%	7.6%	5.5%	5.6%
	Black/African Americ...	17.7%	17.6%	18.4%	9.0%	8.0%
	White	26.8%	27.1%	28.6%	27.5%	48.8%
	Undefined	31.4%	30.9%	30.0%	43.0%	27.2%
CHP Analyst (n=6,864)	Other	2.1%	2.0%	2.8%	1.9%	2.5%
	Asian	7.3%	7.5%	6.7%	7.9%	10.0%
	Hispanic/Latino	7.7%	7.6%	6.9%	6.5%	17.5%
	Black/African Americ...	25.2%	25.1%	21.1%	17.2%	7.5%
	White	34.8%	35.3%	34.6%	24.5%	42.5%
	Undefined	23.1%	22.4%	27.8%	42.0%	20.0%
Paralegals (n=3,301)	Other	1.9%	1.9%	2.8%	1.2%	
	Asian	4.4%	4.4%	5.1%	4.9%	8.3%
	Hispanic/Latino	7.9%	8.1%	8.1%	7.4%	16.7%
	Black/African Americ...	29.9%	29.0%	34.1%	31.4%	25.0%
	White	20.5%	20.6%	17.8%	14.6%	16.7%
	Undefined	35.0%	35.9%	34.1%	38.5%	33.3%
Economists (n=1,900)	Other	1.6%	1.6%	1.5%	2.2%	
	Asian	11.7%	11.5%	10.6%	13.0%	10.0%
	Hispanic/Latino	6.2%	6.3%	6.1%	13.0%	15.0%
	Black/African Americ...	10.1%	9.7%	9.0%	8.7%	5.0%
	White	40.7%	41.9%	41.3%	30.1%	50.0%
	Undefined	29.8%	29.0%	31.5%	23.9%	20.0%

Applied Eligible Best Qualified Referred Selected

Race/Ethnicity
■ Other ■ Asian ■ Hispanic... ■ Black/Afr. ■ White ☐ Undefined

[13] "Other" includes all non-executive jobs except attorneys and those explicitly listed

4. Adverse Impact Analyses

The results presented thus far describe the consistency of applicant flow within demographic groups across each phase of the selection process. Another approach is to examine differences between traditional majority (i.e., White) and traditional minority (in this case, Black, Hispanic, Asian, and Other or Undefined) racial/ethnic subgroups using statistical tests and standards. The *Uniform Guidelines on Employee Selection Procedures* (EEOC, 1978) recommend using the 4/5 standard and statistical significance to examine differences. The 4/5 standard is based on Adverse Impact Ratios (AIRs). AIRs are ratios between the proportion of people in a target group (e.g., Black employees) and the proportion of people in another group (e.g., White employees) who are hired or successfully advance from one phase to another. An AIR <.80 is considered a violation of the 4/5 standard, indicating that the pass rate is notably lower for the target group. For example, if 70% of Black applicants and 90% of White applicants were hired, the resulting AIR would be .77 (i.e., 70%/90%), which falls below the 4/5 standard.

The AIR is constant regardless of group size; in the previous example, the AIR would be .77 if there were 7 Black and 9 White applicants, but also if there were 700 Black and 900 White applicants. Statistical significance, on the other hand, takes group size into account. As group size grows, we have more confidence in the ability to detect small differences. The *Guidelines* state that small differences may be evidence of adverse impact when "large numbers of selections are made," and provide an example of a small but statistically significant difference in hiring rates based on national-level data. However, they do not provide guidelines regarding thresholds for numbers being considered large; judgment is necessary when evaluating statistical significance results. The present analyses utilize chi-square (χ^2) tests[14] to determine statistical significance. Chi-square tests compare the number of observed and expected applicants who were hired or passed a phase between racial/ethnic groups. If a chi-square test produces a p-value of less than .05, the result is evidence of adverse impact. Both the 4/5 standard and statistical significance should be used to evaluate the extent to which differences between groups are meaningful.

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[14] Chi-square tests are used in all instances except where sample sizes are small. In instances where expected cell values are less than 5, Fisher's Exact Test (FET; Fisher, 1922) is used. Fisher's Exact Test does not produce a test statistic, but like the Chi-square test, produces a p-value.

As the *Guidelines* explain, "Adverse impact is determined first for the overall selection process for each job. If the overall selection process has an adverse impact, the adverse impact of the individual selection procedure should be analyzed" (EEOC, 1980). Accordingly, for the present analyses, we first examine whether statistics indicate adverse impact for the total selection process; if either statistic indicates adverse impact, we then calculate adverse impact statistics for each phase.

Statistics alone do not indicate the need to modify hiring practices. Where statistical evidence indicates adverse impact, validity evidence is typically used to justify the use of a selection procedures (EEOC, 1980). Use of a selection procedure that produces adverse impact may be justified if job-relatedness is established. Thus, the results in this section may be considered a starting point for examining processes and procedures at phases where adverse impact is indicated.

As previously noted, the number of Undefined applicants rose drastically from FY2014 to FY2015, a shift that coincided with an OPM change in the demographic collection process from opt-in to opt-out. It is worthwhile to keep this in mind when examining results prior to and after this change.

Adverse impact results are presented in a similar order to the results previously presented in this report. First, we present overall results, both across the entire analysis timespan (i.e., 2011-2017), and also splitting results based on the years of data used in the two applicant flow reports (i.e., 2011-2014 and 2015-2017). Second, we examine individual occupational categories. Third, we examine results excluding applicants who self-selected out of the process and canceled openings. Lastly, we examine results adding in the Referred phase between the Best Qualified and Selected phases.

4.1 Overall Results

(b)(5)

(b)(5)

TABLE 3:   RESULTS INTERPRETATION KEY

(b)(5)

TABLE 4:   OVERALL 2011-2017 RESULTS BY RACE/ETHNICITY

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Asian	18,961	14,117	5,748	234	1.05	0.48	(b)(5)			
Black	76,569	55,839	17,902	380	0.42	0.00				
Hispanic	18,957	13,693	5,068	135	0.61	0.00				
D-U	56,177	39,837	15,646	396	0.60	0.00				
White	83,654	61,378	25,126	981	-	-				

TABLE 5:   OVERALL 2011-2014 RESULTS BY RACE/ETHNICITY

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Asian	12,514	9,305	3,762	153	1.06	0.48	(b)(5)			
Black	54,219	39,813	12,633	268	0.43	0.00				
Hispanic	11,712	8,477	3,037	88	0.65	0.00				
D-U	14,971	10,712	4,083	109	0.63	0.00				
White	63,388	46,137	18,358	728	-	-				

TABLE 6: OVERALL 2015-2017 RESULTS BY RACE/ETHNICITY

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Asian	6,447	4,812	1,986	81	1.01	0.96	(b)(5)			
Black	22,350	16,026	5,269	112	0.40	0.00				
Hispanic	7,245	5,216	2,031	47	0.52	0.00				
O-U	41,206	29,125	11,563	287	0.56	0.00				
White	20,266	15,241	6,768	253	-	-				

(b)(5)

(b)(5)

4.2 Results by Occupation

(b)(5)

(b)(5)

TABLE 7: RESULTS FOR ASIAN CANDIDATES BY OCCUPATION

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Misc. Admin. & Program Series	5,111	3,836	1,038	52	1.10	0.53	(b)(5)			
Other Jobs	4,438	3,221	1,541	79	1.43	0.01				
Examiners	2,911	1,842	816	43	0.87	0.39				
Administrative Assistants	1,014	782	137	8	1.41	0.40				
IT	2,772	2,274	1,302	25	0.43	0.00				
CFP Analysts	1,408	1,053	312	17	1.40	0.21				
Paralegals	773	721	401	5	2.14	0.18				
Economists	534	388	201	5	0.81	0.67				

TABLE 8: RESULTS FOR BLACK CANDIDATES BY OCCUPATION

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Misc. Admin. & Program Series	25,356	18,584	5,124	116	0.49	0.00	(b)(5)			
Other Jobs	20,996	15,454	5,416	81	0.31	0.00				
Examiners	9,806	5,742	2,105	89	0.53	0.00				
Administrative Assistants	8,624	6,885	1,294	47	0.97	0.91				
IT	3,634	2,915	1,937	18	0.24	0.00				
CFP Analysts	4,461	3,195	982	21	0.55	0.02				
Paralegals	3,066	2,677	899	6	0.65	0.38				

Economists	626	387	145	2	0.28	0.06	(b)(5)

TABLE 9: RESULTS FOR HISPANIC CANDIDATES BY OCCUPATION

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Misc. Admin. & Program Series	5,893	4,213	1,297	30	0.55	0.00	(b)(5)			
Other Jobs	4,588	3,349	1,350	28	0.49	0.00				
Examiners	3,169	1,968	789	39	0.72	0.06				
Administrative Assistants	1,577	1,186	219	8	0.91	0.81				
IT	1,274	1,030	676	9	0.34	0.00				
CFP Analysts	1,346	982	310	14	1.21	0.52				
Paralegals	866	790	333	2	0.76	0.00				
Economists	244	175	94	5	1.77	0.22				

TABLE 10: RESULTS FOR OTHER OR UNDEFINED CANDIDATES BY OCCUPATION

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Misc. Admin. & Program Series	19,446	13,694	4,648	121	0.67	0.00	(b)(5)			
Other Jobs	15,629	10,884	4,867	104	0.53	0.00				
Examiners	6,878	4,404	1,677	86	0.74	0.01				
Administrative Assistants	3,644	2,786	596	17	0.83	0.56				
IT	5,312	4,083	2,336	41	0.37	0.00				

CFP Analysts	2,626	1,839	557	17	0.75	0.30
Paralegals	1,833	1,602	536	5	0.90	0.84
Economists	809	545	429	5	0.53	0.20

(b)(5)

4.3 Results Excluding Self-Selection and Canceled Openings

(b)(5)
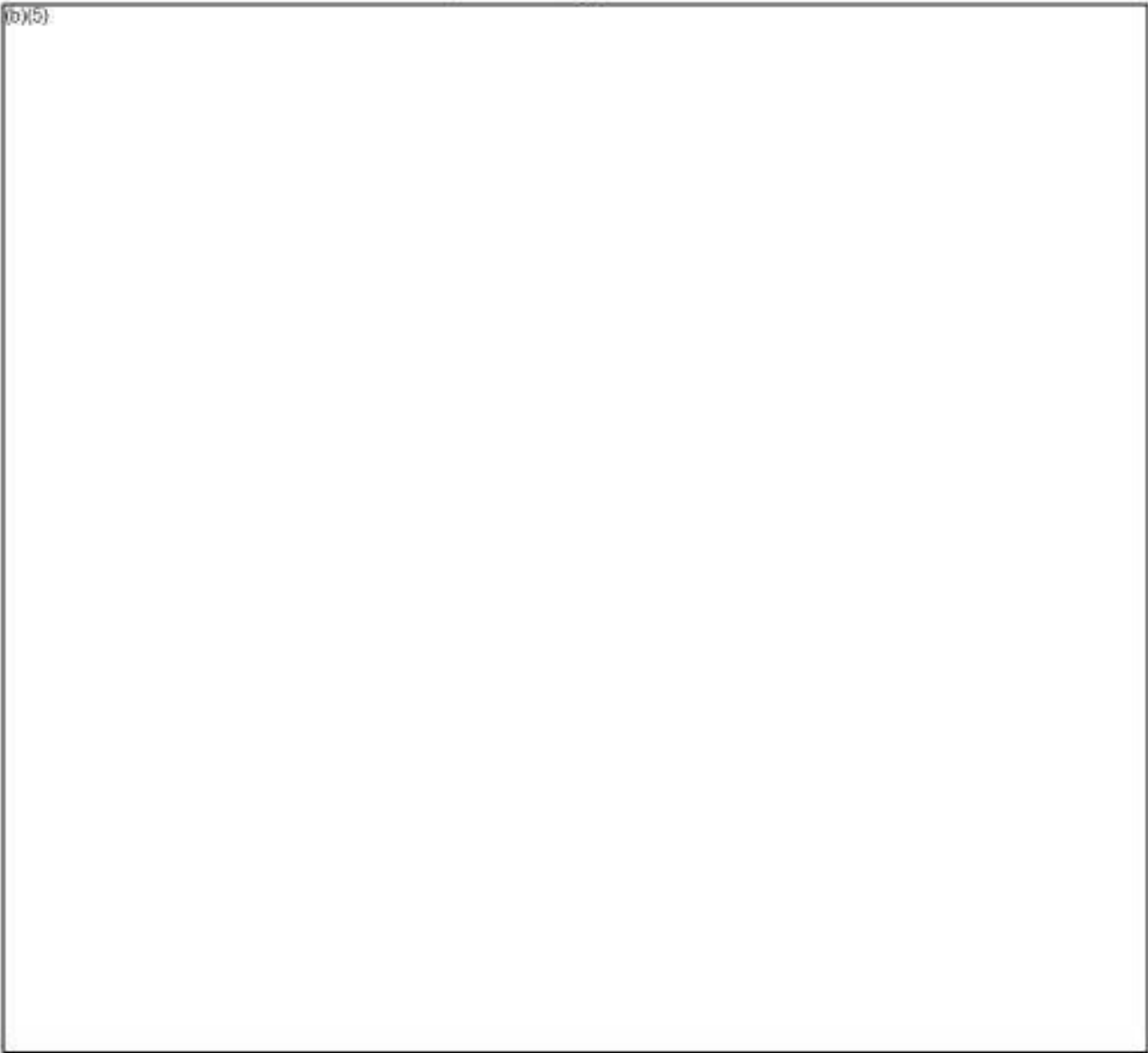
TABLE 11: OVERALL RESULTS EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Asian	9,215	3,455	2,983	120	1.11	0.31	(b)(5)			
Black	36,124	30,546	8,981	171	0.40	0.00				
Hispanic	9,547	7,942	2,852	64	0.57	0.00				
O-U	39,917	32,959	12,779	314	0.67	0.00				
White	34,721	29,422	11,544	407	-	-				

TABLE 12: RESULTS BY OCCUPATION FOR ASIAN CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Misc. Admin. & Program Series	2,577	2,157	577	22	1.04	0.85	(b)(5)			
Other Jobs	2,264	1,957	972	54	1.78	0.00				
Examiners	1,143	998	331	21	0.98	0.94				
Administrative Assistants	489	424	59	3	6.37	0.05				
IT	1,965	1,710	824	13	0.38	0.00				
CFP Analysts	470	379	65	4	1.12	0.77				
Paralegals	127	114	29	1	2.38	0.44				
Economists	180	159	126	2	0.70	1.00				

TABLE 13: RESULTS BY OCCUPATION FOR BLACK CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Misc. Admin. & Program Series	11,018	8,956	2,577	39	0.43	0.00	(b)(5)			
Other Jobs	10,510	9,046	2,749	53	0.38	0.00				
Examiners	4,322	3,705	1,163	43	0.53	0.00				
Administrative Assistants	5,298	4,695	823	19	3.72	0.06				
IT	2,330	1,994	1,163	10	0.25	0.00				
CFP Analysts	1,628	1,263	204	3	0.24	0.01				
Paralegals	863	752	196	3	1.05	1.00				
Economists	155	135	106	1	0.40	0.70				

TABLE 14: RESULTS BY OCCUPATION FOR HISPANIC CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	(b)(5)
Misc. Admin. & Program Series	2,898	2,288	759	12	0.51	0.02	
Other Jobs	2,581	2,191	869	15	0.43	0.00	
Examiners	1,413	1,225	427	16	0.61	0.06	
Administrative Assistants	892	742	139	2	2.33	0.59	
IT	939	814	484	7	0.43	0.03	
CFP Analysts	501	384	67	7	1.84	0.18	
Paralegals	228	211	35	2	2.65	0.00	
Economists	95	87	72	3	1.98	0.40	

TABLE 15: RESULTS BY OCCUPATION FOR OTHER OR UNDEFINED CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

	Applied	Eligible	BQ	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Selected
Misc. Admin. & Program Series	14,238	11,250	3,958	89	0.76	0.07	(b)(5)			
Other Jobs	11,186	9,351	4,145	88	0.59	0.00				
Examiners	4,165	3,586	1,237	73	0.94	0.67				
Administrative Assistants	2,794	2,394	492	13	4.83	0.02				
IT	4,356	3,747	2,048	34	0.45	0.00				
CFP Analysts	1,629	1,227	296	9	0.73	0.44				
Paralegals	1,066	979	212	4	1.14	1.00				
Economists	483	425	391	4	0.52	0.26				

(b)(5)

[blank boxed region]
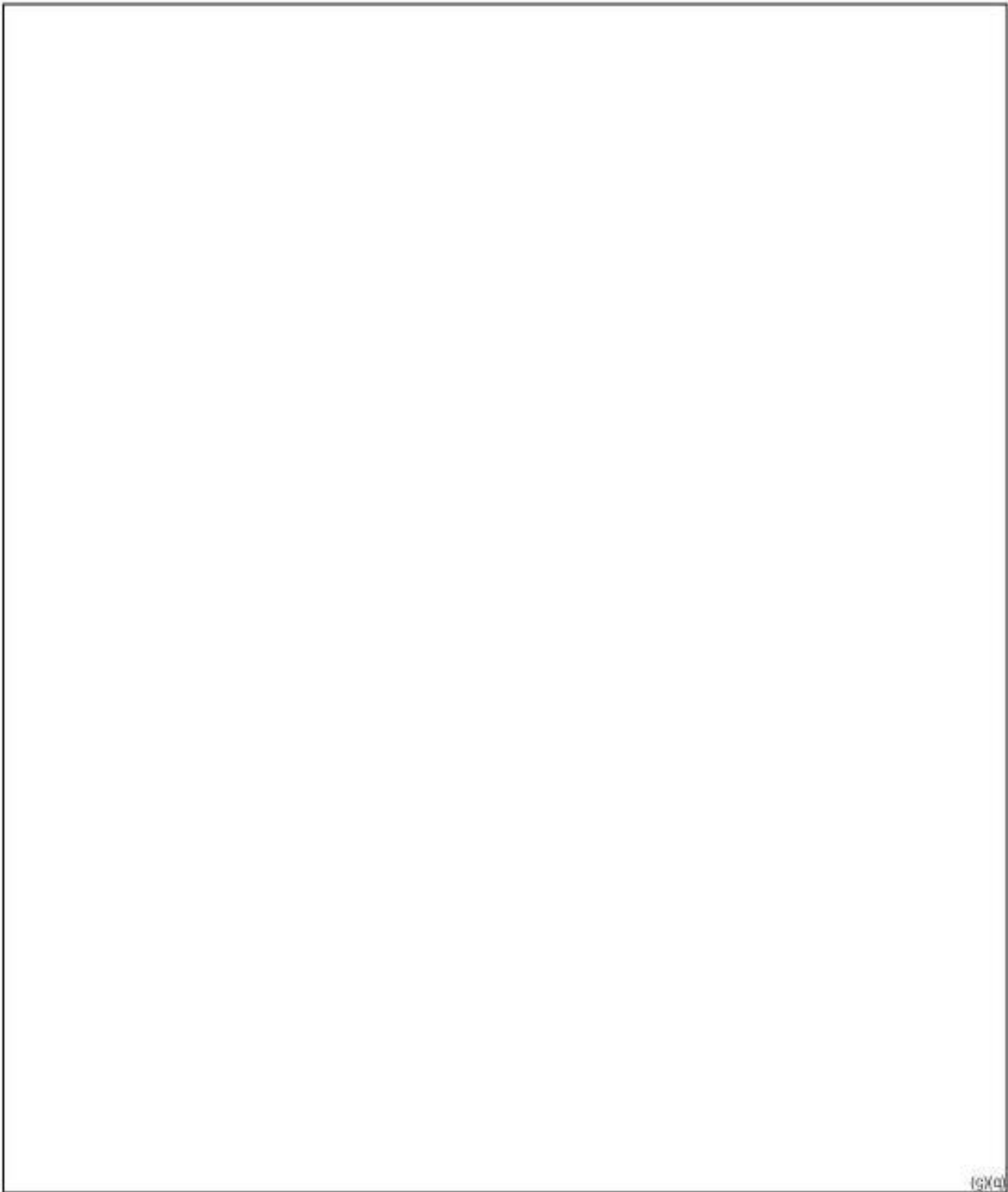
4.4 Results Including Referred Phase

In the analyses that follow, the Referred phase is added between the Best Qualified and Selected phases. Tables 16-20 present results including this phase. Because previous result summaries have explored the total selection process, Applied-Eligible, Eligible-BQ, and BQ-Selected phases in several ways, the present results summary is focused on the BQ-Referred and Referred-Selected phases. The available data allowed us to examine these results from FY2014 – FY2017. Tables 38-42 in the Adverse Impact Results Tables appendix present AIRs, Chi-square values (or an indicator that Fisher's Exact Test was used), and p-values for the total selection process and each phase.

TABLE 16: OVERALL RESULTS INCLUDING THE REFERRED PHASE

	Applied	Eligible	BQ	Referred	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Referred	Referred - Selected
Asian	10,556	7,898	2,983	637	120	1.11	0.31	(b)(5)				
Black	41,955	30,546	8,981	2,952	171	0.40	0.00					
Hispanic	11,109	7,942	2,852	963	64	0.56	0.00					
O-U	46,453	32,959	12,779	5,785	314	0.66	0.00					
White	39,801	29,422	11,544	2,910	407	-	-					

TABLE 17: RESULTS BY OCCUPATION FOR ASIAN CANDIDATES, INCLUDING THE REFERRED PHASE

	Applied	Eligible	BQ	Referred	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Referred	Referred - Selected
Misc. Admin. & Program Series	2,889	2,157	577	199	22	1.03	0.90	(b)(5)				
Other Jobs	2,594	1,957	972	178	54	1.74	0.00					
Examiners	1,491	998	331	131	21	1.00	0.99					
Administrative Assistants	583	424	59	16	3	6.64	0.05					
IT	2,137	1,710	824	63	13	0.38	0.00					
CFP Analysts	510	379	65	29	4	1.10	0.78					
Paralegals	136	114	29	15	1	2.34	0.44					
Economists	216	159	126	6	2	0.68	1.00					

TABLE 18: RESULTS BY OCCUPATION FOR BLACK CANDIDATES, INCLUDING THE REFERRED PHASE

	Applied	Eligible	BQ	Referred	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Referred	Referred - Selected
Misc. Admin. & Program Series	12,475	8,956	2,577	997	39	0.42	0.00	(b)(5)				
Other Jobs	12,037	9,046	2,749	953	53	0.37	0.00					
Examiners	5,878	3,705	1,163	500	43	0.52	0.00					
Administrative Assistants	6,108	4,695	823	297	19	4.01	0.04					
IT	2,555	1,994	1,163	41	10	0.24	0.00					
CFP Analysts	1,760	1,263	204	63	3	0.24	0.01					
Paralegals	930	752	196	97	3	1.03	1.00					
Economists	212	135	106	4	1	0.35	0.47					

TABLE 19: RESULTS BY OCCUPATION FOR HISPANIC CANDIDATES, INCLUDING THE REFERRED PHASE

	Applied	Eligible	BQ	Referred	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Referred	Referred - Selected
Misc. Admin. & Program Series	3,284	2,288	759	334	12	0.49	0.02	(b)(5)				
Other Jobs	2,958	2,191	869	288	15	0.42	0.00					
Examiners	1,859	1,225	427	213	16	0.61	0.07					
Administrative Assistants	1,088	742	139	50	2	2.37	0.59					
IT	1,028	814	484	25	7	0.42	0.02					
CFP Analysts	533	384	67	24	7	1.83	0.00					
Paralegals	241	211	35	23	2	2.64	0.30					
Economists	118	87	72	6	3	1.86	0.00					

TABLE 20: RESULTS BY OCCUPATION FOR OTHER OR UNDEFINED CANDIDATES, INCLUDING THE REFERRED PHASE

	Applied	Eligible	BQ	Referred	Selected	Total Process AIR	Total Process p-value	Applied - Selected	Applied - Eligible	Eligible - BQ	BQ - Referred	Referred - Selected
Misc. Admin. & Program Series	16,093	11,250	3,958	2,190	89	0.75	0.05	(b)(5)				
Other Jobs	13,354	9,351	4,145	1,938	88	0.55	0.00					
Examiners	5,358	3,586	1,237	825	73	0.97	0.85					
Administrative Assistants	3,174	2,394	492	330	13	5.28	0.01					
IT	4,909	3,747	2,048	200	34	0.43	0.00					
CFP Analysts	1,786	1,227	296	161	9	0.70	0.39					
Paralegals	1,158	979	212	129	4	1.10	1.00					
Economists	621	425	391	12	4	0.47	0.19					

5. Summary and Conclusions

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[15] The one exception was FY 2017 where White applicants were more likely to be selected than Asian applicants

(b)(5)

REFERENCES

Equal Employment Opportunity Commission, Civil Service Commission, Department of Labor, and Department of Justice (1978). Uniform guidelines on employee selection procedures. *Federal Register, 43*, 38290-38315.

Equal Employment Opportunity Commission, Department of Labor, Department of Justice, and Office of Personnel Management (1980). Uniform guidelines interpretation and clarification. *Federal Register, 69*, 10152-10158.

Fisher, R.A. (1922). On the interpretation of χ^2 from contingency tables, and the calculation of P. *Journal of the Royal Statistical Society, 85*, 87-94.

DATA TABLES

TABLE 21: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY RACE/ETHNICITY AND HIRING PHASE, FY2011 – FY2017

All Applicants	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.3%	2.2%	2.2%	1.0%	5639	4017	1532	22
Asian	7.5%	7.6%	8.3%	11.0%	18961	14117	5748	234
Hispanic/Latino	7.5%	7.4%	7.3%	6.3%	18957	13693	5068	135
Black/African American	30.1%	30.2%	25.8%	17.9%	76569	55839	17902	380
White	32.9%	33.2%	36.2%	46.1%	83654	61378	25126	981
Undefined	19.9%	19.4%	20.3%	17.6%	50538	35820	14114	374
Total	100.0%	100.0%	100.0%	100.0%	254318	184864	69490	2126

Misc. Admin. & Program Series	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.3%	2.4%	1.1%	1827	1347	433	6
Asian	6.3%	6.4%	5.8%	9.3%	5111	3836	1038	52
Hispanic/Latino	7.2%	7.0%	7.3%	5.4%	5893	4213	1297	30
Black/African American	31.0%	31.0%	28.7%	20.8%	25356	18584	5124	116
White	31.7%	32.6%	32.2%	42.9%	25938	19528	5752	240
Undefined	21.6%	20.6%	23.6%	20.6%	17619	12347	4215	115
Total	100.0%	100.0%	100.0%	100.0%	81744	59855	17859	559

Other Jobs	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.1%	2.1%	0.7%	1454	1013	409	4
Asian	6.8%	6.8%	7.8%	14.7%	4438	3221	1541	79
Hispanic/Latino	7.0%	7.0%	6.8%	5.2%	4588	3349	1350	28
Black/African American	32.1%	32.4%	27.3%	15.1%	20996	15454	5416	81
White	30.2%	31.0%	33.7%	45.7%	19735	14753	6693	246
Undefined	21.7%	20.7%	22.4%	18.6%	14175	9871	4458	100
Total	100.0%	100.0%	100.0%	100.0%	65386	47661	19867	538

Examiners	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.1%	2.3%	1.3%	852	495	222	7
Asian	7.6%	7.9%	8.3%	8.2%	2911	1842	816	43
Hispanic/Latino	8.2%	8.4%	8.0%	7.4%	3169	1968	789	39
Black/African American	25.4%	24.6%	21.5%	17.0%	9806	5742	2105	89

White	40.9%	40.2%	45.1%	51.0%	15769	9374	4417	268
Undefined	15.6%	16.8%	14.8%	15.0%	6026	3909	1455	79
Total	100.0%	100.0%	100.0%	100.0%	38533	23330	9804	525

Administrative Assistants	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.5%	2.5%	2.3%	2.9%	474	371	70	3
Asian	5.3%	5.3%	4.6%	7.7%	1014	782	137	8
Hispanic/Latino	8.2%	8.0%	7.3%	7.7%	1577	1186	219	8
Black/African American	45.1%	46.3%	43.2%	45.2%	8624	6885	1294	47
White	22.4%	21.8%	25.1%	23.1%	4282	3242	751	24
Undefined	16.6%	16.2%	17.6%	13.5%	3170	2415	526	14
Total	100.0%	100.0%	100.0%	100.0%	19141	14881	2997	104

IT	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.3%	2.2%	2.3%	0.0%	417	322	216	0
Asian	15.1%	15.4%	14.1%	12.2%	2772	2274	1302	25
Hispanic/Latino	6.9%	7.0%	7.3%	4.4%	1274	1030	676	9
Black/African American	19.8%	19.8%	21.0%	8.8%	3634	2915	1937	18
White	29.3%	30.1%	32.3%	54.6%	5385	4432	2981	112
Undefined	26.6%	25.5%	23.0%	20.0%	4895	3761	2120	41
Total	100.0%	100.0%	100.0%	100.0%	18377	14734	9232	205

CFP Analysts	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.1%	2.2%	0.8%	360	250	87	1
Asian	8.4%	8.7%	7.9%	13.3%	1408	1053	312	17
Hispanic/Latino	8.1%	8.1%	7.9%	10.9%	1346	982	310	14
Black/African American	26.7%	26.3%	25.0%	16.4%	4461	3195	982	21
White	41.1%	41.8%	45.1%	46.1%	6853	5073	1772	59
Undefined	13.6%	13.1%	12.0%	12.5%	2266	1589	470	16
Total	100.0%	100.0%	100.0%	100.0%	16694	12142	3933	128

Paralegals	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	1.9%	1.8%	1.7%	3.3%	198	174	73	1
Asian	7.4%	7.6%	9.5%	16.7%	773	721	401	5
Hispanic/Latino	8.2%	8.3%	7.9%	6.7%	866	790	333	2
Black/African American	29.2%	28.2%	21.3%	20.0%	3066	2677	899	6
White	37.7%	38.9%	48.6%	40.0%	3964	3688	2047	12
Undefined	15.6%	15.1%	11.0%	13.3%	1635	1428	463	4
Total	100.0%	100.0%	100.0%	100.0%	10502	9478	4216	30

Economists	Percentage by Hiring Phase				Applicant Count			

Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	1.4%	1.6%	1.4%	0.0%	57	45	22	0
Asian	13.5%	13.9%	12.7%	13.5%	534	388	201	5
Hispanic/Latino	6.2%	6.3%	5.9%	13.5%	244	175	94	5
Black/African American	15.9%	13.9%	9.2%	5.4%	626	387	145	2
White	43.8%	46.3%	45.1%	54.1%	1728	1288	713	20
Undefined	19.1%	18.0%	25.7%	13.5%	752	500	407	5
Total	100.0%	100.0%	100.0%	100.0%	3941	2783	1582	37

| FY2011-FY2012 | Percentage by Hiring Phase | | | | Applicant Count | | | |
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.1%	2.1%	0.7%	1398	968	387	4
Asian	7.4%	7.5%	8.5%	10.8%	4707	3455	1581	65
Hispanic/Latino	7.3%	7.3%	7.1%	5.8%	4588	3357	1313	35
Black/African American	33.0%	33.1%	28.4%	21.6%	20833	15200	5265	130
White	43.3%	43.3%	46.6%	53.7%	27341	19899	8660	324
Undefined	6.9%	6.8%	7.3%	7.5%	4339	3110	1361	45
Total	100.0%	100.0%	100.0%	100.0%	63206	45989	18567	603

| FY2013 | Percentage by Hiring Phase | | | | Applicant Count | | | |
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.3%	2.2%	2.4%	1.6%	938	675	280	7
Asian	9.0%	9.2%	10.0%	11.0%	3698	2764	1184	49
Hispanic/Latino	7.9%	8.0%	7.7%	8.1%	3260	2394	903	36
Black/African American	33.4%	33.5%	31.0%	17.7%	13781	10093	3656	79
White	40.0%	40.0%	41.8%	55.9%	16512	12057	4922	250
Undefined	7.4%	7.1%	7.1%	5.8%	3049	2125	839	26
Total	100.0%	100.0%	100.0%	100.0%	41238	30108	11784	447

| FY2014 | Percentage by Hiring Phase | | | | Applicant Count | | | |
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.5%	2.6%	2.6%	1.0%	1321	992	295	3
Asian	7.8%	8.0%	8.7%	13.2%	4109	3086	997	39
Hispanic/Latino	7.4%	7.1%	7.1%	5.7%	3864	2726	821	17
Black/African American	37.4%	37.9%	32.2%	19.9%	19605	14520	3712	59
White	37.3%	37.0%	41.5%	52.0%	19535	14181	4776	154
Undefined	7.5%	7.4%	8.0%	8.1%	3926	2842	921	24
Total	100.0%	100.0%	100.0%	100.0%	52360	38347	11522	296

| FY2015 | Percentage by Hiring Phase | | | | Applicant Count | | | |
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	1.8%	1.7%	1.7%	0.5%	706	476	175	1
Asian	5.0%	5.1%	5.1%	7.8%	1944	1418	524	17
Hispanic/Latino	7.0%	7.0%	7.0%	3.7%	2738	1969	709	8
Black/African American	20.2%	20.2%	17.3%	9.2%	7849	5653	1762	20
White	16.7%	17.1%	19.7%	25.2%	6479	4782	2001	55
Undefined	49.3%	48.9%	49.2%	53.7%	19192	13668	5010	117
Total	100.0%	100.0%	100.0%	100.0%	38908	27966	10181	218

| FY2016 | Percentage by Hiring Phase | | | | Applicant Count | | | |
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected

	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.1%	2.1%	2.3%	0.8%	855	589	255	3
Asian	7.0%	7.2%	7.6%	11.9%	2801	2011	834	42
Hispanic/Latino	7.2%	7.0%	6.9%	7.3%	2872	1958	754	26
Black/African American	24.4%	24.0%	19.8%	16.7%	9763	6678	2173	59
White	22.2%	23.1%	25.2%	29.4%	8900	6417	2772	104
Undefined	37.1%	36.5%	38.3%	33.9%	14831	10138	4212	120
Total	100.0%	100.0%	100.0%	100.0%	40022	27791	11000	354

FY2017	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.3%	2.2%	2.2%	1.9%	421	317	140	4
Asian	9.2%	9.4%	9.8%	10.6%	1702	1383	628	22
Hispanic/Latino	8.8%	8.8%	8.8%	6.3%	1635	1289	568	13
Black/African American	25.5%	25.2%	20.7%	15.9%	4738	3695	1334	33
White	26.3%	27.6%	31.0%	45.2%	4887	4042	1995	94
Undefined	28.0%	26.8%	27.5%	20.2%	5201	3937	1771	42
Total	100.0%	100.0%	100.0%	100.0%	18584	14663	6436	208

TABLE 22: DATA TABLES: APPLICANTS FOR NON-EXECUTIVE POSITIONS BY RACE/ETHNICITY AND HIRING PHASE, EXCLUDING THOSE WHO SELF-SELECTED OUT AND CANCELED OPENINGS, FY2014 – FY2017

All Applicants	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.2%	2.2%	1.0%	2879	2374	865	11
Asian	7.1%	7.3%	7.6%	11.2%	9215	7898	2983	120
Hispanic/Latino	7.4%	7.3%	7.3%	5.9%	9547	7942	2852	64
Black/African American	27.9%	28.1%	22.9%	15.9%	36124	30546	8981	171
White	26.8%	27.1%	29.5%	37.8%	34721	29422	11544	407
Undefined	28.6%	28.1%	30.4%	28.2%	37038	30585	11914	303
Total	100.0%	100.0%	100.0%	100.0%	129524	108767	39139	1076

Misc. Admin. & Program Series	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.2%	2.2%	2.3%	0.4%	926	739	253	1
Asian	6.2%	6.4%	5.3%	8.8%	2577	2157	577	22
Hispanic/Latino	7.0%	6.8%	7.0%	4.8%	2898	2288	759	12
Black/African American	26.5%	26.6%	23.8%	15.5%	11018	8956	2577	39
White	26.2%	26.7%	27.3%	35.5%	10887	8994	2960	89
Undefined	32.0%	31.2%	34.2%	35.1%	13312	10511	3705	88
Total	100.0%	100.0%	100.0%	100.0%	41618	33645	10831	251

Other Jobs	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.1%	2.0%	1.8%	0.3%	755	621	225	1
Asian	6.3%	6.4%	7.8%	16.0%	2264	1957	972	54
Hispanic/Latino	7.2%	7.1%	7.0%	4.5%	2581	2191	869	15
Black/African American	29.2%	29.4%	22.0%	15.7%	10510	9046	2749	53
White	26.3%	26.7%	30.1%	37.7%	9492	8229	3753	127
Undefined	28.9%	28.4%	31.4%	25.8%	10431	8730	3920	87
Total	100.0%	100.0%	100.0%	100.0%	36033	30774	12488	337

Examiners	Percentage by Hiring Phase0				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.4%	2.4%	2.7%	2.0%	399	335	132	5
Asian	7.0%	7.1%	6.7%	8.3%	1143	998	331	21
Hispanic/Latino	8.7%	8.8%	8.7%	6.3%	1413	1225	427	16
Black/African American	26.5%	26.5%	23.6%	17.1%	4322	3705	1163	43
White	32.4%	31.9%	35.8%	39.3%	5292	4465	1764	99
Undefined	23.1%	23.3%	22.5%	27.0%	3766	3251	1105	68
Total	100.0%	100.0%	100.0%	100.0%	16335	13979	4922	252

Administrative Assistants	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.6%	2.6%	2.5%	7.7%	303	263	46	3
Asian	4.2%	4.2%	3.2%	7.7%	489	424	59	3
Hispanic/Latino	7.7%	7.4%	7.5%	5.1%	892	742	139	2
Black/African American	45.9%	46.9%	44.7%	48.7%	5298	4695	823	19
White	18.0%	17.6%	17.9%	5.1%	2075	1763	330	2
Undefined	21.6%	21.3%	24.2%	25.6%	2491	2131	446	10
Total	100.0%	100.0%	100.0%	100.0%	11548	10018	1843	39

IT	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.1%	2.2%	2.3%		280	244	148	0
Asian	15.0%	15.1%	13.0%	10.4%	1965	1710	824	13
Hispanic/Latino	7.2%	7.2%	7.6%	5.6%	939	814	484	7
Black/African American	17.8%	17.6%	18.4%	8.0%	2330	1994	1163	10
White	26.7%	27.1%	28.6%	48.8%	3502	3076	1811	61
Undefined	31.1%	30.9%	30.0%	27.2%	4076	3503	1900	34
Total	100.0%	100.0%	100.0%	100.0%	13092	11341	6330	125

CFP Analysts	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	2.1%	2.0%	2.8%	2.5%	136	102	27	1
Asian	7.3%	7.5%	6.7%	10.0%	470	379	65	4
Hispanic/Latino	7.7%	7.6%	6.9%	17.5%	501	384	67	7
Black/African American	25.2%	25.1%	21.1%	7.5%	1628	1263	204	3
White	34.6%	35.3%	34.6%	42.5%	2241	1778	335	17
Undefined	23.1%	22.4%	27.8%	20.0%	1493	1125	269	8
Total	100.0%	100.0%	100.0%	100.0%	6469	5031	967	40

Paralegals	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	1.9%	1.9%	2.8%		56	48	16	0
Asian	4.4%	4.4%	5.1%	8.3%	127	114	29	1
Hispanic/Latino	7.9%	8.1%	6.1%	16.7%	228	211	35	2
Black/African American	29.9%	29.0%	34.1%	25.0%	863	752	196	3
White	20.9%	20.6%	17.8%	16.7%	605	535	102	2
Undefined	35.0%	35.9%	34.1%	33.3%	1010	931	196	4
Total	100.0%	100.0%	100.0%	100.0%	2889	2591	574	12

Economists	Percentage by Hiring Phase				Applicant Count			

Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Other	1.6%	1.6%	1.5%		24	22	18	0
Asian	11.7%	11.5%	10.6%	10.0%	180	159	126	2
Hispanic/Latino	6.2%	6.3%	6.1%	15.0%	95	87	72	3
Black/African American	10.1%	9.7%	9.0%	5.0%	155	135	106	1
White	40.7%	41.9%	41.3%	50.0%	627	582	489	10
Undefined	29.8%	29.0%	31.5%	20.0%	459	403	373	4
Total	100.0%	100.0%	100.0%	100.0%	1540	1388	1184	20

TABLE 23: DATA TABLES: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY RACE/ETHNICITY AND 5 HIRING PHASES, FY 2014 – 2017

All Applicants Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	2.2%	2.2%	2.2%	2.2%	1.0%	3303	2374	865	287	11
Asian	7.0%	7.3%	7.6%	4.8%	11.2%	10556	7898	2983	637	120
Hispanic/Latino	7.6%	7.3%	7.3%	7.3%	5.9%	11109	7942	2852	963	64
Black/Afr. American	28.0%	28.1%	22.9%	22.3%	15.9%	41955	30546	8981	2952	171
White	26.6%	27.1%	29.5%	22.0%	37.8%	39801	29422	11544	2910	407
Undefined	28.8%	28.1%	30.4%	41.5%	28.2%	43150	30585	11914	5498	303
Total	100%	100%	100%	100%	100%	149874	108767	39139	13247	1076
Misc. Admin. & Program Series Ethnicity	**Percentage by Hiring Phase**					**Applicant Count**				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	2.2%	2.2%	2.3%	2.2%	0.4%	1022	739	253	103	1
Asian	6.2%	6.4%	5.3%	4.2%	8.8%	2889	2157	577	199	22
Hispanic/Latino	7.0%	6.8%	7.0%	7.1%	4.8%	3284	2288	759	334	12
Black/Afr. American	26.7%	26.6%	23.8%	21.1%	15.5%	12475	8956	2577	997	39
White	25.7%	26.7%	27.3%	21.3%	35.5%	12030	8994	2960	1005	89
Undefined	32.2%	31.2%	34.2%	44.2%	35.1%	15071	10511	3705	2087	88
Total	100%	100%	100%	100%	100%	46771	33645	10831	4725	251
Other Jobs Ethnicity	**Percentage by Hiring Phase**					**Applicant Count**				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	2.1%	2.0%	1.8%	1.6%	0.3%	870	621	225	68	1
Asian	6.2%	6.4%	7.8%	4.2%	16.0%	2594	1957	972	178	54
Hispanic/Latino	7.1%	7.1%	7.0%	6.8%	4.5%	2958	2191	869	288	15
Black/Afr. American	29.0%	29.4%	22.0%	22.6%	15.7%	12037	9046	2749	953	53
White	25.5%	26.7%	30.1%	20.5%	37.7%	10610	8229	3753	865	127

	Percentage by Hiring Phase					Applicant Count				
Undefined	30.0%	28.4%	31.4%	44.3%	25.8%	12484	8730	3920	1870	87
Total	100%	100%	100%	100%	100%	41553	30774	12488	4222	337

Examiners	Percentage by Hiring Phase					Applicant Count				
Ethnicity	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	2.4%	2.4%	2.7%	3.0%	2.0%	524	335	132	70	5
Asian	6.9%	7.1%	6.7%	5.6%	8.3%	1491	998	331	131	21
Hispanic/Latino	8.6%	8.8%	8.7%	9.1%	6.3%	1859	1225	427	213	16
Black/Afr. American	27.2%	26.5%	23.6%	21.4%	17.1%	5878	3705	1163	500	43
White	32.6%	31.9%	35.8%	28.6%	39.3%	7057	4465	1764	670	99
Undefined	22.3%	23.3%	22.5%	32.3%	27.0%	4834	3251	1105	755	68
Total	100%	100%	100%	100%	100%	21643	13979	4922	2339	252

Administrative Assistants	Percentage by Hiring Phase					Applicant Count				
Ethnicity	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	2.5%	2.6%	2.5%	2.9%	7.7%	343	263	46	23	3
Asian	4.3%	4.2%	3.2%	2.0%	7.7%	583	424	59	16	3
Hispanic/Latino	8.0%	7.4%	7.5%	6.4%	5.1%	1088	742	139	50	2
Black/Afr. American	45.1%	46.9%	44.7%	37.8%	48.7%	6108	4695	823	297	19
White	19.1%	17.6%	17.9%	11.7%	5.1%	2579	1763	330	92	2
Undefined	20.9%	21.3%	24.2%	39.1%	25.6%	2831	2131	446	307	10
Total	100%	100%	100%	100%	100%	13532	10018	1843	785	39

IT Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	2.2%	2.2%	2.3%	1.1%		314	244	148	5	0
Asian	14.8%	15.1%	13.0%	13.9%	10.4%	2137	1710	824	63	13
Hispanic/Latino	7.1%	7.2%	7.6%	5.5%	5.6%	1028	814	484	25	7
Black/Afr. American	17.7%	17.6%	18.4%	9.0%	8.0%	2555	1994	1163	41	10
White	26.2%	27.1%	28.6%	27.5%	48.8%	3781	3076	1811	125	61
Undefined	31.9%	30.9%	30.0%	43.0%	27.2%	4595	3503	1900	195	34
Total	100%	100%	100%	100%	100%	14410	11341	6330	454	125

CFP Analysts Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	2.1%	2.0%	2.8%	1.9%	2.5%	145	102	27	7	1
Asian	7.3%	7.5%	6.7%	7.9%	10.0%	510	379	65	29	4
Hispanic/Latino	7.7%	7.6%	6.9%	6.5%	17.5%	533	384	67	24	7
Black/Afr. American	25.3%	25.1%	21.1%	17.2%	7.5%	1760	1263	204	63	3
White	34.1%	35.3%	34.6%	24.5%	42.5%	2375	1778	335	90	17
Undefined	23.6%	22.4%	27.8%	42.0%	20.0%	1641	1125	269	154	8
Total	100%	100%	100%	100%	100%	6964	5031	967	367	40

Paralegals Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	1.9%	1.9%	2.8%	3.2%		59	48	16	10	0
Asian	4.4%	4.4%	5.1%	4.9%	8.3%	136	114	29	15	1
Hispanic/Latino	7.8%	8.1%	6.1%	7.4%	16.7%	241	211	35	23	2
Black/Afr. American	30.0%	29.0%	34.1%	31.4%	25.0%	930	752	196	97	3
White	20.5%	20.6%	17.8%	14.6%	16.7%	636	535	102	45	2
Undefined	35.4%	35.9%	34.1%	38.5%	33.3%	1099	931	196	119	4
Total	100%	100%	100%	100%	100%	3101	2591	574	309	12

Economists Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Other	1.4%	1.6%	1.5%	2.2%		26	22	18	1	0
Asian	11.4%	11.5%	10.6%	13.0%	10.0%	216	159	126	6	2
Hispanic/Latino	6.2%	6.3%	6.1%	13.0%	15.0%	118	87	72	6	3
Black/Afr. American	11.2%	9.7%	9.0%	8.7%	5.0%	212	135	106	4	1
White	38.6%	41.9%	41.3%	39.1%	50.0%	733	582	489	18	10
Undefined	31.3%	29.0%	31.5%	23.9%	20.0%	595	403	373	11	4

Total	100%	100%	100 %	100%	100%	1900	1388	1184	46	20

SYSTEM VALID APPLICANT CUSTOM STATUS CODES

Status Code	Status Description
BQ	Best Qualified
BQCP	Best Qualified - CP[16]
BQCS	Best Qualified - CPS
BQSP	Best Qualified - Sole Survivor
BQTP	Best Qualified - TP
BQXP	Best Qualified - XP
CAN	Announcement Cancelled
CATB	SME Review, Category B
CATC	SME Review, Category C
DA	Declined Agency
DG	Declined grade
DL	Declined location
DZ	Declined for other reasons
FR	Failed to Reply
INC	Not eligible - Incomplete application
INEL	Not eligible for consideration
INR	Incomplete - No resume
IOTH	Incomplete - Incomplete application
ISF5	Incomplete - No SF50
ITRA	Incomplete - No Transcript
NCBQ	Non-Competitive Best Qualified
NN	Not Selected-Not Contacted
NQEE	Not Qualified - Education/Experience
NQSE	Not Qualified - Specialized Experience
NQSS	Not Qualified-Self Screen-out
NRMP	Not Referred Merit Promotion
NRNA	Not Referred to Next Assessment
NRNR	Not Reviewed Not Referred
NS	Not Selected
REV	Reviewing Application
SEL	Applicant Selected

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[16] CP, CPS, TP and XP are formally defined status codes for different types of veterans' preference. The definition and meaning behind such codes can be found in Title V regulation.

Status Code	Status Description
SME	Subject Matter Expert Review
WITH	Withdrew Consideration

ADVERSE IMPACT RESULTS TABLES

TABLE 24: OVERALL 2011-2017 RESULTS BY RACE/ETHNICITY

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TABLE 25: OVERALL 2011-2014 RESULTS BY RACE/ETHNICITY

(b)(5)

TABLE 26:   OVERALL 2015-2017 RESULTS BY RACE/ETHNICITY

(b)(5)

TABLE 27:   RESULTS FOR ASIAN CANDIDATES BY OCCUPATION

(b)(5)

TABLE 28: RESULTS FOR BLACK CANDIDATES BY OCCUPATION
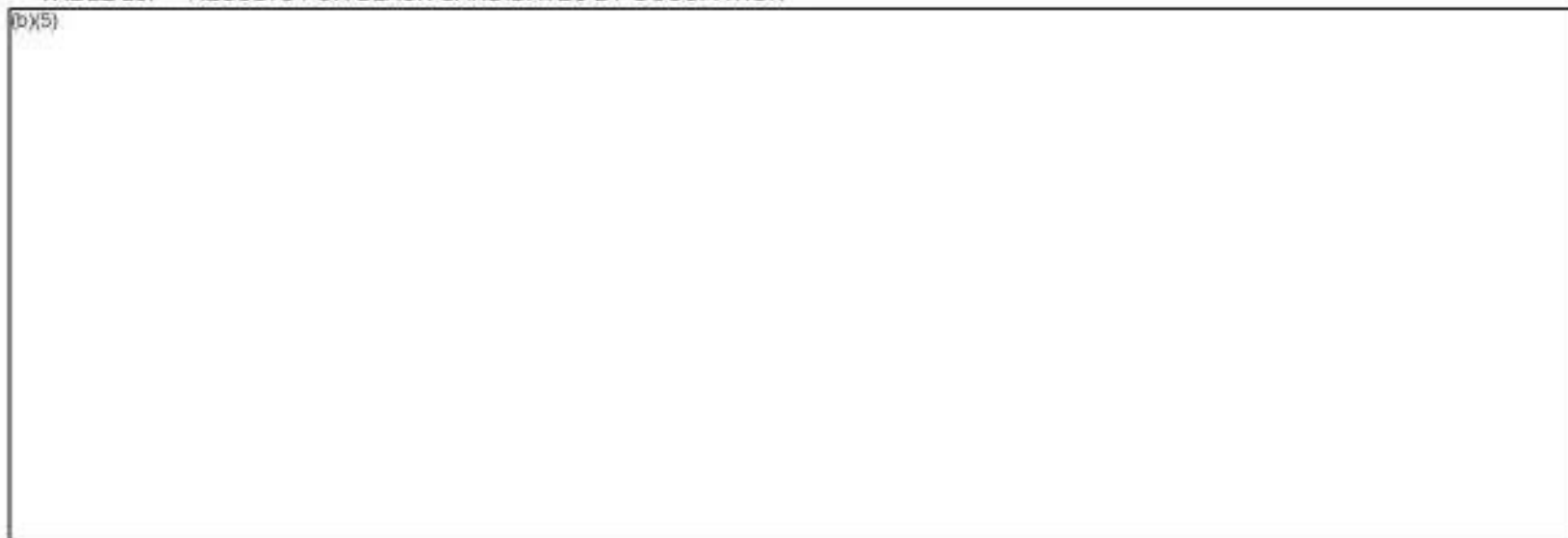
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TABLE 29: RESULTS FOR HISPANIC CANDIDATES BY OCCUPATION

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TABLE 30: RESULTS FOR OTHER OR UNDEFINED CANDIDATES BY OCCUPATION

(b)(5)

TABLE 31: OVERALL RESULTS EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

(b)(5)

TABLE 32: RESULTS BY OCCUPATION FOR ASIAN CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

(b)(5)

TABLE 33: RESULTS BY OCCUPATION FOR BLACK CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

(b)(5)

TABLE 34: RESULTS BY OCCUPATION FOR HISPANIC CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

(b)(5)

TABLE 35: RESULTS BY OCCUPATION FOR OTHER OR UNDEFINED CANDIDATES, EXCLUDING SELF-SELECTION AND CANCELED OPENINGS

(b)(5)

(b)(5)

TABLE 36: OVERALL RESULTS INCLUDING THE REFERRED PHASE

(b)(5)

TABLE 37: RESULTS BY OCCUPATION FOR ASIAN CANDIDATES, INCLUDING THE REFERRED PHASE

(b)(5)

TABLE 38: RESULTS BY OCCUPATION FOR BLACK CANDIDATES, INCLUDING THE REFERRED PHASE
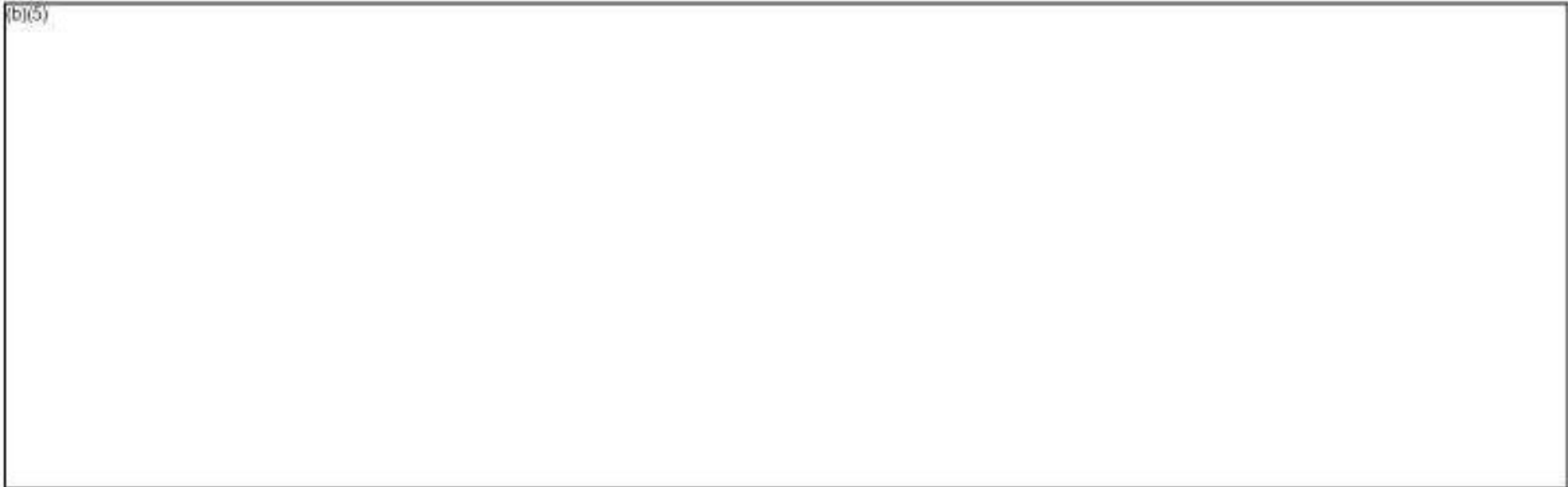
(b)(5)

TABLE 39: RESULTS BY OCCUPATION FOR HISPANIC CANDIDATES, INCLUDING THE REFERRED PHASE

(b)(5)

TABLE 40: RESULTS BY OCCUPATION FOR OTHER OR UNDEFINED CANDIDATES, INCLUDING THE REFERRED PHASE

Analyses of CFPB Hiring Data: FY2011 – FY2014

September 2015

PDRI, a CEB Company

1777 N Kent St, Suite 401

Arlington, VA 22209

voice: (703) 276-4680

fax: (703) 276-7567

e-mail: info@pdri.com

Table of Contents

1. CFPB Hiring Data Analyses: FY2011 – FY2014

1.1 Summary of Hiring Data Set

CFPB provided the PDRI team with hiring data for applicants from FY 2011 through part of FY 2015. These data were obtained through CFPB's talent acquisition system (Career Connector), which only contains data for applicants who applied to vacancy announcements posted on USAJobs.gov. This system does not include applicant data for CFPB executive positions, for non-competitive hiring situations, or for certain hiring authorities outside the public posting process (e.g., Schedule A hiring for persons with targeted disabilities).

Depending on the question of interest and available data, cutoff dates were set to constrain each analysis as appropriate. For example, if the question of interest involved how far applicants progressed in the hiring process, we excluded FY 2015 data because only a few months of data were available for FY 2015. More specifically, the hiring data set was pulled from the system in early February 2015. Announcement close dates for FY 2015 data ranged from 1 October 2014 to 5 February 2015. Some FY 2015 announcements were still open when the data were pulled.

The initial data pull from Career Connector included 214,416 application records, with posting open dates from FY 2011 through the beginning of FY 2015. We executed a number of steps to identify duplicate records and exclude these from further analyses. Unique demographic ID numbers allowed us to identify individuals with more than one record. We designed data screening steps to retain duplicates involving the same person applying for more than one announcement, or applying at more than one point in time; and to screen out duplicates involving records that were updated in some way (e.g., vet status changed, applicant status updated) but involved the same person and announcement. For example, records were retained if they had a unique demographic ID, or a unique combination of demographic ID and announcement number, and so on. As another example, if two records were identical in every way except for vet status code, then one of those records was retained for analyses and the other was screened out. Because vet status was not a variable of interest in these analyses, the selection of which record to retain was arbitrary. Finally, if records were identical except for questionnaire score or applicant status, the record with the highest score or most final status result was

retained and the others were screened out. (Hired status was more final than Selected, which was more final than Best Qualified, and so on.) Thus, we screened out about 5.5% of the records, leaving 202,579 remaining.

Table 1 provides a summary of the cleaned data set, after screening out duplicate records as summarized above. This table also summarizes the announcement open (posted) dates and number of records by fiscal year.

TABLE 1: SUMMARY OF HIRING DATA SET, ALL JOBS INCLUDED

Fiscal Year	Min Open Date	Max Open Date	Fiscal Year Range	Number of Applicant Records
FY 2011-2012	3/31/11	9/28/12	10/1/10 to 9/30/12	74,588
FY 2013	10/2/12	9/30/13	10/1/12 to 9/30/13	47,906
FY 2014	10/2/13	9/30/14	10/1/13 to 9/30/14	60,990
FY 2015	10/1/14	2/5/15	10/1/14 to 9/30/15	19,095
Total				**202,579**

Next, we considered the extent to which this data set might not adequately represent applicants who applied outside of Career Connector, and thus were absent from these data. To examine this issue, we compared numbers of employees on rolls who were hired through Career Connector to those who were hired outside of Career Connector, for 11 CFPB occupations that were mission-critical and/or large-incumbent occupations.

Table 2 shows the results of this comparison, based on the CFPB workforce numbers at the end of 2014.

(b)(5)

TABLE 2: EMPLOYEES ON ROLLS IN 2014, MISSION-CRITICAL OR LARGE-INCUMBENT OCCUPATIONS, HIRED THROUGH CAREER CONNECTOR (CC) VERSUS NOT

Occ Code	Occupational Series	On Rolls from CC	On Rolls Not from CC	Total on Rolls	Occupation's % of Total Population	% in Occupation, Not from CC
0905	GENERAL ATTORNEY	25	243	267	18.5%	91.0%
1101	GENERAL BUSINESS AND INDUSTRY	28	20	48	3.3%	41.7%
1102	CONTRACTING	7	4	11	0.8%	36.4%
0110	ECONOMIST	22	12	34	2.4%	35.3%
0570	FINANCIAL INSTITUTION EXAMINING	258	140	397	27.5%	35.3%
0201	PERSONNEL MANAGEMENT	22	10	32	2.2%	31.3%
0343	MANAGEMENT & PROGRAM ANALYSIS	19	8	27	1.9%	29.6%
0301	MISCELLANEOUS ADMINISTRATION & PROGRAM	229	88	314	21.8%	28.0%
0303	MISCELLANEOUS CLERK & ASSISTANT	31	12	43	3.0%	27.9%
2210	INFORMATION TECHNOLOGY MANAGEMENT	85	26	111	7.7%	23.4%
0501	FINANCIAL ADMINISTRATION & PROGRAM	38	3	40	2.8%	7.5%
	All Others	84	36	119	8.2%	30.3%
Total		848	602	1,443	100%	41.7%

Table 3 provides a summary of the cleaned data set, after screening out duplicate records and removing the 32,027 records involving General Attorney applicants.

TABLE 3: SUMMARY OF HIRING DATA SET, GENERAL ATTORNEY APPLICANTS SCREENED OUT

Fiscal Year	Min Open Date	Max Open Date	Fiscal Year Range	Number of Applicant Records
FY 2011-2012	3/31/11	9/28/12	10/1/10 to 9/30/12	63,329
FY 2013	10/2/12	9/30/13	10/1/12 to 9/30/13	41,375

FY 2014	10/2/13	9/30/14	10/1/13 to 9/30/14	52,460
FY 2015	10/1/14	2/5/15	10/1/14 to 9/30/15	13,388
Total				**170,552**

1.2 Race/Ethnicity Data

During the application process, individuals were asked to voluntarily disclose demographic data. If an individual chose not to disclose demographic data, he or she was categorized as "Undefined." For the purposes of this report, we kept "Undefined" as a separate category indicating race/ethnicity was not self-reported and is, therefore, unknown. We grouped the following race/ethnicity categories as "Other" due to the relatively small numbers of individuals typically found in each of these categories: (1) Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino), (2) American Indian or Alaska Native (Not Hispanic or Latino), and (3) Two or More Races. In addition to "Undefined" and "Other," results are reported for the following categories: (1) Hispanic or Latino, (2) Black or African American (Not Hispanic or Latino), (3) Asian (Not Hispanic or Latino), and (4) White (Not Hispanic or Latino).

2. Hiring by Race/Ethnicity and Hiring Phase

We analyzed CFPB's hiring data for FY 2011 through FY 2014 based on the race/ethnicity of applicants for non-executive and non-general-attorney positions only. For the four-year hiring period under review, we identified the latest hiring phase reached for each applicant. These four hiring phases are the same as those used in similar prior analyses and reflect application processing and assessment-related activities in what is often described as the hiring "funnel." Everyone who submitted at least one application to a particular posting was included in the "Applied" phase. Those applicants whose qualifications were evaluated and found to meet minimum qualifications were considered "Eligible." Applicants whose assessment results were sufficiently strong were considered in the "Best Qualified" phase. Finally, all applicants offered an employment opportunity were in the "Selected" phase.

As described earlier, applicant processing for vacancies posted in FY2015 was not complete at the time of data extraction. These data are not included in the analyses to follow. As a result, 13,748 applications were dropped from the full data set in analyses presented below, leaving a grand total of 156,804.

The four hiring phases were defined and had total sample sizes as follows:

- **Applied:** 42,360 applicants, declared ineligible (i.e., failed to meet minimum qualifications) and did not progress beyond applicant status; 156,804 grand total Applied.
- **Eligible:** 72,571 applicants, declared eligible (i.e., met minimum qualifications) but did not progress to well qualified or best qualified status; 114,444 grand total Eligible.
- **Best Qualified:** 40,527 applicants, declared among the pool of well qualified[1] or best qualified candidates, but were not selected; 41,873 grand total Best Qualified.
- **Selected:** 1,346 applicants who were selected and offered a position, including those who were selected and declined, and those who were selected and then hired; 1,346 grand total Selected.

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[1] The "well qualified" designation is used relatively infrequently, and only in cases where the "best qualified" applicant pool is too small. Therefore, in practice, "well qualified" and "best qualified" applicants are treated the same in terms of hiring process and decision-making.

Results for 156,804 applicants[2] for FY 2011 through FY 2014 are summarized in Figure 1. Size limits prohibit all data labels from displaying in the figure. Appendix A contains all of the numbers in table form. Note the following results:

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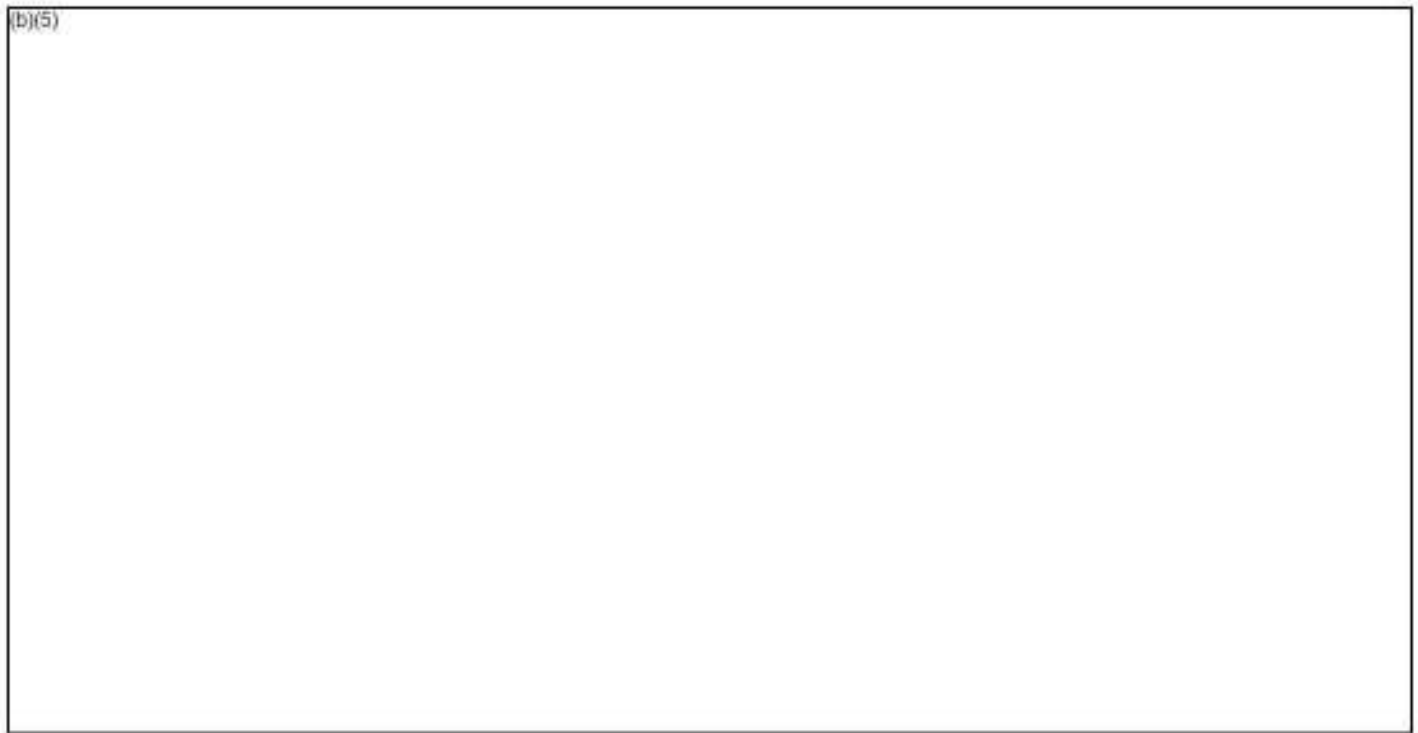
The pattern shown in Figure 1 replicates earlier patterns found by CFPB staff as well as by the Office of Inspector General (OIG, 2015). In order to better understand these results and further enhance CFPB's efforts to promote workforce diversity, we next examined the extent to which this results pattern held under different conditions – such as within particular job groups, year-over-year, and after excluding applicants who self-selected out of the hiring process. These results are presented next.

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[2] Hiring stage was coded as unknown if the announcement close date was 10/1/2014 or later, because these announcements could have still been open when the data were pulled (n = 360).

Ethnicity	Applied	Eligible	Best Qualified	Selected
Undefined	7.2%	7.1%	7.5%	7.1%
Other	2.3%	2.3%	2.3%	1.0%
Asian	8.0%	8.1%	9.0%	11.4%
Hispanic/Latino	7.5%	7.4%	7.3%	6.5%
Black/African Ameri..	34.6%	34.8%	30.2%	19.9%
White	40.4%	40.3%	43.8%	54.1%

2.1 Hiring by Job Group

Next, we investigated the extent to which the race/ethnicity profiles by hiring phase were consistent across job groups, defined by occupation series. We wanted to know, for example, whether the decline in representation for Black/African American applicants in the last two phases of the hiring process was occurring to a greater extent in some jobs than others. Figure 2 shows race/ethnicity profiles by hiring phase for three of the occupations with the largest applicant pools: Economists (occupation series

0110), Examiners (occupation series 0570), and Miscellaneous Administration and Program Series (0301). These occupations are also defined as the CFPB's mission critical occupations. Therefore, further exploration of hiring in these groups was particularly important.

From FY 2011 through FY 2014 there were 2,572; 25,461; and 48,341 applicant records for these job groups, respectively. We considered looking separately at Paralegal applicants as well, but there were comparatively fewer records in this group (2,396) and all applicants progressed at least to the Eligible phase. The "Other" category (n = 78,034) includes all non-executive positions apart from Attorneys, Economists, Examiners, Miscellaneous Administration and Program Series (0301), and Paralegals. Notable results in Figure 2 include the following (see Appendix A for tabulated data):

(b)(5)

(b)(5)

FIGURE 2: APPLICANTS FOR NON-EXECUTIVE POSITIONS BY JOB GROUP[3], RACE/ETHNICITY, AND HIRING PHASE, FY 2011 – FY 2014 COMBINED

Economists (n=2,572)

	Applied	Eligible	Best Qualified	Selected
Undefined	8.0%	7.4%	8.6%	3.8%
Other	1.8%	1.8%	1.5%	0.0%
Asian	15.7%	16.6%	17.8%	19.2%
Hispanic/Latino	8.1%	8.1%	5.1%	7.7%
Black/African American	18.9%	16.6%	9.5%	3.8%
White	49.5%	51.6%	57.6%	65.4%

Examiners (n=25,461)

	Applied	Eligible	Best Qualified	Selected
Undefined	7.0%	6.9%	7.2%	4.5%
Other	2.0%	1.9%	2.0%	1.0%
Asian	8.3%	8.9%	9.6%	8.0%
Hispanic/Latino	7.9%	8.1%	7.3%	8.0%
Black/African American	25.2%	23.6%	20.8%	16.9%
White	49.6%	50.7%	53.0%	61.6%

Misc Admin and Program Series (n=48,341)

	Applied	Eligible	Best Qualified	Selected
Undefined	7.5%	7.3%	7.6%	8.8%
Other	2.4%	2.5%	2.6%	1.4%
Asian	6.5%	6.7%	6.6%	10.1%
Hispanic/Latino	7.2%	7.0%	7.2%	5.8%
Black/African American	36.6%	36.6%	35.8%	24.9%
White	39.6%	39.8%	40.0%	49.0%

Other (n=78,034)

	Applied	Eligible	Best Qualified	Selected
Undefined	7.1%	6.9%	7.4%	7.5%
Other	2.4%	2.4%	2.4%	0.9%
Asian	8.4%	8.5%	9.3%	13.4%
Hispanic/Latino	7.6%	7.5%	7.3%	6.2%
Black/African American	37.4%	37.6%	32.9%	19.2%
White	37.1%	37.1%	40.6%	52.7%

Legend: Undefined, Other, Asian, Hispanic/Latino, Black/African American, White

[3] "Other" includes all non-executive jobs except attorneys, economists, examiners, miscellaneous administration and program series, and paralegals.

2.2 Hiring by Fiscal Year

Next, we investigated the extent to which the race/ethnicity profiles by hiring phase were consistent from one fiscal year to the next. (b)(5)

(b)(5)

(b)(5) Figure 3 shows race/ethnicity profiles by hiring phase by fiscal year, including results for FY 2011-2012 (combined because 2011 was not a full year), 2013, and 2014. Notable results in Figure 3 include the following (see Appendix A for tabulated data):

(b)(5)

FIGURE 3: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY FISCAL YEAR, RACE/ETHNICITY, AND HIRING PHASE, FY 2011 – FY 2014

	Applied	Eligible	Best Qualified	Selected
FY 2011-2012 (n=63,206)				
Undefined	6.9%	6.8%	7.3%	7.5%
Other	2.2%	2.1%	2.1%	0.7%
Asian	7.4%	7.5%	8.5%	10.8%
Hispanic/Lati...	7.3%	7.3%	7.1%	5.8%
Black/African American	33.0%	33.1%	28.4%	21.6%
White	43.3%	43.3%	46.6%	53.7%
FY 2013 (n=41,238)				
Undefined	7.4%	7.1%	7.1%	5.8%
Other	2.3%	2.2%	2.4%	1.8%
Asian	9.0%	9.2%	10.0%	11.0%
Hispanic/Lati...	7.9%	8.0%	7.7%	8.1%
Black/African American	33.4%	33.5%	31.0%	17.7%
White	40.0%	40.0%	41.8%	55.9%
FY 2014 (n=52,360)				
Undefined	7.5%	7.4%	8.0%	8.1%
Other	2.5%	2.6%	2.6%	1.0%
Asian	7.8%	8.0%	8.7%	13.2%
Hispanic/Lati...	7.4%	7.1%	7.1%	5.7%
Black/African American	37.4%	37.9%	32.2%	18.9%
White	37.3%	37.0%	41.5%	52.0%

Legend: Undefined, Other, Asian, Hispanic/Latino, Black/African..., White

3. Other Explanations: Underlying Factors

We posed the following questions:

- Are there race/ethnicity disparities in terms of who self-selects out of the hiring process?
- Does this finding persist if we exclude from analyses those applicants who self-selected out of the hiring process?
- Are there race/ethnicity disparities in terms of who is invited to interview, a step which occurs between the Best Qualified and Selected phases?

The available data allowed us to address these questions only for FY 2014, because this was the first year that detailed applicant status codes were consistently and reliably captured in the data. Results are presented next.

3.1 Applicant Self-Selection

Of the 49,498 applicant records from FY 2014[4], 8.7% self-selected out at some point during the hiring process, compared to 90.7% who did not self-select out and 0.6% unknown. For this analysis, "self-selected out" included applicants who removed themselves from consideration for any reason, including failure to complete all application requirements (e.g., no resume, no transcript, not completing required assessments) and declining interview or job offers for any reason. The majority of those who self-selected out did so in completing and submitting application materials. Declinations were a much smaller group of applicants who self-selected out.

Forms such as the standard form 50 (SF50) Notification of Personnel Action documenting former federal competitive service are needed to determine a person's eligibility for federal employment. Transcripts are required for any position that requires positive education or the specific demonstration

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[4] Non-Executive and non-Attorney positions, excluding announcements that were cancelled

of holding a professional degree. Economists, Statisticians, and Attorneys are the most common such positions at CFPB.

Figure 4 shows the breakdown of all FY 2014 applicants by race/ethnicity, compared to the breakdown of FY 2014 applicants who self-selected out of the hiring process. Note the following:

(b)(5)

FIGURE 4: RACE/ETHNICITY REPRESENTATION, AMONG ALL APPLICANTS[5] AND AMONG APPLICANTS WHO DID NOT SELF-SELECT OUT OF THE HIRING PROCESS, FY 2014
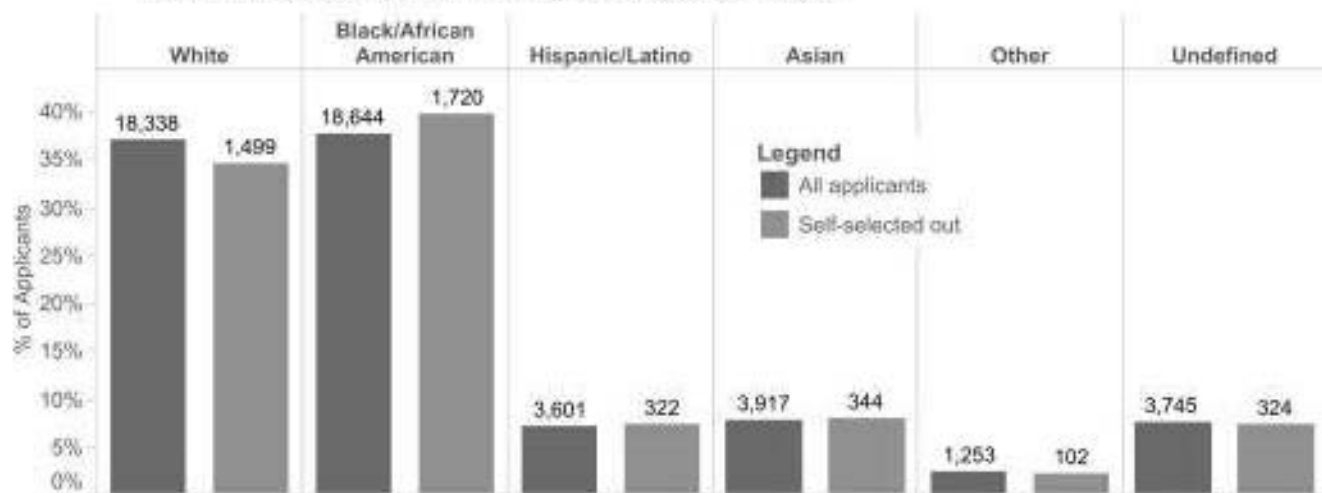
(b)(5)

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[5] Non-Executive and non-Attorney positions, excluding announcements that were cancelled

Figures 5 and 6 show that the FY 2014 patterns for representation by ethnicity and hiring phase remain the same after excluding those applicants who self-selected out of the hiring process. Figure 5 shows the results across occupations and Figure 6 shows results within occupations. Figure 6 omits the Economists, because the sample sizes were relatively small (267 records total, 4 Hired) and thus the patterns could be unreliable. Tabulated data corresponding to these figures appears in Appendix A.

FIGURE 5: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY RACE/ETHNICITY AND HIRING PHASE, EXCLUDING THOSE WHO SELF-SELECTED OUT, FY 2014
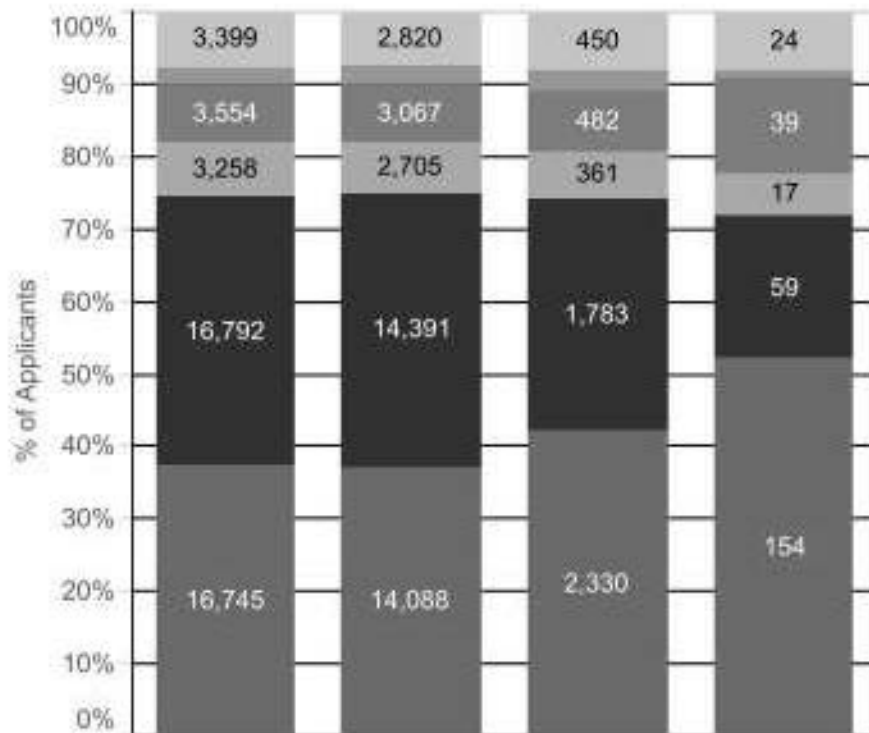
Ethnicity	Applied	Eligible	Best Qualified	Selected
Undefined	7.6%	7.4%	8.1%	8.1%
Other	2.6%	2.6%	2.5%	1.0%
Asian	7.9%	8.1%	8.7%	13.2%
Hispanic/Latino	7.3%	7.1%	6.5%	5.7%
Black/African Ameri..	37.4%	37.8%	32.2%	19.9%
White	37.3%	37.0%	42.0%	52.0%

After excluding applicants who self-selected out of the hiring process, notable results for FY 2014 included the following:

(b)(5)

	Applied	Eligible	Best Qu...	Selected
Examiners (n=5,650)				
Undefined	6.7%	6.5%	7.6%	7.3%
Other	2.1%	2.2%	2.9%	2.4%
Asian	8.3%	8.7%	8.8%	7.3%
Hispanic/Lati...	8.3%	8.4%	7.0%	4.9%
Black/African American	27.7%	27.3%	24.7%	17.1%
White	46.8%	46.9%	49.1%	61.0%
Misc Admin and Program Series (n=12,149)				
Undefined	8.3%	8.2%	7.8%	8.8%
Other	2.8%	2.8%	3.1%	0.0%
Asian	6.9%	7.3%	6.8%	12.3%
Hispanic/Lati...	6.3%	6.2%	5.9%	5.3%
Black/African American	36.6%	36.4%	34.0%	24.6%
White	39.1%	39.1%	42.4%	49.1%
Other (n=26,855)				
Undefined	7.4%	7.2%	8.4%	8.2%
Other	2.6%	2.6%	2.1%	1.0%
Asian	8.2%	8.2%	9.5%	14.4%
Hispanic/Lati...	7.5%	7.3%	6.6%	6.2%
Black/African American	40.1%	40.7%	35.4%	19.6%
White	34.3%	34.0%	38.0%	50.5%

Legend: Undefined · Asian · Black/African... · Other · Hispanic/Latino · White
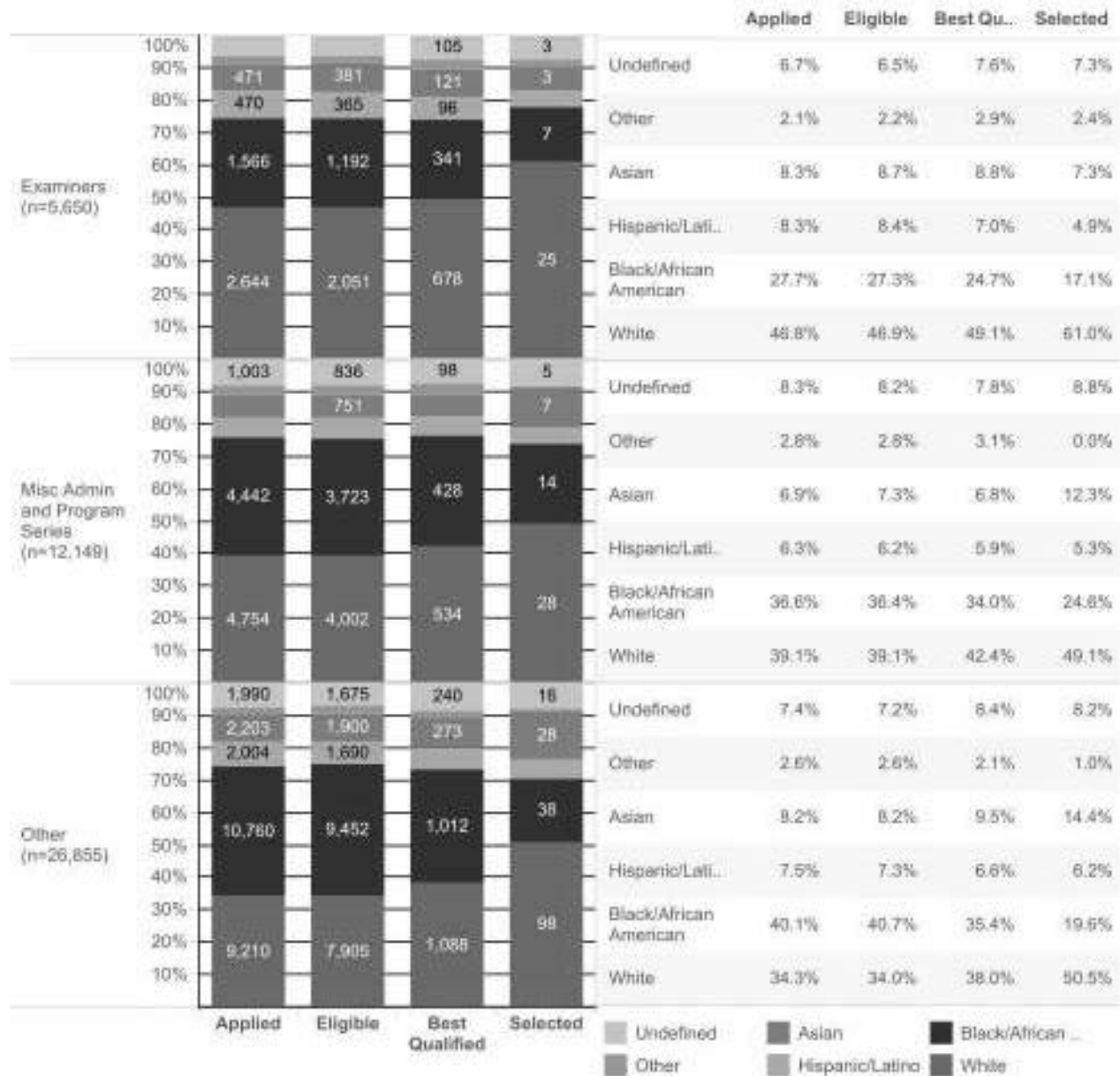
3.2 Hiring Manager Interviews

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The main hiring activities that take place between Best Qualified and Selected are inviting applicants to interview, conducting and making decisions based on interviews, and conducting reference checks for applicants in consideration for selection.

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- 25,789 applicants referred but not invited to interview[6]
- 331 applicants referred and invited to interview[7]
- 6,718 applicants not referred and not invited[8]
- 2,962 applicants on announcements that were cancelled
- 4,243 applicants who self-selected out prior to the interview stage[9]
- 11,863 applicants with interview status unknown[10]

Figure 7 shows race/ethnicity representation among all applicants and by interview status for FY 2014, excluding applicants on cancelled announcements, those who self-selected out prior to the interview stage, and those with interview status unknown. Key findings:

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[6] Applicant status codes: BQ-NN, Eligible-NRNA, or Eligible-NRNR

[7] Applicant status codes: Declined, Hired, or Selected

[8] Applicant status code: Ineligible-INEL, Ineligible-NQEE, Ineligible-NQSE

[9] Applicant status codes: Ineligible (FR, INC, INR, IOTH, ISF5, ITRA, NQSS); or Declined-WITH

[10] Applicant status codes: BQ-BQ, BQ-BQCP, BQ-BQCS, BQ-BQTP, BQ-BQXP, BQ-NCBQ, BQ-NS, BQ-SME, Eligible-NEW, Eligible-REV, Ineligible-NEW, Ineligible-NTIG, WQ-CATB, WQ-NEW

Unfortunately, applicant processing in FY2014 combined applicants who were invited to interview and not selected with those who were not invited to interview (and not selected). The only group of applicants that can reliably be determined to have been interviewed were those made an offer of employment. Upon discovering this processing rule in July of 2015, processing rules were changed to clearly distinguish and reliably code applicants invited to interview with the applicant status code "NS – Not Selected." Going forward, applicants who are not invited to interview will be coded with the applicant status code: "NN – Not Contacted/Not Selected."

FIGURE 7: RACE/ETHNICITY REPRESENTATION[11] BY INTERVIEW STATUS, FY 2014
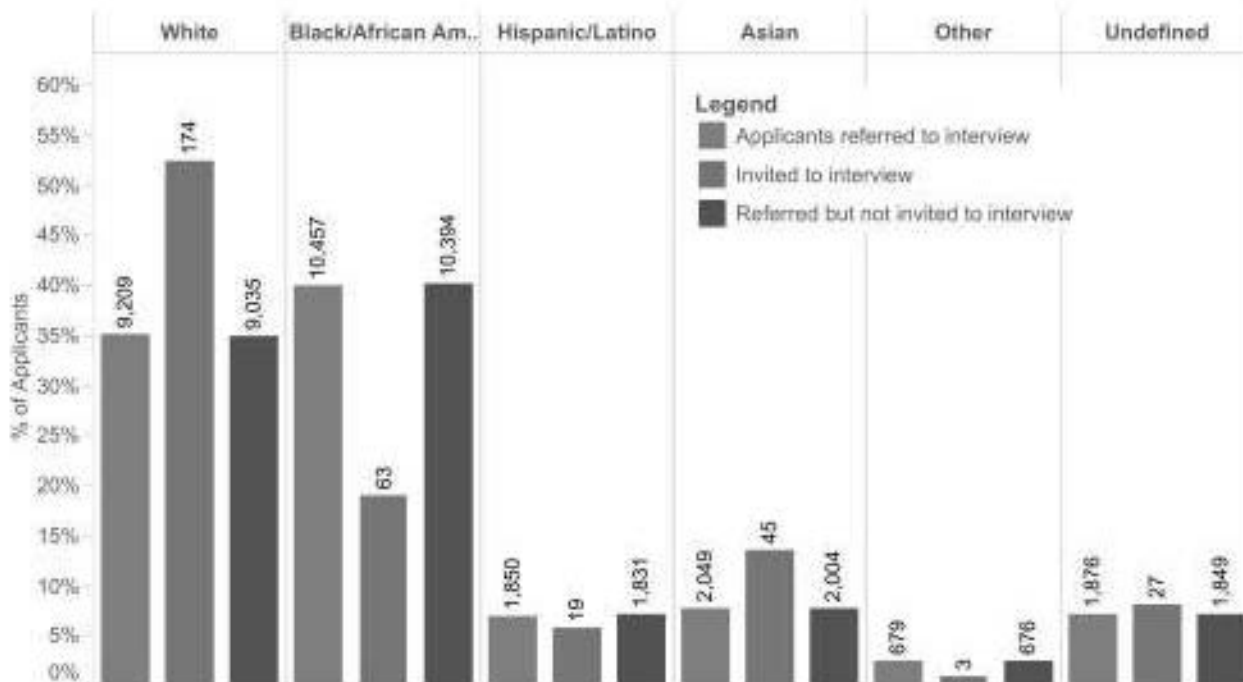
3.3 Custom Applicant Status

The FY 2014 data included custom applicant status codes, which provided additional detail about applicant disposition within each hiring phase. A listing of the system valid applicant custom status code is provide in Appendix C. Figure 8 shows the breakdown of the number of applicants coded into these custom status codes within each hiring phase and race/ethnic group.

Among those who did not progress beyond Applied, the most common reasons for all groups were not qualified due to specialized experience requirements (NQSE) and self-screening out. Federal hiring provides agencies the authority to define the type and degree of specialized experience required to meet minimum qualifications for a specific job. More information about specialized experience determinations may be found through the Office of Personnel Management[12] Applicants who self screen as not qualified (NQSS) respond to a self-assessment question that they do not meet the specialized experience requirements.

(b)(5)

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[11] Non-Executive and non-Attorney positions; all counts exclude applicants who self-selected out prior to the interview phase

[12] (https://www.opm.gov/policy-data-oversight/classification-qualifications/general-schedule-qualification-standards/)

FIGURE 8: CUSTOM APPLICANT STATUS BY HIRING PHASE AND RACE/ETHNICITY, FY 2014

Latest Hiring Stage: Applied

Latest Hiring Stage: Eligible

Latest Hiring Stage: Best Qualified
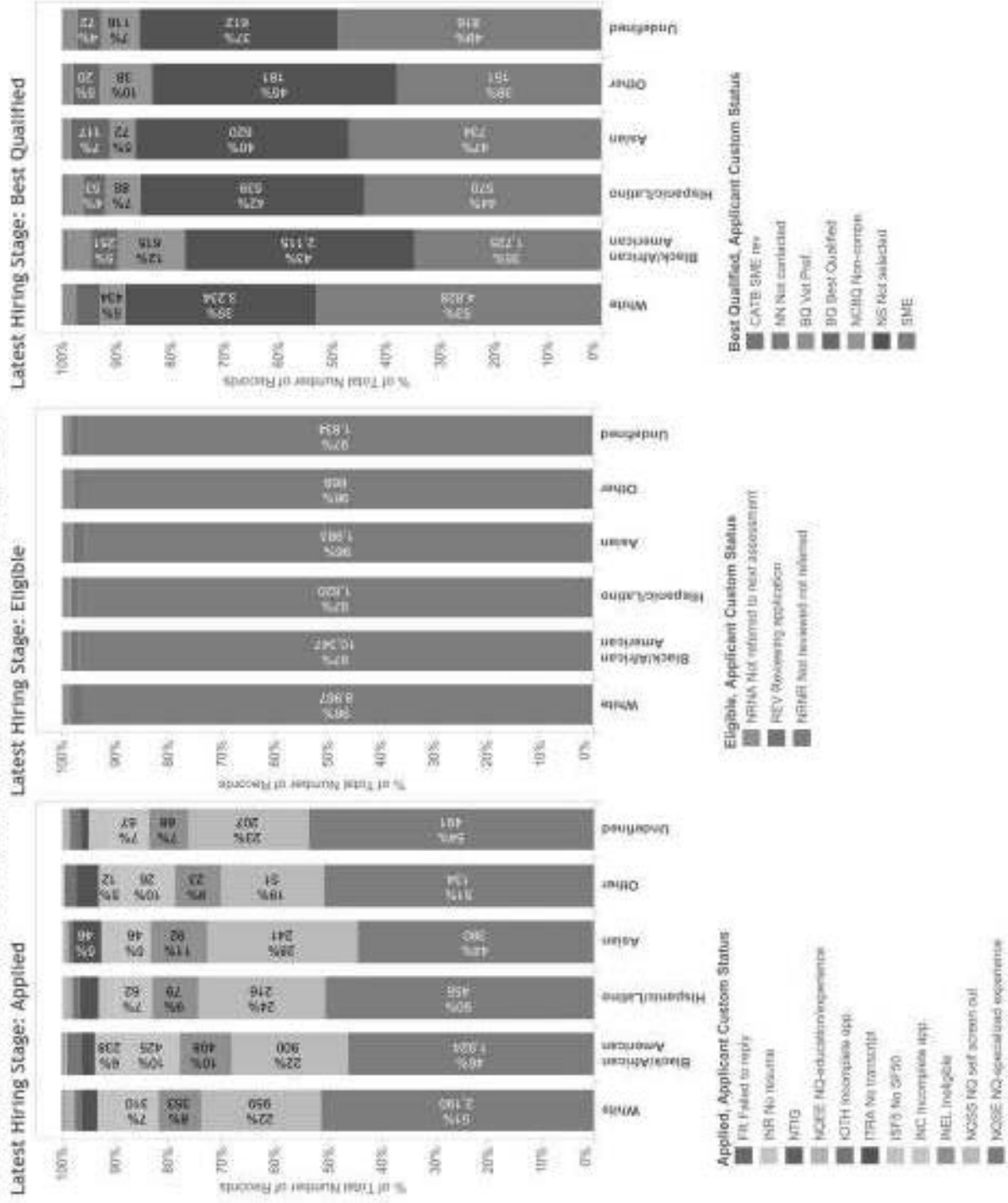
3.4 Applicant Referral

Up to this point, results have focused on four hiring phases: Applied, Eligible, Best Qualified (includes Well Qualified), and Selected (includes Hired). There is another hiring phase in between Best Qualified and Selected, and we examined this next.

Among applicants classified as Best Qualified, one of two things can happen. They are either (1) referred and placed on a hiring manager's certificate of eligibles, or (2) they are not referred and thus not placed on a certificate. Applicants must appear on a hiring manager's certificate in order to be considered for an interview and have the chance to be Selected. Hiring managers do not see applicants who are not placed on to a hiring manager's certificate. This determination – referred or not referred – is outside the discretion of hiring managers' ability to influence decision making.

Federal hiring rules defined under Category Rating specific the conditions under which an applicant may be placed on a hiring manager certificate (aka referral). Referral for hiring under delegated examining rules is often influenced by eligibility for veterans' preference[13]. Under Category Rating rules, an applicant may not be referred if an equally qualified veteran or a veteran with a service-connect disability has been assessed and placed into the same quality category. In a smaller number of other circumstances govern the referral of applicants on a certificate of eligibles for selection consideration.

To understand better the influence under the direct control of CFPB hiring managers, we added a "Referred" hiring phase for the sake of analyses described in this section. Data for these analyses were pulled for FY 2014, including certificate-level data. The same steps discussed earlier were used to prepare the data (e.g., screening out duplicate records, coding new variables such as race/ethnicity and job group). For this analysis, we were interested in discovering the relative influence of Category Rating procedures on the observed changes in the demographic profile of applicants between the Best Qualified and Selected phases. Applicants who were

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[13] Eligibility rules for veterans' preference in hiring are defined for applicants who can demonstrate former military service in specific military campaigns or time periods, and/or who suffered a service connected disability. Information about eligibility for veterans' preference is provide for under Title V of the U.S. Code. Additional information about Category Rating procedures is available under OPM Delegated Examining guidance.

classified Best Qualified and assigned to a hiring manager's certificate were coded as "Referred" for latest hiring phase reached. Otherwise, they remained coded as "Best Qualified."

Some applicant custom status codes remained in the status of "SME," indicating that the applicant was assigned for SME review and was not later placed onto a certificate of eligibles. Final status and close out of certificate processing was not captured by the applicant tracking system if the applicant was not placed onto a hiring manager certificate. Under such circumstances, while the SME review may have assessed the candidate for placement into a different quality category, these records remained coded as "Best Qualified."[14]

We analyzed CFPB's certificate-level hiring data for FY 2014 based on the race/ethnicity of applicants for non-executive and non-general-attorney positions only. The five hiring phases were defined and had total sample sizes as follows:

- **Applied:** 13,970 applicants, declared ineligible (i.e., failed to meet minimum qualifications) and did not progress beyond applicant status. 52,329 grand total Applied.
- **Eligible:** 26,834 applicants, declared eligible (i.e., met minimum qualifications) but did not progress to well qualified or best qualified status. 38,359 grand total Eligible.
- **Best Qualified:** 3,199 applicants, declared among the pool of well qualified or best qualified candidates, but were not referred. 11,525 grand total Best Qualified.
- **Referred:** 7,990 applicants, placed on a hiring manager's certificate and thus available to be considered for interview, but were not selected. 8,326 grand total Referred.
- **Selected:** 336 applicants who were selected and offered a position, including those who were selected and declined, and those who were selected and then hired. 336 grand total Selected.

Results for 52,329 applicants for FY 2014 are summarized in Figure 9. (b)(5)

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However, we noted the following:

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[14] 1,950 of the 11,189 applicants with Best Qualified applicant status had a certificate number containing "SME."

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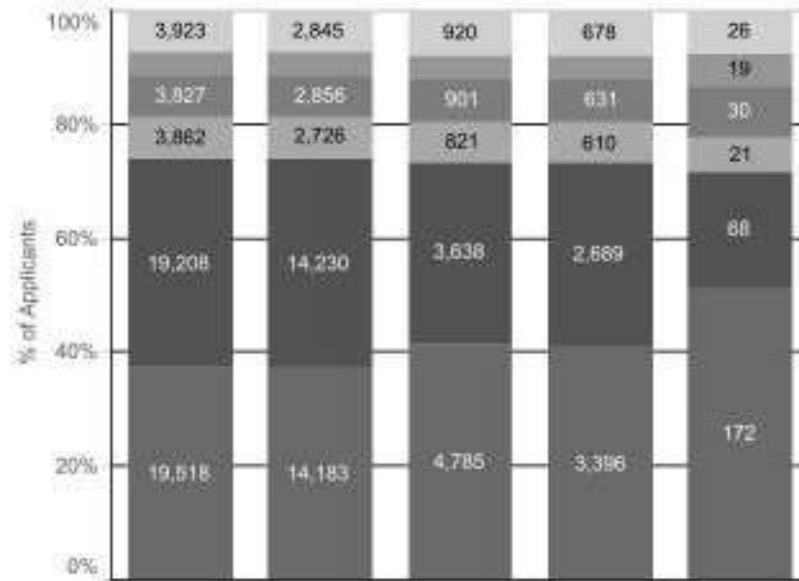
Ethnicity	APPLIED	ELIGIBLE	BEST QUALIFIED	REFERRED	SELECTED
Undefined	7.5%	7.4%	8.0%	8.1%	7.7%
Other	3.8%	4.0%	4.0%	3.9%	5.7%
Asian	7.3%	7.4%	7.8%	7.6%	8.9%
Hispanic/Lati...	7.4%	7.1%	7.1%	7.3%	6.3%
Black/Africa...	36.7%	37.1%	31.6%	32.3%	20.2%
White	37.3%	37.0%	41.5%	40.8%	51.2%

3.5 Hiring by Job Group, Race/Ethnicity, and Hiring Phase (Referred Phase Added)

Finally, we further examined hiring results across five phases, within job groups. Notable results in Figure 10 include the following:

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(b)(5)

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(b)(5)

(b)(5)

FIGURE 10: APPLICANTS FOR NON-EXECUTIVE POSITIONS BY JOB GROUP[15], RACE/ETHNICITY, AND 5 HIRING PHASES, FY 2014

Job Group	Race/Ethnicity	APPLIED	ELIGIBL.	BEST QUALIFIED	REFER.	SELECT.
Economists (n=262)	Undefined	9.9%	10.7%	13.2%	14.7%	0.0%
	Other	3.8%	3.9%	1.1%	1.5%	0.0%
	Asian	14.1%	12.9%	8.8%	10.3%	25.0%
	Hispanic/Latino	6.1%	6.4%	5.5%	5.9%	0.0%
	Black/African A.	10.7%	10.3%	4.4%	2.9%	0.0%
	White	55.3%	55.8%	67.0%	64.7%	75.0%
Examiners (n=8,566)	Undefined	6.8%	6.5%	7.3%	7.2%	8.1%
	Other	3.2%	3.6%	3.7%	2.5%	6.8%
	Asian	7.6%	8.0%	7.9%	9.2%	5.4%
	Hispanic/Latino	8.1%	8.3%	7.0%	7.1%	8.1%
	Black/African A.	28.6%	26.7%	24.5%	26.5%	21.6%
	White	45.8%	46.9%	49.5%	47.5%	50.0%
Misc. Administration and Program Series (n=13,368)	Undefined	8.2%	8.2%	8.5%	8.9%	8.6%
	Other	3.8%	3.8%	3.7%	3.9%	3.4%
	Asian	6.6%	6.9%	6.4%	4.5%	8.6%
	Hispanic/Latino	6.5%	6.2%	6.2%	6.2%	5.2%
	Black/African A.	36.2%	35.9%	34.4%	33.8%	24.1%
	White	38.8%	39.0%	40.8%	42.7%	50.0%
Other (n=30,143)	Undefined	7.4%	7.2%	7.9%	8.0%	7.5%
	Other	4.0%	4.1%	4.2%	4.1%	6.0%
	Asian	7.5%	7.5%	8.4%	8.3%	10.0%
	Hispanic/Latino	7.6%	7.3%	7.5%	7.8%	6.0%
	Black/African A.	39.5%	39.9%	32.6%	33.2%	19.0%
	White	34.1%	34.0%	39.4%	38.7%	51.5%

4. Summary and Conclusions

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When interpreting and developing action plans based on these analyses, the following caveats associated with data limitations should be kept in mind:

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APPENDIX A: DATA TABLES

TABLE 4: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY RACE/ETHNICITY AND HIRING PHASE, FY2011 – FY2014

All Applicants FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.2%	7.1%	7.5%	7.1%	11,314	8,077	3,121	95
Other	2.3%	2.3%	2.3%	1.0%	3,657	2,635	962	14
Asian	8.0%	8.1%	9.0%	11.4%	12,514	9,305	3,762	153
Hispanic/Latino	7.5%	7.4%	7.3%	6.5%	11,712	8,477	3,037	88
Black/African American	34.6%	34.8%	30.2%	19.9%	54,219	39,813	12,633	268
White	40.4%	40.3%	43.8%	54.1%	63,388	46,137	18,358	728
Total	100.0%	100.0%	100.0%	100.0%	56,804	114,444	41,873	1,346
Economists FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	8.0%	7.4%	8.6%	3.8%	206	129	53	1
Other	1.8%	1.8%	1.5%	0.0%	46	31	9	0
Asian	15.7%	16.6%	17.8%	19.2%	404	290	109	5
Hispanic/Latino	6.1%	6.1%	5.1%	7.7%	156	107	31	2
Black/African American	18.9%	16.6%	9.5%	3.8%	487	291	58	1
White	49.5%	51.6%	57.6%	65.4%	1,273	904	353	17
Total	100.0%	100.0%	100.0%	100.0%	2,572	1,752	613	26
Examiners FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.0%	6.9%	7.2%	4.5%	1,773	942	480	14
Other	2.0%	1.9%	2.0%	1.0%	514	257	134	3
Asian	8.3%	8.9%	9.6%	8.0%	2,108	1,225	642	25
Hispanic/Latino	7.9%	8.1%	7.3%	8.0%	2,005	1,108	488	25
Black/African American	25.2%	23.6%	20.8%	16.9%	6,425	3,234	1,383	53
White	49.6%	50.7%	53.0%	61.8%	2,636	6,960	3,533	194
Total	100.0%	100.0%	100.0%	100.0%	25,461	13,726	6,660	314
Misc. Admin. & Program Series FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.5%	7.3%	7.6%	8.8%	3,646	2,685	743	32
Other	2.4%	2.5%	2.6%	1.4%	1,167	897	258	5
Asian	6.5%	6.7%	6.6%	10.1%	3,162	2,440	651	37

Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Hispanic/Latino	7.2%	7.0%	7.2%	5.8%	3,473	2,567	709	21
Black/African American	36.8%	36.6%	35.8%	24.9%	7,802	13,405	3,509	91
White	39.5%	39.9%	40.0%	49.0%	9,091	14,583	3,921	179
Total	100.0%	100.0%	100.0%	100.0%	8,341	36,577	9,791	365

Other Jobs FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.1%	6.9%	7.4%	7.5%	5,502	4,134	1,658	48
Other	2.4%	2.4%	2.4%	0.9%	1,907	1,427	538	6
Asian	8.4%	8.5%	9.3%	13.4%	6,569	5,079	2,090	86
Hispanic/Latino	7.6%	7.5%	7.3%	6.2%	5,909	4,526	1,640	40
Black/African American	37.4%	37.6%	32.9%	19.2%	29,202	22,580	7,380	123
White	37.1%	37.1%	40.6%	52.7%	28,945	22,247	9,110	338
Total	100.0%	100.0%	100.0%	100.0%	78,034	59,993	22,416	641

FY2011-FY2012	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	6.9%	6.8%	7.3%	7.5%	4,339	3,110	1,361	45
Other	2.2%	2.1%	2.1%	0.7%	1,398	968	387	4
Asian	7.4%	7.5%	8.5%	10.8%	4,707	3,455	1,581	65
Hispanic/Latino	7.3%	7.3%	7.1%	5.8%	4,588	3,357	1,313	35
Black/African American	33.0%	33.1%	28.4%	21.6%	20,833	15,200	5,265	130
White	43.3%	43.3%	46.6%	53.7%	27,341	19,899	8,660	324
Total	100.0%	100.0%	100.0%	100.0%	63,206	45,989	18,567	603

FY2013	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.4%	7.1%	7.1%	5.8%	3,049	2,125	839	26
Other	2.3%	2.2%	2.4%	1.6%	938	675	280	7
Asian	9.0%	9.2%	10.0%	11.0%	3,698	2,764	1,184	49
Hispanic/Latino	7.9%	8.0%	7.7%	8.1%	3,260	2,394	903	36
Black/African American	33.4%	33.5%	31.0%	17.7%	13,781	10,093	3,656	79
White	40.0%	40.0%	41.8%	55.9%	16,512	12,057	4,922	250
Total	100.0%	100.0%	100.0%	100.0%	41,238	30,108	11,784	447

FY2015	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.5%	7.4%	8.0%	8.1%	3,926	2,842	921	24
Other	2.5%	2.6%	2.6%	1.0%	1,321	992	295	3
Asian	7.8%	8.0%	8.7%	13.2%	4,109	3,086	997	39
Hispanic/Latino	7.4%	7.1%	7.1%	5.7%	3,864	2,726	821	17
Black/African American	37.4%	37.9%	32.2%	19.9%	19,605	14,520	3,712	59
White	37.3%	37.0%	41.5%	52.0%	19,535	14,181	4,776	154

| Total | 100.0% | 100.0% | 100.0% | 100.0% | 52,360 | 38,347 | 11,522 | 296 |

TABLE 5: DATA TABLES: APPLICANTS FOR NON-EXECUTIVE POSITIONS BY RACE/ETHNICITY AND HIRING PHASE, EXCLUDING THOSE WHO SELF-SELECTED OUT, FY2014

All Applicants FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.6%	7.4%	8.1%	8.1%	3,399	2,820	450	24
Other	2.6%	2.6%	2.5%	1.0%	1,147	988	138	3
Asian	7.9%	8.1%	8.7%	13.2%	3,554	3,067	482	39
Hispanic/Latino	7.3%	7.1%	6.5%	5.7%	3,258	2,705	361	17
Black/African American	37.4%	37.8%	32.2%	19.9%	16,792	14,391	1,783	59
White	37.3%	37.0%	42.0%	52.0%	16,745	14,088	2,330	154
Total	100.0%	100.0%	100.0%	100.0%	44,895	38,059	5,544	296

Examiners FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	6.7%	6.5%	7.6%	7.3%	381	284	105	3
Other	2.1%	2.2%	2.9%	2.4%	118	97	40	1
Asian	8.3%	8.7%	8.8%	7.3%	471	381	121	3
Hispanic/Latino	8.3%	8.4%	7.0%	4.9%	470	365	96	2
Black/African American	27.7%	27.3%	24.7%	17.1%	1,566	1,192	341	7
White	46.8%	46.9%	49.1%	61.0%	2,644	2,051	678	25
Total	100.0%	100.0%	100.0%	100.0%	5,650	4,370	1,381	41

Misc. Admin. & Program Series FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	8.3%	8.2%	7.8%	8.8%	1,003	836	98	5
Other	2.8%	2.8%	3.1%	0.0%	337	287	39	0
Asian	6.9%	7.3%	6.8%	12.3%	844	751	86	7
Hispanic/Latino	6.3%	6.2%	5.9%	5.3%	769	635	74	3
Black/African American	36.6%	36.4%	34.0%	24.6%	4,442	3,723	428	14
White	39.1%	39.1%	42.4%	49.1%	4,754	4,002	534	28
Total	100.0%	100.0%	100.0%	100.0%	12,149	10,234	1,259	57

Other Jobs FY11-14	Percentage by Hiring Phase				Applicant Count			
Ethnicity	Applied	Eligible	Best Qualified	Selected	Applied	Eligible	Best Qualified	Selected
Undefined	7.4%	7.2%	8.4%	8.2%	1,990	1,675	240	16
Other	2.6%	2.6%	2.1%	1.0%	688	600	59	2
Asian	8.2%	8.2%	9.5%	14.4%	2,203	1,900	273	28
Hispanic/Latino	7.5%	7.3%	6.6%	6.2%	2,004	1,690	189	12
Black/African American	40.1%	40.7%	35.4%	19.6%	10,760	9,452	1,012	38
White	34.3%	34.0%	38.0%	50.5%	9,210	7,905	1,088	98

| Total | 100.0% | 100.0% | 100.0% | 100.0% | 26,855 | 23,222 | 2,861 | 194 |

TABLE 6: DATA TABLES: APPLICANTS FOR NON-EXECUTIVE AND NON-ATTORNEY POSITIONS BY RACE/ETHNICITY AND 5 HIRING PHASES, FY 2014

All Applicants FY14 Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Undefined	7.5%	7.4%	8.0%	8.1%	7.7%	3,923	2,845	920	678	26
Other	3.8%	4.0%	4.0%	3.9%	5.7%	1,991	1,519	460	322	19
Asian	7.3%	7.4%	7.8%	7.6%	8.9%	3,827	2,856	901	631	30
Hispanic/Latino	7.4%	7.1%	7.1%	7.3%	6.3%	3,862	2,726	821	610	21
Black/Af. American	36.7%	37.1%	31.6%	32.3%	20.2%	19,208	14,230	3,638	2,689	68
White	37.3%	37.0%	41.5%	40.8%	51.2%	19,518	14,183	4,785	3,396	172
Total	100%	100%	100%	100%	100%	52,329	38,359	11,525	8,326	336

Economists FY14 Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Undefined	9.9%	10.7%	13.2%	14.7%	0.0%	26	25	12	10	0
Other	3.8%	3.9%	1.1%	1.5%	0.0%	10	9	1	1	0
Asian	14.1%	12.9%	8.8%	10.3%	25.0%	37	30	8	7	1
Hispanic/Latino	6.1%	6.4%	5.5%	5.9%	0.0%	16	15	5	4	0
Black/Af. American	10.7%	10.3%	4.4%	2.9%	0.0%	28	24	4	2	0
White	55.3%	55.8%	67.0%	64.7%	75.0%	145	130	61	44	3
Total	100%	100%	100%	100%	100%	262	233	91	68	4

Examiners FY14 Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Undefined	6.8%	6.5%	7.3%	7.2%	8.1%	580	283	129	69	6
Other	3.2%	3.6%	3.7%	2.5%	6.8%	271	157	66	24	5
Asian	7.6%	8.0%	7.9%	9.2%	5.4%	652	351	140	88	4
Hispanic/Latino	8.1%	8.3%	7.0%	7.1%	8.1%	694	364	125	68	6
Black/Af. American	28.6%	26.7%	24.5%	26.5%	21.6%	2,447	1,166	435	254	16
White	45.8%	46.9%	49.5%	47.5%	50.0%	3,922	2,049	879	456	37
Total	100%	100%	100%	100%	100%	8,566	4,370	1,774	959	74

Misc. Admin. & Program Series FY14 Ethnicity	Percentage by Hiring Phase					Applicant Count				
	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Undefined	8.2%	8.2%	8.5%	8.9%	8.6%	1,098	852	237	160	5
Other	3.8%	3.8%	3.7%	3.9%	3.4%	502	396	103	70	2
Asian	6.6%	6.9%	6.4%	4.5%	8.6%	880	714	179	81	5
Hispanic/Latino	6.5%	6.2%	6.2%	6.2%	5.2%	864	643	172	111	3
Black/Af. American	36.2%	35.9%	34.4%	33.8%	24.1%	4,837	3,722	959	606	14

	Applied %	Eligible %	BQ %	Referred %	Selected %	Applied	Eligible	BQ	Referred	Selected
White	38.8%	39.0%	40.8%	42.7%	50.0%	5,177	4,051	1,137	765	29
Total	100%	100%	100%	100%	100%	13,358	10,378	2,787	1,793	58

Other Jobs FY14	Percentage by Hiring Phase					Applicant Count				
Ethnicity	Applied	Eligible	BQ	Referred	Selected	Applied	Eligible	BQ	Referred	Selected
Undefined	7.4%	7.2%	7.9%	8.0%	7.5%	2,219	1,685	542	439	15
Other	4.0%	4.1%	4.2%	4.1%	6.0%	1,208	957	290	227	12
Asian	7.5%	7.5%	8.4%	8.3%	10.0%	2,258	1,761	574	455	20
Hispanic/Latino	7.6%	7.3%	7.6%	7.8%	6.0%	2,288	1,704	519	427	12
Black/Af. American	39.5%	39.9%	32.6%	33.2%	19.0%	11,896	9,318	2,240	1,827	38
White	34.1%	34.0%	39.4%	38.7%	51.5%	10,274	7,953	2,708	2,131	103
Total	100%	100%	100%	100%	100%	30,143	23,378	6,873	5,506	200

APPENDIX B: SYSTEM VALID APPLICANT CUSTOM STATUS CODES

Status Code	Status Description
BQ	Best Qualified
BQCP	Best Qualified - CP[17]
BQCS	Best Qualified - CPS
BQSP	Best Qualified - Sole Survivor
BQTP	Best Qualified - TP
BQXP	Best Qualified - XP
CAN	Announcement Cancelled
CATB	SME Review, Category B
CATC	SME Review, Category C
DA	Declined Agency
DG	Declined grade
DL	Declined location
DZ	Declined for other reasons
FR	Failed to Reply
INC	Not eligible - Incomplete application
INEL	Not eligible for consideration
INR	Incomplete - No resume
IOTH	Incomplete - Incomplete application
ISF5	Incomplete - No SF50
ITRA	Incomplete - No Transcript
NCBQ	Non-Competitive Best Qualified
NN	Not Selected-Not Contacted
NQEE	Not Qualified - Education/Experience
NQSE	Not Qualified - Specialized Experience
NQSS	Not Qualified-Self Screen-out
NRMP	Not Referred Merit Promotion
NRNA	Not Referred to Next Assessment
NRNR	Not Reviewed Not Referred
NS	Not Selected
REV	Reviewing Application

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[17] CP, CPS, TP and XP are formally defined status codes for different types of veterans' preference. The definition and meaning behind such codes can be found in Title V regulation.

Status Code	Status Description
SEL	Applicant Selected
SME	Subject Matter Expert Review
WITH	Withdrew Consideration

Barrier Analysis
Bureau of Consumer Financial
Protection

October 29, 2018
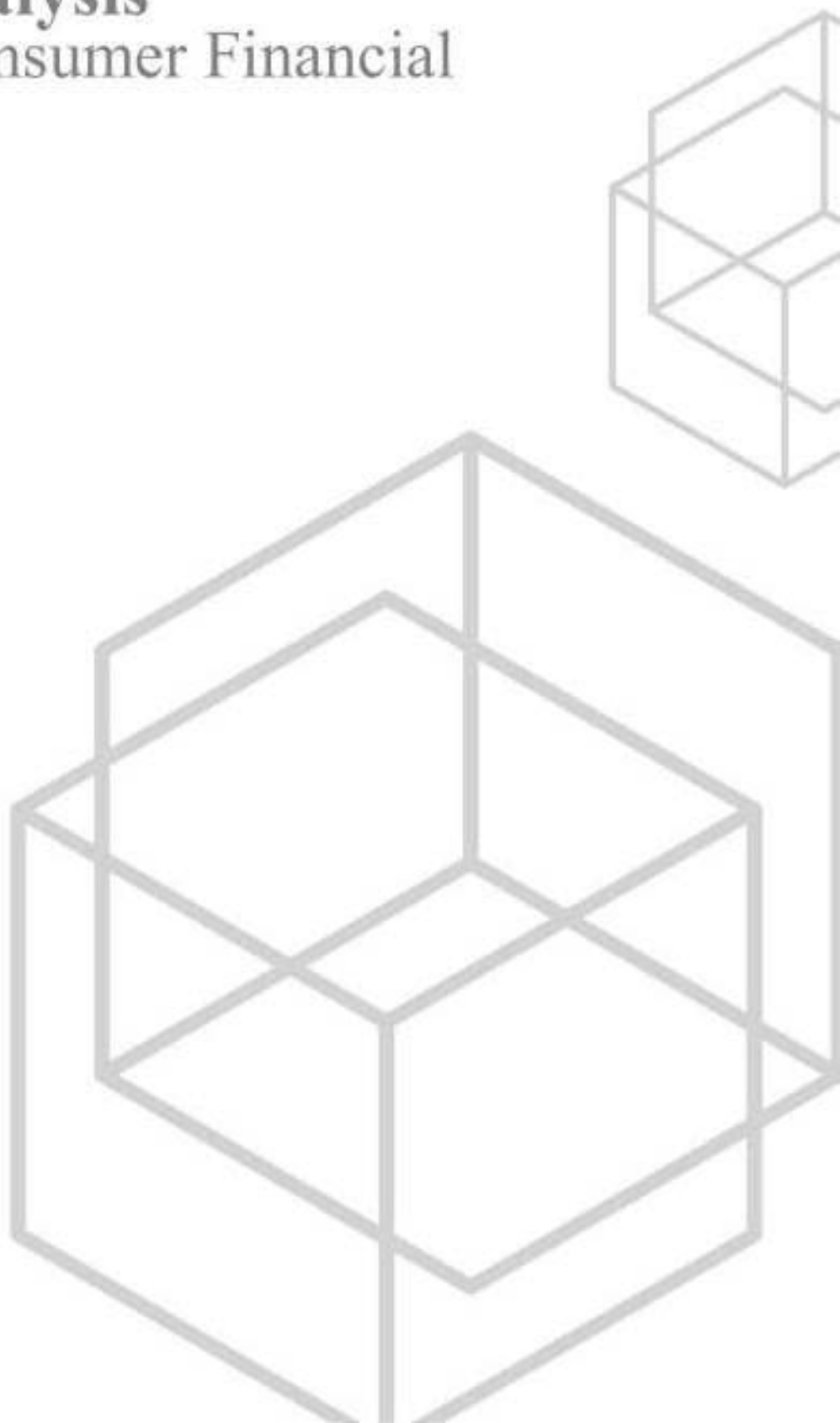
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Executive Summary

The focus of this barrier analysis was to uncover any potential barriers to equal opportunity for African American/Black and Hispanic/Latino(a) employees at the Bureau of Consumer Financial Protection (BCFP). In particular, the focus was on the following three topics:

1. Bureau-wide participation rates in Executive positions for African American/Black males, African American/Black females, and Hispanic/Latina females;
2. Bureau-wide promotion rates/blocked pipelines from CN-52 to Executive for African American/Black males, African American/Black females, Hispanic/Latino males, and Hispanic/Latina females;
3. Participation rates in the Examiner series for African American/Black females and Hispanic/Latina females.

The study involved a document review of BCFP's existing policies related to recruitment, hiring, advancement, and separations and a series of qualitative interviews and focus groups to capture employees' perceptions and experiences. The qualitative interviews and focus groups also provided the opportunity to gauge the current environment and climate at the Bureau, which are important contributors to and indicators of equal opportunity. It should also be noted that there have been significant changes in the Bureau over the past year (2017-2018) due to the leadership transition, which may have impacted the findings.

In total, 139 documents detailing BCFP's policies, practices, and procures were reviewed and compared to best practices in the areas of recruitment, hiring, promotion, and retention. In addition, the qualitative data collection involved conducting twelve in-depth interviews (IDIs) and nine focus groups with African American/Black and Hispanic/Latino(a) employees with a total of 63 participants. Employees were drawn from various occupations and grade levels. Recordings from the IDIs and focus groups were transcribed and those transcriptions were then coded. The findings of the document review and insights from the qualitative data collection were synthesized.

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We have developed 53 recommendations for addressing the above barriers and enhancing diversity and inclusion at the Bureau, more generally. These are presented throughout this report and also aggregated in Appendix J. The recommendations span many topic areas, however key themes among our suggestions include:

I. Introduction

I.A. Background

In 2016, the Equal Employment Opportunity Commission (EEOC) recommended that the Bureau of Consumer Financial Protection (BCFP or Bureau)[1] conduct a barrier analysis regarding its African American/Black employee population (EEOC, 2016). In particular, the EEOC recommended a focus on the representation of African American/Black employees in Executive positions. Furthermore, in 2017, the EEOC and Office of Personnel Management (OPM) recommended that all federal agencies with at least 1,000 full-time equivalent employees (FTE) conduct a barrier analysis on Hispanic/Latino(a) employment, with a focus on employees at the GS-12 through Senior Executive Service (SES) levels (equivalent to the CN-52 through Executive levels at BCFP; EEOC, 2017).

Subsequently, BCFP contracted two external consulting organizations, Personnel Decisions Research Institute (PDRI) and Fors Marsh Group (FMG), to perform various barrier analysis activities examining the selection, participation, promotion, and separation of African American/Black and Hispanic/Latino(a) individuals. A preliminary report of FY 2015 and FY 2016 BCFP workforce data by PDRI identified a number of triggers among African American/Black and Hispanic/Latino(a) applicants and employees that potentially warranted further investigation (CFPB, 2017; see Appendix A). Each trigger was categorized under four stages of the employment lifecycle: recruitment, hiring, promotion, and separation.

I.B. Foci of the Present Research

After extensive discussion, the Bureau's Barrier Analysis Working Group (BAWG), leadership of the Bureau's Office of Equal Opportunity and Fairness, and FMG selected a subset of issues, selected based on resource availability and largest programmatic impact, on which to focus the barrier analysis reported here. Most issues selected for further investigation were triggers that were identified in the aforementioned PDRI report. However, a few additional issues were selected because, although not identified as triggers, they were suggested to FMG as areas to monitor. The EEOC guidance provided (EEOC, 2016; EEOC, 2017) was also followed. The selected issues are summarized below.

I.B.1. Bureau-wide participation rates in Executive positions for (a) African American/Black males, (b) African American/Black females, and (c) Hispanic/Latina females

The first issue area concerns Executive participation by African American/Black males and females and Hispanic/Latina females. The EEOC specifically recommended examining the representation of these groups in Executive positions. Multiple triggers were identified (see Tables 1 and 2) based on the four-fifths standard. The four-fifths (4/5) standard is a standard set

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[1] Formerly the Consumer Financial Protection Bureau (CFPB). The agency was renamed in early 2018.

forth by the *Uniform Guidelines for Employee Selection Procedures* (EEOC, 1978). The standard is typically applied to selection rates to identify adverse impact. Adverse impact is detected when the selection rate for any race, ethnic, or sex group is less than four-fifths (eighty percent) of the rate for the group with the highest rate (EEOC, 1978). Although the EEOC does not require using the 4/5 standard for the present analyses, it can be useful for identifying triggers that warrant additional analysis. Employing this standard helped us to prioritize issues and more usefully target the barrier analysis.

Table 1. African American/Black Participation at the Executive Level

	FY 2016		FY 2015	
	Males	Females	Males	Females
Executive Participation	**5.56% (*n*=3)	**5.56% (*n*=3)	**4.55% (*n*=2)	**4.55% (*n*=2)
Professionals & Other Benchmark[2]	8.48%	12.24%	8.18%	11.10%
Upward Mobility Benchmark[3]	9.72%	11.38%	10.01%	11.70%
Officials & Managers Benchmark[4]	3.70%	5.10%	3.70%	5.10%

*Note. Data from CFPB (2017); * = falls below 4/5 standard for one benchmark; ** = falls below 4/5 standard for two benchmarks; *** = falls below 4/5 standard for three benchmarks.*

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[2] The Professionals & Other benchmark is an internal benchmark comprised of non-supervisory employees who are included in the two occupational categories of Professionals and Other.

[3] The Upward Mobility is also an internal benchmark comprised of target population participation in all for Mission Critical Occupations combined.

[4] The Officials and Managers benchmark is an external benchmark of individuals in the Civilian Labor Force considered a supervisor or management official.

Table 2. Hispanic/Latino(a) Participation at the Executive Level

	FY 2016		FY 2015	
	Males	Females	Males	Females
Executive Participation	5.56% (n=3)	***1.85% (n=1)	6.82% (n=3)	**2.27% (n=1)
Professionals & Other Benchmark	3.15%	2.97%	3.29%	2.92%
Upward Mobility Benchmark	3.54%	2.87%	3.69%	2.85%
Officials & Managers Benchmark	3.70%	3.40%	3.70%	3.40%

*Note. Data from CFPB (2017); * = falls below 4/5 standard for one benchmark; ** = falls below 4/5 standard for two benchmarks; *** = falls below 4/5 standard for three benchmarks.*

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examined policies, procedures, practices, and perceptions that may impact Executive participation for (a) African American/Black males, (b) African American/Black females and (c) Hispanic/Latina females.

I.B.2. Bureau-wide promotion rates/blocked pipelines from CN-52 to Executive for (a) African American/Black Males, (b) African American/Black Females, (c) Hispanic/Latino males, and (d) Hispanic/Latina Females

The second issue area concerns Bureau-wide promotion rates/blocked pipelines from the CN-52 to Executive levels for African American/Black and Hispanic/Latino(a) males and females. Triggers were identified in the participation (Tables 3 and 5) and applicant flow (Tables 4 and 6) rates at the CN-53 grade and above.

Table 3. African American/Black Bureau-wide Participation, CN-52 to Executive Level

	FY 2016		FY 2015	
	Males	Females	Males	Females
CN-52	9.05% (n=19)	16.67% (n=35)	8.76% (n=17)	15.46% (n=30)

	FY 2016		FY 2015	
	Males	Females	Males	Females
CN-53	9.18% (*n*=28)	12.79% (*n*=39)	8.81% (*n*=23)	11.49% (*n*=30)
CN-60	5.05% (*n*=19)	9.57% (*n*=36)	5.36% (*n*=18)	8.04% (*n*=27)
CN-71	4.40% (*n*=11)	6.40% (*n*=16)	4.15% (*n*=10)	6.64% (*n*=16)
Executive	5.56% (*n*=3)	5.56% (*n*=3)	4.55% (*n*=2)	4.55% (*n*=2)
CLF	5.49%	6.53%	5.49%	6.53%

Table 4. CN-53 to Executive African American/Black Internal Selection Applicant Flow (FY 2016)

	Black Males	Black Females
Total Applications	22.40% (*n*=43)	15.10% (*n*=29)
Qualified	*8.33% (*n*=3)	25.00% (*n*=9)
Selected	10.34% (*n*=3)	24.14% (*n*=7)
Permanent Workforce	7.76%	13.05%
Applied UR	2.89	1.16
Qualified UR	0.37	1.66
Selected UR	1.24	0.97

*Note. Data table from BCFP (2017); * = falls below 4/5 standard Utilization Ratios (URs) represent the ratio between a target population rate and benchmark rate (UR < .80 are identified with an asterisk)*

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Table 5. Hispanic/Latino(a) Bureau-wide Participation, CN-52 to Executive Level

	FY 2016		FY 2015	
	Males	Females	Males	Females
CN-52	0.95% (*n*=2)	5.24% (*n*=11)	3.61% (*n*=7)	3.61% (*n*=7)
CN-53	3.93% (*n*=12)	2.30% (*n*=7)	3.07% (*n*=8)	1.92% (*n*=5)
CN-60	2.39% (*n*=9)	2.66% (*n*=10)	2.38% (*n*=8)	2.38% (*n*=8)
CN-71	2.40% (*n*=6)	2.00% (*n*=5)	2.07% (*n*=5)	2.07% (*n*=5)
Executive	5.56% (*n*=3)	1.85% (*n*=1)	6.82% (*n*=3)	2.27% (*n*=1)
CLF	5.17%	4.79%	5.17%	4.79%

Table 6. CN-53 to Executive Hispanic/Latino(a) Internal Selection Applicant Flow (FY 2016)

	Hispanic Males	Hispanic Females
Total Applications	6.25% (*n*=12)	3.65% (*n*=7)
Qualified	11.11% (*n*=4)	*2.78% (*n*=1)
Selected	10.34% (*n*=3)	3.45% (*n*=1)
Permanent Workforce	3.15%	2.74%
Applied UR	1.98	1.33
Qualified UR	1.78	0.76
Selected UR	0.93	1.24

*Note. Data table from BCFP (2017); * = falls below 4/5 standard*

we examined policies, procedures, practices, and perceptions that may impact promotion and advancement of (a) African American/Black males, (b) African American/Black females, (c) Hispanic/Latino males, and (d) Hispanic/Latina females.

I.B.3. Participation rates in the Examiner (0570) series for (a) African American/Black Females and (b) Hispanic/Latina Females

The third topic focuses on minority individuals in the Examiner occupation. The Examiner occupation is a Mission Critical Occupation (MCO) at BCFP and there were several triggers related to the participation (Tables 7 and 9) and applicant flow (Tables 8 and 10) of African American/Black and Hispanic/Latina females.

Table 7. African American/Black Participation in the Examiner Occupation

	FY 2016		FY 2015	
	Males	Females	Males	Females
Permanent Workforce Participation	14.25% (n=61)	8.41% (n=36)	13.33% (56)	8.33% (n=35)
OCLF Availability Benchmark	3.60%	8.70%	3.60%	8.70%

Table 8. African American/Black Applicant Flow in the Examiner Occupation (FY 2015-2016)

Examiners	Males	Females
Voluntarily Identified (New Hire)	16.23% (n=760)	20.82% (n=975)
Qualified (New Hire)	15.48% (n=494)	20.87% (n=666)
Selected (New Hire)	16.85% (n=15)	*7.87% (n=7)

Note. Data table from BCFP (2017); * = falls below 4/5 standard

Table 9. Hispanic/Latino(a) Participation in the Examiner Occupation

	FY 2016		FY 2015	
	Males	Females	Males	Females
Permanent Workforce Participation	4.44% (n=19)	*2.10% (n=9)	4.52% (n=19)	*2.62% (n=11)
OCLF Availability Benchmark	3.10%	3.70%	3.10%	3.70%

*Note. Data table from BCFP (2017); * = falls below 4/5 standard*

Table 10. Hispanic/Latino(a) Applicant Flow in the Examiner Occupation (FY 2015-2016)

Examiners	Hispanic Males	Hispanic Females
Voluntarily Identified (New Hire)	7.92% (n=371)	4.82% (n=226)
Qualified (New Hire)	7.33% (n=234)	5.17% (n=165)
Selected (New Hire)	13.48% (n=12)	*1.12% (n=1)

*Note. Data table from BCFP (2017); * = falls below 4/5 standard*

Table 11. Summary Table of Triggers by Target Population

	Executive Participation		Blocked Pipeline[+]		Internal Selection Applicant Flow	Examiner Participation		Examiner Applicant Flow
	FY15	FY16	FY 15	FY16	FY16	FY15	FY16	FY15-16
African American/ Black Males	X	X	X	X	X			
African American/ Black Females	X	X	X	X				X
Hispanic/ Latino Males			X	X				
Hispanic/ Latina Females	X	X	X	X	X	X	X	X

(Data from CFPB (2017); X's indicate that the proportion fell below the 4/5 standard compared to at least one benchmark for Executive Participation, Internal Selection Applicant Flow, and Examiner Participation. [+]The X's for Blocked Pipeline indicate that the proportion fell below the CLF proportion by any amount for at least one grade. The 4/5 standard was not used in blocked pipeline analyses.

(b)(5)

I.C. General Overview of Employment-Related Issues Facing the Target Populations

(b)(5)

These challenges occur across the employment lifecycle, including obstacles related to: recruitment and selection, career advancement, compensation, and organizational policies. In this section, we describe the unique challenges facing each of these populations in both the general U.S. workforce and the federal sector (where information was available).

First, however, we provide working definitions for five key terms to help guide and facilitate understanding of these findings.

- *Bias*—Evaluations or perceptions that (dis)favor members of a certain group compared to members of others. Bias can be either unconscious (implicit) or conscious (explicit).
- *Disparate treatment*—The intentional treatment of an individual that is less favorable than others based on membership in a protected class.
- *Disparate impact*—When employment practices negatively impact a protected group (i.e., there is a substantial difference in employment outcomes) and is not job-related and justified by business necessity.
- *Employment Discrimination*—When an applicant or employee is treated unfavorably because of his or her membership in a protected class. Discrimination can relate to any aspect of employment, including hiring, pay, job assignments, promotions, firing, layoffs, training, fringe benefits, and any other term or condition of employment (EEOC, n.d.-a). Employment discrimination includes both disparate treatment and disparate impact.
- *Stereotypes*—Beliefs about the characteristics that are associated with a particular group (such as women) and can be conscious or unconscious (Judd & Park, 1993). Unconscious stereotypes may persist even among people who explicitly reject stereotypes.

African American/Black, Hispanic/Latino(a), and female individuals face multiple obstacles to equal opportunity in the workplace. One major challenge is discrimination based on race or ethnicity. Around one-third of all charges of employment discrimination filed with the EEOC in FY 2017 (33.9%) were based on race (EEOC, 2018). Furthermore, in a survey of African American/Black federal employees, 56% reported experiencing "great" or "moderate" discrimination on the job, and were most likely to believe that supervisors practiced favoritism and nepotism (U.S. Merit Systems Protection Board [MSPB], 2009).

Research also suggests that Hispanic/Latino(a) employees face discrimination in the workplace based on their ethnicity. A Pew Research survey conducted in 2016 found that 16% of Hispanics report being treated unfairly by their employer with respect to pay, hiring, or promotion. Furthermore, discrimination based on national origin accounted for approximately 9.8% (8,299) of the charges filed with the EEOC in FY 2017 (EEOC, 2018).

African American/Black and Hispanic/Latino(a) applicants may also face racial bias during selection or promotion processes. Interacting with an individual of a certain race/ethnicity (or gender) can activate an interviewer's stereotypes, which can then evoke associated emotions,

attitudes, or expectations of competence/incompetence and impact how he or she evaluates applicants (see Devrous, Buijsrogge, Roulin & Duyck, 2016). Research has shown that racial bias can impact the résumé review process. Studies have found that applicants with "White-sounding" names listed on their résumés are 36% more likely to be invited for an interview than applicants with "Black-sounding" names. This finding has been shown to be persistent over the past 25 years (Quilian, Pager, Hexel, & Midtoen, 2017). Racial bias can impact other steps of the hiring process, as well. Racial stereotypes and similarity bias (when a person evaluates people who are similar to himself/herself more favorably than those whom he/she perceives to be less similar) can impact evaluations of candidates during interviews or other hiring assessments (e.g., Lin, Dobbins, & Farr, 1992).

Similarly, gender stereotypes can lead to negative outcomes like prejudice and discrimination in the employment process. In particular, women are often stereotyped to have communal qualities (e.g., helpful, nurturing, and gentle) whereas men are often stereotyped to have agentic qualities (e.g., assertive, confident) (Eagly, 1987). These expectations can lead to a perceived "lack of fit" between women and roles that involve agentic qualities (e.g., leadership positions), which can have negative implications for women who apply to or work in jobs or roles viewed as requiring agentic qualities (Heilman, 1983; Lyness & Heilman, 2006). Gender stereotypes may impact all stages of the employment process (recruitment, hiring, promotion, and retention) as well as the work environment. In addition, stereotypes can impact interpersonal treatment at work. Minority women in particular report experiencing more harassment (ethnic and sexual harassment) and incivility compared to ethnic minority men and White women and men (Berdahl & Moore, 2006; Cortina, Kabat-Farr, Leskinen, Huerta, & Magley, 2013). Experiences of harassment and incivility are linked to negative outcomes such as stress, low job satisfaction, and withdrawal (Buchanan & Fitzgerald, 2008; Cortina et al., 2001).

I.C.1. Issues facing African American/Black applicants and employees

In addition to discrimination, African American/Black individuals face additional challenges to achieving equal opportunity in the workplace. In particular, there are obstacles to the recruitment and representation of African American/Blacks in both the workforce, broadly, and in the federal government, specifically. Although African American/Blacks are well represented in the federal government as a whole, they are not equally represented in managerial, professional, and related occupations (U.S. MSPB, 2009; EEOC, 2015). The U.S. MSPB suggests that educational requirements for these professional positions create obstacles for African Americans as fewer possess the bachelor's degree or higher level of education required, as compared to other groups (2009). In addition, recruitment methods in some federal agencies have been found to be limited to non-diverse sources (EEOC, 2013b). For example, in a barrier analysis conducted by the Intelligence Community Equal Employment Opportunity and Diversity Office (2017), members of the intelligence community indicated that recruiting sources are focused on predominantly White recruiting resources (e.g., universities or organizations with primarily White populations)

with less focus on historically Black colleges and universities (HBCUs). It is not clear how widespread this targeted recruitment disparity is across federal agencies.

As previously discussed, African American/Blacks are underrepresented in leadership positions in the federal government (EEOC, 2014; EEOC, 2015). Research offers several explanations for lower representation of African American/Blacks in leadership positions. First, African American/Blacks may have more limited professional networks and fewer mentoring opportunities (Johnson & Eby, 2011; Parks-Yancy, 2010), both of which have been recognized by human capital industry giants (e.g., Deloitte, 2017) as having profound impact on career progression and advancement. Second, underrepresentation of African American/Blacks in leadership positions may be impacted by bias stemming from a commonly held prototype of leaders as White (Rosette, Leonardelli, & Phillips, 2008). Studies have shown that not only do individuals assume that leaders tend to be White, but that this inference occurs regardless of their organization's racial composition (Rosette, Leonardelli, & Phillips, 2008). Third, African American/Black employees have expressed that they perceive limitations in their opportunities to advance and doubt they would be selected for certain positions (U.S. MSPB, 2009); this negatively impacts employee engagement, morale, and motivation to seek additional advancement.

Finally, insufficient opportunities for training and development can contribute to inequalities in skill development among African American/Black federal employees (EEOC, 2013a). Training can build necessary competencies for advancement while developmental opportunities expose employees to duties and experiences that can prepare them for promotion. However, one study found that smaller proportions of African American/Blacks (13.9%) had the developmental opportunity to serve as an acting supervisor compared to White employees (22.3%; U.S. MSPB, 2009). Reduced opportunities to act in a supervisory capacity can limit promotion potential. In addition, the *EEOC African American Workgroup Report* (2013b) suggests that agencies need to establish objective criteria for making decisions about training and developmental assignments, and provide employees with training opportunities related to leadership development (EEOC, 2013a).

I.C.2. Issues facing Hispanic/Latino(a) applicants and employees

Hispanic or Latino(a) employees (defined as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race; United States Census Bureau, 2011), represent a large and quickly growing segment of the U.S. population (Pew Research Center, 2017). Despite this, Hispanic/Latino(a) individuals are not adequately represented in the federal workforce. Although they make up 16.9% of the of the overall U.S. workforce (not taking into account citizenship status; Bureau of Labor Statistics, 2017), they only represent 8.5% of the federal workforce (OPM, 2016b). There are several challenges that Hispanic/Latino(a) individuals face in attaining equal employment opportunity.

First, there are challenges to recruiting Hispanic/Latino(a) individuals. For example, educational requirements for professional jobs in the federal sector can limit the number of Hispanic/Latino(a) individuals in the applicant pool. Hispanic/Latino(a) employees are less likely to have a Bachelor's degree or higher level of education when compared to other racial/ethnic groups (i.e., White or Asian/Pacific Islanders), making them less likely to secure a professional position in the federal government (U.S. MSPB, 2009).

As Hispanic/Latino(a) populations are concentrated in the Southwest portion of the U.S., federal agencies in other areas of the country may find it difficult to recruit Hispanic employees (OPM, 2014). Hispanic/Latino(a) individuals tend to place more emphasis on familial roles and relationships than other populations (Landale & Oropesa, 2007), which may make recruitment away from familial areas more difficult. Thus, the importance of staying close to family could make hiring Hispanic/Latino(a) individuals from different areas of the country more difficult. Research also suggests that Hispanic/Latino(a) millennials are more likely than millennials, in general, to have large extended families to which they provide financial support (Society for Human Resources Management [SHRM], 2016). Therefore, Hispanic/Latino(a) individuals may place more value on certain family-centered benefits when evaluating organizations for potential fit (SHRM, 2016).

In addition to the abovementioned recruiting challenges, Hispanic/Latino(a) employees can face barriers to career opportunities and advancement. In particular, the Hispanic Council on Federal Employment (2017) suggested that some Hispanic/Latino(a) individuals face challenges associated with being a first generation professional. Hispanic/Latino(a) individuals from working class families may not have had much experience with or understanding of the unwritten rules of the workplace, how to tap into and leverage networks, how to manage self-efficacy, and how to build professional confidence. In addition, the Hispanic Working Group recommends that agencies increase access to mentoring programs, detail assignments, and management training for Hispanic/Latino(a) employees to support their career advancement (OPM, 2016b).

Another challenge that Hispanic/Latino(a) employees face in advancement include feelings of exclusion. A survey by the Center for Talent Innovation (2016) found that the majority (63%) of Hispanic/Latino(a) employees in the study reported that they do not feel free to share their ideas and opinions, are not confident that their ideas are being heard and valued, and feel unwelcomed and not included. These perceptions not only diminish the unique insights that Hispanic/Latino(a) employees bring with them to the workplace, but can also hinder their ability to advance.

I.C.3. Issues facing female applicants and employees
The challenges that women face in the workplace relate broadly to career advancement, compensation, and workplace policies and benefits. Despite laudable progress in recent decades, women in the workforce still face barriers to career advancement.

Women are only slightly underrepresented in the U.S. workforce (46.8%; Department of Labor, 2016) and federal workforce (43.3%; OPM, 2014) but they are more significantly underrepresented in leadership positions (Catalyst, 2018). In general, women are promoted at lower rates than men and this promotion gap is larger for women of color (McKinsey & Company, 2017). For example, in S&P 500 companies, women make up 36.9% of first line managers, 26.5% of senior-level managers, 21.2% of board seats, and 5% of Chief Executive Officers (Catalyst, 2018). In the federal workforce, 35.3% of Senior Executive Service (SES) positions were held by women in FY2016 (OPM, 2018).

African American/Black and Hispanic/Latina women are particularly underrepresented in leadership positions. In S&P 500 companies, African American/Black women represent 3.8% of first line managers and 1.3% of senior managers while Hispanic/Latina women represent 3.1% of first line managers and 1.2% of senior managers (White women represent 26.4% of first line managers and 21.8% of senior level managers; Catalyst, 2017).

There are several possible explanations for women's underrepresentation in leadership positions. First, studies have shown that women are evaluated differently than men for the same performance (especially at masculine-typed tasks such as leadership; Heilman, Wallen, Fuchs, & Tamkins, 2004). Being held to more stringent standards to advance can impact women's rates of promotion (Lyness & Heilman, 2006). Other studies suggest that women in general receive less mentorship and other interactions from those in leadership positions, which can negatively affect their ability to leverage personal networks to advance (American College of Healthcare Executives, 2006; McKinsey & Company, 2017). Research has shown that individuals tend to mentor employees with whom they share demographic characteristics (drawing upon the aforementioned similarity bias). This similarity bias in networking and mentoring means that those in leadership positions (predominantly White men) will choose protégés who are demographically similar to themselves, leaving women, who tend to have a narrower, more-female professional network, at a disadvantage (Catalyst, 2003; McKinsey & Company, 2017). In addition, women may not be targeted in recruitment efforts for senior level management positions and selection panels often do not have representation of both men and women (EEOC, 2013b).

Racial/ethnic minority women face additional challenges to advancement. Terms such as "concrete ceilings" or "sticky floors" have been used to describe the challenges that racial/ethnic minority women experience due to the combination of racism and sexism that can impede their advancement (Betters-Reed & Moore, 1995; Edmonson Bell & Nkomo, 2001). The term "glass ceiling" is used to describe the invisible barriers to advancement that women in general face, whereas "concrete ceilings" represent impenetrable barriers to advancement for racial/ethnic minority women. Women faced with a glass ceiling can see through to the next level of advancement and may potentially be able to "break through" the glass, whereas concrete ceilings are impossible to see or break through. The concrete ceiling can sometimes be so low that racial/ethnic minority women are stuck on a "sticky floor" where they cannot advance at all.

One barrier to racial/ethnic minority women's advancement is that racial/ethnic minority women are even more likely than White women to be excluded from social networks (Combs, 2003; Ruderman, Ohlott, Panzer, & King, 2002). In fact, African American/Black women are the most likely to report that they do not interact with senior-level leadership at all when compared to other populations (McKinsey & Company, 2017) and Hispanic/Latina women tend to lack access to mentors, role models, and sponsors (Catalyst, 2003). Also, once in leadership positions, racial/ethnic minority women have reported higher levels of pressure to establish their credibility and make fewer mistakes (Turner, 2002).

Women also face challenges related to equal compensation. Women receive lower pay compared to men in the same positions (EEOC, 2013b). On average, women in the U.S. earn around 80 cents for every dollar paid to a man (National Women's Law Center, 2018), although this amount varies depending on the other variables taken into account (e.g., education, experience, labor market participation). African American/Black and Hispanic/Latina women are at an even greater disadvantage, receiving only 61 cents and 53 cents, respectively, for each dollar earned by White non-Hispanic males (National Women's Law Center, 2018). However, within the federal sector, the gender pay gap has been narrowing over time. A 2007 Government Accountability Office (GAO) study found that women in the federal workforce were paid 91 cents for every dollar that men received (GAO, 2009). To better track trends in the federal sector, the EEOC has recently instituted requirements for agencies to compile and provide additional pay data as part of the MD-715 reporting process.

Inflexible workplace policies can create unique challenges for women in the workforce, as women are more likely to be responsible for a disproportionate share of caregiving and household obligations than their male counterparts (EEOC, 2013b; McKinsey & Company, 2017). Moreover, such unsupportive policies may be especially difficult for populations that emphasize extended-family relationships and associated obligations, such as Hispanic women (Catalyst, 2004). Furthermore, women in senior level positions are significantly more likely to be in dual-career relationships than men at the same level, meaning that they are not as likely to benefit from the support of a partner who stays at home (McKinsey & Company, 2017). Organizational policies and resources such as flextime, telework, and parental leave can ease difficulties associated with balancing work and family demands. However, organizations must also sustain a supportive culture in which such policies are uniformly enacted and made available (including for senior staff and Executives) and their use is not penalized (e.g., Butler & Skattebo, 2004; EEOC, 2013b).

I.D. EEO Best Practices and Recommendations
The EEOC, agencies following EEOC guidance, and organizational and legal scholars have proposed a number of best practices for organizations to follow in order to combat many of the challenges presented above. FMG reviewed best practices focused on promoting equal

opportunity in recruiting, hiring, advancement/promotion, separation/retention, and diversity and inclusion. Recommendations for each employment life cycle stage are summarized below.

I.D.1. Recruitment

Recruitment best practices involve employing a variety of recruitment strategies and hiring authorities in order to attract diverse talent (U.S. MSPB, 2009). The EEOC suggests that job vacancies should be announced via broad and diverse recruitment channels to increase their visibility to diverse audiences (Department of Veterans Affairs, 2010). OPM suggests that agencies "prescribe an open period of at least five business days" (OPM, 2007, p. 65) for job announcements. Although there is no specific guidance or regulation regarding how long a vacancy must remain open, industry best practice suggest that two weeks is the standard minimum amount of time (MSPB, 2015, p. 12). MSPB recommends that agencies should be cautious about opening job announcements for short periods of time because 1) individuals should "be afforded a reasonable amount of time to learn of the job opportunity, and to prepare and submit their application materials" (MSPB, 2015, p. 12), and 2) job announcements with a "short open period may create an impression that the position has been earmarked for someone or that the agency seeks applications only from individuals who have been expressly recruited" (MSPB, 2015, p. 12). Further, in their case studies on federal agencies, MSPB noted that agencies with "lower perceptions of pre-selection, more frequent use of broad hiring authorities, and longer recruitment windows coincided" with a workforce that was more representative of "society at large" (MSPB, 2015, p. 30).

In addition, the selection of schools from which to recruit should include HBCUs, Hispanic-serving institutions, women's colleges, and schools with international programs (Government Accountability Office [GAO], 2005). In addition, organizations should partner with and develop long-term relationships with other organizations or institutions to support recruitment (e.g., multicultural professional institutions; OPM, 2016b). Further, it can be beneficial to employ diverse recruiters or recruiters who are trained on diversity issues (Kravitz, 2008; Rynes & Barber, 1990). Internship and scholarship programs specifically targeting minority applicants can also increase diversity in applicant pools (EEOC, n.d.-b). Finally, all recruiting materials should clearly communicate that diversity is a valued by the organization, that the organization is committed to diversity, and why the organization considers diversity to be important (EEOC, 2013a; Lindsey, King, McCausland, Jones, & Dunleavy, 2013).

I.D.2. Hiring/selection

Successfully hiring or selecting employees from diverse backgrounds requires that an organization conduct job analyses for its positions; use these analyses to create objective, job-related qualification standards that are aligned with business necessity; and apply these standards consistently across candidates (EEOC, n.d. -c; Department of Veterans Affairs, 2010). Educational requirements should not exceed what is necessary to perform the job and organizations should allow for the substitution of professional experience for educational requirements when appropriate (EEOC, 2006; U.S. MSPB, 2009).

Hiring managers and other employees making hiring decisions should be trained on the best practices and methods for the hiring process (e.g., compliance training, increasing awareness of potential biases and methods to reduce biases; Lindsey et al., 2013). This should include reducing subjectivity in the selection process by focusing on only job-related information throughout. Specific methods that can be used during the hiring process to improve equal opportunity include: using assessments with small subgroup differences (e.g., work samples); assessing a range of knowledge, skills, abilities and other characteristics (KSAOs); considering how to use assessment scores (e.g., how to set cut scores, determining whether banding assessment scores is appropriate); and placing greater emphasis on predictors shown to have the least adverse impact[5] (Lindsey et al., 2013). The EEOC (2013b) stresses that bias based on gender, race/ethnicity, caregiver responsibilities, and other protected classes should be addressed to ensure they are not influencing employment decisions. One way to do this is by conducting unconscious bias training and presentations with all employees, including those making hiring decisions.

Methods like structured interviews and mixed-race interview panels have been found to reduce the influence of interviewer biases (Huffcutt & Roth, 1998; Lin, Dobbins, & Farh, 1992; McCarthy, Iddekinge, & Campion, 2010). If selection or interview panels are used to select candidates, panels should include both men and women, and individuals of different races/ethnicities (EEOC, 2013b). Furthermore, including EEO practitioners on panels for higher level positions can help to promote equal opportunity in hiring (OPM, 2016b).

I.D.3. Advancement/promotion

To combat obstacles to advancement, the EEOC advises that criteria for promotion and internal job openings be transparent and communicated to all eligible employees by establishing clear paths to advancement (EEOC, n.d.-c). In addition, developing current employees in order to widen the internal recruiting pool can be achieved by implementing leadership development, mentorship, and internship programs (GAO, 2005). Moreover, through succession planning, organizations can identify and develop a diverse pool of future leadership talent (GAO, 2005).

Federal guidance, including from the EEOC and OPM, suggests that organizations create mentoring programs for minority and female employees that pair lower-level employees with higher-level employees (EEOC, 2013b; OPM, 2016b). It stresses that employees from all backgrounds should have equal access to developmental opportunities like mentoring programs, workplace networks, training, and constructive feedback (EEOC, 2006). Workplace networking can be supported by collaborating with or organizing Special Emphasis Program Managers, affinity groups, and employee resource groups (ERGs) to provide venues for such networking to occur (OPM, 2016b). Furthermore, agencies should focus on ensuring that minority and female

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[5] As Lindsey et al. (2013) explain, this strategy involves assigning greater weight to predictors/criterion measures that have been demonstrated to have the least adverse impact and less weight to those that have shown to have more adverse impact). However, while this strategy may reduce subgroups differences, it can also lower the predictive validity of the assessments.

employees are chosen for developmental assignments and trainings that foster leadership and management skills. Agencies should conduct trend analyses to assess participation rates by race/ethnicity and gender. Promotion potential for employees should be evaluated at regular intervals as part of succession planning. In addition, organizing networking or career development opportunities during the work day can allow employees to attend at times when they do not have caregiver or other family responsibilities. Finally, organizations should continuously monitor promotion, mentoring, and developmental opportunities for employees from protected groups (EEOC, n.d.-b; EEOC, n.d.-c)

I.D.4. Retention

In order to retain a strong, diverse workforce, agencies must demonstrate to both internal and external stakeholders that they highly value EEO and diversity. As the EEOC states: "[E]mployee satisfaction and loyalty begins at the top, with senior officials who: (a) clearly communicate that EEO is an integral part of the agency's mission; (b) ensure that employees from all backgrounds feel accepted, respected, and fairly treated; (c) provide on a fair and equal basis the support and opportunities its employees need to reach maximum potentials; and (d) hold managers accountable when employees leave the agency due to lack of EEO compliance or the lack of effective EEO management" (EEOC, n.d.-d).

Other recommendations for strong employee retention include: ensuring that supervisors and managers have adequate knowledge and skills to develop an inclusive workplace; establishing Special Emphasis Programs and collaborating with affinity groups; including the EEO director in strategic planning; reviewing agency EEO and personnel data; improving advancement opportunities by creating and funding Individual Development Plans (IDPs) and Career Development Programs (CDP); and, conducting employee opinion (climate) surveys and 360 degree evaluations (EEOC, n.d.-d).

Retention is often impacted by inclusion-related policies and practices that impact the climate and culture within the organization (Lindsey et al., 2013). These policies can ensure that all employees have equal access to training and development opportunities (OPM, 2012), equal pay (Griffeth, Horn, & Gaertner, 2000; OPM, 2012), clearly-communicated performance management processes and expectations that include diversity assessments (Kalev et al., 2006; Goldstein & Lundquist, 2010), and equal access to career development opportunities (Goldstein & Lundquist, 2010). Conducting and continuously monitoring the results of surveys (e.g., employee attitudes and exit surveys) to determine reasons for separation provide insight as to the effectiveness of these programs (OPM, 2016b). These surveys can help to determine whether there are any race/ethnicity- or gender-based differences in experiences or attitudes that may contribute to employee turnover.

In addition, benefits and flexible policies that support minority and female employees improve retention rates. Research has shown that Hispanic/Latino(a) millennials are more likely to be responsible for a large extended family compared to other millennials (SHRM, 2016). Incentives

and benefits that support these family responsibilities (e.g., flexible leave, job-protected family leave) may be particularly important to Hispanic/Latino(a) employees. Furthermore, policies that support flexibility (e.g., flexible start and end times, job-sharing, telework, paid leave, and benefits) should be implemented to allow both women and men with caregiver obligations the ability to balance their work and personal responsibilities (McKinsey & Company, 2017; EEOC, 2013b). It is important that the use of these benefits not be stigmatized or penalized and that leadership is trained on these policies to facilitate successful implementation (EEOC, 2013b).

Finally, dissatisfaction with pay is often a key factor that drives employees to leave organizations (Griffeth, Horn, & Gaertner, 2000). Salary/compensation packages should be determined in a way that does not differ based on gender or race/ethnicity. In addition, agencies should frequently audit employee compensation to ensure that there is no differential based on gender or race/ethnicity (EEOC, 2013b). Further, OPM (2016) suggests that agencies should offer additional pay incentives for positions that require Spanish (or other mission-critical) language skills.

I.D.5. Diversity, inclusion, and discrimination

There exist a number of strategies to enhance diversity and inclusion and decrease discrimination against minority groups (EEOC, 2013a; OPM, 2016b). At a basic level, agencies should require that all employees strictly adhere to, and be rewarded for, committing to equal opportunity. Agency leadership should openly commit to addressing workplace inequality by supporting policies and programs that strengthen diversity and combat workplace discrimination and bias. Furthermore, the U.S. MSPB (2009) also recommends that agencies recognize the importance of fair treatment of employees and incorporate supporting practices in order to create an environment that allows employees to speak openly without fear of negative consequences. Finally, agencies should regularly collect and analyze workforce data to monitor effectiveness of workforce management practices and drive improvements (U.S. MSPB, 2009). In addition, organizations should frequently review internal policies and standards (OPM, 2016b), fund EEO programs adequately to limit discrimination, and show that they are committed to following regulations (e.g., by penalizing those committing discriminatory behavior; EEOC, 2013b).

Diversity and inclusion training can be an effective method of enhancing inclusion and reducing discrimination. Research indicates that carefully designed diversity and inclusion training programs can change employees' thoughts, attitudes, and behaviors about diversity (Kalinoksi et al., 2013). Diversity training is most effective when: it employs both active and passive techniques (Kalinoski et al., 2013), is instructor-led, (Kalinoski et al., 2013), is paired with other diversity initiatives (Bezrukova, Spell, Perry, & Jehn, 2016), and is administered over a span of time with multiple opportunities for practice and skill development (Bezrukova et al., 2016). Researchers have found that while voluntary training may produce more positive reactions for trainees, mandatory training is more effective at changing behavior (Bezrukova et al., 2016). Finally, diversity training is more effective when it is paired with other organizational policies and practices that support diversity (e.g., visible support from leadership, inclusive culture;

Bezrukova, Spell, Perry, & Jehn, 2016). Along these lines, organizations should develop diversity strategies/policies that are vocally supported by upper management and understood and enforced by leaders within the organization.

II. Method

We investigated the existence of potential barriers at BCFP via two main research activities: (1) a document review that examined the existence and contents of employment and personnel policies and practices at BCFP and (2) a combination of in-depth interviews (IDIs) and focus groups. The document review involved a detailed review of the current policies related to recruitment, hiring, promotion, and separation and informed the bulk of our BCFP policy audit findings and recommendations. The IDIs and focus groups involved asking a series of EEO-related questions to personnel involved in selection at BCFP as well as African American/Black and Hispanic/Latino(a) male and female employees and Executives across a variety of occupations, grades, and regions.

The document review focused on identifying any potentially problematic or inadequate processes, policies, or documentation while the IDIs and focus groups were primarily conducted to capture employees' perceptions and experiences related to their experiences with the recruitment, hiring, promotion, and separation processes, and diversity and inclusion at the Bureau, more generally. The IDIs conducted with BCFP selection personnel were designed to supplement the findings of the document review with respect to the policy audit. These research activities provide complementary information regarding areas for improvement of equal opportunity at the Bureau and inform our recommendations for changing policies, practices, and procedures to eliminate any potential barriers.

II.A. Document Review

The document review comprised a review of the current policies, procedures, practices, and conditions related to recruitment, hiring, promotion, and separation policies at BCFP. In addition to reviewing policies relating directly to these areas, FMG also collected documentation on related topics (e.g., benefits, professional development and training, disciplinary actions, employee attitudes) from a variety of sources—including EEO complaints or grievances, surveys of employee attitudes related to the workplace, exit survey results, available government reports, and other documents related to benefits, training opportunities, and diversity-related policies. This approach was employed to more fully inform our understanding of potential barriers associated with the previously identified triggers.

We requested the following documents and information from BCFP:

1. Text of all Human Resources policies currently in effect.
2. List of and access to all professional development resources throughout BCFP (including IDP processes, training and development, etc.).

3. List of and access to all HR-related training (including training given to recruiters, hiring managers, selection officials, etc.).
4. All BCFP external job announcements from 2015, 2016, and 2017.
5. Applicant flow data using all of the stages (applied, eligible, best qualified, referred, and selected).
6. Trend data from the Federal Employee Viewpoint Survey (FEVS).
7. Annual Employee Survey (AES), New Employee Survey (NES), and Exit surveys with data breakouts by race and gender.
8. Training evaluation summaries (from Diversity & Inclusion trainings and Examiner Commissioning Program, if available).
9. The number of IDPs currently formalized and on file.
10. All internal hiring announcements.
11. Access to recruitment plan/schedule (if one exists).
12. Documentation of promotion processes currently in effect.
13. Documentation of involuntary separation processes currently in effect.

In total, FMG reviewed 139 documents, which were categorized as follows: recruitment, hiring, benefits, training, development, mentoring, detail assignments, performance management, management, employee attitudes, diversity, disputes/complaints/disciplinary action, separation, and other/miscellaneous. A complete list of the documents obtained and examined is provided in Appendix C.

From this review, FMG identified:

1. Number and type of policies and procedures related to recruitment, hiring, selection, promotion, and separation.
2. Process accountability at all stages (recruitment, hiring, training and development, promotion, and separation).
3. Training and development opportunities (and efficacy thereof based on training evaluations) offered to employees throughout the employee lifecycle (including diversity and awareness training and HR-specific training, such as hiring manager training).
4. Employee attitudes (data tables from the AES, NES, and Exit Survey).
5. Procedures related to employee complaints, grievances, and disciplinary actions.
6. Performance management processes.

We then compared the policies and practices described in these documents to EEO best practices and recommendations. These activities comprised the bulk of the policy audit.

II.B. IDIs and Focus Groups

FMG conducted twelve[6] in-depth interviews (IDIs) and nine focus groups with African American/Black and Hispanic/Latino(a) BCFP employees drawn from various occupations and

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[6] A 13th IDI was conducted. Due to the timing of the interview, we were not able to incorporate the results into our

grade levels. IDIs were conducted with African American/Black and Hispanic/Latino(a) Executives as well as personnel specifically involved with recruiting, selection, or promotion decisions. The primary purpose of the IDIs and focus groups was to identify employee perceptions and experiences with recruiting, hiring, promotion, and separation. Employees with first-hand knowledge of these processes were also interviewed. The IDIs and focus groups also covered related topics such as training and development, mentoring, work details, and employee morale.

II.B.1. Outreach, sampling, and recruitment

Focus groups. FMG, in consultation with BCFP, developed a focus group sampling plan detailing the proposed sampling procedures. A key objective was to maximize the range of experiences and backgrounds of individuals in the focus groups. We considered employee characteristics such as race/ethnicity, gender, occupation, grade, region, and supervisory status. Only permanent employees were invited to participate and care was taken to avoid placing an employee in a focus group with his or her supervisor.

Several efforts were made to inform employees of the upcoming focus groups and encourage participation. Representatives from two Employee Resource Groups (ERGs)—RISE and Adelante—were contacted and asked to share information about the study with their members. In addition, representatives from the Diversity and Inclusion Council of Employees (DICE) and the National Treasury Employees Union (NTEU) were asked to share information about the study with their members employed at BCFP.

Next, BCFP shared relevant employee characteristics (e.g., race/ethnicity, series, grade) and contact information with FMG recruiting staff. No personally identifiable information (PII) was shared with the FMG research team. Employees who met the criteria (i.e., based on race/ethnicity, occupational series, and grade) to participate in a focus group were identified. FMG recruiting staff contacted potential participants using the email template provided in Appendix D, with the participant information sheet provided in Appendix E attached. Participants who responded that they are interested in participating were invited to participate in a focus group.

Nine focus groups were conducted with African American/Black and Hispanic/Latino(a) BCFP employees. Of these nine groups, three consisted of Examiners and six consisted of employees from other series (i.e., non-Examiners). One-third of the focus groups were conducted with African American/Black and Hispanic/Latino(a) employees in the Examiner occupation. One group included supervisory Examiners (CN-60–CN-71) and the other two groups included non-supervisory Examiners, with employees from grades CN-40–CN-51 in one group and employees from grades CN-52–CN-60 in another. FMG recruiters aimed to form groups that were roughly 50% African American/Black Examiners and 50% Hispanic/Latino(a) Examiners (to the extent

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systematic quantitative analyses. However, insights gleaned were integrated into the narrative summary.

possible). FMG recruiters also strived to create groups with an equal gender distribution that included Examiners located in all four regions (Midwest, Northeast, Southeast, West). Because of the geographical dispersion of Examiners, all three focus groups were conducted virtually.

Three additional focus groups were conducted with African American/Black employees (non-Examiners). One group included supervisory African American/Black employees (CN-60–CN-71), the second included non-supervisory African American/Black employees (CN-33–CN-43), and the third included non-supervisory African American/Black (CN-51–CN-60). FMG recruiters aimed for an equal gender distribution and representation across the MCOs as well as other occupations. All three African American/Black employee groups were conducted in person at BCFP headquarters.

Three focus groups were also conducted with Hispanic/Latino(a) employees (non-Examiners). One group included supervisory Hispanic/Latino(a) employees (CN-60–CN-71), the second included non-supervisory Hispanic/Latino(a) employees (CN-30–CN-51), and the third included non-supervisory Hispanic/Latino(a) employees (CN-52–CN-60). Two Hispanic/Latino(a) employee focus groups were conducted in-person at BCFP headquarters. One group consisted of employees who were not located at headquarters and was conducted virtually.

In total, 51 employees (20 Examiners, 31 non-Examiners) participated in the focus groups. Although FMG recruiters strived for equal representation of males and females, due to differing response rates, the groups included approximately 65% women ($n = 33$) and 35% men ($n = 18$). In addition, due to low response rates among Hispanic/Latino(a) employees at the CN30–CN51 and CN60–CN71 levels, the overall representation of Hispanic/Latino(a) employees was lower than anticipated ($n = 18$, or 35%) while African American/Black employees represented approximately 65% ($n = 33$) of the sample. In the Bureau as a whole, African American/Black employees make up 22.0% of the population while Hispanic/Latino(a) employees comprise 6.3% of the population. The measure of a sufficient sample in qualitative research usually is based on the "saturation" of coding categories (Glaser & Strauss, 1967). Saturation refers to when researchers reach a point in which no new theoretical insights or themes are emerging from the data. Although it was not possible given the qualitative research design to gather insights from all employees in the populations of interest, we reached a point at which we perceived that the comments from employees were repeating the same themes, and we had therefore achieved saturation.

IDIs. BCFP provided contact information for male and female African American/Black and Hispanic/Latino(a) Executives. All Executives who satisfied the criteria of the study were invited to participate. BCFP also provided contact information for three employees involved with recruitment, selection, or promotion; these participants were not limited to specific racial or ethnic groups. A BCFP representative from the Office of Civil Rights contacted all potential IDI participants in advance to notify them of the upcoming study and ask whether they would be willing to participate. An FMG recruiter subsequently contacted each individual to schedule one-

hour interviews. Of the 12 IDIs conducted, 11 were conducted face-to-face at BCFP headquarters and one was conducted via phone.

Table 12. IDI and Focus Group Participant Composition

	Number of Participants	Number of Groups
Focus Groups	(b)(5)	
Examiners		
Black & Hispanic Non-Supervisors (CN-40–CN-51)		
Black & Hispanic Non-Supervisor (CN-52–CN-60)		
Black & Hispanic Supervisors (CN-60–CN-71)		
Black Non-Examiners		
Black Non-Supervisors (CN-30–CN-43)		
Black Non-Supervisors (CN-51–CN-60)		
Black Supervisors (CN-60–CN-71)		
Hispanic Non-Examiners		
Hispanic Non-Supervisors (CN-30–CN-51)		
Hispanic Non-Supervisors (CN-52–CN-60)		
Hispanic Supervisors (CN-60–CN-71)		
In-Depth Interviews		
Black and Hispanic Executives		
Selection Personnel		

II.B.2. Procedure

Experienced, RIVA-trained[7] moderators conducted the IDIs and focus groups using semi-structured moderator guides. The moderator guides were tailored to each population (as appropriate given its specific role, responsibilities, and experiences) as well as session type (IDI, focus group). A copy of each guide is provided in Appendix F. All focus groups and IDIs were audio recorded for transcription purposes, only. In addition, a note taker was present during all data collection sessions to observe and document participant responses and reactions that would not have been captured by the audio recordings and subsequent transcripts (e.g., non-verbal cues, facial expressions). All participants were informed that their participation was voluntary; they were free to leave the session at any time and had the right to refuse to answer any questions. Participants were also told that their responses were confidential and would only be reported in aggregate form. Finally, they were informed that neither the audio recordings nor the transcripts would be shared with BCFP and that these would be destroyed once the final report was complete. OCR and FMG officials consulted subject matter experts on records retention and

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[7] RIVA Training Institute provides qualitative research training, including moderating, facilitation and related skills such as brainstorming and ideation. Over the years, RIVA has grown to become the "gold standard" in the qualitative research industry.

these individuals confirmed that not retaining these materials was consistent with federal requirements and the terms of the contract.

Following each IDI and focus group, participants were given the opportunity to complete an optional questionnaire that consisted of two open-ended questions (see Appendix G). Participants were given the option of completing a paper copy of the questionnaire immediately following the session, or online using an anonymous link. All participants ($n = 63$) were invited to complete the questionnaire. A total of 17 participants completed the post-session questionnaire (three participants completed a paper version of the survey and 14 completed the questionnaire online).

Content coding. All IDI and focus group audio recordings were transcribed by a third-party transcription service and stripped of any PII before being provided to FMG research analysts for coding. A codebook was developed in a manner consistent with Glaser and Strauss's (1967) grounded theory approach to qualitative data analysis, which facilitated the identification of emergent themes.

Once the codebook was finalized (see Appendix H), the two independent coders coded the transcripts using the NVivo qualitative data analysis software . Two analysts independently coded each transcript using the codebook. The codebook contained categories for recruitment, hiring/selection, work details, training and development, future career paths/advancement, mentoring, executive coaching, perceptions of diversity and inclusion, work environment, separations, and the Examiner Commissioning Program (ECP). Within each of these topic areas, statements were coded as one or more of the following: positive, negative, informational, or other. In addition, each statement could be flagged as related to diversity and/or related to the participants' personal experiences. Analysts also identified noteworthy quotes and emergent themes as they coded the transcripts.

Cohen's Kappa is a statistic that measures agreement between two coders that is used when coders are classifying items into categories (i.e., categorical data; Cohen, 1960)[8]. We computed Cohen's Kappa to measure inter-coder agreement and the final Kappa based on all 21 transcripts was .63. This provided us with reasonable confidence in the level of agreement among our analysts. After two analysts completed their coding of a particular transcript, a third experienced researcher evaluated and reconciled disagreements between the analysts. Any substantive disagreements in coding that the third researcher could not easily resolve were discussed at a meeting of all three individuals until consensus was reached.

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[8] Cohen's Kappa is a widely accepted measure of inter-rater agreement and is thought to be a robust measure because it takes into account the relative observed agreement among raters as well as the probability that agreement would occur by chance.

III. Findings and Recommendations

In what follows we present the combined findings and accompanying recommendations of the document review and IDIs/focus groups, broken down by employment stage (e.g., recruitment, hiring, promotion). Due to the hiring freeze currently in place at BCFP, the Bureau is not currently engaging in recruitment, hiring, or promotion activities. However, the data were analyzed and recommendations are offered in a manner intended to inform future activities in these areas once the hiring freeze is lifted. Tables summarizing the results of the coding of the IDIs and focus groups, by target population, are provided in Appendix I.

III.A. Recruitment

III.A.1. Document review

The five recruitment-related documents reviewed indicate that (b)(5)

(b)(5)

Specifically, per its 2015–2016 list of recruiting events, BCFP is represented at a number of demographically diverse recruiting events organized by historically black colleges and universities (HBCUs, such as Howard University) and coordinates with multiple minority professional associations (e.g., the National Association of Black Accountants, the National Black MBA Association, and the Association for Latin Professionals in Finance and Accounting) in order to disseminate information about BCFP employment opportunities. In addition, BCFP's 2017 Federal Equal Opportunity Recruitment Plan (FEORP) states that the Office of Minority and Women Inclusion (OMWI) and the Office of Human Capital (OHC) have worked to establish and maintain relationships with minority professional organizations—including the Hispanic National Bar Association, the Association for Latin Professionals in Finance and Accounting, the National Black MBA Association, and the National Association of Black Accountants—and also that BCFP has executed a digital outreach strategy to attract diverse applicants.[9]

Furthermore, the Bureau has enlisted senior leaders and employees to promote the Bureau's identity at outreach events and has provided current employees with recruitment tools and resources (e.g., instructions on how to develop an outreach action plan, templates for expression of interest fliers, lists of recruiting events to reach out to their professional networks). In addition, the 2017 FEORP report notes that the Bureau conducts an ongoing review of policies, programs, and initiatives to ensure that they are inclusive (e.g., telework program, AWS schedule, ability to carry over annual leave, lactation rooms).

FMG also reviewed BCFP's New Employee Survey (NES) data tables for the period of September 2011–September 2017. Responses were summarized by gender, race, ethnicity, grade,

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[9] This involves using DirectEmployers to promote BCFP and publish job opportunities to diverse audiences.

supervisory status, and expected tenure. To protect employee privacy, results were only shared for subgroups with more than 10 employees. Because of this, we were unable to review data for the following sub-groups: African American/Black and Hispanic/Latino(a) male and female team leaders, supervisors, or managers.

The NES asks respondents how they learned about the job opening that they applied to.. The NES data tables from 2011-2017 indicate the most common avenues for learning about BCFP job openings were external websites, BCFP employee referrals, USAJobs, and CFPB.gov/jobs. The least common methods were being contacted by a recruiter, a recruitment/outreach event, or through a university job board/career center/faculty outreach. In addition to providing general information about recruitment strategies, respondents' answers to this item can provide specific insight into how individuals of different races/ethnicities are being recruited by BCFP (see Appendix B).

Examining the NES data split by race, gender, and supervisory status, yields a few observations.

(b)(5)

Due to small subgroup sizes, data tables were not provided at the supervisory level for any minority subgroups (i.e., Black males and females, Hispanic/Latino(a) males and females). This left us unable to explore differences by race/ethnicity among supervisors. Another limitation of the dataset was that it was collapsed across years (2011-2017), which did not allow for the examination of temporal patterns (i.e., changes over time).

III.A.2. Interviews and focus groups

III.A.2.i IDIs.

(b)(5)

(b)(5)

The content of the informational statements spanned several themes, including: descriptions of the methods for announcing job openings (e.g., posting on websites with diverse audiences), descriptions of in-person outreach efforts (e.g., attending diverse career expos and events), and the fact that some managers are more actively involved in recruiting than others. In addition, participants stated that they sometimes find it to be particularly difficult to recruit minority individuals for positions that require specialized skills, given that there is a limited pool of applicants with these skills (e.g., Economist and Examiner positions). Participants also shared that recruiting senior leaders from the private sector often results in an applicant pool that lacks diversity due to the concentration of White males in private sector leadership positions. A suggestion offered for enhancing diversity through recruitment practices was to focus on recruiting from programs that value diversity, such as the Presidential Management Fellows, the Honors Attorney program, or Technology and Innovation Fellows.

Executives. (b)(5)

(b)(5)

(b)(5)

III.A.2.ii. Focus Groups

African American/Black employees. (b)(5)

(b)(5)

(b)(5)

Hispanic/Latino(a) employees. (b)(5)

(b)(5)

(b)(5)

(b)(5)

Examiners. (b)(5)

(b)(5)

(b)(5)

III.A.3. Discussion and recommendations

In summary, the documents reviewed were in accordance with EEO recruitment best practices in that they:

1. Focus on recruiting from a diverse range of universities and professional associations.
2. Outline a digital outreach strategy to announce job opportunities to a diverse audience.
3. Emphasize developing and maintaining partnerships with diverse professional associations.

Each of these types of targeted recruitment activities have been shown to enhance diversity of the applicant pool (Kalev, Dobbin, & Kelly, 2006; see page 14 for further discussion of enhancing diversity in the applicant pool). However, the responses of IDIs and focus group participants suggest that BCFP could benefit from bolstering its activities in all of these areas.

(b)(5)

(b)(5)

The FY 2017 FEORP Report stated that BCFP conducts an ongoing review of policies and initiatives to ensure that they are inclusive and provide necessary support to employees. However, it was not clear from the documents we reviewed how or if these inclusive policies and initiatives are marketed to potential employees.

We did review the current BCFP website careers page, which briefly references BCFP's commitment to diversity and equal opportunity as well as its competitive compensation and benefits. Research suggests that explicitly communicating an organization's commitment to diversity can enhance applicants' perceptions of diversity (e.g., Highhouse, Stierwalt, Bachiochi, Elder, & Fisher, 1999; Rau & Hyland, 2003).

(b)(5)

(b)(5)

(b)(5) Such programs can enhance diversity in recruitment, to supplement competitive hiring (EEOC, n.d.-b; Jayne & Dipboye, 2004).

(b)(5)

The IDIs and focus groups also yielded suggestions of specific programs that could be targeted by diversity-focused hiring initiatives, and also areas where less emphasis might be warranted.

(b)(5)

III.B. Hiring

III.B.1 Document review

We reviewed 25 documents related to hiring processes at BCFP. BCFP's *Hiring, Promotion, and Internal Personnel Movements Policy* and *Hiring Managers Guide* outline the Bureau's hiring procedures. The documents state that hiring managers initially discuss the position with OHC. A job description is either identified or developed based on a job analysis. The hiring manager then works with OHC to determine the appropriate assessment approach. For example, this may involve a self-report questionnaire based on the duties of the position, or a more specialized assessment. The vacancy announcement is posted for a minimum of five days and then a Bureau of the Fiscal Service Human Resource Specialist (BFSHRS) reviews all applications for basic eligibility and minimum qualifications; the results of this assessment are used to place applicants into categories (e.g., qualified, well-qualified, best qualified). Applicants are evaluated on job-related criteria (e.g., job-related experience, training, education, and self-development). The BFSHRS then submits a list of candidates to the hiring manager, who is responsible for interviewing the candidates, checking references, and making a final selection.

Next, because the interview process often introduces the greatest opportunity for subjectivity and bias to impact decision making (e.g., Segrest Purkiss et al., 2006), we considered how BCFP has worked to mitigate this possibility.

The use of highly structured interviews has been shown to reduce the impact of applicants' demographic characteristics on selection decisions (e.g., McCarthy, Iddekinge, & Campion, 2010). The documents we reviewed indicated that BCFP strongly encourages structured interviewer training for lead interviewers and panel interviewers. The structured interview Wiki page indicates that during structured interviews, a panel of interviewers takes detailed notes and then all of the applicants' responses are evaluated using a rating scale and standards for acceptable answers. The lead interviewer is required to have attended the structured interviewer training and to develop interview questions based on required competencies for the position. BCFP's Wiki page also includes descriptions of "Interviewer Biases" and the "Impact of Unconscious Bias on Interviewing."

Another positive step that BCFP has taken is to provide prospective applicants with access to a document called "Tips on navigating job announcements on USAJobs." This document is a guide designed to help applicants who are unfamiliar with the federal hiring process. In addition, during FY 2016-2017, BCFP piloted a résumé blinding process as part of the minimum qualifications review process. The pilot program involves sixteen vacancy announcements, for the 2210 (Information Technology Management), 0301 (Miscellaneous Administration and Program), and 0110 (Economist) series, with grades ranging from CN-52 to CN-71. Résumés were blinded such that all PII was redacted and reviewers only viewed job-related information. We are not aware of the results of this trial. (b)(5)

(b)(5)
as research has shown that names and other information that can indicate race/ethnicity can bias interview requests (e.g., Nunley, Pugh, Romero, & Seals, 2015; Quilian, Pager, Hexel, & Midtoen, 2017) and résumé blinding can reduce subjectivity and bias in the résumé reviewing process (Krause, Rinne, & Zimmerman, 2012).

III.B.2. Interviews and focus groups

III.B.2.i IDIs.

Personnel involved with selection. (b)(5)

(b)(5)

(b)(5)

Executives. (b)(5)

(b)(5)

III.B.2.ii Focus groups.

African American/Black employees. (b)(5)

(b)(5)

(b)(5)
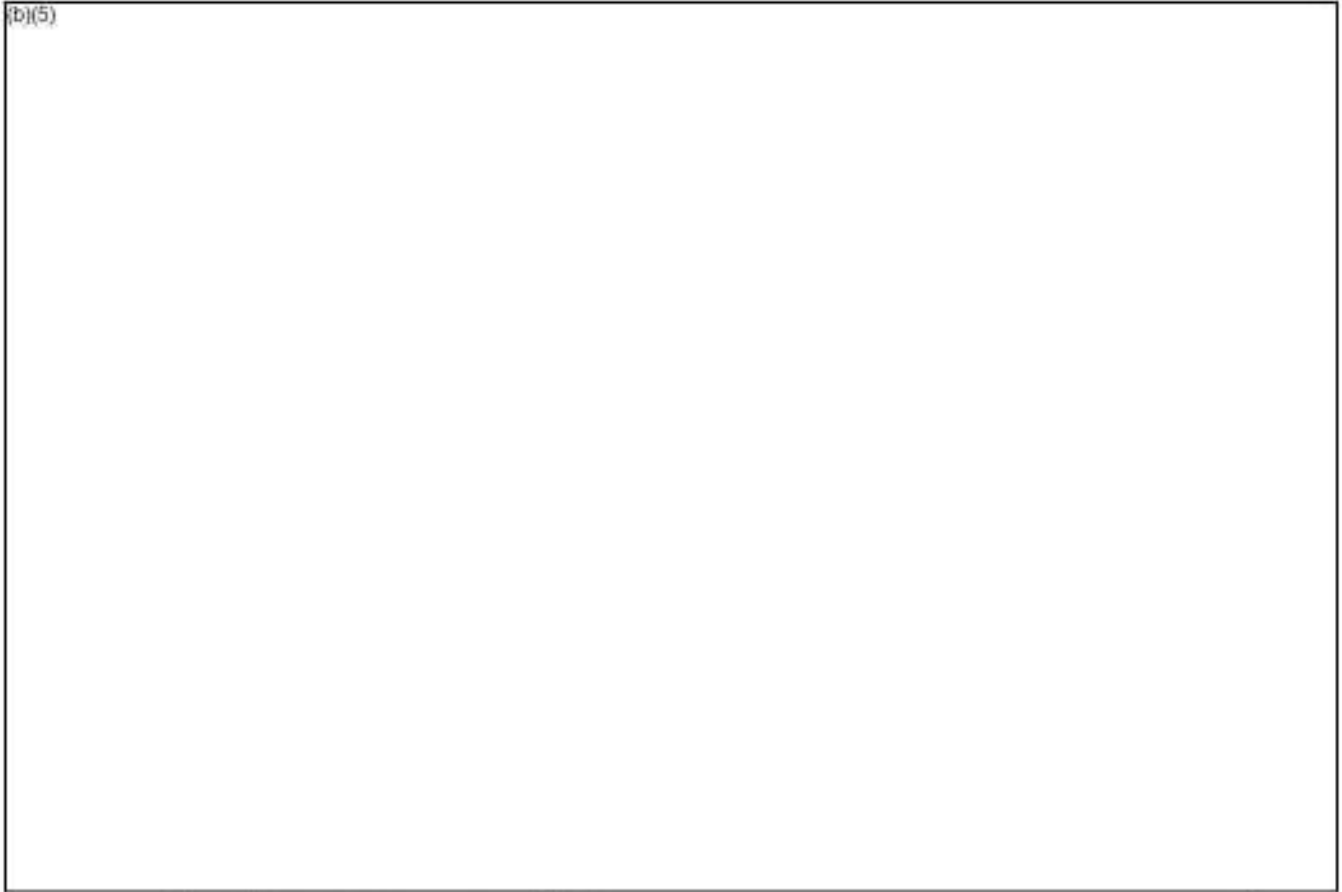
Hispanic/Latino(a) employees. (b)(5)

(b)(5)

(b)(5)
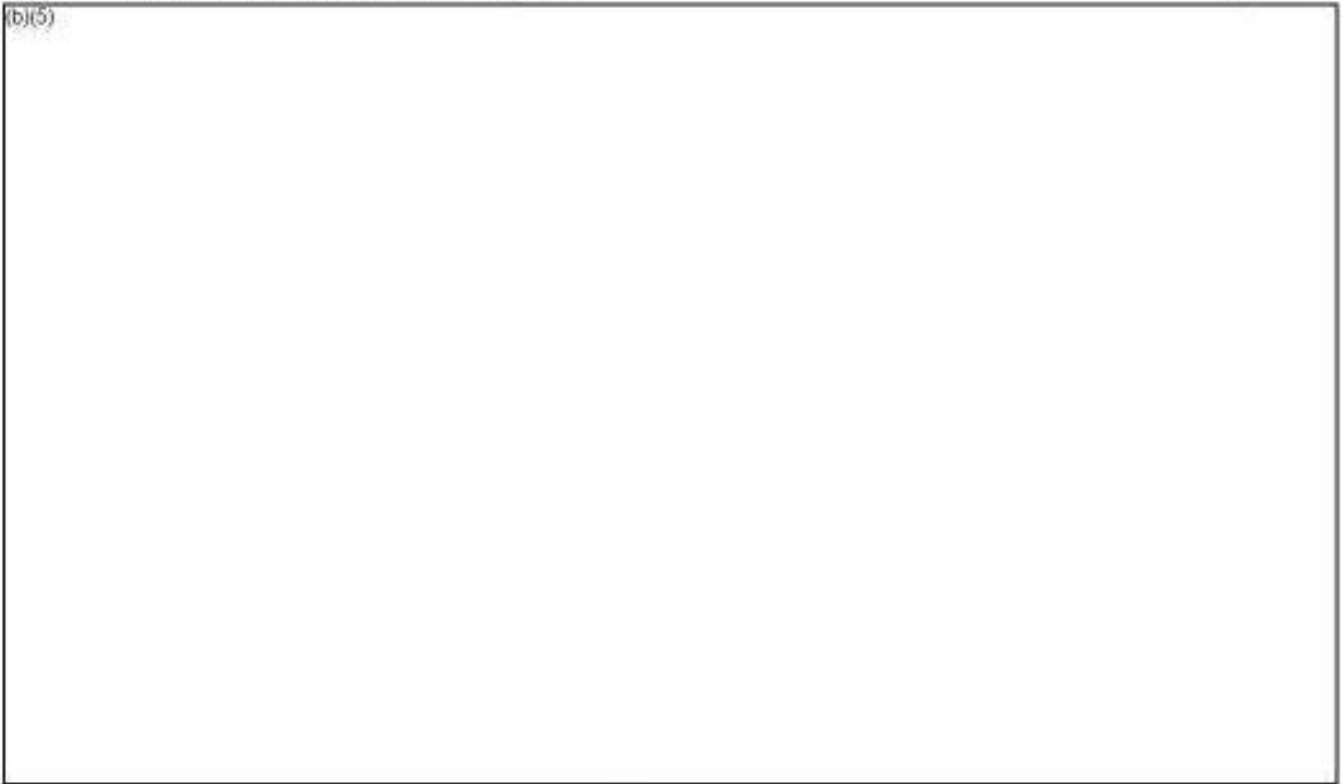
Examiners. (b)(5)

(b)(5)

III.B.3. Discussion and recommendations

(b)(5)

There are multiple entities involved in managing or contributing to diversity in hiring at BCFP—namely, OMWI, OHC, OCR, and DICE— (b)(5)

(b)(5)

Table 14. Summary of Hiring-Related Recommendations

Recommendation	Source	Priority Level
(b)(5)		

III.C. Work Details

We have devoted special attention to the issue of work details as, due to the current hiring freeze, more BCFP employees are applying for details.

III.C.1. Document review

According to the *Internal Detail Focus Group Report*, internal details allow employees to: (a) determine if a job/unit is a good fit, (b) gain exposure to macro-level work, (c) gain experience, and (d) pursue growth, professional development, and networking opportunities. Importantly, per the "Hiring, Promotion, and Internal Personnel Movements Policy," an applicant for internal details "is not required to meet qualification standards for the positions to which he or she is detailed unless the position has a minimum educational or licensure requirement (e.g., Attorney or Economist)."

Detail opportunities are posted on the internal website for all employees to view, in accordance with the requirements of the *Collective Bargaining Agreement* (CBA). The *Hiring, Promotion, and Internal Personnel Movements Policy* states that "supervisors have the discretion to fill positions from any source." The CBA concurs, as long as selection from among interested employees is made in a "fair and equitable manner consistent with the factors identified in Section 3 of [the CBA]" (p. 153).

It is the responsibility of the hiring office to review applicants and select the final candidate. Individuals selecting detailees are strongly encouraged to conduct structured interviews in order to make selections, however, this is not required. Structured interviewer training is also encouraged but not required. The internal focus group report also contains suggestions to improve the internal work details. (b)(5)

(b)(5)

III.C.2. Interviews and focus groups

III.C.2.i IDIs.

Personnel involved with selection. (b)(5)

(b)(5)

Executives. (b)(5)

(b)(5)

(b)(5)

(b)(5)
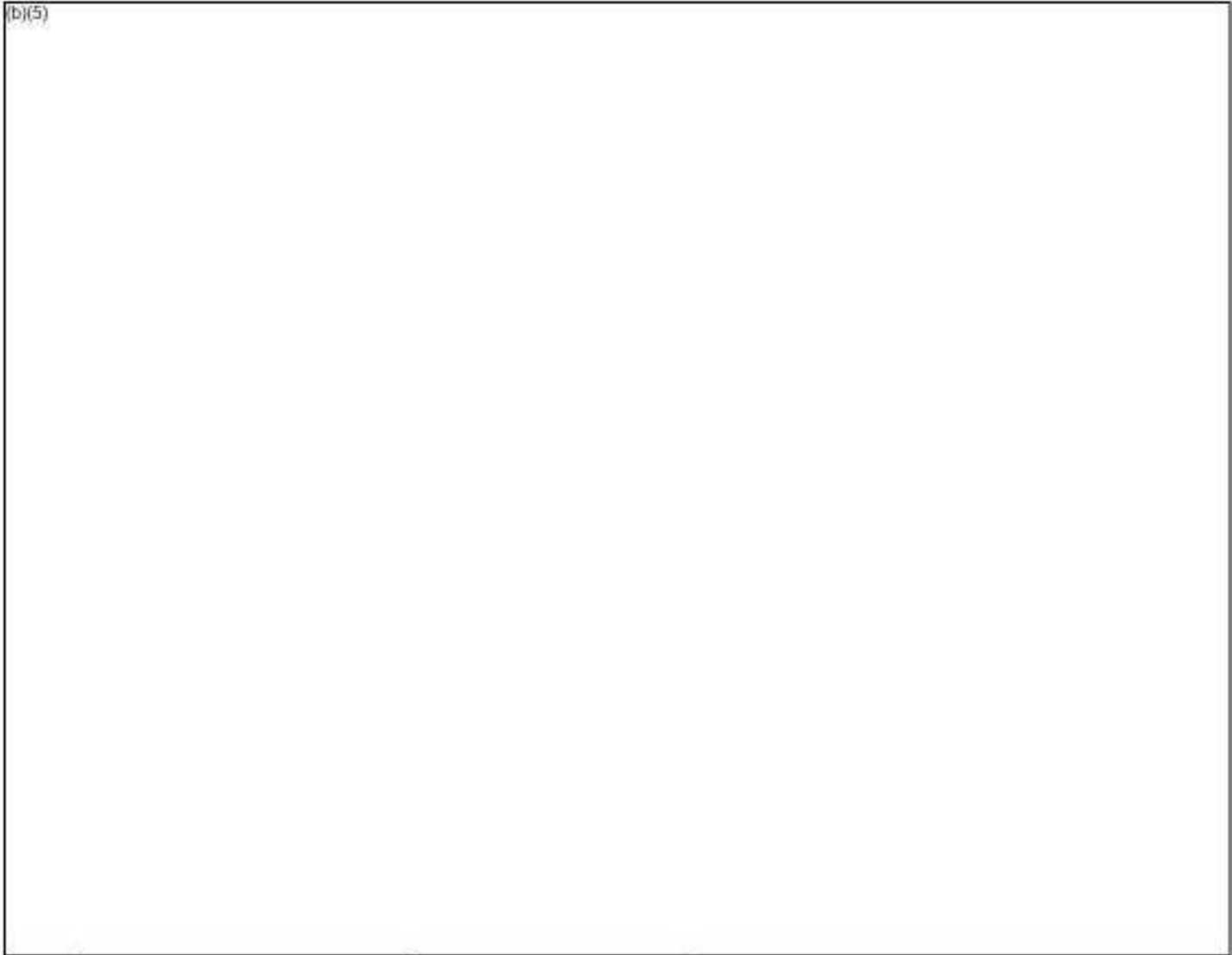
III.C.2.i. Focus Groups.

African American/Black employees. (b)(5)

(b)(5)

(b)(5)

go on work detail

Hispanic/Latino(a) employees. (b)(5)

(b)(5)

Examiners. (b)(5)

(b)(5)

III.C.3. Discussion and recommendations

(b)(5)

Table 15. Summary of Detail-Related Recommendations

Recommendation	Source	Priority Level
(b)(5)		

III.D. Promotion

III.D.1. Document review

We reviewed 52 documents related to several areas that may impact promotion, namely:

1. Performance management
2. Employee recognition and awards
3. Training, development, management

4. Mentoring

Promotion-specific policies and practices. We first reviewed *BCFP's Hiring, Promotion, and Internal Personnel Movements Policy*, which describes the procedures associated with merit promotions. The policy states that OHC works with hiring managers to identify or develop a position description, job analysis, and assessment process prior to posting the vacancy announcements. OHC requires that each of these steps be completed before opening a vacancy announcement.

Announcements are advertised at least Bureau-wide and if desired, managers can expand to external sources like the BCFP Jobs Website and USAJobs. The postings must be open for a sufficient period of time to attract a sufficient candidate pool (typically five business days). Applications are collected via an automated staffing tool. Applicants are then evaluated on job-related criteria as listed in the vacancy announcement (e.g., experience, performance appraisals, incentive awards, training, education or self-development) determined by the hiring manager or another subject matter expert. These criteria are then used to determine the best qualified candidates. The relative weight of the criteria and the way in which they were used prior to the hiring freeze is documented in the merit promotion file. Methods for evaluating candidates include: occupational questionnaire, review and rating by a panel of subject matter experts, and structured interview ratings. Based on its evaluations, OHC develops a list of eligible candidates ("referral lists" or "certificates of eligibility") from which the hiring manager may select. The hiring manager can decide to select or not select.

The document also describes the policy regarding career ladder promotions. The policy states that employees who compete for designated career ladder positions may be selected at any band within the ladder for which they qualify. It is emphasized that career ladder promotions are not automatic or guaranteed but, rather, to advance there must be sufficient work at the next higher band and the employee must meet several requirements (e.g., must meet qualifications of next band, demonstrate ability to perform the work required at the next level, and be rated as a "solid performer" or higher on any critical element). Managers decide whether employees meet these requirements.

Finally, *BCFP's Hiring, Promotion, and Internal Personnel Movements Policy* states that the Chief Human Capital Officer periodically reviews BCFP's merit promotion policies.

Employee attitudes. The AES 2017 report and FY 2012-2017 data tables, summarize employees' level of agreement with the statement "promotions in my work unit are based on merit." In the 2017 AES Report, BCFP adopted a more stringent criterion for flagging items (those with 25% or more responding unfavorably) than the guidance set forth by OPM (to flag items with 35% or more responding unfavorably).

The "promotions in my work unit are based on merit" was identified as a "challenge/issue to watch," as 29.1% of employees disagreed or strongly disagreed with this item. This percentage

was roughly comparable among White (27.6%), African American/Black (21.4%), and Hispanic/Latino(a) (26.1%) employees, although the attitudes of African American/Black employees appear to be slightly less negative than those of the other two groups. We also looked at data tables from the FY 2012-2017 AES surveys, which summarized results by both race/ethnicity and gender.[10] (b)(5)

(b)(5)

The AES also asked, "How satisfied are you with your opportunity to get a better job in your organization?" The results show relatively similar levels of satisfaction among White (43.4%), African American/Black (41.5%), and Hispanic/Latino(a) employees (49.5%), although satisfaction levels of Hispanics do appear to be somewhat higher than the other two groups. When examining the results by race/ethnicity and gender, (b)(5)

(b)(5)

Performance management. (b)(5)

(b)(5)

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[10] The data were provided broken down by Ethnicity (Hispanic/Non-Hispanic), by Gender, and by Race by Gender. The race by gender data were not exclusively non-Hispanic individuals, so there could be some individuals included in these categories (White, Black) who are also Hispanic.

(b)(5)

We also reviewed items related to performance management from the 2017 AES report. Several

(b)(5)

(b)(5)

(b)(5)

Recognition and awards. According to the documents reviewed, OHC launched a formal
Awards and Recognition program in FY 2016. We reviewed the data provided in BCFP's FY
2017 MD-715 A13 table: Employee Recognition and Awards–Distribution by Race/Ethnicity
and Sex. This table provides a breakdown of the race/ethnicity and gender of the individuals who

received time-off awards (1-9 hours, 9+ hours) and cash awards ($100-$500 and $500+). It should be noted that the MD-715 data does not reflect the entirety of the results for the first cycle of the program. The MD-715 data is limited to FY2016 but the Awards and Recognition program runs on a different program year cycle. Data from the full first cycle may show different results.

In 2017, nine employees were given time off awards between 1-9 hours. Of these, 66.7% were White (two males and four females) and 33.3% were African American (no males, three females). No Hispanic or Latino (either male or female) received time-off awards. Among employees who received awards of 1-9 hours, White employees (males and females combined) received a total of 48 hours off; African American employees a total of 24. The amount of hours awarded averaged out to eight for each recipient.

During 2017, ten employees received time-off awards of greater than nine hours. White employees represent 70.0% of total recipients, as opposed to African American employees, who constitute 20.0% of award recipients, and Hispanics, who did not receive any time-off awards. The average amount of hours awarded was 20.6 for White employees (males and females combined) and 20 for African American employees (males and females combined). The

(b)(5)

As with time-off awards, (b)(5)

(b)(5)   White employees represent 57.5% of total recipients (lower than their overall representation in the Bureau), while African Americans represent 24.9% (higher than their overall representation in the Bureau), and Hispanics represent 7.7% of total recipients (higher than their overall representation in the Bureau). The average amount of award, however, shows that (b)(5)

(b)(5)

(b)(5)

For cash awards greater than $501, White employees (males and females combined) represent 69.3% of the 322 total recipients, with African American and Hispanic/Latino[a] employees (males and females combined) representing 13.7% and 5.3% of total recipients, respectively. African American males represent 5.3% of total recipients while African American females represent 8.4%; both figures are below their representation rates in the overall BCFP workforce

(males: 8.0%, females: 13.9%). Similarly, Hispanic males represent 3.1% of total recipients and Hispanic females represent 2.2%, which are also both below their BCFP workforce representation rates (males: 3.3%, females: 3.0%). All examined demographic groups received similar average award amounts (White: $1,106; African American: $1,090; Hispanic: $1,189), although, as above, African American females received, on average, the lowest amount ($1,035).

We also reviewed results for an item in the AES regarding awards. Overall, 55.4% of employees agreed or strongly agreed that awards in their unit depend on how well employees perform their job, although African American/Black employees were somewhat less likely to agree as compared to White and Hispanic/Latino(a) employees (White: 59.9%, Hispanic/Latino: 61.7%; African American/Black: 51.5%). We also reviewed the results of this question in the 2012-2017 AES tables. These tables suggest that (b)(5)

(b)(5)

Training. We reviewed documents related to training to identify any areas for improvement as they may relate to promotion. Overall, the documents reviewed (b)(5)

(b)(5) We also reviewed an extensive list of SkillSoft courses that are available to employees. The *External Training Policy* states that employees can spend up to 80 hours and $4,000 per year on external training, contingent on supervisor approval.

BCFP has also introduced "Crucial Conversations" training to help employees navigate high stakes conversations at all levels of the organization. This resource, provided by external vendors and instructors, (b)(5)

(b)(5) We also reviewed training evaluations from the Crucial Conversations training. The reviews were generally very positive—respondents reported that the trainers were engaging, related the material to their work environment, and in some cases actually expressed a desire for the training to be even longer. There were, however, a few suggestions to increase the representation of females and racial/ethnic minorities in the training videos.

We also reviewed responses to the AES item "How satisfied are you with the training you receive for your present job?" In the 2017 AES report, (b)(5)

(b)(5)

We also reviewed several documents related to the Examiner Commissioning Program (ECP). Other federal financial regulatory agencies also have established programs to train examination staff; these usually involve the apprenticeship program of around 3-5 years and BCFP aimed to develop a program that was similar to these programs (SEFL Staff Memorandum, 2014). The ECP involves a series of trainings and experiences designed to prepare employees in the Examiner series to become commissioned Examiners. The Supervision Learning and Development (SL&D) schedule describes a variety of courses offered—such as *Writing for Examiners I & II, Advanced Communications, EIC Team Lead Skills*—and related coursework and online resources. In addition, Examiners are required to serve as the Examiner in Charge (EIC) twice prior to being commissioned. At the end of the ECP, Examiners must pass a multiple choice test and a case study assessment in order to be commissioned (SEFL Staff Memorandum, 2014). Examiners are provided a study guide for the 150-item multiple choice test that includes a description of the content areas and sample questions.

A cut-off of 70% has been established for the multiple choice test, such that a score below 70% results in a failure. A score of 70-75% is a "conditional pass" in which the individual must complete additional study in the areas that he or she scored poorly on in the exam. A score of 75% or above is a "full pass" and no further study is required, although feedback is still provided on performance. Examiners are provided with a general schedule and outline of what will occur during the case study. A panel of three raters evaluates the Examiner during their case study, and they must come to a consensus on their ratings. During our informational interviews with stakeholders, we learned that raters undergo a two-day training during which they are trained on rating fundamentals and rating the case study in particular. The three raters must come to a consensus on their ratings. In addition, a fourth person (an independent external consultant) attends the case study to monitor the raters' performance for quality control purposes. It is important to note, however, that specific information on the rater training curriculum was not provided to our team for analysis.

Development. Other federal agencies have recognized the intrinsic benefit of utilizing Individual Development Plans (IDPs), understanding that all agencies benefit from "having a competent and motivated workforce, capable of 're-tooling' itself to meet the demands placed on it by constant organizational and technological changes" (U.S. Department of Commerce, n.d.). The IDP process emphasizes collaborative decision-making by the employee and the supervisor regarding developmental and training experiences that will support both the employee's career development and organizational needs (U.S. Department of Commerce, n.d.). IDPs are crucial tools for employee development, as they serve as evidence of managerial commitment to their employees' development as well as a roadmap for individual advancement and progression. As an EEOC working group reports, IDPs not only create a general roadmap for advancement, but they provide a structured opportunity for supervisors to "specifically inquire into whether employees are interested in management and higher level positions" (EEOC, 2013b.). Requiring these conversations between supervisors and employees (especially those groups identified in the

trigger report) through the medium of an IDP allows for clarity, transparency, and higher levels of support for career advancement.

The documents reviewed indicate that [(b)(5)]

[(b)(5)]

[(b)(5)] However, it is explicitly stated that IDPs are not mandatory, not related to performance planning, and not an official agreement; rather, they are designed to encourage meaningful review and reflection and create a plan of action. Because IDPs are not required to be kept on file, [(b)(5)]

[(b)(5)]

Internal resources available to employees include web-based training, team member training courses, and leadership training courses. There are also supports in place to assist managers in having successful developmental conversations and develop challenging assignments. In addition, several documents noted that customized development tools have been created for Examiners. [(b)(5)]

[(b)(5)]

Management. We reviewed several policies and resources related to management and manager training. It is important to note that [(b)(5)]

[(b)(5)]

[(b)(5)] In addition, the New Manager Onboarding Support Tool includes descriptions of responsibilities related to diversity and inclusion, EEO, employee development and career planning. This tool highlights leaders' role in embracing and promoting a diverse and inclusive workforce.

New supervisors are also required to attend a BCFP Supervisor Development Seminar (SDS). Other general resources for both new and seasoned supervisors include a New Employee Portal, an EEO Supervisor Handbook, entries in the Manager Minute (published via e-mail), and Manager and Employee all-hands conference calls. All new supervisors must also attend a mandatory two-day EEOC-led training on EEO, as well as a separate mandatory two-day Diversity and Inclusion training.

Mentoring. OMWI launched a mentoring bank in June 2017 that was made available to employees from two divisions. Although mentees were drawn from only two divisions, mentors from across the Bureau were allowed to participate. The goal of the program was "to actively support the diversity and inclusion goals of the BCFP by identifying and implementing

professional development and networking opportunities to ensure the continued learning and advancement of all employees at the Bureau." (b)(5)

(b)(5)

Several documents outline the training made available to mentors and mentees, including statements regarding the importance of mentoring and best practices for mentors/mentees. There was also a mentoring evaluation form. (b)(5)

(b)(5)

III.D.2. Interviews and focus groups

Information was gathered through IDIs and focus groups in a number of topical areas related to promotion, namely:

1. Career paths and advancement
2. Mentoring
3. Executive coaching
4. Training and development

III.D.2.i. Future career paths/advancement.

Personnel involved with selection. (b)(5)

(b)(5)

(b)(5)

(b)(5)

(b)(5)

Executives. (b)(5)

(b)(5)

(b)(5)

(b)(5)

African American/Black employee focus groups.

(b)(5)

Hispanic/Latino(a) employees. (b)(5)

(b)(5)
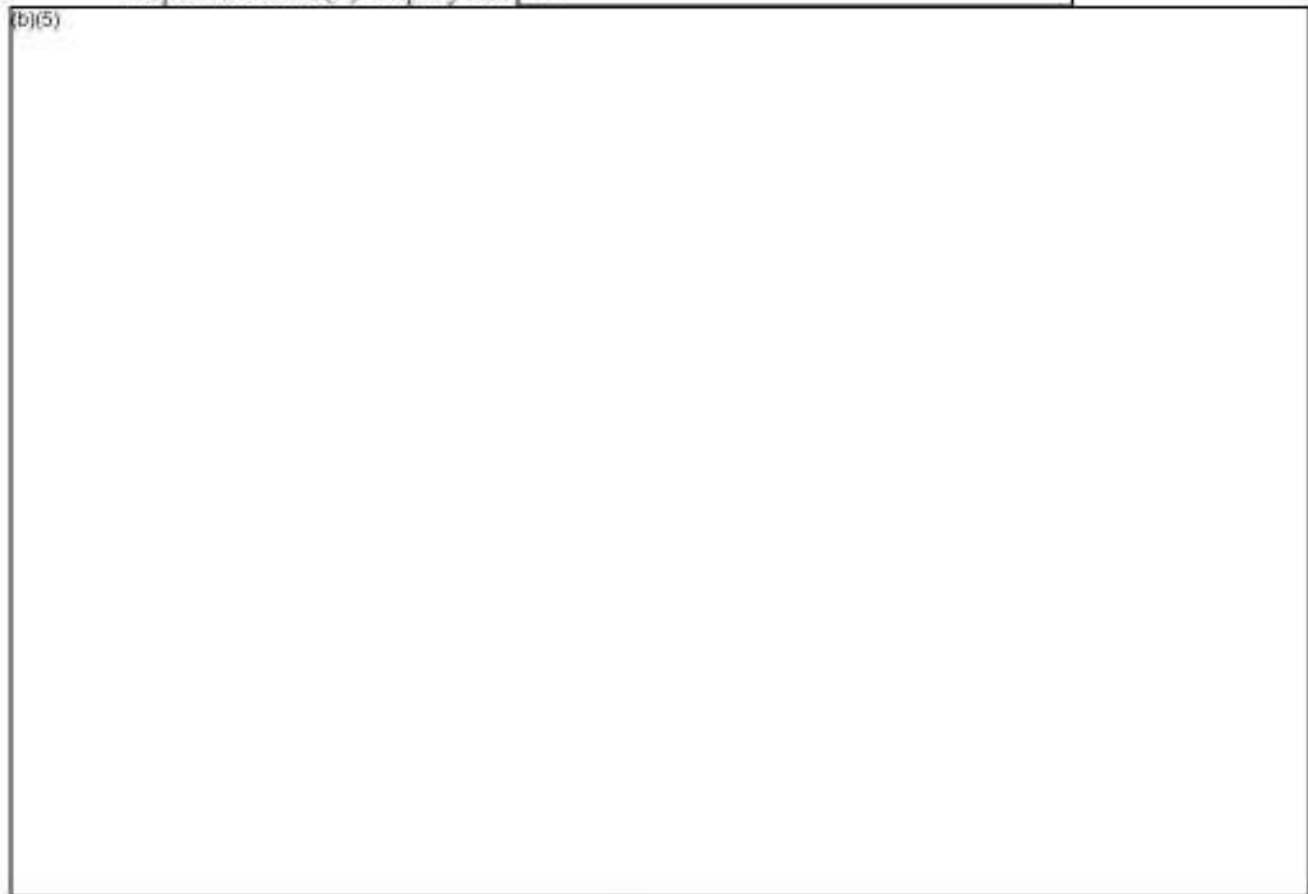
(b)(5)

III.D.2.ii. Mentoring

Personnel involved with selection. (b)(5)

(b)(5)

(b)(5)

Executives. (b)(5)

(b)(5)

African American/Black employee focus groups. (b)(5)

(b)(5)

(b)(5)

Hispanic/Latino(a) employee focus groups. (b)(5)

(b)(5)

(b)(5)

Examiner focus groups. (b)(5)

(b)(5)

(b)(5)

III.D.2.iii. Training and development.

Personnel involved with selection. (b)(5)

(b)(5)

(b)(5)

Executives. (b)(5)

(b)(5)

(b)(5)

African American/Black employee focus groups. (b)(5)

(b)(5)

(b)(5)

Hispanic/Latino(a) employee focus groups. (b)(5)

(b)(5)

(b)(5)

Examiner focus groups. (b)(5)

(b)(5)

)

(b)(5)

III.D.3. Discussion and recommendations

We reviewed documents pertaining to performance management, recognition and awards, training, development, management, and mentoring and found general practices that (b)(5)

(b)(5)

(b)(5) The BCFP promotion policy states that evaluation processes may include a review and rating by a panel of SMEs. We did not review any information about how members of these panels are selected or trained.

(b)(5)

We reviewed employee attitudes regarding promotion from the AES results. The 2017 AES results (b)(5)

(b)(5)

(b)(5)

Also in the 2017 AES, approximately two-fifths (41%) of employees reported being satisfied or very satisfied with their opportunity to get a better job at BCFP.[12] (b)(5)

(b)(5)

(b)(5)

(b)(5) Holding employees and leaders accountable for supporting diversity and inclusion shows the organization's commitment to inclusion and is aligned with best practices (Kalev, Dobbin, & Kelly, 2006; Lindsey et al., 2013). (b)(5)

(b)(5)

(b)(5)

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[12] The 2017 AES data were collected prior to the hiring freeze.

(b)(5)

(b)(5)

In response to Bureau employees' desire for professional development guidance, OMWI responded by developing a mentoring bank. We understand that the mentoring bank is currently inactive and there are no current plans as to when the program will be available again. (b)(5)

(b)(5)

(b)(5)

Currently there is no Senior Executive Service Candidate Development Program (SESCDP) at BCFP, as all Executive positions are regular competitive promotion opportunities. SESCDPs develop the Executive credentials of high-performing leaders to qualify them for an initial career appointment to the SES.

Although each agency's CDP may be tailored to meet its organizational mission and succession planning needs, each program must include the following elements in order to be approved by OPM:

1. A development plan that addresses the Executive Core Qualifications (ECQs), a candidate's individual needs, and is approved by the agency's Executive Review Board (ERB).
2. At least 80 hours of formal interagency training that addresses the ECQs and includes senior employees outside the candidate's agency.
3. A developmental assignment with Executive-level responsibility of at least 120 days, including at least one assignment of 90 continuous days in a position substantially different from the candidate's position of record.
4. A mentor who is a member of the SES.

As noted by McKinsey and Company (2016), however, CDPs are most effective in agencies that have established a strong succession management process. When not paired with succession planning, "agencies risk accepting and graduating individuals without the skills that correspond to the agency's future needs—that is, building a bench, but building the wrong bench" (McKinsey & Company, 2016, p. 13). Further, as Greer and Virick (2008) note, linking diversity management with succession planning results in "more robust succession plans…and thus provide a strategic focus for the development of a diverse workforce" (p. 352). Currently, we are unaware that any formal succession plan or planning exists at BCFP. Career maps can help employees think strategically about their career paths within the organization and help organizations develop and retain talented employees (SHRM, 2015). Federal agencies such as Veterans Affairs (VA) and United States Department of Agriculture (USDA), have implemented career maps for their employees.

BCFP deems IDPs optional and does not require that they are kept on file. As discussed above, IDPs provide a structure within which employee and supervisor can have collaborative discussions about professional development and career advancement, ensuring that both parties not only understand expectations but are also provided with a clear path forward.

(b)(5)

(b)(5)   Researchers have found that individuals who are motivated not to appear racist tend to withhold critical feedback to minority individuals (termed the "feedback withholding bias"; Croft & Schmader, 2012). Limited laboratory research suggests that accountability may be one method to encourage people to provide honest feedback to minority individuals (Ruscher, Wallace, Walker, & Bell, 2010). (b)(5)

(b)(5)

(b)(5)

With respect to Examiner commissioning, specifically, (b)(5)

(b)(5)

In addition, it is important to demonstrate that the assessment predicts job performance above and beyond employee performance in the ECP. That is, it is possible that the assessments possess criterion-related validity, yet fail to provide meaningful additional information above and beyond what is already gained from examining employee performance in the program. This might happen if the aspects of job performance predicted by assessment scores completely overlap with those aspects of job performance predicted by past employee performance in the program. Under this scenario, assessment scores would not provide any additional predictive value. However, if there is little overlap between aspects of job performance predicted by the Examiner assessments and employee performance in the Examiner Commissioner Program, then the assessments could provide *incremental predictive validity*. This means that the assessments provide unique predictive information about job performance that is otherwise unaccounted for. Statistical methods can be used to estimate the incremental predictive validity of assessment scores if they are examined alongside performance in the program to predict Examiner job performance.

Table 16. Summary of Promotion-Related Recommendations

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

III.E. Separation/Retention

III.E.1. Document review

We reviewed six documents in order better understand BCFP's policies and processes related to separation. These were: the Exit Survey instrument, the Exit Survey data tables from 2012-2017, the off-boarding policy, Table A-14 from the BCFP FY 2017 MD-715 Tables, and documents related to handling of employee complaints, disputes, and disciplinary actions. Table A-14 from the BCFP FY 2017 MD-715 Tables provides details regarding the number of separations (involuntary and voluntary) by race/ethnicity and gender.

According to Table A-14, there were no involuntary separations and 112 voluntary separations in FY 2017 in the permanent workforce. Of those who separated from BCFP in FY 2017, 4.46% were Hispanic males. This percentage was slightly higher than the percentage of Hispanic/Latino males in the overall Bureau workforce (3.34%). The percentages of Hispanic/Latina females, African American/Black males, and African American/Black females who separated were below the percentages of their representation in the overall workforce at BCFP (representation in the Bureau: 2.95%, 8.03%, and 13.94%, respectively).

The Exit Survey data tables (June 2012-September 2017) provide responses by gender, race, ethnicity, supervisory status, grade, and tenure. Data were only reported for groups that had 10 or more respondents. Given this restriction, we were only able to view responses for one group of interest: African American/Black females (non-supervisors and those with tenure of 1-3 years). In addition, there were low response rates for some questions. We did not review any items in which the base n was less than 10. We also acknowledge that not all employees separating from BCFP chose to complete the exit survey and the individuals who chose to complete the survey may have had different experiences than those who chose not to complete the survey. In addition, we note that the data were combined from June 2012-September 2017 so it possible that there were changes over time that we are not able to identify based on the data we have. Based on the people who responded to each question, we attempted to identify patterns in responses from the following groups: African American/Black female non-supervisors, White male non-supervisors, and White female non-supervisors. Data were also available for White male and female team leaders and "all other race" non-supervisors.

(b)(5)

III.E.2. Interviews and focus groups

III.E.2.i. IDIs.

Personnel involved with selection. (b)(5)

(b)(5)

Executives. (b)(5)

(b)(5)

(b)(5)

III.E.2.ii. Focus groups.

African American/Black employees. (b)(5)

(b)(5)

(b)(5)

Hispanic/Latino(a) employees. (b)(5)

(b)(5)

Examiners. (b)(5)

(b)(5)

(b)(5)

III.E.3. Discussion and recommendations

Due to small sub-sample sizes and the voluntary nature of the exit interview survey, it is difficult to draw firm conclusions from the exit survey data. (b)(5)

(b)(5)

III.F. Complaints, Grievances, and Disciplinary Action

III.F.1. Document review

BCFP provides training and information to supervisors regarding disciplinary actions, alternative dispute resolution, retaliation, and the complaint process. (b)(5)

(b)(5)

(b)(5)

Table 17. Cited Bases of Discrimination in Formal Complaints (FY 2016 and FY 2017)

Basis of Complaint	FY 2016	FY 2017
Reprisal	13	3
Sex	*10*	*2*
Race	*8*	*2*
Color	*6*	*1*
Equal Pay Act	5	0

---

[13] There can be more than one basis of discrimination per complaint.

Disability	4	0
Age	4	4
Pregnancy	2	0
National Origin	*0*	*1*

(b)(5)

In terms of how disciplinary actions are determined, the *Disciplinary and Adverse Action Policy* (Wiki page) states that although there is no table of penalties to use when determining disciplinary action, consistency will be ensured when imposing penalties; however, there is no further guidance provided as to how to ensure this consistency. The policy states that penalty selection may differ according to various factors (e.g., nature and seriousness of the offense, past disciplinary record).

III.F.2. Interviews and focus groups
Complaints, grievances, and disciplinary actions were examined primarily through the document review and not specifically targeted for exploration in the IDIs and focus groups. (b)(5)

(b)(5)

III.F.3. Discussion and recommendations
BCFP demonstrates multiple strengths in this area. The Bureau provides comprehensive information and training for supervisors regarding disputes, complaints, and disciplinary actions. It also offers ongoing webinars and presentations related to EEO best practices, has implemented a more efficient complaint processing program, and has seen a reduction in the number of discrimination claims between FY 2016 and FY 2017. Participants did not describe any specific areas that OCR or OEOS could improve upon.

(b)(5)

[14] (b)(5)

BCFP policy states that consistency will be ensured when imposing penalties; [(b)(5)]

[(b)(5)]

[(b)(5)]

[(b)(5)]

Table 18. Summary of Recommendations Regarding Complaints, Grievances, and Disciplinary Action

Recommendation	Source	Priority Level
[(b)(5)]		

III.G. Diversity, Inclusion, and Workplace Environment and Climate

III.G.1. Document review

We reviewed 27 documents related to diversity and inclusion training, policies, benefits, and employees perceptions of diversity and inclusion at the Bureau. [(b)(5)]

[(b)(5)]

[(b)(5)] CFP offers a wide range of diversity and inclusion training including required two-hour diversity training for all employees and two-day training for all supervisors. We reviewed training evaluations from the two-day EEOC

training for supervisors. [b)(5)

[b)(5)

In addition to the two required diversity and inclusion related trainings, BCFP recognizes the impact unconscious bias can impact hiring, promotion, and retention, and offers training on this topic. It also appears that BCFP offered "listening sessions" in 2014.

As of the time of the research conducted for this report, there were three Employee Resource Groups (RISE, Adelante, and Pride). RISE is a African American/Black employee-focused group and Adelante is a Hispanic/Latino(a) employee focused group. There appears to be support and tools for creating ERGs (including an application and Charter Bylaw template). In addition, OMWI assists with securing an Executive Sponsor for the ERG. BCFP also has a Diversity and Inclusion Employee Council (DICE), and their objectives are focused on initiatives and activities that support OMWI's priorities, such as supporting recruitment and retention efforts of underrepresented groups, increasing awareness of mentorship opportunities, and engaging employees to generate ideas on how to address inclusion-related challenges. [b)(5)

[b)(5)

[b)(5)   . BCFP also offers several benefits to support work-life balance, including emergency back-up care, lactation rooms, alternative work schedules, flexible schedules, and telework.

Employee attitudes. We reviewed the data tables for the AES (2012-2017) and the 2017 AES Report to gather insight into employees' perceptions of diversity and inclusion at the Bureau. [b)(5)

[b)(5)

[b)(5)   Overall in 2017, the inclusion quotient (composite of 20 items regarding inclusion) was higher (72.5%) than the government-wide average (59.9%). In addition, the "Best places to work index" was higher (77.6%) than the government-wide average (64.7%). The 2017 report also provided scores on the inclusion quotient by race/ethnicity and gender. The inclusion quotient was 4.7% lower among African American/Black employees than White employees. It was fairly similar among Hispanic/Latino(a) and White employees (1.5% lower among Hispanic/Latino(a) employees compared to White employees). [b)(5)

[b)(5)

The 2012-2017 data tables provided average inclusion quotients by race/ethnicity[15] and gender, as well as their associated standard deviations and sample sizes. We conducted significance tests

(b)(5)

A variety of items in this survey asked about diversity and inclusion in the workplace. Results

(b)(5)

Finally, an item asking about employees' agreement with the following statement ("Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated" showed differences (b)(5)

(b)(5)

Workplace environment and climate are important contributors to and indicators of equal opportunity but are difficult to assess through the review of documentation. Indicators of climate have been discussed throughout this report where relevant. Some of the most direct measures available (e.g., the AES results reported above) (b)(5)

(b)(5)

(b)(5) However, the IDIs and focus groups provided the opportunity to gauge the current environment and climate as perceived by the participants. The results of these discussions are presented in the next section.

III.G.2. Interviews and focus groups

III.G.2.i. Perceptions of diversity and inclusion

Personnel involved with selection. (b)(5)

(b)(5)

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[15] The data were presented as Ethnicity (Hispanic/Non-Hispanic) by Gender and Race by Gender. The race by gender data were not exclusively non-Hispanic individuals, so there could be some individuals included in these categories (White, Black) who are also Hispanic.

Executives. (b)(5)

African American/Black employee focus groups. (b)(5)

(b)(5)

Hispanic/Latino(a) employee focus groups. (b)(5)

(b)(5)

Examiners. (b)(5)

(b)(5)

(b)(5)

III.G.2.ii. Workplace environment and climate

Personnel involved with selection. (b)(5)

(b)(5)

Executives. (b)(5)

(b)(5)

African American/Black employee focus groups. (b)(5)

(b)(5)

(b)(5)

Hispanic/Latino(a) employee focus groups. (b)(5)

(b)(5)

(b)(5)

Examiners. (b)(5)

(b)(5)

III.G.3. Discussion and recommendations

BCFP offers a variety of diversity and inclusion-related training. In particular, BCFP has recognized the role of unconscious bias in areas such as hiring and promotion and has sought to reduce unconscious bias through training. However, we were unable to determine how many individuals participated in the unconscious bias training and the exact content of this training.

Based on the description reviewed, (b)(5)

(b)(5)

Moreover, research shows that it is often the employees who already care about diversity that are most likely to participate in voluntary diversity-related training (e.g., Kulik, Pepper, Roberson, & Parker, 2007).

(b)(5)

(b)(5)

(b)(5) However, research has shown that administering diversity training over a span of time is more effective, as it provides multiple opportunities for skill development (Bezrukova et al., 2016).

(b)(5)

Diversity training is most effective when paired with other inclusive policies or practices, such as an inclusive culture or visible support from leadership (Bezrukova et al., 2016). (b)(5)

(b)(5)

Table 19. Summary of Recommendations Regarding Diversity and Inclusion

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

IV. Summary and Conclusions

(b)(5)

(b)(5)

We have developed 53 recommendations to address the above barriers and further enhance diversity and inclusion at the Bureau, more generally. These are presented throughout this report and also aggregated in Appendix J.

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Appendix A
Triggers Identified

Trigger	Population
1. Bureau-wide participation	Hispanic/Latino(a) males and females
2. Bureau-wide selection	Hispanic/Latino(a) males and females
3. Bureau-wide separation	Hispanic/Latino(a) males and females
4. Permanent workforce participation in the Attorney occupation	Hispanic/Latino males
5. Permanent workforce participation in the Economist, Examiner, and Miscellaneous Administration and Program occupations	Hispanic/Latina females
6. Executive participation	Hispanic/Latina females
7. Applicant flow between the Applied and Qualified stages for internal selections at the CN-53 through Executive level	Hispanic/Latina females
8. Attorney hiring with complete data	Hispanic/Latino(a) applicants/ employees
9. Applicant flow between the Voluntarily Identified and Qualified stages of the Economist occupation	African American/ Black males
10. Applicant flow between the Qualified and Selected stages in the Miscellaneous Administration and Program occupation	African American/ Black males
11. Promotions from the CN-53 to CN-60 level Bureau-wide	African American/ Black males
12. Applicant flow between the Applied and Qualified stages for internal selections at the CN-53 to Executive levels	African American/ Black males
13. Executive participation	African American/ Black males and females
14. Permanent workforce participation in the Economist occupation	African American/ Black females
15. Applicant flow between the Applied and Qualified and Qualified and Selected stages in the Economist occupation	African American/ Black females
16. Applicant flow between the Applied and Qualified stages in the Examiner occupation	African American/ Black females
17. Promotions from the CN-60 to CN-71 level and CN-71 to Executive level Bureau wide	African American /Black females
18. Promotions from the CN-71 to Executive level within the Miscellaneous Administration and Program occupation	African American/ Black females
19. Promotions from the CN-52 to CN-53 level in the Examiner occupation	African American/ Black females.
20. Attorney hiring with complete data	African American/Black

	applicants/employees

Appendix B

Responses from Q1 on the New Employee Survey based on data from 2011-2017 (How did you find out about this job?) on New Employee Survey

	External sites	BCFP.gov/jobs	BCFP employee referral	USA Jobs	University job board/career center/faculty outreach	Recruitment/ Outreach event	Contacted by a recruiter	Other
White Male NS	34.4%	16.7%	15.1%	9.4%	0.5%	2.1%	0.0%	21.9%
White Female NS	32.0%	6.1%	21.1%	15.6%	0.7%	3.4%	0.7%	20.4%
Black Male NS	52.2%	13.0%	8.7%	13.0%	0.0%	0.0%	0.0%	13.0%
Black Female NS	42.6%	4.4%	16.2%	22.1%	0.0%	1.5%	0.0%	13.2%
Hispanic Male NS	27.3%	13.6%	22.7%	9.1%	0.0%	4.5%	0.0%	22.7%
Hispanic Female NS	47.8%	4.3%	17.4%	21.7%	0.0%	4.3%	0.0%	4.3%
White Male S	15.4%	0.0%	30.8%	15.4%	0.0%	0.0%	0.0%	38.5%
White Male TL	25.0%	8.3%	25.0%	8.3%	0.0%	0.0%	0.0%	33.3%
White Male Manager	7.7%	0.0%	30.8%	7.7%	0.0%	0.0%	0.0%	53.8%
White Female TL	25.0%	0.0%	37.5%	25.0%	0.0%	0.0%	0.0%	12.5%
White Female S	27.3%	0.0%	45.5%	0.0%	0.0%	0.0%	0.0%	27.3%

Note. S= Supervisor, TL = Team Leader, NS = Non-Supervisor

Appendix C
Table of Documents Reviewed

Name	Topic Area	Description
1. Description of Benefits	Benefits	Describes employee benefits such as health insurance, life insurance, disability insurance, and other benefits (e.g., FSA, transit subsidy).
2. Telework article	Benefits	Description of telework, requirements of telework, and employee responsibilities.
3. Telework program policy	Benefits	Description of types of telework program, policy, and procedures.
4. Telework Agreement	Benefits	Telework agreement form that includes areas to specify the type of telework request, reason, and nature of work performed at alternative site.
5. Work Life Programs	Benefits	Description of flexible work schedules, holiday/overtime/other premium pay, leave options, nursing mother resources, work/life services program, emergency back-up care, and employee assistance program.
6. WorkLife 4 You	Benefits	Description of WorkLife 4 You benefit which is designed to help employees manage work and life responsibilities including personalized referrals, confidential counseling, tools to get healthier, and educational materials and interactive tools.
7. Premium Service - Backup Care	Benefits	Description of back up care connection benefit that includes assistance with scheduling back up care for care of children or older adults.
8. How to Request an External Detail	Details	Wiki page that describes how to request an external detail. Contains links to necessary forms.
9. How to Request an Internal Detail	Details	Wiki page that describes how to request an internal detail based on whether the detail lasts 30 or 31-120 days.
10. Internal Detail Focus Group Report	Details	Report on a series of focus groups that were conducted regarding the detail experience.
11. Detail and Temporary Promotion Opportunities	Details	Overview of the detail process including how to post a detail, how to apply, how to find opportunities, and other FAQs.
12. Detail Opportunities	Details	Frequently Asked Questions about the detail process for detailees and

Name	Topic Area	Description
Process FAQs		managers.
13. Rotation Opportunities: National Consumer Reporting Team	Details	Provides information about rotational opportunities on the National Consumer Reporting Team (18 month rotations). Open to all Examiners at CN 51-CN60 levels.
14. Internal Details Posting Process	Details	SOP outlining how internal details should be posted for details lasting 31-120 days.
15. Individual Development Planning Workshop	Development	Workshop explaining what individual development plan is and the steps involved in the plan. It discusses reflecting on how an individual has performed in relation to previous goals, refining by identifying areas that could use further development, and realizing by initiating in these training activities.
16. Career Planning Awareness Workshop	Development	Introduction to the steps involved in the career planning framework, providing resources to assist individuals along this path. The path consists of four steps, self-asses, explore, prioritize, and act.
17. Individual Development Plans	Development	Provides information about Individual Development Plans including links to manager resources.
18. Guidebook: Individual Development Planning	Development	Guide for both employees and supervisors to help analyze career goals and objectives, learn how to develop an Individual Development Plan, assess the organization's need in relation to the IDP, prepare for the employee-supervisor IDP discussion, and determine the best resources for individual development planning.
19. Developmental Activities: Preparing Individual Development Plans	Development	Guide for employees as they are preparing their individual development plans. Describes potential developmental activities.
20. IDP Employee Checklist	Development	Employee checklist for preparing their individual development plans including a list of considerations for each step: pre-discussion (identification of personal/organizational goals, objectives, and developmental activities), discussion, and post-discussion.
21. IDP Supervisor Checklist	Development	Supervisor checklist for preparing individual development plans including a list of considerations for each step of the process: analysis of organizational needs, reviewing the IDP, pre-discussion, discussion, and post-discussion.

Name	Topic Area	Description
22. Manager Tips for Successful Developmental Conversations	Development	Provides tips for managers to have productive developmental conversations (e.g., identifying individual needs, making decisions about development, encouraging self-expectations).
23. Examiner Development Coaching Tool	Development	Sample coaching/development worksheet for Examiners. Includes space for Examiner to assess themselves in each of the Examination Tasks and Modules (technical knowledge, analyzing information, oral communication, interpersonal manner, serving as a mentor/assisting others, and other duties as assigned) and a space for positive and/or constructive feedback from coach.
24. Examiner Development Toolkit Instructions	Development	Description of steps an Examiner should follow to develop IDP including self-assessment, drafting IDP, finalize IDP, executing plan, revise plan.
25. Examiner IDP Example	Development	Customized IDP template for Examiners. Section on development goals include spaces to enter dimension/competency, targeted knowledge/skill, learning activity description, resources needed, timeframe, and reflection.
26. Self-assessment Tool Pay Band 40 Examiner Sample	Development	Self-assessment tool for Examiners to compare themselves against Examiner dimensions, competencies, tasks, and knowledge areas.
27. No FEAR Act Annual Report	Disputes/complaints/disciplinary action	Document outlining what the No FEAR act is, gives analysis for the previous year's EEO complaints, and discusses the extend of the No FEAR act training in the fiscal year.
28. Overview of the Federal EEO Complaint Process	Disputes/complaints/disciplinary action	Training providing an overview of the steps when an EEO complaint is filed.
29. List of Grievances Filed	Disputes/complaints/disciplinary action	List of all of the grievances filed from 2014-present including the date of grievance, current EEO activity, type of grievance, and any notes.
30. Disciplinary and Adverse Action Policy	Disputes/complaints/disciplinary action	Policy discussing how adverse action is handled within CFBP (Office of Human Capital, Legal Division, Supervisors, and Employees) along with an outline of steps taken in accordance with the severity of the adverse action.
31. ADR Participation	Disputes/complaints/disciplinary	Rates of individuals going through Alternative Dispute Resolution

Name	Topic Area	Description
Settlement Rates	action	and the rate of success of ADR
32. Alternative Dispute Resolution	Disputes/complaints/disciplinary action	Presentation explaining what ADR is, why it is beneficial, and the steps involved.
33. Alternative Dispute Resolution	Disputes/complaints/disciplinary action	Presentation explaining what ADR is, why it is beneficial, and the steps involved.
34. Workplace Harassment	Disputes/complaints/disciplinary action	Presentation discussing what workplace harassment is, what legal protections exist for workplace harassment, how it affects the workplace, and preventative actions that can be taken.
35. Preventing Retaliation	Disputes/complaints/disciplinary action	Presentation discussing what can cause retaliation, how it should be addressed, and what actions are protected under law.
36. Annual Federal EEO Statistical Report of Discrimination Complaints	Diversity	EEO discrimination complaints data outlining pre-complaint activities, formal complaint activities, and agency resources. It also shows base issues in relation to bases of discrimination, issues alleged in complaints filed, issues alleged in settlements, and issues found in fad's and final orders.
37. EEO Policy Wiki Page	Diversity	Policy explaining how EEO rights are protected, information on how complaints are handled, and what activities are expected of certain individuals within CFBP.
38. Office of Minority and Women Inclusion Annual Report to Congress	Diversity	Provides current statistics about diversity in the current workforce, new hires, separations, and promotions.
39. Office of Minority and Women Inclusion (OMWI) Wiki page	Diversity	Description of diversity and inclusion at BCFP, initiative and programs, and upcoming events.
40. Employee Resource Group Policy and Operational Procedure	Diversity	Overview of purpose, policy, and procedures associated with Employee Resource Groups.
41. ERG Application	Diversity	Application to start an Employee Resource Group. Includes space to describe purpose, mission, and provide signatures of 10 members who will join.
42. ERG Wiki-Page	Diversity	Employee Resource Group Wiki page with information and FAQs as well as links to other pages with more information.

Name	Topic Area	Description
43. Sample Employee Association Charter and Bylaws	Diversity	Sample of a charter and bylaws for an employee association at BCFP.
44. Employee Resource Group Toolkit	Diversity	Description of how steps to form an ERG, set missions and goals, develop budget and funding plan, begin implementation, etc.
45. Diversity and Inclusion Council of Employees - Wiki Page	Diversity	Description of Diversity and Inclusion Counsel of Employees' initiatives and activities on a Wiki page.
46. DICE Charter	Diversity	Diversity and Inclusion Council of Employees charters that includes objectives and scope, roles and responsibilities, governance and structure, partners and stakeholders.
47. Rehabilitation Act and Amendments	Diversity	Presentation discussing reasonable accommodations for individuals with disabilities and how to best communicate and integrate these individuals into the workplace.
48. OMWI Listening Sessions	Diversity	Description of listening sessions that OMWI conducted regarding concerns about diversity and equality.
49. African American History Month Presentation	Diversity	Presentation including information related to Black life, history, and culture.
50. The Business Case for Diversity and Inclusion at the BCFP	Diversity	A description of the benefits of diversity and inclusion for BCFP including greater creativity, problem solving, and potentially increased productivity.
51. FEORP Report to Congress (FY 2016)	Diversity	Report on representation of minority groups within the workforce.
52. EEO program status report for FY2017 (MD-17 Annual Report)	Diversity	Includes information about EEO policies and procedures and diversity statistics in the current workforce, new hires, separations, and promotions.
53. Subtle behaviors: Unconscious Bias (course description)	Diversity	Description of a course to increase awareness of unconscious biases, how they manifest in the workplace, and how to move beyond them.

Name	Topic Area	Description
54. Overview of the EEO Laws	Diversity	Training breaking down the different EEO laws (Title VII, ADEA, Rehabilitation Act, GINA, Equal Pay Act). Also provides scenarios in where these laws are enacted or broken.
55. Diversity and Inclusion Council of Employees Champion Training Description	Diversity	Description of Diversity and Inclusion Council of Employees - Champion training that covers how to act as a change agent and model inclusive behaviors. Includes a supportive forum to discuss diversity and inclusion challenges and opportunities.
56. Diversity and Inclusion Awareness Training Description	Diversity	Description of Diversity and Inclusion Awareness training workshop that focuses on awareness of the significance of diversity and inclusion to the Bureau's mission and increasing understanding of how to interact effectively in a diverse and inclusive workplace.
57. Overcoming Unconscious Bias in Awards and Recognition	Diversity	Describes potential ways that unconscious bias can impact the way that managers distribute awards and recognition.
58. FEORP Progress Tracker	Diversity	Survey to see what initiatives BCFP has taken with specific actions outlined in the FEORP
59. HR Technical Knowledge Power Point	Diversity	Supervisor training that discusses MSP and PPP, along with explaining the supervisory role when it comes to EEO, identifying key personnel in recruitment and hiring processes, and breaking down scheduling when it comes to leave, overtime, and different types of work schedules.
60. Overview BCFP Supervisor Development Seminar	Diversity	Overview of the seminar that includes information for supervisors on HR technical knowledge, performance management, and addressing conduct issues.
61. BCFP Employment Civil Rights Training for Managers and Supervisors	Diversity	Two day training information for Employment Civil Rights Training. Discusses history and overview of EEO Laws, overview of EEO complaint process, and ADR. Also discusses management's responsibilities regarding EEO, preventing retaliation, rehabilitation act, and workplace harassment.
62. EEO & Effective Leadership	Diversity	Presentation outlining EEO practices and tools, along with training discussing what managers can do to prevent EEO complaints.
63. 2017 BCFP Annual	Employee Attitudes	Results from the Annual Employment Survey. This survey looks at leadership and knowledge management, results oriented performance

Name	Topic Area	Description
Employee Survey - Bureau-wide Survey Report e-mail		culture, talent management, and job satisfaction. Results are broken out by demographic, coding of open ended questions, benchmark comparisons, engagement, diversity, and Best Places to Work index.
64. 2017 Annual Employee Survey (AES) Results	Employee Attitudes	Email discussing how many people took the Annual Employee Survey and their ranking within mid-size agencies, along with a document discussing the survey further.
65. Data tables for Annual Employee Survey (2012-2017)	Employee Attitudes	Data tables for selected questions from the Annual Employee Survey by gender, race, ethnicity, supervisory status, grade, and expected tenure (data from 2012-2017).
66. Applicant Flow Analysis	Hiring	Presentation discussing the issue of African American applicants falling out of the federal hiring process. Focuses on where in the process fall out is most prevalent, whether that be by selection or applicants who self-select out. Also discusses recommendations to help improve retention rates of African American applicants, the rationale behind these recommendations, and the timeframe/level of occupational impact on the organization.
67. Analyses of BCFP Hiring Data	Hiring	Data outlining hiring data from 2011-2014, specifically focusing on the differences between races/ethnicities through the hiring process. This data is broken down into job group, year, self-selecting out, hiring manager interview process, and applicant referral.
68. BCFP FY2017 MD-715 Tables	Hiring/Promotion/Separation	Tables from FY2017 showing hiring, promotion, and separation by gender and race/ethnicity.
69. Hiring Manager Diversity Training	Hiring	Presentation introducing hiring managers to diversity and inclusion, discussing why diversity is important, establishing that unconscious biases exist, and how to navigate those biases in the hiring process.
70. The Impact of Unconscious Bias on Interviewing - Wiki Page	Hiring	Description of the impact of unconscious bias on interviewing including stereotyping, "like me" bias, and "halo effect" bias.
71. Interviewer Biases	Hiring	Provides information about interview biases including leniency/severity, halo/horns, stereotyping, central tendency, contrast, similarity, first impression, negative emphasis, and inconsistency in standards.
72. Hiring Manager's	Hiring	Document that provides resources to hiring managers regarding the

Name	Topic Area	Description
Guide		hiring process (Hiring Conversation, Develop a Position Description, Define the Assessment Method, Develop a Vacancy Announcement, Qualification Determination and Referral, Interview & Selection, Job Offer, and Enter on Duty), along with legal policy and merit principles hiring managers are expected to uphold.
73. Executive Core Qualifications	Hiring	A guide identifying and expanding on the five Executive core qualifications for SES. The guide also discusses the different selection methods that can be used to select applicants, focusing on resume and narrative writing that addresses some of the core qualifications. The guide gives examples of good narratives and resumes and discusses why they are good.
74. Final Recommendations for Hiring Analyses and Next Steps	Hiring	Outlines four identified issues within the hiring process and give short term and long term recommendation on how to remedy these issues.
75. Follow-Up Hiring Analyses and Next Steps	Hiring	Presentation outlining data previously found in 2011-2014 regarding diversity issues in the hiring process.
76. Human Resource Management Staff Resources	Hiring	Resource providing contacts and additional information for different human resource areas (personnel practices, EEO, diversity and inclusion, staffing, recruitment, performance management and recognition, learning and development, benefits, labor and employee relations, and human resource specialists).
77. New Employee Survey Data Tables (2011-2017)	Hiring	Data tables for all of the items on the New Employee Survey (2011-2017) by gender, race, ethnicity, pay grade, supervisory status, and tenure.
78. SME Review of Minimum Qualifications	Hiring	Guide for hiring managers and SMEs to use when reviewing job applicants. This process beings with OHC HR preparing documents of eligible applicants for a blind review by SMEs, and the SMEs review applicants to see if they meet the minimum qualifications for the job.
79. Structured Interview Booklet Template	Hiring	Template of a structured interview booklet that includes instructions for the individuals conducting the interview and an overview of the three parts of the structured interview (opening statement, structured

Name	Topic Area	Description
		questions, additional questions).
80. Structured Interview Training Guide	Hiring	Guide to discussing how interviewers conduct structured interviews, focusing specifically on the preparation of competencies, questions that are permissible and not permissible to ask, how to evaluate the interview, and exposure to interviewing biases.
81. Structured Interview Training Slides	Hiring	Presentation discussing how interviewers conduct structured interviews, focusing specifically on the preparation of competencies, questions that are permissible and not permissible to ask, how to evaluate the interview, and exposure to interviewing biases.
82. Structured Interviews - Wiki Page	Hiring	Provides information about conducting structured interviews including how to support diversity and inclusion while conducting the interview process.
83. HR Technical Knowledge Participation Guide	Hiring	Supervisor training that discusses MSP and PPP, along with explaining the supervisory role when it comes to EEO, identifying key personnel in recruitment and hiring processes, and breaking down scheduling when it comes to leave, overtime, and different types of work schedules.
84. BCFP New Employee Survey	Hiring	Survey asking employees questions about their hiring experience, experience and satisfaction levels entering BCFP, and demographic information.
85. Tips on navigating CFPO job announcements on USAJobs	Hiring	Information regarding the job application process on USAJobs for BCFP, including information on the job description, required documents, and application status. This information is for anyone applying to BCFP
86. Examiner Vacancy Announcements	Hiring	List of all of the vacancies posted for Examiners from 2014 to present. Includes date posted, level, and department number.
87. Hiring, Promotion, and Internal Personnel Movements Policy	Hiring	Policy discussing hiring practices along with promotions and various internal movements.
88. Attorney Hiring and Promotion Policy	Hiring	Policy covers pre-recruitment planning, recruitment, candidate evaluation, selection and appointment (including minimum qualifications and substitution for experience).
89. Outreach Toolkit for Hiring Managers	Hiring	Document outlining best practices for hiring managers on how to recruit applicants. Focuses on how to reach a more diverse audience

Name	Topic Area	Description
		and how to advertise a vacancy while keeping compliant with BCFP rules and regulations.
90. Resume blinding	Hiring	Description of which 16 vacancy announcements that used blinding resumes as part of the minimum qualification review process.
91. Final Leader Competencies	Management	List of competencies pertaining to leaders in the organization.
92. New Manager Onboarding Support Tool	Management	Resource to assist with the onboarding of new leaders in BCFP including information about federal and BCFP practices and policies, timeline for onboarding, and leadership performance standards (first line, manager of managers, senior leader).
93. Competency Indicators by Pay band	Management	Breakdown of the competency indicators for complexity, independence, and impact in each of the pay bands.
94. Competencies for Leaders and Team Members	Management	Job competencies for non- Executive employees (communication, collaboration, problem solving, adaptability), non-Executive non-supervisory employees (subject matter expertise, strategic thinking, leading managing and developing others, managing resources), and Executive employees (leading change, leading people, results driven, business acumen, building coalitions).
95. Competency Families for Leaders and Team Members	Management	Document that distinguishes leader competencies from competencies for other team members.
96. Leader Performance Standards - First Line Supervisor	Management	Defining the leader performance standards for first line supervisors. Standards are divided into Working Through People, Investing in People, and Leveraging Expertise.
97. Leader Performance Standards - Manager of Managers	Management	Defining the leader performance standards for managers of managers. Standards are divided into Working Through People, Investing in People, and Leveraging Expertise.
98. Leader Performance Standards - Senior Leader	Management	Defining the leader performance standards for senior leaders. Standards are divided into Working Through People, Investing in People, and Leveraging Expertise.
99. Leadership Welcome Email	Management	Email introducing new leaders to the leadership team and outlining mandatory trainings and resources at their disposal.
100. Mentoring Bank	Mentoring	Provides a description of the Mentoring Bank Program 2.0 (OMWI)

Name	Topic Area	Description
Program: Guide for Mentors		including goals, value and benefits to mentors/mentees, value to BCFP, mentoring principles, and program requirements.
101. Best Practices for Mentors (2.0)	Mentoring	Describes best practices for mentors who are experienced and trusted advisors.
102. Mentoring Bank Program: Guide for Mentees	Mentoring	Provides a description of the Mentoring Bank Program 2.0 (OMWI) including goals, value and benefits to mentors/mentees, value to BCFP, desired characteristics of mentees, and program requirements.
103. Mentee Evaluation Form	Mentoring	Form for mentees to evaluate their mentors (measuring things like frequency of meetings, helpful feedback, social networks).
104. Mentoring Bank Program 2.0 Wiki Page	Mentoring	Wiki page that describes OMWI's Mentoring Bank Program 2.0 and includes links to other related pages (overview, mentor guide, mentee guide, best practices for mentors, best practices for mentee, mentor evaluation)
105. Best Practices for Mentees (2.0)	Mentoring	Describes best practices for mentees entering a mentoring relationship such as being committed and asking questions.
106. Mentoring Bank Program 2.0 Presentation	Mentoring	Describes the mentoring program including background and purpose, application criteria, pairing criteria, roles/responsibilities/guidelines, and expectations.
107. Collective Bargaining Agreement for NTEU and BCFP	Other/Miscellaneous	Description of the collective bargaining agreement for BCFP and NTEU. Includes a variety of topics including employee rights, health and safety, work schedules, training, travel, and others.
108. BCFP Strategic Plan (2013-2017)	Other/Miscellaneous	Description of BCFP's strategic plan for 2013-2017.
109. BCFP Strategic Plan (2018-2022)	Other/Miscellaneous	Description of BCFP's strategic plan for 2018-2022.
110. Update to PM System - All Employees	Performance management	Training to discuss the changes to the performance management system for all employees, focusing on why it is changing, what is staying the same, and what changes will be made down the road.
111. Update to PM System - Managers	Performance management	Training to discuss the changes to the performance management system for all managers, focusing on why it is changing, what is staying the same, and what changes will be made down the road. There is an emphasis on how coaching should be conducted by

Name	Topic Area	Description
		managers.
112. Performance Management	Performance management	Document outlining the process for performance management, both mid-year and year-end, along with what plans are in place for poor performing employees.
113. Role Profiles: Examinations, Investigations, and Compliance	Performance management	Provides information about Examiner and compliance jobs such as job descriptions, levels, skills, and development.
114. Meeting Kit for Employee Briefings	Performance management	Talking points for trainers to discuss a new performance management program with employees. The current aim is to increase coaching between managers and employees and provide more accurate performance ratings. Coaching in this program is structured as to how managers are to give feedback to keep the message clear. This document talks about the specific changes that are being made, the rationale behind them, and how they will benefit the bureau.
115. Meeting Kit for Manager Briefings	Performance management	Talking points for trainers to discuss a new performance management program with managers. Current aim is to increase coaching between managers and employees and provide more accurate performance ratings. Coaching in this program is structured as to how managers are to give feedback to keep the message clear. This document talks about the specific changes that are being made, the rationale behind them, and how they will benefit the bureau.
116. Skills and Interests Listening Guide	Performance management	Conversation guide to help managers navigate a conversation with a team member who wants to discuss the results of their Skills and Interests Reflection Tool.
117. Skills and Interests Conversation Starter Guide - for Team Members	Performance management	Guide designed for team members to help them to prepare for and navigate conversations with supervisors about the Skills and Interests Reflection Tool.
118. Recruiting Events	Recruitment	List of recruiting events and information about recruiting outreach.
119. Federal Equal Opportunity Recruitment Plan	Recruitment	Outline of 2017 FEORP plan focusing on diversity, inclusion, and sustainability. Also includes plan for 2018 focusing on diversity, inclusion, and sustainability. Includes activities related to Hispanic employment and employment of people with disabilities.

Name	Topic Area	Description
120. LES 5: Navigating Federal Human Resource Responsibilities - PowerPoint	Recruitment	Leadership training discussing MSP and PPP and their relation to recruitment and hiring with a focus on nepotism and discrimination, favoritism, and retaliation. Also discusses how to navigate a unionized environment and information on the grievance process.
121. LES 5: Navigating Federal Human Resource Management Responsibilities - Guide	Recruitment	Instructor's guide for leadership training discussing MSP and PPP and their relation to recruitment and hiring with a focus on nepotism and discrimination, favoritism, and retaliation. Also discusses how to navigate a unionized environment and information on the grievance process.
122. Vacancy Announcements Enhancements	Recruitment	Proposed changes to vacancy announcements focusing on summary, additional information, how you will evaluated, benefits, required documents, and assessment language.
123. Off-Boarding Policy	Separation	Off-boarding policy that includes instructions for the six areas of personnel off-boarding (initiation, notification to performers, counseling, certification and reporting, non-compliance, and debt identification/contract close-out for contractors).
124. BCFP Exit Survey Instrument	Separation	Survey asking employees questions regarding why they have decided to leave CFBP, their feelings regarding BCFP as a whole, and demographic information.
125. Exit Survey Data Tables (2012-2017)	Separation	Data tables from the Exit Survey (2012-2017) by gender, race, ethnicity, supervisory status, tenure, and grade.
126. External Training Procedures	Training	SOP outlining the steps to request external training and document that external training was completed.
127. External Training Policy	Training	Policy explaining what constitutes external training and how to go about getting external training approved.
128. Skillsoft Courses	Training	List of all SkillSoft courses, along with course information and a description of each course.
129. Training Catalog	Training	Overview of the training and development programs that are offered including the Examiner Commissioner Program, On the Job Training, and Continuing Education.
130. Supervision	Training	Schedule for Supervision Learning & Development trainings offered

Name	Topic Area	Description
Learning & Development Training Schedule - Wiki Page		in 2018.
131. Crucial Conversations	Training	Description of Crucial Conversations training which is focused on the skills for creating alignment and agreement by fostering open dialogue in high stakes or emotional conversations.
132. Crucial Conversations Training Evaluations	Training	Scanned evaluations from several different sessions of the Crucial Conversations
133. EEOC-led supervisor training evaluations	Training/Diversity	Course/training evaluations for the EEOC-led mandatory 2-day supervisor training.
134. Examiner Commissioning Program description and FAQ's	Training	Provides description of the commissioning program as well as Frequently Asked Questions about the program.
135. Study Guide for Examiner Commissioning Program	Training	Contains information about the written exam for the Examiner Commissioning Program including tips, sample test questions, and a list of topics that are covered.
136. Definition of Examiner in Charge	Training	Definition of the Examiner in Charge developmental assignments.
137. Candidate Instructions for Completing the Case Study Exercise	Training	Instructions for completing the Examiner case study including the case study document, Executive summary, exit meeting, and schedule.
138. Supervision, Enforcement, and Fair Lending (SEFL) Staff Memorandum	Training	Describes the Examiner Commissioning Program including the requirements and policies for test retakes, training waivers, and rotations.
139. BCFP Assessor Training Summary	Training	High-level outline of Assessor Training for the Assessors of the Examiner Case Study.

E-mail template for contacting participants

Executive Interviews

Dear _____,

My name is [name] and I am contacting you on behalf of Fors Marsh Group (FMG), an independent research firm that has been contracted by CFPB's Office of Civil Rights to conduct an assessment regarding employment opportunities for African American/Black and Hispanic/Latino(a) employees at CFPB.

As part of this effort, FMG will be conducting **a series of hour-long interviews** with African American/Black and Hispanic/Latino(a) CFPB Executives. A participant information sheet that provides additional detail about these interviews is attached. I am contacting you to see whether you would be willing to participate in a one-hour interview with a representative from FMG. We are hoping to schedule these interviews between [date] – [date]. If you are willing to participate, what days or times (Monday-Friday, 8:00am-6:00pm ET) would work best for you over the next few weeks?

Please let me know if you have any questions or concerns. We would very much appreciate your participation in this project!

Personnel involved with selection

Dear _____,

My name is [name] and I am contacting you on behalf of Fors Marsh Group (FMG), an independent research firm that has been contracted by CFPB's Office of Civil Rights to conduct an assessment regarding employment opportunities for African American/Black and Hispanic/Latino(a) employees at CFPB.

As part of this effort, FMG will be conducting **a series of hour-long interviews** with CFPB personnel involved with recruitment, hiring, and promotion. A participant information sheet that provides additional detail about these interviews is attached. I am contacting you to see whether you would be willing to participate in a one-hour interview with a representative from FMG. We are hoping to schedule these interviews between [date] and [date]. If you are willing to participate, what days or times (Monday-Friday, 8:00am-6:00pm ET) would work best for you over the next few weeks?

Please let me know if you have any questions or concerns. We would very much appreciate your participation in this project!

Focus groups with Examiners

Dear _____,

My name is [name] and I am contacting you on behalf of Fors Marsh Group (FMG), an independent research firm that has been contracted by CFPB's Office of Civil Rights to conduct an assessment regarding employment opportunities for African American/Black and Hispanic/Latino(a) employees at CFPB.

As part of this effort, FMG will be conducting **a series of 90-minute focus groups** with African American/Black and Hispanic/Latino(a) CFPB employees in the Examiner series. A participant information sheet that provides additional detail about these focus groups is attached. I am contacting you to see whether you would be willing to participate in a 90-minute focus group. We are hoping to schedule these focus groups between [date] and [date]. We will schedule focus groups at times that work best for the majority of invited participants. If you are willing to participate, what days or times (Monday-Friday, 8:00am-6:00pm ET) would work best for you over the next few weeks? Given that most Examiners are not located at CFPB Headquarters, the focus groups will be conducted remotely.

Please let me know if you have any questions or concerns. We would very much appreciate your participation in this project!

Focus groups with non-Examiners

Dear _____,

My name is [name] and I am contacting you on behalf of Fors Marsh Group (FMG), an independent research firm that has been contracted by CFPB's Office of Civil Rights to conduct an assessment regarding employment opportunities for African American/Black and Hispanic/Latino(a) employees at CFPB.

As part of this effort, FMG will be conducting **a series of 90-minute focus groups** with African American/Black and Hispanic/Latino(a) CFPB employees. A participant information sheet that provides additional detail about these focus groups is attached. I am contacting you to see whether you would be willing to participate in a 90-minute focus group. We are hoping to schedule these focus groups between [date] and [date]. We will schedule focus groups at times that work best for the majority of invited participants. If you are willing to participate, what days or times (Monday-Friday, 8:00am-6:00pm ET) would work best for you over the next few weeks? These focus groups will take place in-person for all non-remote CFPB employees so please make sure to provide us with days that you will be physically at the CFPB building.

Please let me know if you have any questions or concerns. We would very much appreciate your participation in this project!

Appendix E
Participant Information Sheet

Focus Groups

cfpb Consumer Financial Protection Bureau

FORS MARSH GROUP

ABOUT THIS PROJECT

You are being invited to participate in a fact-gathering project that CFPB has contracted with Fors Marsh Group (FMG) to conduct. This form describes the purposes and procedures of the project, its benefits and risks to participants, participants' rights, and precautionary measures that we will implement to protect the privacy and confidentiality of participants. A member of the FMG team is available to read through the form with you and answer any questions you may have (contact information provided at the end of this document).

What is the purpose of this project?
Every federal agency is required to assess on an ongoing basis whether its employment policies, practices, and procedures may pose unintended obstacles to equal employment opportunities based on race, national origin, sex, and disability. To meet these legal requirements, and consistent with guidance from the Office of Personnel Management and the Equal Employment Opportunity Commission, the CFPB's Office of Civil Rights is conducting an assessment regarding employment opportunities for African American/Black and Hispanic/Latina(o) employees at the Bureau. By holding discussions with CFPB employees like you, we hope to gain better insight into possible barriers to equal employment opportunity within the Bureau and, if necessary, identify remedies to address any barriers identified.

Do I have to participate in this project?
No. Your participation is entirely voluntary. There are no penalties associated with refusal to participate. If you do participate, you cannot be penalized or retaliated against in any way for participating in this project.

If I decide to participate, what will I be asked to do?
You will be asked to participate in a 90 minute focus group to discuss your own and others' experiences within the organization as well as your general perceptions and impressions about various policies, procedures, and practices. These focus groups will take place during May and June. Sessions will be conducted either in person at CFPB headquarters or virtually (if an employee is not located in the D.C. area).

What are the potential risks of participating in this project?
There are minimal risks associated with participation in this project. Participants will be asked to discuss their thoughts, attitudes, and experiences within their current role/occupation and CFPB as a whole. Participants do not have to answer any questions they do not wish to and are free to stop participating at any time.

Will it cost me anything to be in this project?
No, there are no costs associated with participating in this project. You may use work time to participate.

What steps will be taken to ensure participant privacy and confidentiality?
Everything you say during the interview will be heard by the interviewer, a note-taker, and other focus group participants. The interviewer will stress the importance of participants not discussing the thoughts or views expressed by other participants after the session has concluded.

The sessions will also be audio recorded and transcribed to assist with data analysis. However, neither the audio files nor the transcripts will be provided to CFPB and—consistent with the operative contract, Federal Acquisition Regulations, and federal recordkeeping requirements—FMG will not retain any of these materials after completing its analysis and reporting activities.

In addition, any personally identifying information will be redacted from the transcripts prior to data analysis to further safeguard participant privacy and confidentiality. That is, your name and other personal information will not be linked to your responses. Finally, individual responses will be aggregated in the final report (e.g., no direct quotes will be used) to help ensure participants' identities and their responses are protected. We have very robust systems in place to protect the information you share with us, but in the very unlikely event that there is a breach of confidentiality, appropriate steps will be taken to notify participants.

Does participating in this project provide me with any benefit?
Your participation in this project does not provide a direct benefit to you in the form of money or gifts. However, your input is important and will be critical in successfully identifying barriers (if any) to equal employment opportunity and formulating and implementing necessary solutions to eliminate barriers (if any) and otherwise implementing positive changes within CFPB.

Who may I contact if I have questions about the project?

If you have any questions or concerns about the project or your rights as a participant, please contact Dr. Bill Walton (571-858-3794; bwalton@forsmarshgroup.com). You may also contact CFPB Office of Civil Rights Senior Counsel Daniel Vail (202-435-7088; daniel.vail@cfpb.gov).

Please keep a copy of this sheet for your reference.

Interviews

ABOUT THIS PROJECT

You are being invited to participate in a fact-gathering project that CFPB has contracted with Fors Marsh Group (FMG) to conduct. This form describes the purposes and procedures of the project, its benefits and risks to participants, participants' rights, and precautionary measures that we will implement to protect the privacy and confidentiality of participants. A member of the FMG team is available to read through the form with you and answer any questions you may have (contact information provided at the bottom of this page).

What is the purpose of this project?
Every federal agency is required to assess on an ongoing basis whether its employment policies, practices, and procedures may pose unintended obstacles to equal employment opportunities based on race, national origin, sex, and disability. To meet these legal requirements, and consistent with guidance from the Office of Personnel Management and the Equal Employment Opportunity Commission, the CFPB's Office of Civil Rights is conducting an assessment regarding employment opportunities for African-American/Black and Hispanic/Latino(a) employees at the Bureau. By holding discussions with CFPB employees like you, we hope to gain better insight into possible barriers to equal employment opportunity within the Bureau and, if necessary, identify remedies to address any barriers identified.

Do I have to participate in this project?
No. Your participation is entirely voluntary. There are no penalties associated with refusal to participate. If you do participate, you cannot be penalized or retaliated against in any way for participating in this project.

You have the opportunity to opt-out from being invited to participate in the individual interviews. If you do not want to be contacted by FMG, please send an e-mail stating this to Bill Walton (bwalton@forsmarshgroup.com) before March 30, 2018.

If I decide to participate, what will I be asked to do?
You will be asked to participate in a one-hour interview to discuss your own and others experiences within the organization as well as your general perceptions and impressions about various policies, procedures, and practices. These interviews will take place during April and May. Sessions will be conducted either in person at CFPB headquarters or virtually (if an employee is not located in the D.C. area).

What are the potential risks of participating in this project?
There are minimal risks associated with participation in this project. Participants will be asked to discuss their thoughts, attitudes, and experiences within their current role/occupation and CFPB as a whole. Participants do not have to answer any questions they do not wish to and are free to stop participating at any time.

Will it cost me anything to be in this project?
No, there are no costs associated with participating in this project. You may use work time to participate.

What steps will be taken to ensure participant privacy and confidentiality?
Everything you say during the interview will be heard by the interviewer and recorded by a note taker. The sessions will also be audio recorded and transcribed to assist with data analysis. However, neither the audio files nor the transcripts will be provided to CFPB, and—consistent with the operative contract, Federal Acquisition Regulations, and federal recordkeeping requirements—FMG will not retain any of these materials. In addition, any personally identifying information will be redacted from the transcripts prior to data analysis to further safeguard participant privacy and confidentiality. That is, your name and other personal information will not be linked to your responses. Finally, individual responses will be aggregated in the final report (e.g., no direct quotes will be used) to help ensure participants' identities and their responses are protected. We have very robust systems in place to protect the information you share with us, but in the very unlikely event that there is a breach... of confidentiality, appropriate steps will be taken to notify participants.

Does participating in this project provide me with any benefit?
Your participation in this project does not provide a direct benefit to you in the form of money or gifts. However, your input is important and will be critical in successfully identifying barriers (if any) to equal employment opportunity and formulating and implementing necessary solutions to eliminate barriers (if any) and otherwise implementing positive changes within CFPB.

Who may I contact if I have questions about the project?

If you have any questions or concerns about the project or your rights as a participant, please contact Dr. Bill Walton (571-858-3794; bwalton@forsmarshgroup.com). You may also contact CFPB Office of Civil Rights Senior Counsel Daniel Vail (202-435-7068; daniel.vail@cfpb.gov).

Please keep a copy of this sheet for your reference.

BCFP Barrier Analysis Moderator Guide 11
May 2018
Population: Black/Hispanic Executives

Outline

Introduction	7 mins
Recruitment and Hiring	10 mins
Training and Development	10 mins
Future Career Paths/Advancement	15 mins
Details	5 mins
Separations	5 mins
Wrap Up	3 mins
TOTAL	**55 mins**

Introduction—7 minutes

Thank you so much for joining us today. My name is _____ and this is _____. We work for Fors Marsh Group, a private research firm based in the Washington, D.C. metro area. We are working with the Bureau to better understand the barriers to equal opportunity that may exist for Black and Hispanic employees and applicants. We are interested in uncovering any barriers that may exist bureau-wide. Potential barriers may be related to recruitment, hiring, promotion, separation, or other areas. We are working with the Bureau to uncover any related policies, practices, or procedures that could be addressed in order to eliminate barriers. Your input matters and will be critical to successfully implementing changes to policies and procedures. The information we gather today will inform a report that will be filed with the EEOC next year.

I'll be asking you a series of questions about your views and experiences related to the following topics: recruitment and hiring, training and development, career paths/advancement, details, and separations. _____ will be taking notes to make sure that we fully capture your views and opinions. Your candid thoughts are very valuable. Our discussion will take approximately one hour.

- To assist with our note-taking and later analysis, we are audio recording today's session. However, what we talk about here will be kept in the strictest of confidence. The recording will not be shared with anyone in the Bureau, and any responses we may include in our final report will not be linked to you in any way. To protect the identities of others, please use names sparingly when referring to other people and, if you feel you need to use names, only use first names.

- Your participation in this discussion is entirely voluntary. You are free to stop participating at any point in time, and you may choose not to answer any question you do not wish to answer.

Before we begin, do you have any questions or concerns? Okay, then, I will start the recording and we can get started.

Recruitment and Hiring—10 mins

First, let's talk about your experiences with and perceptions of recruitment and hiring at the Bureau.

1. Can you tell me your thoughts about the recruitment and hiring processes at the Bureau?
   - Did you personally face any challenges during the hiring process?
     - If YES: Can you tell me more about that?

2. Are there any procedures, policies, or practices that you think may create barriers to recruitment and hiring of Black/Hispanic applicants for both executive and non-executive positions?
   - How could these policies or practices be improved?

Training and Development—10 mins

Okay, now I'd like to hear about your experiences with and perceptions of training and development opportunities within both your series and in the Bureau as a whole.

3. What developmental opportunities are available to employees who are trying to advance to the Executive level?
   - Which of these opportunities focus on the competencies or experiences required for advancement?

4. How are employees identified and selected for training and developmental opportunities?
   - Does selection for training and development opportunities appear to differ by race/ethnicity or gender?
     - If YES: Can you tell me more about that?

Future Career Paths and Advancement—15 mins

I'd also like to spend some time discussing career paths and opportunities for advancement at the Bureau.

5. Do you think there any unique barriers or obstacles to advancement faced by Black and Hispanic employees at the Bureau? What about at the Executive level, in particular?
   - If YES: What are these barriers?
   - If YES: Do you feel these barriers differ for women?

6. What challenges, if any, have you faced during the promotion process at the Bureau?

- If any: Can you tell me more about that? (Probe for level and stage in the process at which the challenge was encountered)

7. Have you received any mentoring or coaching during your time at the Bureau?
   - If YES: Can you describe what that looked (or looks) like? What role has this played in your career progression?
   - Do you believe that Black and Hispanic employees have the same opportunities to receive mentoring and coaching as other employees at the Bureau?

8. What role do performance evaluations play in promotions?

9. Can you think of any characteristics of the performance appraisal system that might negatively impact Black or Hispanic employees?

Details – 5 minutes

Next, I have a few questions about detail assignments.

10. What is the application and selection process like for internal and external details?

11. How has the hiring freeze affected this process, if at all?

Separations—5 mins

Finally, I'd like to discuss reasons why some employee may choose to leave.

12. Are there any factors that you believe may disproportionately impact Black and Hispanic employees' or Black and Hispanic Executives' likelihood of leaving the Bureau?

13. Are there improvements to Bureau policies, procedures, or processes that you believe would prevent disproportionate separations by Black and Hispanic employees or Black and Hispanic Executives?

Wrap-Up – 3 minutes

Well, that wraps up our discussion for today. I'd like to thank you again for taking the time out of your day to be here. Your insights will be invaluable to our research efforts and will help to inform policy and procedural improvements at the Bureau. Is there anything else you'd like to mention that you feel wasn't adequately addressed by our discussion?

Great, thank you again for your time.

BCFP Barrier Analysis Moderator Guide
11 May 2018

Population: Personnel involved in recruiting, selection, promotion (3 interviews, total)

Outline

Introduction	7 mins
Recruitment and Hiring	20 mins
Training and Development	10 mins
Future Career Paths/Advancement	20 mins
Wrap Up	3 mins
TOTAL	**60 mins**

Introduction—7 minutes

Thanks you so much for joining us today. My name is _____ and this is _____. We work for Fors Marsh Group, a private research firm based in the Washington, D.C. metro area. We are working with the Bureau to better understand the barriers to equal opportunity that may exist for Black and Hispanic employees and applicants. We are interested in uncovering any barriers that may exist bureau-wide as well as within the Examiner occupation. Potential barriers may be related to recruitment, hiring, promotion, separation, or other areas. We are working with the Bureau to uncover any related policies, practices, or procedures that could be addressed in order to eliminate barriers. Your input matters and will be critical to successfully implementing changes to policies and procedures. The information we gather today will inform a report that will be filed with the EEOC next year.

I'll be asking you a series of questions about your views and experiences related to the following topics: recruitment and hiring, training and development, and career paths/advancement. _____ will be taking notes to make sure that we fully capture your views and opinions. Your candid thoughts are very valuable. Our discussion will take approximately one hour.

- To assist with our note-taking and later analysis, we are audio recording today's session. However, what we talk about here will be kept in the strictest of confidence. The recording will not be shared with anyone in the Bureau, and any responses we may include in our final report will not be linked to you or your team in any way. To protect the identities of others, please use names sparingly when referring to other people and, if you feel you need to use names, only use first names.

- Your participation in this discussion is entirely voluntary. You are free to stop participating at any point in time, and you may choose not to answer any question you do not wish to answer.

Before we begin, do you have any questions or concerns? Okay, then, I will start the recording and we can get started.

Recruitment and Hiring—20 mins

First, I'd like to talk about your experiences with recruitment and hiring at the Bureau.

1. Can you describe your process for recruitment and hiring at the Bureau? *(Prompts: How are vacancy announcements advertised? Who screens the applications? What type of training do interviewers receive? What is the average length of time from application to hire?)*

2. Before the hiring freeze, how did the Bureau recruit racially/ethnically diverse applicants?

3. Before the hiring freeze, did you find it more challenging to identify and attract Black or Hispanic applicants for certain occupations?
   - If YES: Which occupations/groups? Why do you think this was the case?

4. Are there any procedures, policies, or practices that you think may create barriers to the recruitment and hiring of Black or Hispanic applicants?

5. Is the selection process reviewed periodically to ensure equal treatment regardless of race/ethnicity or sex?

6. Are selection panels used for new hires and promotions?
   - If YES: How is it determined who will serve on the panels? Is the Office of Civil Rights consulted when these decisions are made?

7. How is salary determined for internal and external hires?
   - Can you think of any ways that these processes could be improved?

Training and Development—10 mins

Next, we would like to ask some questions about training and development opportunities.

8. How are employees identified and selected for training and developmental opportunities?
   - Does selection for training and development opportunities appear to differ by race/ethnicity or gender?
     - If YES: Can you tell me more about that?

9. Can you tell me about the application and selection process for internal and external detail assignments?

10. Can you tell me about how diversity and inclusion training is received by employees at the Bureau?
    - Do you conduct an evaluation of these programs? If not, what is your sense of the effectiveness of the programs?
    - Can you think of any ways this training could be improved?

Future Career Paths and Advancement, Separations—20 mins

Finally, I'd like to spend some time discussing career paths and opportunities for advancement.

11. Could you tell me about any leadership development or formal mentoring programs that are available to employees who are looking to advance into senior leadership positions?

12. Do you perceive any unique barriers to promotion for Black or Hispanic employees?
    - If YES: What are these? (Probe for stage of the process)
    - If yes: Do you feel these barriers differ for women?
    - Is there a specific level or occupation for which these barriers occur?
    - How could you think these barriers could be addressed?

13. What procedures does the Bureau use to determine if promotion qualification requirements are job-related and consistent with business necessity?

14. What role do performance evaluations play in promotions?

15. Can you think of any characteristics of the performance appraisal system that might negatively impact Black or Hispanic employees?

16. Can you tell me about succession planning at the Bureau?

17. Can you think of any improvements to Bureau policies, procedures, or processes that could be made to prevent disproportionate separations by racial/ethnic minorities?

Wrap-Up – 3 minutes

Well, that wraps up our discussion for today. I'd like to thank you again for taking the time out of your day to be here. Your insights will be invaluable to our research efforts and will help to inform policy and procedural improvements at the Bureau. Is there anything else you'd like to mention that you feel wasn't adequately addressed by our discussion?

Great, thank you again for your time.

BCFP Barrier Analysis Moderator Guide
11 May 2018
Population: Black and Hispanic Examiners (3 groups, total)

Outline

Introduction	10 mins
Ice-breaker	5 mins
Recruitment and Hiring	5 mins
Training and Development	5 mins
Examiner Commissioning Process	10-15 mins
Future Career Paths/Advancement	10 mins
Details	5 mins
Work Environment/Climate	15 mins
Separations	5 mins
Wrap-Up	5 mins
TOTAL	**80-85 mins**

Introduction—10 minutes

Thanks, everyone, for joining us today. My name is _____ and this is _____. We work for Fors Marsh Group, a private research firm based in the Washington, D.C. metro area. We are working with the Bureau to better understand the barriers to equal opportunity that may exist for Black and Hispanic employees and applicants. We are interested in uncovering any barriers that may exist bureau-wide as well as within the Examiner occupation. Potential barriers may be related to recruitment, hiring, promotion, or separation. We are working with the Bureau to uncover any related policies, practices, or procedures that could be addressed in order to eliminate barriers. Your input matters and will be critical to successfully implementing changes to policies and procedures. The information we gather today will inform a report that will be filed with the EEOC next year.

I'll be asking you several questions about your views and experiences related to recruitment and hiring, training and development, examiner commissioning process, future career paths/advancement, details, work environment/climate, and separations. _____ will be taking notes to make sure that we fully capture everyone's views and opinions. We're very interested to hear what everyone has to say so, please, speak up— especially if what you have to say is different from what someone else has said. Your candid thoughts are very valuable. You don't have to answer every question that I ask, but I do want to hear from each of you, so I may call on you at some point. Our discussion will take approximately 90 minutes. Do you have any questions so far?

Great. Before we get started with our discussion, I'd just like to go over a few more things.

- I have a discussion guide in front of me that outlines the questions I need to ask and will help me keep our discussion on track. Because it is important that we cover all of the topics, I may have to interrupt our discussion at some point to move us on to a different topic.

- To assist with our note-taking and later analysis, we are audio recording today's session. However, what we talk about here will be kept in the strictest of confidence. The recording will not be shared with anyone in the Bureau and any responses we may include in our final report will not be linked to you or your team in any way.

- In our experience, most participants feel more comfortable contributing to the collective dialogue knowing their remarks will not be shared outside the confines of this session. Thus, to maintain the confidentiality of discussions to encourage a spirit of openness and shared learning we ask if each of you is willing to commit to not sharing other participants' stories, examples, or comments. However, nothing in this "agreement" is intended to discourage or prevent participants from exercising their right or obligation to report actual or suspected discrimination, harassment, or retaliation (e.g., to the Bureau's Office of Human Capital or Office of Civil Rights) and/or to engage in protected whistleblowing activity (e.g., by contacting the Inspector General or the U.S. Office of Special Counsel).

- Please speak one at a time and try not to engage in side conversations during the discussion. We want to be able to hear what everyone has to say—either today or when we go back to listen to the audio recording to analyze our data and write our report.

- Your participation in this discussion is entirely voluntary. You are free to leave the room any point in time, and you may choose not to answer any question you do not wish to answer.

- If you have a cell phone with you, please turn it off or switch it to silent mode at this time.

Before I begin, does anyone have questions or concerns? Okay, then, I will start the recording and we can get started.

Ask participants to introduce themselves by first name only, state their position/occupation, and state how long they have been working at the Bureau. Moderator introduces him-/herself last.

Icebreaker – 5 minutes

I'd like to do a quick icebreaker to get to know each other a bit better. Can we go around the room and have everyone tell us their favorite thing is to do in their free time?

Recruitment and Hiring—5 mins

Now, let's talk about your experiences with and perceptions of recruitment and hiring at the Bureau.

1. Can you tell me your thoughts about the recruitment and hiring processes at the Bureau?
   - Did you personally face any challenges during the hiring process?
     - If YES: Can you tell me more about that?

Training and Development—5 mins

Okay, now I'd like to hear about your experiences with and perceptions of training and development opportunities within the Examiner occupation as well as at the Bureau, more generally.

2. How do you feel your participation (or lack thereof) in training and developmental opportunities has affected your career development and advancement within the Bureau?

3. [Moderator note: Ask if time allows.] Are there any skills or competencies for which you feel you need training but training or development opportunities are not available?
   - If YES: What are the skills/competencies you'd like training in? Why do you believe the necessary opportunities are not available?

Examiner Commissioning Process—10-15 mins

Next, I'd like to focus specifically on the commissioning process.

4. [For CN-51 and below, only] Can you describe your experience as an Examiner who has not yet been commissioned? What is the progression towards commissioning like? Do you think it is fair and equitable?

5. Can you describe the Examiner Commissioning Program?
   - What is the culture of this program like? For example, is it competitive? Supportive?
   - Do you feel like you had/have all of the resources and support that you need to succeed in this program?
     - If NO: What additional resources and support do you need?

6. [For Commissioned Examiners—CN-52 and above—only] Can you describe your experience with the assessments at the end of the Examiner Commissioner Program (the multiple choice test and case study)?
   - Do you think these assessments are fair and equitable? Why or why not?
     - If NO: How do you think they could be improved?

7. [For Commissioned Examiners—CN-52 and above—only] My next question is for those of you who have been an Examiner-in-Charge. Can you tell me a little bit about what that experience was like, including the process of becoming an Examiner-in-Charge?
   - Is there anything you think could be improved? What?

8. Are there any unique challenges that Black or Hispanic employees face in the Examiner Commissioning Program?

- If YES: Do these challenges seem to apply to both men and women?

9. Why might someone decide *not* to pursue their Commission at the Bureau?

Future Career Paths and Advancement—15 mins

I'd also like to spend some time discussing career paths and opportunities for advancement at the Bureau.

10. Are the requirements for advancement clear to you?
    - If NO: What areas need more clarity?
    - If YES: Do you think they're fair and equitable? Why (not)?

11. What role do performance evaluations play in promotions?
    - Do you think performance evaluations are fair and equitable? Why (not)?
    - Do you have any experiences or opinions you'd like to share about the Bureau's handling of complaints or disciplinary actions?

12. Are you aware of any mentoring or coaching opportunities at the Bureau? (Note: Primarily interested in yes/no responses.)

13. Do you perceive any unique barriers or obstacles to advancement faced by Black or Hispanic employees in the Examiner occupation, specifically?
    - If YES: What are these? Do you feel these barriers differ between men and women?

Details – 5 minutes

Next, I have a few questions about detail assignments.

14. Can you tell me your thoughts about the application and selection process for internal and external details?
    - How easy or difficult is it to learn about detail opportunities? [Note: We would like to get a pulse on perceptions but do not want to spend a lot of time here.]

Work Environment/Climate—10 mins

Next, we'd like to discuss what it's like to work at the Bureau. This might involve, for example, your interactions with other employees, the Bureau's general culture or climate, your feelings about your work environment.

15. How would you describe employee morale among Examiners at the Bureau, overall? What about within your specific office or division? [Note: We want to give them the chance to discuss briefly but do not want to spend a lot of time here.]
    - [If morale reported to be poor/low] Why do you think this is?
    - Has morale changed recently?

16. Do you believe that morale within the Examiner series differs among racial groups?
    - If YES: How so? What do you think contributes to that difference? How might it be mitigated or eliminated? Do you believe that employee morale within the Examiner series differs by gender?
    - If YES: How so? What do you think contributes to that difference? How might it be mitigated or eliminated?
    - Are there any racial or gender disparities in other aspects of your work as Examiners?

17. Are you aware of any specific issues or challenges that negatively impact the work environment for Black and Hispanic Examiners at the Bureau?

18. How is your work-life balance at the Bureau?

Separations — 5 mins

We'd like to end our discussion today by hearing your thoughts about why some employees choose to leave the Bureau.

19. Why do you believe some Examiners choose to leave the Bureau?

20. Are there factors that you believe may disproportionately impact Black or Hispanic Examiners' likelihood of leaving the Bureau?

Wrap-Up — 5 minutes

Well, that wraps up our discussion for today. I'd like to thank you again for taking the time out of your day to be here. Your insights will be invaluable to our research efforts and will help to inform policy and procedural improvements at the Bureau. Is there anything else you'd like to mention that you feel wasn't adequately addressed by our discussion? We also wanted to give you the opportunity to share any additional thoughts in writing. Anything you write down will be kept confidential. [Hand out questionnaire]

Great, thank you again for your time.

BCFP Barrier Analysis Moderator Guide
11 May 2018

Population: Black/Hispanic Non-Examiners (6 groups, total)

Outline

Introduction	10 mins
Ice-breaker	5 mins
Recruitment and Hiring	5 mins
Training and Development	15 mins
Future Career Paths/Advancement	20 mins
Details	5 mins
Work Environment/Climate	15 mins
Separations	5 mins
Wrap Up/Questionnaire	5 mins
TOTAL	**85 mins**

Introduction—10 minutes

Thanks, everyone, for joining us today. My name is _____ and this is _____. We work for Fors Marsh Group, a private research firm based in the Washington, D.C. metro area. We are working with the Bureau to better understand the barriers, or obstacles, to equal opportunity that may exist for Black and Hispanic employees and applicants. Potential barriers may be related to recruitment, hiring, promotion, separation, or other areas. We are working with the Bureau to uncover any related policies, practices, or procedures that could be addressed in order to eliminate any potential barriers. Your input matters and will be critical to successfully implementing changes to policies and procedures. The information we gather today will inform a report that will be filed with the EEOC next year.

I'll be asking you several questions about your views and experiences related to the following topics: recruitment and hiring, training and development, career paths/advancement, details, work environment/climate, and separations. _____ will be taking notes to make sure that we fully capture everyone's views and opinions. We're very interested to hear what everyone has to say so, please, speak up— especially if what you have to say is different from what someone else has said. Your candid thoughts are very valuable. You don't have to answer every question that I ask, but I do want to hear from each of you, so I may call on you at some point. Our discussion will take approximately 90 minutes. Do you have any questions so far?

Great. Before we get started with our discussion, I'd just like to go over a few more things.

- I have a discussion guide in front of me that outlines the questions I need to ask and will help me keep our discussion on track. Because it is important that we cover all of the topics, I may have to interrupt our discussion at some point to move us on to a different topic.

- To assist with our note-taking and later analysis, we are audio recording today's session. However, what we talk about here will be kept in the strictest of confidence. The recording will not be shared with anyone in the Bureau and any responses we may include in our final report will not be linked to you in any way.

- In our experience, most participants feel more comfortable contributing to the collective dialogue knowing their remarks will not be shared outside the confines of this session. Thus, to maintain the confidentiality of discussions to encourage a spirit of openness and shared learning we ask if each of you is willing to commit to not sharing other participants' stories, examples, or comments. However, nothing in this "agreement" is intended to discourage or prevent participants from exercising their right or obligation to report actual or suspected discrimination, harassment, or retaliation (e.g., to the Bureau's Office of Human Capital or Office of Civil Rights) and/or to engage in protected whistleblowing activity (e.g., by contacting the Inspector General or the U.S. Office of Special Counsel).

- Please speak one at a time and try not to engage in side conversations during the discussion. We want to be able to hear what everyone has to say—either today or when we go back to listen to the audio recording to analyze our data and write our report.

- Your participation in this discussion is entirely voluntary. You are free to leave the room any point in time, and you may choose not to answer any question you do not wish to answer.

- If you have a cell phone with you, please turn it off or switch it to silent mode at this time.

Before I begin, does anyone have questions or concerns? Okay, then, I will start the recording and we can get underway.

Ask participants to introduce themselves by first name only, state their position/occupation, and state how long they have been working at the Bureau. Moderator introduces him-/herself last.

Icebreaker – 5 minutes

I'd like to do a quick icebreaker to get to know each other a bit better. Can we go around the room and have everyone tell us their favorite thing is to do in their free time?

Recruitment and Hiring – 5 mins

Now, let's move talk about your experiences with and perceptions of recruitment and hiring at the Bureau.

1. Can you tell me your thoughts about the recruitment and hiring procedures, policies, and processes at the Bureau?
    - Did you personally face any challenges during the hiring process?
        - If YES: Can you tell me more about that?

Training and Development—15 mins

Okay, now I'd like to hear about your experiences with and perceptions of training and development opportunities within both your series and the Bureau as a whole.

2. What do you think about the developmental opportunities provided to you by the Bureau?
   - Which of these opportunities have focused on competencies or experiences required for advancement?
   - Have you faced any challenges getting approval for training or development opportunities?

3. How do you feel your participation (or lack thereof) in training and developmental opportunities has affected your career development and advancement within the Bureau?

4. [Note: Ask if time allows.] Are there any skills or competencies that you feel you need training in but training or types of development opportunities are not available?
   - If YES: What are these skills or competencies? Why do you believe the developmental opportunities you'd like to see are not available?

Future Career Paths and Advancement—20 mins

I'd also like to spend some time discussing career paths and opportunities for advancement at the Bureau.

5. In general, what are your thoughts about the Bureau's promotion and advancement processes?

6. Are the requirements for advancement clear to you?
   - If NO: What areas need more clarity?
   - If YES: Do you think they're fair and equitable? Why (not)?

7. What role do performance evaluations play in promotions?
   - Do you think performance evaluations are fair and equitable? Why (not)?
   - Do you have any experiences or opinions you'd like to share about the Bureau's handling of disciplinary actions?

8. Are you aware of any mentoring or coaching opportunities at the Bureau?
   - If YES: How easy or difficult is it to take advantage of these opportunities? Has anyone personally taken advantage of these opportunities?
     - If YES: What was your experience?
     - If NO: Why not?

9. Do you perceive any unique barriers or obstacles to advancement faced by [Black/Hispanic] employees?

- If YES: What are these? Do you feel these barriers differ for men and women?

Details – 5 minutes

Next, I have a few questions about detail assignments.

10. Can you tell me your thoughts about the recruitment and selection process for internal and external details?
    - How easy or difficult is it to learn about detail opportunities? [Note: We would like to get a pulse on perceptions but do not want to spend a lot of time here.]

Work Environment/Climate—15 mins

Next, we'd like to discuss what it's like to work at the Bureau. These might involve, for example, your interactions with other employees, the Bureau's general culture or climate, your feelings about your work environment.

11. How would you describe employee morale at the Bureau, overall? What about within your specific office or division? [Note: We want to give them the chance to discuss briefly but do not want to spend a lot of time here.]
    - [If morale reported to be poor/low] Why do you think this is?
    - Has morale changed recently?

12. Do you believe that employee morale differs among racial groups at the Bureau?
    - If YES: How so? What do you think contributes to that difference? How might it be mitigated or eliminated?

13. Do you believe that employee morale differs by gender?
    - If YES: How so? What do you think contributes to that difference? How might it be mitigated or eliminated?

14. Are you aware of any specific issues or challenges that negatively impact the work environment for Black or Hispanic employees at the Bureau?

15. [Note: Only ask if time allows.] How is your work-life balance at the Bureau?

Separations—5 mins

Next, we would like to hear about reasons why some employees choose to leave the Bureau.

16. Why do you believe some employees choose to leave the Bureau??

17. Are there factors that you believe may disproportionately impact [Black/Hispanic] employees' likelihood of leaving the Bureau?

Wrap-Up – 5 minutes

Well, that wraps up our discussion for today. I'd like to thank you again for taking the time out of your day to be here. Your insights will be invaluable to our research efforts and will help to inform policy and procedural improvements at the Bureau. Is there anything else you'd like to mention that you feel wasn't adequately addressed by our discussion? We also wanted to give you the opportunity to share any additional thoughts in writing. Anything you write down will be kept confidential. [Hand out questionnaire]

Great, thank you again for your time.

Appendix G
Post-Session Questionnaire

Non-Examiner employees, Executives, and personnel involved with selection

6

Equal Employment Opportunity
Post-Focus Group Questionnaire

1. What do you think the top priorities of the Bureau should be in terms of ensuring equal opportunity for Black and Hispanic employees?

2. Do you have any thoughts, concerns, or experiences that you would like to share with us in addition to those discussed today?

Examiners

Equal Employment Opportunity
Post-Focus Group Questionnaire

1. What do you think the top priorities of the Bureau should be in terms of ensuring equal opportunity for Black and Hispanic employees in the Examiner occupation?

2. Do you have any thoughts, concerns, or experiences that you would like to share with us in addition to those discussed today?

Appendix H
IDI and Focus Group Content Codebook

Text selection guidelines

- Do not code participant introductions, clarification questions, and irrelevant tangents.
- Do not code the moderator questions.
- Only code an interjection if it is not captured somewhere else.
- Code starting from the beginning of the sentence where the participant first talks about the code until the end of the paragraph when they finish speaking. If a paragraph references two (or more) categories, then you can code it into multiple categories.

Coding Guidelines

- Paragraphs can be categorized into codes and flags. All paragraphs should be categorized into one or more codes within the appropriate/relevant category (e.g., recruiting, Examiner Commissioning Program). Flags should only be assigned with a regular code, never alone. Paragraphs can be double coded and double flagged unless otherwise indicated.
- To distinguish recruitment from hiring/selection, we will define recruitment as anything occurring before an application is submitted. Anything after an individual has submitted their application will be considered related to hiring/selection.
- Anything coded as a suggestion should be actionable or a specific change, not just pointing out something the participant is dissatisfied with (would be coded as negative).
- Personal experience codes should be used if the participant describes a specific story, anecdote, or experience. If they describe the procedure or process that occurs (e.g., in their office) then this would not be coded as personal experience.

Recruitment	
	Description and example
Codes	
Positive comment about the recruiting process.	Described a positive aspect of the recruiting process within the Bureau. *Example.* The Bureau is better at recruiting now than it used to be; The bureau makes an effort to recruit from diverse sources.
Negative comment about the recruiting process.	Described a negative aspect of the recruiting process within the Bureau. *Example.* Personal relationships with individuals already employed by the Bureau help people get referred over others without connections; Recruiting Executives from certain sources (e.g., industry, excluding non-profits) limits diversity of the applicant pool for Executive positions
Suggestion of improvement to the recruiting process.	Suggested something about the recruiting process that could be improved. *Example.* The Bureau should widen their pool of applicants that they recruit from.
Information about the recruiting process.	Description of the Bureau's recruiting process. Should NOT be double coded with any of the other codes. *Example.* How the Bureau recruits applicants.
Other	Anything that doesn't fit into the other codes about recruiting that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about the recruiting process.	Describes an aspect of recruiting that is specifically related to the recruitment of diverse candidates. *Example.* The Bureau does/does not recruit from diverse events, universities, or other organizations and needs to expand to focus on more diverse schools and organizations (e.g., expand schools visited beyond the Ivy League).
Comment about the participant's personal experience with recruiting.	Participant described *their own* recruitment experience. *Example.* How they found out about the position.
Critical incident related to recruitment.	Anything particularly interesting or alarming related to diversity & inclusion during the recruitment process.
Hiring/Selection	
	Description and example

Codes	
Positive comment about the hiring/selection process.	Described a positive aspect of the hiring/selection process within the Bureau. *Example*. Hiring/selection is done well at the Bureau; There are steps taken to minimize bias during the interview process.
Negative comment about the hiring/selection process.	Described a negative aspect of the hiring/selection process within the Bureau. *Example*. Salary negotiations are challenging/not equitable; Issues being assigned a grade reflecting experience level.
Suggestion of improvement to the hiring/selection process.	Suggested something about the hiring/selection process that could be improved. *Example*. The hiring process should be made more equitable.
Information about the hiring/selection process.	Description of the Bureau's hiring/selection process. Should NOT be double coded with any of the other codes. *Example*. The Bureau's process for interviewing, reviewing applications, classifying jobs, determining salary.
Other	Anything that doesn't fit into the other codes about hiring/selection that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about the hiring/selection process.	Describes an aspect of recruiting that is specifically related to the hiring/selection of diverse candidates. *Example*. Minorities/females receive lower salaries than their non-minority/male counterpart; White applicants are being hired over minority applicants.
Comment about the participant's personal experience with hiring/selection.	Participant described *their own* hiring/selection experience. *Example*. Their interview experience.
Critical incident related to hiring/selection.	Anything particularly interesting or alarming related to diversity & inclusion during the hiring/selection process.
Details	
Description and example	
Codes	
	Described a positive aspect of detailing.

	Example. Many detailing opportunities; Detailing is a helpful developmental opportunity.
Negative comment about detailing.	Described a negative aspect of detailing. *Example.* Details are only posted for higher pay-bands, making them difficult to attain for lower levels; Details are created without allowing for competition and/or created with someone specific in mind; Increased details are burdening teams.
Suggestion of improvement to detailing.	Suggested something about detailing that could be improved. *Example.* Improving the detail selection process.
Information about detailing.	Description of detailing within the Bureau. Should NOT be double coded with any of the other codes. *Example.* How employees are selected for details.
Other	Anything that doesn't fit into the other codes about detailing that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about detailing.	Describes an aspect of detailing that is specifically related to diversity/minority employees. *Example.* There are some loopholes used to create details for White employees but not minorities.
Comment about the participant's personal experience with detailing.	Participant described *their own* detailing experience. *Example.* How they were selected for a detail; What they got out of their detail.
Critical incident related to detailing.	Anything particularly interesting or alarming related to diversity & inclusion during detailing.
Training and Development	
	Description and example
Codes	
Positive comment about training and development.	Described a positive aspect of training and development within the Bureau.

	Example. Satisfied with the training offerings; The training they have received has been helpful; Manager has advocated for their training and development.
Negative comment about training and development.	Described a negative aspect of training and development within the Bureau. *Example.* Lack of funds to receive training; Issues getting manager signoff for training; Limited training offerings.
Suggestion of improvement to training and development.	Suggested something about training and development that could be improved. *Example.* Suggestions for additional training offerings; More trainings specifically for minority employees.
Information about training and development.	Description of the Bureau's training and development. Should NOT be double coded with any of the other codes. *Example.* Trainings that are offered; Procedure for participating in trainings.
Other	Anything that doesn't fit into the other codes about training and development that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about training and development.	Describes an aspect of training and development that is specifically related to diverse employees. *Example.* Unfair distribution of trainings between minority and non-minority employees; There is a need for minority centered trainings.
Comment about the participant's personal experience with training and development.	Participant described *their own* training and development experience. *Example.* How they were selected for a training opportunity; Barriers they faced to taking part in training.
Critical incident related to training and development.	Anything particularly interesting or alarming related to diversity & inclusion during the training and development process.
Future Career Paths/Advancement	
	Description and example
Codes	
Positive comment about future career paths/advancement.	Described a positive aspect of future career paths/advancement within the Bureau. *Example.* Promotion processes are structured and fair; Performance standards are

	objective and non-discriminatory.
Negative comment about future career paths/advancement.	Described a negative aspect of future career paths/advancement within the Bureau. *Example.* Variety of barriers to promotion (e.g., promotion freeze, lack of positions to be promoted into, flat organizational hierarchy)
Suggestion of improvement to future career paths/advancement.	Suggested something about future career paths/advancement that could be improved. *Example.* Suggestion about performance evaluations, salary negotiation during promotion.
Information about future career paths/advancement.	Description of the Bureau's future career paths/advancement. Should NOT be double coded with any of the other codes. *Example.* How employees are promoted; The structure of performance evaluations.
Other	Anything that doesn't fit into the other codes about future career paths/advancement that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about future career paths/advancement.	Describes an aspect of future career paths/advancement that is specifically related to the diverse employees. *Example.* The old performance evaluation system was discriminatory; Managers make promotion decisions differently between minorities and non-minorities.
Comment about the participant's personal experience with future career paths/advancement.	Participant described *their own* future career path/advancement experience. *Example.* How they were prompted; Barriers to their promotion.
Critical incident related to future career paths/advancement.	Anything particularly interesting or alarming related to diversity & inclusion and future career path/advancement should be included as an example or noted in the report.
Mentoring	
Description and example	
Codes	
Positive comment about mentoring.	Described a positive aspect of mentoring within the Bureau. *Example.* Positive impact of mentoring.
	Described a negative aspect of mentoring within the Bureau.

	Example. Negative impact of mentoring.
Suggestion of improvement to mentoring.	Suggested something about mentoring that could be improved. *Example.* Suggestion to improving the mentoring program, offerings for mentoring.
Information about mentoring.	Description of the Bureau's mentoring program (formal or informal). Should NOT be double coded with any of the other codes. *Example.* How mentoring within the Bureau is structured.
Other	Anything that doesn't fit into the other codes about mentoring that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about mentoring.	Describes an aspect of mentoring that is specifically related to diverse candidates. *Example.* How mentoring differs between races/ethnicities.
Comment about the participant's personal experience with mentoring.	Participant described *their own* mentoring experience (mentoring someone else or being mentored). *Example.* Their mentoring experience with a formal or informal mentor.
Critical incident related to mentoring.	Anything particularly interesting or alarming related to diversity & inclusion in mentoring.
Executive Coaching	
Description and example	
Codes	
Positive comment about Executive coaching.	Described a positive aspect of Executive coaching within the Bureau. *Example.* Positive impact of Executive coaching.
Negative comment about Executive coaching.	Described a negative aspect of Executive coaching within the Bureau. *Example.* Negative impact of Executive coaching.
Suggestion of improvement to Executive coaching.	Suggested something about Executive coaching that could be improved. *Example.* Suggestion to improving the Executive coaching program, offerings for Executive coaching.

Information about Executive coaching.	Description of the Bureau's Executive coaching program (formal or informal). Should NOT be double coded with any of the other codes. *Example.* How Executive coaching within the Bureau is structured.
Other	Anything that doesn't fit into the other codes about Executive coaching that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about Executive coaching.	Describes an aspect of Executive coaching that is specifically related to diverse candidates. *Example.* How Executive coaching differs between races/ethnicities.
Comment about the participant's personal experience with Executive coaching.	Participant described *their own* Executive coaching experience (Executive coaching someone else or being mentored). *Example.* Their Executive coaching experience with a formal or informal mentor.
Critical incident related to Executive coaching.	Anything particularly interesting or alarming related to diversity & inclusion in Executive coaching.
Separation	
	Description and example
Codes	
Positive comment about separations.	Described a positive aspect of separations within the Bureau. *Example.* Employees stay with the Bureau because they identify with the mission, enjoy working with their colleagues.
Negative comment about separations.	Described a negative aspect of separations within the Bureau. *Example.* Reasons why an employee may separate (e.g., low salary, lack of opportunity to advance, discriminatory environment).
Suggestion of improvement to the separation process.	Suggested something about separations that could be improved. *Example.* Seeing exit interview data would be helpful for managers to understand why employees separate
Information about the separation process	Description of the Bureau's separation process. Should NOT be double coded with any of the other codes.

	Example. How exit survey data is used.
Other	Anything that doesn't fit into the other separations codes that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Diversity-specific comments about separations.	Describes an aspect of separations that is specifically related to diverse employees. *Example.* Why minorities specifically separate (e.g., Racial bias, feeling undervalued).
Comment about the participant's personal experience with separation.	Participant described *their own* separation experience. *Example.* Reasons why they have considered separating.
Critical incident related to separations.	Anything particularly interesting or alarming related to separation and diversity & inclusion.
Work Environment/Climate	
	Description and example
Codes	
Positive comment about the work environment/climate.	Described a positive aspect of the work environment/climate within the Bureau. *Example.* Bureau promoted work-life balance; Employees enjoy their jobs and/or identify with the mission.
Negative comment about the work environment/climate.	Described a negative aspect of the work environment/climate within the Bureau. *Example.* Morale is low in general (e.g., impact of the current administration, lack of stability, feeling stuck at a certain level within the organization).
Suggestion of improvement to the work environment/climate.	Suggested something about the work environment/climate that could be improved. *Example.* Decreasing the perception of discrimination.
Information about the work environment/climate.	Description of the Bureau's work environment/climate. Should NOT be double coded with any of the other codes. *Example.* What the work environment of the Bureau is like without emotion.
Other	Anything that doesn't fit into the other codes about work environment/climate that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the	

codes above. Do not code alone.)	
Diversity-specific comments about the work environment/climate.	Describes an aspect of the work environment/climate that is specifically related to diverse employees. *Example.* Discriminatory behavior leading to decreased morale among minorities/women.
Comment about the participant's personal experience with the work environment/climate.	Participant described *their own* experience with work environment/climate. *Example.* Personal experience with work environment or climate in general
Critical incident related to work environment/climate.	Anything particularly interesting or alarming related to diversity & inclusion and work environment/climate that.
Examiner Commissioning Program	
	Description and example
Codes	
Positive comment about the Examiner Commissioning Program.	Described a positive aspect of the Examiner Commissioning Program within the Bureau. *Example.* The ECP has improved since it first began.
Negative comment about the Examiner Commissioning Program.	Described a negative aspect of the Examiner Commissioning Program within the Bureau. *Example.* The commissioning process is unfair in general because the requirements/evaluation are perceived to be subjective (not based on race/ethnicity), assessment outcome depends on personal connections/relationships.
Suggestion of improvement to the Examiner Commissioning Program.	Suggested something about the Examiner Commissioning Program that could be improved. *Example.* Improvements to the evaluations.
Information about the Examiner Commissioning Program.	Description of the Bureau's Examiner Commissioning Program. Should NOT be double coded with any of the other codes. *Example.* How the commissioning process works.
Other	Anything that doesn't fit into the other codes that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the	

codes above. Do not code alone.)	
Diversity-specific comments about the Examiner Commissioning Program.	Describes an aspect of the Examiner Commissioning Program that is specifically related to diverse employees. *Example.* The group of employees who are commissioned is not very diverse
Comment about the participant's personal experience with the Examiner Commissioning Program.	Participant described *their own* Examiner Commissioning Program experience. *Example.* Their process of getting commissioned.
Critical incident related to Examiner Commissioning Program.	Anything particularly interesting or alarming related to diversity & inclusion and the Examiner Commissioning Program.
Perception of Diversity and Inclusion (and Diversity Training)	
	Description and example
Codes	
Positive comment about diversity and inclusion.	Described a positive aspect of diversity and inclusion within the Bureau. *Example.* Positive reaction to diversity training; Diversity and inclusion are valued.
Negative comment about diversity and inclusion.	Described a negative aspect of diversity and inclusion within the Bureau. *Example.* Negative reaction to diversity training; Leadership is not diverse.
Suggestion of improvement to diversity and inclusion.	Suggested something about diversity and inclusion that could be improved. *Example.* How diversity training could be improved.
Information about diversity and inclusion.	Description of the Bureau's diversity and inclusion. Should NOT be double coded with any of the other codes. *Example.* Description of diversity training.
Other	Anything that doesn't fit into the other about diversity and inclusion codes that should still be captured. Should NOT be double coded with one of the other codes.
Flags (Should only be double coded with one of the codes above. Do not code alone.)	
Comment about the participant's personal experience with diversity and inclusion.	Participant described *their own* experience with diversity and inclusion. *Example.* Discrimination they have experienced; their reaction to diversity training.
Critical incident related to diversity and inclusion.	Anything particularly interesting or alarming related to diversity & inclusion.

Appendix I
IDI and Focus Group Results Tables

Executives

Topic Area	
Recruitment	15% (b)(6)
Hiring/Selection	13%
Details	8% (b)(6)
Training and Development	12% (b)(6)
Future Career Paths/ Advancement	19% (b)(6)
Mentoring	8% (b)(6)
Executive Coaching	4%
Separation	6%
Work Environment/Climate	3%
Examiner Commissioning Program	0%
Perception of Diversity and Inclusion	12% (b)(6)
Total	**100%** (b)(6)

Topic Area	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Recruitment	31% (b)(6)	30% (b)(6)	22% (b)(6)	12% (b)(6)	4% (b)(6)	100% (b)(6)
Diversity-specific	81%	85%	80%	25%	0%	72%
Personal Experience	10%	10%	13%	38%	0%	13%
Hiring/Selection	20%	46%	17%	15%	2%	100%
Diversity-specific	33%	48%	50%	11%	0%	39%
Personal Experience	25%	11%	10%	22%	0%	15%
Details	28%	42%	0%	31%	0%	100%
Diversity-specific	30%	13%	0%	0%	0%	14%
Personal Experience	0%	0%	0%	0%	0%	0%
Training and Development	29%	18%	11%	39%	4%	100%
Diversity-specific	13%	20%	33%	5%	0%	13%
Personal Experience	0%	0%	0%	0%	0%	0%
Future Career Paths/ Advancement	19%	45%	15%	19%	2%	100%
Diversity-specific	50%	59%	54%	56%	0%	55%
Personal Experience	6%	3%	0%	19%	0%	6%
Mentoring	24%	21%	12%	41%	3%	100%
Diversity-specific	50%	57%	50%	21%	0%	38%
Personal Experience	25%	14%	25%	36%	0%	26%
Executive Coaching	50%	13%	13%	25%	0%	100%
Diversity-specific	0%	50%	0%	25%	0%	13%

Topic Area	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Personal Experience	63% (b)(6)	50% (b)(6)	50% (b)(6)	25% (b)(6)	0% (b)(6)	50% (b)(6)
Separation	7%	52%	28%	14%	0%	100%
Diversity-specific	100%	73%	63%	25%	0%	66%
Personal Experience	0%	0%	0%	0%	0%	0%
Work Environment/ Climate	(33%	(60%	7%	0%	0%	100%
Diversity-specific	40%	33%	0%	0%	0%	33%
Personal Experience	0%	0%	0%	0%	0%	0%
Examiner Commissioning Program	0%	0%	0%	0%	0%	0%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Perception of Diversity and Inclusion	26%	45%	21%	4%	4%	100%
Personal Experience	0%	8%	0%	0%	0%	4%
Total	25%	37%	16%	20%	2%	100%

Personnel Involved with Recruitment, Selection, or Promotion

Topic Area	
Recruitment	9% (b)(6)
Hiring/Selection	34%
Details	5%
Training and Development	10%
Future Career Paths/ Advancement	19%
Mentoring	4%
Executive Coaching	0%
Separation	6%
Work Environment/Climate	3%
Examiner Commissioning Program	0%
Perception of Diversity and Inclusion	9%
Total	**100**

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Recruitment	7% (b)(6)	0% (b)(6)	7% (b)(6)	71% (b)(6)	14% (b)(6)	100% (b)(6)
Diversity-specific	100%	0%	100%	70%	0%	64%
Personal Experience	0%	0%	0%	0%	0%	0%

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Hiring/Selection	6% (b)(6)	2% (b)(6)	11% (b)(6)	77% (b)(6)	4% (b)(6)	100% (b)(6)
Diversity-specific	67%	100%	0%	34%	0%	32%
Personal Experience	33	0%	0%	5%	0%	6%
Details	0%	13%	13%	75%	0%	100%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	17%	0%	13%
Training and Development	13%	19%	6%	63%	0%	100%
Diversity-specific	0%	0%	0%	10%	0%	6%
Personal Experience	0%	33%	0%	10%	0%	13%
Future Career Paths/ Advancement	10%	13%	10%	67%	0%	100%
Diversity-specific	33%	0%	33%	25%	0%	23%
Personal Experience	0%	25%	0%	5%	0%	7%
Mentoring	0%	14%	29%	57%	0%	100%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Executive Coaching	0%	0%	0%	0%	0%	0%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Separation	10%	40%	20%	30%	0%	100%
Diversity-specific	100%	50%	50%	33%	0%	50%
Personal Experience	0%	0%	0%	0%	0%	0%
Work Environment/ Climate	25%	50%	25%	0%	0%	100%
Diversity-specific	100%	0%	0%	0%	0%	25%
Personal Experience	0%	0%	0%	0%	0%	0%
Examiner Commissioning Program	0%	0%	0%	0%	0%	0%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Perception of Diversity and Inclusion	29%	21%	29%	21%	0%	100%

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Personal Experience	1 (b)(6)	0% (b)(6)	0% (b)(6)	0% (b)(6)	0% (b)(6)	1 (b)(6)
Total	10% (b)(6)	12% (b)(6)	13% (b)(6)	62% (b)(6)	3% (b)(6)	100% (b)(6)

Focus Groups: Black employees (non-Examiners)

Topic Area	
Recruitment	6% (b)(6)
Hiring/Selection	13%
Details	7%
Training and Development	8%
Future Career Paths/ Advancement	24%
Mentoring	5%
Executive Coaching	0%
Separation	9%
Work Environment/Climate	24%
Examiner Commissioning Program	0%
Perception of Diversity and Inclusion	4%
Total	**100%** (b)(6)

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Recruitment	9% (b)(6)	61% (b)(6)	9% (b)(6)	22% (b)(6)	0% (b)(6)	100% (b)(6)
Diversity-specific	50%	64%	100%	60%	0%	65%
Personal Experience	50%	29%	0%	20%	0%	26%
Hiring/Selection	8%	65%	10%	14%	4%	100%
Diversity-specific	100%	61%	40%	14%	0%	53%
Personal Experience	75%	52%	20%	43%	0%	47%
Details	7%	62%	3%	24%	3%	100%
Diversity-specific	0%	39%	0%	0%	0%	24%
Personal Experience	50%	28%	0%	29%	0%	28%
Training and Development	35%	56%	3%	6%	0%	100%
Diversity-specific	33%	26%	0%	0%	0%	26%
Personal Experience	50%	53%	0%	100%	0%	53%
Future Career Paths/	8%	75%	5%	11%	0%	100%

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Advancement						
Diversity-specific	25% (b)(6)	44% (b)(6)	60% (b)(6)	0% (b)(6)	0% (b)(6)	38% (b)(6)
Personal Experience	38%	21%	0%	27%	0%	22%
Mentoring	11% (b)(6)	37% (b)(6)	16% (b)(6)	37% (b)(6)	0% (b)(6)	100% (b)(6)
Diversity-specific	50%	0%	0%	0%	0%	5%
Personal Experience	0%	29%	0%	43%	0%	26%
Executive Coaching	0%	0%	0%	0%	0%	0%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Separation	0%	84%	0%	16%	0%	100%
Diversity-specific	0%	23%	0%	50%	0%	27%
Personal Experience	0%	0%	0%	0%	0%	0%
Work Environment/ Climate	8%	84%	3%	3%	2%	100%
Diversity-specific	38%	26%	67%	0%	0%	27%
Personal Experience	25%	7%	0%	0%	50%	9%
Examiner Commissioning Program	0%	0%	0%	0%	0%	0%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Perception of Diversity and Inclusion	18%	71%	12%	0%	0%	100%
Personal Experience	33%	25%	0%	0%	0%	24%
Total	10%	71%	5%	12%	1%	100%

Focus Groups: Hispanic Employees (non-Examiners)

Topic Area	
Recruitment	2% (b)(6)
Hiring/Selection	13%
Details	5%
Training and Development	11%
Future Career Paths/ Advancement	19%
Mentoring	6%
Executive Coaching	0%

Topic Area		
Separation	9%	(b)(6)
Work Environment/Climate	30%	
Examiner Commissioning Program	0%	
Perception of Diversity and Inclusion	5%	
Total	**100**	

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Recruitment	14% (b)(6)	43% (b)(6)	29% (b)(6)	14% (b)(6)	0% (b)(6)	100% (b)(6)
Diversity-specific	100%	100%	100%	0%	0%	86%
Personal Experience	0%	33%	0%	0%	0%	14%
Hiring/ Selection	4%	67%	6%	20%	4%	100%
Diversity-specific	0%	8%	0%	9%	0%	7%
Personal Experience	100%	33%	33%	18%	50%	33%
Details	18%	45%	14%	23%	0%	100%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	50%	30%	0%	20%	0%	27%
Training and Development	21%	38%	4%	36%	0%	100%
Diversity-specific	10%	0%	50%	0%	0%	4%
Personal Experience	40%	6%	0%	12%	0%	15%
Future Career Paths/ Advancement	7%	55%	6%	32%	0%	100%
Diversity-specific	33%	24%	20%	8%	0%	20%
Personal Experience	0%	7%	0%	4%	0%	5%
Mentoring	12%	40%	12%	32%	4%	100%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	100%	40%	0%	0%	0%	28%
Executive Coaching	0%	0%	0%	100%	0%	100%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	100%	0%	100%
Separation	11%	75%	0%	14%	0%	100%
Diversity-specific	0%	7%	0%	60%	0%	14%
Personal	0%	4%	0%	0%	0%	3%

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Experience						
Work Environment/ Climate	10% (b)(6)	77% (b)(6)	1% (b)(6)	10% (b)(6)	2% (b)(6)	100% (b)(6)
Diversity-specific	23%	42%	100%	46%	0%	40%
Personal Experience	31%	15%	100%	0%	0%	15%
Examiner Commissioning Program	0 (	100%	0%	0%	0%	100%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Perception of Diversity and Inclusion	0%	67%	10%	24%	0%	100%
Personal Experience	0%	7%	0%	0%	0%	5%
Total	10%	62%	5%	22%	1%	100%

Focus Groups: Examiners (Black & Hispanic)

Topic Area	
Recruitment	3% (b)(6)
Hiring/Selection	15%
Details	4%
Training and Development	6%
Future Career Paths/ Advancement	17%
Mentoring	2%
Executive Coaching	0%
Separation	6%
Work Environment/Climate	18%
Examiner Commissioning Program	24%
Perception of Diversity and Inclusion	3%
Total	**100%** (b)(6)

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Recruitment	22% (b)(6)	33% (b)(6)	44% (b)(6)	0% (b)(6)	0% (b)(6)	100% (b)
Diversity-specific	100%	67%	100%	0%	0%	89% (

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Personal Experience	50% (b)(6)	0% (b)(6)	0% (b)(6)	0% (b)(6)	0% (b)(6)	11% (b)(6)
Hiring/Selection	16%	63%	19%	2%	0%	100%
Diversity-specific	14%	22%	75%	0%	0%	30%
Personal Experience	71%	44%	0%	0%	0%	40%
Details	9%	55%	18%	18%	0%	100%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	33%	0%	50%	0%	27%
Training and Development	26%	37%	32%	5%	0%	100%
Diversity-specific	0%	14%	33%	0%	0%	16%
Personal Experience	60%	0%	0%	0%	0%	16%
Future Career Paths/ Advancement	6%	66%	22%	6%	0%	100%
Diversity-specific	33%	21%	55%	0%	0%	28%
Personal Experience	0%	6%	9%	33%	0%	8%
Mentoring	(29%	29%	29%	14%	0%	100%
Diversity-specific	50%	0%	100%	0%	0%	43%
Personal Experience	100%	50%	50%	0%	0%	57%
Executive Coaching	0%	0%	0%	0%	0%	0%
Diversity-specific	0%	0%	0%	0%	0%	0%
Personal Experience	0%	0%	0%	0%	0%	0%
Separation	16%	84%	0%	0%	0%	100%
Diversity-specific	0%	6%	0%	0%	0%	5%
Personal Experience	0%	0%	0%	0%	0%	0%
Work Environment/ Climate	28%	63%	7%	2%	0%	100%
Diversity-specific	13%	21%	25%	0%	0%	19%
Personal Experience	7%	6%	0%	0%	0%	6%
Examiner Commissioning Program	14%	58%	11%	17%	0%	100%
Diversity-specific	20%	14%	13%	25%	0%	17%
Personal	30%	24%	38%	17%	0%	25%

	Positive	Negative	Suggestion	Information	Other	Total in Topic Area
Experience						
Perception of Diversity and Inclusion	20% (b)(6)	40% (b)(6)	10% (b)(6)	30% (b)(6)	0% (b)(6)	100% (b)(6)
Personal Experience	0%	25%	0%	0%	0%	10%
Total	17%	59% (	16%	8% (	0%	100% (b)(6)

*'s indicate some of the post-session survey results were coded into the category

Appendix J
Recommendations

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

Recommendation	Source	Priority Level
(b)(5)		

cfpb Consumer Financial Protection Bureau

Consumer Financial Protection Bureau
Office of Minority and Women Inclusion (OMWI)

Diversity Fact Book

August 13, 2020

This is the date that this document was provided to the FOIA team, not the date that this document was provided to CFPB.

Deloitte.

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CFPB Workforce:

Ethnicity Diversity Analysis

Workforce Composition
Distribution by Ethnicity & Minority Group
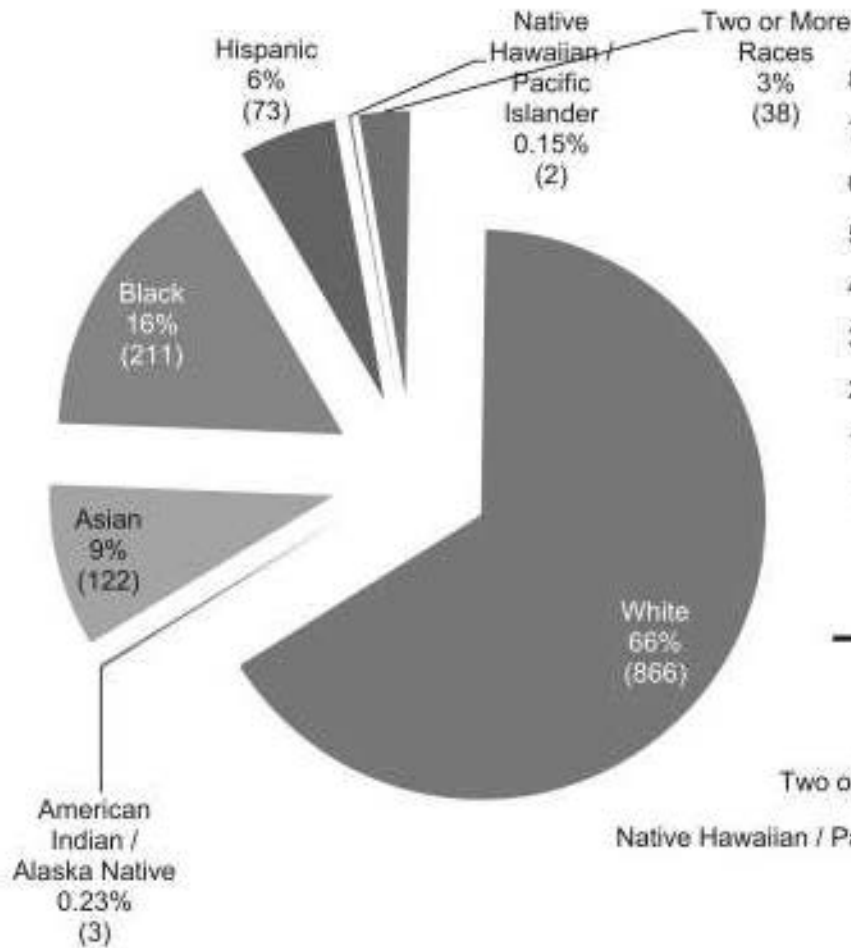
FY2013 YTD Ethnicity Distribution

Hispanic
6%
(73)

Native
Hawaiian /
Pacific
Islander
0.15%
(2)

Two or More
Races
3%
(38)

Black
16%
(211)

Asian
9%
(122)

White
66%
(866)

American
Indian /
Alaska Native
0.23%
(3)

FY2011-FY2013 YTD Minority / Non-Minority Onboard Workforce

66%
(454)

68%
(753)

66%
(866)

34%
(229)

32%
(357)

34%
(449)

80%
70%
60%
50%
40%
30%
20%
10%
0%

FY2011   FY2012   FY2013 YTD

—◆— Minority   —■— Non-Minority

FY2013 YTD Minority Workforce Distribution by Ethnicity

Two or More Races — 8% (38)

Native Hawaiian / Pacific Islander — 0.45% (2)

Hispanic — 16% (73)

Black — 47% (211)

Asian — 27% (122)

American Indian / Alaska Native — 0.67% (3)

0%   50%   100%

4
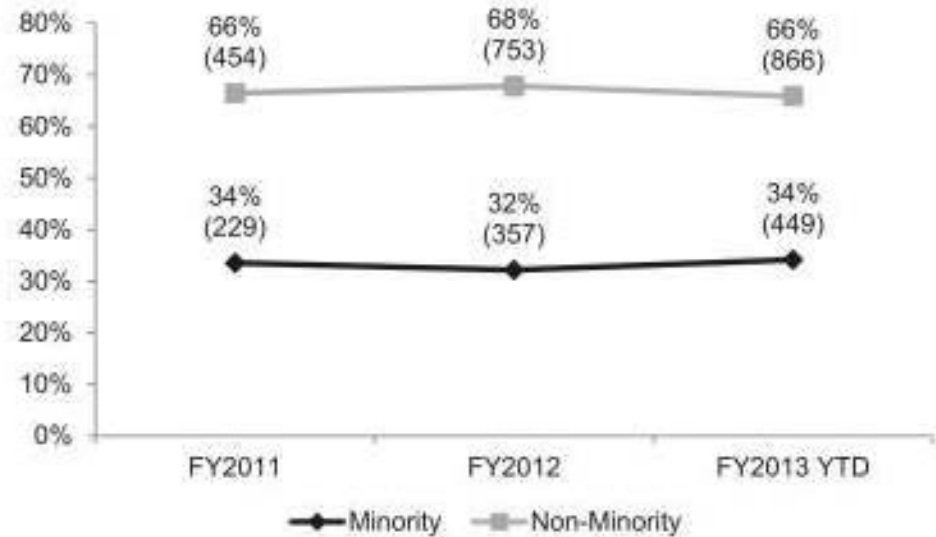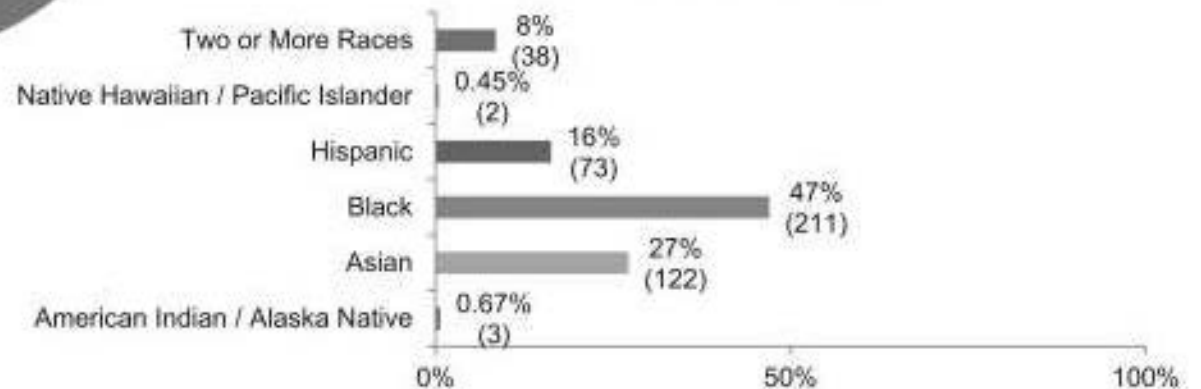
Workforce Composition
CFPB compared to the Civilian Labor Force (CLF)

FY2013 YTD Onboard Workforce by Gender & Ethnicity

■ Female   ⬚ Civilian Labor Force - Female   ■ Male   ⬚ Civilian Labor Force - Male

5
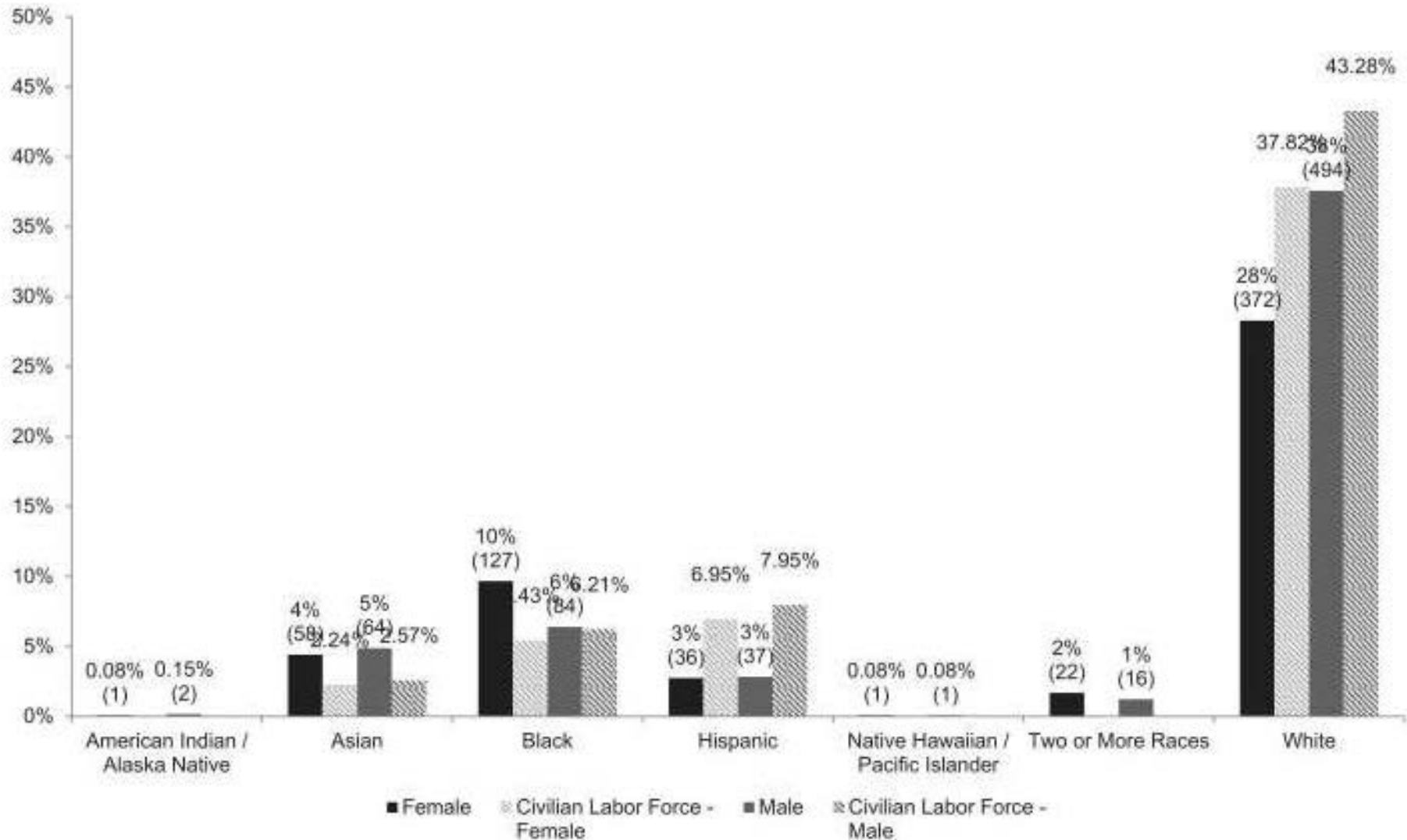
Workforce Composition
Trends in Average Salary Distribution by Ethnicity & Pay Band

FY2011 Average Salary Distribution by Ethnicity & Pay Band
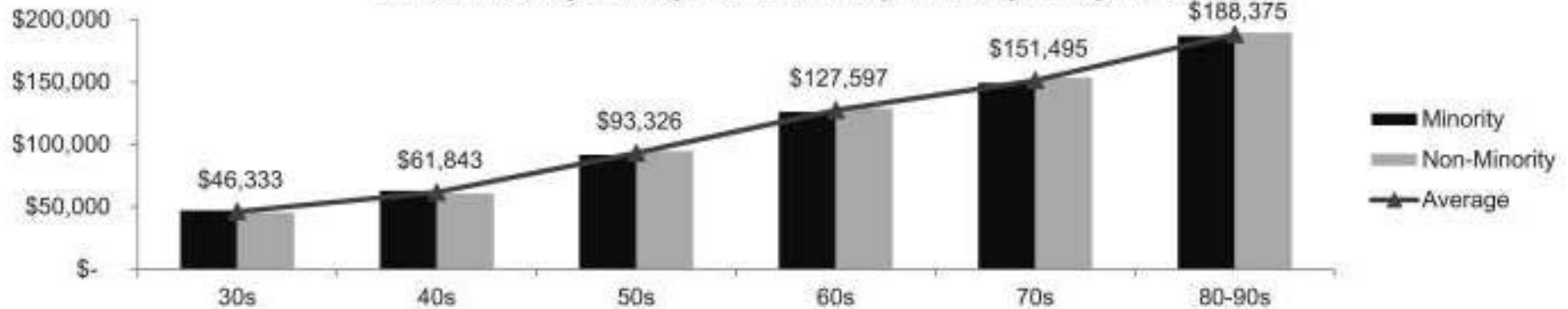
FY2012 Average Salary Distribution by Ethnicity & Pay Band
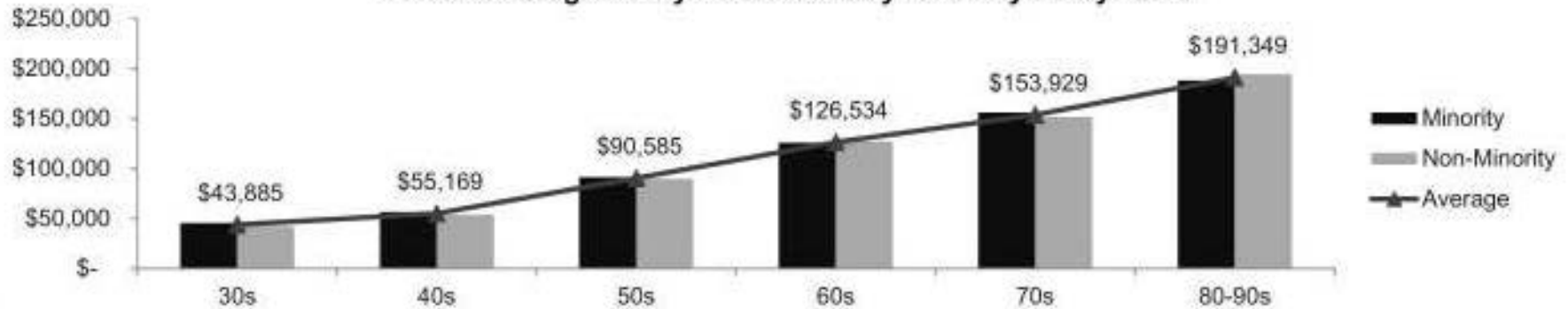
FY2013 YTD Average Salary Distribution by Ethnicity & Pay Band
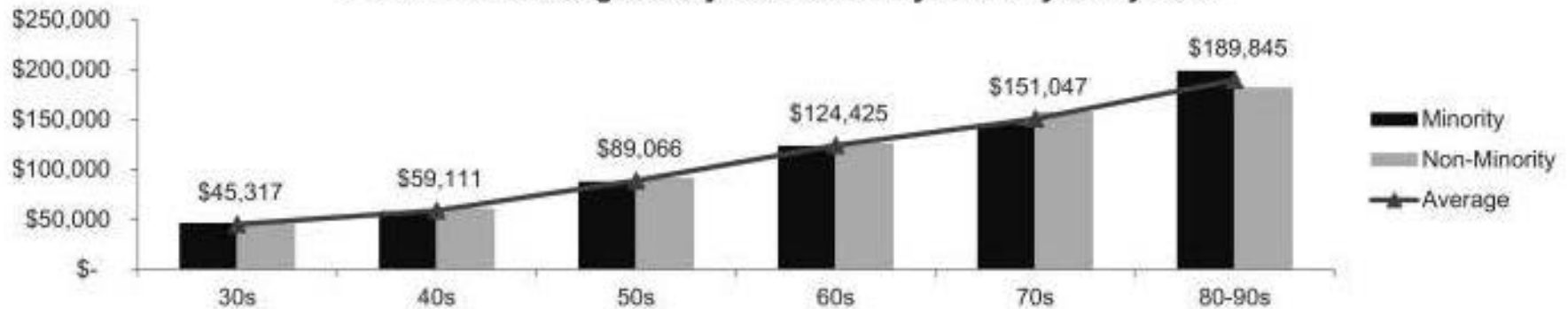
Recruitment & Hiring Analysis
Trends in Hiring by Age & Ethnicity

FY2011 Ethnicity Hiring Trend

American Indian / Alaska Native ■ Asian ■ Black ■ Hispanic ■ Native Hawaiian / Pacific Islander ■ Two or More Races ■ White
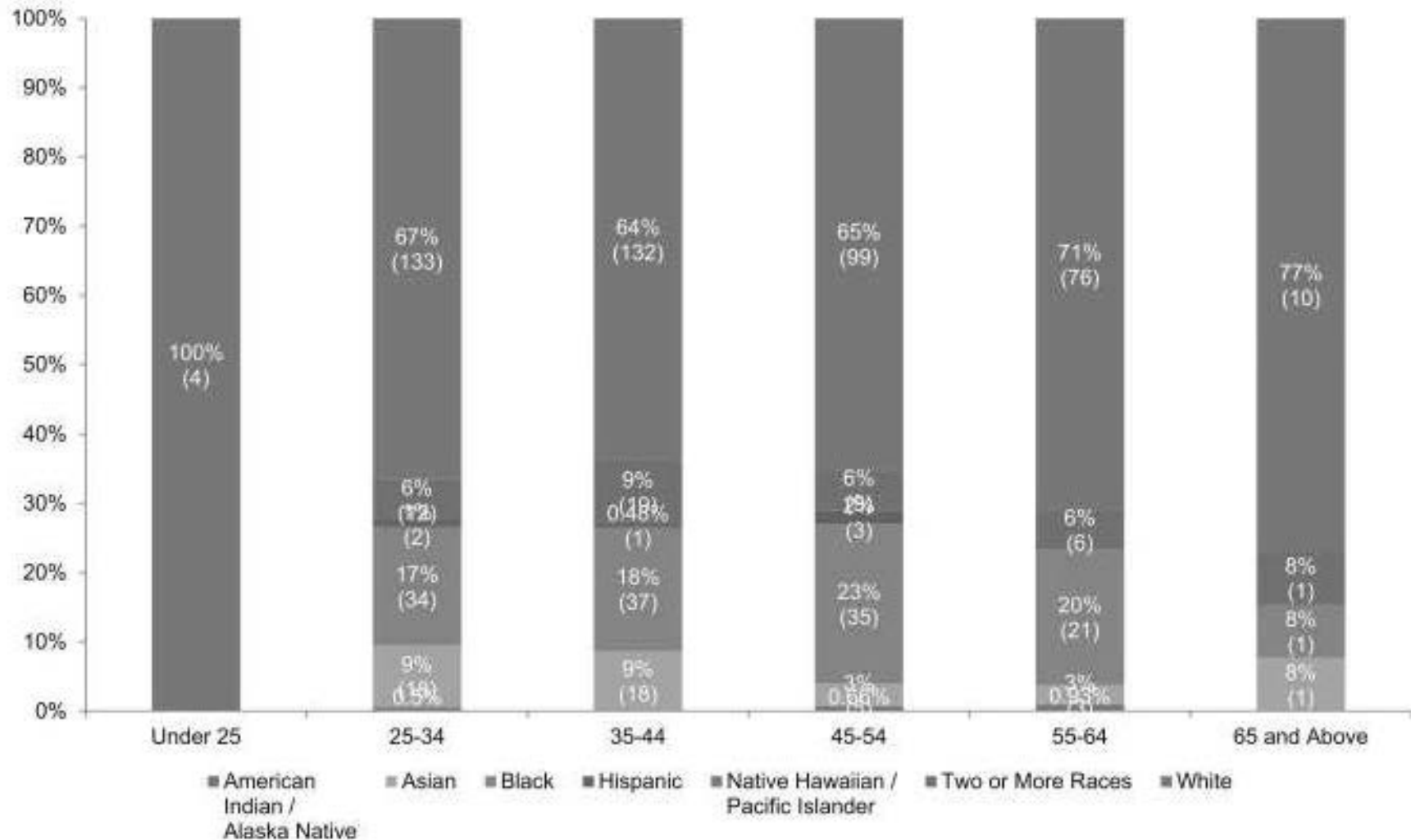
Recruitment & Hiring Analysis

Trends in Hiring by Age & Ethnicity

FY2012 Ethnicity Hiring Trend

American Indian / Alaska Native ■ Asian ■ Black ■ Hispanic ■ Native Hawaiian / Pacific Islander ■ Two or More Races ■ White
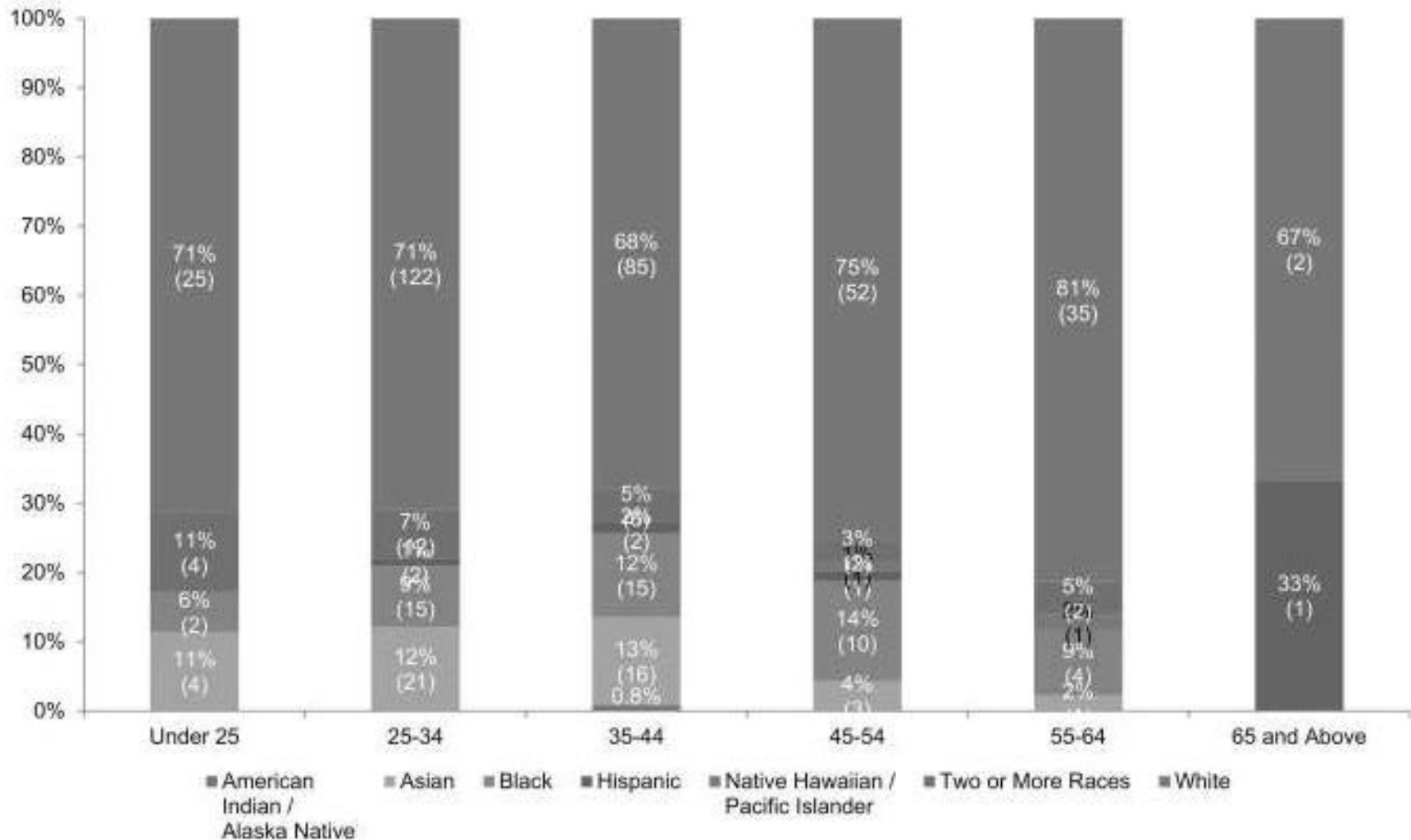
Recruitment & Hiring Analysis
Trends in Hiring by Age & Ethnicity

FY2013 YTD Ethnicity Hiring Trend
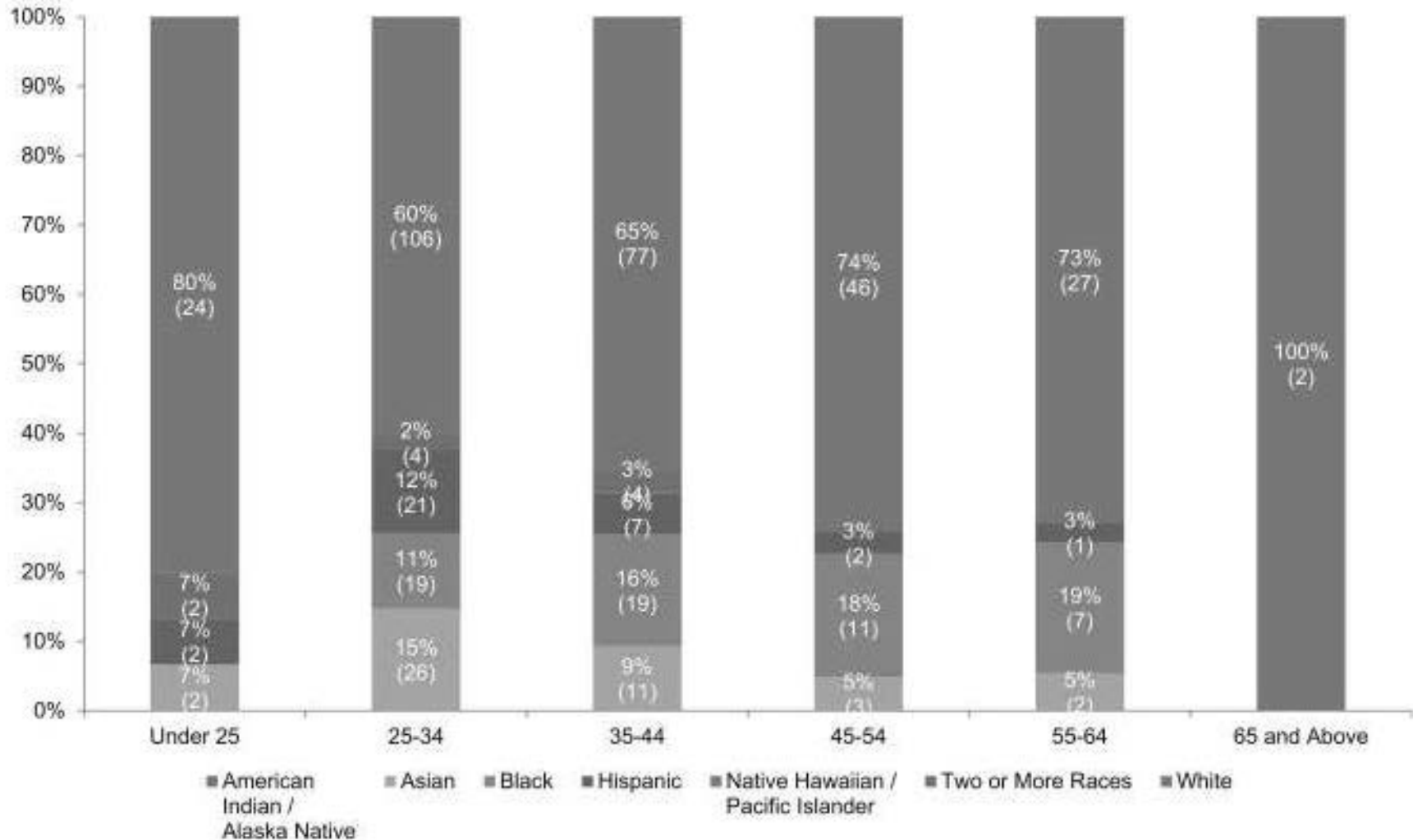
Recruitment & Hiring Analysis
Applicant Flow by Ethnicity

FY2013 YTD Applicant Flow by Ethnicity
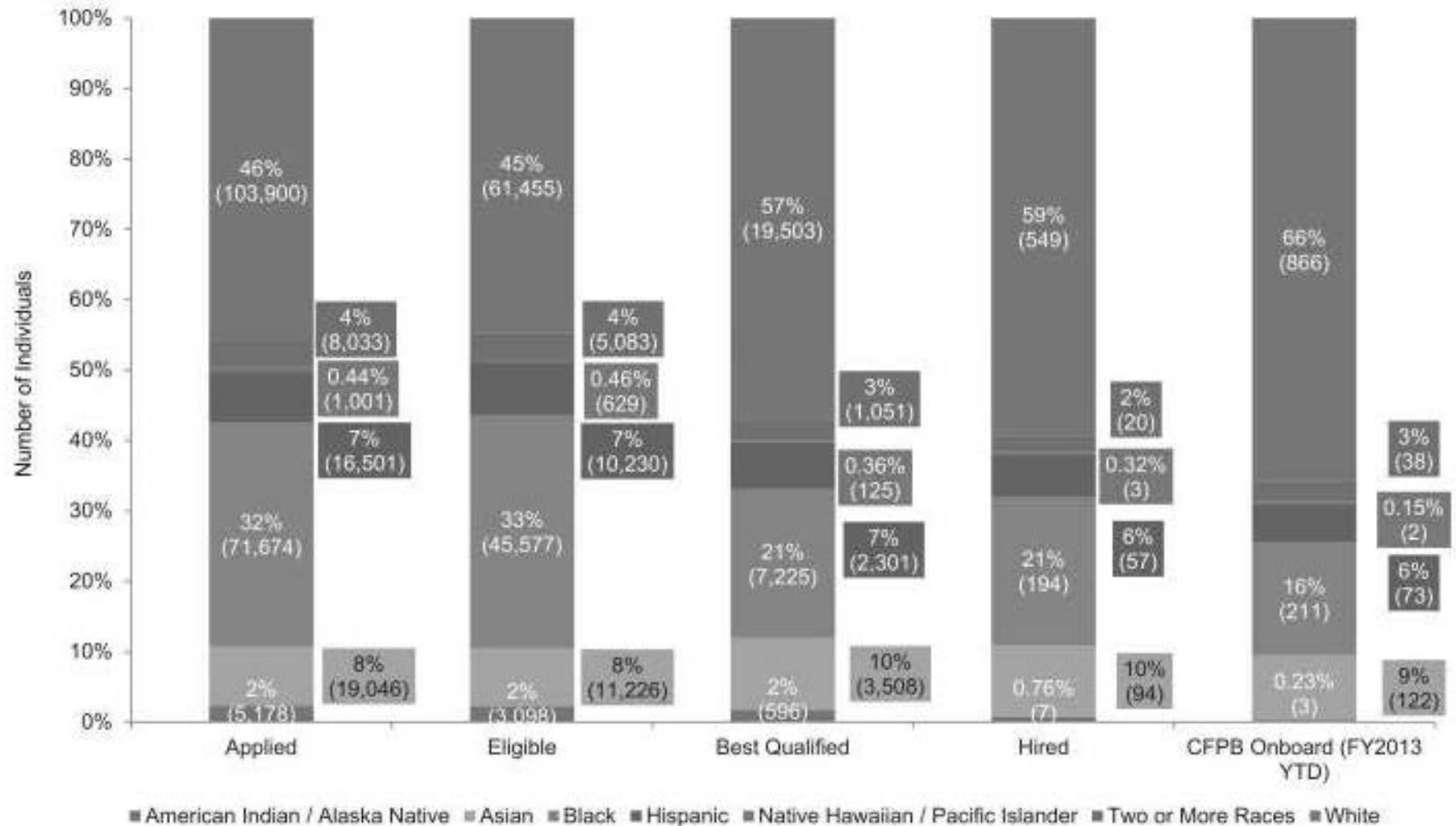
American Indian / Alaska Native ■ Asian ■ Black ■ Hispanic ■ Native Hawaiian / Pacific Islander ■ Two or More Races ■ White

Recruitment & Hiring Analysis
Trends in Minority Hiring & Hiring by Ethnicity

FY2011-FY2013 YTD Minority Hiring

Minority   Non-Minority
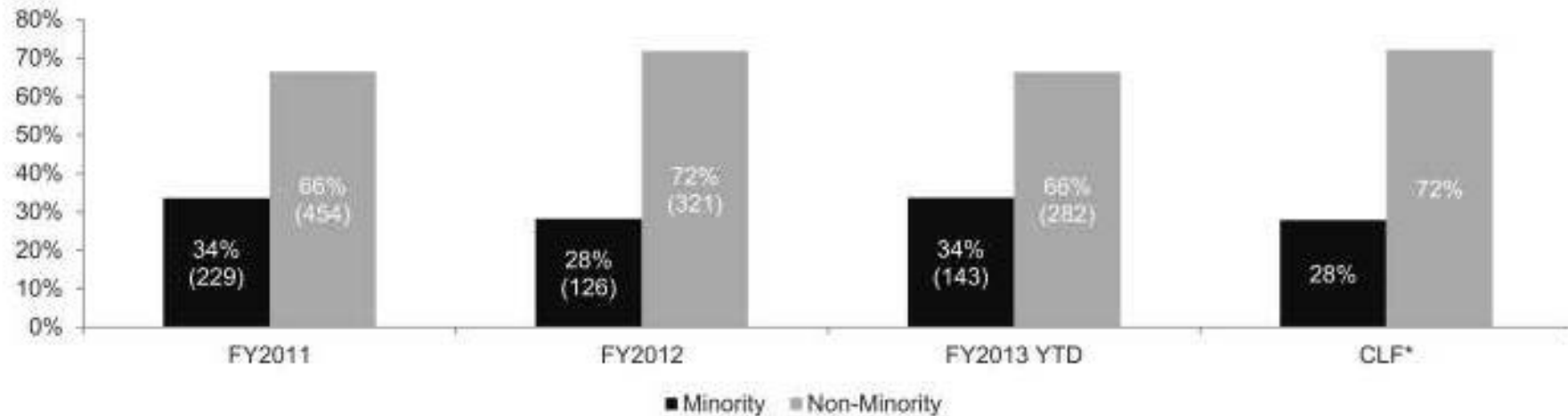
FY2011-FY2013 YTD Hiring by Ethnicity

Attrition Analysis
Trends in Minority Attrition

FY2011-FY2013 YTD Attrition by Minority Status

16%
14%
12%
10%
8%
6%
4%
2%
0%

14% (101)

11% (49) 10% (90)

8% (28)

3% (15)

0.87% (2)

FY2011 FY2012 FY2013 YTD

■ Minority ■ Non-Minority

FY2011-FY2013 YTD Types of Attrition for Minorities

120%
100%
80%
60%
40%
20%
0%

100% (2)

79% (22)

63% (31)

27% (13)

11% 7% (2)

6% 4% (3) (2)

4% (1)

FY2011 FY2012 FY2013 YTD

◆ Involuntary ■ Retirement ▲ Voluntary ■ Other
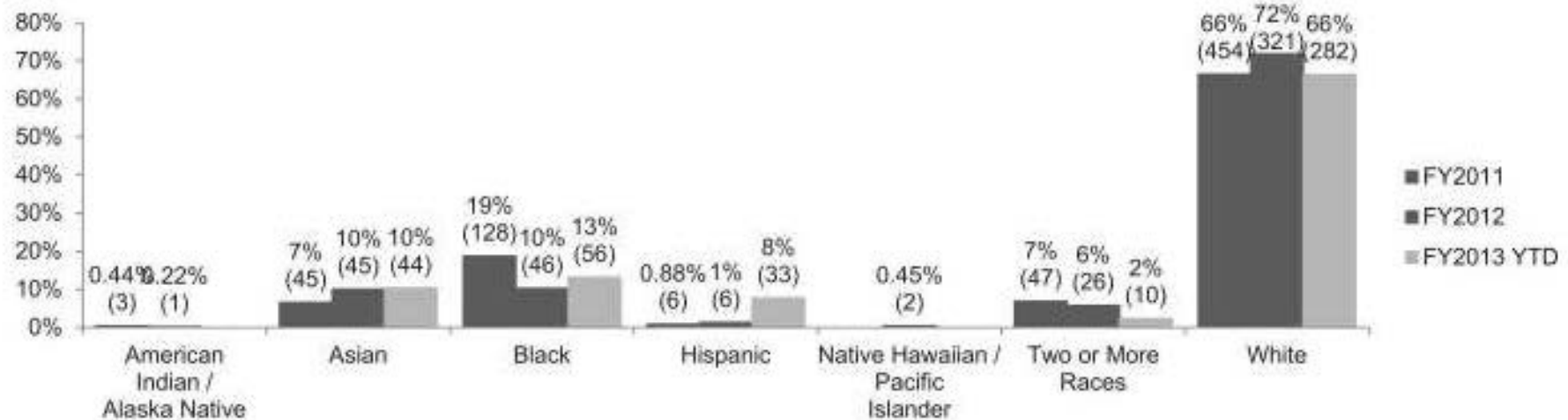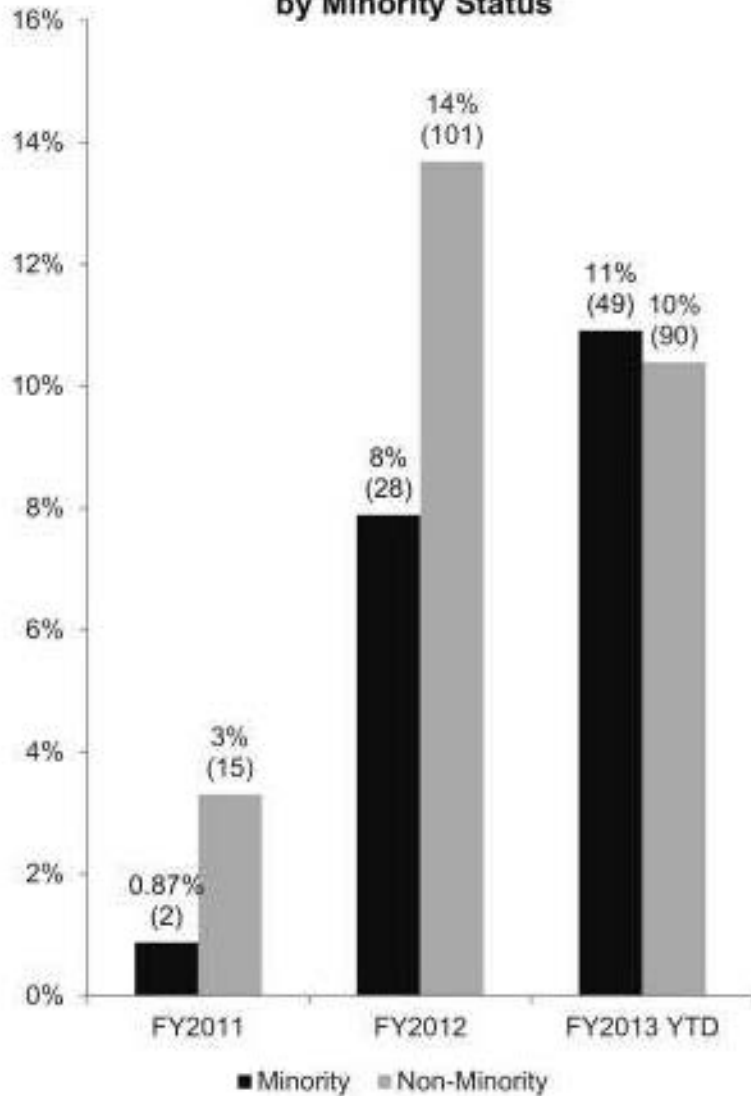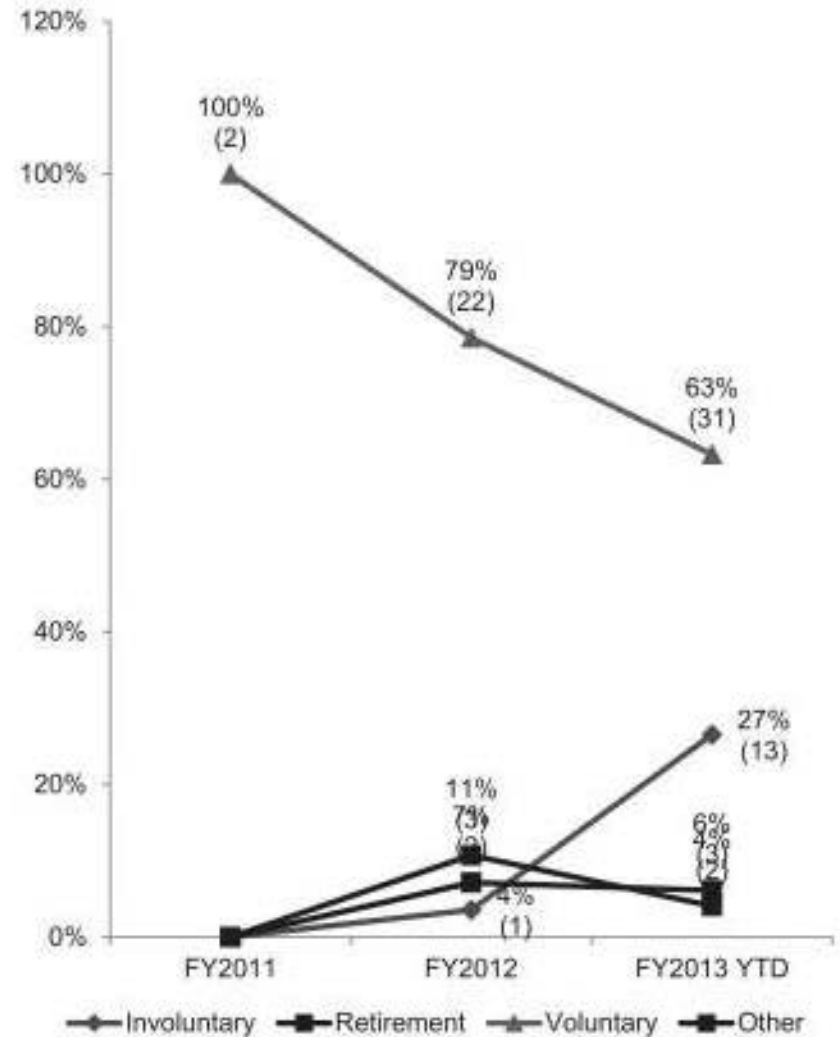
Attrition Analysis
FY2011 Attrition by Ethnicity

FY2011 Attrition by Ethnicity & Pay Band

Legend: American Indian / Alaska Native, Asian, Black, Hispanic, Native Hawaiian / Pacific Islander, Two or More Races, White
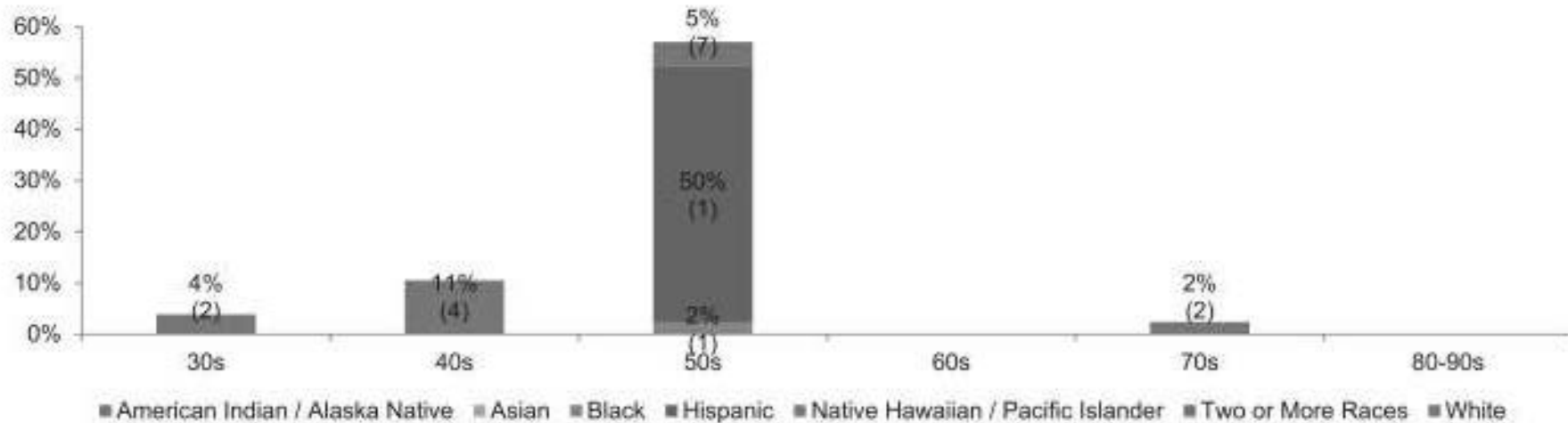
FY2011 Type of Attrition by Ethnicity

Legend: Involuntary, Retirement, Voluntary, Other
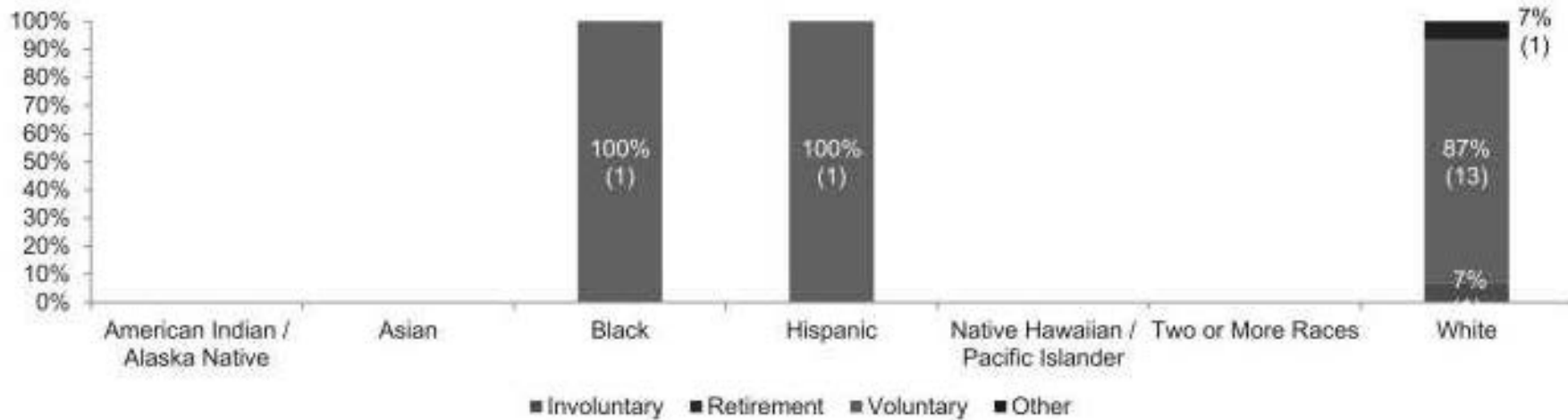
Attrition Analysis
FY2012 Attrition by Ethnicity

FY2012 Attrition by Ethnicity & Pay Band

Legend: American Indian / Alaska Native ■ Asian ■ Black ■ Hispanic ■ Native Hawaiian / Pacific Islander ■ Two or More Races ■ White
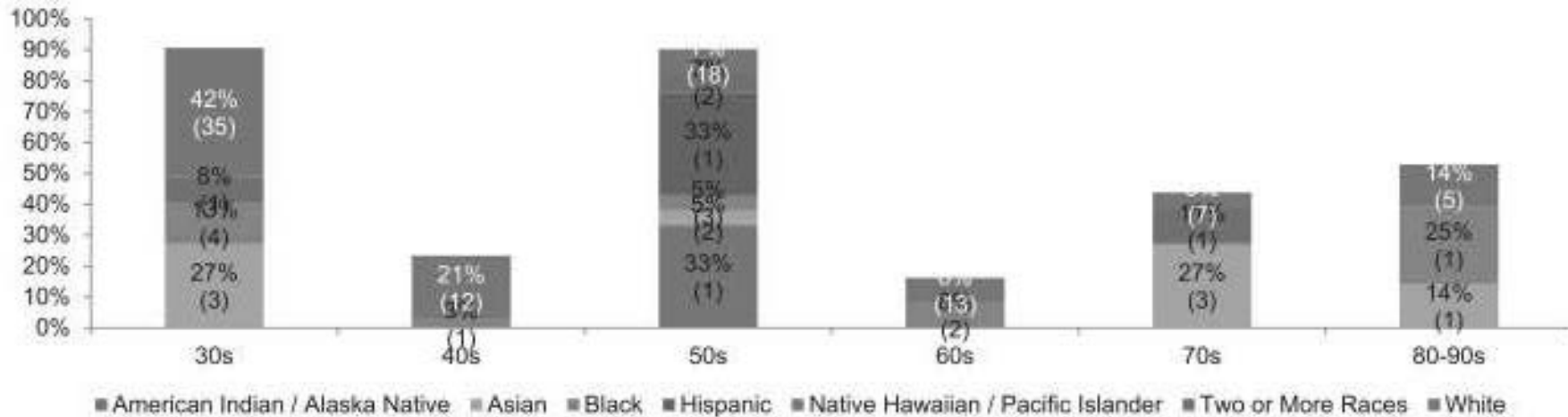
FY2012 Type of Attrition by Ethnicity

Legend: ■ Involuntary ■ Retirement ■ Voluntary ■ Other
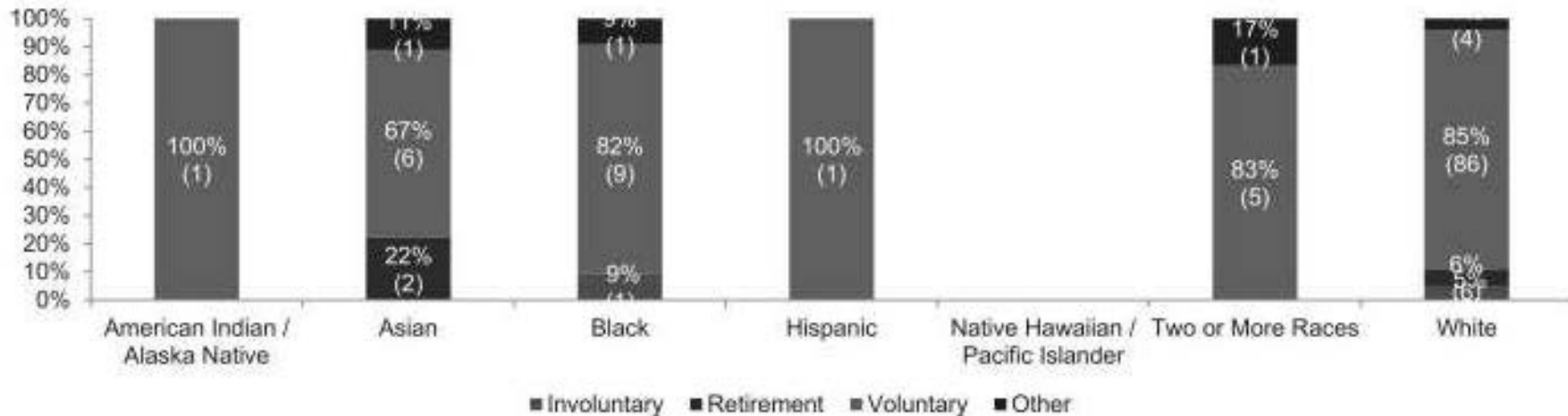
Attrition Analysis
FY2013 YTD Attrition by Ethnicity

FY2013 YTD Attrition by Ethnicity & Pay Band

American Indian / Alaska Native ■ Asian ■ Black ■ Hispanic ■ Native Hawaiian / Pacific Islander ■ Two or More Races ■ White
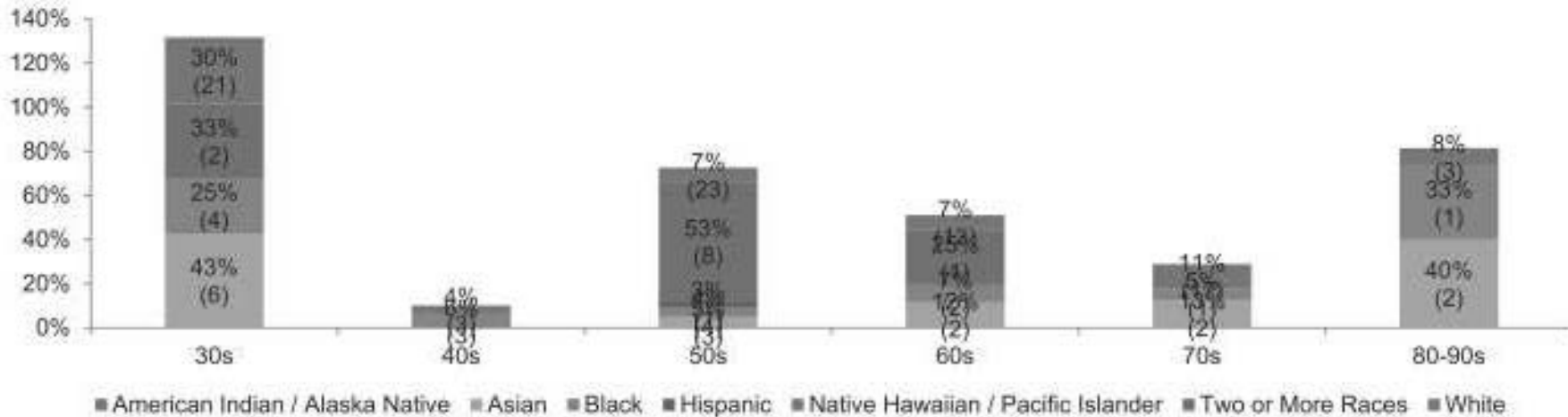
FY2013 YTD Type of Attrition by Ethnicity

■ Involuntary ■ Retirement ■ Voluntary ■ Other
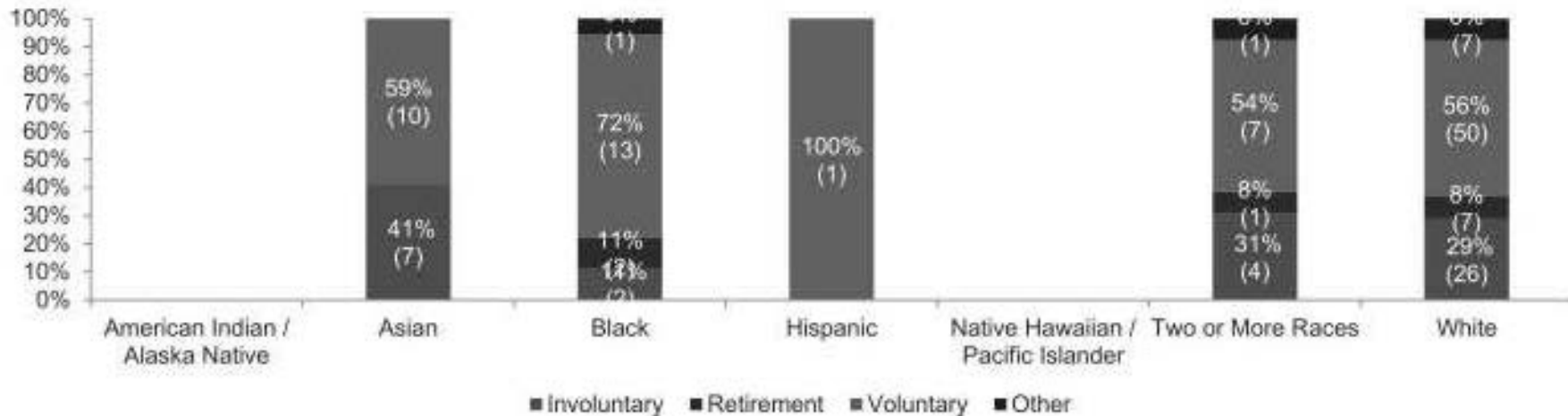
CFPB Workforce:
Gender Diversity Analysis

Workforce Composition
Distribution by Gender

FY2011-FY2013 YTD Workforce Gender Distribution

FY2011
47% (321)
53% (362)

FY2012
49% (545)
51% (565)

FY2013 YTD
47% (617)
53% (698)

■ Female ■ Male

FY2013 YTD Workforce Gender Breakdown

Female
47% (617)
46.64% CLF
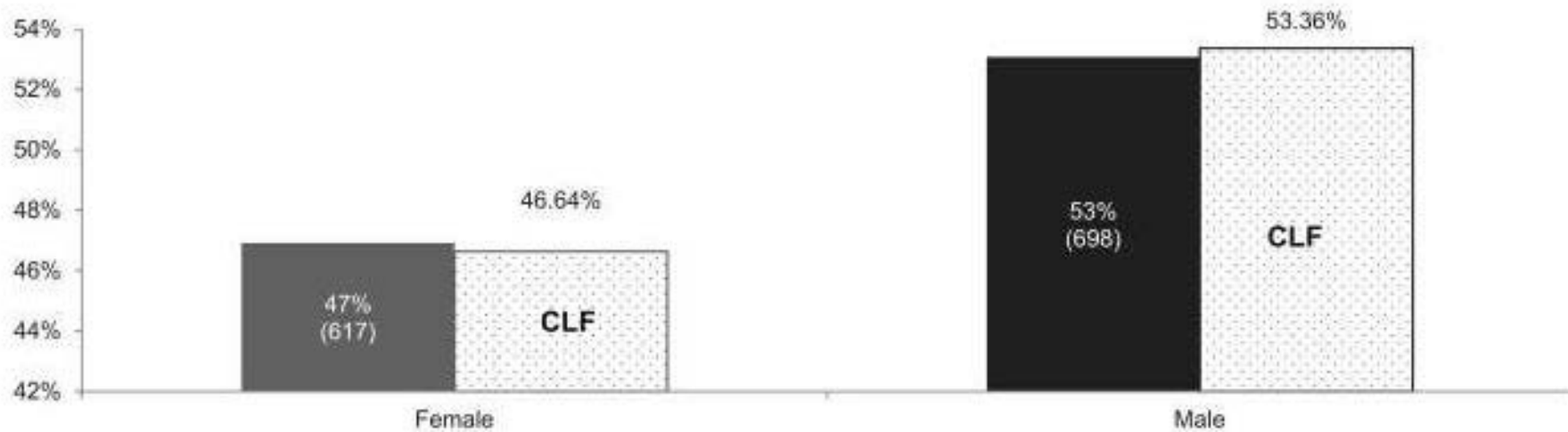
Male
53% (698)
53.36% CLF

Workforce Composition
Age & Pay Band Distribution by Gender
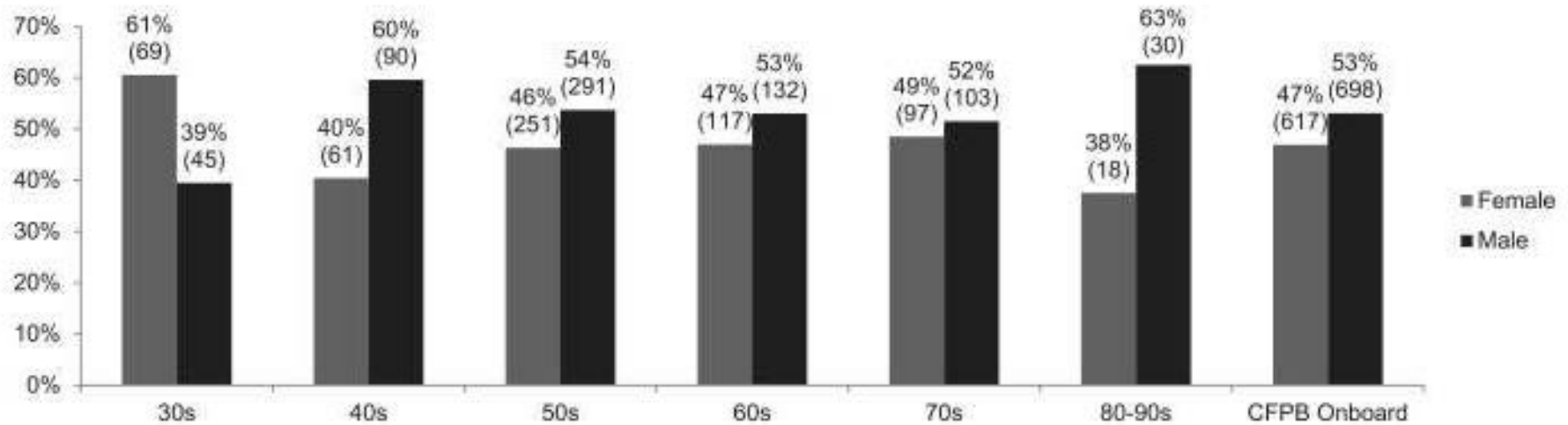
FY2013 YTD Pay Band Distribution by Gender

- Female
- Male

FY2013 YTD Age Distribution by Gender
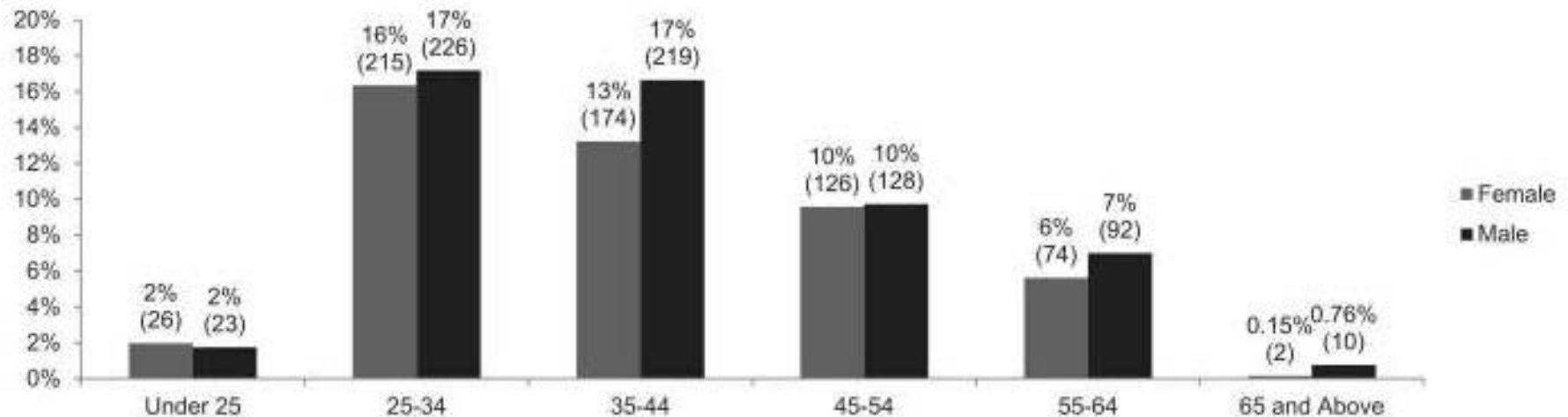
- Female
- Male

Recruitment & Hiring Analysis
Trends in Hiring by Age & Gender

Female Hiring Trend

Legend: FY2011, FY2012, FY2013 YTD, Average

Age	FY2011	FY2012	FY2013 YTD
Under 25	0.93% (3)	7% (16)	10% (17)
25-34	32% (104)	43% (102)	37% (65)
35-44	26% (84)	28% (66)	28% (50)
45-54	23% (73)	13% (31)	18% (31)
55-64	16% (52)	9% (20)	8% (14)
65 and Above	2% (5)		

Male Hiring Trend

Legend: FY2011, FY2012, FY2013 YTD, Average

Age	FY2011	FY2012	FY2013 YTD
Under 25	0.28% (1)	9% (19)	5% (13)
25-34	27% (96)	33% (70)	45% (111)
35-44	34% (123)	28% (59)	27% (68)
45-54	22% (79)	18% (38)	13% (31)
55-64	15% (55)	11% (23)	9% (23)
65 and Above	2% (8)	1% (3)	0.81% (2)
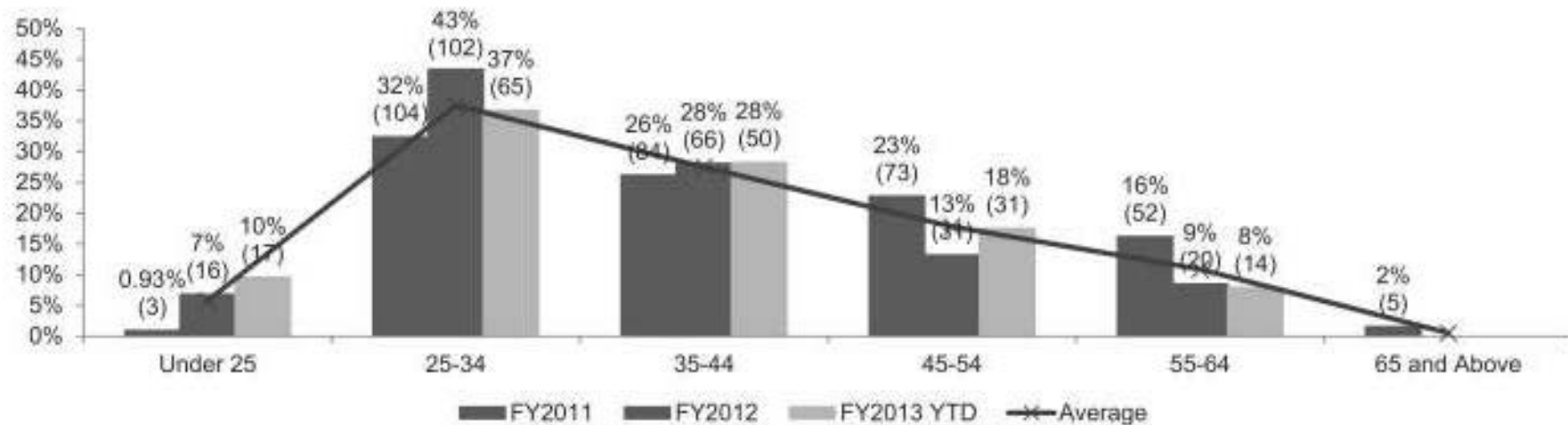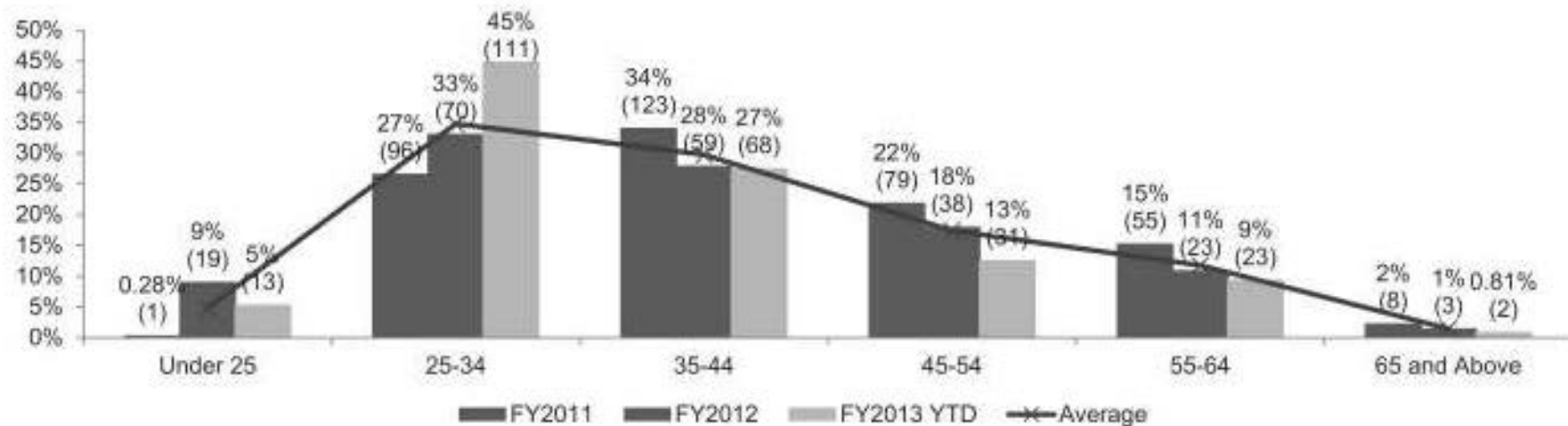
Workforce Composition
Comparison of Gender Average Salaries

FY2011 Gender Average Salaries Comparison by Pay Band

Pay Band	Female	Male
30s	$47,193	$45,165
40s	$63,630	$60,365
50s	$93,261	$94,102
60s	$127,317	$129,267
70s	$153,849	$151,704
80-90s	$189,704	$188,901
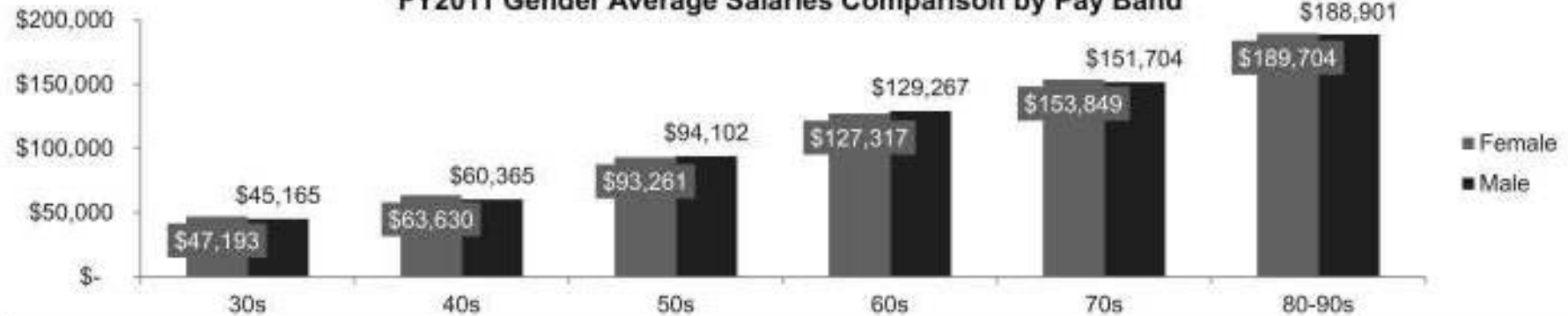
FY2012 Gender Average Salaries Comparison by Pay Band

Pay Band	Female	Male
30s	$43,536	$42,850
40s	$54,807	$55,309
50s	$89,686	$90,824
60s	$122,599	$130,781
70s	$150,612	$155,306
80-90s	$189,948	$193,308
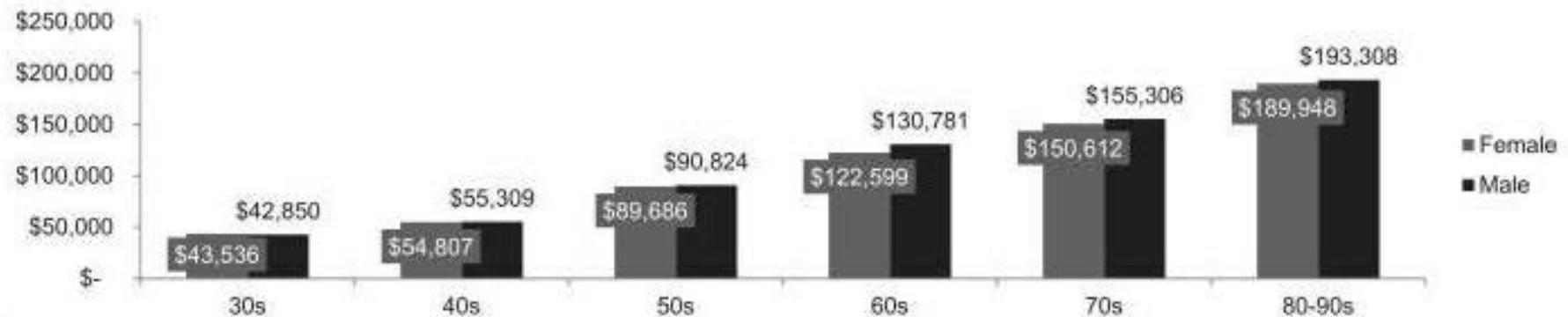
FY2013 YTD Gender Average Salaries Comparison by Pay Band
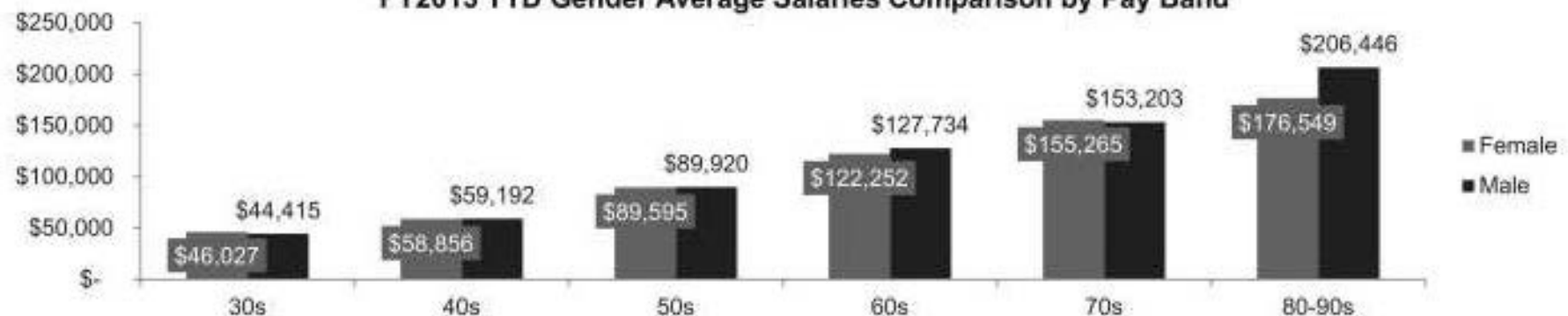
Pay Band	Female	Male
30s	$46,027	$44,415
40s	$58,856	$59,192
50s	$89,595	$89,920
60s	$122,252	$127,734
70s	$155,265	$153,203
80-90s	$176,549	$206,446

Recruitment & Hiring Analysis
Trends in Hiring by Gender

FY2013 YTD Hiring by Gender

42%
(177)

58%
(248)

■ Female ■ Male

FY2011-FY2013 YTD Hiring Distribution by Gender

53.%
(362)

52.7%
(682)

50.86%
(565)

49.14%
(546)

47.%
(321)

47.3%
(612)
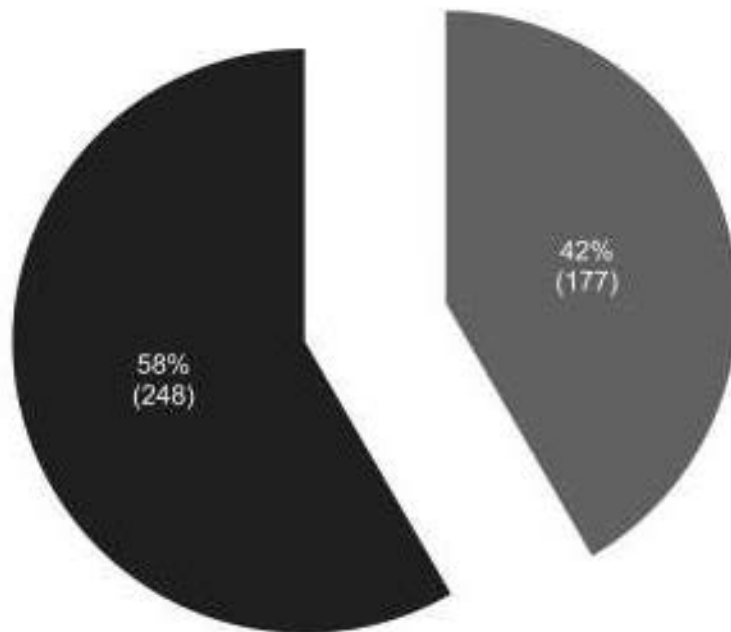
FY2011   FY2012   FY2013
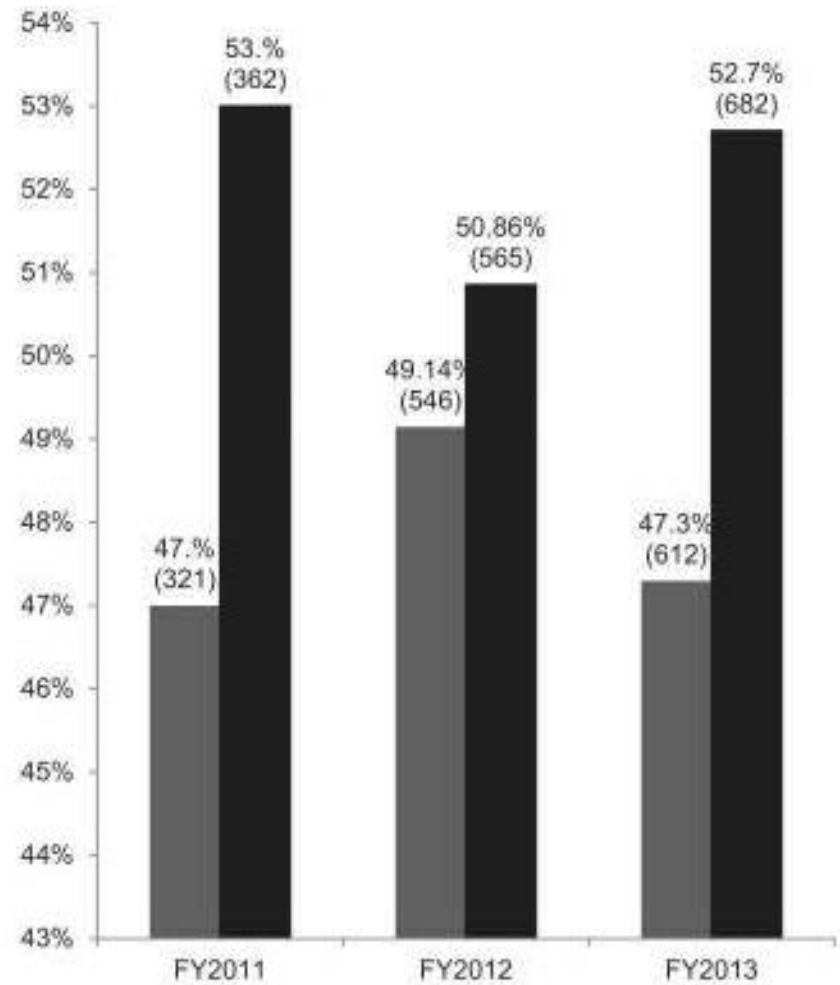
■ Female ■ Male

Recruitment & Hiring Analysis
Applicant Flow by Gender

FY2013 YTD Applicant Flow by Gender
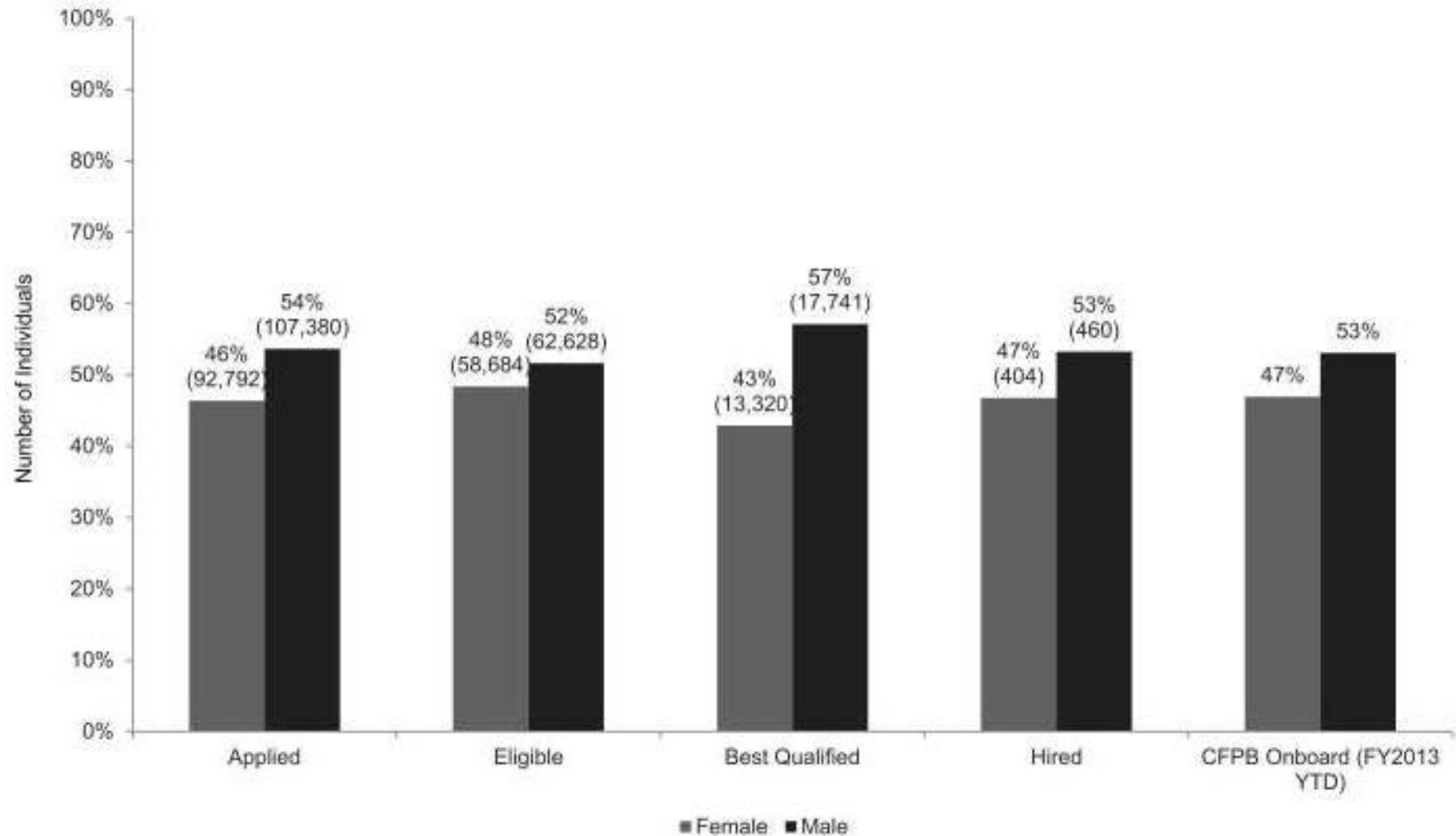
Legend: Female Male

Attrition Analysis
Trends in Attrition by Gender

FY2011–FY2013 YTD Attrition Rates by Gender

■ Female ■ Male
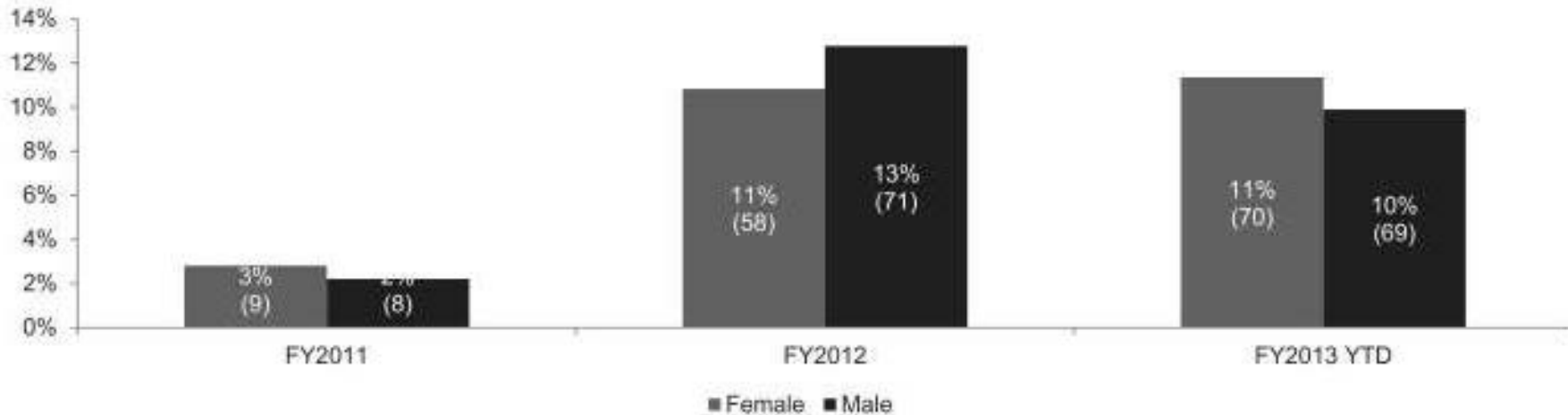
FY2011 Types of Attrition by Gender

■ Female ■ Male

23
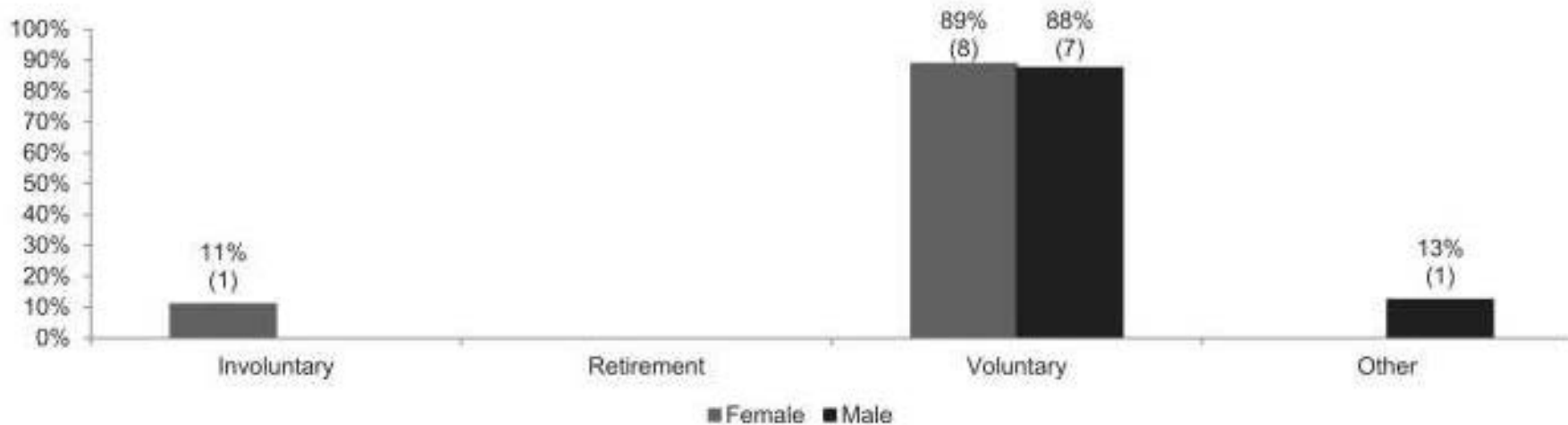
Attrition Analysis
Trends in Attrition by Gender

FY2012 Types of Attrition by Gender

Involuntary: Female 5% (3), Male 4% (3)
Retirement: Female 9% (5), Male 4% (3)
Voluntary: Female 83% (48), Male 85% (60)
Other: Female 3% (2), Male 7% (5)

■ Female ■ Male

FY2013 YTD Types of Attrition by Gender

Involuntary: Female 29% (20), Male 28% (19)
Retirement: Female 7% (5), Male 7% (5)
Voluntary: Female 56% (39), Male 61% (42)
Other: Female 9% (6), Male 4% (3)

■ Female ■ Male
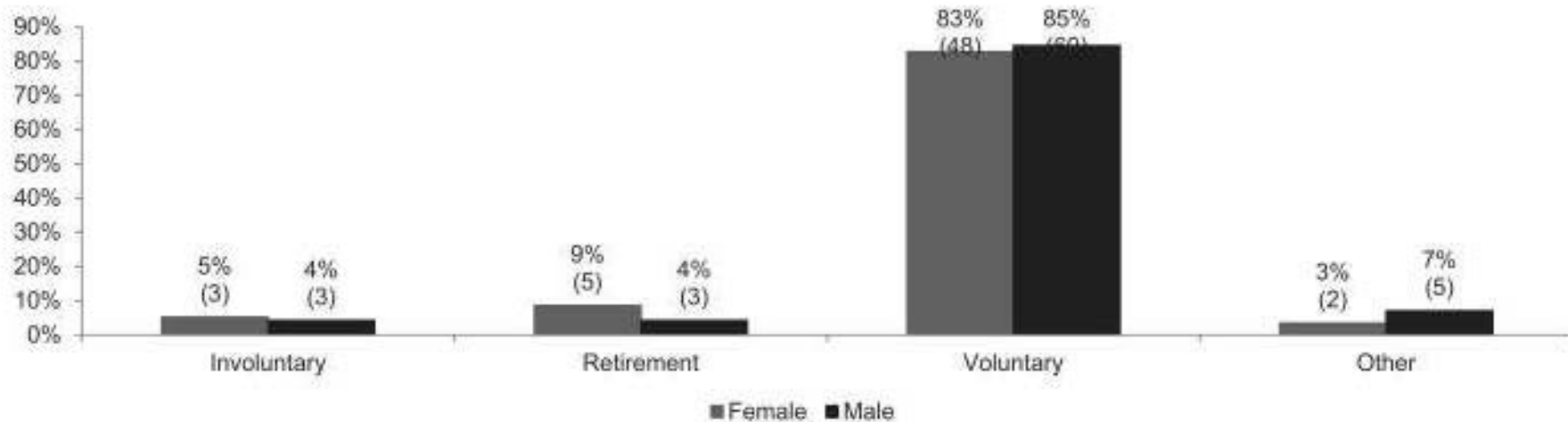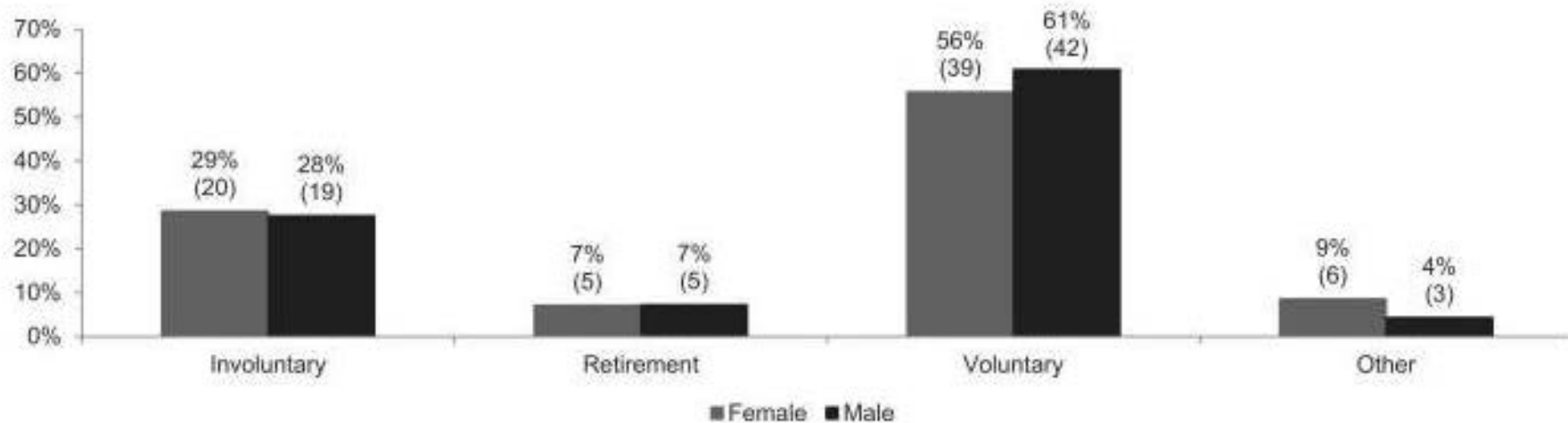
CFPB Workforce:

Performance Management Analysis

Overview
Demographic Group Averages

FY2012 Performance Management Scores
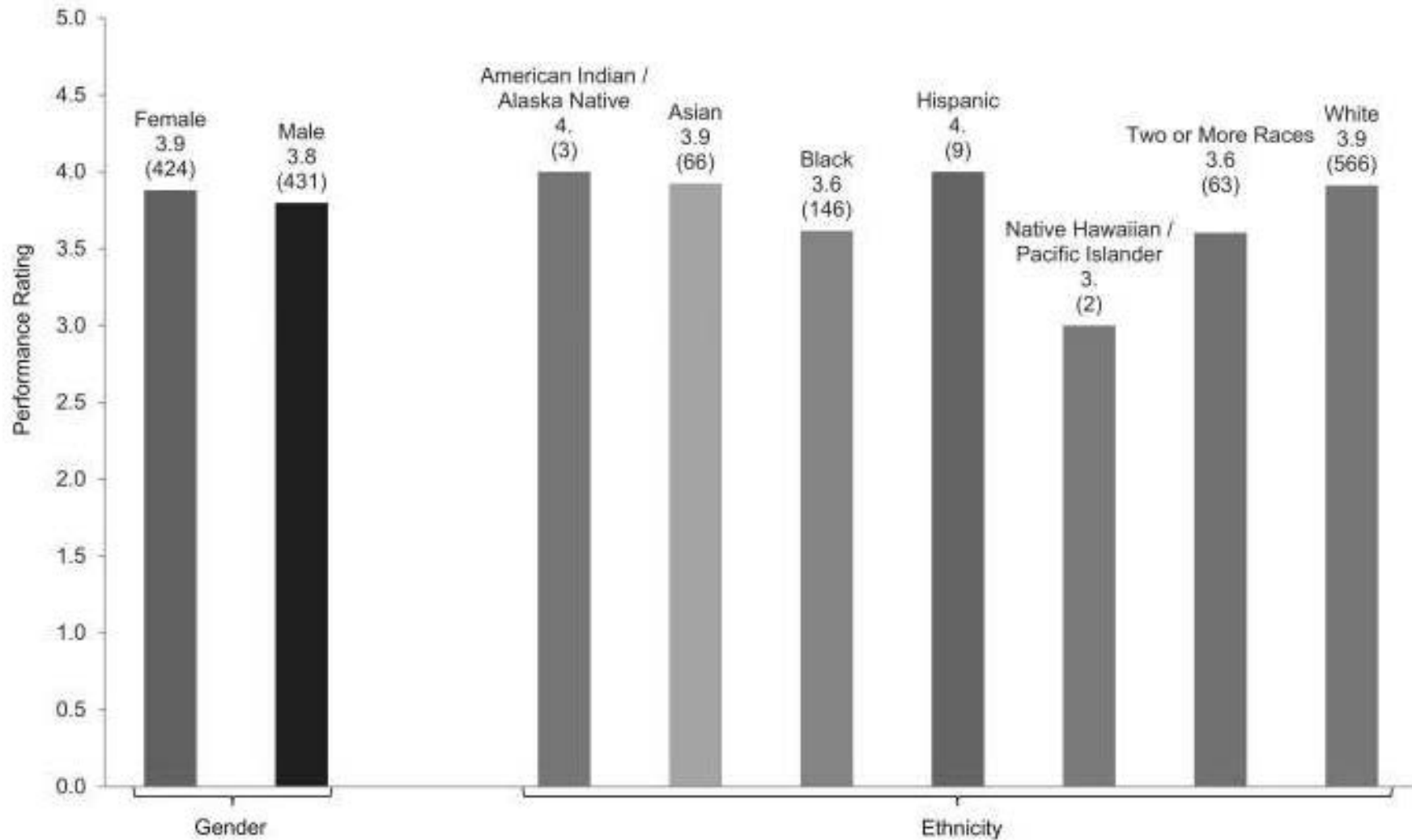
Overall
Rating Distribution by Ethnicity

FY2012 Rating Distribution by Ethnicity
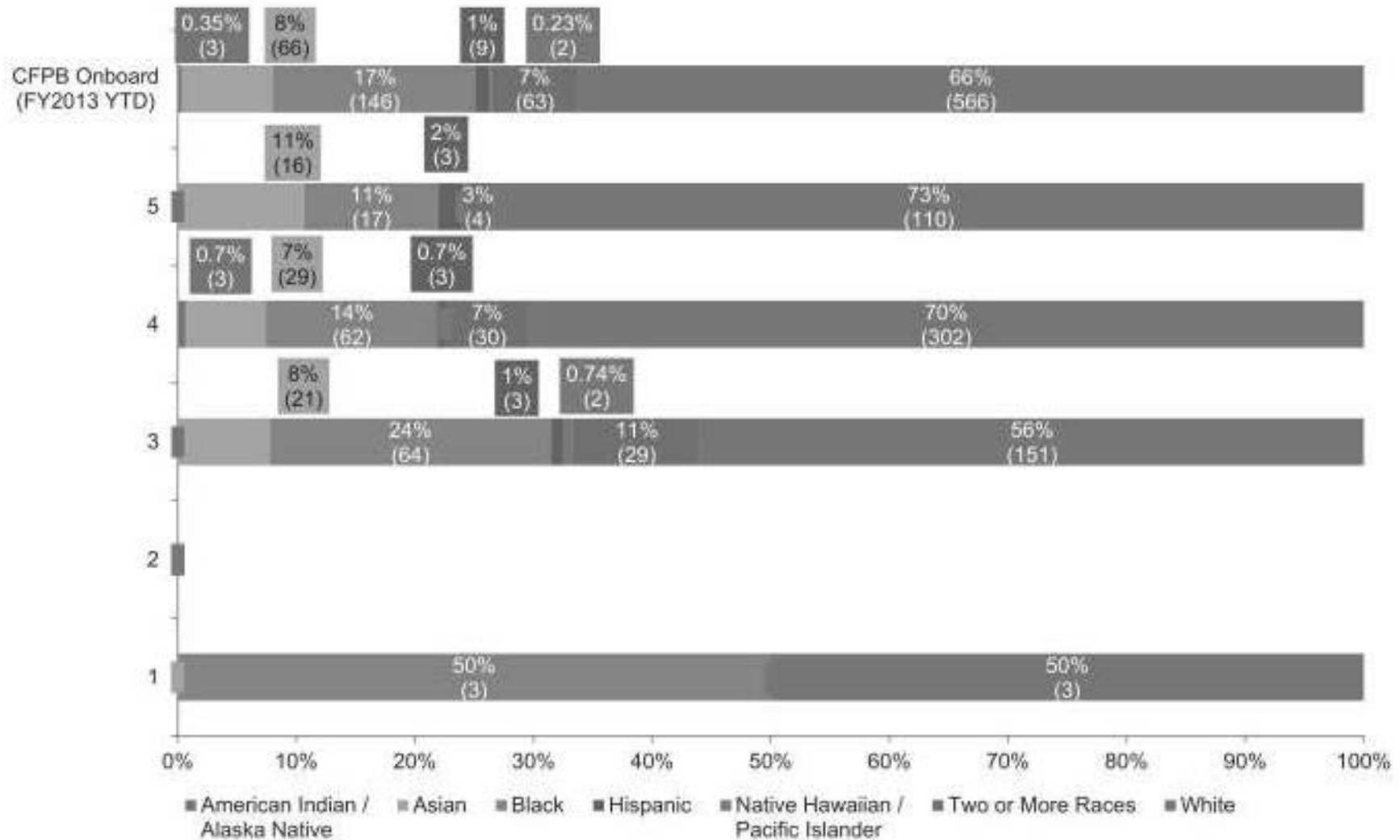
Overall
Rating Distribution by Gender

FY2012 Rating Distribution by Gender

- 1: Female 67% (4), Male 33% (2)
- 3: Female 44% (119), Male 56% (151)
- 4: Female 52% (221), Male 48% (208)
- 5: Female 53% (80), Male 47% (70)
- CFPB Onboard (FY2013 YTD): Female 47% (617), Male 53% (698)

■ Female ■ Male
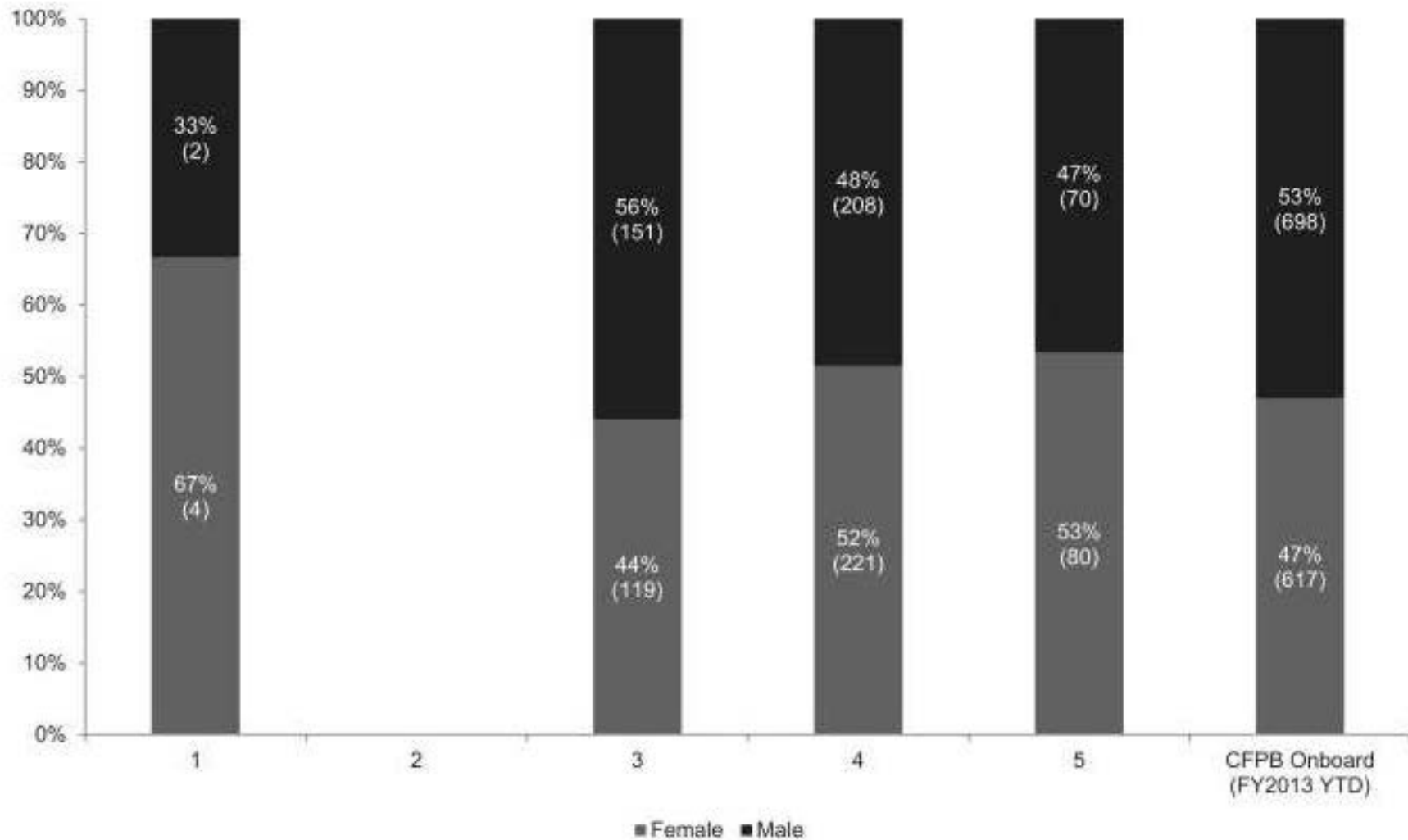
CFPB Workforce:

Division Diversity Analysis

EK22   Main 6 organizations
            Kohn, Evan, 7/12/2013

Workforce Composition
Operations: Distribution by Ethnicity & Minority Group
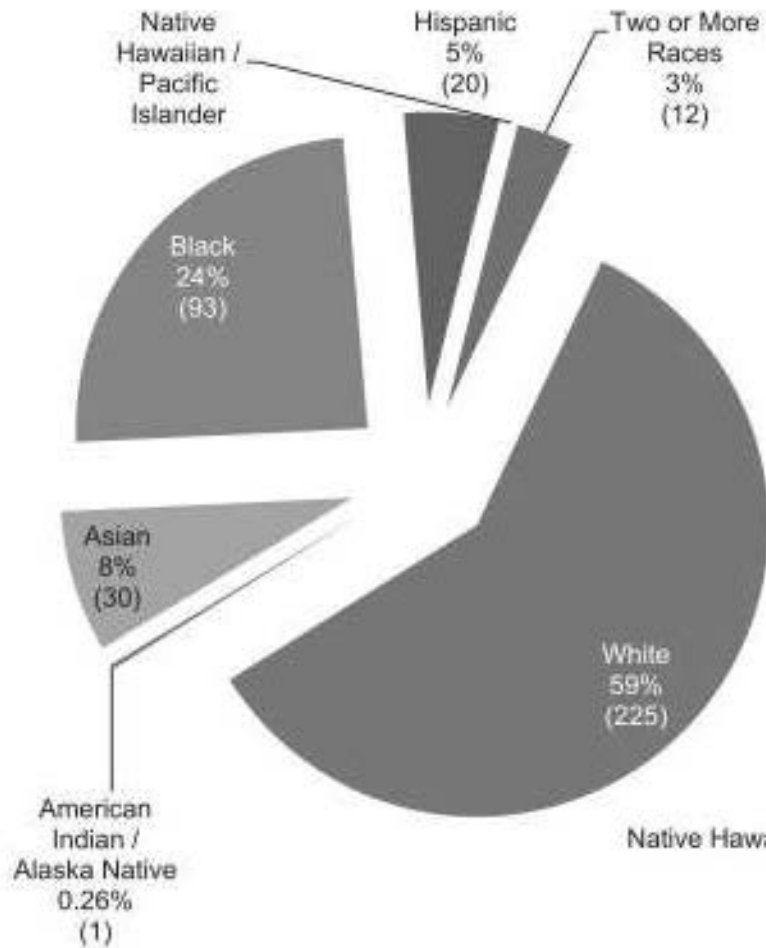
FY2013 YTD Ethnicity Distribution

Native Hawaiian / Pacific Islander

Hispanic 5% (20)

Two or More Races 3% (12)

Black 24% (93)

Asian 8% (30)

White 59% (225)

American Indian / Alaska Native 0.26% (1)

FY2011-FY2013 YTD Minority / Non-Minority Onboard Workforce

53% (93)

59% (179)

59% (225)

47% (84)

41% (122)

41% (156)

FY2011   FY2012   FY2013 YTD

—◆— Minority   —■— Non- Minority

FY2013 YTD Minority Workforce Distribution by Ethnicity

Two or More Races — 8% (12)

Native Hawaiian / Pacific Islander

Hispanic — 13% (20)

Black — 60% (93)

Asian — 19% (30)

American Indian / Alaska Native — 0.64% (1)

0%   50%   100%
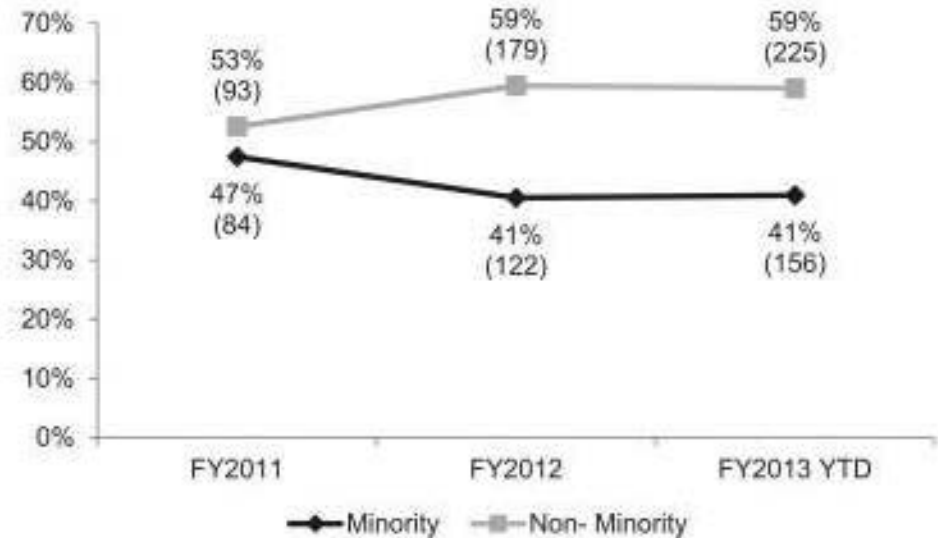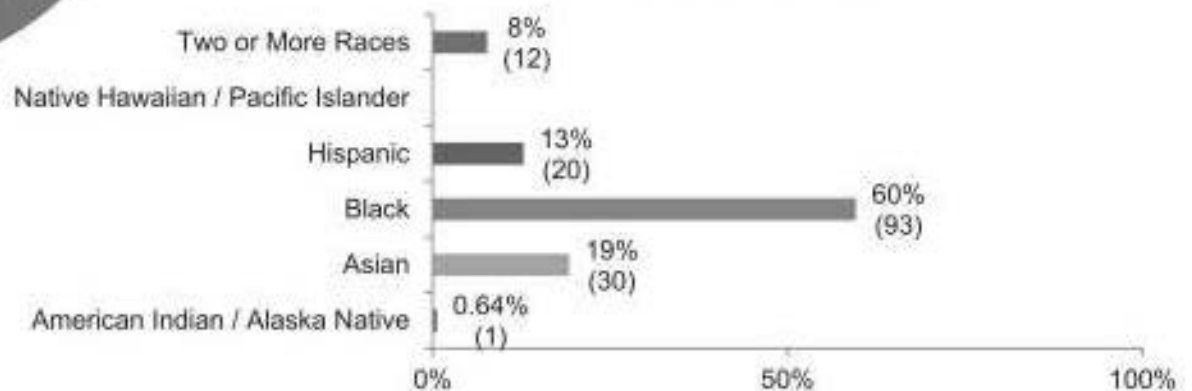
Workforce Composition
Operations: Age & Pay Band Distribution by Gender

FY2013 YTD Pay Band Distribution by Gender

Legend: Female, Male

Data labels (Female / Male):
- 30s: 3% (11) / 1% (4)
- 40s: 6% (24) / 4% (14)
- 50s: 27% (102) / 33% (125)
- 60s: 7% (28) / 10% (38)
- 70s: 3% (13) / 4% (14)
- 80-90s: 0.52% (2) / 2% (6)

FY2013 YTD Age Distribution by Gender

Legend: Female, Male

Data labels (Female / Male):
- Under 25: 2% (6) / 0.52% (2)
- 25-34: 14% (54) / 20% (76)
- 35-44: 16% (62) / 17% (65)
- 45-54: 10% (38) / 10% (39)
- 55-64: 5% (19) / 5% (18)
- 65 and Above: 0.26% (1) / 0.26% (1)

Recruitment & Hiring Analysis
Operations: Trends in Minority Hiring & Hiring by Ethnicity

FY2011-FY2013 YTD Minority Hiring

- 80%
- 70%
- 60%
- 50%
- 40%
- 30%
- 20%
- 10%
- 0%

FY2011: 47% (84), 53% (93)
FY2012: 29% (36), 71% (87)
FY2013 YTD: 34% (44), 66% (86)

Legend: ■ Minority ■ Non-Minority

FY2011-FY2013 YTD Hiring by Ethnicity

- 80%
- 70%
- 60%
- 50%
- 40%
- 30%
- 20%
- 10%
- 0%

American Indian / Alaska Native: 1% (2)
Asian: 6% (10), 11% (13), 8% (11)
Black: 33% (58), 15% (18), 15% (20)
Hispanic: 0.56% (1), 0.81% (1), 7% (9)
Native Hawaiian / Pacific Islander:
Two or More Races: 7% (13), 3% (4), 3% (4)
White: 53% (93), 71% (87), 66% (86)

Legend: ■ FY2011 ■ FY2012 ■ FY2013 YTD

32

Recruitment & Hiring Analysis
Operations: Trends in Hiring by Gender

FY2013 YTD Hiring by Gender

40%
(52)

60%
(78)

■ Female ■ Male

FY2011-FY2013 YTD Hiring Distribution by Gender

■ Female ■ Male

Attrition Analysis
Operations: Trends in Minority Attrition

FY2011-FY2013 YTD Attrition by Minority Status

FY2011-FY2013 YTD Types of Attrition for Minorities

Attrition Analysis
Operations: Trends in Attrition by Ethnicity

Attrition Rates from FY2011–FY2013 YTD

Legend: American Indian / Alaska Native, Asian, Black, Hispanic, Native Hawaiian / Pacific Islander, Two or More Races, White

Types of Attrition from FY2011

Legend: Involuntary, Retirement, Voluntary, Other

Attrition Analysis
Operations: Trends in Attrition by Ethnicity

Types of Attrition from FY2012

Types of Attrition from FY2013 YTD

Attrition Analysis
Operations: Trends in Attrition by Gender

Attrition from FY2011–FY2013 YTD

FY2011   FY2012   FY2013 YTD

■ Female ■ Male

Types of Attrition from FY2011

Involuntary   Retirement   Voluntary   Other

■ Female ■ Male

Attrition Analysis
Operations: Trends in Attrition by Gender

Types of Attrition from FY2012

Involuntary — 19% (3)
Retirement — 6% (1)
Voluntary — Female 75% (12), Male 100% (10)
Other

■ Female ■ Male

Types of Attrition from FY2013 YTD

Involuntary — Female 6% (1), Male
Retirement — Female 19% (3)
Voluntary — Female 75% (12), Male 57% (4)
Other

■ Female ■ Male

Workforce Composition
Consumer Education & Engagement: Distribution by Ethnicity & Minority Group
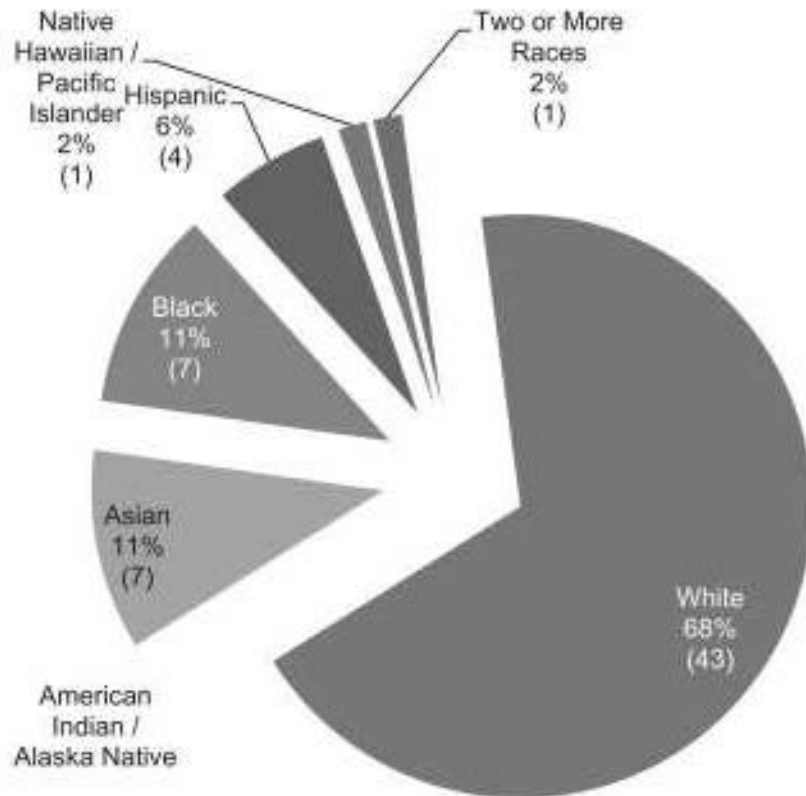
FY2013 YTD Ethnicity Distribution

Native Hawaiian / Pacific Islander 2% (1)
Hispanic 6% (4)
Two or More Races 2% (1)
Black 11% (7)
Asian 11% (7)
American Indian / Alaska Native
White 68% (43)

FY2011-FY2013 YTD Minority / Non-Minority Onboard Workforce

	FY2011	FY2012	FY2013 YTD
Non-Minority	88% (22)	73% (38)	68% (43)
Minority	12% (3)	27% (14)	32% (20)

◆ Minority   ■ Non- Minority

FY2013 YTD Minority Workforce Distribution by Ethnicity

Two or More Races	5% (1)
Native Hawaiian / Pacific Islander	5% (1)
Hispanic	20% (4)
Black	35% (7)
Asian	35% (7)
American Indian / Alaska Native	

0%   50%   100%
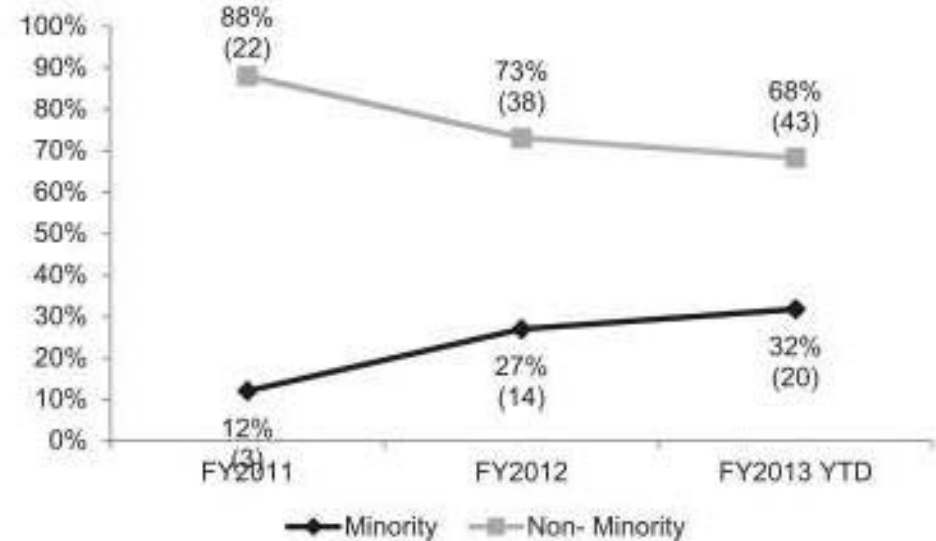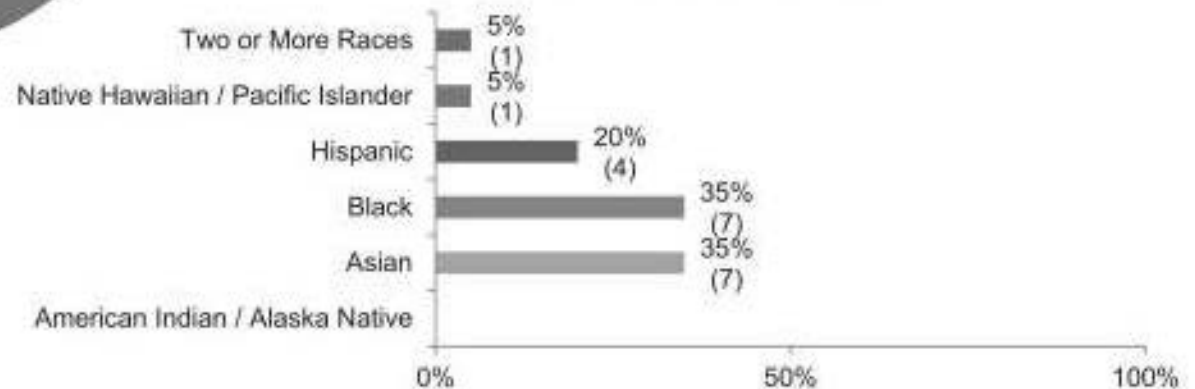
Workforce Composition

Consumer Education & Engagement: Age & Pay Band Distribution by Gender
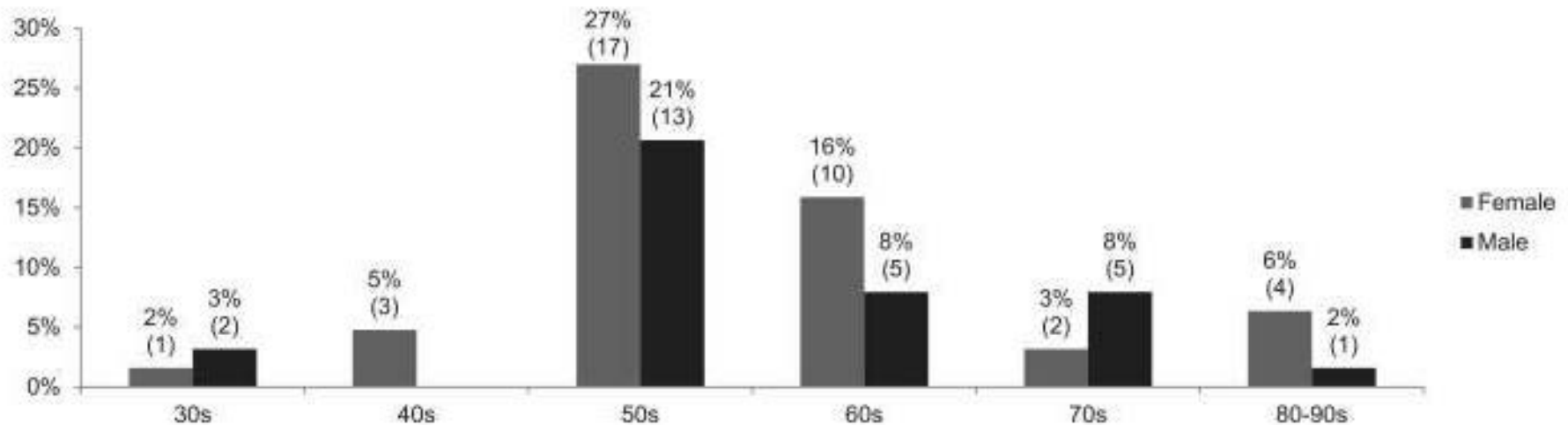
FY2013 YTD Pay Band Distribution by Gender

FY2013 YTD Age Distribution by Gender
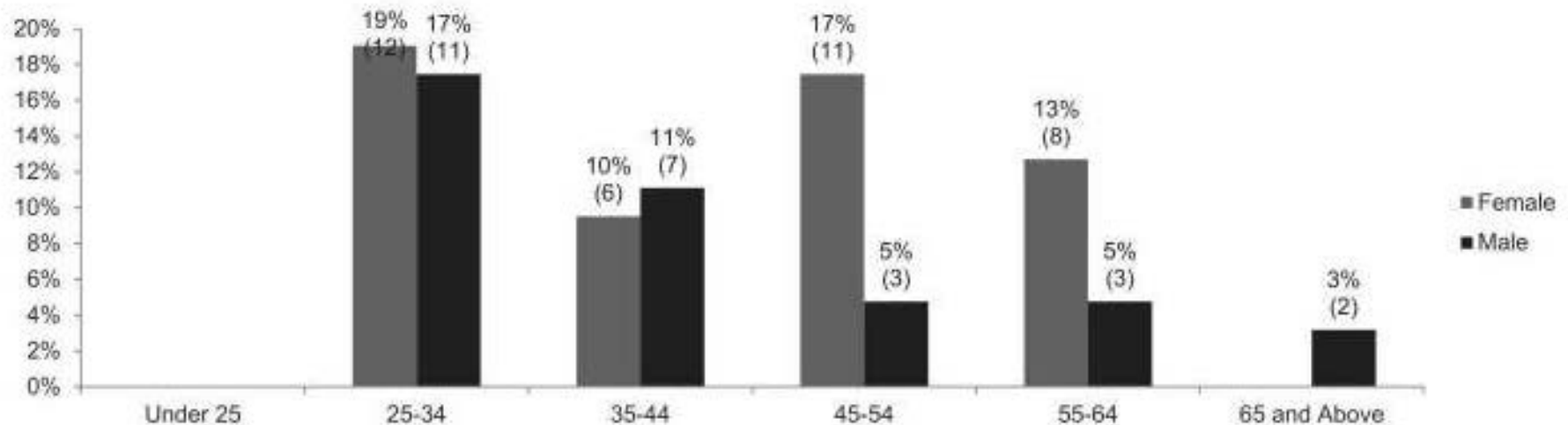
Recruitment & Hiring Analysis
Consumer Education & Engagement: Trends in Minority Hiring & Hiring by Ethnicity

FY2011-FY2013 YTD Minority Hiring

FY2011-FY2013 YTD Hiring by Ethnicity

Recruitment & Hiring Analysis

Consumer Education & Engagement: Trends in Hiring by Gender

FY2013 YTD Hiring by Gender

FY2011-FY2013 YTD Hiring Distribution by Gender

36%
(8)

64%
(14)

■ Female ■ Male

70%

64%
(14)

60%

52%
(13)

52%
(15)

48%
(12)

48%
(14)

50%

40%

36%
(8)

30%

20%

10%

0%

FY2011   FY2012   FY2013

■ Female ■ Male

42

Attrition Analysis

Consumer Education & Engagement: Trends in Minority Attrition

FY2011-FY2013 YTD Attrition by Minority Status

FY2011-FY2013 YTD Types of Attrition for Minorities

Attrition Analysis
Consumer Education & Engagement: Trends in Attrition by Ethnicity

Attrition Rates from FY2011-FY2013 YTD

American Indian / Alaska Native ■ Asian ■ Black ■ Hispanic ■ Native Hawaiian / Pacific Islander ■ Two or More Races ■ White

Types of Attrition from FY2011

■ Involuntary ■ Retirement ■ Voluntary ■ Other

Attrition Analysis
Consumer Education & Engagement: Trends in Attrition by Ethnicity

Types of Attrition from FY2012

Types of Attrition from FY2013 YTD

Attrition Analysis

Consumer Education & Engagement: Trends in Attrition by Gender

FY2011–FY2013 YTD Attrition Rates by Gender

■ Female ■ Male

Types of Attrition from FY2011

■ Female ■ Male

Attrition Analysis

Consumer Education & Engagement: Trends in Attrition by Gender

Types of Attrition from FY2012

		Female	Male

Types of Attrition from FY2013 YTD

Workforce Composition
Research, Markets, & Regulations: Distribution by Ethnicity & Minority Group

FY2013 YTD Ethnicity Distribution

Native Hawaiian / Pacific Islander

Two or More Races 2% (2)

Hispanic 4% (5)

Black 6% (7)

Asian 11% (13)

American Indian / Alaska Native

White 76% (87)

FY2011-FY2013 YTD Minority / Non-Minority Onboard Workforce

84% (64)	79% (88)	76% (87)
16% (12)	21% (23)	24% (27)

FY2011 — FY2012 — FY2013 YTD

◆ Minority ■ Non- Minority

FY2013 YTD Minority Workforce Distribution by Ethnicity

Two or More Races 7% (2)

Native Hawaiian / Pacific Islander

Hispanic 19% (5)

Black 26% (7)

Asian 48% (13)

American Indian / Alaska Native

0%   50%   100%

Workforce Composition
Research, Markets, & Regulations: Age & Pay Band Distribution by Gender

FY2013 YTD Pay Band Distribution by Gender

Legend: Female, Male

X-axis: 30s, 40s, 50s, 60s, 70s, 80-90s

Data labels:
- 30s: Female 4% (5), Male 0.88% (1)
- 40s: Female 3% (3), Male 3% (3)
- 50s: Female 11% (13), Male 8% (9)
- 60s: Female 13% (15), Male 19% (22)
- 70s: Female 13% (15), Male 18% (20)
- 80-90s: Female 3% (3), Male 4% (5)

FY2013 YTD Age Distribution by Gender

Legend: Female, Male

X-axis: Under 25, 25-34, 35-44, 45-54, 55-64, 65 and Above

Data labels:
- Under 25: Female 0.88% (1), Male 2% (2)
- 25-34: Female 22% (25), Male 11% (13)
- 35-44: Female 16% (18), Male 24% (27)
- 45-54: Female 3% (3), Male 9% (10)
- 55-64: Female 6% (7), Male 7% (8)

Recruitment & Hiring Analysis

Research, Markets, & Regulations: Trends in Minority Hiring & Hiring by Ethnicity

FY2011-FY2013 YTD Minority Hiring

FY2011-FY2013 YTD Hiring by Ethnicity

Recruitment & Hiring Analysis

Research, Markets, & Regulations: Trends in Hiring by Gender

FY2013 YTD Hiring by Gender

FY2011-FY2013 YTD Hiring Distribution by Gender

51

Attrition Analysis
Research, Markets, & Regulations: Trends in Minority Attrition

FY2011-FY2013 YTD Attrition by Minority Status

FY2011-FY2013 YTD Types of Attrition for Minorities

Attrition Analysis
Research, Markets, & Regulations: Trends in Attrition by Ethnicity

Attrition Rates from FY2011-FY2013 YTD

Legend: ■ American Indian / Alaska Native ■ Asian ■ Black ■ Hispanic ■ Native Hawaiian / Pacific Islander ■ Two or More Races ■ White

Types of Attrition from FY2011

Legend: ■ Involuntary ■ Retirement ■ Voluntary ■ Other

Attrition Analysis

Research, Markets, & Regulations: Trends in Attrition by Gender

Types of Attrition from FY2012

Types of Attrition from FY2013 YTD

Attrition Analysis

Research, Markets, & Regulations: Trends in Attrition by Gender

FY2011–FY2013 YTD Attrition Rates by Gender

- 30%
- 25%
- 20%
- 15%
- 10%
- 5%
- 0%

FY2011: 11% (4), 8% (1)

FY2012: 24% (11), 21% (13)

FY2013 YTD: 11% (6), 15% (9)

■ Female ■ Male

Types of Attrition from FY2011

- 120%
- 100%
- 80%
- 60%
- 40%
- 20%
- 0%

Involuntary   Retirement   Voluntary   Other

Voluntary: 100% (4), 100% (1)

■ Female ■ Male

Attrition Analysis

Research, Markets, & Regulations: Trends in Attrition by Gender

Types of Attrition from FY2012

- Female
- Male

Types of Attrition from FY2013 YTD

- Female
- Male

Workforce Composition

Supervision, Enforcement, & Fair Lending: Distribution by Ethnicity & Minority Group

FY2013 YTD Ethnicity Distribution

Hispanic
6%
(33)

Native Hawaiian / Pacific Islander
0.17%
(1)

Two or More Races
3%
(16)

Black
16%
(92)

Asian
9%
(56)

White
66%
(392)

American Indian / Alaska Native
0.34%
(2)

FY2011-FY2013 YTD Minority / Non-Minority Onboard Workforce

80%

66%
(230)

67%
(349)

66%
(392)

70%

60%

50%

40%

30%

34%
(116)

33%
(169)

34%
(200)

20%

10%

0%

FY2011   FY2012   FY2013 YTD

—◆—Minority   —■—Non- Minority

FY2013 YTD Minority Workforce Distribution by Ethnicity

Two or More Races — 8% (16)

Native Hawaiian / Pacific Islander — 0.5% (1)

Hispanic — 17% (33)

Black — 46% (92)

Asian — 28% (56)

American Indian / Alaska Native — 1% (2)

0%   50%   100%

Workforce Composition
Supervision, Enforcement, & Fair Lending: Age & Pay Band Distribution by Gender

FY2013 YTD Pay Band Distribution by Gender

Bar chart — Female / Male

- 30s: 5% (29) / 3% (19)
- 40s: 5% (27) / 11% (63)
- 50s: 16% (97) / 23% (135)
- 60s: 9% (55) / 10% (60)
- 70s: 7% (43) / 9% (52)
- 80-90s: 0.51% (3) / 2% (9)

FY2013 YTD Age Distribution by Gender

Bar chart — Female / Male

- Under 25: 0.34% (2) / 0.17% (1)
- 25-34: 16% (93) / 16% (96)
- 35-44: 11% (65) / 18% (104)
- 45-54: 10% (60) / 12% (71)
- 55-64: 6% (33) / 10% (59)
- 65 and Above: 0.17% (1) / 1% (7)
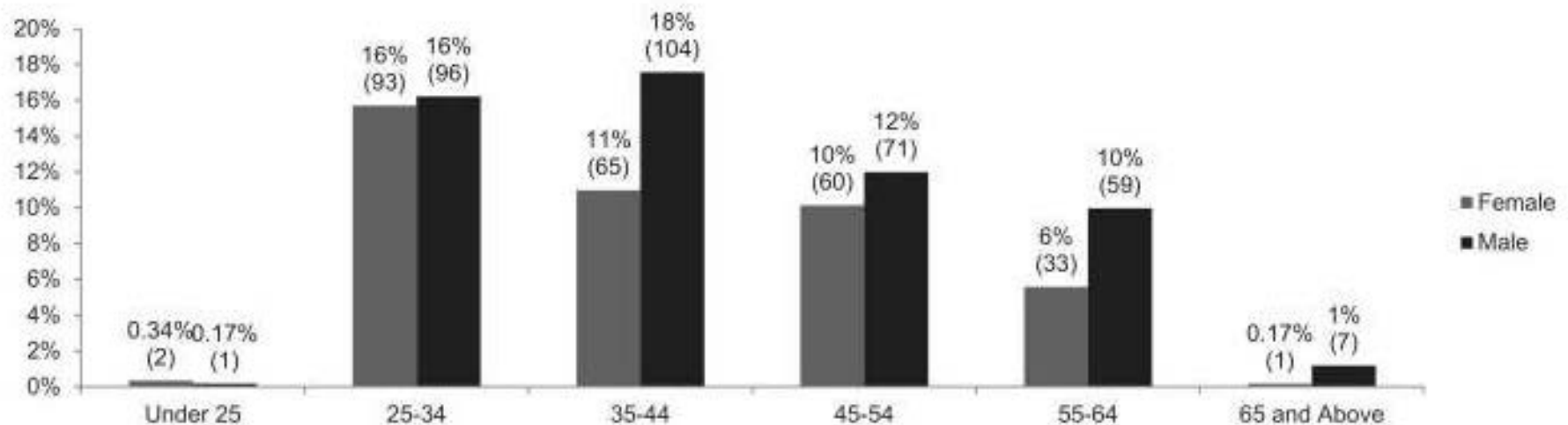
Recruitment & Hiring Analysis

Supervision, Enforcement, & Fair Lending: Trends in Minority Hiring & Hiring by Ethnicity

FY2011-FY2013 YTD Minority Hiring
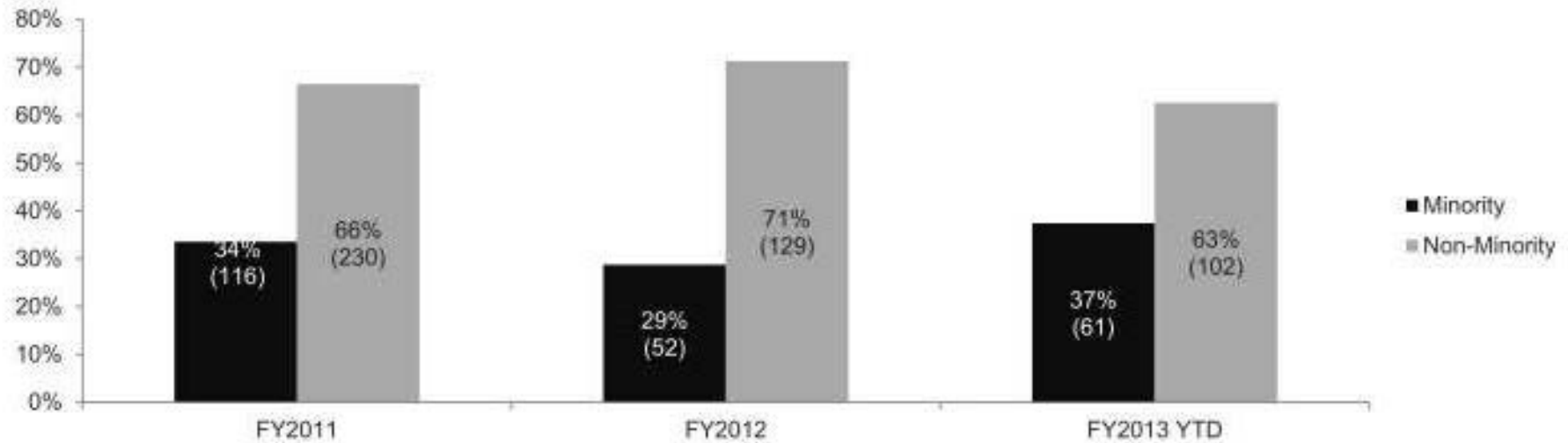
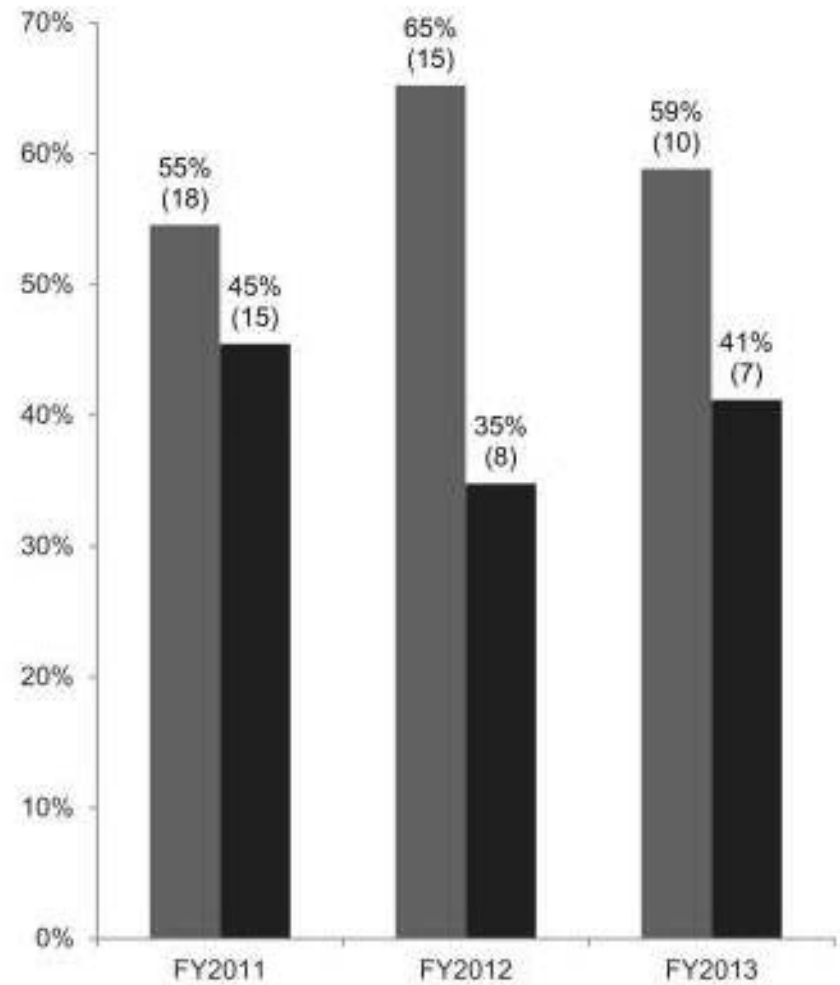## FY2011-FY2013 YTD Hiring by Ethnicity
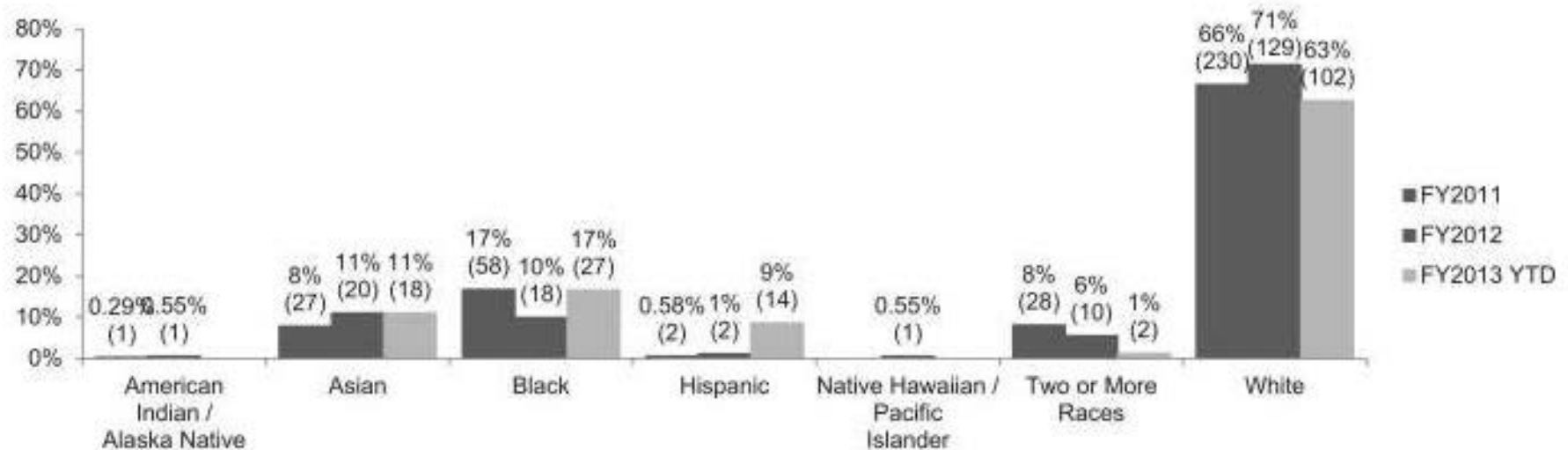
Recruitment & Hiring Analysis
Supervision, Enforcement, & Fair Lending: Trends in Hiring by Gender
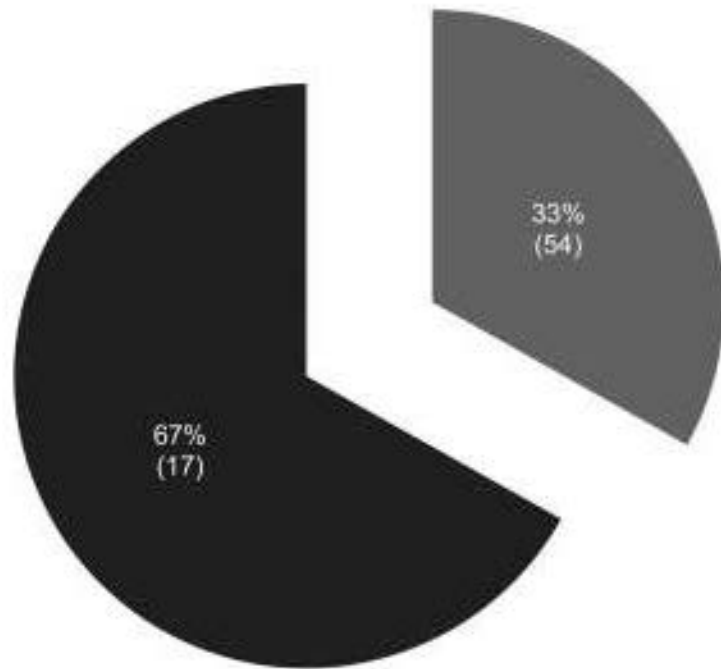
FY2013 YTD Hiring by Gender

FY2011-FY2013 YTD Hiring Distribution by Gender

Attrition Analysis
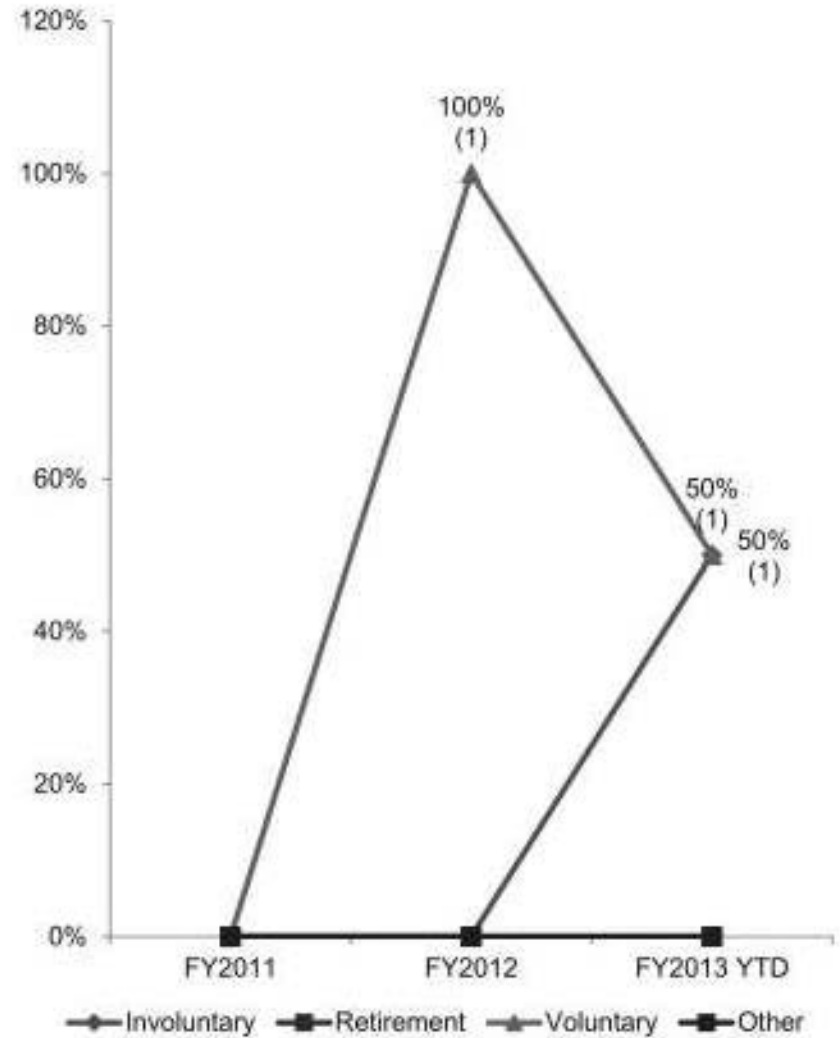*Supervision, Enforcement, & Fair Lending: Trends in Minority Attrition*

FY2011-FY2013 YTD Attrition by Minority Status

FY2011-FY2013 YTD Types of Attrition for Minorities
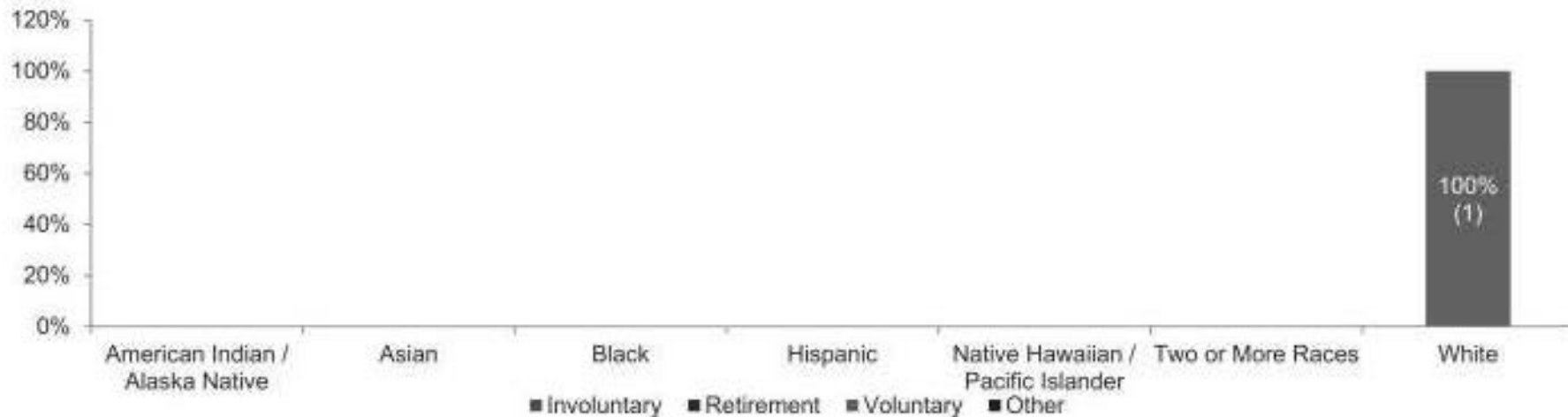
Attrition Analysis

Supervision, Enforcement, & Fair Lending: Trends in Attrition by Ethnicity

Attrition Rates from FY2011-FY2013 YTD

Legend: American Indian / Alaska Native · Asian · Black · Hispanic · Native Hawaiian / Pacific Islander · Two or More Races · White

Types of Attrition from FY2011

Legend: Involuntary · Retirement · Voluntary · Other
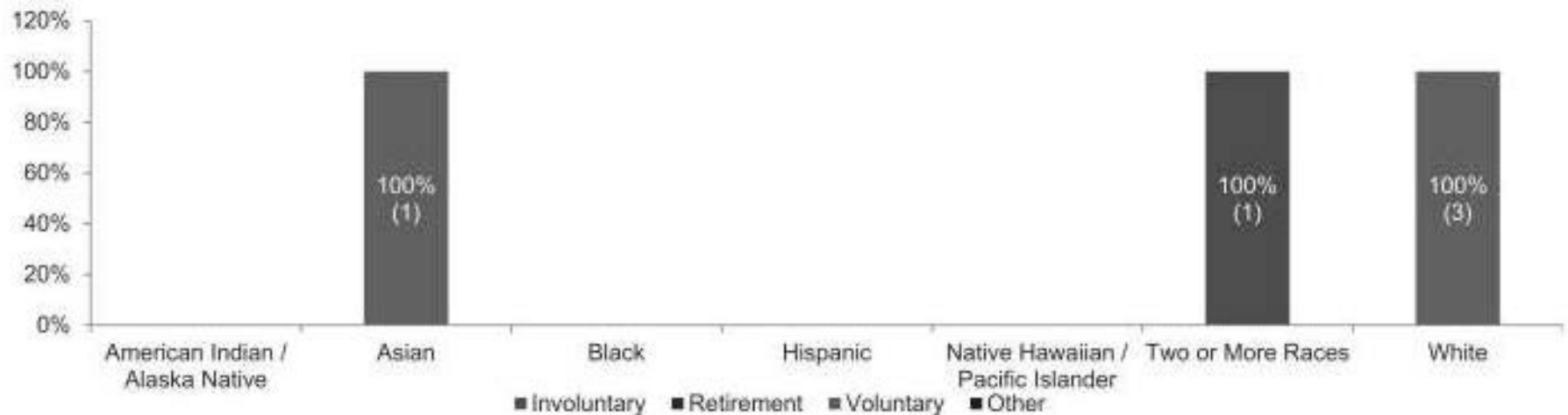
Attrition Analysis
Supervision, Enforcement, & Fair Lending: Trends in Attrition by Ethnicity

Types of Attrition from FY2012
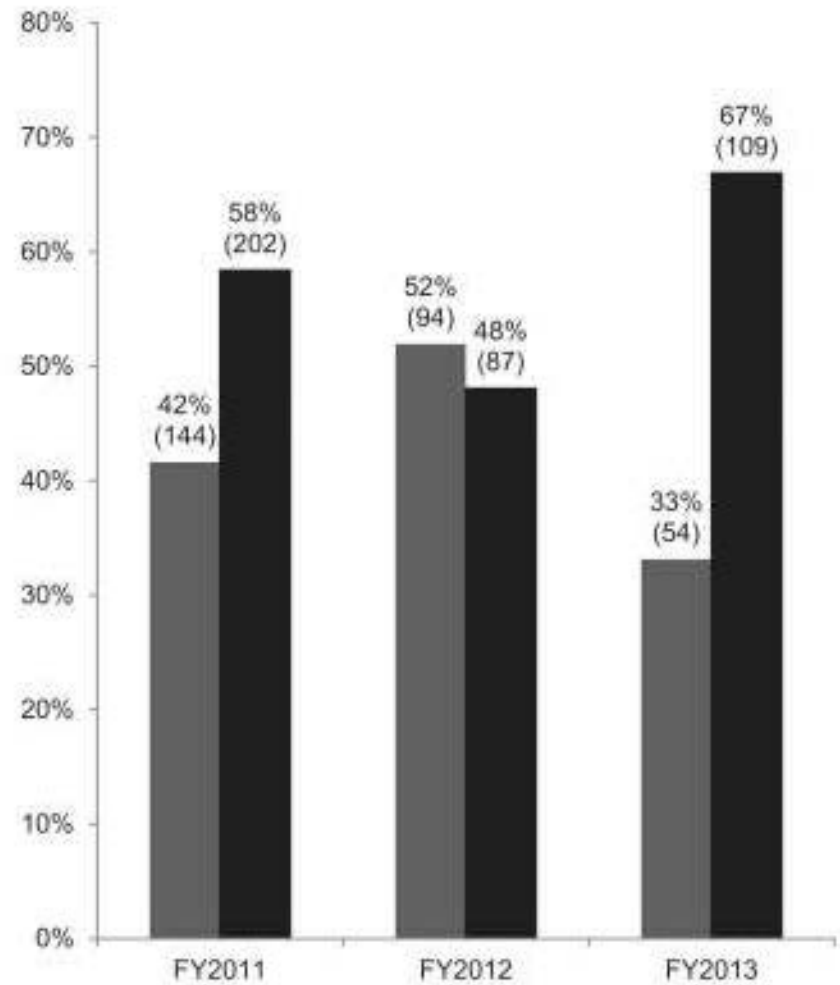
Types of Attrition from FY2013 YTD
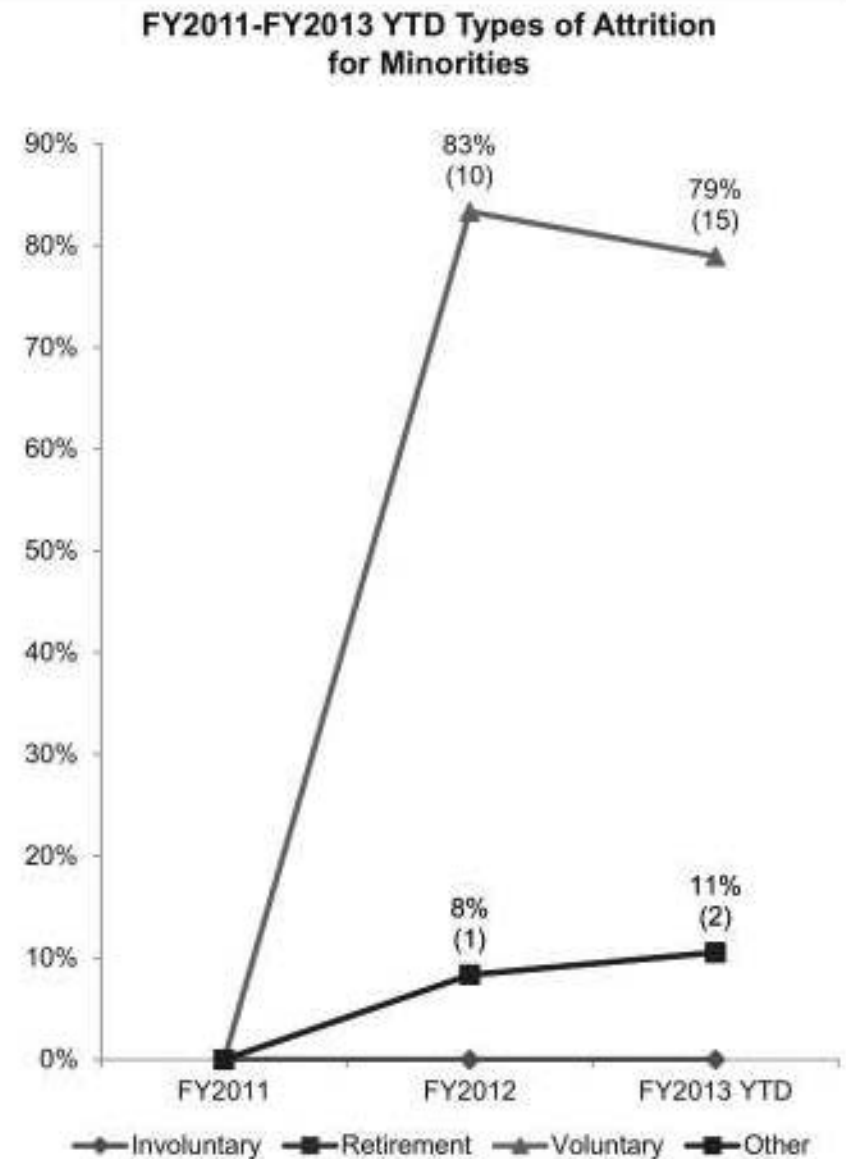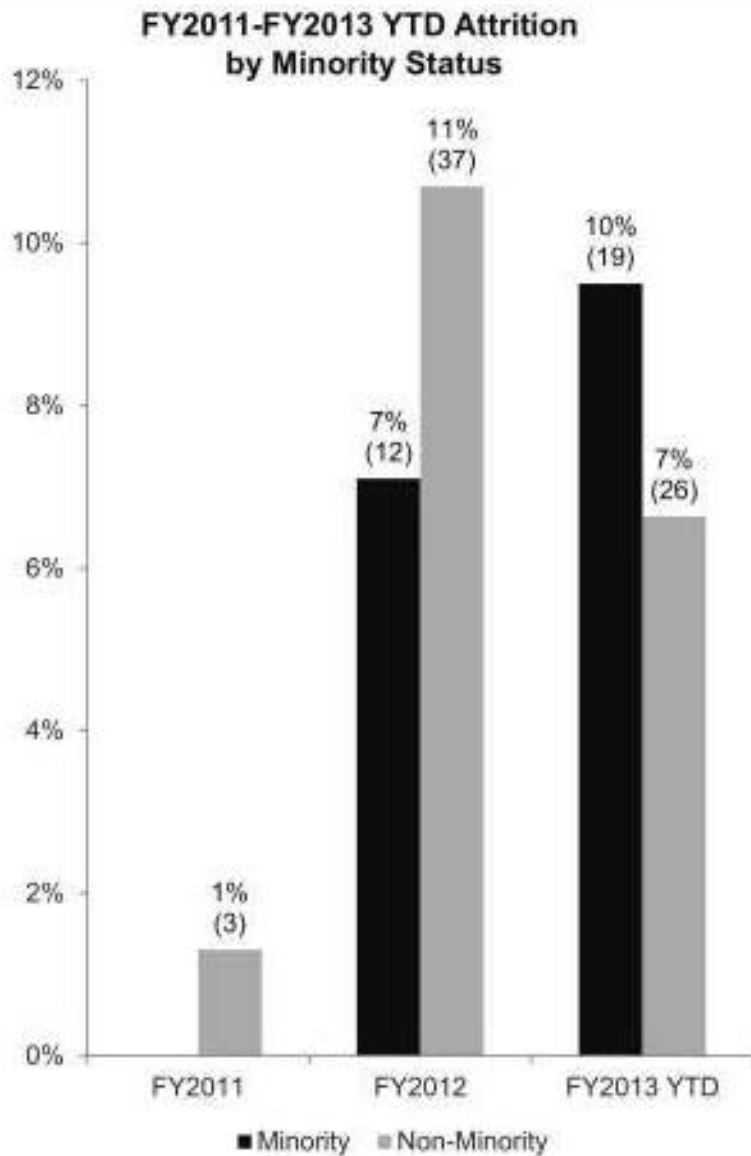
Attrition Analysis
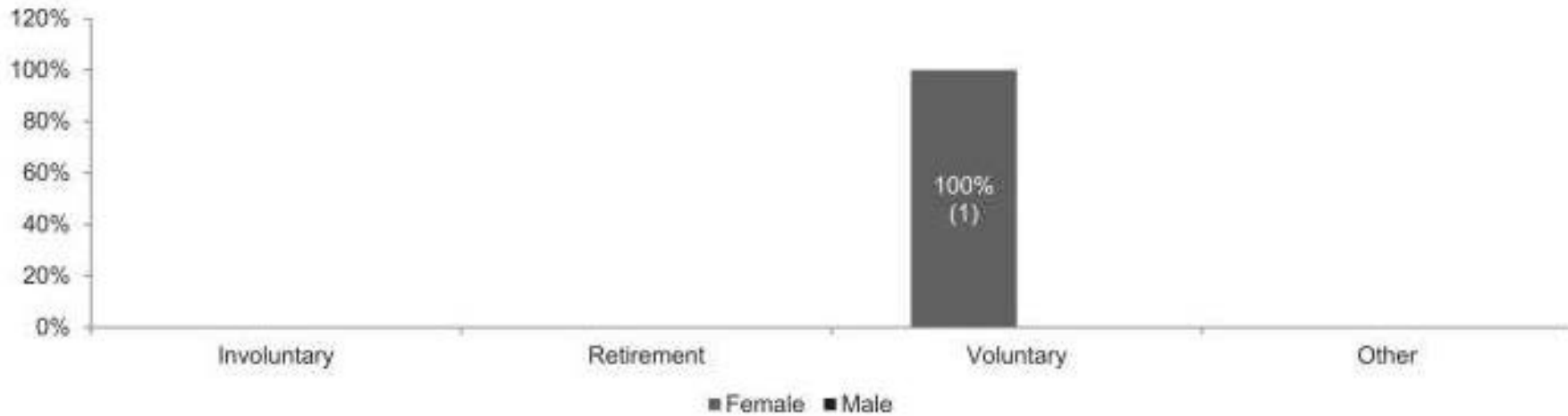*Supervision, Enforcement, & Fair Lending: Trends in Attrition by Gender*

FY2011–FY2013 YTD Attrition Rates by Gender
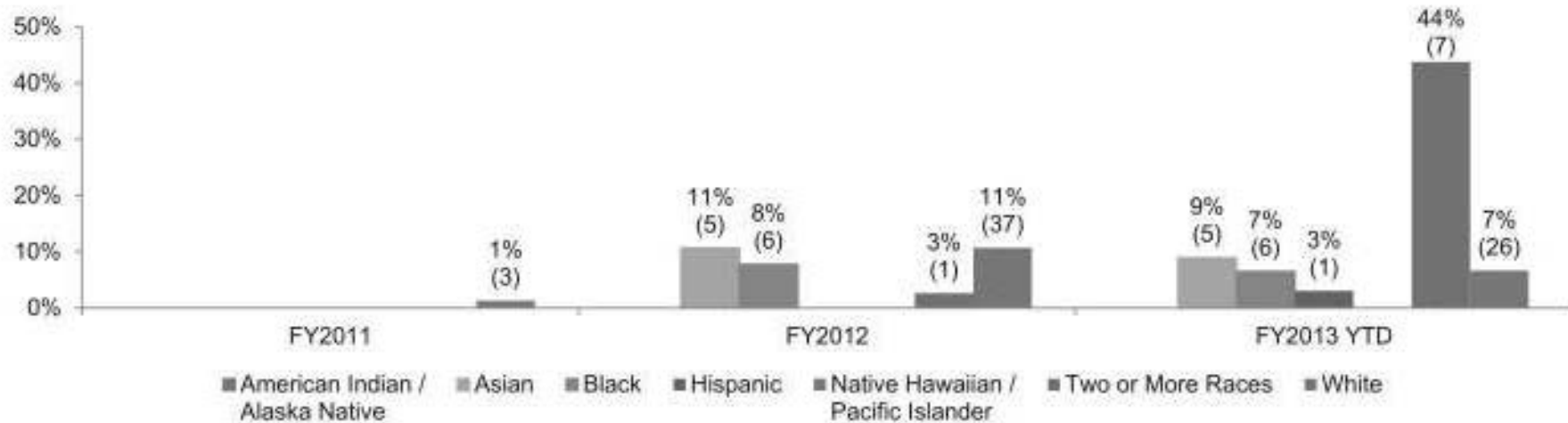
Types of Attrition from FY2011
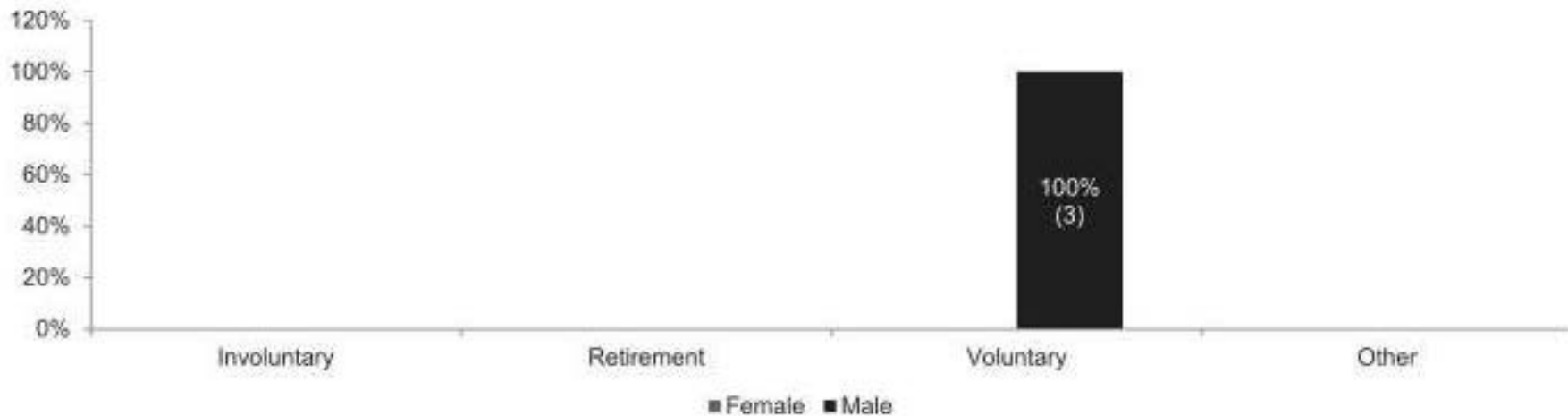
Attrition Analysis
Supervision, Enforcement, & Fair Lending: Trends in Attrition by Gender

Types of Attrition from FY2012

Female Male

Types of Attrition from FY2013 YTD

Female Male
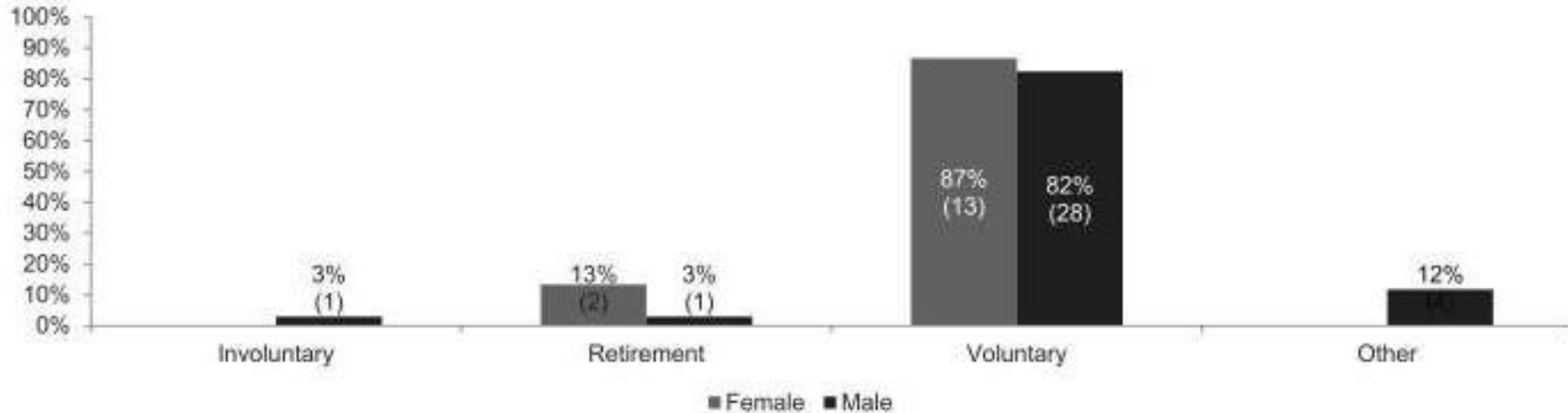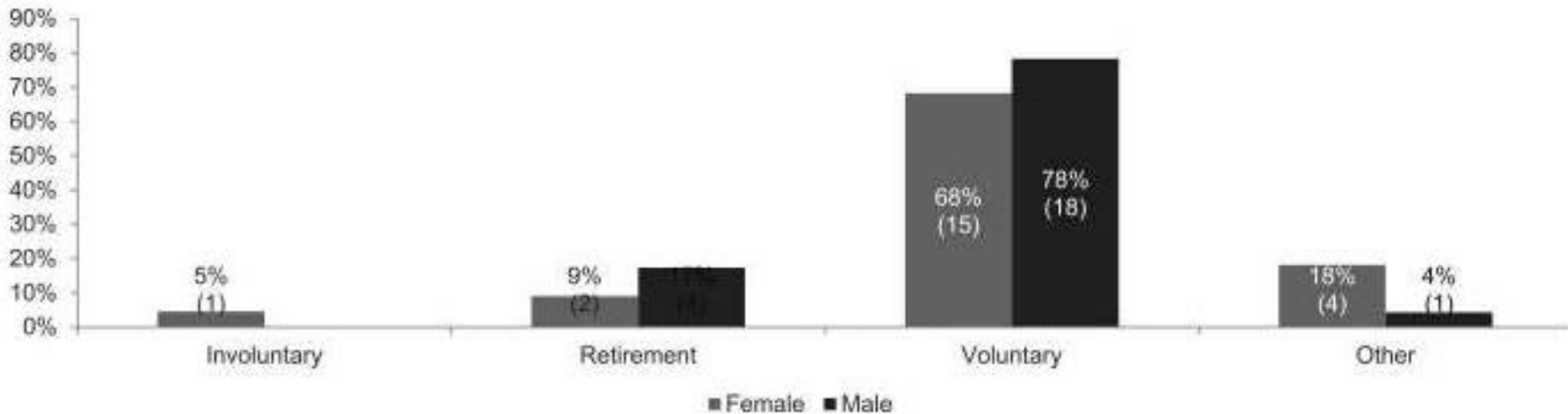
Workforce Composition

External Affairs: Distribution by Ethnicity & Minority Group
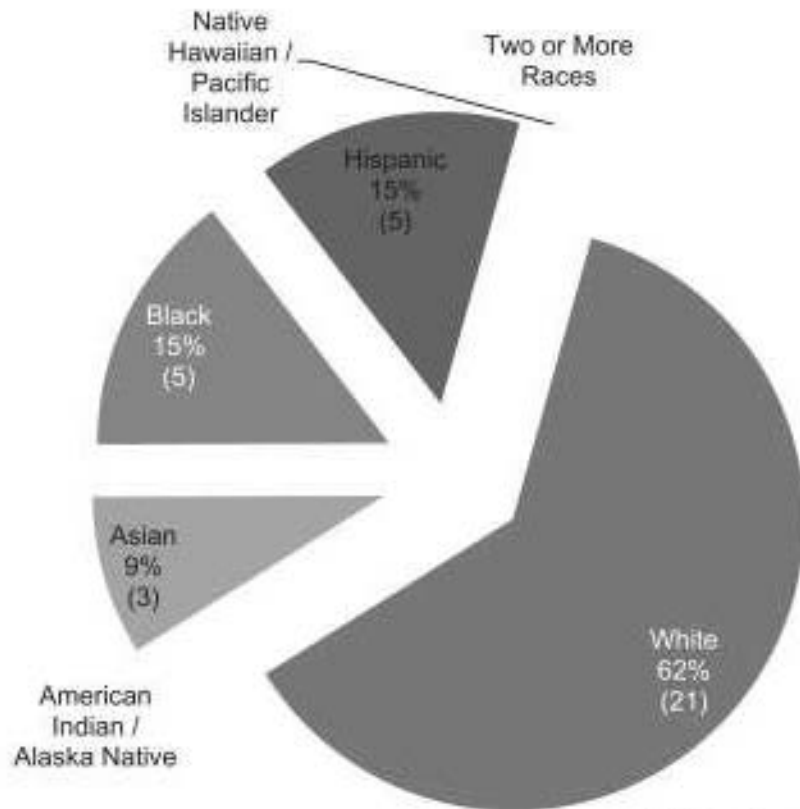
FY2013 YTD Ethnicity Distribution

Native Hawaiian / Pacific Islander
Two or More Races
Hispanic 15% (5)
Black 15% (5)
Asian 9% (3)
American Indian / Alaska Native
White 62% (21)

FY2011-FY2013 YTD Minority / Non-Minority Onboard Workforce

Non-Minority: 77% (10), 77% (24), 62% (21)
Minority: 23% (3), 23% (7), 38% (13)

FY2011 FY2012 FY2013 YTD

Minority   Non- Minority

FY2013 YTD Minority Workforce Distribution by Ethnicity

Two or More Races
Native Hawaiian / Pacific Islander
Hispanic 38% (5)
Black 38% (5)
Asian 23% (3)
American Indian / Alaska Native

0%   50%   100%
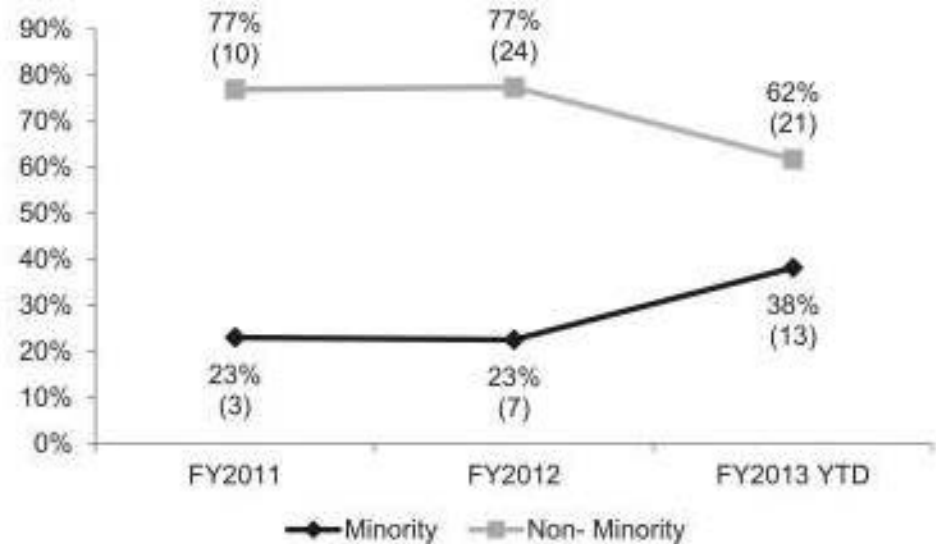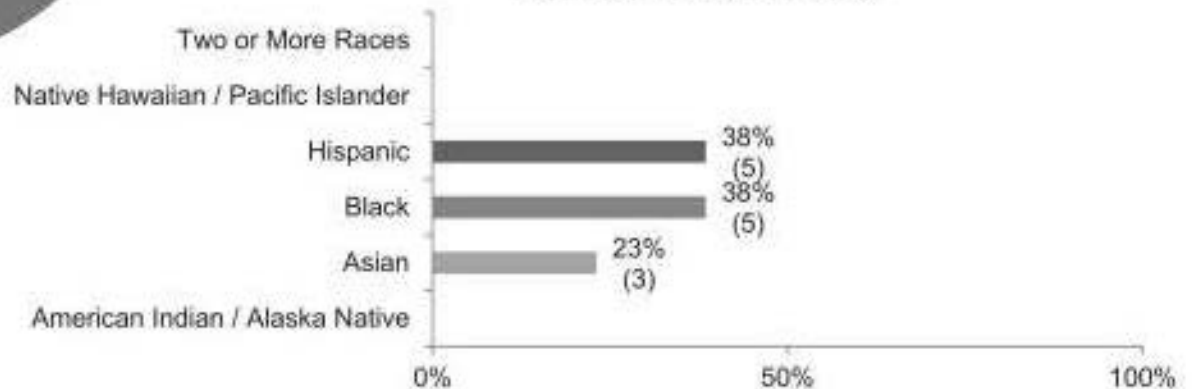
Workforce Composition

External Affairs: Age & Pay Band Distribution by Gender
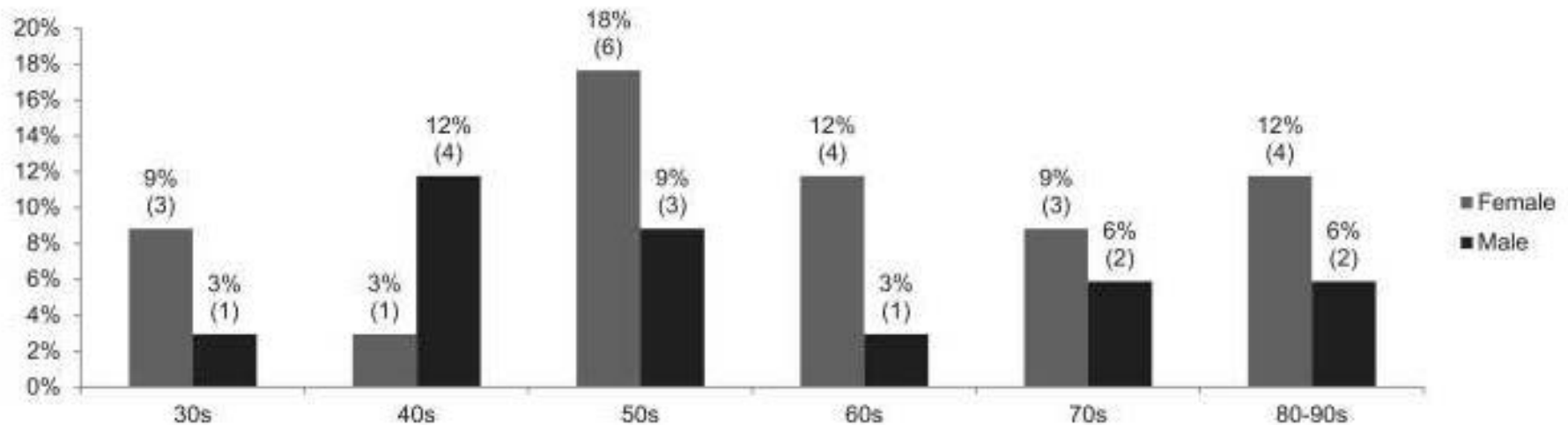
FY2013 YTD Pay Band Distribution by Gender

FY2013 YTD Age Distribution by Gender

Recruitment & Hiring Analysis

External Affairs: Trends in Minority Hiring & Hiring by Ethnicity

FY2011-FY2013 YTD Minority Hiring

Minority
Non-Minority

FY2011: 23% (3), 77% (10)
FY2012: 22% (4), 78% (14)
FY2013 YTD: 55% (6), 45% (5)

FY2011-FY2013 YTD Hiring by Ethnicity

FY2011
FY2012
FY2013 YTD

American Indian / Alaska Native
Asian: 8% (1), 11% (2), 9% (1)
Black: 15% (2), 6% (1), 18% (2)
Hispanic: 6% (1), 27% (3)
Native Hawaiian / Pacific Islander
Two or More Races
White: 77% (10), 78% (14), 45% (5)
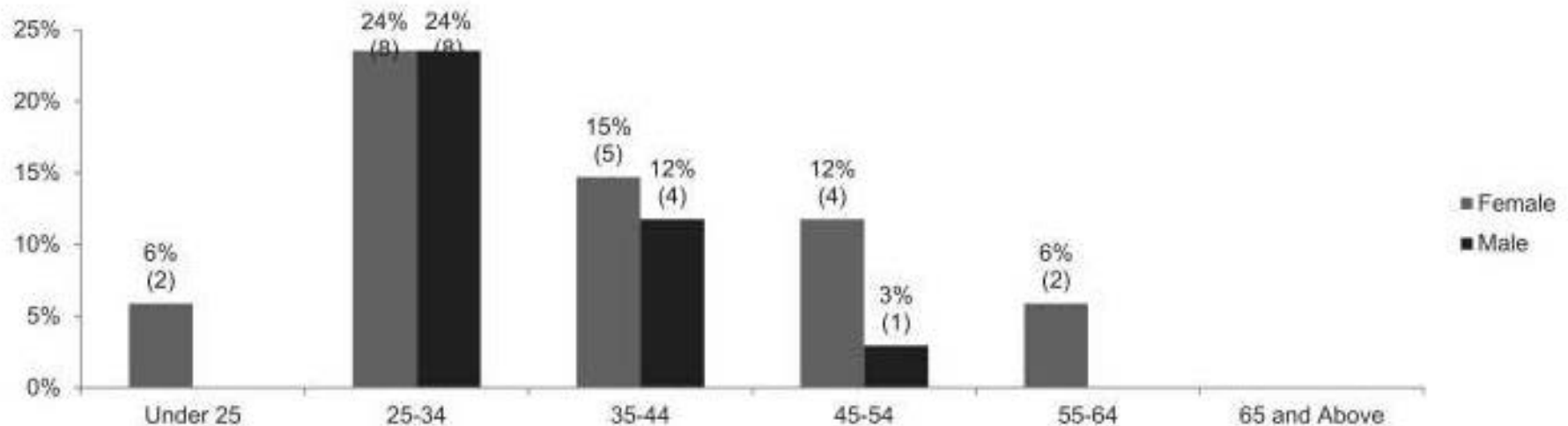
Recruitment & Hiring Analysis

External Affairs: Trends in Hiring by Gender

FY2013 YTD Hiring by Gender

36%
(4)

64%
(7)

■ Female ■ Male

FY2011-FY2013 YTD Hiring Distribution by Gender

80%

72%
(13)

70%

64%
(7)

62%
(8)

60%

50%

38%
(5)

40%

36%
(4)

30%

28%
(5)

20%

10%

0%

FY2011   FY2012   FY2013

■ Female ■ Male

Attrition Analysis
External Affairs: Trends in Minority Attrition

FY2011-FY2013 YTD Attrition by Minority Status

FY2011-FY2013 YTD Types of Attrition for Minorities

Attrition Analysis
External Affairs: Trends in Attrition by Ethnicity

Attrition Rates from FY2011-FY2013 YTD

Legend: American Indian / Alaska Native, Asian, Black, Hispanic, Native Hawaiian / Pacific Islander, Two or More Races, White

Types of Attrition from FY2011

Legend: Involuntary, Retirement, Voluntary, Other

Attrition Analysis
External Affairs: Trends in Attrition by Ethnicity

Types of Attrition from FY2012

120%	
100%	
80%	
60%	83% (5)
40%	
20%	
0%	17% (1)

American Indian / Alaska Native — Asian — Black — Hispanic — Native Hawaiian / Pacific Islander — Two or More Races — White

■ Involuntary ■ Retirement ■ Voluntary ■ Other

Types of Attrition from FY2013 YTD

120%	
100%	
80%	50% (1)
60%	100% (1)
40%	
20%	50% (1)
0%	

American Indian / Alaska Native — Asian — Black — Hispanic — Native Hawaiian / Pacific Islander — Two or More Races — White

■ Involuntary ■ Retirement ■ Voluntary ■ Other

Attrition Analysis
External Affairs: Trends in Attrition by Gender

FY2011–FY2013 YTD Attrition Rates by Gender

- 35%
- 30%
- 25%
- 20%
- 15%
- 10%
- 5%
- 0%

FY2011 — 20% (1)

FY2012 — 33%, 14% (3)

FY2013 YTD — 15% (2), (1)

■ Female ■ Male

Types of Attrition from FY2011

- 120%
- 100%
- 80%
- 60%
- 40%
- 20%
- 0%

Involuntary   Retirement   Voluntary 100% (1)   Other

■ Female ■ Male

Attrition Analysis
External Affairs: Trends in Attrition by Gender

Types of Attrition from FY2012

Types of Attrition from FY2013 YTD

Workforce Composition
Legal: Distribution by Ethnicity & Minority Group

FY2013 YTD Ethnicity Distribution

Native Hawaiian / Pacific Islander (1)

Two or More Races 2% (1)

Hispanic 2% (1)

Asian 10% (6)

American Indian / Alaska Native

White 81% (47)

FY2011-FY2013 YTD Minority / Non-Minority Onboard Workforce

Non-Minority: FY2011 76% (25), FY2012 83% (45), FY2013 YTD 81% (47)

Minority: FY2011 24% (8), FY2012 17% (9), FY2013 YTD 19% (11)

—♦— Minority   —■— Non- Minority

FY2013 YTD Minority Workforce Distribution by Ethnicity

Two or More Races: 9% (1)

Native Hawaiian / Pacific Islander

Hispanic: 9% (1)

Black: 27% (3)

Asian: 55% (6)

American Indian / Alaska Native

Workforce Composition

Legal: Age & Pay Band Distribution by Gender

FY2013 YTD Pay Band Distribution by Gender

FY2013 YTD Age Distribution by Gender

Recruitment & Hiring Analysis
Legal: Trends in Minority Hiring & Hiring by Ethnicity

FY2011-FY2013 YTD Minority Hiring

FY2011-FY2013 YTD Hiring by Ethnicity

Recruitment & Hiring Analysis
Legal: Trends in Hiring by Gender

FY2013 YTD Hiring by Gender

FY2011-FY2013 YTD Hiring Distribution by Gender

41%
(7)

59%
(10)

■ Female ■ Male

70%

65%
(15)

60%

59%
(10)

55%
(18)

50%

45%
(15)

41%
(7)

40%

35%
(8)

30%

20%

10%

0%

FY2011   FY2012   FY2013

■ Female ■ Male

Attrition Analysis
Legal: Trends in Minority Attrition

FY2011-FY2013 YTD Attrition by Minority Status

FY2011-FY2013 YTD Types of Attrition for Minorities

Attrition Analysis
Legal: Trends in Attrition by Ethnicity

Attrition Rates from FY2011-FY2013 YTD

Legend: American Indian / Alaska Native ∙ Asian ∙ Black ∙ Hispanic ∙ Native Hawaiian / Pacific Islander ∙ Two or More Races ∙ White

Types of Attrition from FY2011

Legend: Involuntary ∙ Retirement ∙ Voluntary ∙ Other

Attrition Analysis
Legal: Trends in Attrition by Ethnicity

Types of Attrition from FY2012

Categories (x-axis): American Indian / Alaska Native, Asian, Black, Hispanic, Native Hawaiian / Pacific Islander, Two or More Races, White

Black: 100% (1)
White: 80% (4), 20% (1)

Legend: Involuntary, Retirement, Voluntary, Other

Types of Attrition from FY2013 YTD

Categories (x-axis): American Indian / Alaska Native, Asian, Black, Hispanic, Native Hawaiian / Pacific Islander, Two or More Races, White

Asian: 100% (1)
Two or More Races: 100% (1)
White: 100% (3)

Legend: Involuntary, Retirement, Voluntary, Other

Attrition Analysis
Legal: Trends in Attrition by Gender

FY2011–FY2013 YTD Attrition Rates by Gender

- Female
- Male

Types of Attrition from FY2011

- Female
- Male

Attrition Analysis
Legal: Trends in Attrition by Gender

Types of Attrition from FY2012

Female ■ Male

Types of Attrition from FY2013 YTD

Female ■ Male

Promotion Analysis
Data Considerations

Data Considerations

(b)(5)

Promotion Analysis
Promotions by Minority/Non-Minority and Pay Band

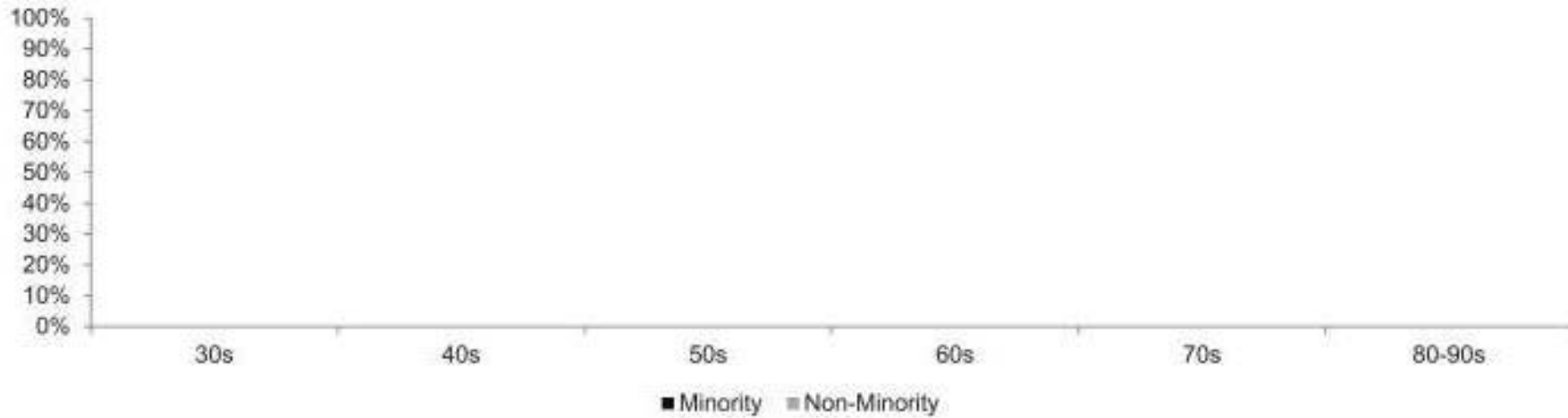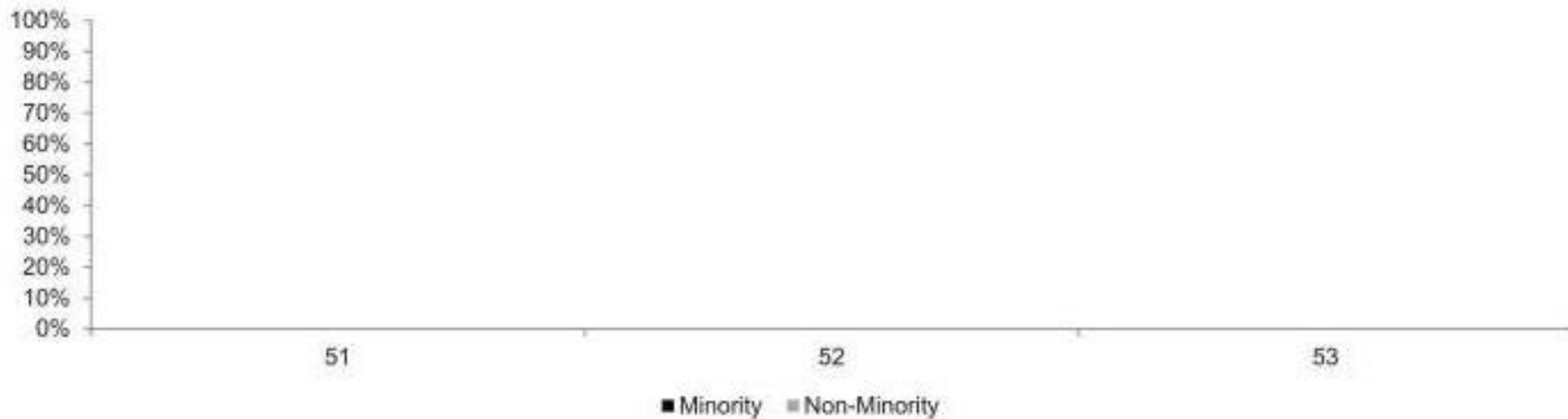### FY2011 Promotions by Minority/Non-Minority and Pay Band

Minority ■ Non-Minority ■

FY2011 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Minority ■ Non-Minority ■

Promotion Analysis
Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and Pay Band

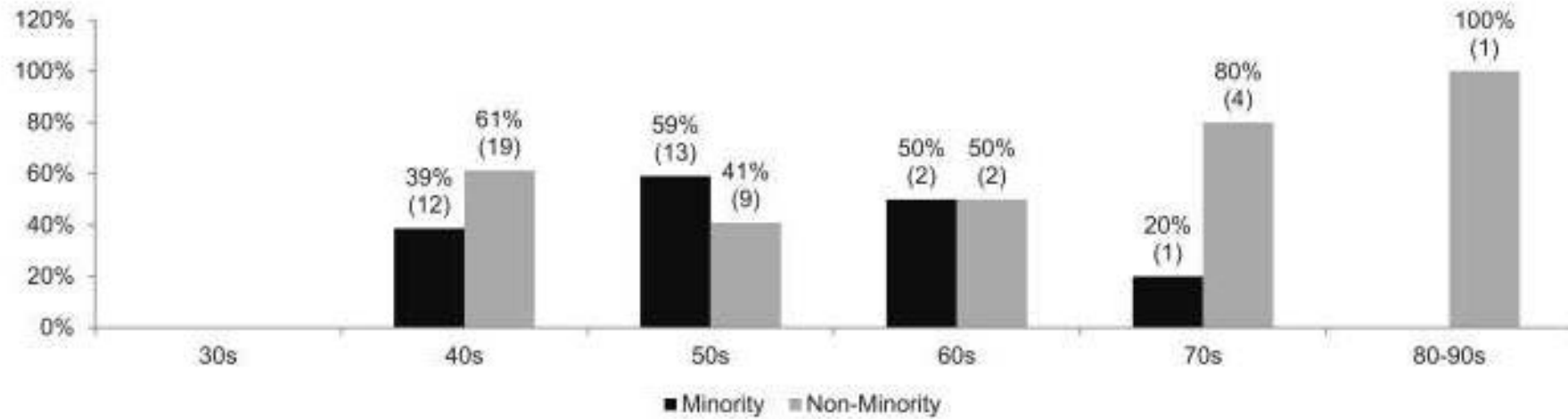Legend: ■ Minority ■ Non-Minority

FY2012 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Legend: ■ Minority ■ Non-Minority

Promotion Analysis
Promotions by Minority/Non-Minority and Pay Band

FY2013 YTD Promotions by Minority/Non-Minority and Pay Band

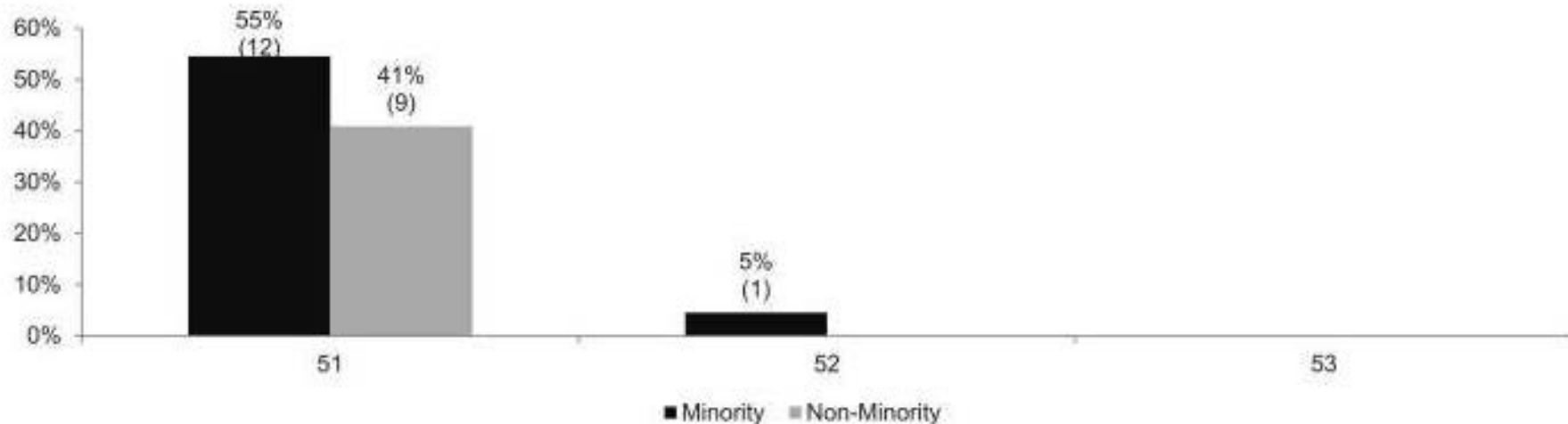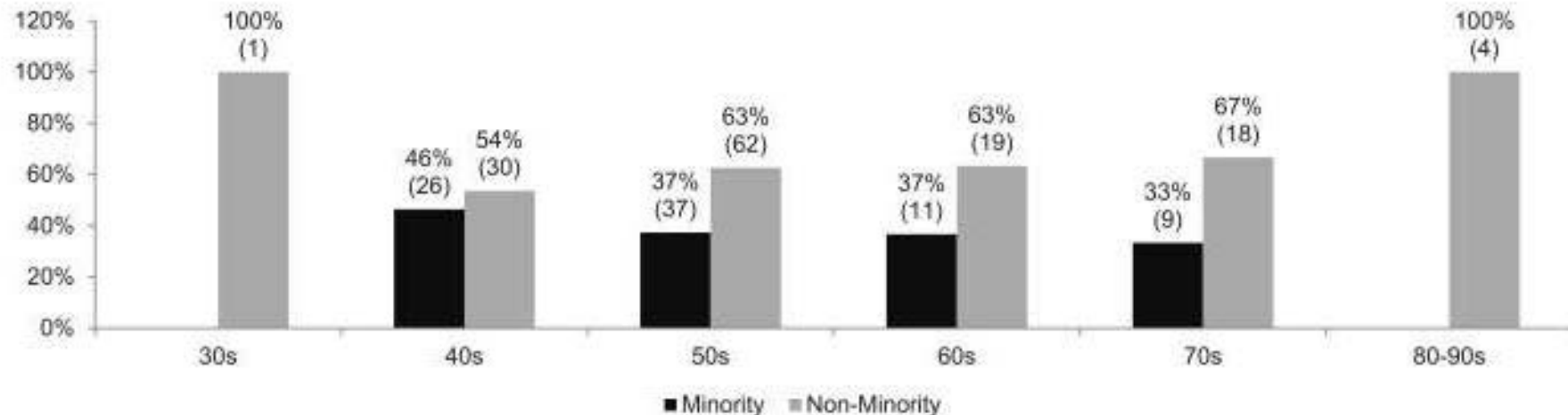## FY2013 YTD Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis

Operations: Promotions by Minority/Non-Minority and Pay Band

FY2011 Promotions by Minority/Non-Minority and Pay Band

Legend: Minority, Non-Minority

X-axis: 30s, 40s, 50s, 60s, 70s, 80-90s
Y-axis: 0% to 100%

FY2011 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Legend: Minority, Non-Minority

X-axis: 51, 52, 53
Y-axis: 0% to 100%

Promotion Analysis
Operations: Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and Pay Band

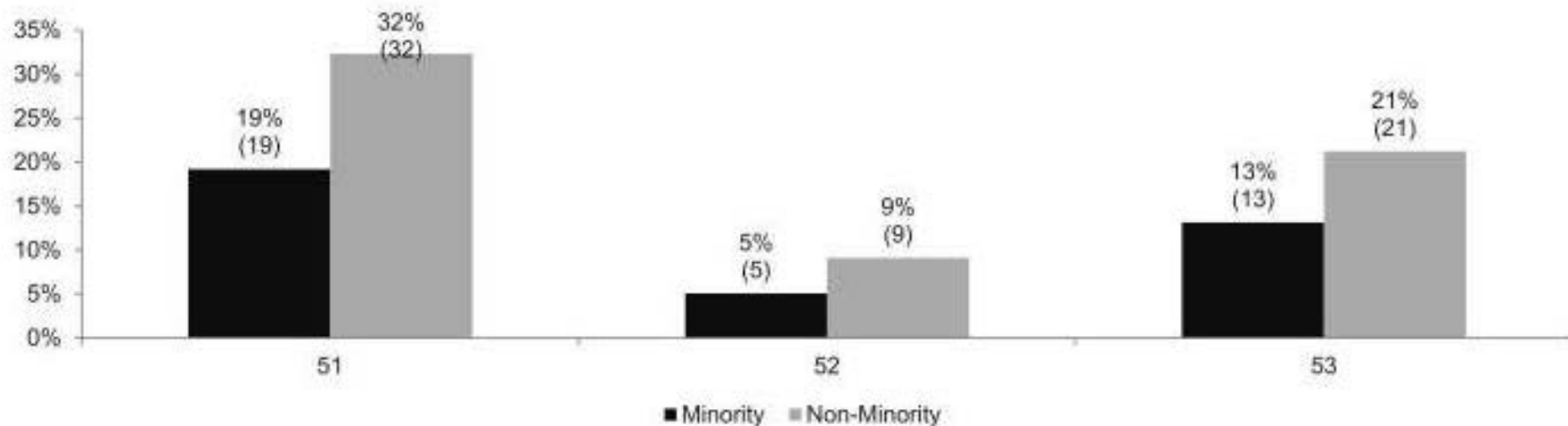## FY2012 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis

Operations: Promotions by Minority/Non-Minority and Pay Band

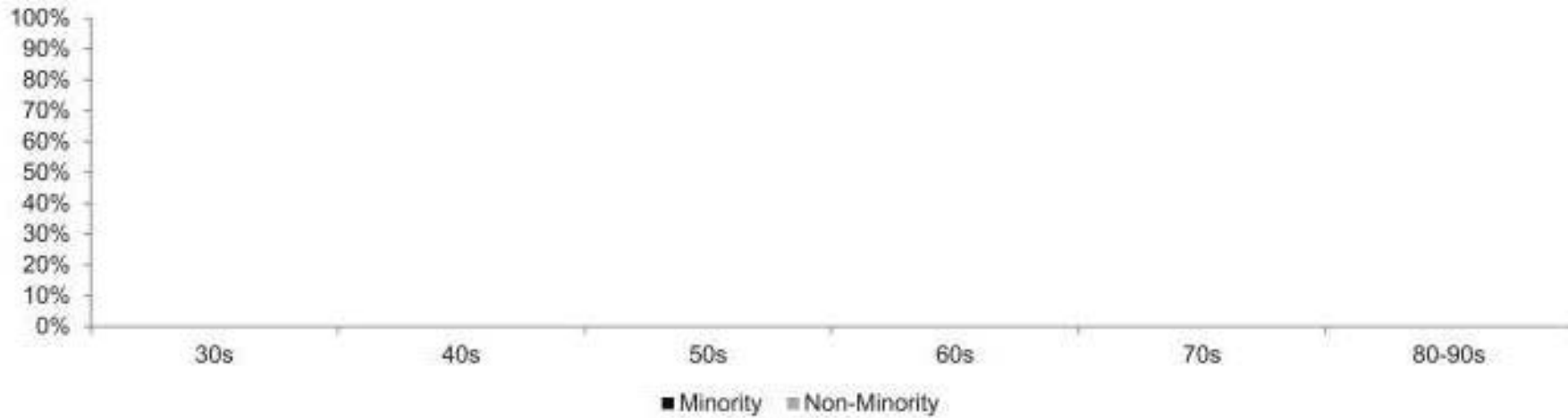## FY2013 YTD Promotions by Minority/Non-Minority and Pay Band

FY2013 YTD Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis

Consumer Education: Promotions by Minority/Non-Minority and Pay Band

FY2011 Promotions by Minority/Non-Minority and Pay Band

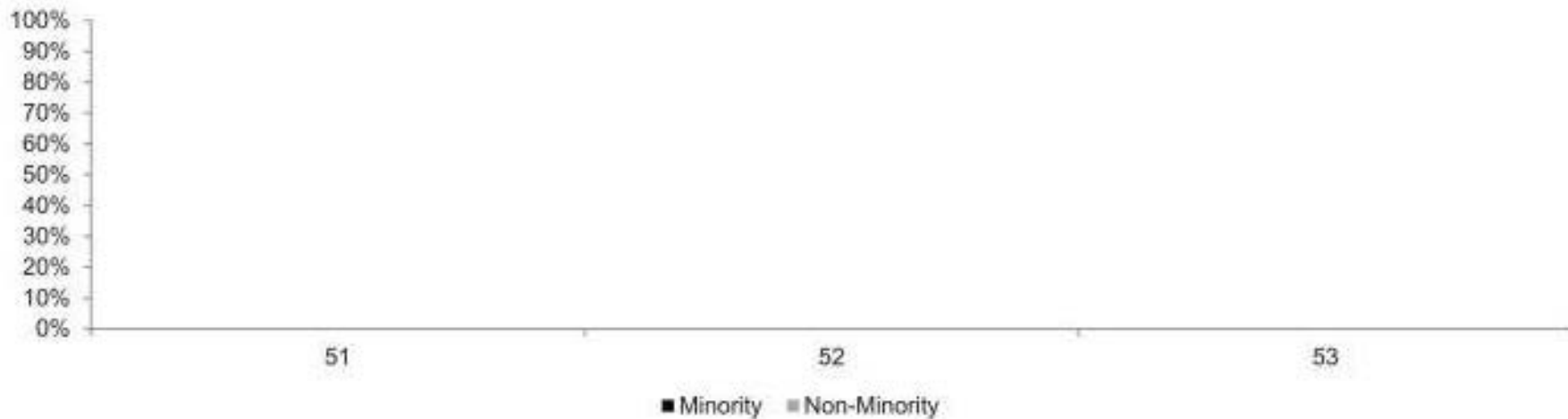## FY2011 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis
Consumer Education: Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

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Promotion Analysis
Consumer Education: Promotions by Minority/Non-Minority and Pay Band

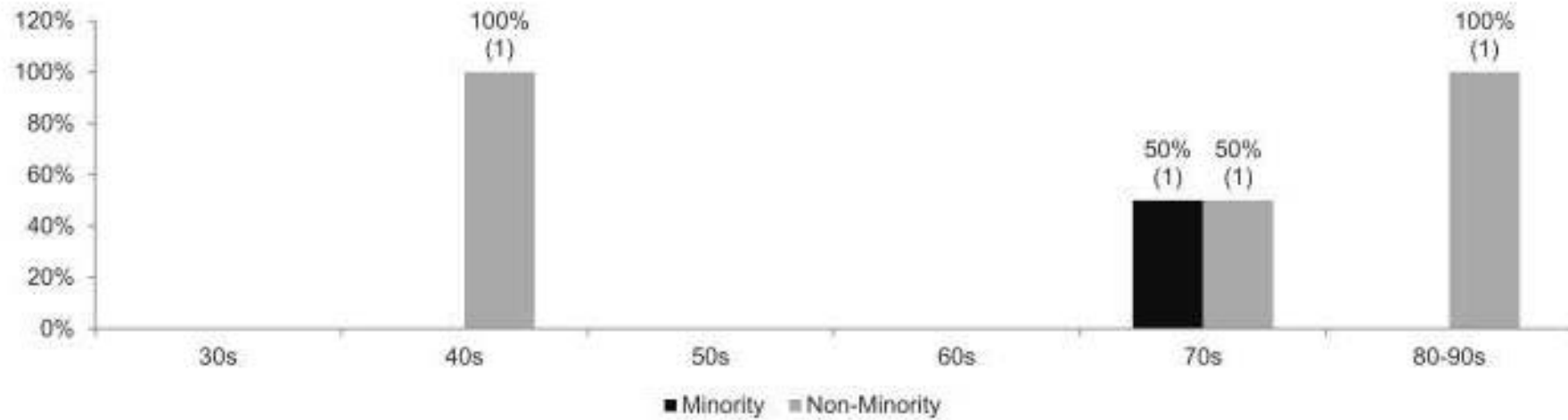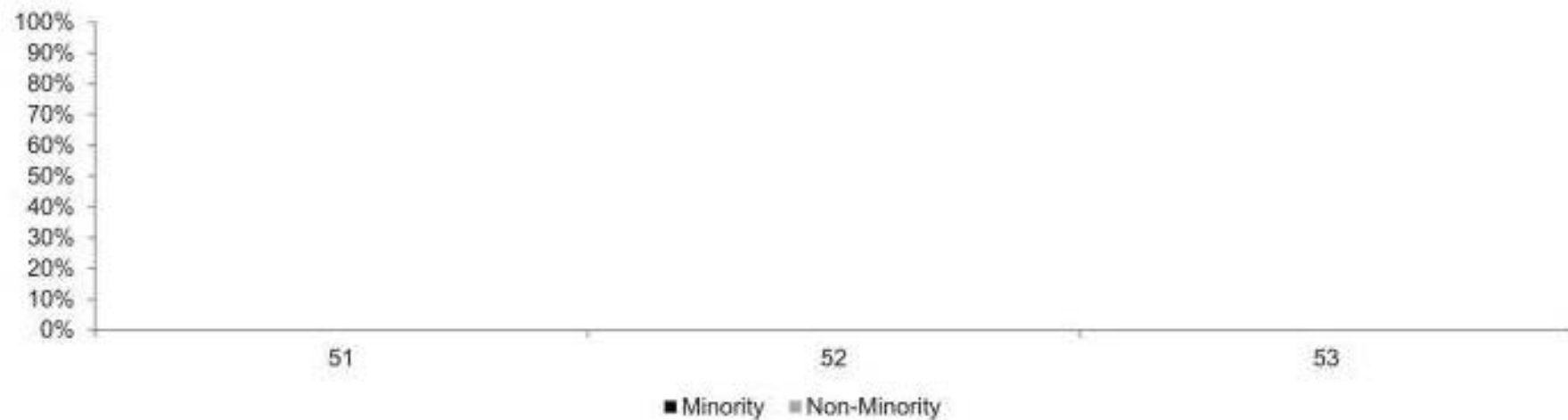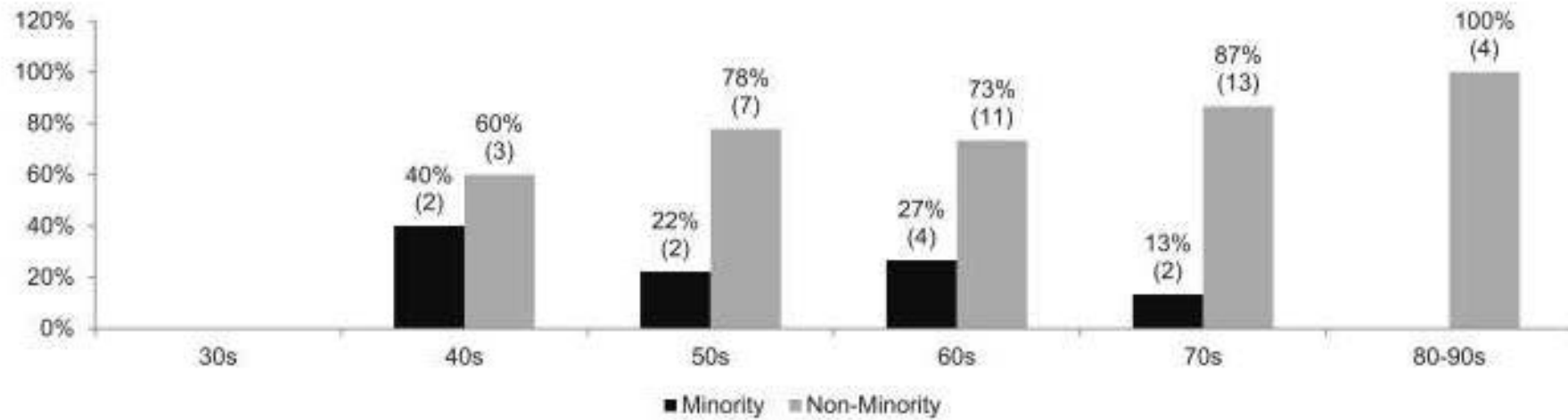### FY2013 YTD Promotions by Minority/Non-Minority and Pay Band

FY2013 YTD Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis

Supervision: Promotions by Minority/Non-Minority and Pay Band

FY2011 Promotions by Minority/Non-Minority and Pay Band

```
100%
 90%
 80%
 70%
 60%
 50%
 40%
 30%
 20%
 10%
  0%
        30s         40s         50s         60s         70s       80-90s

               ■ Minority    ■ Non-Minority
```

FY2011 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

```
100%
 90%
 80%
 70%
 60%
 50%
 40%
 30%
 20%
 10%
  0%
           51                    52                    53

               ■ Minority    ■ Non-Minority
```

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Promotion Analysis

Supervision: Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and Pay Band

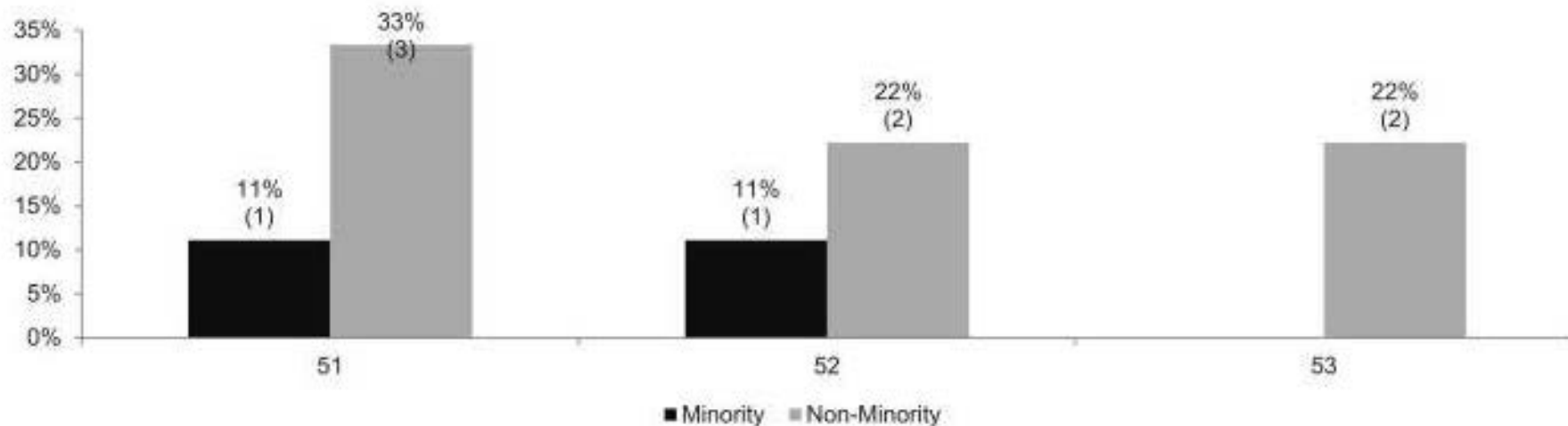**FY2012 Promotions by Minority/Non-Minority and 51-53 Series Pay Band**

Promotion Analysis

Supervision: Promotions by Minority/Non-Minority and Pay Band

FY2013 YTD Promotions by Minority/Non-Minority and Pay Band

FY2013 YTD Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis

Research: Promotions by Minority/Non-Minority and Pay Band

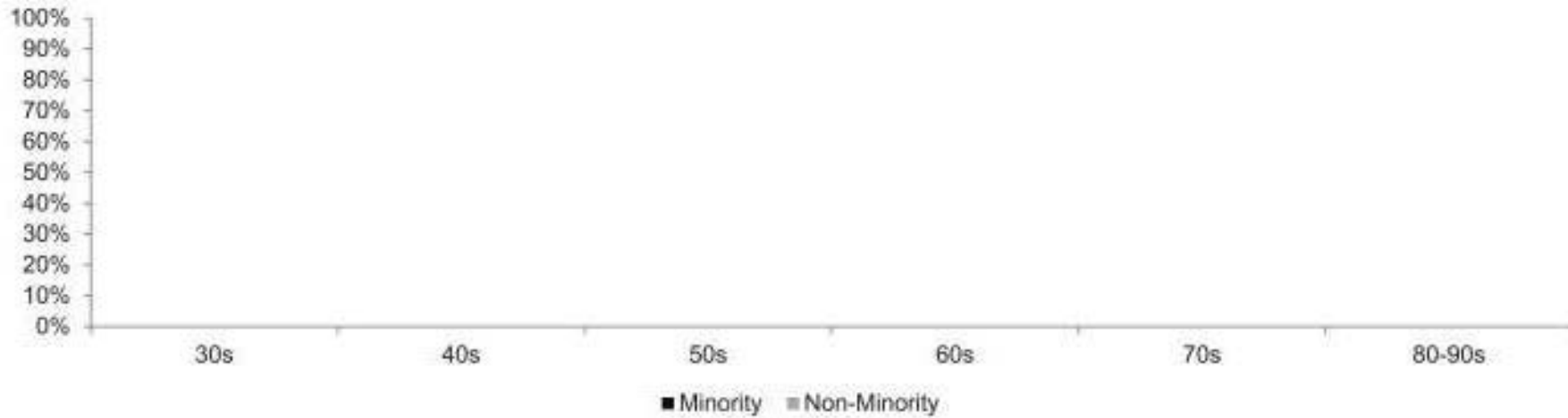**FY2011 Promotions by Minority/Non-Minority and Pay Band**

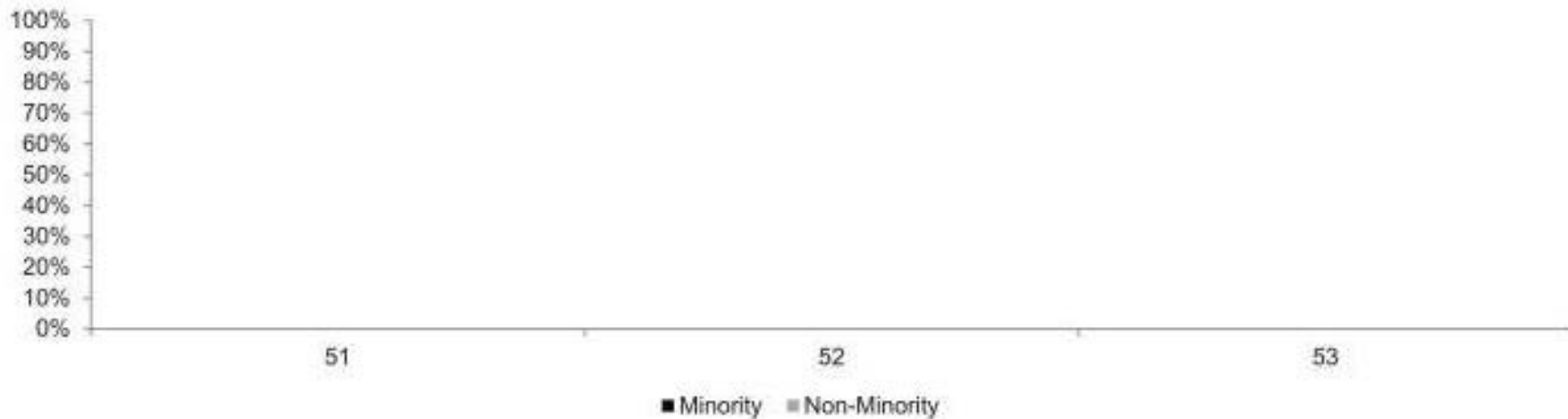**FY2011 Promotions by Minority/Non-Minority and 51-53 Series Pay Band**

Promotion Analysis
Research: Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis
Research: Promotions by Minority/Non-Minority and Pay Band

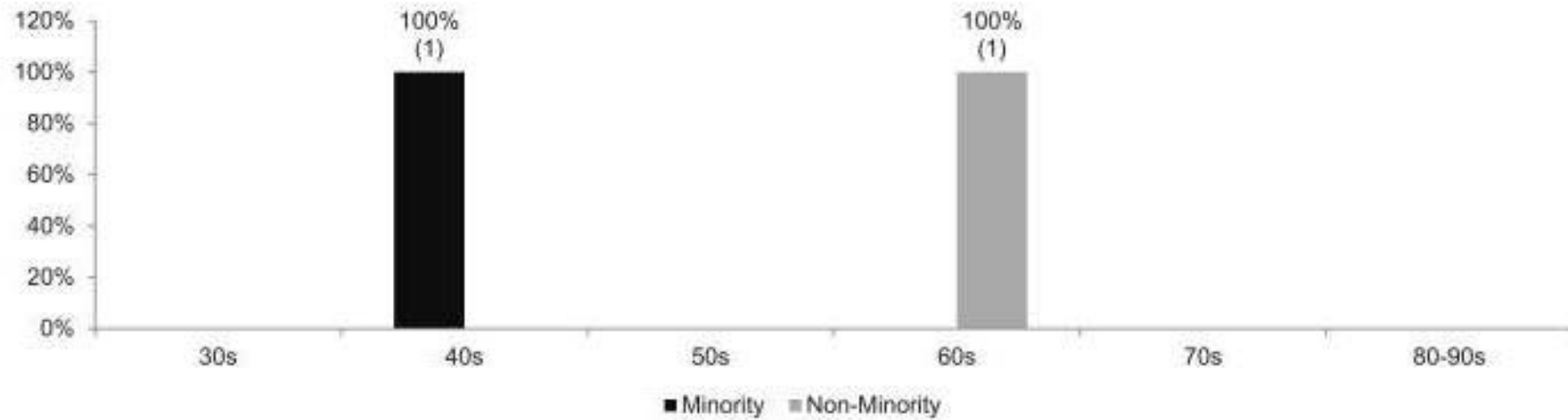## FY2013 YTD Promotions by Minority/Non-Minority and Pay Band

FY2013 YTD Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis

External Affairs: Promotions by Minority/Non-Minority and Pay Band

FY2011 Promotions by Minority/Non-Minority and Pay Band

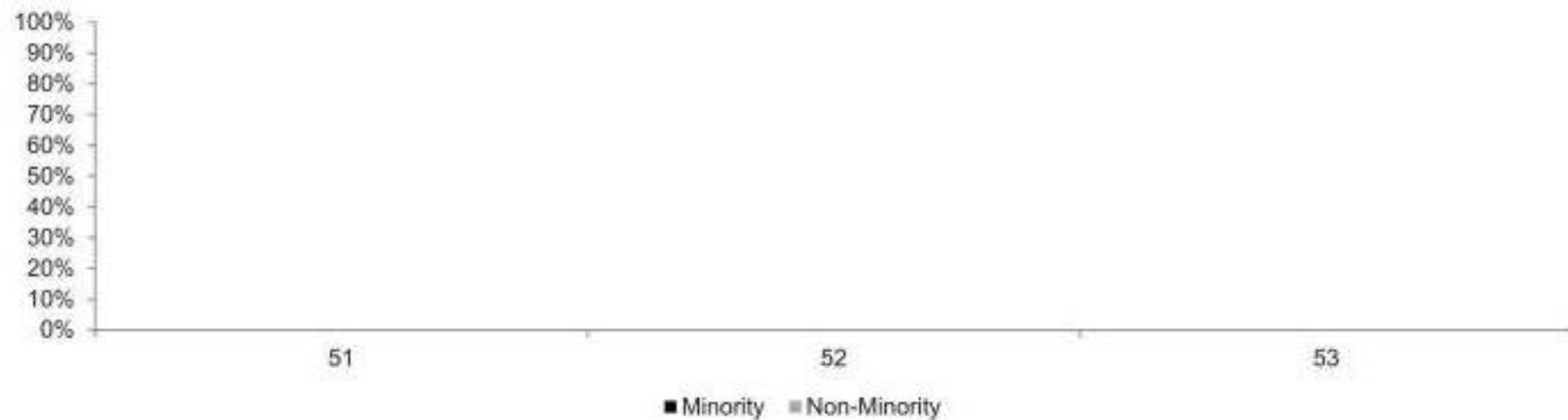**FY2011 Promotions by Minority/Non-Minority and 51-53 Series Pay Band**

100

Promotion Analysis
External Affairs: Promotions by Minority/Non-Minority and Pay Band

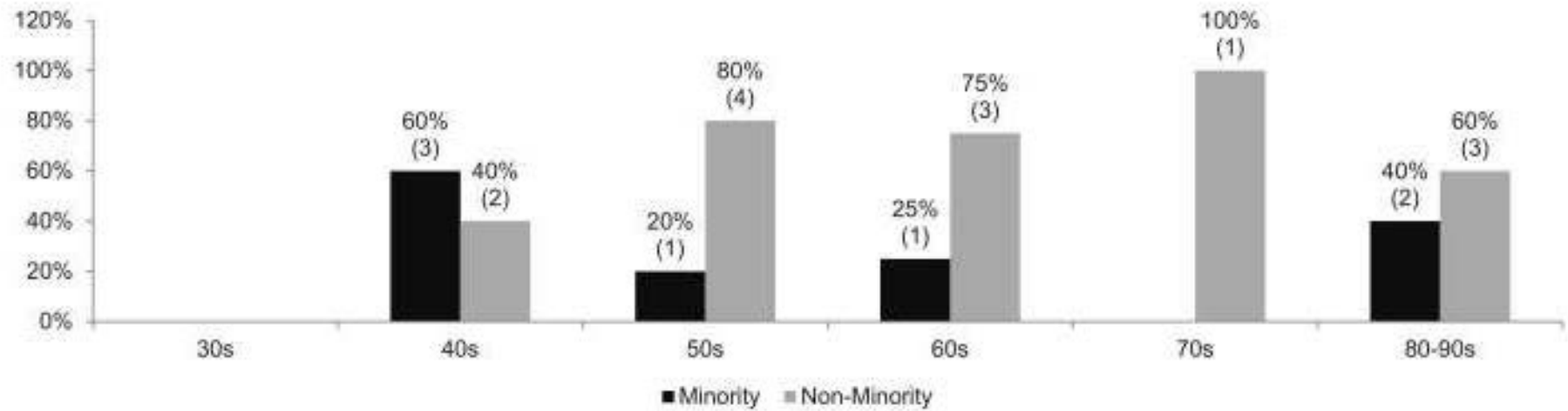## FY2012 Promotions by Minority/Non-Minority and Pay Band

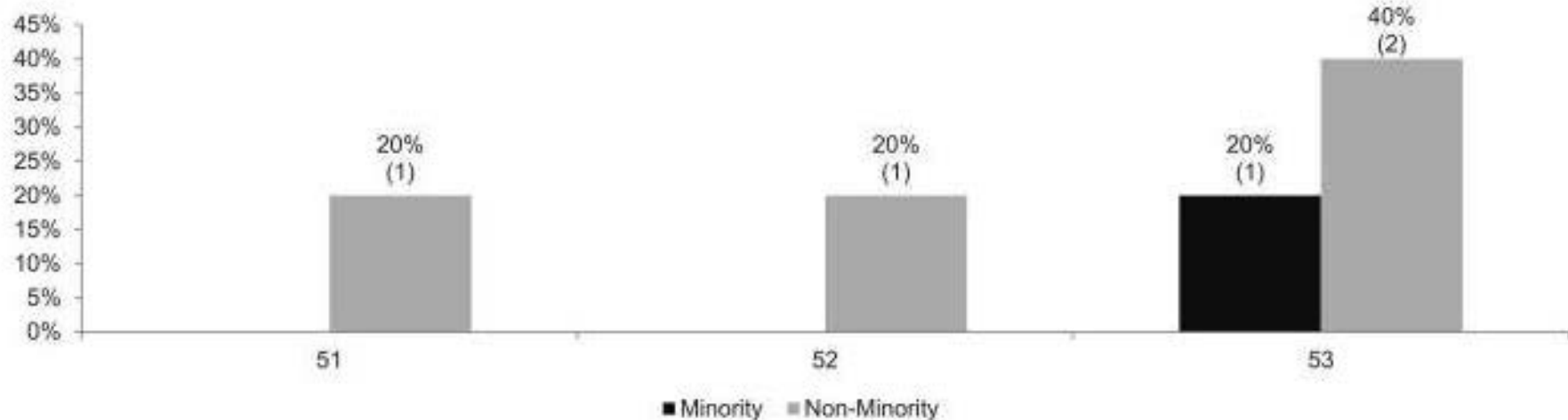## FY2012 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis

External Affairs: Promotions by Minority/Non-Minority and Pay Band

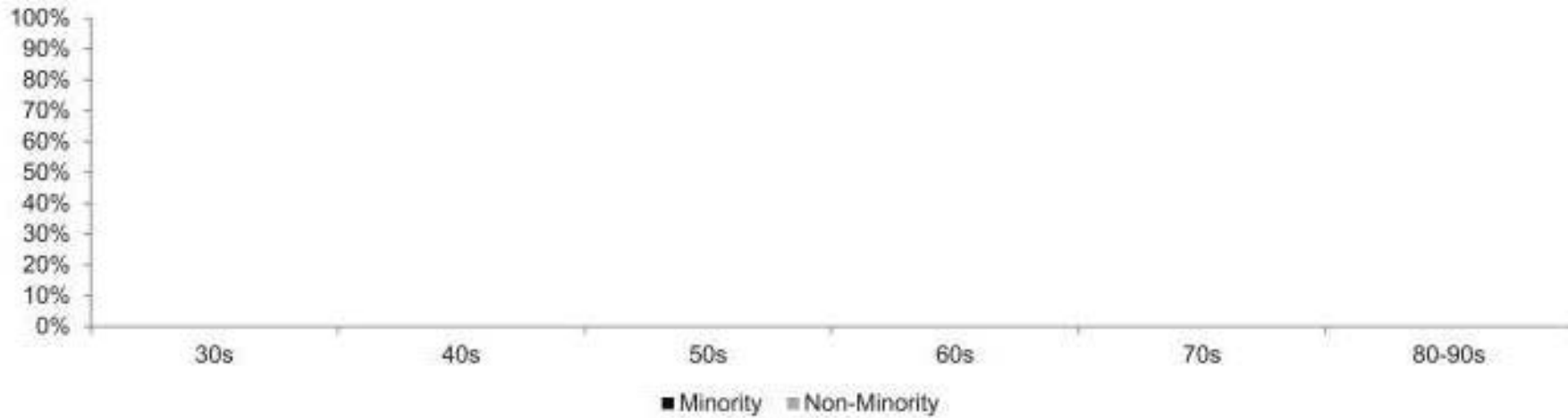**FY2013 YTD Promotions by Minority/Non-Minority and Pay Band**

FY2013 YTD Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis
Legal: Promotions by Minority/Non-Minority and Pay Band

FY2011 Promotions by Minority/Non-Minority and Pay Band

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

30s   40s   50s   60s   70s   80-90s

■ Minority   ■ Non-Minority

FY2011 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

51   52   53

■ Minority   ■ Non-Minority

Promotion Analysis
Legal: Promotions by Minority/Non-Minority and Pay Band

FY2012 Promotions by Minority/Non-Minority and Pay Band

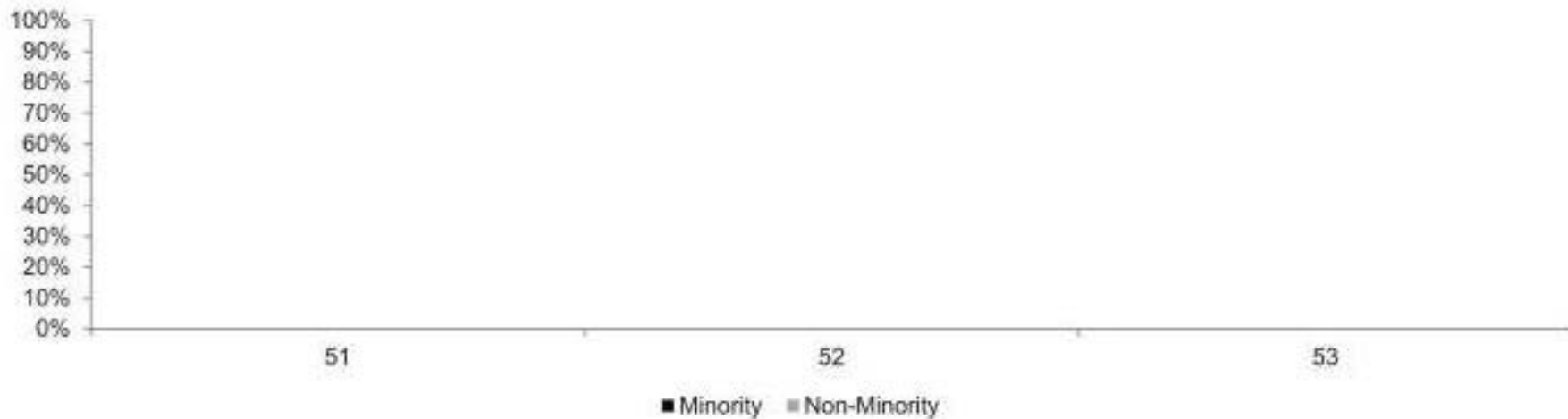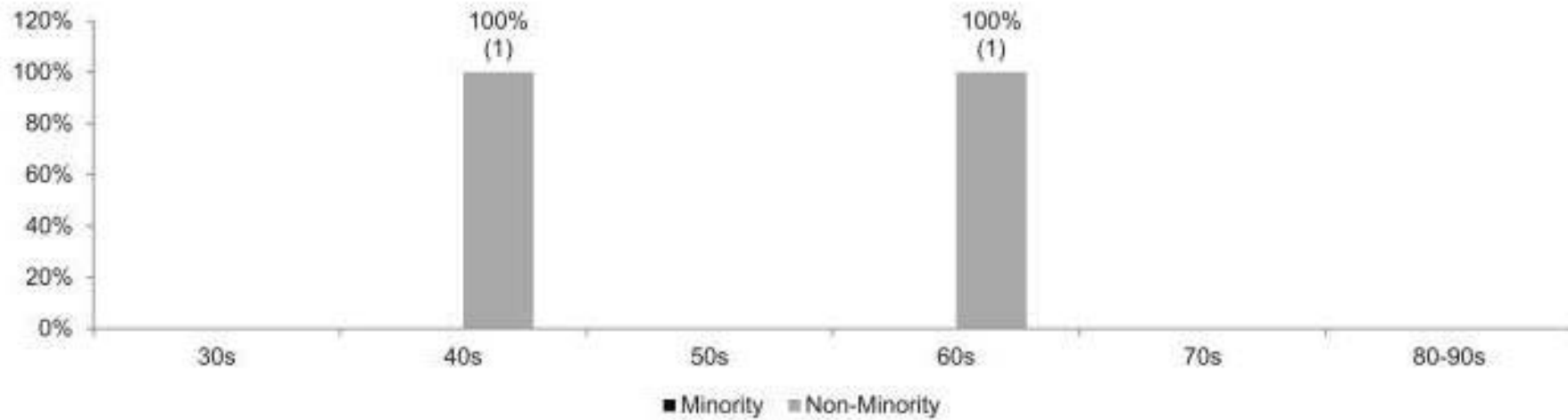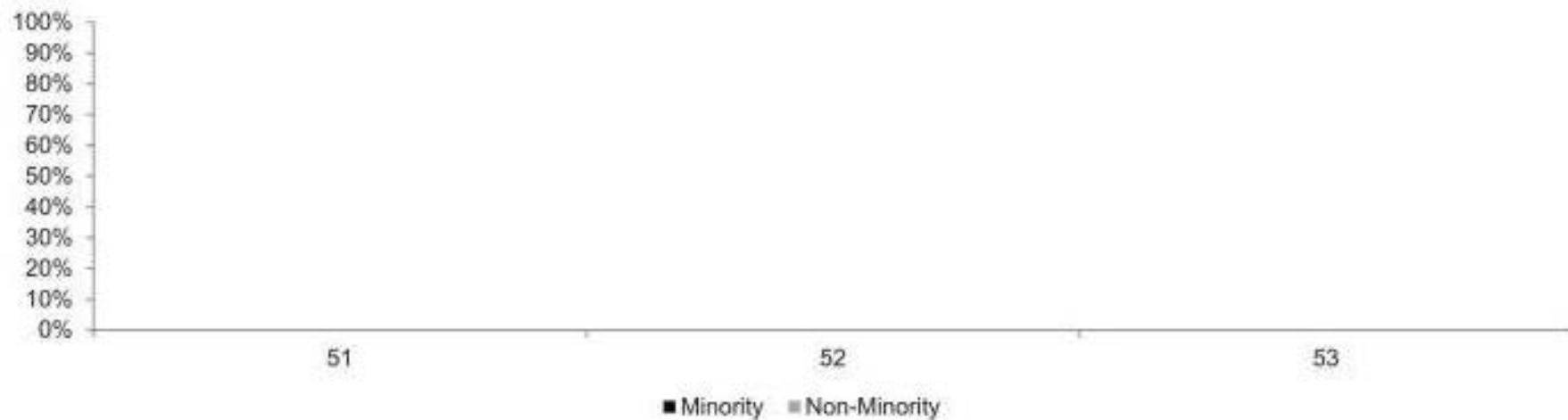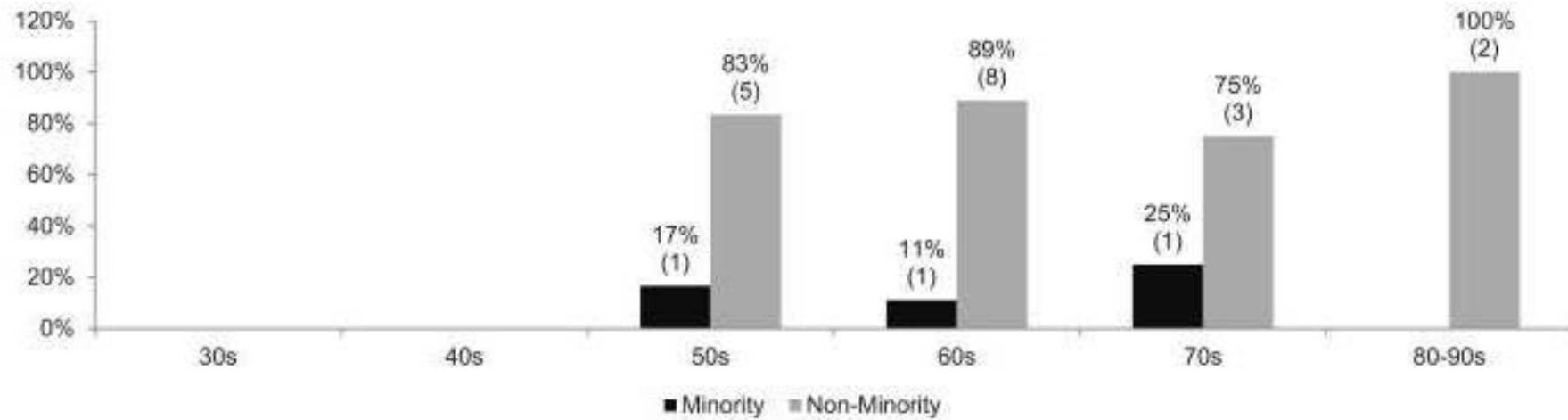## FY2012 Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Promotion Analysis
Legal: Promotions by Minority/Non-Minority and Pay Band

FY2013 YTD Promotions by Minority/Non-Minority and Pay Band

Legend: ■ Minority ■ Non-Minority

FY2013 YTD Promotions by Minority/Non-Minority and 51-53 Series Pay Band

Legend: ■ Minority ■ Non-Minority

Promotion Analysis
Promotions by Gender and Pay Band

FY2011 Promotions by Gender

100%					
90%					
80%					
70%					
60%					
50%					
40%					
30%					
20%					
10%					
0%	30s	40s	50s	60s	70s	80-90s

■ Female ■ Male

FY2011 Promotions by Gender and 51-53 Series Pay Band

51 Series

52 Series

53 Series

■

■

■

106

Promotion Analysis
Promotions by Gender and Pay Band

FY2012 Promotions by Gender

Female ■ Male

FY2012 Promotions by Gender and 51-53 Series Pay Band

■ Female ■ Male   ■ Female ■ Male   ■ Female ■ Male

Promotion Analysis
Promotions by Gender and Pay Band

FY2013 YTD Promotions by Gender

Legend: ■ Female ■ Male

FY2013 YTD Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis
Operations: Promotions by Gender and Pay Band

FY2011 Promotions by Gender

30s	40s	50s	60s	70s	80-90s

■ Female   ■ Male

FY2011 Promotions by Gender and 51-53 Series Pay Band

51
Series

52
Series

53
Series

Promotion Analysis
Operations: Promotions by Gender and Pay Band

FY2012 Promotions by Gender

FY2012 Promotions by Gender and 51-53 Series Pay Band

110

Promotion Analysis
Operations: Promotions by Gender and Pay Band

FY2013 YTD Promotions by Gender

FY2013 YTD Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis

Consumer Education: Promotions by Gender and Pay Band

FY2011 Promotions by Gender

FY2011 Promotions by Gender and 51-53 Series Pay Band

Promotion analysis

Consumer Education: Promotions by Gender and Pay Band

FY2012 Promotions by Gender

FY2012 Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis
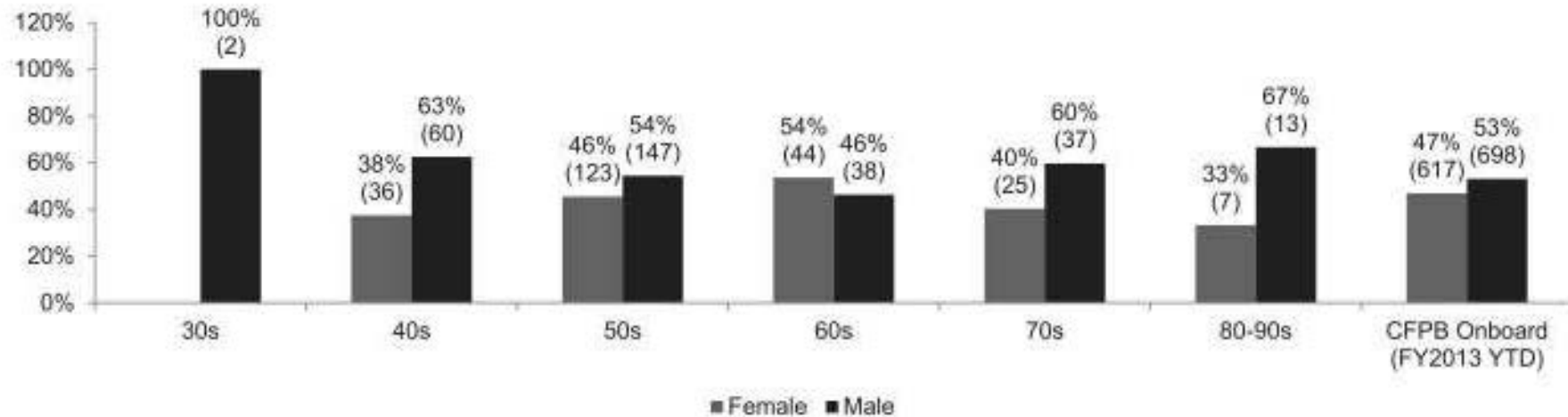*Consumer Education: Promotions by Gender and Pay Band*

FY2013 YTD Promotions by Gender

FY2013 YTD Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis
Supervision: Promotions by Gender and Pay Band

FY2011 Promotions by Gender

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

30s   40s   50s   60s   70s   80-90s

■ Female ■ Male

FY2011 Promotions by Gender and 51-53 Series Pay Band
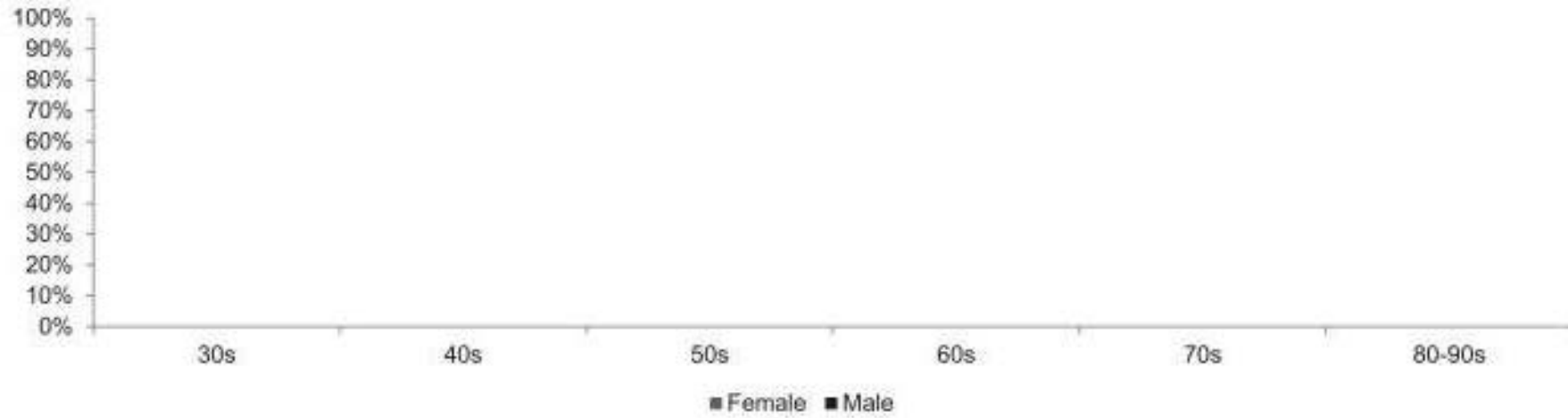

51
Series

52
Series

53
Series

115

Promotion Analysis
Supervision: Promotions by Gender and Pay Band

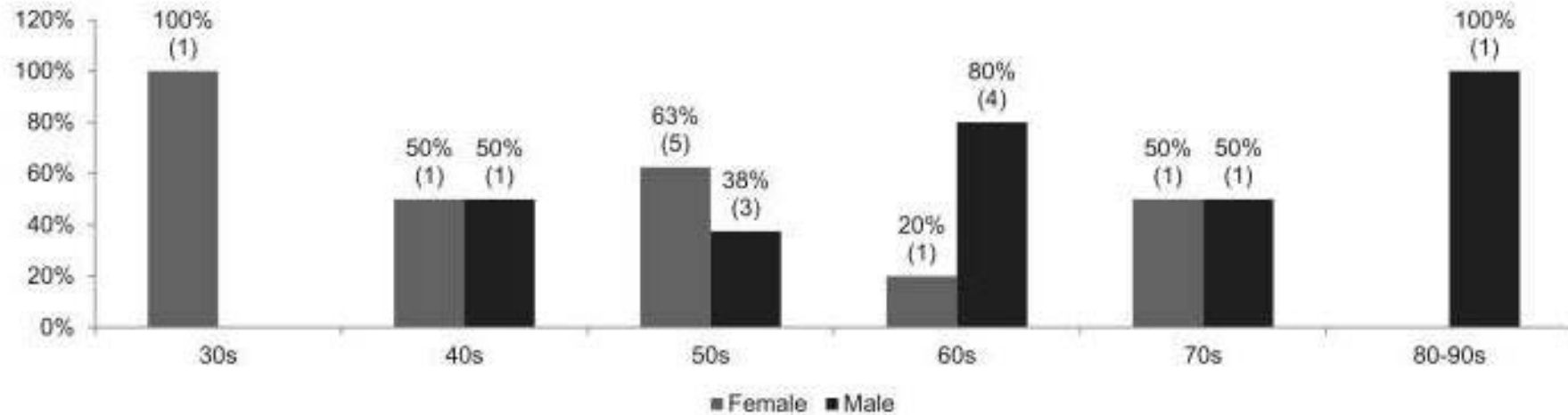## FY2012 Promotions by Gender

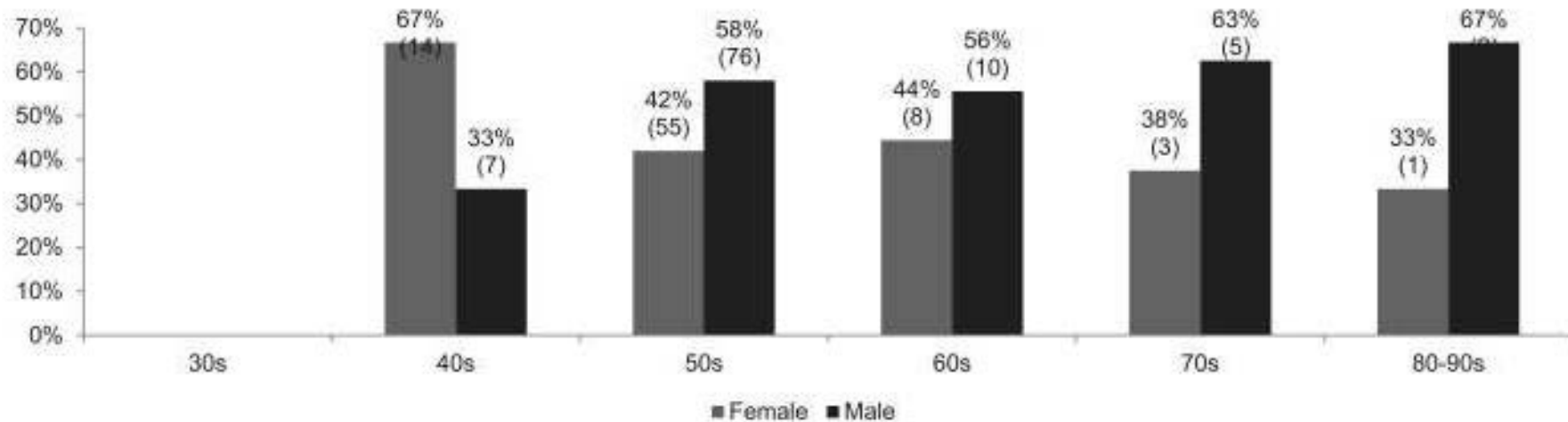

FY2012 Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis
Supervision: Promotions by Gender and Pay Band

FY2013 YTD Promotions by Gender

FY2013 YTD Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis
Research: Promotions by Gender and Pay Band

FY2011 Promotions by Gender

	30s	40s	50s	60s	70s	80-90s

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

■ Female ■ Male

FY2011 Promotions by Gender and 51-53 Series Pay Band

51 Series

52 Series

53 Series

■

■

■

Promotion Analysis
Research: Promotions by Gender and Pay Band

FY2012 Promotions by Gender

Legend: ■ Female ■ Male

FY2012 Promotions by Gender and 51-53 Series Pay Band

51 Series   ■ Female ■ Male

52 Series   ■ Female ■ Male

53 Series   ■ Female ■ Male

119

Promotion Analysis
Research: Promotions by Gender and Pay Band

FY2013 YTD Promotions by Gender

Legend: ■ Female ■ Male

FY2013 YTD Promotions by Gender and 51-53 Series Pay Band

51 Series — 22% (2)
Legend: ■ Female ■ Male

52 Series — 33% (3)
Legend: ■ Female ■ Male

53 Series — 11% (1), 11% (1)
Legend: ■ Female ■ Male

Promotion Analysis
External Affairs: Promotions by Gender and Pay Band

FY2011 Promotions by Gender

100%					
90%					
80%					
70%					
60%					
50%					
40%					
30%					
20%					
10%					
0%					
30s	40s	50s	60s	70s	80-90s

■ Female ■ Male

FY2011 Promotions by Gender and 51-53 Series Pay Band

51 Series

52 Series

53 Series

■

■

■

121

Promotion Analysis
External Affairs: Promotions by Gender and Pay Band

FY2012 Promotions by Gender

- Female ■ Male

FY2012 Promotions by Gender and 51-53 Series Pay Band

51
Series

52
Series

53
Series

Promotion Analysis
External Affairs: Promotions by Gender and Pay Band

FY2013 YTD Promotions by Gender

FY2013 YTD Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis
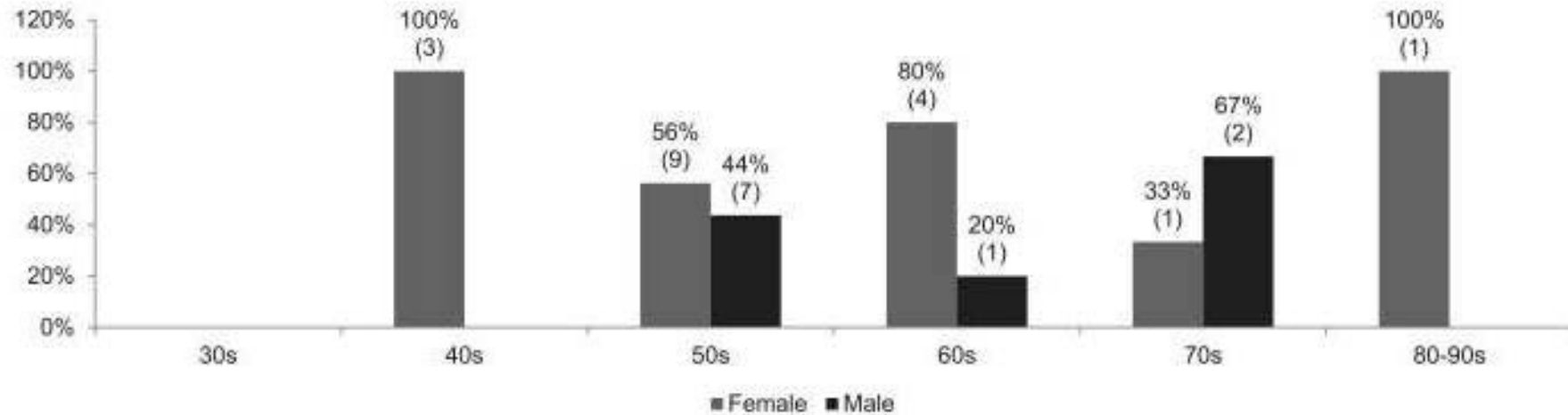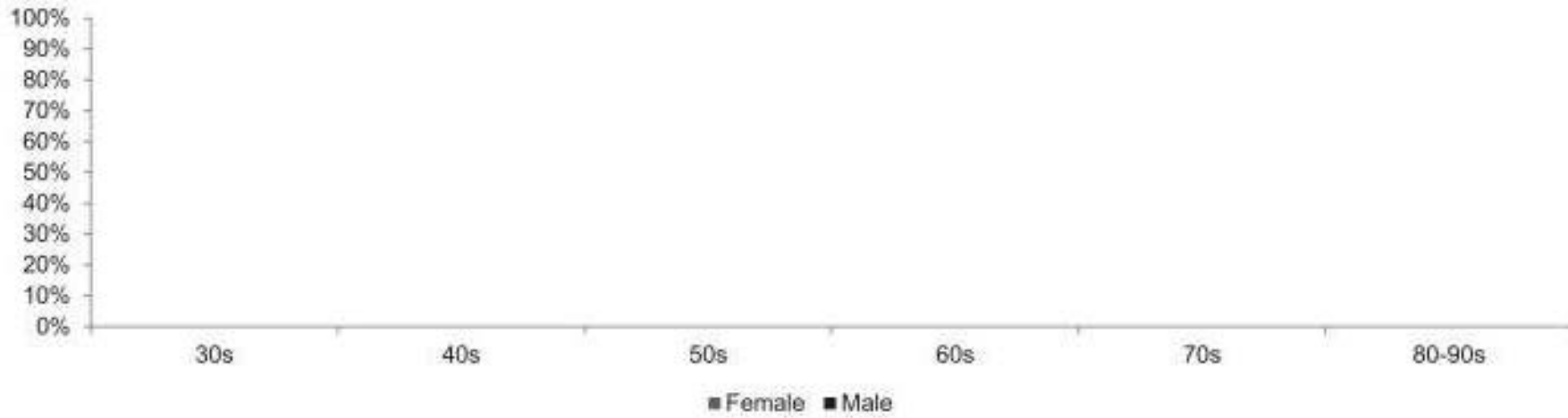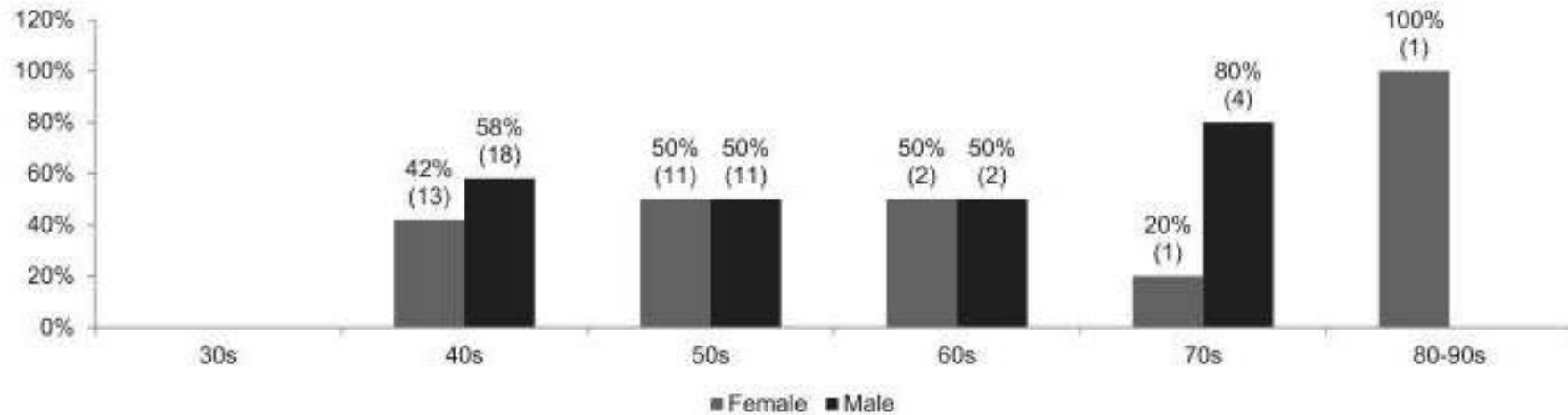*Legal: Promotions by Gender and Pay Band*

FY2011 Promotions by Gender

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

30s   40s   50s   60s   70s   80-90s

■ Female ■ Male

FY2011 Promotions by Gender and 51-53 Series Pay Band

51 Series

52 Series

53 Series

■

■

■

Promotion Analysis
Legal: Promotions by Gender and Pay Band

FY2012 Promotions by Gender
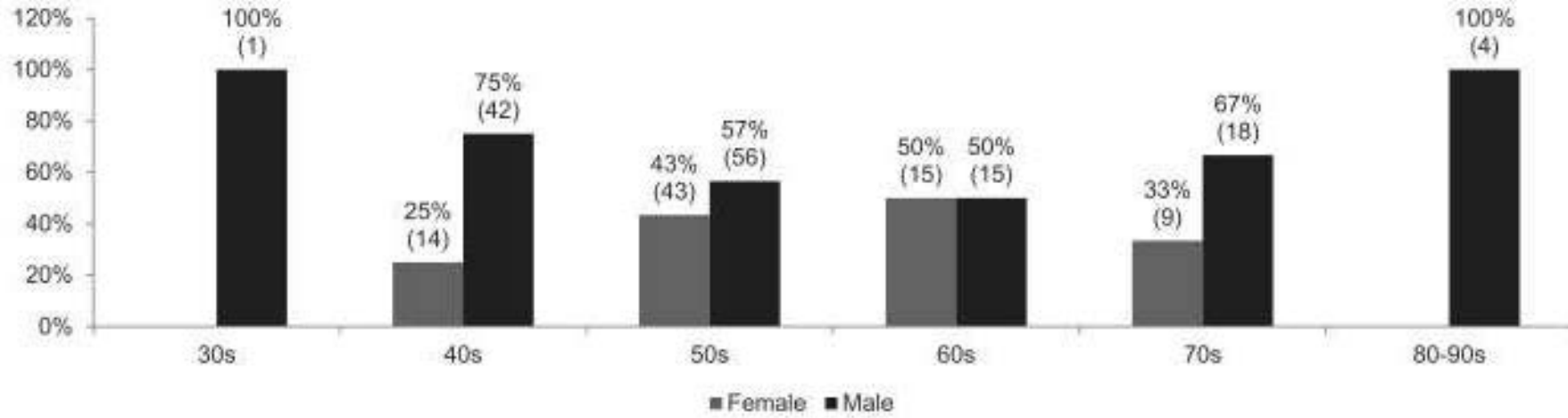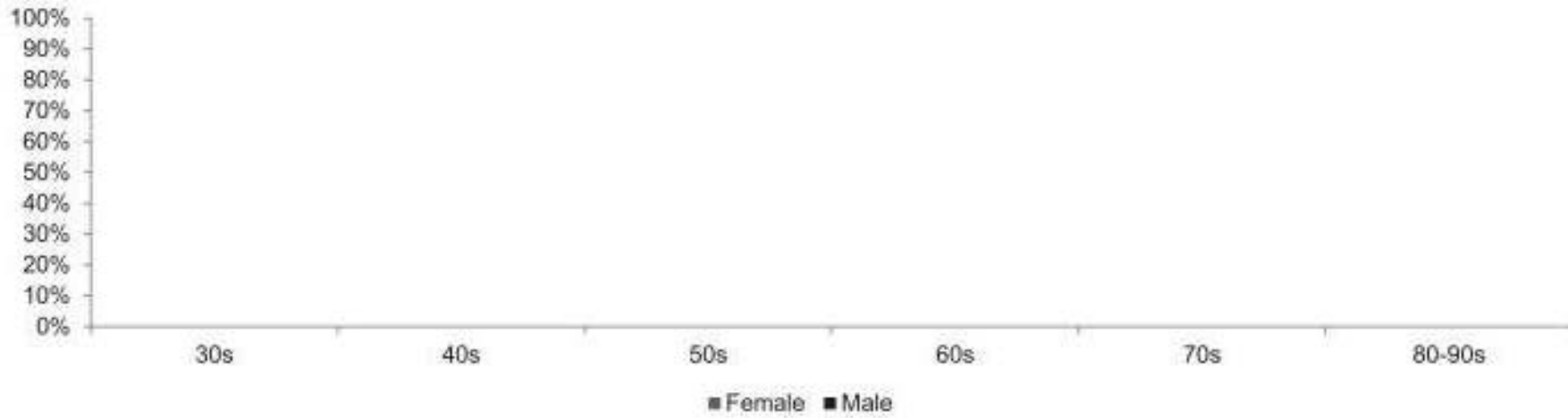

FY2012 Promotions by Gender and 51-53 Series Pay Band

Promotion Analysis
Legal: Promotions by Gender and Pay Band

FY2013 YTD Promotions by Gender

FY2013 YTD Promotions by Gender and 51-53 Series Pay Band

Consumer Financial Protection Bureau

Office of Minority and Women Inclusion (OMWI)

Diversity and Inclusion Assessment

Final Version

Deloitte.

Contents
Diversity and Inclusion Assessment

Executive Summary
Assessment Objectives and Key Findings

Assessment Objectives

- The Office of Minority and Women Inclusion (OMWI) at the Consumer Financial Protection Bureau (CFPB) has engaged Deloitte to establish a data-based approach to understanding the current state of diversity and inclusion (D&I) at the Bureau. Deloitte conducted a diversity audit to assess the CFPB's D&I environment, policies, and practices. To achieve this, Deloitte reviewed various data sources, including quantitative and qualitative data.

- The results of this report will help OMWI leadership gauge the current state of D&I internal to the CFPB, as well as shape future strategic decisions.

Key Findings

(b)(5)

Methodology and Approach

OMWI Timeline
Background Information and Major Milestones

Background Information

- The CFPB's Office of Minority and Women Inclusion (OMWI) was established through the Dodd-Frank Act, Section 342.
- The legislation outlined OMWI's mandate in the following ways:
  - Help the Bureau achieve diversity within the CFPB workforce.
  - Facilitate increased participation of women and minority owned businesses in Bureau contracting.
  - Develop standards for assessing the diversity policies and practices of regulated entities.

July 2010: *Dodd–Frank Wall Street Reform and Consumer Protection Act* passed

January 2012: CFPB OMWI Office established

April 2012: CFPB OMWI Director hired

2010   2011   2012   2013

July 2011: The Consumer Financial Protection Bureau (CFPB) established

March 2013: CFPB OMWI Annual Report submitted to Congress
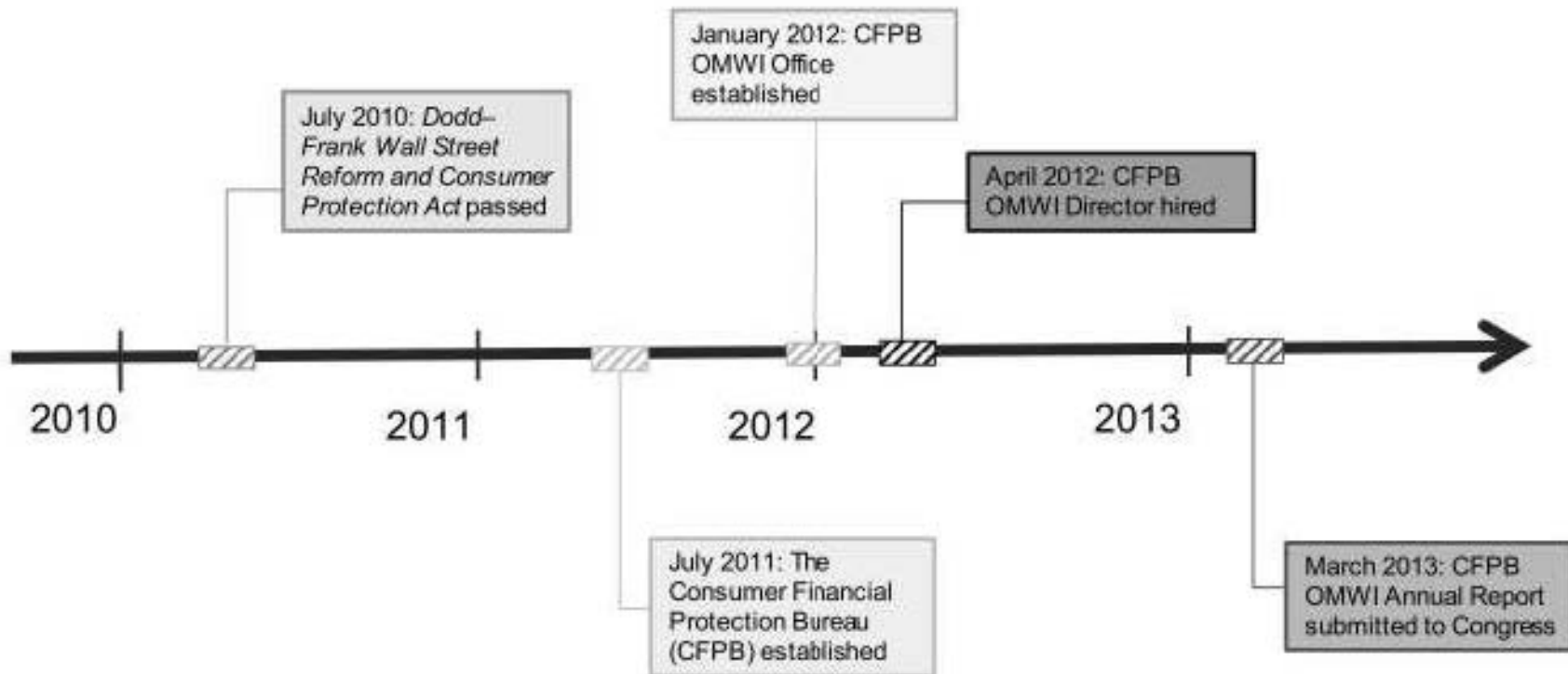
Data Collection and Analysis
Quantitative and Qualitative Sources

- To conduct the D&I assessment, the quantitative and qualitative sources listed below were used to develop key findings and recommendations.
- Deloitte used these data sources to evaluate specific criteria (from the Diversity and Inclusion Scorecard) to determine the CFPB's position on the D&I Maturity Curve.

Quantitative Sources

- Annual Employee Survey Data (2012 – 2013)
- Equal Employment Opportunity (EEO) Complaint Data
- Bureau of Labor Statistics Data (2011 Civilian Labor Force)
- Career Connector Data (FY2011 – 8/1/2013)
- Monster Analytics Recruitment Data (FY2011 – 8/1/2013)
- Workforce Analytics Systems Data (FY2011 – 8/1/2013)

Qualitative Sources

- 31 Leadership Interviews*
- 3 Employee Focus Groups**

Key Findings

OMWI Recommendations

*Leaders were identified by OMWI leadership and include the Director, Deputy Director, Division Directors, Assistant Directors, and Associate Directors.

**Confidence intervals were not used to compute sample size, however focus group participants were selected through random sampling.

Data Collection and Analysis
Qualitative Data Sources

Leadership Interviews

Discussion Topics
- CFPB business case for D&I
- D&I as part of culture
- Talent management
- Leader success profile
- Leadership learning and development
- Mentorship and sponsorship
- OMWI objectives and strategy
- D&I communications
- D&I management reporting
- Recommendations and suggestions for improvement

Leadership Participants
- Stephen Agostini, Chief Financial Officer (OPS)
- Steven, Antonakes, Deputy Director (Office of the Director)
- Stacey Bach, Acting Director (EEO)
- Marla Blow, Assistant Director (RMR)
- Camille Busette, Assistant Director (CEE)
- James Carley, Southeast Regional Director (SEFL)
- Edwin Chow, Western Regional Director
- Kelly Cochran, Assistant Director (RMR)
- Richard Cordray, Director (Office of the Director)
- Patrice Ficklin, Assistant Director (SEFL)
- Meredith Fuchs, Associate Director (Legal)
- Anthony Gibbs, Midwestern Regional Director (SELF)
- Roberto Gonzalez, Assistant Director (Legal)
- David Gragan, Chief Procurement Officer (OPS)
- Gail Hillebrand, Associate Director (CEE)

- Jenny Howard, Assistant Director (EA)
- Steve Kaplan, Northeastern Regional Director (SELF)
- Lisa Konwinski, Deputy Associate Director (EA)
- Richard Lepley, Assistant Director (Legal)
- Kent Markus, Assistant Director (SEFL)
- Zixta Martinez, Associate Director (EA)
- Julia McClung, Talent Management Lead (HC)
- Holly Petraeus, Assistant Director (CEE)
- Scott Pluta, Assistant Director (OPS)
- Paul Sanford, Assistant Director (SEFL)
- David Silbermann, Associate Director (RMR)
- Dennis Slagter, Chief Human Capital Officer (OPS)
- Liza Strong, Employee & Labor Relations Lead (OPS)
- Suzanne Tosini, Assistant Director (OPS)
- To-Quyen Truong, Assistant Director (Legal)
- Peggy Twohig, Assistant Director (SEFL)

Data Collection and Analysis
Qualitative Data Sources

Employee Focus Groups

Discussion Topics
- CFPB business case for D&I
- D&I as part of culture
- Talent management
- Role of D&I in day-to-day employee experience
- Work-life balance
- Training
- Leadership development
- Mentorship and sponsorship
- OMWI objectives and strategy
- D&I communications
- Recommendations and suggestions for improvement

Focus Group Sessions
- Random sampling of 30 employees
  - One focus group for non-supervisory employees from the Supervision division (Washington, DC)
  - Two focus groups for all other non-supervisory employees at HQ (Washington, DC)

Diversity and Inclusion Scorecard
Evaluation Criteria and Scores

- The Diversity and Inclusion Scorecard outlines the focus areas aligned to the four phases of the Maturity Curve.
- Deloitte evaluated each focus area and assigned a score based on the findings.
- Specific key findings and recommendations are detailed for each focus area that was evaluated.

Tactical Focus   ⟶   *Strategic Focus*

| **Compliant** | **Mono-cultural** | **Multicultural** | **Inclusive** |

(b)(5)

Diversity and Inclusion Maturity Curve
Four Phases of Maturity

- To achieve the business value of Diversity and Inclusion, organizations typically move through four phases of maturity.
- Each leader and focus group participant was asked to plot **where they believed the CFPB is positioned on the Maturity Curve**. The results are indicated by the colored stars below.
- Deloitte's assessment of where the CFPB falls on the Maturity Curve is based on our evaluation of the CFPB's scores in the key programmatic areas defined in the D&I Scorecard.

Inclusive

The inclusive organization believes diversity and inclusion **improves business performance**. The successfully organization **applies the capabilities** that everyone in the organization brings with them.

Multicultural

The multicultural organization includes a **diverse mix of employees** with differences in ethnicity, gender, age, etc.

This organization still **struggles to optimize its diversity.**

Mono-cultural

The mono-cultural organization is one that may have a diverse workforce, but it primarily **values the majority culture.**

Compliant

The compliant organization prioritizes workforce diversity and is a **numbers-based** organization.

This organization needs to focus on more than **demographic composition gaps.**

★	Leadership Perspective
★	Employee Perspective
★	Deloitte Assessment

Tactical Focus ——————————— *Time* ——————————→ *Strategic Focus*

Report Structure

For the purposes of this report and to facilitate the implementation of the recommendations, the findings around the key focus areas from the D&I Scorecard are integrated into the following three categories: Employee Lifecycle, Leadership, and Organization.*

CFPB Employee Life Cycle

CFPB Leadership

OMWI Organization

(b)(5)

*The findings of this report focus on internal CFPB D&I programs and do not include findings specific to supplier diversity or regulated entities.

CFPB Employee Life Cycle

Demographic Composition
Ethnicity, Minority Status, and Gender

FY2013 YTD Ethnicity Distribution

Hispanic 5.49% (71)

Two or More Races 2.94% (38)

Native Hawaiian / Pacific Islander 0.15% (2)

Black 15.92% (206)

Asian 9.35% (121)

American Indian / Alaska Native 0.23% (3)

White 65.92% (853)

FY2013 YTD Pay Band Distribution by Minority/Non-Minority

Pay Band	Minority	Non-Minority
30s	38% (49)	62% (81)
40s	54% (79)	46% (67)
50s	37% (193)	63% (322)
60s	24% (59)	76% (185)
70s	23% (43)	77% (148)
80-90s	23% (10)	77% (33)
CFPB	34% (441)	66% (853)
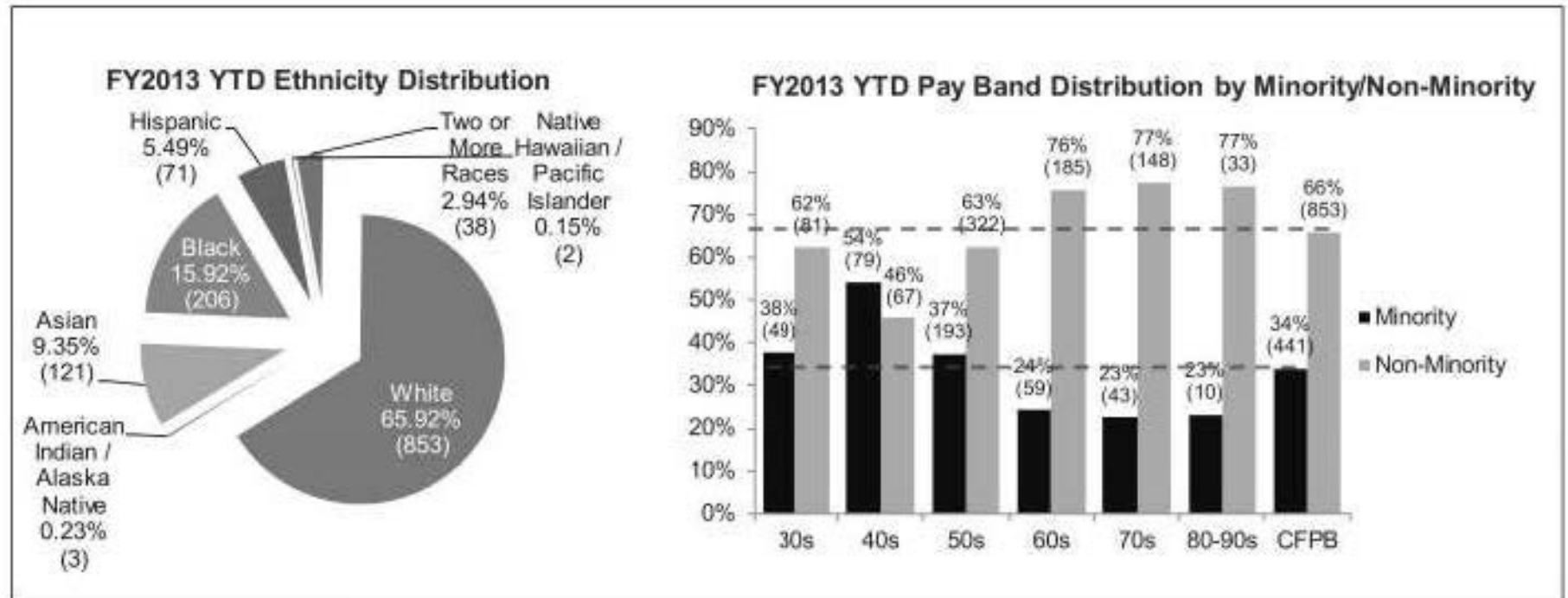
Overall Findings

(b)(5)

- The chart on the right breaks out the minority/non-minority distribution by pay band and compares the distribution of each pay band to the Bureau level distribution. (b)(5)

(b)(5)

- FY2013 data is through 8/1/2013

Demographic Composition
Ethnicity, Minority Status, and Gender

FY2013 YTD Workforce Gender Breakdown

FY2013 YTD Pay Band Distribution by Gender

*Excludes 20s pay band

Overall Findings

(b)(5)
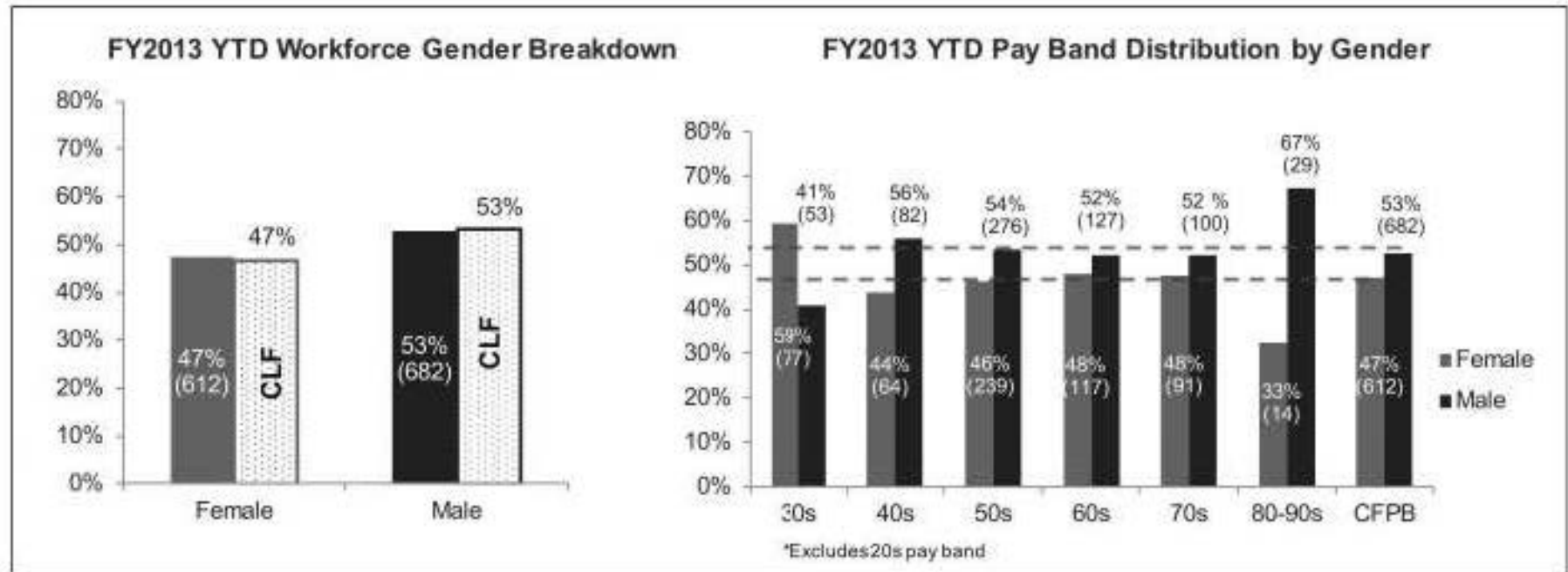
- FY2013 data is through 8/1/2013

Demographic Composition
Generational Groups

| Millennials/
Generation Y
Born: 1980-2000 | | **Generation X**
Born: 1965-1979 | | **Baby Boomers**
Born: 1946-1964 | | **WWII Generation**
Born: 1945 & before |

Percentage of workforce

50%
40%
30%
20%
10%
0%

33.2%
(430)

41.5%
(537)

24.8%
(321)

0.5%
(6)

(b)(5)
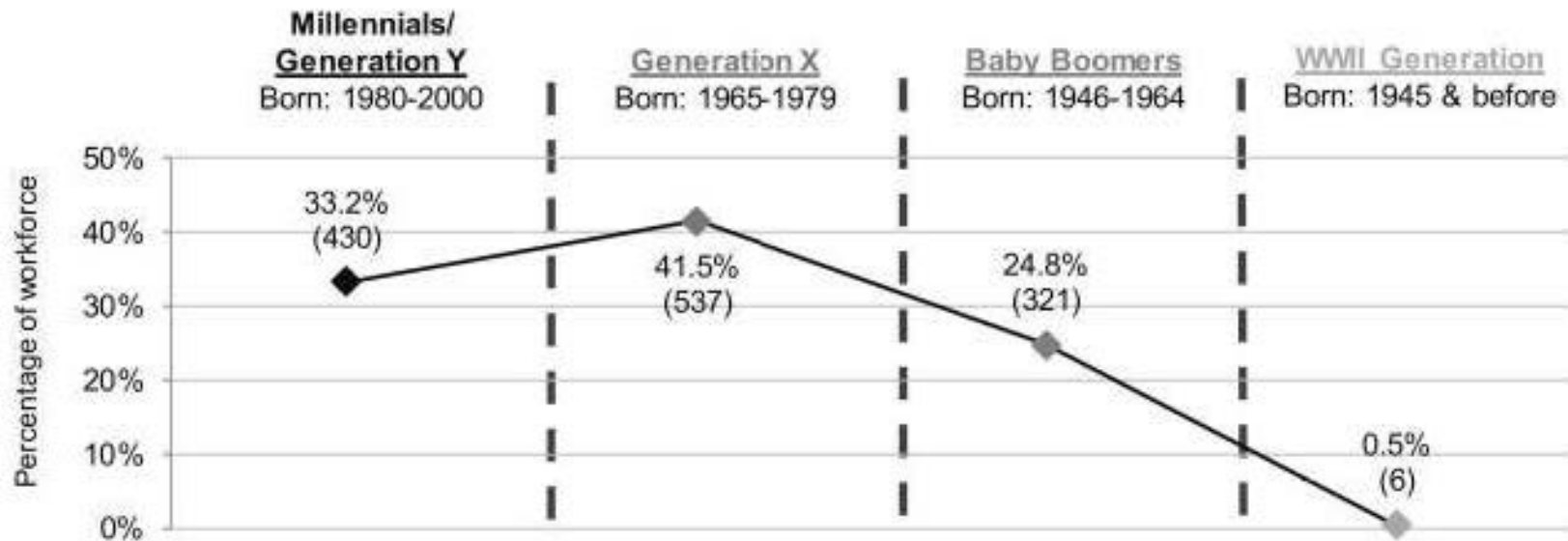
Work Values	
Communication Preferences	
Teamwork Style	
Ideal Rewards	
Ideal Job Design	

15 - Based on data from 8/1/2013

Demographic Composition
Findings

(b)(5)

Demographic Composition
Derivation of Current CFPB Workforce

Data Limitations

- The Deloitte team intended to analyze total hires by ethnicity for FY2011 to FY2013 YTD, total attrition by ethnicity for FY2011 to 2013 YTD, and current workforce by ethnicity.
- The goal was to illustrate whether CFPB is net +/- for each ethnicity category YTD.
- The analysis was hampered by the following data challenges:
    - *Reconciliation between aggregate hiring by ethnicity and aggregate attrition data by ethnicity across the three years did not match the current workforce population.* The Deloitte team recognized that the aggregate hiring by ethnicity data for the past three years minus the aggregate attrition by ethnicity data for the past three years should equal the current workforce population, but this was not the case.
        - *Hispanics that identify with a secondary ethnicity are coded differently across the three years.* From FY2011 to FY2012, Hispanics that identified with multiple ethnicities were coded to "Two or More Races." However, in FY2013, Hispanics that identified with multiple ethnicities were coded to Hispanic – "Insert Ethnicity." The Deloitte team consulted with OMWI and they confirmed that this change occurred in FY2013.
        - *Employees that did not self-report ethnicity during the hiring process were defaulted to "White" within the data system.* In consultation with OMW and HC, we discovered that employees did not have to self-report their ethnicity and as a result, were given a "White" ethnicity designation within the data system. The Deloitte team met with OHC staff to determine when this process started and ended, but was unable to verify the actual dates.

Demographic Composition
Recommendations

Overall Recommendations

(b)(5)

Hiring
Minority Applicant Flow

FY2011-FY2013 Minority Applicant Flow

*18,005 from application pool reported race undefined
**Applicant information does not account for transferees

Overall Findings

(b)(5)
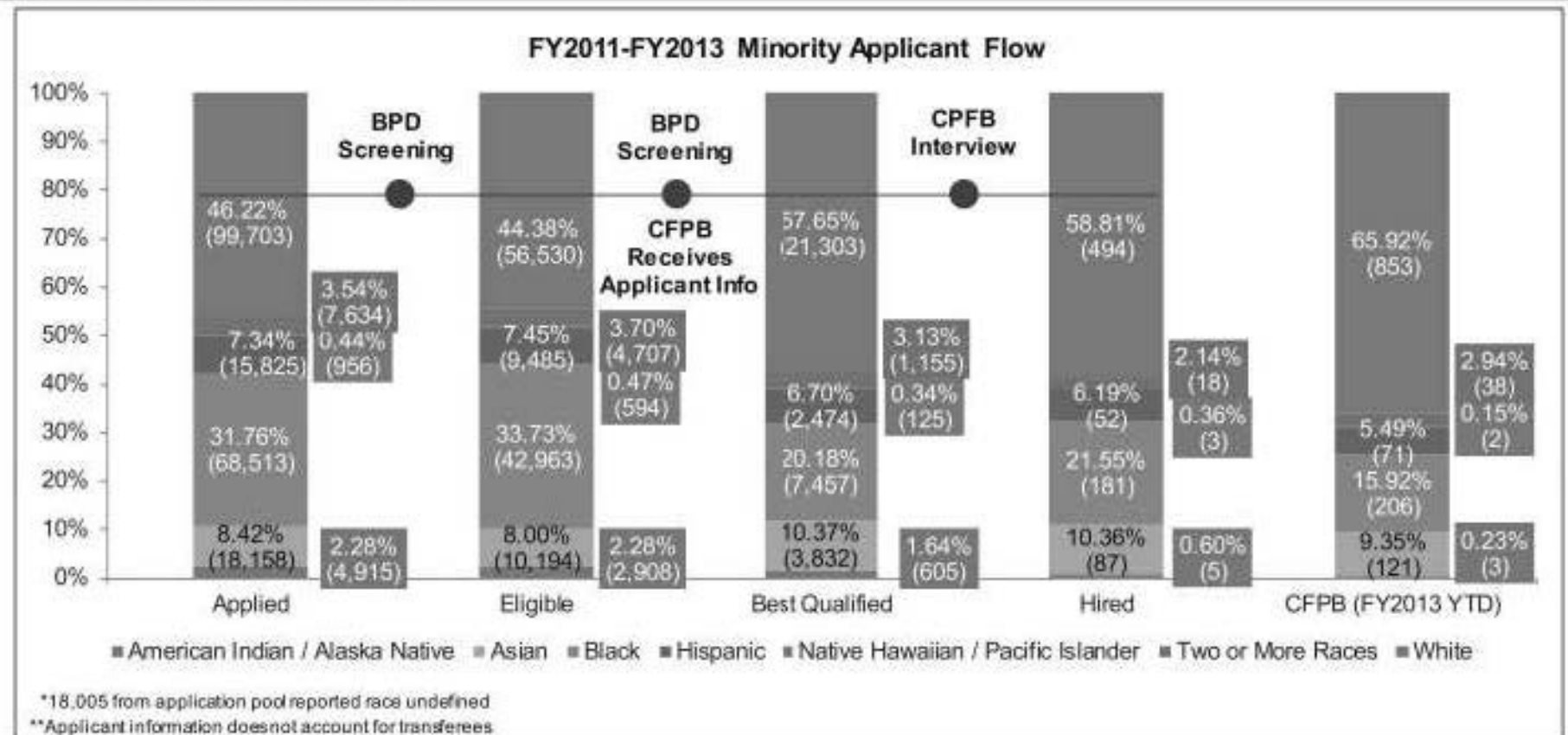
- FY2013 data is through 8/1/2013

Hiring

Minority Applicant Flow Ratio Analysis

FY2011-FY2013 Minority Applicant Flow Ratio Analysis

	Eligible/Applied	Best Qualified/Applied	Hired/Applied
American Indian / Alaska Native	590:1,000	120:1,000	1:1,000
Asian	560:1,000	210:1,000	5:1,000
Black	630:1,000	110:1,000	3:1,000
Hispanic	600:1,000	160:1,000	3:1,000
Native Hawaiian / Pacific Islander	620:1,000	130:1,000	3:1,000
Two or More Races	620:1,000	150:1,000	2:1,000
White	570:1,000	210:1,000	5:1,000

* All numbers are rounded to whole numbers.

Overall Findings

- The table above displays the ratio of applicants per ethnic category across the three major phases of the application process: Eligible, Best Qualified, and Hired.

(b)(5)

- FY2013 data is through 8/1/2013

Hiring
Gender Applicant Flow

FY2011-FY2013 Gender Applicant Flow

*9,712 from Application Pool reported Gender Undefined
**Applicant information does not account for transferees

Overall Findings

(b)(5)
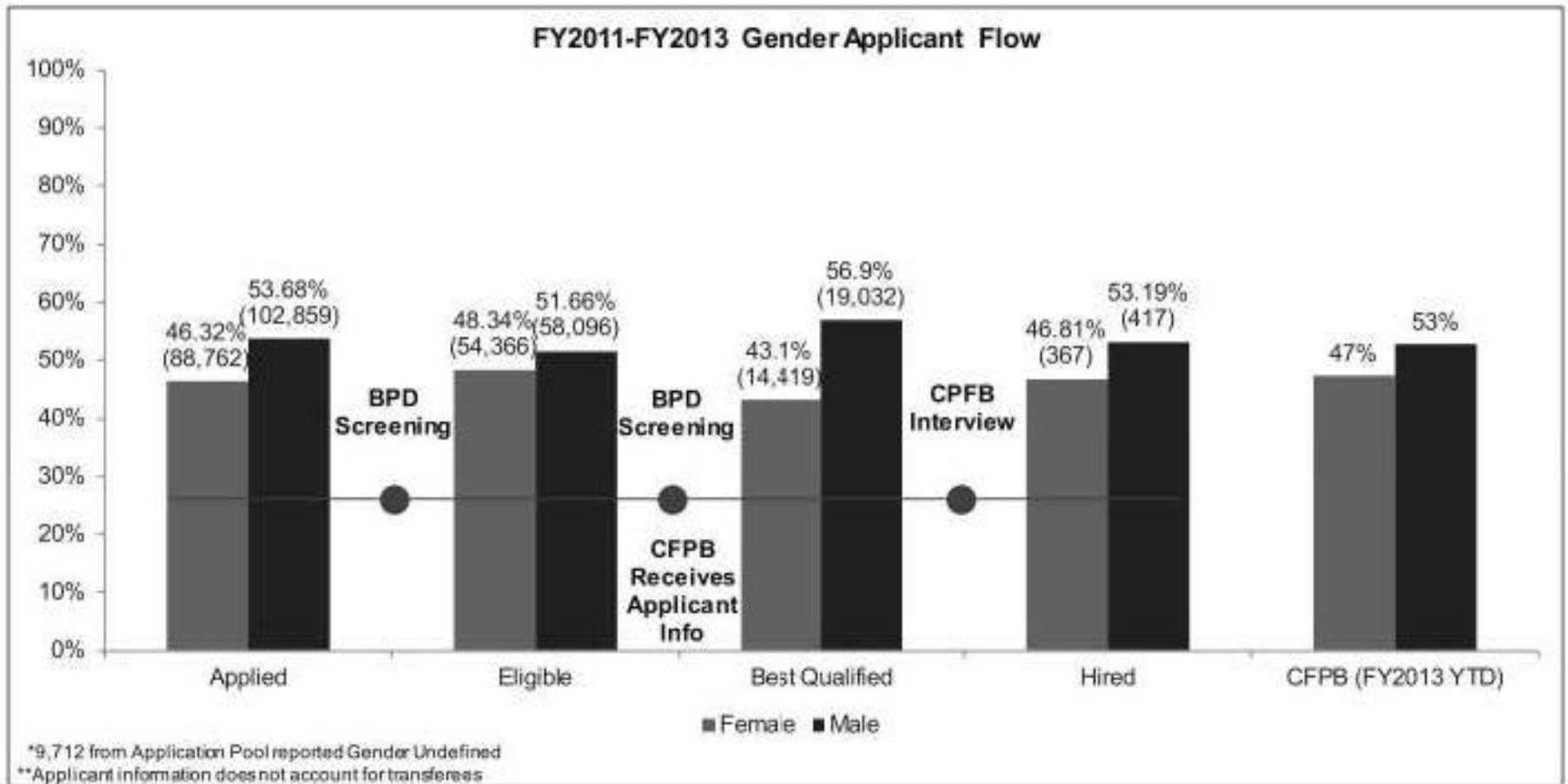
- FY2013 data is through 8/1/2013

Hiring
Gender Applicant Flow Ratio Analysis

FY2011-FY2013 Gender Applicant Flow Ratio Analysis

	Eligible/Applied	Best Qualified/Applied	Hired/Applied
Female	610:1,000	160:1,000	4:1,000
Male	560:1,000	190:1,000	4:1,000

* All numbers are rounded to whole numbers.

Overall Findings

- The table above displays the ratio of applicants per gender category across the three major phases of the application process: Eligible, Best Qualified, and Hired.

(b)(5)

- FY2013 data is through 8/1/2013

22

Hiring
Findings

(b)(5)

Hiring
Recommendations

Overall Recommendations

(b)(5)

24

Promotion Parity
Promotions by Minority/Non-Minority and Pay Band

Key Findings

- In the chart below, promotions are calculated examining changes in pay grades from FY2012 to FY2013. This method was used due to lack of clarity around promotion data in the BPD system (additional detail on slide 27).

(b)(5)

FY2013 YTD Promotions by Minority/Non-Minority and Pay Band

- FY2013 data is through 8/1/2013
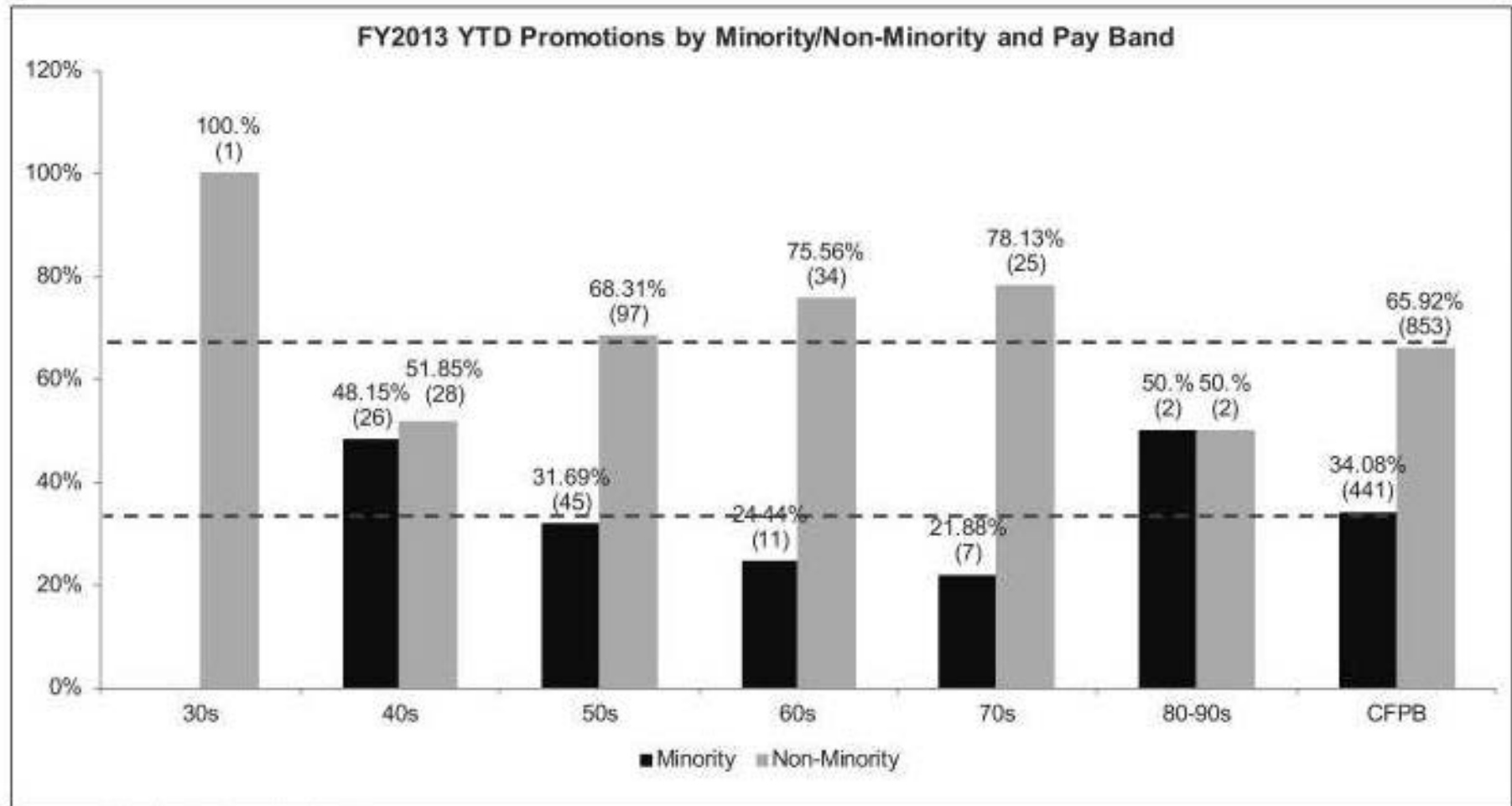
Promotion Parity
Promotions by Gender and Pay Band

Key Findings

- In the chart below, promotions are calculated examining changes in pay grades from FY2012 to FY2013. This method was used due to lack of clarity around promotion data in the BPD system (additional detail on slide 27).

(b)(5)

FY2013 YTD Promotions by Gender and Pay Band

- Female - Male
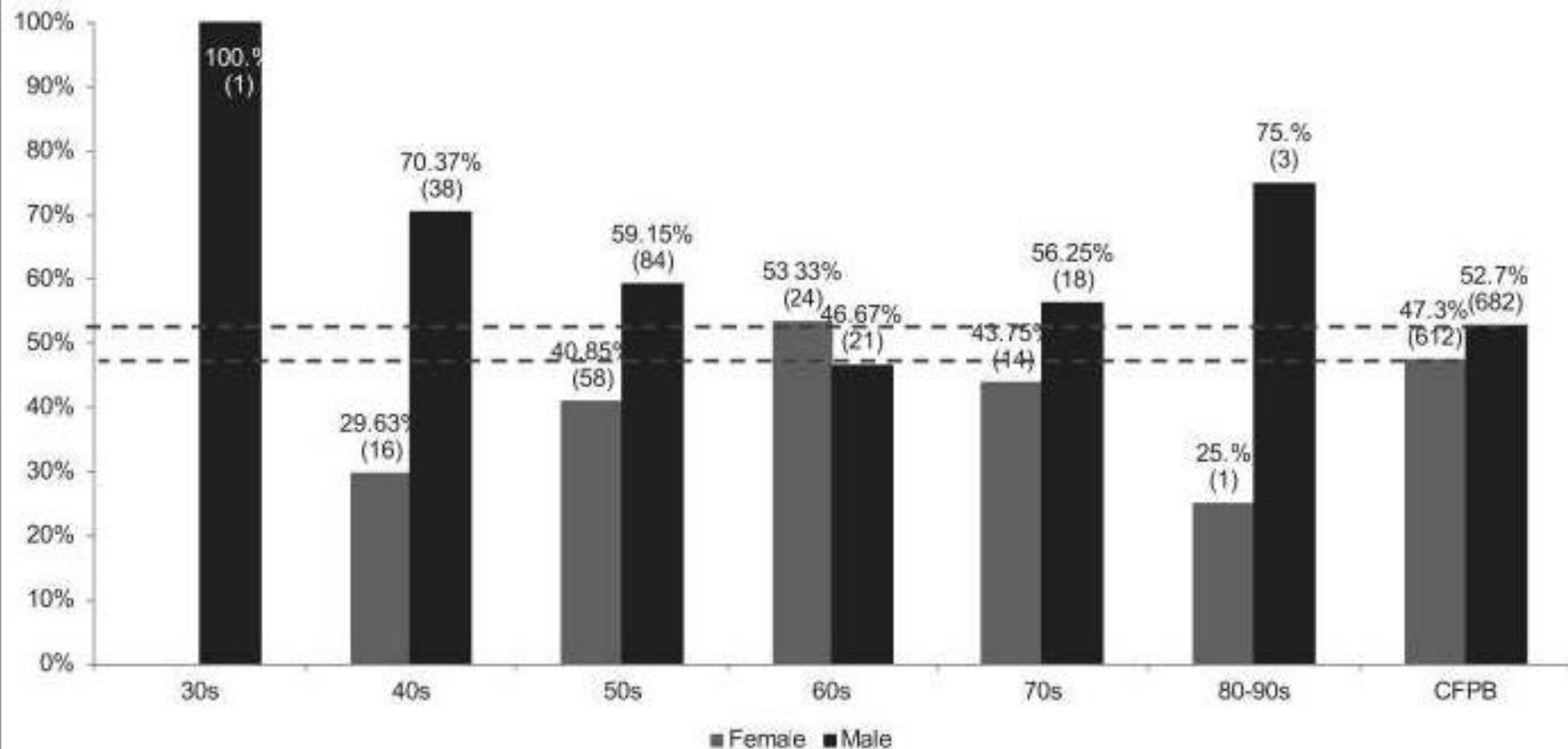
- FY2013 data is through 8/1/2013

Promotions Parity
Findings

Overall Findings

From the Quantitative Data

- The Deloitte team embarked on the promotion analysis with the intention of analyzing competitive promotions since non-competitive overstate CFPB's overall minority and women promotion rate.
- The goal was to assess promotions for fiscal years 2011, 2012, and 2013 year to date.

(b)(5)

Promotions Parity
Recommendations

Overall Recommendations

(b)(5)

Attrition and Retention
Attrition by Ethnicity and Division

FY2011-FY2013 YTD Attrition Rate by Minority/Non Minority

FY2011: Minority 0.87% (2), Non-Minority 3.3% (15)
FY2012: Minority 7.89% (28), Non-Minority 13.67% (101)
FY2013 YTD: Minority 7.26% (32), Non-Minority 6.68% (57)

■ Minority ■ Non-Minority
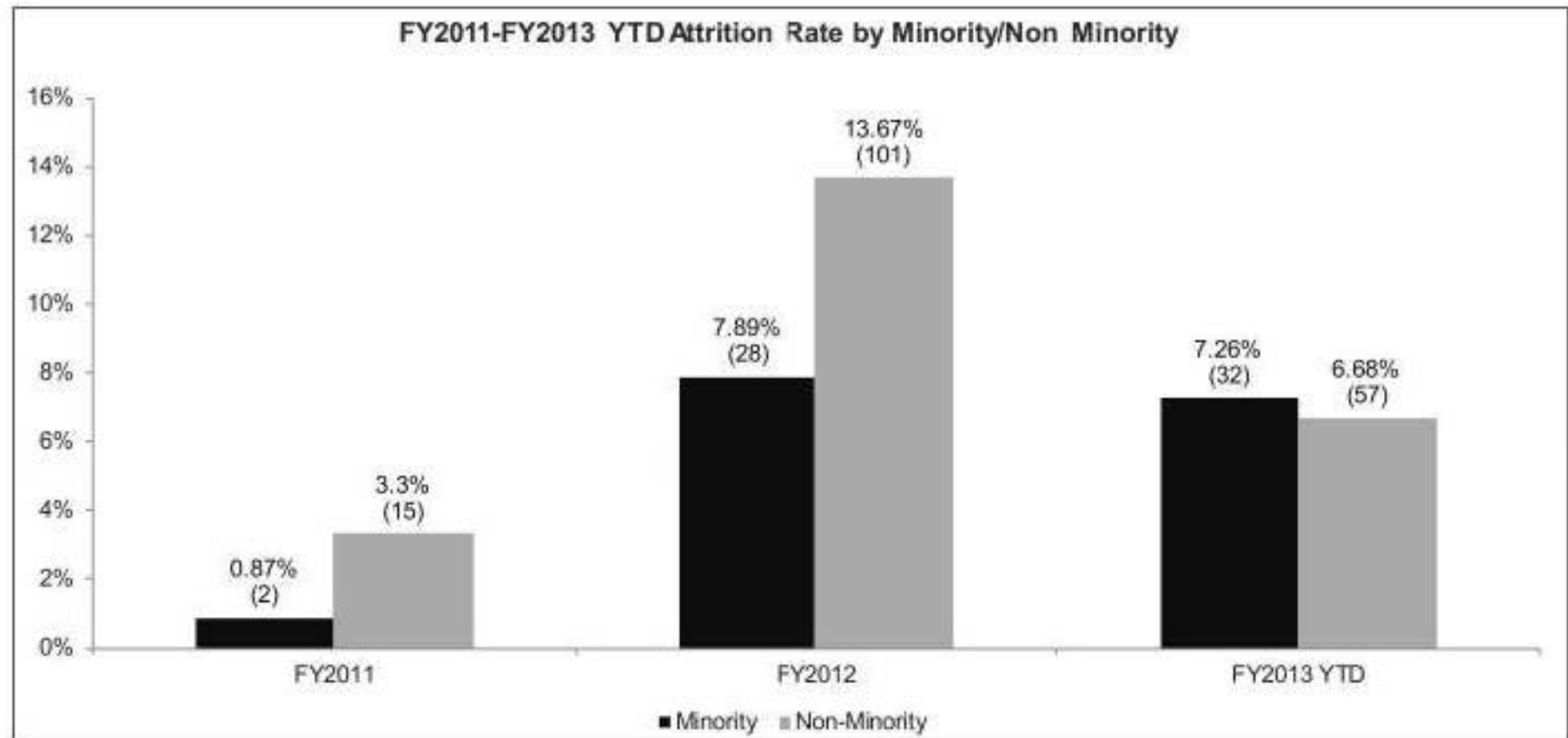
Overall Findings

- The graph above shows the attrition rate of both minorities and non-minorities within each respective fiscal year from FY2011 to FY2013 YTD.

(b)(5)

- FY2013 data is through 8/1/2013

Attrition and Retention

Attrition by Gender

FY2011-FY2013 YTD Attrition Rate by Gender

FY2011
- Female: 2.8% (9)
- Male: 2.21% (8)

FY2012
- Female: 6.76% (58)
- Male: 7.73% (71)

FY2013 YTD
- Female: 7.68% (47)
- Male: 6.16% (42)

■ Female ■ Male

Overall Findings

(b)(5)

- FY2013 data is through 8/1/2013

30

Attrition and Retention
Findings
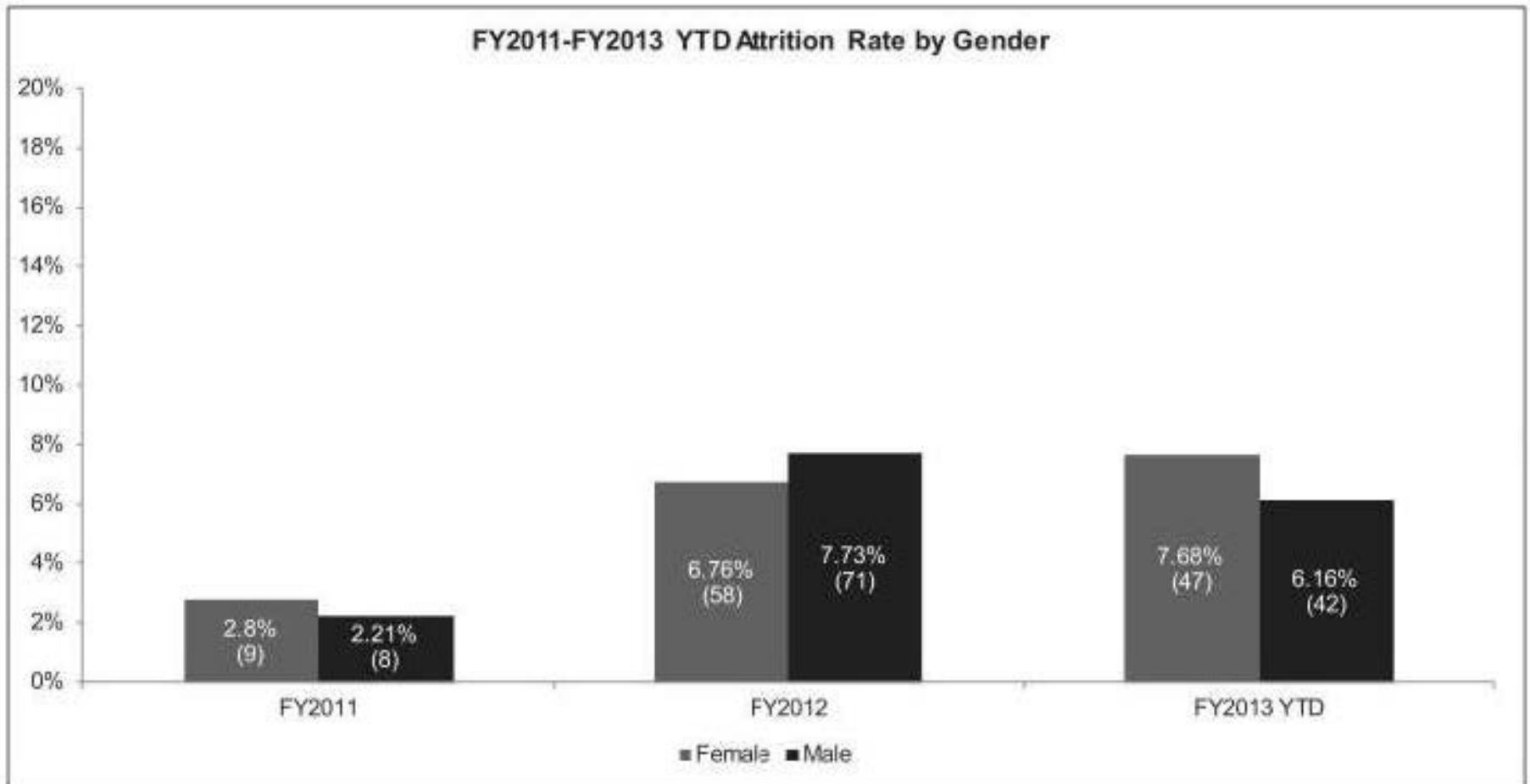
Overall Findings

(b)(5)

Attrition and Retention
Recommendations

Overall Recommendations

(b)(5)

Performance Management
FY2012 Performance Ratings by Ethnicity
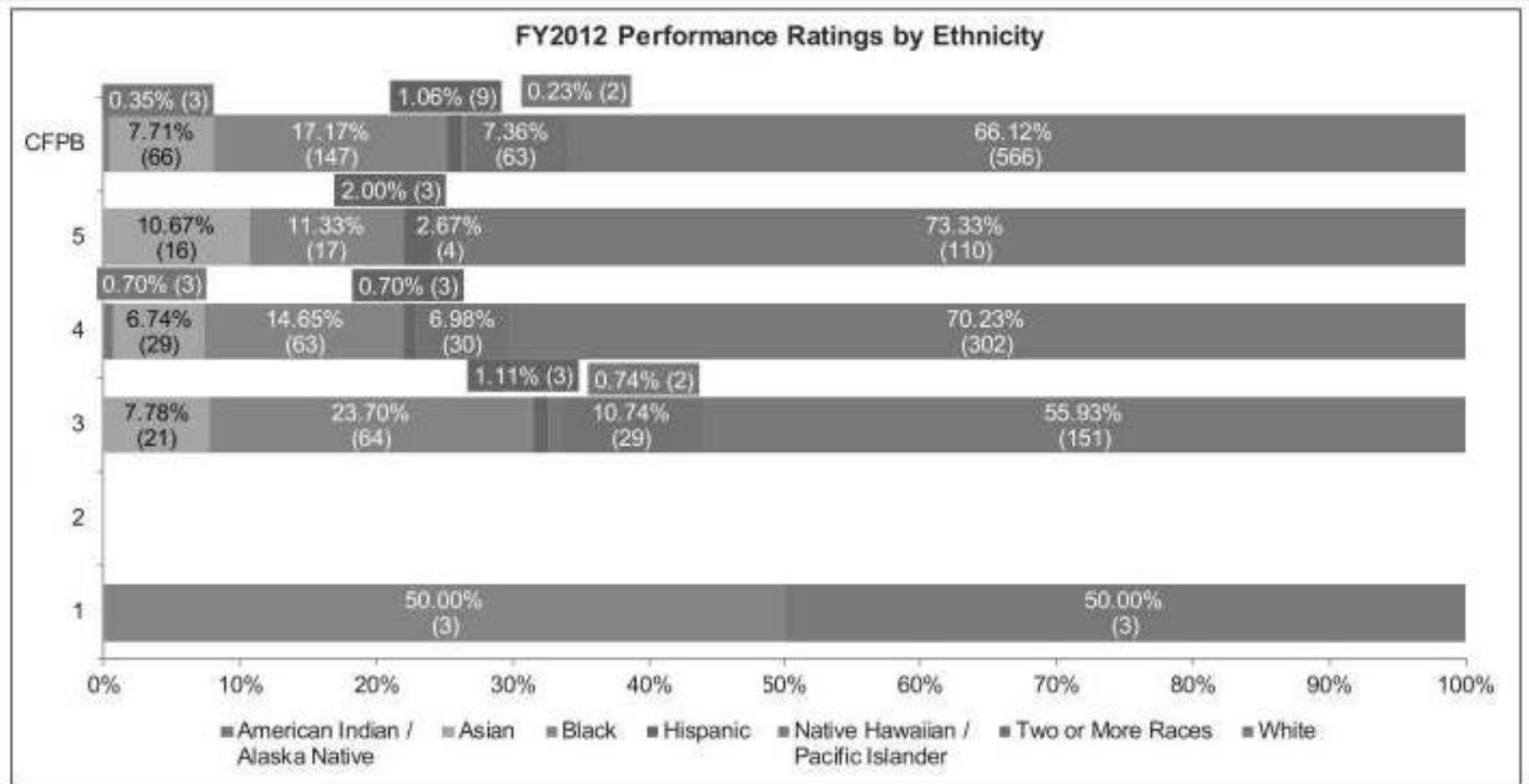
FY2012 Performance Ratings by Ethnicity

Legend: American Indian / Alaska Native · Asian · Black · Hispanic · Native Hawaiian / Pacific Islander · Two or More Races · White

CFPB: 0.35% (3); 7.71% (66); 17.17% (147); 1.06% (9); 7.36% (63); 0.23% (2); 66.12% (566)

5: 2.00% (3); 10.67% (16); 11.33% (17); 2.67% (4); 73.33% (110)

4: 0.70% (3); 6.74% (29); 14.65% (63); 0.70% (3); 6.98% (30); 70.23% (302)

3: 7.78% (21); 23.70% (64); 1.11% (3); 10.74% (29); 0.74% (2); 55.93% (151)

2: (no data)

1: 50.00% (3); 50.00% (3)

Overall Findings

(b)(5)

Performance Management
FY2012 Performance Ratings Representation compared to Overall CFPB

FY2012 Performance Ratings Representation by Ethnicity compared to Overall Composition

	American Indian / Alaska Native	Asian	Black	Hispanic	Native Hawaiian / Pacific Islander	Two or More Races	White
5	(b)(5)						
4							
3							
2							
1							

Legend	Positive	Neutral	Negative
	⬆	➡	⬇

Overall Findings

(b)(5)

Performance Management
FY2012 Performance Ratings by Gender

FY2012 Performance Ratings by Gender

Legend: ■ Female ■ Male

Overall Findings

(b)(5)

Performance Management
FY2012 Performance Ratings Representation compared to Overall CFPB

FY2012 Performance Ratings Representation by Ethnicity compared to Overall Composition

	1	2	3	4	5

	(b)(5)
Female	
Male	

Legend	Positive	Neutral	Negative
	⬆	➡	⬇

Overall Findings

(b)(5)

Performance Management
Findings

Overall Findings

(b)(5)

Performance Management
Recommendations

Overall Recommendations

(b)(5)

OPM Inclusion Index
CFPB Results

**OPM Inclusion
Index Dimensions**

**CFPB Inclusion
Index Dimensions**

(b)(5)

Fair

Empowered

Open

Inclusion
Index

Supportive

Cooperative

The OPM Inclusion Index is a combination of 20
questions from the Federal Employee
Viewpoint survey. The questions are separated
into 5 distinct inclusion dimensions.
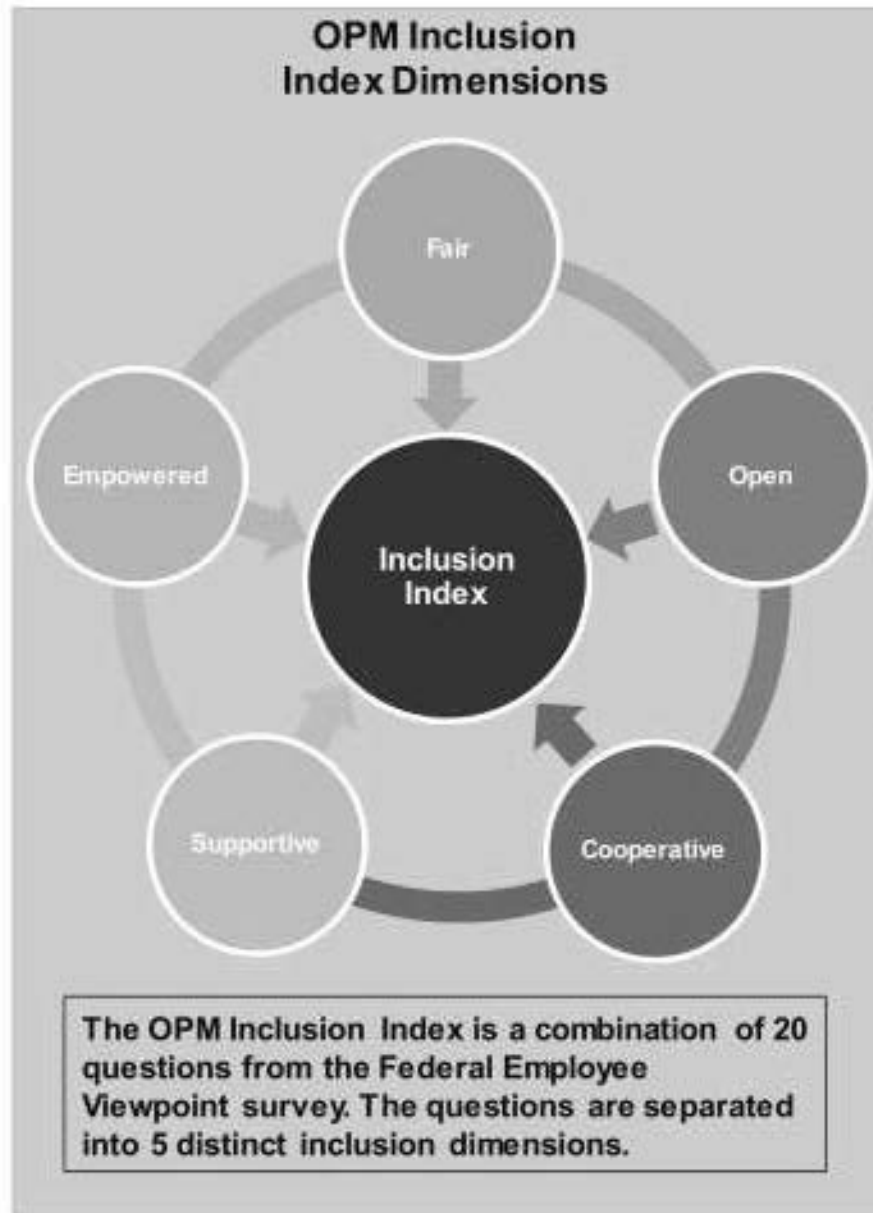
*FY2013 AES Survey included all 20 D&I questions.
**Scale of Inclusion Index score is based on the range from 0 to 10.

CFPB Inclusion Index
Overall CFPB Division Scores

Diversity and Inclusion Score by Division

8.2

7.9

7.4

7.2

7.1

6.7

6.9

Avg. 7.3

Cons. Ed.   EA   Gen. Couns.   Dir. Office   OPS   RMR   Supv.
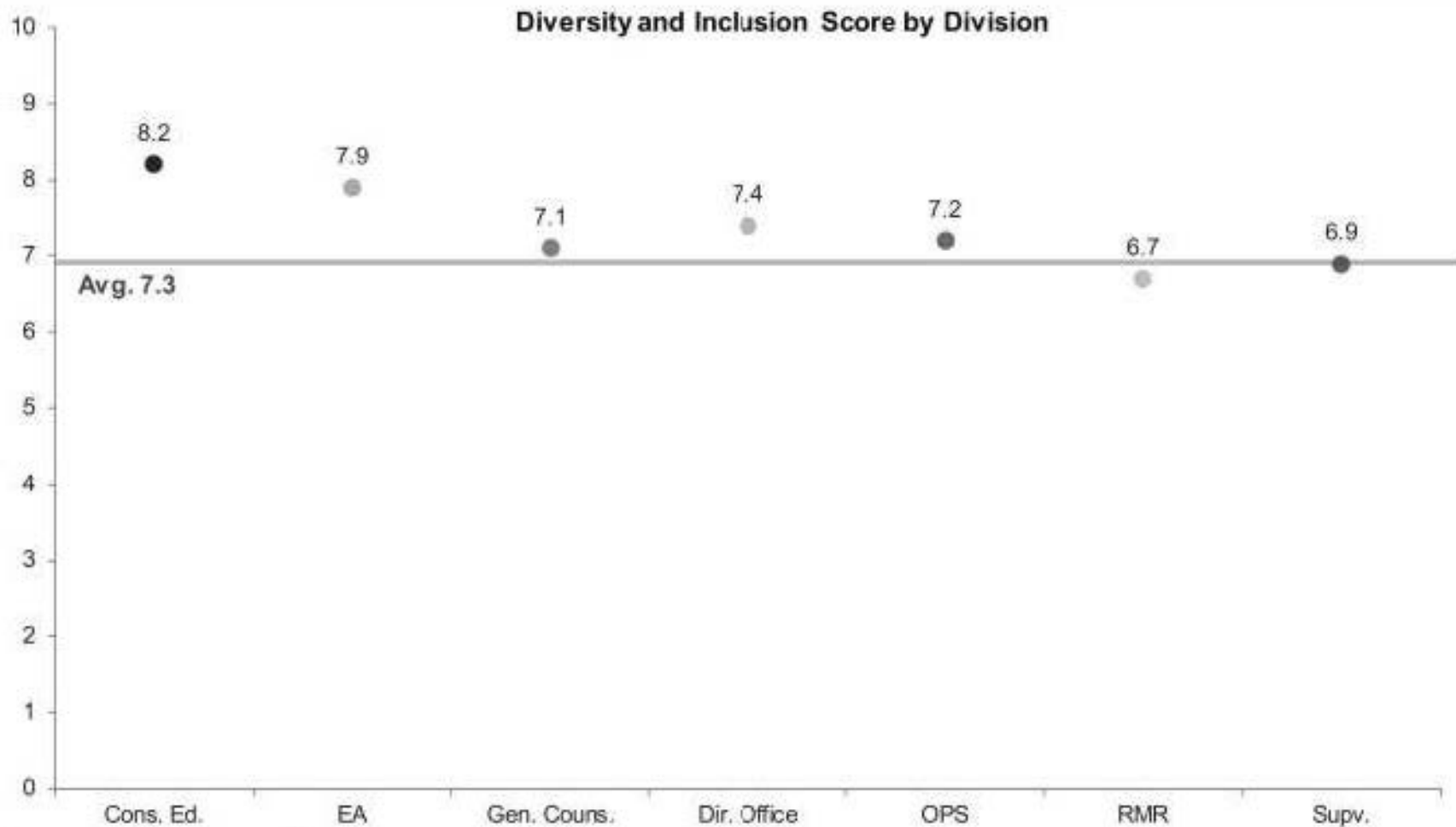
Overall Findings

- This graph maps the results from the 7 of the 20 inclusion index questions the CFPB workforce responded to by Division and shows where each division falls relative to the Bureau's average.

(b)(5)

CFPB Inclusion Index
Breakdown of Dimension Scores by Division

Fair Dimension Score by Division

- Cons. Ed.: 7.4
- EA: 6.9
- Gen. Couns.: 5.8
- Dir. Office: 6.8
- OPS: 5.8
- RMR: 5.3
- Supv.: 6.2
- Avg. 6.3

Open Dimension Score by Division

- Cons. Ed.: 8.4
- EA: 8.3
- Gen. Couns.: 7.6
- Dir. Office: 7.5
- OPS: 7.4
- RMR: 7.2
- Supv.: 6.9
- Avg. 7.6

Supportive Dimension Score by Division

- Cons. Ed.: 8.8
- EA: 8
- Gen. Couns.: 8.3
- Dir. Office: 7.8
- OPS: 8.3
- RMR: 7.6
- Supv.: 7.6
- Avg. 8.1

Empowered Dimension Score by Division

- Cons. Ed.: 8.1
- EA: 8.4
- Gen. Couns.: 6.7
- Dir. Office: 7.4
- OPS: 7.1
- RMR: 6.8
- Supv.: 6.8
- Avg. 7.3

Overall Findings

- These graphs show the Division scores across the 4 out of the 5 D&I dimensions measured by the survey.

(b)(5)

CFPB Inclusion Index
Findings

(b)(5)

CFPB Inclusion Index

Recommendations

(b)(5)

CFPB Leadership

CFPB Leadership

Leadership Perspective on Diversity and Inclusion

- The following word cloud highlights the words used by the leaders interviewed to describe what diversity and inclusion means to them personally.
- Leadership primarily focused on the cognitive aspects of diversity and inclusion.

CFPB Workforce

Workforce Perspective on Diversity and Inclusion

- The following word cloud highlights the words used by focus group participants to describe what diversity and inclusion means to them.
- The respondents primarily focused on the physical aspects of diversity and inclusion.

workforce composition private-sector racial ethnicity experiences opinions respect environment mission diversity religion opportunities education federal gender national-origin variety people age inclusive culture policies demographics value talent

Leadership Awareness
Findings

(b)(5)

Leadership Awareness
Recommendations

Overall Recommendations

(b)(5)

Leadership Support
Findings

(b)(5)

(b)(5)

Leadership Support
Recommendations

Overall Recommendations

(b)(5)

Leadership Learning and Development
Findings

Overall Findings

(b)(5)

(b)(5)

Leadership Learning and Development
Recommendations

Overall Recommendations

(b)(5)

OMWI Organization

OMWI Communications and Awareness
Findings

Overall Findings

(b)(5)

External Communications

- Thus far, OMWI has delivered one Annual Report to Congress in 2012.

(b)(5)

(b)(5)

OMWI Communications and Awareness
Recommendations

Overall Recommendations

(b)(5)

OMWI Organizational Capability and Capacity
Current Organization Structure and Functional Areas

Current Functional Areas:

(b)(5)

CFPB D&I Advisory Support

CFPB D&I Analytics and Reporting

CFPB D&I Communications

(b)(5)

Stuart Ishimaru,
OMWI Director

TBD
Senior Program Analyst

Rhonda Johnson
Senior Diversity and Inclusion Program Analyst

Mena Banh
D&I Procurement Analyst

Amber Haggins
D&I Analyst

■	> 1 year
■	< 6 months
▨	TBD

Overall Findings

(b)(5)

* OMWI's ability to mature functional areas required to achieve their mission is dependent upon additional resources

OMWI Organizational Capability and Capacity
Findings

Overall Findings

(b)(5)

OMWI Organizational Capability and Capacity

Recommendations

Overall Recommendations

(b)(5)

OMWI Organizational Capability and Capacity
Recommendations

(b)(5)

OMWI Organizational Capability and Capacity
Recommended Future Organization Structure and Functions

Future Functional Areas:

(b)(5)

CFPB D&I Advisory Support

CFPB D&I Analytics and Reporting

CFPB D&I Communications

Supplier Diversity

Regulated Entities

(b)(5)

Stuart Ishimaru,
OMWI Director

TBD
Diversity (Reg Entities)
Senior Program Analyst

Rhonda Johnson
Senior Diversity and Inclusion
Program Analyst

Mena Banh
D&I Procurement Analyst

TBD
Inclusion Analyst

Amber Haggins
D&I Analyst

TBD
D&I Specialist

TBD
D&I Specialist

TBD
Inclusion Analyst

TBD
Communications
Specialist

	> 1 year
	< 6 months
	TBD
	New Position

Overall Recommendations (continued)

(b)(5)

* OMWI's ability to mature functional areas required to achieve their mission is dependent upon additional resources

D&I Data Analytics, Reporting, and Technology
Findings

Overall Findings

(b)(5)

D&I Data Analytics, Reporting, and Technology
Findings

Overall Findings (continued)

(b)(5)

D&I Data Analytics, Reporting, and Technology

Recommendations

Overall Recommendations

(b)(5)

D&I Data analytics, Reporting, and Technology
Recommendations
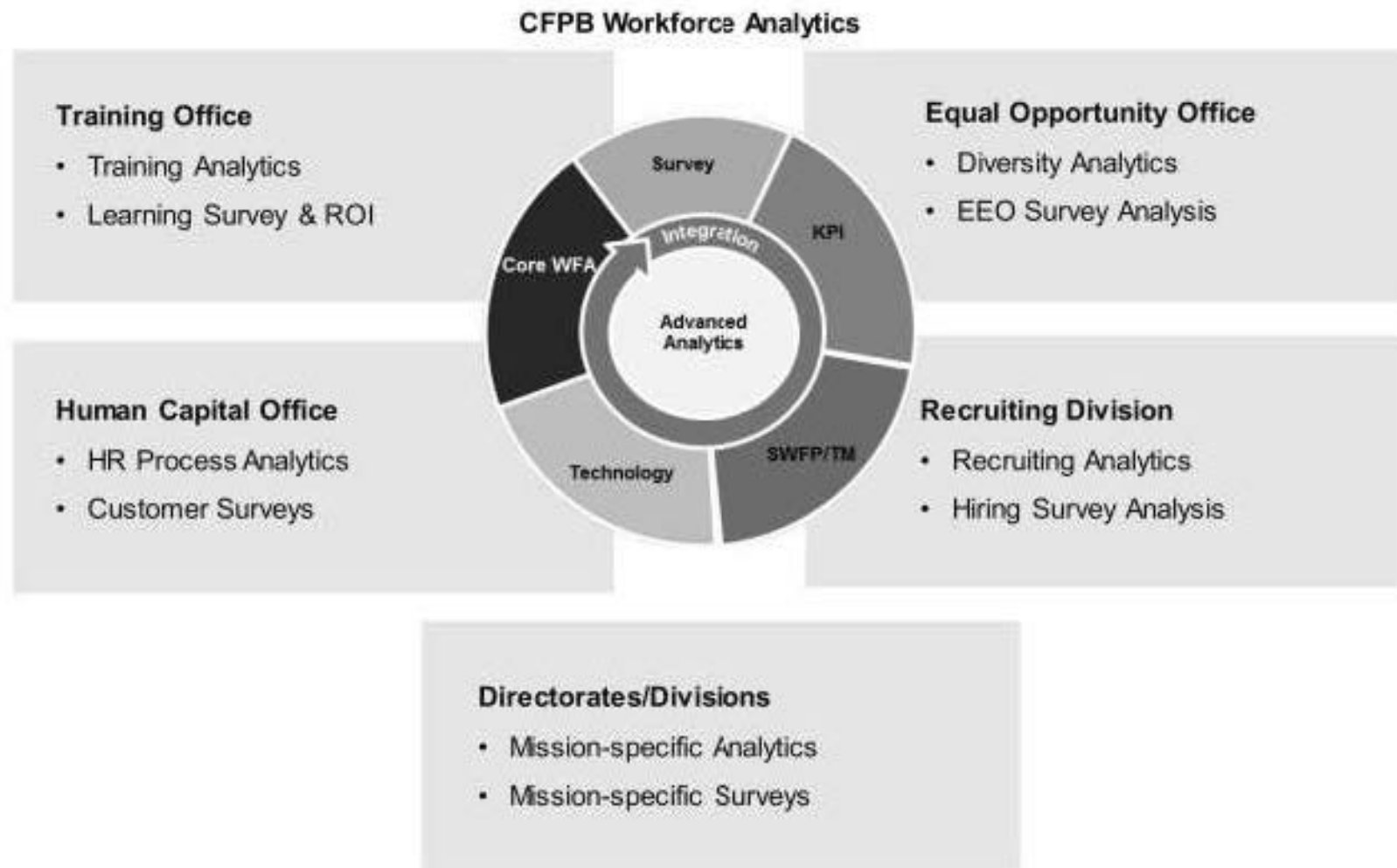
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D&I Data Analytics, Reporting, and Technology
Recommended CONOPS

The hub and spoke model leverages shared efficiencies with local support:.

- OMWI Workforce Analytics team could provide Bureau-wide, full spectrum of D&I analytics.
- Deloitte team supporting topic and mission specific analysis and reporting.

CFPB Workforce Analytics

Training Office
- Training Analytics
- Learning Survey & ROI

Equal Opportunity Office
- Diversity Analytics
- EEO Survey Analysis

Human Capital Office
- HR Process Analytics
- Customer Surveys

Recruiting Division
- Recruiting Analytics
- Hiring Survey Analysis

Directorates/Divisions
- Mission-specific Analytics
- Mission-specific Surveys

Learning and Development Opportunities
Findings

Overall Findings

(b)(5)

Learning and Development Opportunities
Recommendations

Overall Recommendations

(b)(5)

Learning and Development Opportunities

Recommendations

Overall Recommendations (continued)

(b)(5)

D&I Governance and Structure

Findings

Overall Findings

(b)(5)

D&I Governance and Structure
Recommendations

Overall Recommendations

(b)(5)

D&I Governance and Structure

Recommendations

Overall Recommendations (continued)
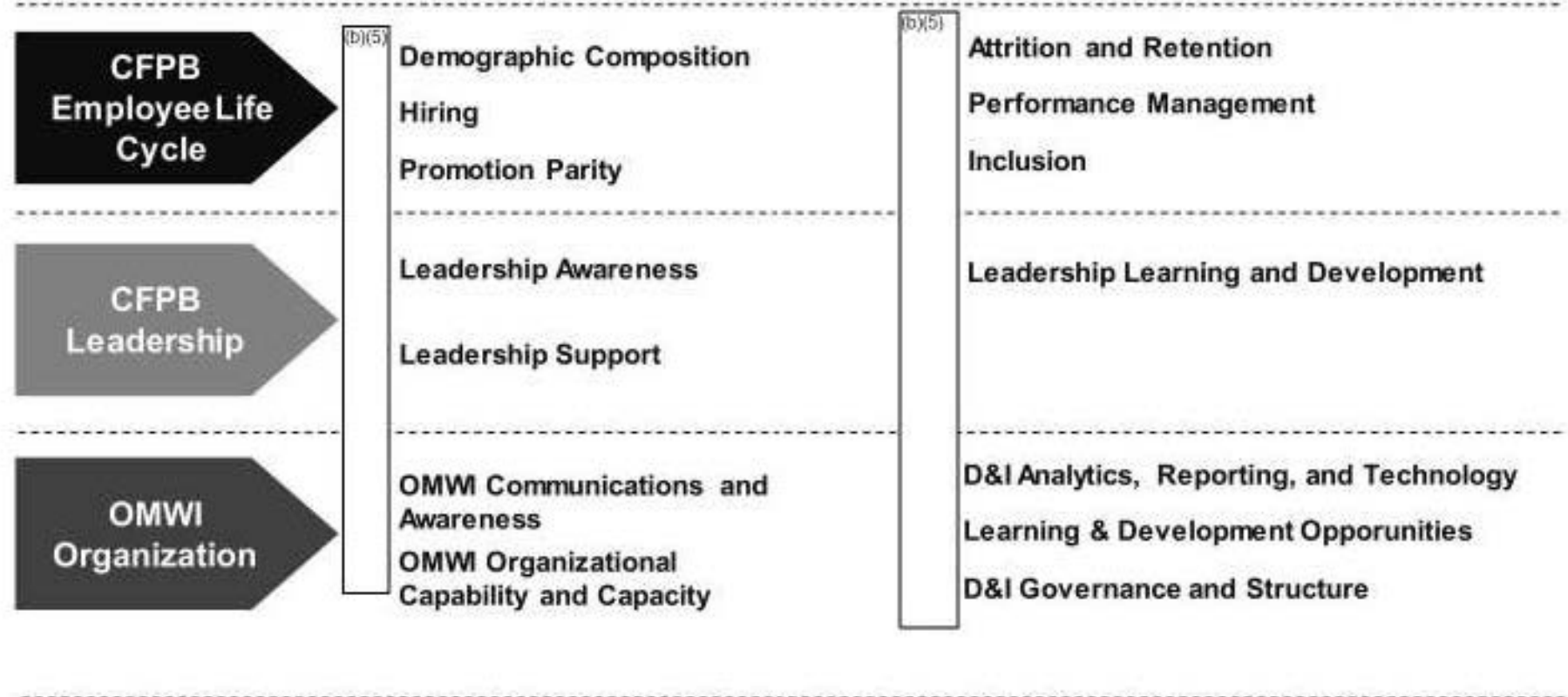
(b)(5)

Conclusion

Report Structure
Categories of Analysis

Summary

- This report summarizes the quantitative and qualitative findings from the diversity and inclusion audit performed by Deloitte between June 3, 2013 and August 30, 2013.
- The next steps are to identify and prioritize short term, mid-term, and long term operational plans that include owners and measures of success for OMWI.

CFPB Employee Life Cycle

(b)(5)

Demographic Composition

Hiring

Promotion Parity

(b)(5)

Attrition and Retention

Performance Management

Inclusion

CFPB Leadership

Leadership Awareness

Leadership Support

Leadership Learning and Development

OMWI Organization

OMWI Communications and Awareness

OMWI Organizational Capability and Capacity

D&I Analytics, Reporting, and Technology

Learning & Development Opporunities

D&I Governance and Structure

Appendix

Summary of Recommendations
D&I Assessment

Demographic Composition

(b)(5)

Hiring

(b)(5)

Summary of Recommendations
D&I Assessment

Hiring (continued)

(b)(5)

Summary of Recommendations
D&I Assessment

Promotions Parity

(b)(5)

Summary of Recommendations
D&I Assessment

Attrition and Retention

(b)(5)

Summary of Recommendations
D&I Assessment

Performance Management

(b)(5)

Summary of Recommendations
D&I Assessment

Inclusion Index

(b)(5)

Summary of Recommendations
D&I Assessment

Leadership Awareness

(b)(5)

Leadership Support

(b)(5)

Summary of Recommendations
D&I Assessment

Leadership Learning and Development

(b)(5)

OMWI Communications and Awareness

(b)(5)

Summary of Recommendations
D&I Assessment

OMWI Organizational Capability and Capacity (continued)

(b)(5)

Summary of Recommendations
D&I Assessment

OMWI Communications and Awareness (continued)

(b)(5)

Summary of Recommendations
D&I Assessment

OMWI Organizational Capability and Capacity

(b)(5)

Summary of Recommendations
D&I Assessment

D&I Data Analytics, Reporting, and Technology

(b)(5)

Summary of Recommendations
D&I Assessment

D&I Data Analytics, Reporting, and Technology (continued)

(b)(5)

Learning and Development Opportunities

(b)(5)

Summary of Recommendations
D&I Assessment

Learning and Development Opportunities (continued)

(b)(5)

D&I Governance and Structure

(b)(5)

Summary of Recommendations
D&I Assessment

D&I Governance and Structure (continued)

(b)(5)

Summary of Data Limitations

D&I Assessment

Demographic Composition

- The small N size of gender populations within each pay group limited the application of tests of statistical significance. Notwithstanding, the pay/gender frequency distributions do reveal a difference that should be monitored over time.
- Derivation of current CFPB Workforce
  - The Deloitte team intended to analyze total hires by ethnicity for FY2011 to FY2013 YTD, total attrition by ethnicity for FY2011 to 2013 YTD, and current workforce by ethnicity.
  - The goal was to illustrate whether CFPB is net +/- for each ethnicity category YTD.
  - The analysis was hampered by the following data challenges:
    - ***Reconciliation between aggregate hiring by ethnicity and aggregate attrition data by ethnicity across the three years did not match the current workforce population.*** The Deloitte team recognized that the aggregate hiring by ethnicity data for the past three years minus the aggregate attrition by ethnicity data for the past three years should equal the current workforce population but this was not the case.
      - ***Hispanics that identify with a secondary ethnicity are coded differently across the three years.*** From FY2011 to FY2012, Hispanics that identified with multiple ethnicities were coded to Two or More Races. However, in FY2013, Hispanics that identified with multiple ethnicities were coded to Hispanic – "Insert Ethnicity." Consulted with OMWI and they confirmed that this change occurred in FY2013.
      - ***Employees that did not self-report ethnicity during the hiring process were defaulted to "White" within the data system.*** In consultation with OMW and HC, we discovered that employees did not have to self-report their ethnicity and as a result, were given a "White" ethnicity designation within the data system. The Deloitte team spoke to HC employees to determine when this process started and ended but were unable to verify the actual dates.

Hiring

- Demographic analysis did not consider fill rates. As a result, a fill rate analysis could not be performed due to unavailable data how billets were issued (authorized positions versus assigned positions). This may be considered for future analysis as fill rates can be a leading indicator for inclusion challenges.

Promotions Parity

- ***Lack of clarity about the Bureau of Public Debt ("BPD") promotion data fields.*** A BPD data dictionary was not available to the Deloitte D&I assessment team so our data analysis was limited.

Summary of Data Limitations
D&I Assessment

Overall Data Limitations

- A BPD technical representative informed the Deloitte team that a data dictionary does not exist and it is currently in development. Efforts to engage other CFPB offices (OMWI, HC) about a data dictionary returned the same sentiments that the BPD technical representative shared with us.
- *No shared viewpoint on how a promotion is captured in BPD.* In consultation with OMWI and HC, we analyzed the BPD data fields in the promotion query extract. There is not an agreed upon definition of how promotions are captured in the BPD system.
- *Uncertainty about whether competitive and non-competitive promotions are captured by BPD.* Promotion analysis from the perspective of inclusion focuses primarily on competitive promotions and it is not clear how or if the competitive nature of a promotion is captured by the BPD system.

Leadership Awareness and Support
- Given the newness of the OMWI office, there is no quantitative information or findings related to the organizational capability and capacity. All of the findings above came from either the three focus groups conducted with the workforce and/or the 31 interviews conducted with leadership.

OMWI Organizational Capability and Capacity
- No prior organization assessment of OMWI had been conducted to date. All of the findings above are based on interviews conducted with leadership and focus groups with the workforce.

OMWI Communications and Awareness
- No prior communications assessment (e.g. stakeholder analysis) of OMWI had been conducted to date.

Learning and Development Opportunities
- Given the newness of the OMWI office there is no quantitative information or findings related to learning and development. All of the findings above came from either the 3 focus groups conducted with the workforce and/or the 31 interviews conducted with leadership.

D&I Governance and Structure

No prior organization assessment of OMWI or review of the organization structures/governance has been conducted. All of the findings above are based on interviews conducted with leadership and focus groups with the workforce.

Deloitte.