

National Government Ethics Summit 2014

**Timeline of Ethics Program at
Consumer Financial Protection Bureau (CFPB)**
(9-12-14)

Date	Approx. # of Bureau Employees Onboard	Key Events
July 2010		<ul style="list-style-type: none"> • Dodd-Frank Act created the CFPB
July – December 2010	25 (all Treasury employees)	<ul style="list-style-type: none"> • CFPB ethics program was started under the Department of Treasury's DAEO and ethics office • November 2010 – CFPB Implementation Team hired 1st full-time ethics attorney • Ethics team conducted pre-employment ethics vetting on each candidate selected for an executive position, before final selection decision was made • All new employees received ethics training through Treasury's ethics office • Treasury ethics office conducted all post-employment ethics briefings
February – March 2011	100	<ul style="list-style-type: none"> • Bureau's HR office launched its own payroll system and began maintaining its own data re: Bureau employees; data included financial disclosure filer status • March 2011 – Ethics team hired 2nd full-time ethics attorney • March 2011 - Ethics team issued <i>Confidential Disclosure Report Interim Procedures</i> (how incoming employees would be processed for designation as OGE 450 filers; how reports would be reviewed)

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April - December 2011	750	<ul style="list-style-type: none"> • May 9, 2011 – Ethics team conducted its first live ethics training for new employees at New Employee Orientation (took over the task from the Treasury ethics office) • July 2011 – Ethics team completed market research on electronic financial disclosure filing systems and presented to decisionmakers a proposal to contract with one (FDOonline) • October 2011 – Bureau awarded a contract to FDOonline for approx. 560 filers • December 2011 – Ethics team conducted annual ethics training for all filers • Ethics team began developing supplemental ethics regulations for Bureau employees
January – March 2012		<ul style="list-style-type: none"> • January 1, 2012 – Ethics team launched FDOonline, for all New Entrant reports filed on or after January 1, and for annual reports for 2011 reporting period • January 4, 2012 – CFPB Director took Oath of Office after signing the Ethics Pledge • January 9, 2012 – Director designated a DAEO and Alternate DAEO for the CFPB • February 21, 2012 – Director issued first All-Hands Email expressing the importance of ethics to the Bureau • February 2012 – DAEO issued <i>CFPB Confidential Financial Disclosure Procedures</i> policy • March 2012 – Director, DAEO, ADAEO, and ethics team has a meeting with OGE Deputy Director • March 2012 – Ethics team initiated and held a meeting with its Office of Inspector General (OIG) to lay the foundation for a good working relationship • June 2012 – The Bureau issued a policy pledging cooperation with the OIG
April – June 2012		<ul style="list-style-type: none"> • April 27, 2012 – CFPB published an interim final rule for CFPB Ethics Regulations (supplemental standards of conduct) • June 27, 2012 – CFPB Ethics Regulations took effect

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September 2012	970	
October 2012 – March 2013	1170	<ul style="list-style-type: none"> • CY 2012 statistics re: financial disclosure report filers: <ul style="list-style-type: none"> ○ 623 OGE 450 Annual report filers ○ 38 OGE 278 Annual Report filers • December 2012 – Ethics office had trained close to 100% of its employees (not just filers) on the CFPB Ethics Regulations, at live, in-person training sessions • January 2013 – Ethics office submitted its first Annual Agency Ethics Program Questionnaire to OGE for 2012 • March 2013 - DAEO issued <i>CFPB Public Disclosure Procedures</i> policy (including requirement for pre-employment vetting for incoming candidates for executive positions) • March 2013 – DAEO issued <i>Ethics Program SOPs</i> concerning ethics training, ethics advice and counseling, recordkeeping, and other aspects of ethics program management • March 2013 – OGE initiated its first program review of CFPB’s ethics program
April - September 2013		<ul style="list-style-type: none"> • September 2013 – OGE issued its Ethics Program Review report for CFPB, identifying 10 Model Practices
October 2013 – March 2014	1360	<ul style="list-style-type: none"> • CY 2013 statistics re: financial disclosure report filers: <ul style="list-style-type: none"> ○ 906 OGE 450 Annual Report filers ○ 42 OGE 278 Annual Report filers • Ethics office staffing = DAEO, ADAEO, 3½ ethics attorneys, 1 financial disclosure report manager, 1 support staff (part-time), additional financial disclosure report reviewers during OGE 450 filing season