



STRATEGIC PLAN TO ADVANCE

DIVERSITY, EQUITY,
INCLUSION, AND
ACCESSIBILITY



2024-2026

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“One of my top priorities is advancing diversity, equity, inclusion, and accessibility (DEIA), because the Commission needs to adopt new strategies to develop a workforce that reflects the diversity of the people we serve. The CFTC is striving to cultivate an inclusive and welcoming culture, where all employees feel valued, safe, empowered, and respected.”

- Chairman Rostin Behnam

MESSAGE FROM THE CHIEF DIVERSITY OFFICER



CFTC Colleagues, it is my honor to serve as the CFTC’s first Chief Diversity Officer (CDO), and I am very pleased to present to you the CFTC’s first Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility (DEIA Plan). In June 2021, the White House issued Executive Order 14035: Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce (Executive Order or EO 14035), stating “the Federal Government must strengthen its ability to recruit, hire, develop, promote, and retain our Nation’s talent and remove barriers to equal opportunity. It must also provide resources and opportunities to strengthen and advance diversity, equity, inclusion, and accessibility (DEIA) across the Federal Government.” The Executive Order charged agencies with implementing agency specific DEIA Strategic Plans, consistent with the Government-wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce

(Government-wide Plan). The Government-wide Plan offers a roadmap for implementing the Executive Order and lays out key steps agencies can take to strengthen DEIA in their workforce policies, practices, and culture. Consistent with the Executive Order and those key steps, the CFTC’s DEIA Plan is designed to deliver measurable results and aligns with the CFTC mission, vision, values and overall CFTC 2022-2026 Strategic Plan.

Since stepping into the role of CDO in January 2022, I have had the pleasure of meeting many of you and value the opportunity to observe, listen, and learn about the CFTC culture and how it is perceived and experienced at all levels and across all parts of the CFTC. I appreciate your willingness to share your experiences and ideas to help inform a purposeful, defined DEIA vision and strategy. With Chairman Behnam, I am proud of the work that we began from day one to implement a DEIA vision and strategy that reflects his commitment to DEIA as a strategic priority critical to CFTC mission success.

Integration of DEIA principles into an organization is ongoing transformational, change management work that requires the collective will and dedication of everyone. Only together can we attract qualified, diverse top talent and create inclusive, welcoming environments where everyone can thrive as a highly functioning member of the CFTC team. This DEIA Plan would not have come to fruition without the sustained commitment, passion, ideas and engagement from our Union and Affinity Group leaders and the DEIA Plan Project Team (Project Team).

As we continue our DEIA journey together, please know that I will continue to serve as a consultant, advisor and strategic thought partner with you to realize our DEIA vision through an approach that addresses these fundamental questions for every CFTC employee: Do you see me? Do you hear me? Do I matter? I see you. I hear you. You matter. Together, we can build a culture that supports us all to bring our best and do our best.

Onward and Upward,

Tanisha Cole Edmonds
 Chief Diversity Officer and Director,
 Office of Minority and Women Inclusion

INTRODUCTION

The CFTC's first Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility (DEIA Plan) is the result of a collaborative effort by a core project team led by the Office of Minority and Women Inclusion (OMWI) and the Division of Administration, with liaisons from within the Office of the Chairman, each Commissioner's Office, the Office of General Counsel, the Office of the Chief Economist, the Office of International Affairs, and each programmatic division, specifically, the Division of Clearing and Risk, the Division of Data, the Division of Enforcement, the Division of Market Oversight, and the Market Participants Division. A whole-of-agency, collaborative approach was key to the development of this DEIA Plan in recognition of DEIA as a cross-functional priority that must leverage the efforts, capabilities, and resources of the whole agency. As a precursor to the development of this DEIA Plan, OMWI led a series of Voice your Vision sessions, culminating in an opportunity for the entire workforce to vote on a shared DEIA Vision Statement for the CFTC.

In developing this DEIA Plan, the Project Team engaged in a methodical evidence-based and data-driven approach with ongoing stakeholder engagement across the workforce. The process started with kick off briefings with the Chairman, each Commissioner, Division/Office Directors, and Union and Affinity Group leaders and ended with briefings with these same leaders to present and receive feedback on the DEIA Plan's draft goals, objectives and strategies. Over the course of 8 months, the Project Team met weekly to review the Government-wide Strategic Plan to Advance Diversity, Equity, Inclusion and Accessibility in the Federal Workforce (Government-wide Plan) and evaluate CFTC specific data against each priority area identified in the Government-wide Plan.¹ The Project Team reviewed over twenty documents, including research and reports on DEIA best practices and methodologies and DEIA strategic plans from other federal financial regulatory agencies and cabinet level executive agencies.²

The Project Team also reviewed data in the development of this DEIA Plan, including internal assessments and analyses, Affinity Group recommendations and surveys, the CFTC's Fiscal Year (FY) 2021 and FY 2022 total workforce demographic data, division specific data, grade distribution data, applicant flow data, and the 2022 Federal Employee Viewpoint Survey (FEVS) results.³ Additional data gathered and evaluated included presentations from agency subject matter experts and a series of focus groups with each of the CFTC's Affinity Groups, employees with the CFTC 15+ years, employees with the CFTC 1-3 years, hiring managers and supervisors, Human Resources Branch employees, and an open focus group for all CFTC employees. One-on-one interviews for Deputy Directors with the Chief Diversity Officer were also offered. The Project Team liaisons

¹ The White House. (2021). *Government-wide Strategic Plan to Advance Diversity, Equity, Inclusion and Accessibility in the Federal Workforce*. <https://www.whitehouse.gov/wp-content/uploads/2021/11/Strategic-Plan-to-Advance-Diversity-Equity-Inclusion-and-Accessibility-in-the-Federal-Workforce-11.23.21.pdf>

² Federal Agencies whose DEIA Plans were reviewed: [U.S. Department of the Treasury](#), [U.S. Department of Homeland Security](#), [U.S. Department of the Interior](#), [U.S. Securities and Exchange Commission](#), [Consumer Financial Protection Bureau](#), [Federal Deposit Insurance Corporation](#), and [National Credit Union Administration](#).

³ The United States Office of Personnel Management (OPM). *OPM FEVS Dashboard*. <https://www.opm.gov/fevs/reports/opm-fevs-dashboard/>. The CFTC's 2022 FEVS DEIA Index results and FY 2021 and FY 2022 total workforce demographic data were the most recent data available during the development of this DEIA Plan. Full-time and part-time permanent, nonseasonal federal employees who were onboard on or before November of the prior year are eligible to participate in the FEVS.

reviewed possible plan elements with their Divisions/Offices and recommended CFTC-wide and Division/Office specific goals and strategies/actions to support the DEIA Plan based on the data gathered and evaluated.

This DEIA Plan, aligned to the CFTC's 2022-2026 Strategic Plan, focuses on six goals, including objectives and strategies/actions to support the achievement of each goal, and identifies the lead office(s) for implementation of each goal.⁴ The CFTC is committed to implementing this DEIA Plan with intention, enthusiasm and optimism, recognizing that the ultimate success of this DEIA Plan is dependent on buy-in and commitment from executives, supervisors, managers and employees across the CFTC.⁵

⁴ U.S. Commodity Futures Trading Commission. (2022). *Commodity Futures Trading Commission 2022-2026 Strategic Plan*. <https://www.cftc.gov/About/CFTCReports/index.htm>.

⁵ The DEIA Plan is to be read consistent with the terms and conditions found in the Collective Bargaining Agreement between the National Treasury Employees Union and the CFTC (originally executed on June 10, 2019); all CFTC administrative policies and procedures; and applicable law and regulation. Any greater than de minimis changes to bargaining unit employee conditions of employment stemming from initiatives under the DEIA Plan are subject to notice and bargaining requirements. Divisions/Offices may not create policies or procedures that conflict with Agency-wide policies and procedures. The DEIA Plan does not create any rights inconsistent with law or regulation, and its implementation and continued application are subject to Agency appropriations and Commission priorities (except as required by applicable law or regulation).

DEIA VISION STATEMENT

The CFTC embraces diversity as a strength and understands that transparency, fairness, and equity must guide decision-making. Everyone is accountable for contributing to a respectful, safe, inclusive, accessible, and collaborative workplace culture so that opportunities and means to excel are available to all.⁶

FOUNDATIONAL PRINCIPLES

Maintain an evidence-based and data-driven approach to DEIA – We will shine light on areas of opportunity where we can take ownership and action by utilizing all available information and data to glean actionable insights.

Continue to learn and grow – We will celebrate what we do well, and what we have done, while looking for opportunities for positive change. We will grow individually and together on our DEIA journey by embracing a growth mindset through acknowledging and celebrating not only accomplishment of goals or objectives, but learning and progress. We will continually engage in review and iteration of our strategies and activities so that we are embracing the idea of continuous improvement on our DEIA journey.

Prioritize accountability and transparency – We recognize that DEIA is a shared responsibility and that collectively and individually, we are partners in accountability. We seek to raise each other up to create the work experience we all deserve and use a measured and transparent approach to illustrate our efforts and our progress to the workforce based on our goals.

Collaborate and innovate – We will look for opportunities to arrive at meaningful DEIA solutions through collaboration and innovation. We recognize that collaboration and innovation can mean rethinking how we do business, working across traditional silos, challenging long held assumptions and processes, and demonstrating a willingness to try new approaches.

Seek to understand the perspectives of the workforce – We understand employee experiences and perspectives across the employment lifecycle can vary based on a number of factors, including background, division, office, regional office, and tenure at the CFTC. We will continue to listen and will look for new ways to listen and learn.

⁶ All CFTC employees were given the opportunity to anonymously vote for the DEIA Vision Statement.

SUMMARY OF GOALS

Goal 1. INCLUSIVE WORKPLACES

Develop policies, processes, tools and resources, and training to promote and sustain a welcoming, inclusive, and equitable culture at the CFTC.

Goal 2. PARTNERSHIPS AND RECRUITMENT

Implement structured and equitable hiring processes that mitigate bias, develop inclusive outreach and recruitment practices, and establish partnerships that maximize the CFTC's ability to attract diverse pools of qualified applicants.

Goal 3. PAID INTERNSHIPS

Expand paid internship and fellowship opportunities to support the development of a diverse talent pipeline.

Goal 4. PROFESSIONAL DEVELOPMENT AND ADVANCEMENT

Advance equity and transparency for all employees, including employees from underserved communities, regarding professional development opportunities including training, mentoring, promotions, speaking opportunities and conferences, work assignments, details, and professional development programs.

Goal 5. DATA

Develop and maintain a data-driven and evidence-based approach to DEIA that informs decision-making and policy development.

Goal 6. EQUITY IN PROCUREMENT AND CUSTOMER EDUCATION AND OUTREACH

Develop and implement policies, procedures, and practices to advance equity for underserved communities in procurement and customer education and outreach.

These goals align with Objectives 2.5, 5.1, and 5.2 as described in the CFTC's 2022-2026 Strategic Plan:

Strategic Objective 2.5

Employ sophisticated, inclusive, and accessible multimedia strategies to approach customers and potential customers, particularly in historically underserved communities, to educate them about derivatives markets, managing risk, and avoiding fraud.

Strategic Objective 5.1

Embrace and embed equal opportunity and diversity, equity, inclusion, and accessibility (DEIA) principles and best practices into all Commission operations.

Strategic Objective 5.2

Improve agency-wide strategic approach to human capital management to better attract, develop, retain, and promote a diverse workforce whose expertise will serve as a hallmark in the derivatives industry.

DIVERSITY, EQUITY, INCLUSION, AND ACCESSIBILITY GOALS

Goal 1. INCLUSIVE WORKPLACES: Develop policies, processes, tools and resources, and training to promote and sustain a welcoming, inclusive, and equitable culture at the CFTC.

Objective 1.1 Cultivate a CFTC culture that embodies our DEIA vision anchored in the expectation that we all experience a sense of belonging; treat each other with civility, dignity, and respect; and value each other's unique perspectives, skills, and experience.

| STRATEGY/ACTION | | | LEAD OFFICE |
|-----------------|--|---|--------------------------|
| 1.1.1 | Diversity, Equity, Inclusion and Accessibility (DEIA) Training and Education | <ul style="list-style-type: none"> • Make visible and accessible DEIA-related on-demand classroom and online-based training resources on the Commission Learning Academy site. • Establish and offer DEIA curriculum/course tracks for managers, supervisors and employees on the Commission Learning Academy site. • Build agency-wide DEIA competencies, skills, and awareness through messaging, development of toolkits, and opportunities for dialogue and education through agency-wide and small group discussions, speaker-led talks, and education series. • Develop a leadership toolkit and offer annual training for executives, managers, and supervisors on leading diverse teams and maintaining inclusive and welcoming environments. | OMWI, DA |
| 1.1.2 | DEIA Awards and Recognition | <ul style="list-style-type: none"> • Establish a standalone DEIA award to recognize and honor outstanding contributions made by individuals or teams as part of the annual Honorary Awards Ceremony. | OMWI, Chair's Office, DA |
| 1.1.3 | Affinity Groups | <ul style="list-style-type: none"> • Engage Affinity Groups in promoting inclusive workplaces through access to senior leaders to provide perspectives, observations, and recommendations to better understand the needs of the agency's workforce. • Provide Affinity Group leaders information on Employee Resource and Affinity Group training opportunities, organizations, and communities of practice. • Encourage executive participation in Affinity Groups. | OMWI, DA |
| 1.1.4 | Equal Employment Opportunity, Reasonable Accommodations, Whistleblower | <ul style="list-style-type: none"> • Evaluate and implement barrier analysis efforts in accordance with the Equal Employment Opportunity Commission's (EEOC) management directives and guidance to identify root causes and establish action plans to address policies, procedures, and practices that lead to disparities in equal employment opportunity where found.⁷ • Provide regular training to the workforce on EEO rights, responsibilities and processes, anti-harassment, religious and | OMWI, DA |

⁷ U.S. Equal Employment Opportunity Commission. *Regulations, Directives, Guidance and Resource Documents: Management Directives*. <https://www.eeoc.gov/federal-sector/management-directive/regulations-directives-guidance-and-resource-documents>.

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| | and Retaliation Protections | <p>reasonable accommodations, and whistleblower and anti-retaliation protections.</p> <ul style="list-style-type: none"> • Develop and issue policies and procedures on providing reasonable accommodations to individuals with disabilities, including known limitations related to pregnancy, childbirth or related medical conditions, in accordance with applicable law and regulations. • Develop and issue policies and procedures on providing religious accommodations, in accordance with applicable law and regulations. | |
| 1.1.5 | Conflict Resolution | <ul style="list-style-type: none"> • Evaluate the feasibility of implementing an Ombuds program to support resolution of workplace conflicts. • Raise awareness of and enhance existing CFTC programs for early resolution of workplace conflicts. | OMWI, DA |

Objective 1.2 Design, construct, develop and maintain facilities, technology, programs, and services so that all individuals, including individuals with disabilities, can fully and independently use them.

| STRATEGY/ACTION | | LEAD OFFICE | |
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| 1.2.1 | Technology | <ul style="list-style-type: none"> • Provide training, tools, and resources to all employees on creating accessible documents and virtual environments. • Evaluate the feasibility of increasing resources to support the full implementation of a Section 508 Program, including designating a Section 508 Program Manager in accordance with Section 508 (Federal Electronic and Information Technology) of the Rehabilitation Act of 1973, as amended.⁸ • Review CFTC Section 508 policy and procedures and update, as necessary, to maintain compliance with federal law and regulations governing information and communication technology accessibility. • Establish a schedule for review and assessment of IT applications against benchmarks and industry standards to support equitable access. | OMWI, DA |

⁸ General Services Administration. *Section508.gov: Buy. Build. Be Accessible.* <https://www.section508.gov/>. Section 508, The Rehabilitation Act of 1973, as amended, [29 U.S.C. §794d](https://www.govinfo.gov/content/pkg/USCODE-2011-title29/html/USCODE-2011-title29-chap16-subchapV-sec794d.htm). <https://www.govinfo.gov/content/pkg/USCODE-2011-title29/html/USCODE-2011-title29-chap16-subchapV-sec794d.htm>. The foundational law for Information and Communication Technology (ICT) accessibility, Section 508 of the Rehabilitation Act of 1973, as amended, mandates that federal agencies make their ICT accessible to persons with disabilities (PWD). Under this statute, federal agencies must ensure the ICT they develop, procure, maintain, and use is accessible to PWD, including disabled federal employees and members of the public.

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| 1.2.2 | Facilities | <ul style="list-style-type: none"> • Provide training, tools, and resources to all employees on processes to make physical environments, including common and individual work and meeting spaces accessible. • Review CFTC facility policy and procedures and update, as necessary, to ensure compliance with federal laws, regulations, and standards governing accessible facilities. • Establish a schedule for review and assessment of facilities to maintain accessible facilities for all individuals, including individuals with disabilities, in compliance with federal laws, regulations, and standards governing accessible facilities. | DA |
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Objective 1.3 Demonstrate leadership accountability and commitment to advancing and supporting DEIA goals and objectives.

| STRATEGY/ACTION | | | LEAD OFFICE |
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| 1.3.1 | Commitment | <ul style="list-style-type: none"> • Disseminate the Chair’s annual statement on the CFTC’s commitment to EEO and Anti-Harassment to Division/Office staff. • Conduct annual agency-wide Townhall meeting on DEIA activities and progress, including Union and Affinity Group participation. Support staff attendance. • Develop and disseminate an annual report to the workforce on DEIA Plan activities and progress. • Support Division/Office Directors in discussing this DEIA Plan and their Division/Office specific DEIA strategies and progress at least annually at an all hands Division/Office meeting. • Encourage and model attendance at programs commemorating Special Observance and Heritage months. • Consult with OMWI Outreach and Engagement specialists in anticipation of filling vacancies for support in strategic outreach to attract diverse qualified candidates. | OMWI, Divisions/Offices |
| 1.3.2 | Accountability | <ul style="list-style-type: none"> • Establish and charter a DEIA Executive Council, comprised of senior CFTC leaders, with sub-workgroups, to oversee implementation of strategies and actions in this DEIA Plan. • Maintain communication and engagement with Commissioners’ offices regarding implementation of this DEIA Plan. • Schedule quarterly consultation meetings between OMWI and Division/Office leadership to discuss Division/Office specific DEIA accomplishments, challenges, and opportunities. • Establish DEIA/EEO performance standards for executives, managers, and supervisors. • Consult CDO or their designee on strategic plan development and on personnel matters pertaining to the recruitment and hiring process, | OMWI, Chair’s Office, Divisions/Offices |

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| | | workforce and succession planning, training, and mentoring/coaching and professional development programs. | |
| 1.3.3 | Transparency | <ul style="list-style-type: none"> Post and disseminate to senior leadership annual and quarterly reports submitted to Congress, the EEOC, and the Office of Personnel Management (OPM) on DEIA, recruitment, and hiring consistent with applicable law, guidance, and privacy considerations. | OMWI, Divisions/Offices, DA |

Objective 1.4 The Commission’s communications strategy elevates DEIA as a strategic priority critical to CFTC mission success.

| | | STRATEGY/ACTION | LEAD OFFICE |
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| 1.4.1 | Internal Communications | <ul style="list-style-type: none"> Develop an internal DEIA communications plan to provide resources, information and guidance to the workforce on actions being taken to achieve the goals outlined in this DEIA Plan. Maintain internal CFTC SharePoint site and web pages to provide the workforce easily locatable, accessible, and up-to-date information about career, internship, and professional development opportunities and resources, information, and guidance on DEIA. | OMWI, DA |
| 1.4.2 | External Communications | <ul style="list-style-type: none"> Identify opportunities to utilize multi-media resources to develop content that illustrates CFTC’s commitment to DEIA, improves CFTC’s brand awareness, and attracts diverse qualified candidates. Update and maintain CFTC’s public facing website to engage and inform the public about the CFTC’s mission, careers, culture, benefits, internships, and job opportunities and provide access to resources, information, and guidance on DEIA. | OMWI, OPA |

Goal 2. PARTNERSHIPS AND RECRUITMENT: Implement structured and equitable hiring processes that mitigate bias, develop inclusive outreach and recruitment practices, and establish partnerships that maximize the CFTC’s ability to attract diverse pools of qualified applicants.

Objective 2.1 Conduct outreach and recruitment activities to attract the CFTC’s future workforce and build the CFTC’s brand.

| STRATEGY/ACTION | | LEAD OFFICE |
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| 2.1.1 | <p>Outreach and Recruitment</p> <ul style="list-style-type: none"> Utilize hiring projections of CFTC hiring needs to develop and implement a Recruitment and Talent Sourcing Plan that includes outreach and recruitment activities for attracting diverse qualified candidates. Develop recruitment materials to utilize at outreach and recruitment events. Develop and maintain communication channels to stay engaged and connected with prospective job seekers regarding their interest in CFTC internship and job opportunities. Support Headquarters and Regional Divisions/Offices in their outreach and recruitment activities. | OMWI, DA, Divisions/ Offices |
| 2.1.2 | <p>Partnerships</p> <ul style="list-style-type: none"> Establish relationships with minority serving institutions, women’s colleges and universities, rural and land grant colleges and universities, professional and student associations, and other organizations to help develop and maintain a pipeline of diverse qualified candidates for employment in CFTC mission critical occupations. Establish partnerships with counterparts at other federal government agencies to maximize outreach and recruitment capabilities. Support participation of interested CFTC executives, managers, supervisors, and employees at outreach and recruitment events through development of guidance, training, and tools. | OMWI, Divisions/ Offices |

Objective 2.2 Implement hiring practices that are equitable, inclusive, and mitigate bias.

| STRATEGY/ACTION | | LEAD OFFICE |
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| 2.2.1 | <p>Training, Guidance and Resources</p> <ul style="list-style-type: none"> Provide hiring managers training, toolkits, and guidance on best practices and considerations for implementing an equitable hiring process and developing inclusive job opportunity announcements. Deliver training for hiring managers on adherence to merit system principles. Develop structured interview and resume review guidance and processes for evaluating candidates using consistent and objective criteria and processes for vacancies and detail opportunities, including guidance on diverse interview panels. | OMWI, DA |

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| | | <ul style="list-style-type: none"> • Raise awareness of provisions included in the Master Collective Bargaining Agreement between the National Treasury Employees Union (NTEU) Chapter 337 and the CFTC for requesting and providing post-selection feedback for internal candidates not selected for vacancies or promotions. | |
| 2.2.2 | Use of Hiring Authorities | <ul style="list-style-type: none"> • Evaluate and expand opportunities to leverage hiring authorities and programs to support hiring veterans, disabled veterans, and individuals with disabilities. • Develop toolkits and guidance for hiring managers on the use of special hiring authorities for individuals with disabilities and veterans. | DA |
| 2.2.3 | Hiring Process | <ul style="list-style-type: none"> • Review hiring policies and procedures periodically to identify and address potential barriers and improve equitable access and equal opportunity for jobs. • Include OMWI staff in orientation/onboarding for new employees, interns, and recent graduates to provide statements, guidance, policies, and other information on Affinity Groups and DEIA. • Continue to create hiring projections of Division/Office hiring needs and align OMWI's Strategic Recruitment and Talent Sourcing Plan with projected hiring needs and job postings to attract diverse qualified candidates. | OMWI, DA |

Goal 3. PAID INTERNSHIPS: Expand paid internship and fellowship opportunities to support the development of a diverse talent pipeline.

Objective 3.1 Seek opportunities to promote paid internship and fellowship opportunities.

| | | STRATEGY/ACTION | LEAD OFFICE |
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| 3.1.1 | Partnerships with Non-Profit and other Organizations | <ul style="list-style-type: none"> Establish relationships with non-profit and other organizations that seek to place students, including students from underserved communities, in paid internships. Explore the possibility of partnering with non-profit and other organizations to place students from underserved communities in paid internships at the CFTC, where feasible and consistent with applicable law. | OMWI, Chairman's Office, DA |
| 3.1.2 | Pathways Programs | <ul style="list-style-type: none"> Expand the use of the Pathways Internship, Recent Graduates, and Presidential Management Fellows Programs to maximize availability of paid opportunities and opportunities that can lead to conversion. Evaluate applicant flow and conversion data of all Pathways Programs at least annually and determine if programs are drawing from diverse pools of qualified applicants, including applicants from underserved communities. | DA, DOD |

Goal 4. PROFESSIONAL DEVELOPMENT AND ADVANCEMENT: Advance equity and transparency for all employees, including employees from underserved communities, regarding professional development opportunities including training, mentoring, promotions, speaking opportunities and conferences, work assignments, details, and professional development programs.

Objective 4.1 Expand awareness and availability of professional development opportunities.

| STRATEGY/ACTION | | | LEAD OFFICE |
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| 4.1.1 | Mentoring and Leadership Development | <ul style="list-style-type: none"> Develop new internal programs and provide information about external leadership development and mentoring programs for non-supervisory employees to help create a pipeline of promotion eligible candidates. Maintain, to the extent possible, a roster of qualified instructors, coaches, and mentors for leadership, coaching and mentoring programs. Incorporate DEIA modules into leadership development programs for non-supervisory employees. | DA |
| 4.1.2 | Professional Development for Executives, Managers, and Supervisors | <ul style="list-style-type: none"> Expand the availability of feedback mechanisms, including 360 assessments, and mentoring and coaching for executives, managers, and supervisors to support the development of a leadership corps who can effectively lead diverse teams and maintain inclusive and welcoming environments. Provide learning sessions and guidance for executives, managers, and supervisors on the effective use of Individual Development Plans to support employee professional development. | DA |
| 4.1.3 | Evaluation and Transparency | <ul style="list-style-type: none"> Announce to the workforce professional and leadership development opportunities, including details, and coaching and mentoring opportunities, including criteria for selection and participation. Make visible and accessible on the CFTC intranet. Evaluate participation data and feedback on all professional and leadership development, and coaching and mentoring programs. Address potential barriers to equal opportunity and access. | OMWI, Chair's Office, DOD, DA |

Goal 5. DATA: Develop and maintain a data-driven and evidence-based approach to DEIA that informs decision-making and policy development.

Objective 5.1 Improve the collection and analysis of qualitative and quantitative data to enable the CFTC to assess progress, evaluate root causes, and build evidence on key questions regarding DEIA initiatives and integrate insights into policymaking and operations.

| STRATEGY/ACTION | | LEAD OFFICE | |
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| 5.1.1 | Quantitative Data | <ul style="list-style-type: none"> Collect and analyze available data across all phases of the employment lifecycle, including outreach, recruitment, hiring, development, promotions, and attrition. Where data gaps exist, develop a process and timetable for collecting the data. Develop a process and timetable for collecting and analyzing applicant flow data for mission critical occupations, including executive positions where applicable. | OMWI, DOD, DA |
| 5.1.2 | Voluntary Self-reported Demographic Data | <ul style="list-style-type: none"> Evaluate the feasibility of developing and launching a campaign to improve the collection of voluntarily self-reported demographic data, including sexual orientation and gender identity (SOGI) data, in accordance with applicable law, guidance, and privacy considerations, to provide a more complete understanding of the diversity of the CFTC workforce. Analyze available voluntarily self-reported demographic data for the overall CFTC workforce and for Divisions/Offices and Regional Offices to better understand the diversity of the CFTC workforce. | OMWI, DOD, DA |
| 5.1.3 | Qualitative Data | <ul style="list-style-type: none"> Gather and analyze qualitative data to better understand the employee experience in the CFTC workforce across grade levels, divisions, offices, regions, and demographic backgrounds. Engage the workforce in new "Voice of the Employee" opportunities to gain insights to improve the employee experience. These opportunities are feedback mechanisms that can include the use of employee surveys, stay and exit interviews, pulse checks, and listening sessions. Strive to improve employee participation in OPM's annual Federal Employee Viewpoint Survey (FEVS) through education, awareness, and communication strategies. | OMWI, DOD, DA |
| 5.1.4 | Evaluation and Analysis | <ul style="list-style-type: none"> Develop and deploy a DEIA data dashboard that provides demographic information and actionable insights on data across the employment lifecycle, in accordance with applicable laws, guidance, and privacy considerations. Improve the process by which FEVS results are analyzed and briefed to all CFTC executives, managers, and supervisors. Expand access to and analysis of exit interviews to measure and identify reasons for attrition to inform retention strategies. | OMWI, DOD, DA |

Goal 6. EQUITY IN PROCUREMENT AND CUSTOMER EDUCATION AND OUTREACH: Develop and implement policies, procedures, and practices to advance equity for underserved communities in procurement and customer education and outreach.

Objective 6.1 Develop and implement standards and procedures to support the inclusion and utilization of minority, women, and veteran-owned businesses in procurements and contracts.

| STRATEGY/ACTION | | | LEAD OFFICE |
|-----------------|--------------------|--|---------------|
| 6.1.1 | Supplier Diversity | <ul style="list-style-type: none"> • Post educational and technical assistance materials and guidance on the CFTC public facing website to educate suppliers about the CFTC procurement process and communicate procurement and contracting opportunities. • Explore opportunities to engage in outreach to promote the utilization of minority-owned, women-owned, and veteran-owned businesses in CFTC business activities. • Strive to consistently meet federal goals for procurements awarded to small disadvantaged businesses. | DA, OMWI, OPA |

Objective 6.2 Deploy inclusive customer education and outreach initiatives to enhance the public’s understanding of the CFTC’s mission.

| STRATEGY/ACTION | | | LEAD OFFICE |
|-----------------|---------------------------------|---|----------------|
| 6.2.1 | Customer Education and Outreach | <ul style="list-style-type: none"> • Extend customer education and outreach efforts to underserved communities. • Explore opportunities to partner with other agencies and organizations to build relationships and facilitate outreach to underserved communities. | OPA, OTI, OMWI |

MONITORING AND EVALUATING

The CFTC will regularly assess the effectiveness of DEIA within our workforce policies and culture and will seek to continuously improve DEIA across the agency. The Government-wide Plan identifies the utilization of a DEIA Maturity Model as a tool to advance DEIA and as an industry best practice for improving organizational DEIA outcomes that enables agencies to identify their DEIA maturity along a continuum. An example DEIA Maturity Model is included in the Government-wide Plan at Appendix II.

APPENDIX A: GLOSSARY OF TERMS

Accessibility

The design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them. Accessibility includes the provision of accommodations and modifications to ensure equal access to employment and participation in activities for people with disabilities, the reduction or elimination of physical and attitudinal barriers to equitable opportunities, a commitment to ensuring that people with disabilities can independently access every outward-facing and internal activity or electronic space, and the pursuit of best practices such as universal design.⁹

Barrier

An agency policy, principle, or practice that limits or tends to limit employment opportunities for members of a particular EEO group based on their sex, race, ethnic background, or disability status.¹⁰

Diversity

The practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities.¹¹

Equity

The consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.¹²

Inclusion

The recognition, appreciation, and use of the talents and skills of employees of all backgrounds.¹³

Individual with a Disability

A physical or mental impairment that substantially limits one or more of the major life activities of such an

⁹ Executive Order 14035, 86 Federal Register 34593. (June 25, 2021). *Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. <https://www.federalregister.gov/documents/2021/06/30/2021-14127/diversity-equity-inclusion-and-accessibility-in-the-federal-workforce>.

¹⁰ U.S. Equal Employment Opportunity Commission. *Instructions to Federal Agencies for EEO MD-715: Section II Barrier Identification and Elimination*. <https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715-1>.

¹¹ Executive Order 14035, 86 Federal Register 34593. (June 25, 2021). *Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. <https://www.federalregister.gov/documents/2021/06/30/2021-14127/diversity-equity-inclusion-and-accessibility-in-the-federal-workforce>.

¹² Executive Order 14035, 86 Federal Register 34593. (June 25, 2021). *Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. <https://www.federalregister.gov/documents/2021/06/30/2021-14127/diversity-equity-inclusion-and-accessibility-in-the-federal-workforce>.

¹³ Executive Order 14035, 86 Federal Register 34593. (June 25, 2021). *Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. <https://www.federalregister.gov/documents/2021/06/30/2021-14127/diversity-equity-inclusion-and-accessibility-in-the-federal-workforce>.

individual; a record of such an impairment; or being regarded as having such an impairment.¹⁴

Reasonable Accommodation

Any change in the work environment or in the way that things are customarily done that enables an individual with a qualifying disability to enjoy equal opportunities. A qualified individual with a disability is entitled to an “effective accommodation,” which may or may not be the preferred accommodation of the individual.¹⁵

Section 508

Shorthand reference for Section 508 (Federal Electronic and Information Technology) of the Rehabilitation Act of 1973, as amended. Section 508 applies to all federal agencies when developing, procuring, maintaining or using electronic and information technology and requires federal agencies to ensure that this technology is accessible to employees and members of the public with disabilities to the extent it does not pose an undue burden.¹⁶

Underserved Communities

Populations sharing a particular characteristic, as well as geographic communities, who have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. In the context of the federal workforce, this term includes individuals who belong to communities of color, such as Black and African American, Hispanic and Latino, Native American, Alaska Native and Indigenous, Asian American, Native Hawaiian and Pacific Islander, Middle Eastern, and North African persons. It also includes individuals who belong to communities that face discrimination based on sex, sexual orientation, and gender identity (including lesbian, gay, bisexual, transgender, queer, gender non-conforming, and non-binary (LGBTQ+) persons); persons who face discrimination based on pregnancy or pregnancy-related conditions; parents; and caregivers. It also includes individuals who belong to communities that face discrimination based on their religion or disability; first-generation professionals or first-generation college students; individuals with limited English proficiency; immigrants; individuals who belong to communities that may face employment barriers based on older age or former incarceration; persons who live in rural areas; veterans and military spouses; and persons otherwise adversely affected by persistent poverty, discrimination, or inequality. Individuals may belong to more than one underserved community and face intersecting barriers.¹⁷

¹⁴ Definitions, Definition of “disability”, 29 C.F.R. § 1630.2. (2011). <https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XIV/part-1630/section-1630.2>.

¹⁵ Definitions, Reasonable accommodation, 29 C.F.R. § 1630.2(o)(1)(i-iii) (2011) <https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XIV/part-1630>.

¹⁶ U.S. Access Board (n.d.) Section 508. In U.S. Access Board “About” Section. Retrieved February 2024 from <https://www.access-board.gov/about/law/ra.html#section-508-federal-electronic-and-information-technology>.

¹⁷ Executive Order 14035, 86 Federal Register 34593. (June 25, 2021). *Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. <https://www.federalregister.gov/documents/2021/06/30/2021-14127/diversity-equity-inclusion-and-accessibility-in-the-federal-workforce>.

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