

State of Bureau Websites and Digital Services

Response to 21st Century Integrated Digital Experience Act
reporting requirement

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1. Introduction

The 21st Century Integrated Digital Experience Act or the 21st Century IDEA (“the Act”)¹ seeks to improve the digital services of executive agencies by laying out requirements for website and digital service development. The best practices detailed in the Act include accessibility in accordance with Section 508 of the Rehabilitation Act of 1973², consistent visual design, attention to user needs, functionality on mobile devices, and providing web services over a standard secure connection.

As a 21st century agency, the Consumer Financial Protection Bureau (Bureau) has maintained high standards for our digital services since its inception. Overall, our website and digital services are modern and accessible, meeting both the requirements of the Act and ensuring the public can easily engage with the information and guidance provided by the Bureau.

To fulfill the annual reporting requirements of the Act, this report provides a list of the Bureau’s publicly available websites and digital services, an indication of which of these services require modernization to meet the requirements of the Act, and an estimation of the cost and schedule for doing this modernization. This report will be made publicly available on the Bureau’s website as well as being sent to Congress and to the Director of the Office of Management and Budget (OMB).

¹ Public Law No. 115-336.

² 29 U.S.C. § 794d.

2. CFPB websites and digital services

Since its creation in 2011, the Bureau has invested in using technology to advance its mission. The Bureau established a unique-to-government in-house technical team with the expertise to build and maintain the website and digital services with attention to user needs and modern, secure development standards. That team maintains and iteratively improves the Bureau’s primary website, www.consumerfinance.gov, ensuring that it continues to meet the standards of the Act. The Bureau’s primary transactional digital service, the “Submit a Complaint” form³, is similarly fully accessible and built to ensure users can fill out the form accurately and efficiently.

In 2021, the Bureau made information easier for the public to find as well as improved the internal security and stability of our platform. As part of our goal of being a data-driven agency, the Bureau improved the availability of public data by introducing the ability to easily create 508-compliant interactive data charts. Behind the scenes, Bureau teams continued to expand automated testing, expanded, replaced or updated legacy software, and increased our open-source design system⁴ documentation.

The Bureau also continued to respond quickly to the ongoing pandemic and consumer needs, by releasing and updating several key resources on our website:

- Released the Small Business Lending Rulemaking section⁵, which includes a landing page, an opportunity for small businesses to tell their story, documentation of the proposed rule, and video explainers
- Updated the “Paying for College” suite to include a graduation path tool, with a focus on repaying student loans, non-first year students, and integrating Department of Education data⁶
- Added content to explain the Bureau’s role in addressing racial and economic inequity⁷

³ <https://www.consumerfinance.gov/complaint/getting-started/>

⁴ <https://cfpb.github.io/design-system/>

⁵ <https://www.consumerfinance.gov/about-us/small-business-lending/>

⁶ <https://www.consumerfinance.gov/paying-for-college/your-financial-path-to-graduation/>

⁷ <https://www.consumerfinance.gov/about-us/racial-equity/>

- Used human-centered design, including usability testing, to streamline how tech workers can alert the Bureau to potential violations of federal consumer financial laws⁸
- Conducted usability testing for a forthcoming homepage redesign

Additionally, in 2021, the Bureau conducted two tech sprints to help support and improve our approach to digital services. On March 22-26, 2021, the CFPB hosted the Home Mortgage Disclosure Act (HMDA) Virtual Tech Sprint. After an application process and a week of brainstorming and networking activities, tech sprint participants formed 17 teams to develop solutions on either the HMDA Data Submissions Track or the HMDA Data Publications Track. From August 18 – December 5, 2021, the Bureau participated in the Census Opportunity Project by sponsoring a tech sprint to prevent financial hardship and housing insecurity.

2.1 List of websites and digital services

The Bureau maintains one primary public website that is its primary tool for public engagement and dissemination of information. The Bureau has purposefully limited the creation of micro-sites or secondary sites to prevent duplication and confusion on the part of the public, and almost all of the sites or subdomains listed below are navigable from the main site.

The Bureau does not maintain any public-facing “apps” (such as would be found in an app store) or non-web-based digital services. Two of the Bureau’s digital services provided for specific, target audiences require further modernization to meet the standards of the Act.

TABLE 1: CFPB WEBSITES AND DIGITAL SERVICES

Description	URL	21 st Century IDEA standards ⁹
Primary website, vast majority of information and tools for public engagement found here	www.consumerfinance.gov	Meets all standards
Public complaint submission form and secure company and consumer portals	complaint.consumerfinance.gov	Meets all standards

⁸ <https://www.consumerfinance.gov/about-us/blog/cfpb-calls-tech-workers-to-action/>

⁹ Public Law No. 115-336.

Description	URL	21 st Century IDEA standards ⁹
HMDA ¹⁰ information portal and data browser	ffiec.cfpb.gov	Meets all standards
Library of frequently asked questions for HMDA filers, known as HMDA Help	hmdahelp.consumerfinance.gov/knowledgebase/	Has not been audited for Section 508 compliance, inconsistent appearance, limited data on user needs
Online portal for financial institutions to submit prepaid account agreements and credit card plan terms	collect.consumerfinance.gov	Meets all standards
Online portal for financial institutions subject to an examination to share files with Bureau examiners	extranet.cfpb.gov	Has not been audited for Section 508 compliance, limited data on user needs and behaviors tracked

¹⁰ Home Mortgage Disclosure Act, 12 U.S.C. § 2801 et seq.

3. Looking ahead

While the ongoing coronavirus pandemic changed many priorities in 2021, the Bureau continued to maintain a high standard for our digital products. Going forward, the Bureau will seek to maintain this culture of technical innovation and continue to follow the best practices described in the Act to ensure all standards are met in the future.

3.1 Estimates for modernization

The Bureau's Extranet and HMDA Help digital services continue to require further modernization to meet the standards of the Act.

To begin to address requirements around Section 508 and user needs to the Extranet, the Bureau intends to conduct an assessment project to document and prioritize accessibility gaps and critical issues. This assessment project was previously estimated to take three months of part-time labor at a cost of \$10,000 to complete. Once prioritized and resourced, this effort will provide an updated estimation of the additional development work, cost, and schedule to address the identified usability and modernization opportunities. In addition, information from this assessment may be used to inform a future decision on whether to migrate core Extranet functionality to a shared platform service or continue to iterate on the current platform. This migration is also currently under consideration as part of a larger cloud migration project.

Though originally slated for 2021, updates to the HMDA Help site to introduce consistent visual design and address the 508 accessibility gap will be part of a larger design review of the HMDA Platform scheduled to begin in 2022. This work would bring the HMDA Help sub-site into the larger <https://ffiec.cfpb.gov> site ecosystem, allowing it to leverage shared assets and visual styles. This work was previously estimated to take three months of part-time labor at a cost of \$10,000 to complete. Once prioritized, the Bureau will validate the previous cost estimates.