

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 (CFPB) has maintained high standards for our digital services since our 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 CFPB.

To fulfill the annual reporting requirements of the Act, this report provides a list of the CFPB’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 CFPB’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 CFPB has invested in using technology to advance its mission. The CFPB 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 CFPB's primary website, www.consumerfinance.gov, ensuring that it continues to meet the standards of the Act. The CFPB'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 2022, the CFPB continued to make information easier for the public to find and improved the internal security and stability of our platform. As part of our goal of being a data-driven agency, the CFPB improved the availability of public data by introducing an open data inventory. Additionally, the CFPB conducted an initiative to measure the performance of its digital assets and reduce the overall maintenance burden of those that were underperforming. Behind the scenes, the CFPB teams continued to expand automated testing, replaced or updated legacy software, and increased our open-source design system⁴ documentation.

The CFPB also continued to respond to the consumer needs by releasing and updating several key resources on our website:

- Completed a mobile-first redesign of the consumerfinance.gov homepage
- Took a research-based redesign of consumerfinance.gov/learnmore pages⁵, one of the CFPB's most highly trafficked web pages
- Updated the pre-complaint funnel⁶ to expand understanding of the complaint process
- Updated the design and content of the "repay student debt" tool⁷

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

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

⁵ <https://www.consumerfinance.gov/learnmore/>

⁶ <https://www.consumerfinance.gov/complaint/>

⁷ <https://www.consumerfinance.gov/paying-for-college/repay-student-debt/federal-student-loans/>

2.1 List of websites and digital services

The CFPB maintains one primary public website that is its primary tool for public engagement and dissemination of information. The CFPB 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 the sites or subdomains listed below are navigable from the main site.

The CFPB 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 CFPB’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 ⁸ |
|--|--|--|
| 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 |
| HMDA ⁹ 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 |

⁸ Public Law No. 115-336.

⁹ Home Mortgage Disclosure Act, 12 U.S.C. § 2801 et seq.

3. Looking ahead

In 2022 the CFPB continued to maintain a high standard for our digital products. Going forward, the CFPB 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.

The CFPB's Extranet and HMDA Help digital services continue to require further modernization to meet the standards of the Act. Work is tentatively planned to modernize the Extranet, but the HMDA help website is currently out of scope.

3.1 Estimates for modernization

To begin to address requirements around Section 508 and user needs to the Extranet, the CFPB intends to conduct an assessment 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.

3.2 Out of scope

Though presented as a need in the previous edition of this report, the HMDA Help website will not be updated at this time. The HDMA Help website was built on a legacy version of the Salesforce platform. The current user base is a very small subset of the reporting industry, and it is not cost effective to update the website at this time. Instead, the HMDA Help website will be modernized after the successful launch of the Small Business Lending Rule Data Collection System and its associated help website¹⁰.

¹⁰ The Small Business Lending Rule Data Collection System will be a new web application with functionality similar to ffiec.cfpb.gov and hmdahelp.consumerfinance.gov/knowledgebase/.