

State of Bureau Websites and Digital Services

Response to 21st Century Integrated Digital Experience Act
reporting requirement

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1. Introduction

On December 20, 2018, the President signed into law the 21st Century Integrated Digital Experience Act or the 21st Century IDEA (“the Act”), Public Law No. 115-336. The Act, which is applicable to the Consumer Financial Protection Bureau as an executive agency, mainly seeks to improve the digital services of executive agencies.

According to the Act, the Bureau’s Director is required to submit information to Congress and to the Director of the Office of Management and Budget (OMB) about the state of Bureau websites and digital services as compared with best practice requirements detailed in the Act. These best practices include accessibility in accordance with section 508 of the Rehabilitation Act of 1973¹, consistent visual design, attention to user needs, functionality on mobile devices, and providing web services over a standard secure connection.

To fulfill the 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. As a 21st century agency, the Bureau has maintained high standards for our digital services since its inception. Overall, the 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.

¹ 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.

In 2016, the Bureau launched a redesign of our primary website, www.consumerfinance.gov, which included visible changes like establishing a consistent visual design, easier navigation options, and accessibility improvements, as well as under-the-hood updates to the code base and templates that made the site faster, more reliable, and more secure.

Since then, the Bureau has continued to improve and iterate on its digital services. In 2017, the Bureau developed an extensive accessibility audit process and continues to perform manual audits of the site in addition to automated tools that ensure regular code deployments meet accessibility guidelines. The Bureau’s primary transactional portion of the site, the submit a complaint form², was enhanced that same year, based on feedback from stakeholders and consumers, to make it easier for users to fill out the form accurately and efficiently.

In 2018, the Bureau performed additional work to optimize the performance of the website, so that it is usable even on slow data connections, and the digital team follows “progressive enhancement” best practices, so that the site continues to work even if a script, image, font, or other asset fails to load.

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 in order 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.

² <https://www.consumerfinance.gov/complaint/getting-started/>

The Bureau does not maintain any public-facing “apps” (such as would be found in an app store) or non-web-based digital services.

TABLE 1: CFPB WEBSITES AND DIGITAL SERVICES

Description	URL	21 st Century IDEA standards ³
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 ⁴ 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 and behaviors collected
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

Two of the Bureau’s digital services provided for specific, target audiences require further modernization in order to meet the standards of the Act. Of these two services, the Bureau will prioritize updates to the Extranet, followed by updates to the HMDA Help tool.

³ 21st Century IDEA - 44 U.S.C. § 3501 note.

⁴ Home Mortgage Disclosure Act, 12 U.S.C. § 2801 et seq.

3. Looking ahead

In 2019, the Bureau made progress in implementing the requirements described in the Act across several digital services and continues to follow best practices to ensure these standards are met in the future. The Bureau has implemented a Design System, combining existing code and design templates into a single repository to ensure consistent designs, 508 compliance, and mobile accessibility across services. The Bureau also continues to make use of user research, analytics, and a user experience team to ensure that all services are designed to meet user needs and that required tasks can be completed efficiently. In 2019, all members of the Bureau's Design and Development Team participated in accessibility audit training and conducted individual audits to ensure ongoing Section 508 support.

3.1 Estimates for modernization

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

In order to begin to address requirements around Section 508 and user needs to the Extranet, the Bureau intends to conduct a discovery project to explore migrating core functionality to a shared platform service. This discovery project is anticipated to last 12 weeks in calendar year 2020 and is estimated to cost \$460,000. An expected output of the discovery project is an estimation of the cost and schedule to address identified usability and modernization opportunities.

Updates to the HMDA Help site to introduce consistent visual design and address 508 accessibility will be part of a larger design review of the HMDA Platform. 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 is estimated to take three months of part-time labor at a cost of \$10,000 to complete. This effort is not scheduled for calendar year 2020 due to existing commitments and timelines.