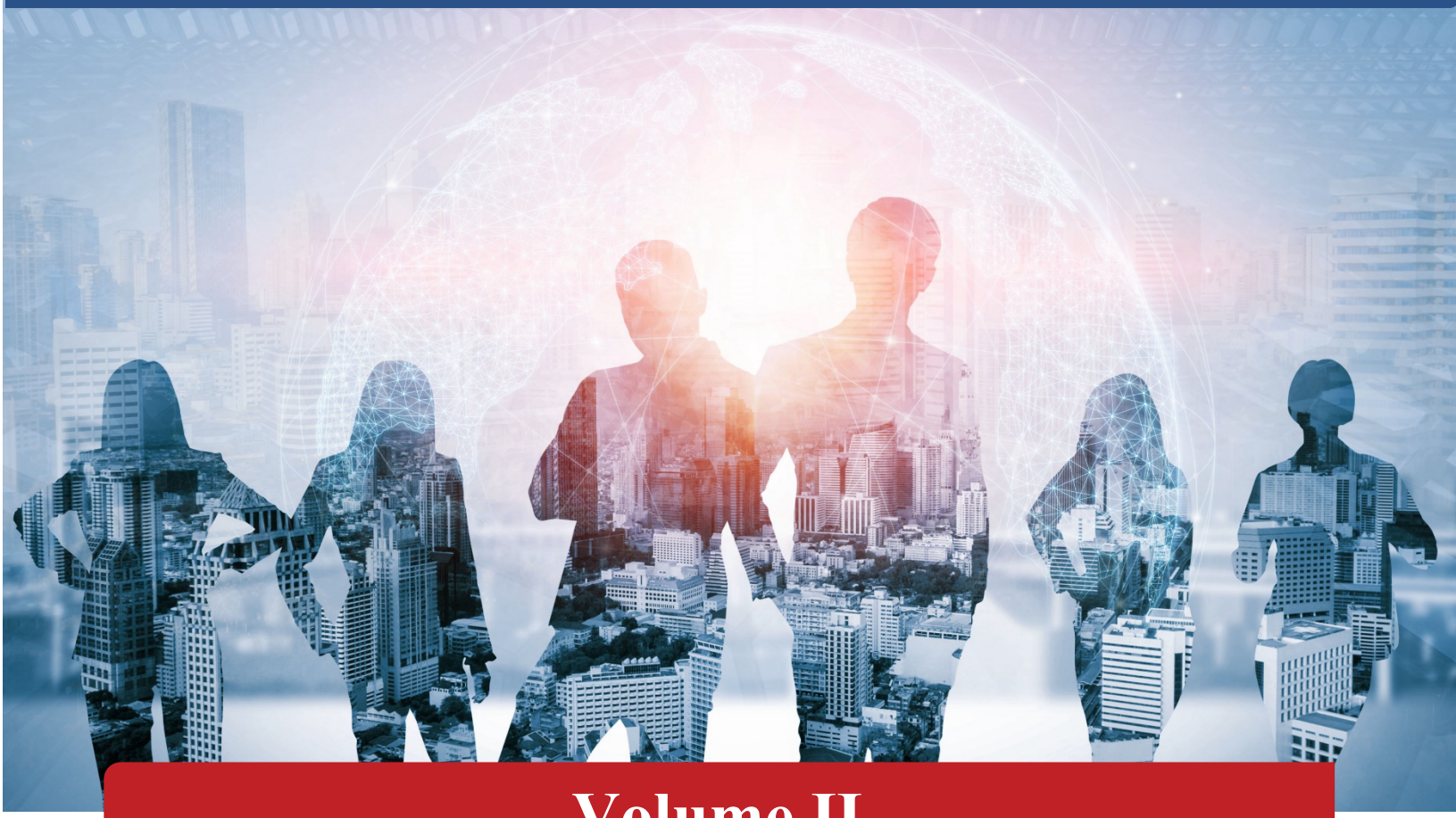

Volume II

Stealth Solutions, Inc.
Response
to

The Office of the Comptroller of the Currency (OCC)
Enterprise Business Automation and Content Management Services (EBACMS)
SOLICITATION No: 2031JW24Q00021
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Executive Summary

Team Stealth has thoroughly analyzed all of OCC's current environment, challenges, objectives, and desires to bring the Enterprise Business Automation and Content Management Services into an advanced future proof Cloud Platform based infrastructure. Our analysis has led to our proposed recommendations and complete explanation of how to most efficiently complete this multi-year task.

As the Office of the Controller of the Currency (OCC) embarks on this strategic initiative to modernize its digital infrastructure, the requirement for a robust, secure, and versatile content management system (CMS) is paramount. Team Stealth's proposed solution involves transitioning the OCC's on-premises CMS to a cloud-based Drupal solution. The migration aligns with the OCC's vision to leverage the flexibility, scalability, and innovation that cloud technology offers, enhancing the management and delivery of digital content across its seven primary websites and services.

Acquia's cloud platform, a leading open-source CMS platform, is renowned for its extensive feature set that caters to complex content management needs. It stands out for its strong security framework, which is compliant with FedRAMP moderate requirements, making it an ideal candidate for government agencies prioritizing data integrity and security. Its PaaS capabilities allow for seamless integration with existing OCC technologies and the flexibility to adapt to evolving digital demands.

Acquia, as our chosen platform for hosting the Drupal CMS, brings its FedRAMP Moderate authorization to the forefront, ensuring that the solution meets the stringent security controls required for federal data systems. Acquia's cloud platform is optimized for Drupal, providing a secure, resilient, and compliant environment that enhances Drupal's capabilities.

The partnership between Acquia Cloud Platform and Drupal CMS offers a multitude of benefits tailored to OCC's unique requirements. It ensures a seamless migration experience, robust performance at scale, and a secure hosting environment that meets federal security standards. Moreover, the Acquia-Drupal pairing provides the OCC with an agile platform that supports current and future digital strategies, driving efficiencies and improving stakeholder engagement through advanced digital experiences.

In summary, the Acquia-Drupal solution presents a forward-looking approach that not only meets the current requirements of the OCC but also establishes a foundation for digital excellence in line with federal guidelines and best practices. This coupled with Team Stealth's experience to deliver against our migration strategy and benefits of choosing Acquia-Drupal for the OCC's CMS needs are illustrated throughout this proposal volume.

1. Factor 1: FedRAMP Authorization

The OCC's Enterprise Business Automation and Content Management Services (EBACMS) is embarking on an initiative to modernize its Content Management System (CMS) and improve digital services. The primary goal is to replace the outdated on-premises Percussion Rhythmyx CMS with a new FedRAMP-authorized moderate Platform as a Service (PaaS) or Software as a Service (SaaS) solution, migrating the content of OCC's seven websites and associated digital services in the process.

Team Stealth, in collaboration with Acquia, recommends Acquia's cloud-based solution. The Acquia Platform provides a secure Platform-as-a-Service (PaaS) cloud environment for the Drupal web content management system (WCMS). It includes advanced multi-site management, robust developer tools, and Software-as-a-Service (SaaS) capabilities. The components of the Acquia Platform are designed with an API-first approach, allowing easy customization for specific customer needs and environments.

Drupal, the world's most widely used open-source enterprise solution for web content management and digital experiences, supports personalized, multichannel experiences, and integrated content and commerce experiences. Drupal extends beyond traditional web browsers to create engaging experiences across web, mobile, social, and more. With a focus on content creation, sharing and distribution, Drupal utilizes a flexible content architecture, open APIs, and integration capabilities to expose content and applications to diverse audiences across channels, devices, and other applications.

Acquia FedRamp package identifiers are provided in the following table:

FedRamp Package ID	F1302201919
Total number of Authority to Operate (ATO) or Authority to Use (ATU) letters on file with the FedRAMP PMO. This includes the initial ATO and any direct reuse ATO/ATUs issued by a federal	23
Authorization Date	04/13/2016
Service Model	PaaS
Impact Level	Moderate

Acquia is a Federal Risk Authorization and Management Program (**FedRAMP Moderate**) authorized system and has received an agency Authority to Operate (ATO) from the **Department of the Treasury**. Acquia also holds over 23 publicly recognized ATOs and dozens of others with federal agencies. Acquia Cloud is built on Amazon AWS and inherits infrastructure layer controls from Amazon. Amazon AWS has received FedRAMP authorization for the infrastructure layer.

Additionally, Acquia holds a Defense Information Systems Agency (DISA) authorization at a security Impact level 2 for the United States Navy and has been designed to meet NIST 800-53 standards for subscribers.

2. Factor 2: Corporate Experience:

Stealth Solutions and Bravent make up the core of Team Stealth that provide the project implementation, customization, testing, and ongoing support services expertise for this OCC EBACMS project. We have recommended the use of Acquia's cloud platform for the seven websites and have formed a CTA with Carahsoft Technologies that provide all Acquia platform software components via their MAS contract schedule. Below is our introduction to the team members and three experience examples that demonstrate our team's ability to successfully deliver all requested RFP requirements, on time and on budget.

Stealth is a Virginia-based SBA-certified 8a small business incorporated in 2014. Stealth is a contract vehicle holder for both 8a STARS III and GSA's Multiple Award Schedule (MAS).

Stealth's overall corporate capabilities are Cloud Implementation and support, Digital Content (websites) and Asset (documents) Management, Business Process Assessment, Technical Project Management, and Grants Management System Implementation. Our core experience is assisting Federal, State, and local government agencies in achieving performance and operational efficiencies. We achieve proficiencies by optimizing business processes, migrating to, and implementing Cloud-based solutions, and consolidating and

integrating legacy systems to provide a 360-degree view of information on a highly secured Cloud, accessible from everywhere via any web-enabled device.

Bravent is a premiere Web Development and Support Services provider for enterprise-level implementations. Bravent's core web-based expertise is Acquia's Drupal, open-source technology, Microsoft solutions, and DevSecOps. Bravent is a small business formed in 2013 and has developed and supported large-scale Drupal implementations for Federal Agencies like GSA, Department of Commerce, DCMA, GSA, and NIH.

Carahsoft Technology Corp. is The Trusted Government IT Solutions Provider®, supporting Public Sector organizations across Federal, State and Local Government agencies and Education and Healthcare markets. Working with resellers, systems integrators and consultants, our sales and marketing teams provide industry leading IT products, services, and training through hundreds of contract vehicles.

Acquia, a pioneer in cloud-based digital experience management solutions, empowers forward-thinking organizations to redefine citizen engagement. The Acquia platform ensures agility, enabling organizations to meet evolving digital demands and accelerate innovation. With a secure Platform-as-a-Service (PaaS) cloud environment, Acquia supports Drupal web content management system (WCMS) and Node.js, providing advanced multi-site management, robust developer tools, and Software-as-a-Service (SaaS) capabilities for personalization and journey orchestration. Founded in 2007 by Dries Buytaert, the creator of Drupal, Acquia has a global presence with over 780 employees in 14 offices. Recognized as a leader in the Gartner Web Content Management Magic Quadrant from 2015 to 2022, Acquia is trusted by over 4,000 organizations worldwide. Acquia's extensive experience extends to supporting critical sites for various government entities, including the US Department of Treasury, IRS.gov, SEC, Fannie Mae, and more.

2.1. Notable Federal Department-Level Websites Implementations by Team Stealth

Team Stealth has assisted multiple federal agencies to move into a web-based digital services environment. This includes support for vision development and a roadmap to the establishment of cloud-based solutions that properly support the migration of existing services to the newly deployed cloud solution. Below is a representation of websites and projects delivered from Team Stealth.

URL	Project
https://www.commerce.gov	The main website of the Department of Commerce (DOC)
https://www.ntia.gov/	NTIA main website
https://broadbandusa.ntia.doc.gov	Website that supports BroadbandUSA
https://www.its.bldrdoc.gov/	The Institute for Telecommunication Sciences (ITS) public website

URL	Project
https://spectrum.gov	The Federal Government Spectrum Compendium public website
https://www.Mbda.gov	Minority Business Development Agency's website
https://ocio.commerce.gov	Office of the Chief Information Officer, DOC
https://ogc.commerce.gov	Office of the General Counsel, Dept of Commerce website
https://socmed.commerce.gov	Social media
https://staff.commerce.gov	Staff Directory website
https://www.gsa.gov/	Central GSA site with access to all of the GSA's resources.
https://www.usa.gov/	Large and popular Drupal implementation which is an online guide to government information and services.
https://www.acquisition.gov/	Federal government's only resource for everything acquisition.
https://www.section508.gov/	Federal government's central website containing accessibility guidelines
https://www.eda.gov/	US Economic Development Administration website

2.2. Corporate Experience Examples

2.2.1. Example 1: General Services Administration

Project Title: GSA Enterprise Content Application Service (ECAS) Environment Application and Website Portfolio.
Contract Number – Task Order Number: GS35F0623N - 47HAA019F0333

1. Contractor Name: Bravent LLC — Role on Project: Sub

2. Contractor Address: 25363 Justice Dr, Chantilly, VA, 20152	3. Contract Type: Firm Fixed Price
4. Procuring Agency/Company Name: GSA	5. Agency/Company POC: Kevin M. White, Directory of Contracts, REI Systems (Prime Contractor) Address: 45335 Vintage Park Plaza, Sterling, VA 20166 Phone :571-926-4781 kwhite@reisystems.com
6. Period of Performance: 09/30/2019-09/30/2024	7. Dollar Amount of Award: 18.5 million

8. **Description of Scope:**

This initiative involves the provision of products, services, and maintenance for GSA IT Management within a cloud-based DevOps and Agile application development and operations environment Platform

as a Service (PaaS). The scope extends to the development, modernization, and enhancement (DME), as well as the operations and maintenance (O&M) for a portfolio of government websites and applications.

The GSA Office of Government-wide Policy (OGP) oversees this portfolio, supporting communication and coordination for agencies, departments, and occasionally industry partners across the Federal Government. These applications play a crucial role in aiding civil servants in various tasks such as streamlining acquisitions, advancing performance management practices, and ensuring universal accessibility. Notably, GSA's unique relationship with agencies, the White House, and OMB means that each application serves multiple stakeholders.

In addition to supporting government operations, GSA's mission includes demonstrating technology leadership by adhering to industry best practices. The following are examples of websites developed and maintained under this effort:

1. GSA.gov	2. USA.gov
3. Performance.gov	4. ITDashboard.gov
5. Acquisition.gov	6. Digitaldashboard.gov
7. Section508.gov	8. IDManagement.gov
9. Buyaccessible.gov (the Buy Accessible Wizard)	10. PIC.gov
11. SFTOOL.gov	12. FMI.gov

9. **Relevancy of Work**:

Our extensive engagement with GSA uniquely positions us to address the Office of the Comptroller of the Currency's (OCC) requirements in transitioning from legacy Content Management Systems (CMS) to modern platforms, with a specific emphasis on creating a strategic plan for leveraging cloud computing resources to enhance and optimize digital services. Drawing from our successful track record with GSA, we specialize in developing and executing comprehensive strategies that harness the power of cloud environments, delivering operational efficiencies and ensuring a robust return on investment (ROI).

In our collaboration with GSA, we provided a broad range of services for numerous government websites and applications, strategically focusing on development, modernization, enhancement, and ongoing maintenance. A key component of our approach involved the establishment of a cloud-based DevOps and Agile application development and operations environment, aligning seamlessly with industry standards and leveraging cutting-edge technological advancements.

Our expertise is demonstrated in the successful migration of multiple legacy systems, including proprietary CMS, to the latest Drupal versions, showcased in projects such as GSA.gov, USA.gov, and Acquisition.gov. The emphasis on a seamless transition with minimal downtime, preserving critical functionalities, and enhancing performance and security underscores our commitment to excellence. A critical aspect of our migration strategy was the deliberate move from on-premises setups to cloud-based platforms, leveraging leading solutions from Acquia and AWS. This transformation not only streamlined operations but also provided scalability and

enhanced reliability, addressing the unique challenges posed by high-traffic government websites.

Central to our approach was the consolidation of various applications into a unified Drupal platform, yielding remarkable operational efficiencies. Our solutions effectively reduced redundancy, streamlined content management processes, and fostered more efficient collaboration across diverse departments and agencies. These modernization initiatives translated into tangible cost savings and an impressive ROI for GSA.

Aligned with GSA's mission of demonstrating technology leadership, our projects incorporated best industry practices. We meticulously ensured compliance with federal standards, including stringent security protocols and accessibility guidelines, solidifying GSA's role as a technological leader.

Our experience with the GSA ECAS project, which encompasses maintaining 25 external and internal Drupal sites, closely mirrors the scope and size of the OCC project. The successful migration of Drupal 7 sites to Drupal 9/10, coupled with the development of a modern CI/CD platform, serves as a testament to our ability to deliver comprehensive solutions. Noteworthy websites like GSA.gov and Acquisition.gov, comparable in scope and size to OCC.gov, have undergone seamless migrations. This process involved migrating millions of pages, images, and documents to Drupal 9/10 sites, all operating seamlessly from a single code base with multiple servers and a robust CDN infrastructure. This demonstrates our commitment to creating and executing strategic plans that leverage cloud-based technologies to optimize digital services effectively.

2.2.2. Example 2: Department of Commerce

Project Title – Department of Commerce, Office of the Secretary, Office of Chief Information Officer – IT Operations and Maintenance. **Contract Number – Task Order Number:** HHSN316201200065W	
1. Contractor Name: Bravent LLC Role on Project: Sub	
2. Contractor Address: 25363 Justice Dr, Chantilly, VA, 20152	3. Contract Type: T&M
4. Procuring Agency/Company Name: Department of Commerce	5. Agency/Company POC: Munish Pathak, CTO, Patriot LLC 9520 Berger Road Suite #212 Columbia, MD 21046 Phone: 571-263-3777
6. Period of Performance: 06/07/2016- 03/30/2023	7. Dollar Amount of Award: $8,272,215.61

8. **Description of Scope:**

The Department of Commerce (DOC) Office of the Chief Information Officer (OCIO), specifically the Office of Enterprise Services and Solutions (OESS), is entrusted with delivering comprehensive IT solutions to the DOC. This project focuses on the seamless delivery and support of enterprise solutions, covering the entire spectrum from managing solution delivery projects, eliciting and analyzing requirements, to architecting, designing, developing, acquiring, configuring, integrating, testing, deploying, operating, maintaining solutions, and providing adept customer support.

Department Overview:

With a multitude of responsibilities spanning trade, economic development, technology, entrepreneurship, business development, environmental stewardship, statistical research and analysis, the DOC plays a vital role in advancing the nation's interests. The Office of the Secretary (OS), specifically the OCIO, spearheads information technology leadership to propel the DOC's mission.

Our Support to DOC OCIO:

We extended robust support to DOC OCIO, encompassing a diverse range of enterprise services provided through the Office of Enterprise Solutions and Services. This includes leveraging a portfolio of industry-leading technologies, methodologies, and practices that align with the strategic goal of adopting a cloud-based rapid application/Agile development platform to modernize existing systems. Our role involved meticulous planning, configuration, and implementation of commercial-off-the-shelf (COTS) software solutions, coupled with the agile migration of custom-coded applications and data to on-premises and cloud environments (SaaS, PaaS, and IaaS) and COTS applications.

Project Objectives:

- Ensure the continued operation and support of existing OESS-provided solutions.
- Enhance solutions to meet new requirements and improve sustainability and maintainability.

- Deliver new solutions to address emerging requirements.

Project Scope:

- Lifecycle Support of Websites
- Drupal and PHP Website Development
- Operation and Maintenance – System Administration and DevSecOps
- Salesforce Integration Services
- Project Management
- Assessment and Authorization (A&A) Support
- SharePoint Support

Team Stealth has supported following websites for DOC:

1. https://www.commerce.gov – The main website of Department of Commerce built with Drupal 9.
2. https://www.Mbda.gov – Minority Business Development Agency's website.
3. https://ocio.commerce.gov - Office of the Chief Information Officer, Dept of Commerce website
4. https://ogc.commerce.gov - Office of the General Counsel, Dept of Commerce website
5. https://socmed.commerce.gov – Social Media Tracker
6. https://acetool.commerce.gov - Assess Costs Everywhere (ACE) provides manufacturers with the top reasons for investing and sourcing in the United States. With its analytic framework, links to public and private resources, and case studies, ACE is now available to help businesses assess total costs more accurately and enable informed decision-making.
7. https://citrb.commerce.gov – Department of Commerce IT Review Board
8. https://connection.commerce.gov – Intranet site
9. https://enterpriseservices.commerce.gov – Enterprise Services , Dept of Commerce website
10. https://medweek.mbda.gov
11. https://pass.commerce.gov - Intranet site which provides a single sign mechanism for all Department of Commerce websites
12. https://staff.commerce.gov – Staff Directory website
13. EDA.gov –Primary website for US Economic Development Administration

Past Performance Highlights:

- Achieved 100% staffing at contract start with both technical and administrative qualifications meeting contract requirements.
- Demonstrated exceptional responsiveness, managing all contract activities, coordinating programmatic matters, and providing leadership support.
- Recruited and retained incumbent staff, ensuring a smooth transition, with effective recruiting efforts when required.
- Provided comprehensive services, including IT Operations and Maintenance, full life cycle systems development, modernization, and migration of legacy systems.
- Met all schedules for deliverables, meetings, and service schedules without delays.
- Established a disciplined PMI Project Life-Cycle process, consistently meeting or exceeding on-time project delivery.
- Promptly identified and addressed post-production issues in a satisfactory and timely manner.
- Demonstrated exceptional delegation of authority and responsiveness.
- Consistently exceeded service level agreements through excellent customer service.

- Executed work with thoughtful planning and professional execution.

Agile Approach and Methodologies:

- Operated and iterated the environment with 2- and 4-week sprints, delivering both functionality and O&M bugs and fixes.
- Implemented Lean Governance for Agile (Scrum) and a Common Governance Model for IT Delivery.
- Ensured qualities were built into program management tools and processes through ITIL, automation, and Agile frameworks.

9. **Relevancy of Work**:

Teams Stealth's strategic collaboration with the Department of Commerce positions us as a leading provider of comprehensive IT solutions, distinguished by our focus on creating strategic plans to leverage cloud computing resources for optimizing digital services. Our expertise spans the entire life cycle of system development, modernization and maintenance, uniquely qualifying us to offer the Office of the Comptroller of the Currency innovative and impactful services.

In response to OCC's needs and requirements, our work with the DOC included the meticulous planning and execution of a strategic cloud migration roadmap. This involved the full life cycle support of websites using Drupal and PHP, aligning seamlessly with OCC's vision for modern, secure, and compliant platforms. Our approach ensures the continuity of operations while incorporating new features and security measures, illustrating our commitment to strategic cloud adoption.

In the domain of operation and maintenance services, we implemented robust DevSecOps practices during our engagement with the DOC, strategically aligning these efforts with DOC's operational requirements for high-security systems. Our strategic approach involves leveraging cloud-based solutions to enhance security measures, optimize deployment, and ensure efficient ongoing operations.

Our successful transition of DOC's custom-coded applications and data to cloud environments, embracing Software-as-a-Service (SaaS), Platform-as-a-Service (PaaS), and Infrastructure-as-a-Service (IaaS) solutions, highlights our strategic focus on migrating and managing systems securely in the cloud. Our expertise with platforms like AWS and the Acquia Cloud showcases our readiness to deploy similar strategic cloud strategies to benefit OCC.

The strategic integration of Salesforce services for the DOC underlines our proficiency in CRM platforms, critical for customer relationship management within the financial sector. This strategic experience positions us well to enhance OCC's stakeholder engagement and streamline internal processes through the strategic use of cloud-based technologies.

Our Agile approach, executed in Agile sprints, is strategically designed to ensure full transparency, and promote collaboration. This strategic methodology guarantees that OCC's systems are continuously improved with the latest regulatory and technology standards in mind, aligning with our commitment to strategic adaptability and responsiveness to evolving requirements.

The strategic implementation of Lean Governance and adherence to ITIL best practices during the DOC project ensures that OCC will benefit from our streamlined processes that are not only efficient but also aligned with regulatory standards. Our approach involves continuous improvement through strategic governance practices.

Our disciplined PMI Project Lifecycle process, highly effective in the DOC project, supports guarantees for on-time delivery of projects and services—an essential factor for the time-sensitive nature of operations at OCC. Our project management approach ensures the cloud-based solutions are delivered within stipulated timelines.

Our unwavering commitment to excellent customer service, exceeding service level agreements, and providing comprehensive support and training is aimed at ensuring OCC's solutions are not only technically sound but also strategically aligned with user-friendly and widely adopted practices.

The culmination of our engagement with the DOC has honed our skills and proven our capabilities in areas crucial to the OCC's mission. Our migration to modern, cloud-based solutions, integration of enterprise services, and operational support serve as tangible evidence of our readiness to strategically deliver similar results for the OCC.

2.2.3. Example 3 – National Telecommunications and Information Administration (NTIA)

Project Title – Web development Support Services for NTIA. **Contract Number – Task Order Number:** 47QTCB21D0018 / NTIA0000-22-00231	
1. Contractor Name: Stealth Solutions, Inc Role on Project: Prime	
2. Contractor Address:	3. Contract Type: T&M
4. Procuring Agency/Company Name: Department of Commerce - Enterprise Services, 1401 Constitution Ave, NW, HCHB Suite 200 Washington, DC, 20230, US	5. Agency/Company POC: Soma Chary (COR) schary@ntia.gov 202-482-5965.
6. Period of Performance: 09/01/2022 – 08/31/2027	7. Dollar Amount of Award: $3,420,896.55

8. **Description of Scope:**

The scope encompasses the development, maintenance, and administration of both web-based and desktop applications, as well as the provision of web services for NTIA customers. These applications include Employee Manager, Enterprise Business Applications, NTIA Document Tracking System, and various NTIA public websites. The websites supported by Team Stealth are as follows:

1. NTIA's primary public website (www.ntia.gov)
2. Broadband USA – a site that facilitates the BroadbandUSA program, promoting innovation and economic growth by expanding broadband access and meaningful use across the nation.
3. Broadband Technology Opportunities Program (BTOP) website (broadbandusa.ntia.doc.gov)
4. State Broadband Initiative public website (www2.ntia.doc.gov)
5. The Institute for Telecommunication Sciences (ITS) public website (https://www.its.bldrdoc.gov/)

6. Federal Government Spectrum Compendium public website (spectrum.gov)

The objective is to aid NTIA in migrating its website portfolio from on-premises to a cloud platform. Throughout this project, Team Stealth is tasked with fulfilling the following requirements for NTIA:

1. Enhancing and refining the user experience for existing sites.
2. Ensuring that NTIA's digital presence is mobile-friendly.
3. Ensuring compliance with federal standards and regulations, including Section 508 compliance and adherence to USWDS (United States Web Design Standards).

9. **Relevancy of Work**:

Our engagement with the National Telecommunications and Information Administration (NTIA) exemplifies Team Stealth's depth of expertise in managing, upgrading, and optimizing high-impact public facing websites for Office of the Comptroller of the Currency (OCC). Our role in advancing NTIA's digital infrastructure through strategic development and content management mirrors the strategic IT initiatives that are critical for the OCC's mission in ensuring a stable and secure financial system.

Comprehensive Management of Public Web Platforms:

- Strategic IT and Web Services: Our role within NTIA's Information Technology Division (ITD) and Business Application Management Branch (BAMB) involved strategic oversight and management of multiple high-impact public websites. This mirrors the OCC's need for strategic management of public-facing financial information platforms.
- Responsive Web Design and Compliance: We ensured that all NTIA websites were responsive and mobile-enabled, adhering to Section 508 compliance and conforming to the United States Web Design Standards (USWDS). This is particularly relevant to OCC's mandate to provide accessible and user-friendly digital resources to a diverse audience.

Expertise in Drupal Platforms:

- Advanced Drupal Solutions: For NTIA, we have been responsible for the development, Acquia migration, search.gov integration, and Drupal upgrades. This includes managing complex content and ensuring optimal website performance, directly aligning with OCC's need for robust and secure content management for regulatory information dissemination.
- Comprehensive Content Management: Our work in maintaining and updating critical content for NTIA showcases our ability to handle complex data, a crucial aspect for OCC's extensive data on financial institutions and policies.
- Drupal 7/8/9/10 Expertise: Our work with NTIA included enhancing and completing existing Drupal themes for deployment. Given OCC's requirement for a secure and modern web presence, our Drupal expertise ensures a seamless experience for users while maintaining high security and performance standards.
- UI/UX Design and Accessibility: We extended NTIA's style guides and developed new UI components, ensuring a user-centric design approach. This focus on usability and accessibility is critical for OCC websites that serve as a hub for financial information and services.

Broadband and Infrastructure Expertise:

- Internetforall and BroadbandUSA Initiatives: Our efforts in redesigning and developing platforms like Internetforall.gov and BroadbandUSA.ntia.doc.gov reflect our capability to support initiatives that require extensive outreach and information sharing, relevant to **OCC's community development financial institutions and expanding financial access.**

- 5G Challenge: Maintenance of the 5G Challenge website underscores our capacity to manage platforms central to national infrastructure projects, **analogous to the OCC's involvement in critical financial infrastructure and cybersecurity.**

Security and Compliance:

- C-SCRIP Program: Our work with the C-SCRIP program demonstrates our commitment to security and risk information sharing, aligning with OCC's focus on risk management for national banking systems.
- USPREPS for Public Safety: Maintaining the USPREPS.ntia.gov site for public safety broadband network planning showcases our expertise in handling websites that require coordination with state and federal entities, similar to OCC's coordination with various regulatory bodies.

Compliance with Standards and Best Practices:

- Section 508 and WCAG 2.0 AA Compliance: Our commitment to ensuring all NTIA websites met accessibility standards reflects our capability to help the OCC meet these essential requirements, ensuring that all users, regardless of ability, have equal access to services and information.
- Adherence to Federal IT Policies: The administration of web-based and desktop applications for NTIA demanded strict adherence to IT policies, procedures, and standards. This experience is directly applicable to OCC's requirement for compliance with federal IT regulations and policies.

Agile Methodologies and Efficient Project Management:

- Requirements Gathering and Team Coordination: For NTIA, we effectively gathered and coordinated requirements, schedules, and activities, contributing to high-performing team meetings. This aligns with OCC's need for meticulous project management and coordination among various stakeholders.
- Communication Excellence: Our demonstrated verbal and written communication skills, crucial for explaining complex IT tasks to non-technical stakeholders, will be invaluable in managing OCC's digital initiatives and ensuring all parties are aligned and informed.
- Responsive and Agile Operations: Our agile approach in maintaining NTIA's suite of websites ensures that we are responsive to new developments and user needs, reflecting our capacity to adapt to the dynamic financial ecosystem that OCC operates within.

Our successful partnership with NTIA stands as a testament to Team Stealth's ability to deliver sophisticated digital solutions that enhance accessibility, ensure security, and foster economic growth. We are poised to leverage this experience to meet OCC's strategic goals, providing a seamless, secure, and dynamic digital presence that supports your mission to ensure the stability of the financial system.

3. Factor 3: Technical Approach:

Team Stealth provides our technical approach for the replacement of OCC's current on-premises solutions with our cloud-based solution by Acquia. This recommendation is based upon our full analysis of OCC's current environment and the technical and business needs, including the full migration of the existing seven sites to our modern cloud-based environment. Our solution architecture and approach are highlighted through the use of several diagrams with full explanations throughout this section.

3.1. OCC Digital Landscape - Current State Analysis

The Office of the Comptroller of the Currency (OCC) currently operates a multifaceted Content Management System (CMS) infrastructure that serves as the backbone for its diverse array of digital services. The existing system hinges on the legacy Percussion Rhythmyx CMS, which has been tailored over the years to meet the evolving needs of the agency. At the core of this infrastructure are six web publishers and six administrators, supported by thirteen testers and content specialists. These roles are pivotal in managing and publishing content across various platforms, ensuring that information is both accurate and accessible.

The current CMS plays a critical role in integrating a wide range of technologies that facilitate both static and dynamic content delivery. Static content is predominantly seen in the informational sections of OCC.gov and Careers at the OCC, whereas dynamic content is managed through custom applications like the newsroom on OCC.gov, which allows for real-time searching and filtering of news and issuances. Technologies such as Google Programmable Search and Lucidworks Fusion Search provide sophisticated site-wide and special collection search capabilities, crucial for the efficient retrieval of content by the public and internal users.

APIs from USAJOBS integrate with Careers at the OCC to pull current job listings, while BankNet leverages multi-factor authentication via OKTA to secure access to applications for bankers. The Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA) website, although not containing a search function, forms part of the digital landscape managed by the OCC, showing the breadth of content managed under the CMS umbrella.

The technological ecosystem of the current CMS includes interfacing with .Net / Microsoft SQL for custom search tools, API management for data exchanges, and integration with third-party services such as GovDelivery/Granicus for email broadcasting. The current CMS architecture also accommodates a range of additional tools and services, including Google Analytics, Siteimprove, and CrazyEgg, which contribute to the site metrics, quality assurance, and user experience insights that drive continuous improvement.

In summary, the OCC's existing CMS is a complex and integral framework that supports a vast array of services and user interactions. It underpins the agency's ability to deliver content effectively to a wide audience, including the public, the banking community, and internal stakeholders. The migration to a cloud-based solution like Acquia Drupal represents an

opportunity to modernize this infrastructure, enhance functionality, and maintain the high standards required for federal digital services.

3.2. Proposed Solution - Acquia's Drupal CMS Platform-as-a-Service (PaaS)

As the Office of the Controller of the Currency (OCC) embarks on a strategic initiative to modernize its digital infrastructure, the requirements for a robust, secure, and versatile content management system (CMS) are paramount. The proposed solution involves transitioning the OCC's on-premises CMS to the Acquia cloud-based Drupal solution. This migration aligns with the OCC's vision to leverage the flexibility, scalability, and innovation that cloud technology offers, enhancing the management and delivery of digital content across its seven primary websites and services.

Drupal, an open-source content management system (CMS), is renowned for its robust and versatile framework that supports a vast array of websites and applications, particularly in government and regulated industries. Its ecosystem is a rich amalgamation of core functionalities and modular extensions, contributed by a global community of developers. This ecosystem includes themes for customizable appearances, modules for extended capabilities, and distributions that offer tailor-made packages for specific industry needs. The continuous innovation within the Drupal community results in a platform that is both flexible and secure, capable of adapting to the ever-evolving digital landscape.

In essence, the Acquia Platform PaaS cloud environment, coupled with Drupal WCMS, not only meets but surpasses the CMS replacement requirements and future needs as outlined in Appendix A. This solution offers key advantages such as a vibrant open-source community and code, a flexible architecture, seamless integrations, scalability, and robust security measures. With backing from over 10,000 active community contributors, 46,000 integration extensions, and 45,000 prebuilt modules—including Google Analytics, Google Search, SiteImprove, Search API, Social Feed, Chatbot API, and more—it effortlessly addresses a wide range of requirements related to function sets like auditing, security, authoring, blogging, calendar management, content validation, content relationships, dashboards, data integrity, disaster recovery, document management, email, personalization, search, SEO, and others detailed in Appendix A.

Acquia's Drupal CMS solution has gained widespread adoption across various government levels, with notable implementations at the **US Department of Treasury**, IRS.gov, Department of Justice, US Department of Transportation, US Department of Energy, US Department of Commerce, Health and Human Services, GSA, and the Social Security Administration.

3.3. Acquia Platform-as-a-Service (PaaS) Key Functionality

The Acquia Platform-as-a-Service (PaaS) solution is strategically designed for resilience, utilizing Amazon Web Services (AWS) infrastructure with data center support for major geographic regions and availability zones. The Acquia PaaS architecture aims to expedite deployment, simplify application management, and lower operational costs. Key features of the Acquia PaaS solution include:

- A fully managed, high-performance Drupal-tuned platform stack.
- An automated development workflow with site health and monitoring tools.
- A highly available, scalable, and secure infrastructure.
- 24x7 monitoring supported by an experienced Drupal support team.
- Separate development, staging, and production environments, promoting continuous delivery with a built-in activity log for auditing.
- **Uptime** commitment of **99.95 percent** for both the platform and infrastructure.
- **Security** measures embedded at every layer, encompassing firewalls, IP-based restrictions, whitelisting IP addresses, continuous monitoring, vulnerability scans, penetration testing, role-based access, and multi-step authentication.
- Compliance with SOC 1, SOC 2 Type, PCI-DSS, **FedRamp** certified, EU Data Privacy, etc.
- **Enterprise-grade Apache Solr Search** for high-performance search with faceted results and content recommendations.
- **Acquia Edge, a top-tier Content Delivery Network (CDN)** and Web Application Firewall, mitigating the risk of unexpected traffic, enhancing speed, and minimizing the impact of bots and malicious actors.
- **Acquia Cloud Site Factory**, a unified platform standardizing technology and processes for building, provisioning, and maintaining multiple websites, facilitating faster and cost-effective site management while ensuring brand consistency.
- SAML-based Single Sign-On (SSO) login via an Identity Provider (IDP).
- **Disaster Recovery** integrated into Acquia Cloud, creating hourly snapshots of all data retained on a diminishing schedule for three months.
- **Pipelines/CICD**, a continuous delivery tool automating development workflows for applications hosted by the Cloud Platform.

3.4. Acquia Cloud Platform Architecture

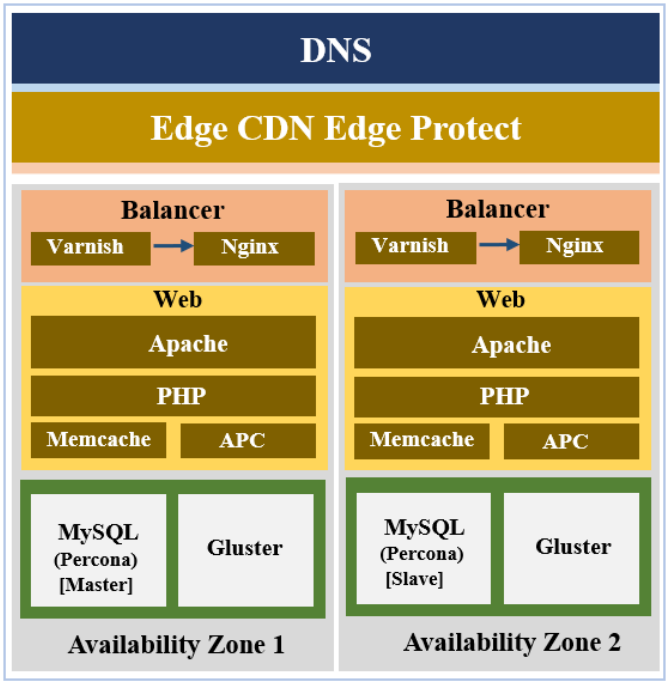
The Acquia Cloud has been specifically designed to optimize the performance, security, and scalability of Drupal CMS. It offers a comprehensive set of tools aimed at simplifying the development, deployment, and management of Drupal applications. These capabilities include:

- **Automated Workflow**: The platform provides tools for integrating code, conducting testing, and deploying updates, streamlining the development process.
- **Enhanced Security**: With robust security features such as automated backups, disaster recovery, and enterprise-grade SLAs, Acquia Cloud ensures the safety of your Drupal applications.
- **Performance Tuning**: Advanced caching mechanisms and performance optimization techniques guarantee high responsiveness even during peak usage periods.
- **Scalability**: Acquia Cloud's infrastructure effortlessly scales to accommodate increasing demand without compromising performance.
- **Compliance with Federal Security Standards**: Acquia's platform is engineered to adhere to federal security standards, holding a FedRAMP Moderate Authorization to Operate (ATO).
- **Compatibility with a Diverse Technology Stack**: Acquia Cloud and Drupal are highly compatible with a wide range of technologies, including .Net applications, Microsoft SQL

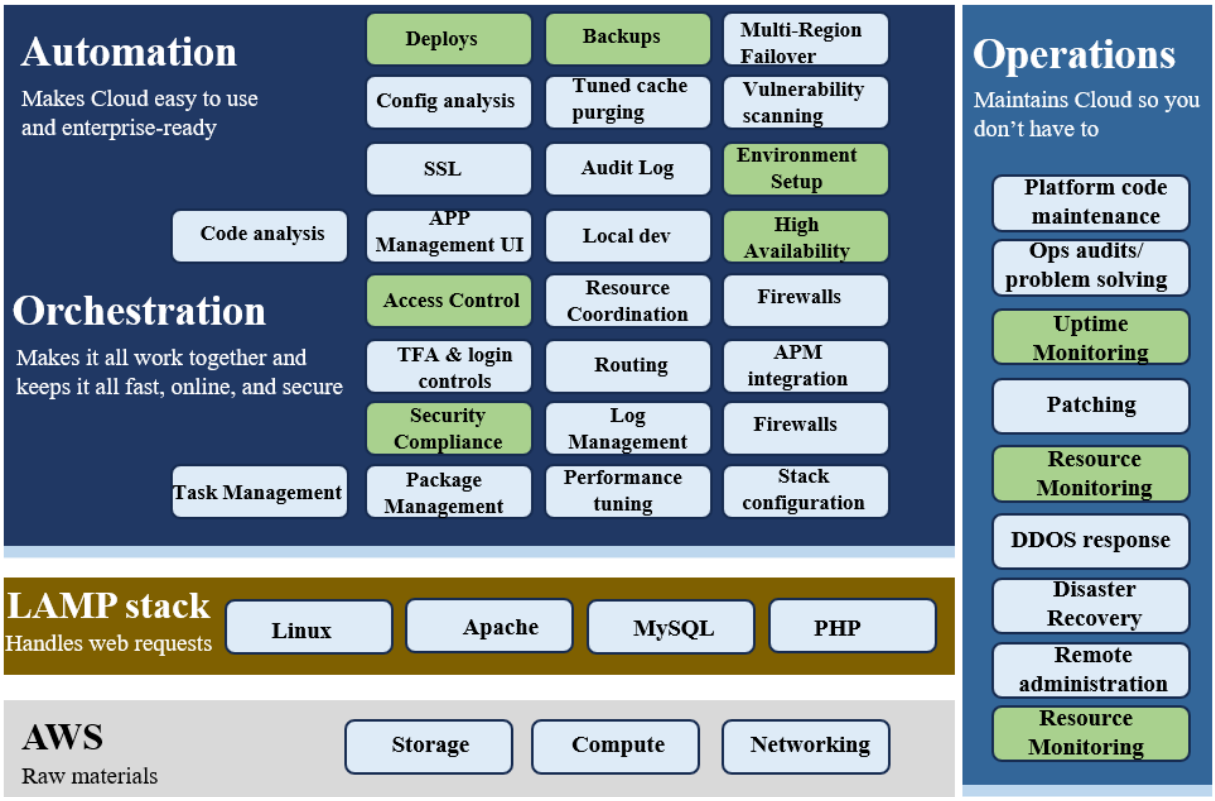
databases, and various APIs. This compatibility facilitates smooth integration with existing systems and workflows, without requiring a complete overhaul. This interoperability is particularly crucial for government entities with diverse technology investments seeking a CMS that seamlessly integrates with their established tech stack.

The core of the Acquia Cloud platform is an open-source LAMP server stack, combining the Linux (Ubuntu) operating system and PHP programming language with Drupal. The platform is pre-configured with components depicted in the diagram below:

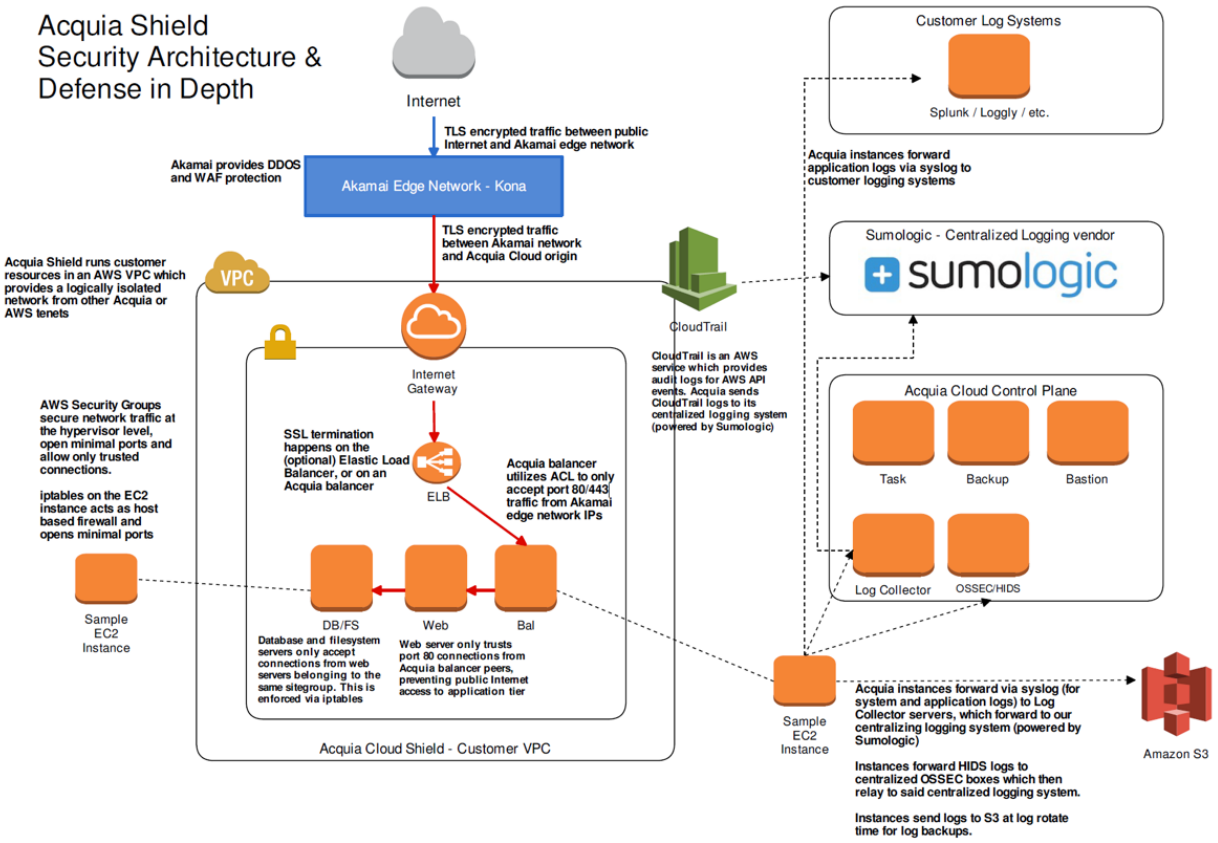
- **DNS:** Domain Management portion of the Cloud UI to configure and oversee domains.
- **Web server:** Apache optimally serves media and Drupal page views.
- **File system:** A highly performant POSIX file system for file uploads
- **Database:** Percona's optimized MySQL server with Drupal-optimized MySQL configurations
- **Caching**: Varnish and Memcache in front of all traffic to speed up sites.
- **Balancer**: Nginx to optimize resource utilization.
- **Edge Content Delivery Network (CDN)**: A customizable global network accelerates app delivery, reaching 95% of internet users. It mitigates traffic risks, boosts speed, and minimizes impacts from bots and malicious actors.



The diagram below illustrates the technology stack and various modules of the Acquia Cloud Platform, streamlining website development, deployment, monitoring, maintenance, and auditing for enhanced efficiency.



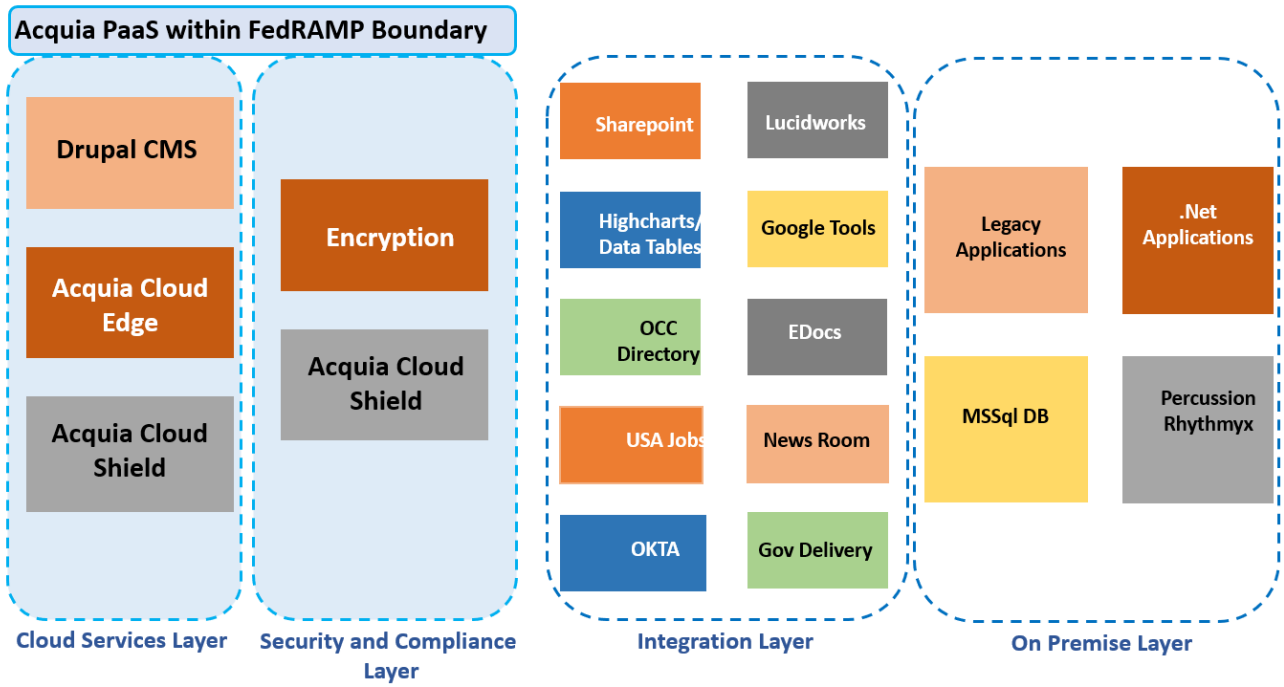
The diagram below reflects the Acquia Shield Security Architecture.



3.5. Acquia Cloud Platform Setup for OCC

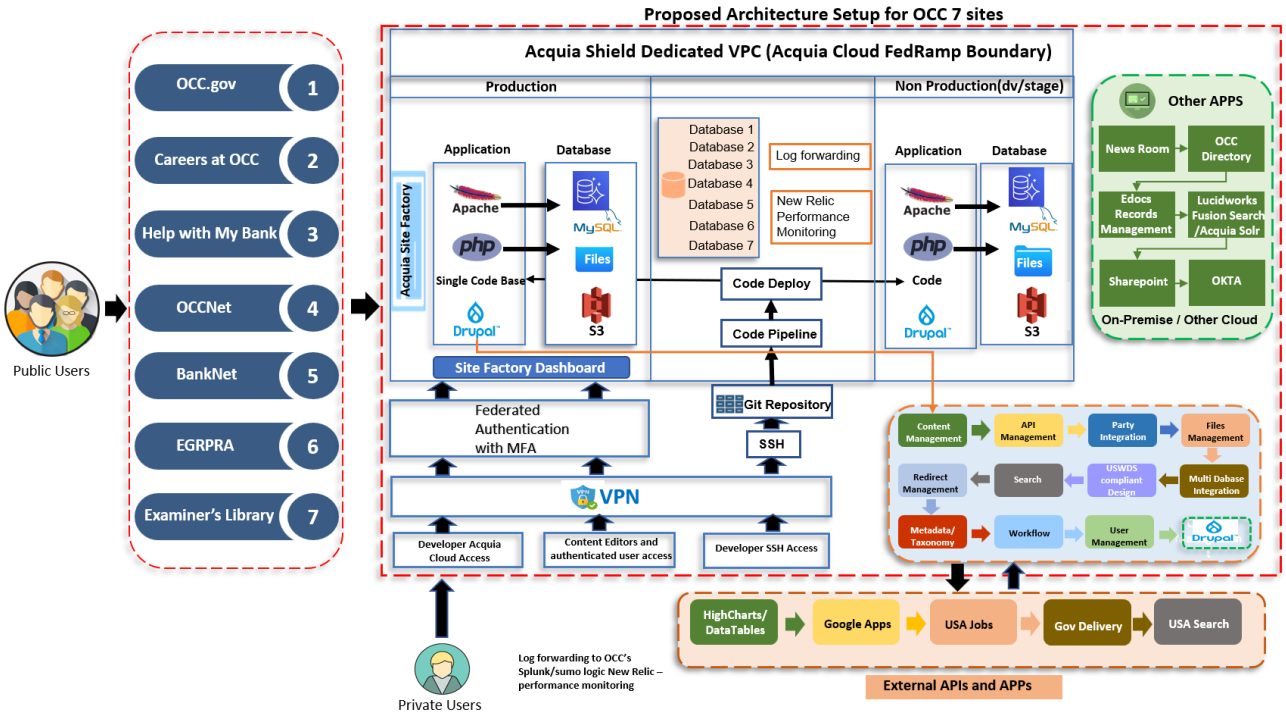
Below are two architecture diagrams proposed by Stealth, outlining the configuration of the Acquia PaaS solution for OCC. This setup seamlessly integrates with OCC's existing technology stack.

The below diagram delineates the architecture layers, highlighting components and distinguishing between those within the Acquia Cloud FedRamp boundary and those components that are on-premises.



The four above architectural layers are further outlined below:

1. **Cloud Services Layer** (Acquia PaaS within Acquia FedRAMP Boundary)
   - Drupal CMS: Core of the content management, hosted on Acquia Cloud.
   - Acquia Cloud Edge: Enhances security with DDoS protection and CDN services.
   - Acquia Cloud Shield: Provides a virtual private cloud with VPN capabilities for secure access.
2. **Security and Compliance Layer**
   - Identity Management: Integration with existing IAM solutions like OKTA for multi-factor authentication.
   - Data Encryption: At-rest and in-transit encryption for all data within the Acquia PaaS FedRAMP boundary.
3. **Integration Layer**
   - API Management: Interfaces for connecting Drupal with OCC's existing services like USAJOBS, SharePoint, and custom search applications.
   - Lucidworks Fusion: Integrated via API for internal site searches.
   - GovDelivery/Granicus: For email communication and subscriptions, integrated through Drupal modules.
4. **On-Premises Layer** (Outside Acquia PaaS FedRAMP Boundary)
   - Existing OCC On-Premises Technologies: Legacy applications, .Net applications, Microsoft SQL databases, and APIs.
   - Legacy CMS (Percussion Rhythmyx): Temporarily interfaced with Acquia Drupal for content migration.



The above diagram is an architectural overview of the Office of the Comptroller of the Currency (OCC) proposed network infrastructure, focusing on the proposed Drupal-based web ecosystem hosted on Acquia Cloud, along with other applications and services. A single codebase with a multi-site approach will be implemented in support of all seven sites.

The OCC network will be segmented into two main areas: the OCC internal network and the Acquia Cloud environment, with additional connectivity to external APIs and applications.

OCC Internal Network:
This network includes various Drupal sites such as OCC.gov, Careers at OCC, Help with My Bank, OCCNet, BankNet, EGRPRA, and Examiner's Library. It serves both public users and private users, with a gateway managing the traffic between the internet and the internal network.

Other Applications:

- Newsroom
- OCC Directory
- eDocs Records Management
- Lucidworks Fusion Search/Solr for advanced search capabilities
- SharePoint
- OKTA for identity management

Acquia Cloud Environment:
FedRAMP Certified Acquia Shield Dedicated VPC (Virtual Private Cloud): This is a secured cloud hosting environment for the OCC's Drupal applications. It consists of two segments,

Production and Non-Production (development/stage), each with its own set of resources such as applications, databases, file storage, and Drupal codebase.

Production:

- Runs on Apache and PHP.
- Utilizes Amazon Aurora MySQL for database services.
- Employs Amazon S3 for file storage.
- Federated Authentication with Multi-Factor Authentication (MFA) is in place for enhanced security.
- The code is managed and deployed through a code pipeline and Git repository, with secure shell (SSH) access.

Non-Production:

- Mirrors the production environment but is used for development and staging purposes.
- Allows for code deployment and testing before going live.

External APIs and Applications:

This area indicates connectivity to external services such as:

- USA Jobs
- Gov Delivery
- USA Search
- Various other government-related APIs and services

General Capabilities:

The diagram also shows various functionalities and services provided within the Drupal ecosystem such as:

- Content Management
- Metadata/Taxonomy management
- Workflow processes
- User Management
- API Management
- Third-party integration
- Search functionality compliant with USA Web Design Standards (USWDS)
- File Management
- Implementation of HighCharts/DataTables for data representation

Connectivity:

- Users connect to the OCC network and applications via a gateway, and there is a VPN setup for secure developer access to the Acquia Cloud environment.
- Developers have specific access to the Acquia Cloud, and content editors have authenticated user access, with both accessing through Federated Authentication with MFA.

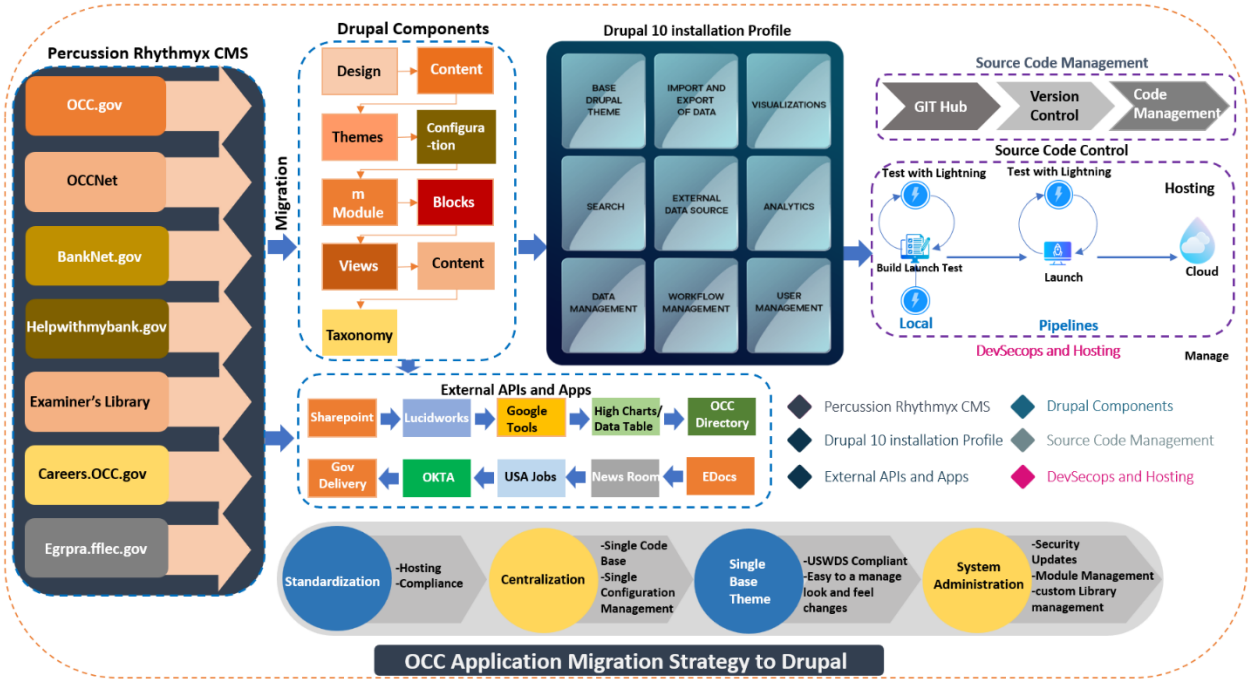
The architecture is designed to support a secure, scalable, and manageable web presence for the OCC, leveraging the Acquia Cloud platform's capabilities for hosting Drupal applications, ensuring compliance with federal security standards, and integrating seamlessly with other government services and tools.

The proposed solution architecture embodies a comprehensive approach, ensuring that Acquia Drupal serves as a robust, secure, and compliant CMS aligned with OCC's digital transformation

goals. Stealth has previously employed a similar approach with NTIA.gov and successfully migrated it from on-premises to the Acquia Cloud Platform as described in example 3.

3.6. Team Stealth Migration Approach

The diagram presented below offers a succinct view into the components and procedures integral to Team Stealth's migration strategy for the OCC applications. Moving from diverse non-Drupal systems (Percussion Rhythmyx) and older Drupal versions like Drupal 7 to the latest Drupal 10 demands meticulous planning, exhaustive analysis, and exacting execution. Below we elaborate on our established eleven-step process, outlining the crucial considerations inherent in such a migration endeavor to ensure integrity, security, and functionality of content across all OCC applications.



1. Inventory and Analysis:
   - Conduct a comprehensive inventory of current applications.
   - Evaluate functionality, content types, user roles, modules, and themes in existing systems.
   - Document custom code, third-party integrations, and unique features or workflows.
2. Requirements Gathering:
   - Collect business, technical, and content requirements for the new Drupal 10 site.
   - Define data transformation requirements.
   - Engage stakeholders to understand desired outcomes and any desired enhancements.
3. Migration Planning:
   - Develop a detailed migration plan outlining processes, timelines, required resources, and tools.
   - Select a migration approach (big bang or incremental) based on complexity and business needs.

4. Environment Setup:
   - Establish a development environment for Drupal 10.
   - Configure version control and set up development, testing, and production environments.
5. Content Migration:
   - Utilize Drupal's Migrate API for content migration.
   - Develop custom migration paths for non-Drupal applications using migration modules or scripts.
   - Pilot Migration: Conduct a pilot migration for a subset of content to validate the migration process and address any issues.
   - Full-scale Migration: Execute the migration for all content, prioritizing content based on complexity and dependency.
6. Functionality Transfer:
   - Design architecture for scalability to accommodate increased traffic and content.
   - Identify and install Drupal 10 modules to replicate functionality from non-Drupal systems.
   - Develop custom modules or modify existing ones to meet specific requirements.
   - Ensure forward compatibility of custom code and configurations with future Drupal releases.
   - Adhere to Drupal security best practices, including regular updates and secure coding standards.
   - Maintain SEO rankings through URL structure preservation and redirects where applicable.
7. Theme and Design:
   - Redesign the theme for Drupal 10, ensuring responsiveness and adherence to modern web standards.
   - Employ a base theme or create a custom one to align with organizational branding.
   - Ensure compliance with WCAG 2.1 accessibility guidelines.
8. Quality Assurance:
   - Conduct comprehensive testing, including functional, security, performance, and user acceptance testing.
   - Verify accurate data migration and proper functionality.
9. Training and Documentation:
   - Train content editors, site administrators, and IT staff on the new Drupal 10 platform.
   - Update or create documentation covering site architecture, functionality, and maintenance.
10. Launch and Monitoring:
    - Execute a launch strategy, potentially phased, for the new site.
    - Monitor the site post-launch for issues, performance, and security vulnerabilities.
11. Continuous Improvement:
    - Solicit feedback from users and stakeholders.
    - Plan ongoing updates and enhancements.

3.7. Application Specific Migration Tactics:

Upon Team Stealth's establishment of the Acquia Cloud Platform with Drupal CMS, we recommend the following site/application specific migration tactics.

1. OCC.gov (Including Custom Search Products and GovDelivery):
   - Migrate static content to Drupal nodes with appropriate content types and taxonomies.
   - Re-develop custom search applications in Drupal using the Search API module, interfacing with Google Programmable Search for indexing and searching.
   - Utilize Drupal's email management modules to integrate and manage subscriptions and broadcasts for the GovDelivery email broadcast service.
2. Careers at the OCC:
   - Migrate static content to Drupal while maintaining URL structures for SEO preservation.
   - Develop a custom Drupal module to manage job listings pulled from USAJOBS via API, ensuring real-time updates.
3. Help with My Bank (Including CAMP):
   - Migrate static pages to Drupal, with a custom module developed for the CAMP application to handle complaint filings and securely transfer data to the OCC's case management system.
   - Ensure the module replicates CAMP functionality and integrates seamlessly with Help with My Bank's design.
4. OCCNet:
   - Migrate static pages to Drupal content types.
   - Develop Drupal modules to fetch dynamic content from SharePoint or external APIs.
   - Integrate Lucidworks Fusion Search with Drupal using the Search API module for internal site searches.
5. BankNet:
   - Configure Drupal's file management system to securely serve static XML, JSON, HTML, CSS, and content files for the secure portal.
   - Integrate Drupal with OKTA for multi-factor authentication, leveraging Drupal's user management and security modules.
6. EGRPRA:
   - Focus on content migration to Drupal while ensuring structure and content integrity.
   - Prepare for future integration of search functionalities as needed.
7. Examiner's Library:
   - Migrate content to Drupal and integrate Lucidworks Fusion Search for site-wide and special collection searches.
   - Develop a strategy for managing large volumes of document-type content, potentially utilizing Drupal's Media and File Entity modules.

Migrations are known for their complexity, yet with Team Stealth's extensive expertise and proven track record in meticulous planning and refined execution, the process can be navigated with confidence. Drawing from our past experiences, Team Stealth ensures that every aspect of the migration is carefully considered and executed to perfection. This approach not only

improves user experience but also enhances content management efficiency and establishes a secure foundation for future digital initiatives. With Team Stealth at the helm, the migration journey becomes an opportunity for transformation, paving the way for seamless integration and optimized performance in line with the organization's digital roadmap.

3.8. Technical Considerations for Migration

This section addresses the technical aspects crucial for migrating OCC sites. It delves into the specifics of integrating Acquia Drupal with additional technologies such as Google Analytics, Siteimprove, and CrazyEgg. Moreover, it outlines strategies for ensuring the seamless continuation of services, such as OCC.gov's newsroom, search functionalities, and GovDelivery.

1. **Content Types Migration**: Migrate simple content types first, such as basic pages and news articles and then progress to more complex content types with custom fields and entities.
2. **Managing Complex and Customized Content**: Complex and customized content will be managed through a combination of Drupal's core features, contributed modules, and custom module development. This includes:
   - Utilizing the Migrate API in Drupal to handle the transformation and import of complex data structures.
   - Developing custom content types in Drupal to mirror the structure and functionality of complex Rhythmyx content.
   - Creating custom modules for unique application logic, ensuring continuity of specialized functionalities such as enforcement action searches and the OCC Directory.
   - Employing Drupal's Layout Builder and other theming tools to recreate custom layouts and interactive elements.
   - Utilizing Drupal's Configuration Management system to track and deploy configuration changes across environments.
3. **User Roles Transition**: Define a mapping of current user roles to the new Drupal roles, and gradually transition users to the new system with corresponding permissions.
4. **Custom Applications Transition**: Identify dependencies and plan the migration of custom applications. Develop Drupal equivalents or integrate existing applications through APIs.
5. **Integration with Additional Technologies**: Acquia Drupal's flexible architecture and extensive API capabilities make it the ideal platform for integrating the wide array of technologies currently in use at OCC. The strategic approach below supports maintaining and enhancing the functionality and user experience of OCC's digital services while transitioning to a more modern and robust CMS platform.
   - **Integration with OCC.gov Newsroom and Preview Sites:** Acquia Drupal will be integrated to support the OCC.gov Newsroom's functionality by utilizing Drupal's robust API framework. The content published on Drupal can be made accessible to the newsroom application via RESTful APIs, which will allow for dynamic searching and filtering of news and issuances. For preview sites, Drupal's multi-site capability will be leveraged, creating an environment where updates are staged for review by content submitters before being pushed to production. These preview instances will be

configured to be accessible only within OCC's secure network, ensuring compliance with internal access controls.

- **Google Programmable Search and Lucidworks Fusion Search Integration:** Acquia Drupal's search API will facilitate integration with Google Programmable Search, ensuring that public-facing content is indexed correctly and is searchable via Google's service. For internal searches, Drupal will be configured to interact with Lucidworks Fusion Search. Drupal will publish content to be indexed by Fusion and return search results via Fusion's API, which is tailored for content originating from OCC's Drupal-managed sites.
- **Integration with GovDelivery/Granicus and Analytics Services:** Drupal's modular structure will support integration with GovDelivery/Granicus, using modules to connect to the email communication service. This will allow for seamless delivery of email-ready content, including HTML, images, and CSS for news and issuances. Additionally, Drupal will be configured to work with Google Analytics and Siteimprove for comprehensive site metrics and quality assurance, and CrazyEgg for heatmap analytics, ensuring a data-driven approach to content and user experience management.
- **.Net/Microsoft SQL/API and Custom Search Tools**: For custom search tools and data management applications like CRA Search and Institution Search, Drupal will interact with existing .Net applications and Microsoft SQL databases via custom APIs. This ensures that the data management and search functionalities of these tools remain robust and efficient in the public domain, while internal tools remain secure and integrated within OCC's network.
- **SharePoint Online, WTTA, and RMS Integration:** SharePoint Online integration will be maintained to provide real-time IT release and outage information on OCCNet, ensuring that ITS can promptly update the site during emergencies. The Web Ticketing and Tracking Application (WTTA), based on Appian, will remain a crucial part of the content lifecycle, with Drupal publishing topics and metadata directly to WTTA. The integration will be designed to preserve existing metadata fields and workflows.

6. **Interface Design with U.S. Web Design Systems and Display Technologies**: Acquia Drupal will incorporate the U.S. Web Design Systems (USWDS) principles for interface design, ensuring a uniform and accessible user experience across all platforms. For the display of tabular data and charts, Drupal will integrate with technologies like DataTables.net and Highcharts, providing interactive and responsive data presentations. Google Maps integration will be used for visualizing mapped information, enhancing user engagement.
7. **File Replication, Site Translation, and Records Management**: File replication between the CMS and website servers, including for disaster recovery, will be achieved using Drupal's file management capabilities, potentially augmented by SureSync or similar technologies. Site translation functions, such as those provided by Google Translate, will be included to ensure accessibility for non-English speakers. For records management, Drupal will interface with eDocs, utilizing scheduled tasks to publish new and updated files or webpages nightly, along with the necessary metadata for record identification.

8. **Redirect management**: the current RMS will be initially maintained, with Drupal providing the necessary interface to manage redirects and vanity URLs. A plan will be developed to transition this functionality into Drupal, aiming to decommission RMS post-migration, streamlining the redirect management within the CMS environment.

3.9. Implementation Plan

The migration of OCC's CMS to Acquia Drupal will be conducted following an Agile methodology, emphasizing iterative development, collaboration, and flexibility. This approach is well-suited to OCC's requirements, given its adaptability and focus on incorporating user feedback, aligning with OCC's preference to migrate the seven sites iteratively. Continuous collaboration with OCC stakeholders is vital throughout the migration process to ensure that both content and functionality align with the agency's needs. Regular reviews and iterations, inherent to the Agile process, will enable adjustments based on feedback and testing outcomes. The objective is to achieve a smooth transition with minimal disruption to OCC's operations and user experience. The implementation will proceed through the following five phases:

1. Design Phase:
   - Requirements Gathering: Collaborate with OCC stakeholders to refine requirements for the Drupal CMS.
   - Architecture Design: Develop a comprehensive system architecture addressing integration with OCC's existing technologies.
   - UX/UI Prototyping: Create wireframes and prototypes to establish the new CMS's look and feel.
2. Configuration Phase:
   - Environment Setup: Configure development, staging, and production environments within Acquia Cloud.
   - Module Selection: Choose Drupal modules meeting functional requirements and complying with security standards.
   - Custom Development: Initiate development on custom modules required for unique OCC functionalities.
3. Implementation Phase:
   - Content Structure: Define content types, taxonomies, and views in Drupal to mirror OCC's content architecture.
   - User Roles and Permissions: Configure user roles and permissions to reflect various user interactions with the CMS.
4. Testing Phase:
   - Unit Testing: Conduct unit tests for custom modules and integrations.
   - System Testing: Perform comprehensive tests to ensure all components work together as expected.
   - Security Testing: Execute rigorous security tests to meet FedRAMP Moderate requirements.
   - User Acceptance Testing (UAT): Involve OCC stakeholders in testing the system using real-world scenarios.

5. Deployment Phase:
   - Content Migration: Transfer content from the legacy CMS to the new Drupal system.
   - Training: Provide training to OCC staff on the new CMS functionalities and workflows.
   - Go-Live: Transition the CMS to the production environment and launch.
   - Post-Deployment Support: Offer ongoing support to address any issues and refine the system based on user feedback.

The Implementation Phase 3 is further delineated into specific steps to ensure a systematic approach as follows:

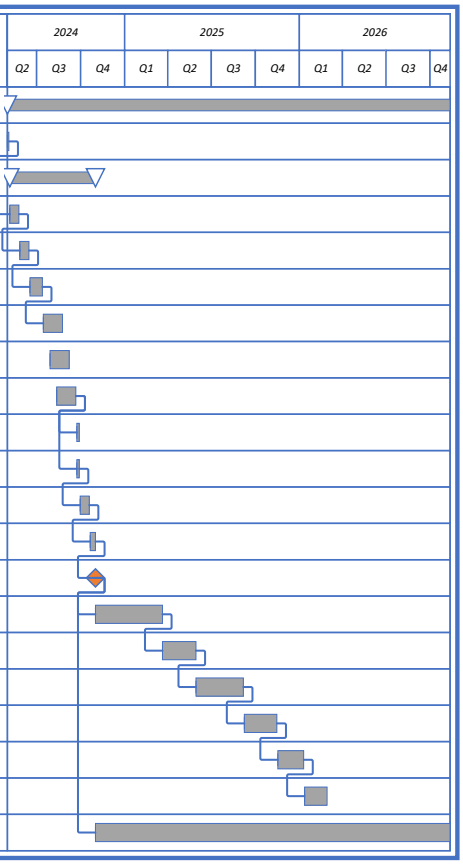
1. Acquia Cloud Environment Setup:
   - Establish separate development, staging, and production environments within Acquia Cloud.
   - Configure backup and recovery processes to safeguard data integrity.
2. Drupal Customization:
   - Install and configure selected Drupal modules tailored to meet OCC's requirements.
   - Develop custom modules and themes to address specific needs unique to OCC's digital ecosystem.
3. Content Migration:
   - Conduct a pilot migration with a subset of content to refine the migration process and address any potential issues.
   - Execute a full-scale migration, closely monitored, and adjusted as necessary to ensure the smooth transition of all data and content.

This implementation plan serves as a strategic roadmap for migrating OCC's CMS to Acquia Drupal, encompassing all essential stages and considerations to facilitate a successful transition. It underscores Team Stealth's comprehensive understanding of OCC's unique requirements, informed by prior migration experiences, team expertise, and the robust technical capabilities of Acquia Drupal.

3.10. High-Level Timeline with Dependencies and Key Milestones

The national timeline commencing on May 1, 2024, is structured to adhere to OCC's preference for a sequential migration of sites. The proposed sequence begins with simpler sites, with flexibility for adjustments based on OCC's feedback and dependencies identified during planning. According to the proposed schedule, OCCNet is prioritized for migration by November 1, 2024, while Examiner’s Library is targeted by February 27, 2026. Task #6, "Setup Drupal Multisite Environment," is conducted initially and applies to all sites, while tasks 4 to 13 are repeated for each site. Operations and Maintenance commence once the first site is live and continue until the end of the performance period on April 30, 2029. The Gantt chart provided below illustrates the critical milestones.

ID	Task Name	Start	Finish
1	**OCC Sites PaaS Migration**	**5/1/2024**	**4/30/2029**
2	Project Kickoff	5/1/2024	5/3/2024
3	**Site 1 - OCCNet Migration**	**5/6/2024**	**10/31/2024**
4	Project Planning and Requirements Gathering	5/6/2024	5/24/2024
5	Technical Assessment	5/27/2024	6/14/2024
6	Setup Drupal Multisite Environment	6/17/2024	7/12/2024
7	Design and Theming	7/15/2024	8/23/2024
8	Functionality Migration	7/29/2024	9/6/2024
9	Content Migration	8/12/2024	9/20/2024
10	User and Permissions Migration	9/23/2024	9/27/2024
11	SEO and Redirects	9/23/2024	9/27/2024
12	Testing and Fixes	9/30/2024	10/18/2024
13	Training and Launch	10/21/2024	10/31/2024
14	Site 1 - OCCNet Migrated	11/1/2024	11/1/2024
15	Site 2 - OCC.gov Migration	11/1/2024	3/20/2025
16	Site 3 - Careers at the OCC Migration	3/21/2025	5/29/2025
17	Site 4 - Help with My Bank at the OCC Migration	5/30/2025	9/5/2025
18	Site 5 - BankNet Migration	9/8/2025	11/14/2025
19	Site 6 - EGRPRA Migration	11/17/2025	1/9/2026
20	Site 7 - Examiner's Library Migration	1/12/2026	2/27/2026
21	Operations and Maintenance Support	11/13/2024	4/30/2029



3.11. Dependencies

- Timely onboarding and clearance of resources are crucial for meeting the proposed timeline.
- Dependencies exist on the Information System Security Officer (ISSO) and the Security Assessment and Authorization (SA&A) assessor to complete their activities within the proposed timeline. Security-related tasks are more intensive during the initial site migration but are expected to decrease with subsequent releases.
- Drupal Version Compatibility: Changes in Drupal versions during migration may necessitate accounting for Drupal upgrades that could impact the timeline.
- Third-Party Services and Integrations: Applications may be integrated with third-party services, APIs, or custom code with specific hosting or environment requirements. Ensuring appropriate support for third-party services is vital for smooth integration.
- Data Quality and Migration Complexity: The quality of data and the ability to transition old structures into new ones could add complexity and affect the migration timeline.
- Stakeholder Alignment: Obtaining and maintaining alignment among stakeholders on goals, expectations, timelines, and resource commitments for the migration is crucial.

- Successful Change Management: Effective management of organizational change, including communication plans, user training, and adaptation to new workflows or processes, is essential for successful migration.
- Compliance and Legal Requirements: Ensuring that the migration and the new hosting environment comply with legal, regulatory, and policy requirements relevant to the organization.

3.12. Risks and Mitigation Strategies

OCC's current CMS constitutes a sophisticated and indispensable framework, underpinning a wide spectrum of services and integrations with various tools and platforms. The migration of such a dense architecture, coupled with a diverse technology stack and interconnected applications, may involve cyclic dependencies, business-driven constraints, and technical complexities. Drawing from our past experiences, it is prudent to anticipate potential risks and establish mitigation strategies accordingly. Below are the identified risks along with suggested mitigation measures.

Technical Risks:

1. **Risk**: Certain components or modules within the CMS may have interdependencies, leading to cyclic dependencies that could impede migration progress.
   Mitigation: Conduct a thorough analysis of the existing architecture to identify cyclic dependencies. Prioritize the resolution of these dependencies by restructuring or refactoring the affected components.
2. **Risk: The complexity of the existing CMS, coupled with integrations with diverse** technologies, could introduce technical challenges during migration.
   Mitigation: Conduct comprehensive system analysis and documentation to gain a deep understanding of the existing architecture and integrations. Develop migration strategies tailored to address specific technical complexities, such as data migration scripts, custom integration solutions, and compatibility testing frameworks.
3. **Risk**: Data integrity and security vulnerabilities may arise during the migration process, posing risks to sensitive information and regulatory compliance.
   Mitigation: Implement robust data migration processes, including data validation and integrity checks, to ensure the accuracy and completeness of migrated data. Adhere to industry best practices for data security, encryption, and access control throughout the migration process. Conduct thorough security assessments and penetration testing to identify and address potential vulnerabilities proactively.
4. **Risk**: Data loss or corruption during the migration. There is a potential risk of data loss or corruption.
   Mitigation: Implement comprehensive data backup strategies and utilize robust data migration tools with integrity checks. Maintain regular backups and establish a rollback plan in case of data inconsistencies.
5. **Risk**: Integration failures with existing systems. Integration issues may arise when integrating Drupal with current OCC systems.
   Mitigation: Thoroughly test integration points in a staging environment before migration. Keep legacy systems on standby to ensure uninterrupted business continuity.

6. **Risk**: Performance discrepancies. There may be performance variations in the new hosting environment.
   Mitigation: Conduct load testing to verify that Acquia Cloud meets required performance standards. Collaborate with Acquia to adjust resources and optimize configurations as necessary.
7. **Risk:** Security and compliance gaps. Ensuring compliance with federal security standards in the new system.
   Mitigation: Conduct security audits and collaborate with Acquia's compliance and security teams for reviews. Develop a security remediation plan to promptly address any compliance issues.
8. **Risk:** Custom module migration issues. Some custom modules in the legacy CMS may lack direct equivalents in Drupal.
   Mitigation: Identify necessary custom modules early and develop them within Drupal. Maintain parallel operation of the old system for critical functionalities until custom solutions are stable.

Business Risks:

1. **Risk**: Business requirements and constraints may pose challenges during migration, such as maintaining uptime for critical services or adhering to regulatory compliance.
   Mitigation: Engage closely with OCC stakeholders to understand critical business processes and requirements. Develop a phased migration approach that prioritizes critical services and minimizes disruption. Implement robust rollback procedures to address any unforeseen issues and ensure continuity of operations.
2. **Risk**: Limited resources, including time, budget, and skilled personnel, may impact the migration timeline and quality of outcomes.
   Mitigation: Allocate sufficient resources and establish clear roles and responsibilities for all stakeholders involved in the migration project. Prioritize critical tasks and allocate resources accordingly. Consider engaging service providers with deep expertise along with proven past performance to expedite the migration process.
3. **Risk**: Service Level Agreement (SLA) misalignment. Potential misalignment between Acquia's SLAs and OCC's operational requirements.
   Mitigation: Review and negotiate SLAs with Acquia to ensure alignment with OCC's needs. Establish internal support measures to cover any gaps in Acquia's SLAs.
4. **Risk**: User adaptation and training. Staff may encounter challenges in adapting to the new CMS.
   Mitigation: Provide comprehensive training and support as outlined in the training strategy. Offer extended support and refresher training sessions post-migration to facilitate user adaptation.

General Mitigation Strategies:

1. **Risk Workshops**: Collaborate with stakeholders in risk identification workshops to uncover potential risks that may not have been initially anticipated.
2. **Change Management**: Implement a structured change management process to address both the human and process-related aspects of the migration, ensuring smooth transitions and minimizing resistance to change.

3. **Quality Assurance**: Implement a comprehensive quality assurance process throughout the migration to verify that functionality and performance meet expected standards and requirements.

A comprehensive risk assessment and mitigation strategy are critical to the successful migration of OCC's CMS to Acquia Drupal. By anticipating potential risks and preparing effective mitigation and contingency plans, OCC can ensure that the migration enhances its digital service offerings without disrupting operations or compromising security.

3.13. Conclusion:

By embracing this strategic transition, we affirm the multitude of benefits it brings forth. Drupal emerges as the CMS of choice, celebrated for its unmatched flexibility, extensive scalability, and robust security – all indispensable pillars supporting OCC's intricate digital ecosystem. Its open-source nature fosters innovation and adaptability, ensuring that OCC's digital services evolve seamlessly alongside emerging trends and user demands.

The selection of Acquia for Drupal CMS hosting further enhances these advantages by providing a secure, compliant, and high-performing cloud environment optimized for Drupal. Acquia's platform, with its FedRAMP Moderate compliance assurance, plays a pivotal role in meeting federal operational standards. The synergy between Drupal and Acquia fosters an ecosystem where efficiency, reliability, and user-centricity take center stage.

In addition to the best-in-class FedRAMP-certified PaaS CMS platform, the importance of selecting the right service providers cannot be overstated. With Team Stealth, OCC gains access to a skilled team with a proven track record and a commitment to meeting OCC's specific requirements and timelines. Our meticulous planning, rigorous testing, and phased implementation approach underscore our dedication to delivering a seamless migration and ensuring continuity of services. This endeavor is not merely about altering the technological landscape; it is about elevating it to align with OCC's mission-critical objectives.

Looking ahead, we envision a transformed digital experience for OCC. Envision a CMS where content delivery is swift and secure, user engagement is insightful and meaningful, and compliance is inherent and assured. We foresee a future where OCC's digital services set the standard for federal agencies, empowered by a platform as dynamic and forward-thinking as the financial institutions it oversees. This transition signifies not just a new chapter in OCC's digital narrative but a leap into a future where digital government services are more accessible, interactive, and effective than ever before.

4. Factor 4: Use Case Demonstration:

A written response is not required for this factor as part of Volume II.

5. Factor 5: VPAT:

The **Voluntary Product Accessibility Template (VPAT)** for Acquia Drupal Cloud CMS is provided in Appendix A.

APPENDIX A ACQUIA DRUPAL VPAT

Accessibility Conformance Report for Acquia Cloud Platform

Based on VPAT® Version 2.4

Divya Mangadu, UX Designer and Alison Voghel, Sr. UX Designer January 21, 2022

Executive Summary

The **Voluntary Product Accessibility Template®**, or **VPAT®**, is a template used to document a product's conformance with accessibility standards and guidelines. The outcome of completing the testing required in the template is an Accessibility Conformance Report (this document) and is used to assist customers and buyers in making preliminary assessments regarding the availability of commercial "Electronic and Information Technology," also referred to as "Information and Communication Technology" (ICT) products and services, with features that support accessibility.

For each of the standards, the criteria are listed by chapter in Table 1: Success Criteria, Level A and Table 2: Success Criteria, Level AA. The structures of the tables are: the first column contains the criteria being evaluated, the second column describes the level of conformance of the product regarding the criteria, and the third column contains any additional remarks and explanations regarding the product.

When sections of criteria do not apply, or are deemed as not applicable, the section is noted as such and the rest of that table may be removed for that section. When multiple standards are being recorded in this document, the duplicative sections are noted and responded to only one time.

This report describes the conformance of Acquia's Cloud Platform product with W3C's Web Content Accessibility Guidelines (WCAG). The review process is described below, and is based on evaluation described in W3.org's Accessibility Evaluation Resources.

Based on this evaluation, Acquia's Cloud Platform is close to meeting WCAG 2.1, Conformance Level AA. Detailed review results are available in Table 2 below.

The evaluation results in this report are based on the evaluation conducted during December, 2021. The product may have changed since that time.

Name of Product/Version: Acquia Cloud Platform

Product Description: The leading Drupal cloud platform to securely develop, deliver, and run websites, applications and content.

Contacts: Divya Mangadu (UX Designer) and Alison Voghel (Sr. UX Designer)

Evaluation Methods Used: aXe Chrome Extension and manual testing including the use of the VoiceOver screen reader. A full report of details, including violations, is available, if requested.

Exclusions: This report focuses solely on the out-of-the-box product and does not apply to extensions and entitlements available for Acquia Cloud Platform. It also does not apply to help documentation (docs.acquia) or the help/support ticketing system (a third party service).

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standards/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (**Yes**) Level AA (**Yes**) Level AAA (**No**)

Web Content Accessibility Guidelines 2.1	Level A (**Yes**) Level AA (**Yes**) Level AAA (**No**)

Revised Section 508 Standards (**Yes**)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports**: Some functionality of the product does not meet the criterion. - **Does Not Support**: The majority of product functionality does not meet the criterion. - **Not Applicable**: The criterion is not relevant to the product.

WCAG 2.1 Report

Table 1 and Table 2 also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

For details on each WCAG item's correlation with Section 508, please refer to the U.S. Access Board's equivalency chart. Any exceptions noted below are consistent with those reported in Tables 1 and 2 of the WCAG analysis.

Note: When reporting on conformance with the WCAG Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG Conformance Requirements.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content	**Partially Supports**	Acquia provides users with text-based alternatives for most non-text elements. However, there are some exceptions: ● profile images do not provide a text alternative ● progress bar nodes do not provide an accessible name
1.2.1 Audio-only and Video-only(Prerecorded)	**Not Applicable**	There is no relevant audio or video content within the Acquia Cloud Platform interface.
1.2.2 Captions (Prerecorded)	**Not Applicable**	There is no relevant audio or video content within the Acquia Cloud Platform interface.
1.2.3 Audio Description or Media Alternative (Prerecorded)	**Not Applicable**	There is no relevant audio or video content within the Acquia Cloud Platform interface.
1.3.1 Info and Relationships	**Partially Supports**	Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text in Acquia Cloud Platform, with the following exceptions: ● Heading tags not used or used in non-sequential order ● Titles of card elements and page sections not labeled as headings ● Some components that are part of a list of content are not contained within a list tag ● Some list elements have direct children that are not allowed inside elements

		● Some list items do not have a , parent element ● Some table headers do not have text that is visible to screen readers ● Some required ARIA parent roles are not present ● Some pages contain multiple elements referenced with the same id attribute ● Some data in table headers do not refer directly to data cells ● Several pages are missing an H1 Title ● Some form fields are not labeled with accessible names (cannot be accessed by a screen reader)
1.3.2 Meaningful Sequence 1.3.3 Sensory Characteristics	**Partially Supports** **Partially Supports**	When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined in Acquia Cloud Platform, with the following exception: ● On several pages, screen readers pick up page content but no navigational elements When instructions are provided for understanding and operating content, some instructions do not rely solely on sensory characteristics of components within the Acquia Cloud Platform interface with the following exceptions: ● Instructional content provided on some key pages and processes does not include the text identifier of the referenced component (button, control component, etc) However, multiple pages across the platform do not include instructional content that references the controls needed to complete a process or access information at all.
1.4.1 Use of Color	**Supports with Exceptions**	Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or

		distinguishing a visual element within the Acquia Cloud interface with the following exceptions: ● In-text link color does not have a high enough contrast with non-clickable body text in multiple places across the platform.● In-text links do not have any non-color visual enhancements upon mouseover in multiple places across the platform. ● In some instances, color is solely used to convey information on some charts within the platform
1.4.2 Audio Control	**Not Applicable**	No relevant audio or video content within the Acquia Cloud Platform interface.
2.1.1 Keyboard 2.1.2 No Keyboard Trap	**Partially Supports** **Supports**	Most functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes within the Acquia Cloud Platform interface. If keyboard focus can be moved to a component of the page usinga keyboard interface, then focus can be moved away from that component using only a keyboard interface within the Acquia Cloud Platform interface.
2.1.4 Character Key Shortcuts 2.2.1 Timing Adjustable 2.2.2 Pause, Stop, Hide	**Not Applicable** **Not Applicable** **Not Applicable**	Keyboard shortcuts are not implemented in any part of the Acquia Cloud Platform interface. No audio and video within the Acquia Cloud Platform interface. No audio and video within the Acquia Cloud Platform interface.

2.3.1 Three Flashes or Below Threshold	**Supports**	No flashing elements within the Acquia Cloud Platform interface.

2.4.1 Bypass Blocks	**Does Not Support**	A mechanism is not available to bypass blocks of content that are repeated on multiple Web pages within the Acquia Cloud Platform interface.
2.4.2 Page Titled	**Partially Supports**	Most pages within the Acquia Cloud Platform interface have titles that describe the topic or purpose of the page with a few exceptions.
2.4.3 Focus Order	**Partially Supports**	If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability within the Acquia Cloud Platform interface with a few exceptions.
2.4.4 Link Purpose (In Context) 2.5.1 Pointer Gestures 2.5.2 Pointer Cancellation	**Partially Supports** **Not Applicable** **Partially Supports**	The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, with exceptions within the Acquia Cloud Platform interface: ● Some instances of text links do not currently clarify or disambiguate the exact action that they are prompting. There are no multipoint or path-based gestures within the Acquia Cloud Platform interface. For functionality within Acquia Cloud Platform that can be operated using a single pointer, there is no down-event and there is the ability to abort/undo or reverse the action with an up-event, with one exception: ● When using a drag-and-drop feature within an application, an up-event outside of all targets does not cancel the action; however, the resulting action is reversible.

2.5.3 Label in Name	**Partially Supports**	For user interface components with labels that include text or images of text, the [accessible] name contains the text that is presented visually with the following exceptions: ● Some search filtering fields do not have labels that contain the visual text presented. ● Environment controls do not have accessible names that include the visual text presented. ● Some form fields do not have accessible names that include the visual text presented. ● Some data table functionalities (e.g., “view”, “delete”, do not have accessible names that include the text visually presented.
2.5.4 Motion Actuation	**Not Applicable**	The Acquia Cloud Platform interface does not include any functionality that can be operated by device motion or user motion
3.1.1 Language of Page	**Partially Supports**	The default human language of each web page can be programmatically determined within the Acquia Cloud Platform interface, with one specific exception on the Add Applications page.
3.2.1 On Focus	**Supports**	When any component receives focus, it does not initiate a change of context within the Acquia Cloud Platform interface.
3.2.2 On Input	**Partially Supports**	Changing the setting of any user interface component does not automatically cause a change of context with a few exceptions within the Acquia Cloud Platform interface with the following exceptions:

		• Some buttons and links (<10) direct the user to the insight.acquia.com interface. This interface is part of the product but looks completely different from the majority of the product, and a number of updates/revisions are planned for the 2022 roadmap.

3.3.1 Error Identification	**Partially Supports**	If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text within the Acquia Cloud Platform interface with the following exceptions: ● Some forms (< 5) only surface one error at a time. ● Certain errors are not identified or described in text thoroughly (e.g., the errors have text identifiers but it is unclear which field is triggering the associated error).
3.3.2 Labels or	**Partially Supports**	Labels or instructions are provided when content requires user input within the Acquia Cloud Platform interface with the following exceptions: ● Some form fields are missing instructional content around input formatting (e.g., email fields, zip codes) ● Search filters do not have static labels or identifiers; The current labels disappear once the user starts typing within the field.
Instructions 4.1.1 Parsing	**Partially Supports**	In Acquia Cloud Platform content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, with the following exceptions:

		● In some instances, separate pieces of content on the same page have the same ID attribute

4.1.2 Name, Role, Value **Partially Supports** For most Acquia Cloud Platform user interface components, the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is

available to user agents, including assistive technologies, with the following exceptions:

- Some card elements are not contained within a list component so that they may be easily scanned by assistive technologies or enumerated for clarity.
- Some elements have invalid ARIA attribute names attached to them
- Some icons (including the Help icon and expand/collapse icons) do not contain text discernible by a screen reader and therefore the purpose may be obscured for those using that assistive technology.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations

1.2.4 Captions (Live)	**Not Applicable**	There is no relevant audio or video content within the Acquia Cloud Platform interface.
1.2.5 Audio Description (Prerecorded)	**Not Applicable**	There is no relevant audio or video content within the Acquia Cloud Platform interface.
1.3.4 Orientation	**Supports**	Content in Acquia Cloud Platform does not restrict its view and operation to a single display orientation, such as portrait or landscape.
1.3.5 Identify Input	**Partially Supports**	The purpose of each input field in Acquia Cloud Platform that is collecting information about the user can be programmatically determined with the following exceptions: ● Some autocomplete HTML attributes are missing from input fields ● For some email input fields, it is not programmatically clear that the field is intended for someone else's email address and not the user's own ● Some autocomplete attributes are incorrectly formatted
Purpose 1.4.3 Contrast	**Partially Supports**	The visual presentation of text and images of text meet the required color contrast ratios with the following exceptions: ● Placeholder text within filtered search bars, some form fields, and tagging functionality does not meet the 4.5.1 contrast ratio for non-large text. ● Some help text for form fields does not meet the 4.5.1 contrast ratio required for non-large text.

(Minimum)		

1.4.4 Resize text	**Supports**	Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality within the Acquia Cloud Platform interface.
1.4.5 Images of Text	**Partially Supports**	Where possible to do so in the Acquia Cloud Platform interface, text is used to convey information rather than images of text with the following exception: • An image of text is used as a label for the version of PHP in some display modes.
1.4.10 Reflow	**Does Not Support**	Content on all pages cannot be presented without loss of information or functionality, and without requiring scrolling in two dimensions.

1.4.11 Non-Text Contrast	**Partially Supports**	The visual presentation of user interface components and graphical objects have a contrast ratio of at least 3:1 against adjacent color(s) with the following exceptions: ● Some action icons' inactive states do not meet the contrast ratio ● In some cases, an icon that represents a status or warning does not meet the minimum
1.4.12 Text Spacing	**Partially Supports**	Text elements on some pages incur a loss of content or functionality when assistive technology designed to increase legibility for certain users by overriding some text styles (i.e. line height, letter spacing, word spacing) are utilized.
1.4.13 Content on Hover or Focus	**Partially Supports**	Where receiving and then removing pointer hover or keyboard focus triggers additional content to become visible and then hidden, it is dismissible, hoverable, and persistent with the following exceptions: ● Tooltip content is not persistent and disappears when the mouse pointer is moved off the icon's or button's hitbox

2.4.5 Multiple Ways	**Partially Supports**	More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process within the Acquia Cloud Platform interface with the following exceptions: ● Multiple pages that manage the overall functionality of individual applications can only be located in one way ● Some pages (< 2) that manage development environment functionality can only be accessed in one way.

2.4.6 Headings and Labels	**Partially Supports**	Headings and labels describe topic or purpose within the Acquia Cloud Platform interface with some exceptions: ● Some section headings on certain pages are not programmatically named as headings ● Some page titles display data rather than clarify the overall purpose of the page.
2.4.7 Focus Visible	**Partially Supports**	Most keyboard operable interfaces in Acquia Cloud Platform have a mode of operation where the keyboard focus indicator is visible, with the following exceptions: ● In some instances, the focus state on an object is not visible or is partially obscured by another element.
3.1.2 Language of Parts	**Not Applicable**	The human language of each passage or phrase in the Acquia Cloud Platform interface is the same as the page language so does not need to be programmatically defined separately.
3.2.3 Consistent Navigation	**Partially Supports**	Navigational mechanisms that are repeated on multiple web pages within a set of web pages occur in the same relative order each time they are repeated within the Acquia Cloud Platform interface, with the following exceptions: ● The location of buttons used for navigation is not consistent within the product.

		● Some pages (< 5) do not have the same upper level navigation as the rest of the platform.

3.2.4 Consistent Identification	**Partially Supports**	Components that have the same functionality within a set of web pages are identified consistently within the Acquia Cloud Platform interface with the following exceptions: ● The “Edit settings”, “Add tags”, and “Add members” functionalities have two different identifiers across the product pages.
3.3.3 Error Suggestion	**Partially Supports**	If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user with the following exceptions: ● Some error suggestion text does not communicate why a user input is invalid and does not suggest a way to fix the error. ● Some forms do not provide error suggestion text at all.
3.3.4 Error Prevention (Legal, Financial, Data)	**Supports**	For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: ● Submissions are reversible ● Data entered by the user is checked for input errors and the user is provided an opportunity to correct them ● A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission
4.1.3 Status Messages	**Partially Supports**	Most status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus with the following exceptions:

		• All status information conveyed as toasts does not have a role designation within the code. • Some status information conveyed with in-page notification components do not have a role designation within the code. • All error text conveyed as help text does not have a role designation within the code. • Some status indicators do not have a role designation.

Revised Section 508 Report

Table 3: Functional Performance Criteria (FPC), Section 508

Tables 1 and 2 (previous section) also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

For details on each WCAG item's correlation with Section 508, please refer to the U.S. Access Board's equivalency chart. Any exceptions noted below are consistent with those reported in Tables 1 and 2 of the WCAG analysis.

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	**Partially Supports**	Where a visual mode of operation is provided, Acquia Cloud Platform provides at least one mode of operation that does not require user vision, with some exceptions.
302.2 With Limited Vision	**Partially Supports**	Where a visual mode of operation is provided, Acquia Cloud Platform provides at least one mode of operation that enables users to make use of limited vision, with some

		exceptions.

302.3 Without Perception of Color **Partially Supports** Where a visual mode of operation is provided, Acquia Cloud Platform provides at least one visual mode of operation that does not require user perception of color, with some exceptions.

302.4 Without Hearing **Not Applicable** Acquia Cloud Platform does not provide an audible mode of operation.

302.5 With Limited Hearing **Not Applicable** Acquia Cloud Platform does not provide an audible mode of operation.

302.6 Without Speech	**Not Applicable**	Acquia Cloud Platform does not provide a mode of operation where speech is used for input, control, or operation.
302.7 With Limited Manipulation	**Supports**	Where a manual mode of operation is provided, Acquia Cloud Platform provides at least one mode of operation that does not require fine motor control or simultaneous manual operations.
302.8 With Limited Reach and Strength	**Supports**	Where a manual mode of operation is provided, Acquia Cloud Platform provides at least one mode of operation that is operable with limited reach and limited strength.
302.9 With Limited Language, Cognitive, and Learning Abilities	**Partially Supports**	Acquia Cloud Platform provides features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier, with some exceptions.

Results and Recommended Actions

With the establishment of Acquia's multidisciplinary Accessibility Working Group, representatives across the User and Customer Experience, Product Management, and Engineering functions are collaborating to remedy the exceptions and non-compliant criteria identified in this report. Our remediation plan is as follows:

First, the relative priority for all open issues will be assessed with respect to the severity of the issue and the amount of effort (both design and engineering) required to address it. In this case, severity specifically refers to the union of "impact" (how much does this hinder a user?) and "prevalence" (across the platform).

Second, after determining each issue's priority, Acquia's UX and Engineering teams will organize the open issues into user stories. These aggregations of work, in turn, will then be addressed during the associated design and engineering Sprints, as per Acquia's established product development lifecycle processes. This report will be updated whenever substational remediations occur, and are deployed to the Acquia Cloud Platform.

The team also plans on repeating its comprehensive testing of the Acquia Cloud Platform product once the WCAG 2.2, and even 3.0, criteria are finalized, certified, and published. In the interim, the team will continue periodically monitoring the working documents provided by the W3C Accessibility Guidelines (WCAG) 3.0 Accessibility Guidelines Working Group (together with the Silver Task Force and Silver Community Group) and incorporating appropriate preliminary guidance into our design and development processes.