State of Bureau Websites and Digital Services

Response to 21st Century Integrated Digital Experience Act reporting requirement

cfpb Consumer Financial
Protection Bureau

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1. Introduction

The 21st Century Integrated Digital Experience Act or the 21st Century IDEA ("the Act")[1] seeks to improve the digital services of executive agencies by laying out requirements for website and digital service development. The best practices detailed in the Act include accessibility in accordance with section 508 of the Rehabilitation Act of 1973[2], consistent visual design, attention to user needs, functionality on mobile devices, and web services provided over a standard secure connection.

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

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

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[1] Public Law No. 115-336

[2] 29 U.S.C. § 794d

2. CFPB websites and digital services

Since its creation in 2011, the Bureau has invested in using technology to advance its mission. The Bureau established a unique-to-government, in-house technical team with the expertise to build and maintain the website and digital services with attention to user needs and modern, secure development standards. That team maintains and iteratively improves the Bureau's primary website, www.consumerfinance.gov, ensuring that it meets the standards of the Act. The Bureau's primary transactional digital service, the submission of a complaint form[3], is similarly fully accessible and built to ensure that users can fill out the form accurately and efficiently.

In 2020, the Bureau continued to improve on our website, making information easier for the public to find as well as improving the internal security and stability of our platform. The Consumer Complaint Database[4], a collection of complaints about consumer financial products and services, was upgraded to include an entirely new geography-centric interface and interactive visualizations of trends across multiple dimensions, such as time period, geography, financial product, and complaint topic. Behind the scenes, Bureau teams expanded automated testing, replaced or updated legacy software, and expanded our open-source Design System[5] documentation.

The Bureau also responded quickly to the coronavirus pandemic by gathering resources and critical information at https://www.consumerfinance.gov/coronavirus/, and working with the Federal Housing Finance Agency (FHFA), U.S. Department of Housing and Urban Development (HUD), U.S. Department of Veterans Affairs (VA), and U.S. Department of Agriculture (USDA) to establish a portal[6] specifically for homeowners and renters to find pandemic-related information.

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[3] https://www.consumerfinance.gov/complaint/getting-started/

[4] https://www.consumerfinance.gov/data-research/consumer-complaints/

[5] https://cfpb.github.io/design-system/

[6] https://www.consumerfinance.gov/coronavirus/mortgage-and-housing-assistance/

2.1 List of websites and digital services

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

The Bureau does not maintain any public-facing "apps" or non-web-based digital services. Two of the Bureau's digital services provided for specific, target audiences require further modernization in order to meet the standards of the Act.

TABLE 1:   CFPB WEBSITES AND DIGITAL SERVICES

Description	URL	21st Century IDEA standards[7]
Primary website, vast majority of information and tools for public engagement found here	www.consumerfinance.gov	Meets all standards
Public complaint submission form and secure company and consumer portals	complaint.consumerfinance.gov	Meets all standards
Portal for submitting and browsing mortgage date required by HMDA[8]	ffiec.cfpb.gov	Meets all standards
Library of frequently asked questions for HMDA filers, known as HMDA Help	hmdahelp.consumerfinance.gov/knowledgebase/	Has not been audited for Section 508 compliance, inconsistent appearance, limited data on user needs
Online portal for financial institutions to submit prepaid account agreements and credit card plan terms	collect.consumerfinance.gov	Meets all standards
Online portal for financial institutions subject to an examination to share files with Bureau examiners	extranet.cfpb.gov	Has not been audited for Section 508 compliance, limited data on user needs and behaviors tracked

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[7] 21st Century IDEA - 44 U.S.C. § 3501 note.

[8] Home Mortgage Disclosure Act, 12 U.S.C. § 2801 et seq.

3. Looking ahead

While the coronavirus pandemic changed many priorities in 2020, the Bureau continued to maintain a high standard for our digital products. Going forward, the Bureau will seek to maintain this culture of technical innovation and continue to follow the best practices described in the Act to ensure all standards are met.

3.1 Estimates for modernization

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

In order to address requirements around Section 508 and user needs to the Extranet, the Bureau intends to conduct an assessment project to document and prioritize accessibility gaps and critical issues. Once started, this assessment project is estimated to take three months of part-time labor at a cost of $10,000 to complete. The assessment project will identify the cost and schedule to address identified usability and modernization opportunities. In addition, information from this assessment will inform a future decision around migrating core Extranet functionality to a shared platform service or continuing to iterate on the current platform.

Updates to the HMDA Help site to introduce consistent visual design and address 508 accessibility will be part of a larger design review of the HMDA Platform scheduled to begin in 2021. This work would bring the HMDA Help sub-site into the larger https://ffiec.cfpb.gov site ecosystem, allowing it to leverage shared assets and visual styles. This work is estimated to take three months of part-time labor at a cost of $10,000 to complete.