

# Information Resources Management (IRM) Strategic Plan

Fiscal Years 2023-2025

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# Message from the Chief Information Officer

I am pleased to present the Fiscal Year (FY) 2023-2025 Consumer Financial Protection Bureau (CFPB) Information Resources Management (IRM) Strategic Plan. The IRM Strategic Plan describes how the Office of Technology & Innovation (T&I), in partnership with other CFPB offices, will continue to deploy innovative technologies and provide data analytics to protect consumers.

T&I promotes the secure and effective use of data and technology to enable the Bureau's mission. We provide modern, cloud-based platforms that allow our nationwide workforce to collaborate in a hybrid environment and directly support the CFPB's strategic objectives. We view data and information as enterprise assets that we securely put at the fingertips of authorized internal and external stakeholders. This approach positions the Bureau to be able to adapt to evolving mission needs and a dynamic technology environment.

The IRM Strategic Plan describes our strategy and execution plan for IT modernization and enhancing how the Bureau leverages information technology and resources.

Additionally, the IRM Strategic Plan consolidates our strategic technology principles and goals into a single document. As such, it serves as a practical guide for T&I teams and other Bureau technology efforts to develop more detailed plans, technical strategies, and related guidance.

Our focus will continue to be on empowering the American consumer in the financial marketplace and providing enhanced capabilities for our highly mobile workforce, while building out future-proof technical capabilities that support our mission.

Sincerely,

Chris Chilbert

Chief Information Officer

# 1. Introduction

The Consumer Financial Protection Bureau is a federal agency established by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Congress established CFPB to regulate the offering and provision of consumer financial products or services under the federal consumer financial laws, and to educate and empower consumers to make better informed financial decisions.

## 1.1 CFPB Strategic Goals

The CFPB’s Strategic Plan describes the mission, long-term goals, and results that CFPB seeks to accomplish. The strategic goals of the Bureau are described in Table 1.

**TABLE 1:** CFPB STRATEGIC GOALS

Goal	Description
Goal 1	Implement and enforce the law to ensure consumers have access to fair, transparent, and competitive markets that serve consumers’ needs and protect consumers from unfair, deceptive, and abusive practices, and from discrimination.
Goal 2	Empower consumers to live better financial lives, focusing on traditionally underserved people.
Goal 3	Inform public policy with data-driven analysis on consumers’ experiences with financial institutions, products, and services.
Goal 4	Foster operational excellence and further commitment to workforce equity to advance the CFPB’s mission.

[The Consumer Financial Protection Bureau Strategic Plan for FY 2022-2026](#) expands on these goals to include a set of desired outcomes, strategies, and specific performance measures. This strategic view provides the context and framework for developing the CFPB Information Resource Management (IRM) Strategic Plan. Many of the Bureau’s outcomes outlined in the Bureau Strategic Plan also provide the basis for aligning specific technology strategies that inform the Bureau’s Information Resources Management (IRM) Strategic Plan.

## 2. CFPB IRM Strategy

The CFPB Strategic Plan acknowledges the Bureau’s commitment to leveraging modern technologies that provide significant mission value. Consumer protection begins with ensuring that all consumers have access to markets for consumer financial products and services. Consumer access is further enhanced when consumers can reasonably obtain the information, they need to make informed decisions. To enable this, the CFPB leverages technology to:

- Create a streamlined organization that effectively communicates information across teams and through the Bureau,
- Provide online products that help inform consumers by making critical data available internally and to the public, and
- Enhance transparency by making our datasets accessible to the public when doing so is legally permissible and appropriate.

### 2.1 The CFPB IT Strategic Framework

#### 2.1.1 CFPB IT Vision and Mission

The CFPB IT vision is to provide world class IT services that support fair, competitive, and transparent consumer finance markets. Our mission is to empower the Bureau, consumers, and the financial marketplace by delivering innovative technology, enabling seamless execution of core processes, adapting to technology and market changes, and securely analyzing data. We aspire to be a best-in-class technology team within the federal government that enables the American people and mobile workforce by providing high-quality digital government information and services. Using Development, Security and Operations (DevSecOps) <sup>1</sup>methods and adopting open data and open-source strategies, we build in security, privacy, and data protection throughout the entire technology life cycle. We help unlock the power of government

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<sup>1</sup> An IT delivery methodology that aims to alter culture and practice to create a delivery workflow that meets the needs of security, development, and operations stakeholders with minimal overhead. SecDevOps includes security-focused automation, a reliable release pipeline, automation of common tasks, and solutions to enable stronger collaboration across all stakeholders (security, development, and operations) with the goal of deploying working functionality to the end-user faster.

data to spur innovation and improve the quality of services for the American people while promoting the safe and secure adoption of new technologies.

## 2.1.2 CFPB IT Values and Principles

### Values

Our values are enduring, passionate, and distinctive core beliefs. Our values motivate our behavior and actions. They define how we operate internally and in relation to those with whom we interact, work, and serve. They are “What” we stand for as a team.

Depicted in Figure 1, our values describe our **Commitment** to those we work with and serve. They describe our approach to **Leadership** at all levels of the organization. Key to our values is that we strive for **Innovation** in the solutions we deliver and how we do things. Also important is that our values recognize our **People** and the diverse skills and perspectives necessary to deliver our mission.

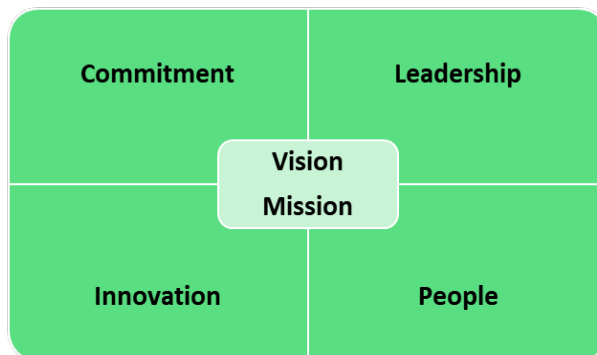


FIGURE 1: OUR VALUES

These values are further described as follows:

**Commitment** Our mission begins with commitment to the consumer. We serve consumers by empowering our colleagues with leading-edge technology services.

**Leadership** Fostering leadership and collaboration at all levels is at the core of our success. We invest in the growth of our colleagues and are dedicated to holding ourselves accountable to the American people.

**Innovation** Our organization embraces new ideas and technology. We are

focused on pursuing excellence through continuously learning and improving.

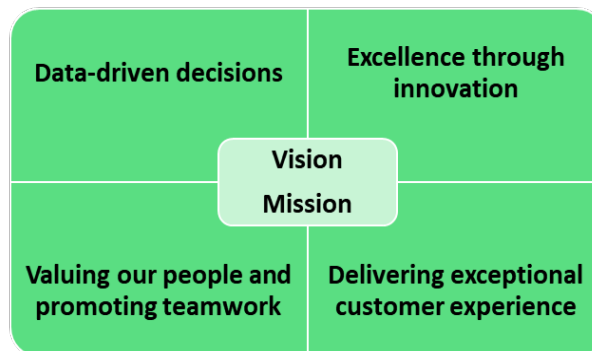
### **People**

We are a diverse team with varied backgrounds and abilities who are empowered to make meaningful contributions and grow our knowledge and skills.

## Principles

Our principles are enduring tenets to be adhered to no matter what activity we engage in. Our principles describe “How” we achieve our goals. They connect our values to our actions.

As shown in Figure 2, our principles describe our approach to making ***data-driven decisions*** that guide our actions, achieving ***excellence through innovation*** in how we deliver products and services, ***valuing our people and promoting teamwork*** in our everyday interactions, and ***delivering exceptional customer experience*** for our stakeholders.



**FIGURE 2: OUR PRINCIPLES**

Our principles are further described as follows:

**Data-driven decisions** We securely ingest, integrate, store, analyze, and share data to inform decisions with data-driven analyses, and protect the personally identifiable information (PII) and other confidential information that we collect and use such as confidential supervisory information (CSI), and external parties proprietary information.

**Excellence through innovation** We embrace innovation to enhance the CFPB’s reach, impact, and effectiveness. Our relentless pursuit of excellence,



continuously experimenting with new processes and technologies, serves as a model within government.

**Valuing our people and promoting teamwork**

Our people are our greatest asset and they are a representation of the people we serve. We invest in world-class training and development to create an environment that encourages employees at all levels to tackle complex challenges. We work alongside our Bureau colleagues to deliver the CFPB mission and believe that effective teamwork extends outside the walls of the CFPB. We seek input from and collaborate with consumers, industry, government entities, and other external stakeholders.

**Delivering exceptional customer experience**

We build, deliver, and manage products and services that are responsive to the needs of the people who use them, both within and external to the Bureau. We encourage and empower our team to actively evolve and improve our products and services in ways that benefit consumers and our stakeholders. Our services are simple, secure, effective, and equitable.

### 2.1.3 T&I Strategic Goals, Objectives, and Key Results

Our IT Strategic Framework describes the goals, objectives, and key results designed to achieve its vision for a modern technology environment at the Bureau. Central to this vision is that Bureau personnel will be able to collaborate more easily from any place, and at any time. In addition, the Bureau's information will be more secure, and the infrastructure more efficient. While some improvements will be invisible to most people, others, like new office and communication software, will change and improve the way our people work.



**FIGURE 3: CFPB IT GOAL AND OBJECTIVES**

Our goals (see Figure 3) directly acknowledge the collaborative role that we must play in working with the business to deliver solutions that best support Bureau mission needs. These goals provide an overarching framework that includes line-of-sight and traceability into how the goals are achieved through a set of actionable objectives, related investments, and targeted key results that are aligned to our strategic goals.

- **Goal 1** is intended to amplify the Bureau’s presence, reach, and value on mission needs. We will lead efforts to promote a greater breadth and depth of data analytics and provide more efficient access to information both for internal and external users.
- **Goal 2** is focused on establishing a secure and reliable IT infrastructure. This goal involves the underlying technologies that support the Bureau’s information needs. We will continue a pattern of innovation in delivering a cloud-native strategy that provides for enhanced service delivery and scalability.
- **Goal 3** is to empower the Bureau’s workforce to serve the American consumer. This includes efforts to implement a mobile-first strategy for the Bureau’s technology tools and systems, provide greater collaboration capabilities and tools and technology that will improve process automation and workflow.
- **Goal 4** is focused on developing high-performing CFPB operations. The guiding vision is to deliver a unified technology team effort, where the technology team is viewed as a valued and highly effective partner by the mission areas we serve.

We further translate the above goals and objectives into a Strategy in Action in the form of quarterly outcome-focused Operational Plans using Objective Key Results (OKRs) that track actions and results for key priority initiatives monthly. Identifying priority initiatives focuses OKR development toward those areas that are of greatest strategic importance in the near term. Our Operating Plans and OKRs are reviewed on a quarterly basis, and new OKRs and corresponding target values are set, thus maintaining ongoing alignment with CFPB mission priorities.

# 3. Building for the Future

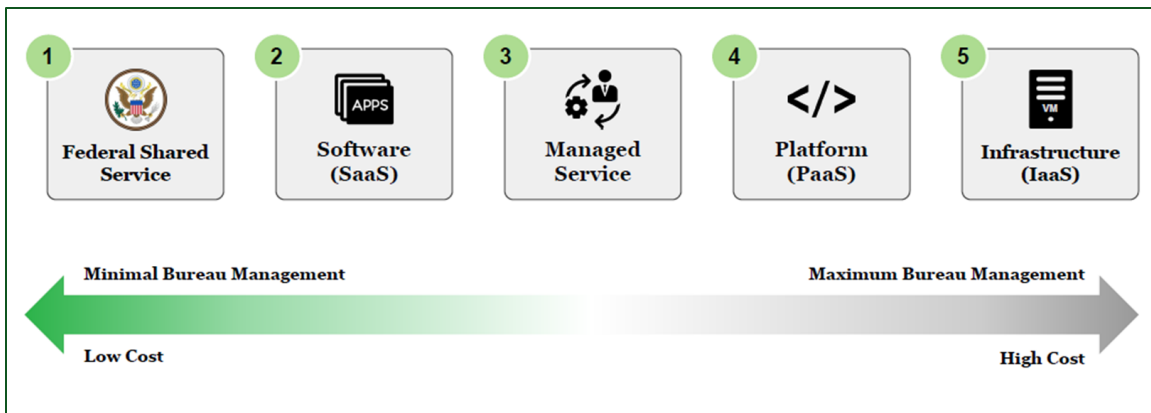
Information technology serves as the backbone for how the Bureau serves the public in the digital age. We focus on enhancing mission effectiveness by improving the quality and efficiency of citizen-facing services, using cloud-based solutions that meet CFPB needs today and in the future. Meeting customer expectations, keeping sensitive data and systems secure, protecting PII, and ensuring responsive, multi-channel access to services are all critical parts of our vision. Our investments in policy, people, processes, and platforms are also key elements of this effort and require Bureau-wide involvement to ensure an integrated IRM Strategy that encompasses all relevant governance, architecture, standards, and infrastructure.

## 3.1 CFPB Target Architecture

The Bureau's target architecture describes our vision to continue to move toward a modern digital workplace. It is a north star to guide planning and the near and longer-term evolution of the enterprise architecture. Business strategy, constraints, current state, and technological opportunities are combined to create a multi-year roadmap. The target state provides a framework for aligning technology decisions to strategic investments and serves as a basis for overall technology program planning and acquisition. It describes how strategic alignment, increased collaboration, innovative technology, and technology risk management contribute to mission effectiveness and operational efficiency within an evolving technology landscape. The following sections highlight key focus areas contributing to the target architecture composition.

### 3.1.1 Increased use of Cloud Services

As the Bureau continues to increase its "as a Service" approach, the target architecture considers five service delivery models that represent a spectrum of options to support the Bureau's applications, data, and infrastructure. In implementing the target architecture, our preference is for service delivery models that provide lower cost solutions with less management overhead, as depicted in Figure 4, but only when these service delivery models can satisfactorily deliver upon prioritized Bureau mission needs and service delivery requirements.



**FIGURE 4: PREFERENCES FOR SERVICE DELIVERY**

The 2019 Federal Cloud Computing Strategy from the Office of the Federal Chief Information Officer — is a long-term, high-level strategy to drive cloud adoption in Federal agencies. It offers a path forward for agencies to migrate to a safe and secure cloud infrastructure. The strategy supports agencies in achieving additional savings, security, and faster delivery services.

The CFPB Cloud Smart approach will improve and modernize the Bureau’s IT infrastructure, enabling faster delivery of technology capabilities to the Bureau. Cloud Smart means designing and acquiring new products and services delivered from a cloud infrastructure rather than from assets and infrastructure directly managed by CFPB in a physical location. Through the cloud services, CFPB will only pay for the cloud resources consumed rather than purchasing IT infrastructure directly. This includes giving precedence to cloud solutions in the evaluation process for new IT initiatives; enabling seamless and drop-in integration of future cloud and mobile services; and evaluating data centers for potential consolidation and transitioning from an on-premises infrastructure to a platform as a service (PaaS), software as a service (SaaS), or infrastructure as a service (IaaS) model.

Another facet of the CFPB’s IRM strategy is leveraging mobile devices to access the Bureau’s cloud-based products and services. Stakeholders will securely have the data they’re authorized to have at their fingertips. Having relevant content served quickly and efficiently through the cloud strengthens our connections between people, information, and services.

An example of this commitment to cloud services is a CFPB strategic Cloud Program initiative that is currently focused on defining and migrating many of our on-premises data center applications to our public cloud service boundaries. Key components of this Program include the migration our CFPB enterprise-wide data platform, security monitoring and incident management capabilities to public hosted cloud services with Federal Information Security Modernization Act (FISMA) and Federal Risk and Authorization Management Program (FedRAMP) alignment.

### 3.1.2 Zero Trust Architecture

Another significant component of the Target Architecture is focused on reducing cybersecurity risks and protecting sensitive information through improved policies and procedures, via alignment with the Bureau's Enterprise Risk Management (ERM) program, and by leveraging and implementing cutting edge cybersecurity capabilities available for managing a cloud-based IT infrastructure.

In line with Executive Order 14028, "Improving the Nation's Cybersecurity", and M-22-09, "Moving the U.S. Government Toward Zero Trust Cybersecurity Principles", CFPB recognizes the value of implementing a Zero Trust Architecture (ZTA) to protect the CFPB's mission, processes, technology, data, and people. In fact, CFPB has incorporated the ZTA in its development of near- and long-term Target Architectures since 2019, and the concepts of ZTA have since been incorporated into CFPB Technical Guidelines and Standards and our ongoing Enterprise Governance. CFPB assembled a Zero Trust (ZT) Working Group made up of leaders and subject matter experts from the Office of Technology and Innovation (T&I) and Office of the Chief Data Officer (OCDO) that have been actively updating our near and longer term ZT Target Architectures, together with a set of Roadmap Projects designed to achieve the targets. CFPB used the ZT Maturity Model published by the Cybersecurity and Infrastructure Security Agency (CISA) to assess and guide the design of the CFPB Target ZTA. The ZTA and associated projects making up the ZT Implementation Roadmap are underway now to continually evolve and execute the CFPB ZT strategy. Areas of emphasis include acquisition of a Secure Access Service Edge (SASE) capability designed to reduce our use of a CFPB managed network perimeter; increased deployment of an enterprise-wide identity management service; improve enterprise-wide inventory management; increased use of micro-segments among CFPB environments, application workloads and data; and continued partnership with CFPB data owners on data classification to better support least privilege access to application workloads and data.

Additional key technology service improvements to be implemented as part of the target architecture include the deployment of new laptops and the replacement of desk phones with a modern, more cost-effective integrated communication solutions that include phone, chat, video, and teleconferencing. It also includes further deployment of a cloud-based suite of applications that integrates email, calendars, creating, storing, and sharing documents, workspace management, user driven workflow automation, analytics, and knowledge management that will continue to improve how we work and collaborate across the Bureau.

The 2024 target architecture is focused on delivering better service to the general public while building and maintaining a modern, secure, and resilient IT infrastructure that supports the mission and business needs of the Bureau.

# 4. Achieving Our Goals

In FY 2023-2025, the Bureau will continue modernizing its information resources and technology by moving to a cloud-native environment. This will reduce the cost of operating and maintaining physical data infrastructure, increase security, improve user and customer experience, and align with Federal guidance.

A key component in monitoring our progress in delivering upon the goals of the IRM Strategic Plan is the Bureau FITARA scorecard. Passed by Congress in December 2014, FITARA is a historic law that represents the first major overhaul of Federal information technology in almost twenty years. Since FITARA's enactment, the Office of Management and Budget (OMB) published guidance to agencies to ensure that this law is applied consistently government-wide in a way that is both workable and effective. The U.S. House Oversight and Government Reform (OGR) Committee publishes the FITARA Scorecard rating federal agencies.

For Chief Financial Officers Act (CFO) agencies, the OGR Methodology for FITARA scoring is supported by the General Accountability Office (GAO) using publicly available data sources. Because the Bureau is not a CFO Act agency, we derive a self-assessed FITARA score using a methodology that is designed to be consistent with the OGR FITARA Scorecard to the greatest extent possible. The Bureau publishes the self-assessed FITARA score as part of the Bureau's Annual Performance Plan and Report.

## 4.1 Technology Business Management (TBM) Strategy

With the FY 2019 Capital Planning and Investment Control (CPIC) Guidance, OMB implemented the Technology Business Management (TBM) framework, leveraging the widely adopted framework and taxonomy, used within private, public, and academic sectors, to drive transparency of IT cost and performance across the federal government.

During FY 2023-2025, the Bureau will also adopt and implement the TBM as a standard framework for describing IT services and demonstrating value. TBM will provide a mapping and allocation of costs and resource consumption for hardware, software, labor and services from the source down to the applications and services they develop, deliver, and support. Benefits of leveraging TBM include:

1. Providing line-of-sight of CFPB technology priorities into the budget

2. Presenting a best practice, industry standard set of metrics for assessing IT cost and performance
3. Enabling improved benchmarking of technology investments across industries and within the federal government
4. Ensuring alignment with OMB standards for IT investment reporting.

As the Bureau continues to develop and mature its view of information resources and technology using the TBM taxonomy, additional standardized metrics and benchmarks will be included into the Bureau IT dashboard to supplement the FITARA Scorecard to further demonstrate the performance and value of Bureau information management resources.



# 5. Open Data Plan

The CFPB is a data-driven agency that collects and analyzes a wide variety of data in order to execute its mission and provide value to consumers. As such, the CFPB also recognizes and appreciates the importance of transparency and engagement with the public, and proactively makes its data assets available on its website. Under the OPEN Government Data Act (OGDA), the CFPB is required to publish an open data plan that addresses the implementation of the OGDA. The Financial Data Transparency Act of 2022 further highlights the importance of such collaboration by requiring the establishment of data standards that include a common legal entity identifier and other best practices. The CFPB's efforts will promote innovation, help identify which data are most useful to stakeholders, and improve internal understanding of the public demand for its data products.

The CFPB's Office of the Chief Data Officer (OCDO), led by the CFPB Chief Data Officer (CDO), is responsible for implementing the OGDA and must also submit an annual report to Congress regarding agency compliance. The OCDO is also responsible for leading the CFPB's Enterprise Data Strategy, which provides a shared roadmap to improve CFPB data management, increase staff learning, awareness, and knowledge about data, modernize our data environment, and serve the needs of the public through increased transparency and access to CFPB data and information.

As part of the requirements for an Information Resources Management Strategic Plan, the CFPB's *Open Data Plan* will address the OGDA's requirements as listed in the statute and will include a forward-looking component. The CFPB intends to update this plan annually, as required by statute, and will incorporate forthcoming finalized Office of Management and Budget (OMB) Phase 2 Guidance after issuance.

# 6. OGD A Open Data Requirements

Per the OGD A's requirements, the CFPB's *Open Data Plan* describes its efforts in six categories (addressed in the order presented in the statute).

## 6.1 Data Collection Mechanisms

The majority of CFPB's data collections are in an open format per the OGD A requirements. For example, the Home Mortgage Disclosure Act submissions are required to be in pipe-delimited plain-text format. Likewise, Prepaid Account Agreements, Terms of Credit Card Plans, Credit Card Agreements, and College Credit Card Marketing Agreements are also collected in an open format via utilization of the Collect system and/or the requirement for document uploads to be in a text-searchable, digitally created PDF format.

The CFPB plans to assess the remaining data collection mechanisms and will use its findings to develop a plan to fully implement this OGD A requirement, pursuant to forthcoming OMB Phase 2 guidance.

## 6.2 Collaboration with the Public

The CFPB regularly engages members of the public, industry groups, financial institutions, product vendors, and researchers with the goal of increasing utility of the CFPB's data-related publications and expanding their use. In addition, the CFPB has established a public-facing [OCDO mailbox](#), where the public is able to submit data-related inquiries and comments, and has a well-developed [data and research](#) web presence. The CFPB will use feedback from this mailbox to inform future efforts and will continue its public engagement activities going forward. For example, the CFPB plans to co-sponsor an Open Data Roundtable, a public event with a non-profit organization slated for FY24 which focuses on improving the effectiveness of CFPB core data assets and ensuring that these datasets can address major equity issues.

In early 2022, the OCDO, in partnership with the CFPB's Chief Technology Officer, conducted moderated usability testing, focused on the utility of the CFPB's website with respect to data access, with members of the public, including academic researchers, data scientists, policy

researchers, and web designers. This testing led to discoveries around potential improvements in the search, navigation, labeling, and data retrieval, and helped inform the creation of the CFPB's [Public Data Inventory](#) page. The CFPB plans to continue such usability testing and use the feedback to make improvements to the inventory.

The CFPB's Consumer Education and External Affairs division regularly conducts outreach to the public, trade groups, and companies for feedback related to the Consumer Complaint Database. The Consumer Education and External Affairs division also solicited input from external stakeholders via a request for information (RFI) to better understand data users' needs and held meetings with external stakeholders to improve the CFPB's understanding of how published financial education data is utilized.

Financial Education, a program office within the Consumer Education and External Affairs division, conducts research to understand consumers' financial education needs, their goals, and what forms of financial education work best, for whom, and under what circumstances. It developed, validated, and tested the [Financial Well-Being Scale](#) to reliably and consistently measure how people feel about their financial security and freedom of choice. It is grounded in a person's day-to-day financial experiences, as well as how their individual circumstances impact their ability to meet personal financial goals. It also conducts webinars, symposiums, and conferences to promote its data to broader communities, and gathers feedback from stakeholders serving the public.

Additionally, the CFPB's Office of Research conducts a research conference every 18 months that includes sharing findings and insights from CFPB data products, soliciting feedback and ideas to enhance current and future research efforts, and facilitating expanded use of CFPB data.

## 6.3 Data Asset Usage Evaluation and Point of Contact

The CFPB collects and analyzes public data asset usage on an annual basis, and this activity is reflected in the [Annual Performance Plan Report and Budget Overview](#) on the CFPB's website. This report identifies the number of internet pageviews and downloads of CFPB data releases and publications.

In addition, public data asset usage information is collected and analyzed via an internally facing web analytics page which counts external visitors to CFPB's many webpages within the last 90 days, shows mobile vs. desktop usage, identifies different search browsers being utilized, and indicates which operating systems are being used.

The [OCDO mailbox](#), referenced above, serves as the data point of contact for the public and is used to respond to quality and usability concerns, field recommendations and complaints about data-related items, and is actively managed by OCDO staff who respond in a timely fashion. Summary stats and visualizations are reported up through OCDO leadership on a quarterly basis for awareness and further evaluation, if warranted.

## 6.4 Data Quality Evaluation and Improvement

The CFPB adheres to the OGDAs requirements around timeliness, completeness, consistency, accuracy, usefulness, and availability of open data assets primarily through the efforts of data- and subject matter experts located in the CFPB program areas most closely associated with each data collection and publication. These efforts are assisted by data advisory body members.

For example, in the pre-collection phase, program area experts work closely with the CFPBs Paperwork Reduction Act compliance function to garner public input related to numerous data quality dimensions, such as timeliness, accuracy, credibility, and granularity.

As data is collected, some CFPB data collection systems evaluate and enforce data quality measures through automated validation rules and reporting procedures, signaling to data providers when data elements have been flagged for inconsistent quality or completeness.

Currently, post-collection, many CFPB program areas rely upon subject matter experts to review, cleanse, validate, and appropriately employ data in their products. For example, researchers within the CFPBs Office of Research utilize sound statistical and modeling techniques to ensure adherence to data quality domains, such as utility, objectivity, and integrity. The Bureau will look to these best practices to establish a more consistent process for adhering to these statutory requirements.

## 6.5 Technology, Training, and Procurement Standards to Facilitate Innovation

The CFPBs Office of Finance and Procurement has been instrumental in partnering with OCDO and the Office of Technology and Innovation to procure quality professional services and technology products in support of open data initiatives. These procurements are directly interwoven into the Enterprise Data Strategy in multiple campaigns around increasing external

data publication, building a modern data platform, enabling quality research and analysis, increasing awareness and knowledge about data, and fostering data literacy.

For example, contractors currently provide program management support in the development and execution of the Enterprise Data Strategy, collaborating with CFPB leadership and staff to develop workstreams, deliverables, and outcomes focused on facilitating the CFPB's open data journey.

Additional procurement vehicles have been awarded to provide senior technical support related to modern analytical tools and platforms, including support for an FY23 data catalog procurement initiative, for which CFPB leadership approved and allocated funding.

In addition, the CFPB is in the process of evaluating data upskilling options to be included in workstreams related to the Enterprise Data Strategy data literacy campaign, which could include training and support in data management, data governance, data science and analytics, and data visualization. Such trainings would be focused on closing any skills gaps identified via internal assessment.

## 6.6 Priority Data Assets, Data Inventory, and Federal Data Catalogue

The OCDO partnered with CFPB program offices to identify the CFPB's priority data assets for publication. This included reviewing all items captured in the CFPB's existing data catalog (established in 2017 and continually updated), engaging data stewards, and working with stakeholders to determine which assets were available and appropriate for disclosure as open data assets. This resulted in the identification of eight priority data assets, which were already available on the CFPB's website, to include in the [federal data catalog](#). CFPB's priority data assets cover topics such as consumer complaints, financial well-being, mortgage data, and a variety of credit card and prepaid product datasets:

- Consumer Complaint Database
- Financial Well-Being in America (2017)
- Home Mortgage Disclosure Act Public Data from 2007-2017
- Home Mortgage Disclosure Act Public Data (Starting in 2017)
- Credit Card Agreements Database
- College Credit Card Marketing Agreements Data
- Prepaid Product Agreements Database
- Terms of Credit Card Plan Survey

These eight priority data assets were also included among the 16 items (which included non-priority assets) initially published on the CFPB's [Public Data Inventory](#) webpage, established in April 2022 to serve as a one-stop shop for consumers to locate the CFPB's public data assets.

As part of the Enterprise Data Strategy, the OCDO is developing a framework with the Office of Research to facilitate identification of future open data assets to build a sustainable publication pipeline.

In addition, special care must be given by agencies to mitigate risks associated with disclosure of information, such as reidentification risk related to personally identifiable information (PII) or the inadvertent disclosure of sensitive data. To that end, the CFPB has taken appropriate steps, such as using technology that scrubs information that should not be published, which includes two levels of manual review, or working with internal staff and external vendors to perform disclosure avoidance techniques on data files proposed for release.

The CFPB plans to procure a new data catalog tool in the coming year. This modern catalog will offer more advanced capabilities to better enable the CFPB to meet the OGDA's requirements pertaining to comprehensive data inventories and metadata capture, pursuant to forthcoming OMB Phase 2 guidance.

# 7. Looking Ahead

In anticipation of finalized OMB Phase 2 Guidance, the CFPB will continue to evaluate its Enterprise Data Management Program to identify opportunities to mature its data management capabilities and increase transparency and accessibility of CFPB data assets to the public. In alignment with the OGDA and the CFPB's mission to educate and empower consumers making financial decisions, in the first year of the Enterprise Data Strategy, the CFPB is prioritizing its efforts to increase publication of data externally. This includes identifying ways to increase access and quality of CFPB data for staff, the public, and other federal agencies while protecting the privacy of individuals and organizations and securing protected information from misuse and unauthorized access.

In addition, the CFPB plans to complete its assessment of data collections to determine whether open formats are utilized and available, and for future collections, will examine ways to ensure open formats are the default for data submissions. In addition to current methods of public engagement, such as the Paperwork Reduction Act process, the OCDO mailbox, usability testing, and program office-led interactions, the CFPB will continue to find ways to seek input from the public. This could include roundtable sessions focused on increasing utility of public data assets, identifying data coverage gaps, and examining the possibility of improved presentation of data and information in more visually appealing ways, among other potential ideas.

# APPENDIX A:

**TABLE 2:** KEY TERMS AND ACRONYMS

<b>Term/Acronym</b>	<b>Definition</b>
API	Application Programming Interface
CDO	Chief Data Officer
CTO	Chief Technology Officer
RFI	Request for information
CFPB	Consumer Financial Protection Bureau
CIO	Chief Information Officer
CPIC	Capital Planning and Investment Control
ERM	Enterprise Risk Management
FedRAMP	Federal Risk and Authorization Management Program
FISMA	Federal Information Security Management Act
FITARA	Federal Information Acquisition Reform Act
FY	Fiscal Year
GAO	General Accountability Office
IRM	Information Resources Management
IT	Information Technology
OCDO	Office of the Chief Data Officer
OGDA	Open Government Data Act
OGR	Oversight and Government Reform
OKR	Objectives and Key Results
PaaS	Platform-as-a-Service



<b>Term/Acronym</b>	<b>Definition</b>
SaaS	Software-as-a-Service
SASE	Secure Access Service Edge
T&I	Technology & Innovation
TBM	Technology Business Management
ZTA	Zero Trust Architecture
DevSecOps	Development, Security & Operations
OMB	Office of Management and Budget (OMB)