

Recommended Policies and Guidelines for Federal Public Websites

Final Report of the Interagency Committee on Government Information

Submitted to The Office of Management and Budget

June 9, 2004

SUMMARY OF RECOMMENDATIONS

- 1. Citizens must be able to identify official federal government websites and trust that those websites will provide current and accurate government information. Federal public websites must use government domains, show U.S. sponsorship, follow basic common linking practices, and be current.
- 2. Federal public websites must be written and organized from the audiences' point of view. Content must be organized in ways that make sense to citizens and intended audiences. Homepages must be written and organized from the viewpoint of the public, and federal public websites should not be used for employee information. Federal public websites must use basic common content, terminology, and placement. Organizations must measure customer satisfaction and usability of federal public websites.
- 3. Federal public websites must be designed and written to ensure they are easy to access and use. Federal public websites must provide easy access, be written in plain language, have consistent navigation, have a search engine, and use standard metadata. Federal public websites should provide access to documents in appropriate file formats and provide appropriate access to data. Organizations must inform audiences of website changes and ensure continuity of operations during emergencies.
- 4. To promote seamless government, federal organizations must work to simplify and unify information across the government. Federal public websites should avoid duplication and link to appropriate government-wide portals. Organizations should collaborate in developing government-wide portals. Federal public websites must link to FirstGov.gov and link back to the website's homepage from every subordinate page.
- 5. Federal organizations must establish priorities and a schedule for posting content on their public websites. Agencies must comply with Section 207(f)2 of the E-Government Act of 2002.
- 6. Organizations must continue to comply with existing federal laws, regulations, and policies. Existing requirements include: privacy; security protocols; accessibility; Freedom of Information; information quality; limited English proficiency; paperwork reduction; paperwork elimination; records management; digital rights, copyright, trademark, and patents; performance results; No Fear Act; small business paperwork relief; restrictions on lobbying; scheduling content to be posted; and categorizing information.
- 7. Developing web content policies and requirements for federal public websites is an ongoing process, requiring structure. The Office of Management and Budget (OMB) should establish a Web Content Advisory Council, create processes to approve common content and links and to coordinate cross-agency portals, and require agencies to report progress and compliance with web content policies and requirements.

BACKGROUND

Interagency Committee on Government Information

The Interagency Committee on Government Information (the ICGI) was established on June 17, 2003, by the Office of Management and Budget, as required by Section 207 of the E-Government Act of 2002 (Public Law 107-347, 44 U.S.C. Chapter 36). The ICGI established several workgroups to make recommendations related to Section 207 which concern access to, dissemination of, and retention of federal information. The ICGI tasked the Web Content Management Workgroup to make recommendations on issues related to federal public websites.

The Web Content Standards Working Group

The ICGI tasked the Web Content Standards Working Group (subsequently referred to as "the Working Group") to develop recommendations to address requirements of Sections 207 (f) 1 and 2 of the E-Government Act. These sections require that, by December 31, 2004, the Director of the Office of Management and Budget (OMB) will issue "standards for agency websites," and that agencies will "establish priorities and schedules" for posting content on their public websites.

This report reflects recommendations developed by the Web Content Standards Working Group to meet these requirements. The recommendations have been reviewed and approved by the ICGI Executive Steering Committee for submission to OMB.

The ICGI and the Working Group recommend that OMB sanction each proposal in this report, either by issuing it in an official transmittal or by endorsing it as part of the Web Content Management Toolkit website. The ICGI further recommends that these proposed policies and guidelines also apply to requirements of Section 207(g)(3)(b) of the E-Government Act, which calls for policies to "improve dissemination of the results of research performed by Federal agencies and federally funded research and development centers."

Goals

The primary goal of the proposed policies and guidelines is to make U.S. government websites the most citizen-focused and visitor-friendly in the world.

The Working Group operated under two important principles:

- 1. All federal public websites—whether they are intended for citizens as a whole; intended for specific groups of citizens such as scientists, residents of a military base, or business partners; or both—should operate under common content policies and requirements that make them as visitor-friendly as possible, both individually and collectively.
- 2. Though many federal public websites are intended for specific groups, when a website is available to the public and is funded by tax dollars, then citizens—as a whole—are also an audience. They deserve certain basic information: who owns the website, its purpose, how it serves the public, and how they can find out more—all presented in terms they can understand. These recommendations will help ensure that every federal public website addresses the needs of citizens as a whole.

Scope

All of the recommendations are focused on the content of federal public websites, including how those websites are organized. These are not technical requirements.

While the scope of the recommendations of the Working Group was limited to federal public websites in the Executive branch, many of the policies, requirements, and guidelines proposed also are appropriate for extranets, intranets, and other parts of the federal government.

Since other ICGI Working Groups are addressing specific requirements and guidelines for categorization of information, electronic records, and a public domain directory, we have not attempted to address those subjects in this report. We have incorporated place-holders in these recommendations for policies, requirements, and guidelines resulting from their work.

Working Group Composition

The Working Group includes 22 web content managers and others who work on federal public websites. All Cabinet-level agencies were invited to designate a member. Working Group advisors also are web content managers and others who work on federal public websites. Advisors were selected because they have expertise in specific areas, including usability, information architecture, library science, depository libraries, records management, program management, and Freedom of Information Act requirements. *Attachment A* lists members and advisors.

Definitions

This report recommends policies and requirements for all federal public websites, at any organizational level, including cross-agency portals. We have defined "federal public websites" as any website that meets these three criteria:

- Is funded and sponsored entirely by the federal government,
- Presents official government information, and
- Is available to the public without passwords or log-ins.

We have specified exceptions where appropriate.

Throughout the report, we use the words "citizens" to refer to the people who are served by the United States government. We use the term "public" when we talk about the broader group of people—worldwide—who use federal public websites. We use the term "visitors" to refer to individuals who use a website. We use the term "organization" to refer to any official federal government organization, at any level.

Section 207(f)(1) uses four different terms to describe desired outcomes: "standards," "guidelines," "requirements," and "goals." The recommendations in this document are for policies, requirements, and guidelines. In most cases, they would not meet the definition of "standards" because they could not be audited.

When we use the word "must" in a recommendation, we mean that OMB should require the practice. When we use the word "should," we mean the practice is a guideline that, while not mandatory, will produce positive results in making a website more citizen-focused and visitor-friendly. *Attachment B* lists definitions of other terms used in this report.

Process

The ICGI Working Group developed the recommendations in three ways. First, we compiled web content requirements in existing laws, regulations, Presidential directives and other official documents. Our objective was to create one listing for all existing web content requirements. Where there already is implementation guidance for these requirements, we have cited it. Second, we reviewed current federal public websites and identified common practices that promote usability and good customer service. Third, we wanted to invite citizens to suggest ways to improve federal public websites, so we solicited suggestions through a comment form on the FirstGov.gov website.

After the Working Group finished the first draft of the recommendations, and it was reviewed by the ICGI, the Working Group sent it to a group of colleagues, stakeholders, web content experts, and other interested parties listed in *Attachment C*. We also posted it on the ICGI website. We received more than 100 sets of comments during the 3-week informal vetting period, and we reconsidered each recommendation, based on the comments. Most of the comments were favorable. Many of the comments requested clarification. Several comments helped us identify exceptions. A summary of the comments is available on the ICGI website at: http://www.cio.gov/documents/ICGI.html.

After revising the draft based on the comments, the Working Group presented the report to the ICGI Steering Committee. The Steering Committee made some minor changes. This report reflects the final recommendations on web content standards from the ICGI to OMB.

Implementation

For each recommendation, we have suggested an appropriate implementation deadline:

- Implement immediately: These are requirements that are based on existing laws, regulations, and other official documents, where implementation already should have occurred;
- Implement by December 31, 2004 for requirements to address Section 207(f)2 of the E-Government Act:
- Implement by December 31, 2005: These are requirements that already are common and that have little or no significant costs;
- Implementation by December 31, 2007: These are requirements that will take time or funding or both. This deadline should give organizations ample time to include implementation costs in their information technology budget cycles.

Under each recommendation, we have provided the rationale and basic guidance on implementation.

During the next three months, the ICGI Working Group will develop a **Web Content Management Toolkit** website on FirstGov.gov. The website will include: examples and "best practices" showing how to implement each requirement; resources; and additional guidelines for making federal public websites citizen-friendly. As other ICGI Working Groups complete their recommendations, we will incorporate those additional requirements, along with guidance on implementation. The website will serve as a toolkit for federal web content managers and others who want to learn about web content management. The Working Group also will conduct further usability testing on recommendations for common terms and locations of content. Results will be documented on the Toolkit website.

After OMB acts on these recommendations, the Working Group plans to hold a **Web Content Managers Workshop** in Washington, DC, to discuss implementing the new policies, requirements, and guidelines.

IMPORTANT ISSUES FOR OMB TO CONSIDER

We want to highlight several issues that have an impact on the success of these recommendations.

- 1. Implementing some of these policies and requirements will be challenging. During the informal vetting process, we heard from many colleagues and stakeholders that funding, staff resources, organizational culture, and "political will" all are factors that will affect their implementation. The funding and staff resources issues, in particular, are legitimate and should be addressed by OMB and the agencies.
- 2. In some cases, web content managers are reluctant to move toward standard requirements imposed on all federal public websites—they prefer to establish their own requirements, based on the needs of their organizations and intended audiences. The Working Group weighed these concerns as we debated each of the recommendations. We believe that, with the vast number of federal public websites, some basic common practices will help citizens be more successful in using all federal public websites. This is an important principle. It will take strong and consistent leadership from OMB to continue the movement toward commonality and ongoing education and support to help federal web content managers achieve that objective.
- 3. This should be the first step in an ongoing process to raise the level of quality and effectiveness of federal public websites. We recommend that a permanent Web Content Advisory Council—composed primarily of federal web content managers—be established to support OMB and all agencies by researching and recommending new or changed policies and requirements for federal public websites, identifying resources and opportunities to help federal web content managers make their websites more citizen-friendly, helping OMB coordinate cross-agency portals, and managing the Web Content Management website.
- 4. While the ICGI and the Working Group attempted to consider all aspects of each recommendation and to identify appropriate exceptions, there may be other legitimate exceptions. We recommend that OMB adopt the same requirements used to grant exceptions to the prohibition of permanent "cookies:" agencies must document a "compelling need" and the agency head must approve the exception in writing.
- 5. In the last few years, both Congress and certain federal agencies have established requirements for web content, including specifying the names and locations of links that must be included on every federal website. While the intentions may be good, the result is not always the best for citizens. In fact, so many links have been required that some federal website homepages have become cluttered and confusing to citizens.

Usability testing is the best way to select names and locations of links. A link location might work well on one website and not on another because the organization of every homepage is different. Links must be evaluated within the context of each website, considering its mission and intended audience. Requiring common names and placement of links, then, should be done only after thoughtful review of the impact on the usability of all the websites subject to the requirement. We recommend that OMB establish a process for evaluating requests for required names and links,

- using the Web Content Advisory Council, before imposing new requirements or allowing other agencies to impose requirements.
- 6. The ICGI, Working Group, and many of those who submitted comments on these recommendations think we need strong guidelines to ensure that historical documents posted on federal public websites during each political administration remain available to the public. Researchers, students, librarians, elected officials, and others use federal public websites to read speeches, testimony, management plans, official reports, and other documents issued by current and prior administrations and published on our websites. This issue has been referred to the Electronic Records Working Group for further consideration.
- 7. The ICGI and Working Group are concerned about enforcement. To paraphrase one commenter, if these requirements have no "teeth," organizations will ignore them. Though we discussed a possible certification process, our only recommendations related to enforcement are that agencies report on their implementation of these requirements and guidelines in their annual reports to OMB, required by Section 202 of the E-Government Act of 2002, and that all organizations must evaluate customer satisfaction and usability of their websites.

CONCLUSION

For each recommendation, our final test was this: Is this the right thing to do for citizens? If it is, then we need to find a way to do it.

RECOMMENDATIONS

- 1. POLICY: CITIZENS MUST BE ABLE TO IDENTIFY OFFICIAL FEDERAL GOVERNMENT WEBSITES AND TRUST THAT THOSE WEBSITES WILL PROVIDE CURRENT AND ACCURATE GOVERNMENT INFORMATION. Authenticity, branding, and timeliness of federal public websites are critical to maintaining public trust.
 - a. Requirement: Federal Public Websites Must Use Government Domains. Every federal public website must be established in the .gov, .mil, or fed.us domain to communicate to the public that these are websites that they can trust to provide official government information. This requirement applies to any federal public website, even if that website resides on a non-federal government owned server.

Exceptions:

- Agencies that are quasi-governmental;
- Federal websites that are developed in partnership or through grants with non-federal organizations, where content is not exclusively official federal government information; and
- Federal kids websites that agencies choose to put in the kids.us domain.

Rationale: Many websites exist that resemble government websites or that appear to provide "official" government information. They can mislead the public into believing and acting on erroneous information.

Visitors looking for official government information must be confident that is what they are getting. The federal government must ensure that public websites are clearly branded. Using domains that are exclusive to the government is one way to communicate to citizens that federal public websites are legitimate.

The .mil, .gov, and fed.us domains are restricted to government agencies. Using these exclusive domains assures the public that these are official government websites and that a government agency is accountable for the website's content. Using these exclusive domains also will ensure that the FirstGov search engine will find all official federal websites and that the FirstGov directory of federal public websites will list them.

- Organizations must register their websites in the .gov, .mil, or fed.us domain and follow existing domain registration policy and procedures under 41 CFR Part 102-173
 (http://www.dotgov.gov/final_rule_102.html) and Defense Data Services Management Bulletin 9605 24 September 1996.
- Some organizations that have been using and have publicized other domains (such as .edu, .org, and .com) may retain those domains and domain names, using them as an "alias."

 However, those organizations must register a .gov, .mil. or fed.us domain as their official domain; and they must host their content on the official domain. They can use an automatic redirect from the alias to the official domain.
- Websites established after these requirements go into effect must use the .gov, .mil, or fed.us domains.

 The Web Content Management Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: Immediately, for new websites. December 31, 2007, for existing websites.

b. Requirement: Federal Public Websites Must Show U.S. Sponsorship. Every federal public website must clearly display the name of the agency or organization that sponsors the website on every web page. If the agency or organization title does not include "United States," then the web page must show other wording to indicate that the U.S. government sponsors the website.

Exceptions:

- Pages or files reprinted from outside sources are exempted.
- PDF files are exempted.
- Cross-agency portals do not have to show the name of each agency on each page; however, they must include wording to show U.S. sponsorship

Rationale: Visitors want to be sure that they are getting official government information, when that is what they seek. Agency or organization titles alone do not always convey that they are part of the U.S. Government. Therefore, it is important to use "United States" or "U.S." if it is an official part of the agency or organization's name. If it is not, it is important to convey in some other way that the U.S. Government sponsors the website.

Sponsorship must be noted on every page because visitors do not always come through the "front door." Many visitors enter a website at a second, third, fourth, or lower level. Thus, it is important to ensure that visitors can identify the sponsorship of a web page, no matter where they enter the website.

Implementation Guidance:

- Websites must use one of the following practices to indicate sponsorship:
 - The full name of the agency or organization, including "United States" or "U.S."
 - The agency or organization's name AND a statement that this is an official U.S. government website (if the agency or organization name does not include "United States")
 - A logo that incorporates the official name of the agency AND sponsorship by the U.S. Government. If a logo is used, the name of the agency and U.S. sponsorship must be plain enough that visitors can recognize the words easily.
- Website homepages and major entry points must include a title tag with the agency's full name or a commonly accepted shortened version that the public will recognize. The organization name may precede or follow the page title in the title tag.
- Cross-agency portals must include wording on each page and in the title tag to show U.S. sponsorship.
- The Web Content Management Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2007

- c. <u>Requirement: Federal Public Websites Must Follow Basic Common Linking Practices</u>. Federal public websites must follow these requirements when linking to other websites:
 - (1) **Linking Policy**: Organizations must develop and post a clear and comprehensive policy for linking to other websites. Policies must include criteria or guidelines for selecting links to non-federal government websites. Linking policies must be available, at a minimum, from the website's "Web Policies and Important Links" page.
 - (2) **Notification**: Federal public websites *must* notify visitors when they are leaving the website for a non-federal government website. Federal public websites *may* notify visitors when they are leaving the website for another federal government website.
 - (3) **Disclaimers**: Federal public websites *must* disclaim responsibility for the content and privacy policies used by non-federal government websites. In the interest of seamless government and maintaining the general public's trust, federal public websites *must not* disclaim responsibility for the content of other federal public websites.
 - (4) **Review:** Organizations must review external links on an established schedule to make sure they still work and that they are still appropriate. The schedule must be included in the linking policy.

Exceptions: Organizations are not responsible for maintaining links contained in documents or reports belonging to another organization or entity that are republished on the website.

Rationale: Linking to outside websites — both federal and non-federal — can add real value to a website, but organizations must manage links effectively.

- The public needs to know how an organization chooses its links.
- Links need to work, and they need to lead the visitor to additional information related to a particular topic.
- Visitors expect federal public websites to take them to other websites that will be helpful.
 Web content managers of federal public websites have a responsibility to their visitors to ensure that they select links that fulfill that expectation.
- Linking to other websites reduces duplication of content. Content should be posted once by agencies with the greatest expertise and used by other agencies and portals, through links.
- All federal public websites must meet certain requirements mandated by laws, regulations and policies; therefore, it is safe to send a visitor to another federal public website, without a disclaimer. Moving from one federal public website to another should be as seamless as possible.
- When sending a visitor to a non-federal website, owners of federal public websites have a
 responsibility to inform visitors that the website they are going to does not necessarily
 operate under the same laws, regulations, and policies as federal websites.
- Linking to another website is valuable since it brings additional visitors to the website. Web
 content managers of federal websites must have clear and fair criteria for deciding which
 links they will use, particularly when they are asked by another website owner to establish or
 trade links.

- Agencies must establish a process and schedule for reviewing existing links to make sure that they work and that they still add value. Organizations should review links monthly or quarterly, at a minimum. Websites with a large number of external links, such as portals, should be reviewed more often.
- Options for notifying visitors that they are leaving the website include the following:

- Placing an icon next to the link;
- o Identifying the destination website in the link text or description itself;
- Inserting an intercepting page that displays the notification, after the user selects the link;
 and
- Displaying all non-federal links in a separate listing from federal links.
- Organizations may use the same notification process for links to federal websites.
- Organizations that currently disclaim other federal websites must remove disclaimers.
- Examples of linking policies, disclaimers, and link notifications will be available on the Web Content Management Toolkit website.

d. Requirement: Federal Public Websites Must Be Current. Every homepage, navigational page, and document on a federal public website must have a date showing that it is current, that it has been reviewed within the past 12 months, or that it is a historical document. Content that is obsolete and is not required by law or regulation should be removed or archived, in compliance with the organization's records management schedules.

Exceptions:

- If a document is reproduced from another entity and cannot be altered to add a posting date or notification that it is an historical document, it is exempt.
- Existing documents (not homepages or navigational pages) are grand-fathered; however, as time and resources permit, organizations should date those documents, too.

Rationale: Citizens, businesses, and other governments expect the information on federal public websites to be valid, accurate, and current. Researchers, media, students, and others need to cite dates.

- There are several options for implementing this requirement.
 - Date Posted: If the page or document has been posted within the past year, the "date posted" may be adequate. Documents older than one year may appear out-of-date. At that point, it would be advisable to go to a "last reviewed" date to show that the content remains current.
 - Date Last Modified or Updated: If the page or document has been modified or updated in the past year, the "date last modified" or "last updated" may be adequate. Again, content older than one year should be reviewed and the review date should be noted. Organizations do not need to change the date last modified or updated for corrections of spelling or typographical errors.
 - Date Last Reviewed: Unless a document is historical, if content is more than one year old, it should be reviewed. The date of that review can be used to show that the content is current.
 - Date Last Certified: Some agencies use a quarterly or annual certification process to ensure that all content is reviewed regularly. In that case, the date of the last certification can be used to show the content is current.
 - Historical Document: For pages or documents that will never change, such as news releases, official reports, final rules, etc., the date of publication can be used, along with a notation that this is a "historical document."
- It is not essential to put the date on every page of a document, though it is desirable.

- PDF documents should either be dated or the date should appear in the link to the PDF.
- Organizations should adopt a routine review process—monthly, quarterly, semi-annually, or annually—to identify obsolete content and remove it.
- The Web Content Management Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Date: December 31, 2007.

- 2. POLICY: FEDERAL PUBLIC WEBSITES MUST BE WRITTEN AND ORGANIZED FROM THE AUDIENCES' POINT OF VIEW. Websites must be written and organized from the point of view of the audience. When a website's intended audience is a specific group—scientists, residents of a particular military base, or business partners, for example—it also must include information for citizens, as a whole. When a website is available to the public and is funded by tax dollars, then citizens—as a whole—deserve certain basic information: who operates the website, its purpose, how it serves them, and how they can find out more—presented in terms they can understand.
 - a. Requirement: Content Must Be Organized in Ways That Make Sense to Citizens and Intended Audiences. Federal public websites must be organized by subject (topic, tasks, services, life events), by audience group, by geographic location, or by any combination of these factors, as the primary navigation. In some cases, federal public websites may include navigation based on organizational structure; however, that must not be the primary navigation structure of the website. Web content managers must analyze the wants and needs of both citizens and other intended customer groups when organizing the content of federal public websites.

Exceptions: There are no exceptions.

Rationale: Usability tests and customer satisfaction reviews indicate that most web visitors—both citizens and other audience groups—are familiar with navigating websites by subject, audience, or location. These are the preferred ways to organize a federal public website. Focus groups and other feedback indicate that citizens do not know—nor do they want to know—how the government is organized to get the information and services they want. Creating navigation according to organizational structure is not the best way to design a website for citizens. If a federal website is available to anyone, then citizens—as a whole—are part of the audience and the website must be organized in ways that help them use it.

- Web content managers should use a variety of means to determine the best way to organize information for citizens and other customers, including:
 - Usability testing and research;
 - Customer satisfaction surveys:
 - Focus groups:
 - o Email, phone calls, letters, and other contacts with the public;
 - Talking with intended audiences;
 - Talking with other web content managers; and,
 - Analyzing web reports, including search terms and statistics.

- Some federal public websites focus on special audiences, such as specific business partners or other government organizations. Using an organizational structure as a secondary navigation may be desirable when those intended audiences are familiar with that structure.
- Because audiences' needs change, testing and analysis should be an ongoing effort.
- The Web Content Management Toolkit website will provide more specific resources, including examples and best practices, to help web content managers implement this requirement.

b. Requirement: Homepages Must Be Written and Organized from the Viewpoint of the Public. The purpose of the homepage must be to help the public get to the content they need and want most. Homepages must be designed to feature the most requested information and services. Even if the public is not the primary intended audience of a website, the homepage must provide an easy-to-identify section where the purpose of the website and the value to citizens is explained in terms they can understand.

Exceptions: There are no exceptions to this requirement.

Rationale: Federal websites need to focus on helping the public find the services and information they want and need. The homepage is the main tool for sending visitors in the right direction. Web visitors want fast, efficient service. They want to find what they seek in the first screen. They do not want to be distracted by text or graphics that do not help them find what they want and that increase download time. Homepages must anticipate the wants and needs of the public. Homepage space, therefore, must be designed carefully and effectively to provide the very best customer service. Citizens—as a whole—are an audience for federal public websites funded by taxpayer dollars.

Implementation Guidance:

- Web content managers must assess their audiences' wants and needs to determine the content of the homepage. There are many options available to determine what audiences want and need
 - Customer satisfaction surveys;
 - Focus groups;
 - o Email, phone calls, letters, and other contact with the public;
 - Talking with intended audiences;
 - Talking with other web content managers; and,
 - Analyzing web reports, including search terms and statistics.
- Usability testing can help web content managers organize information in the most effective way.
- The most requested information should be featured prominently, including online services and public use forms.
- Homepages should not feature photos of executives or employees of the organization. Those photos may be appropriate on the "About Us" or "News" page.
- Additional guidance—including examples and best practices—will be provided on the Web Content Management Toolkit website.

Implementation Deadline: December 31, 2005

c. <u>Guideline: Federal Public Websites Should Not Be Used for Employee Information.</u>

Federal public websites should contain information and services for the public. As a rule, they should not be used to convey information specific to that agency's employees. Intranets or extranets should be used to inform employees.

Exceptions: In emergencies, federal public websites may be used to inform both employees and the public about the status of operations.

Rationale: The public can be confused by instructions intended for employees. As a rule, federal public websites should be aimed at the public—not at federal employees of that agency.

Implementation Guidance:

- If content specifically for employees exists on federal public websites, it should be moved to an intranet or to an extranet, with password protection.
- If the agency or organization does not have and cannot acquire an intranet or extranet, then
 employee information should be isolated and carefully labeled, to show the public that it is
 not intended for them.
- Additional guidance and examples will be provided on the Web Content Management Toolkit website.

Implementation Deadline: December 31, 2007

d. Requirement: Federal Public Websites Must Use Basic Common Content, Terminology, and Placement. Federal public websites must incorporate common content, including common terminology and placement where specified.

Exceptions: Exceptions are noted under each item below.

Rationale:

- Many citizens visit more than one federal website. Usability studies have shown that using common terms and placement of content can help visitors who go to multiple websites identify what they want more quickly and easily.
- Citizens expect to find certain basic information on every federal public website, including something about the organization, some way to contact the organization, quick answers to common questions.
- The E-Government Act of 2002 requires that certain content be available to citizens, including the mission, organization, and strategic plans of federal agencies.
- Recent laws and regulations have placed a number of requirements on all federal public
 websites, including privacy policies, links to FOIA pages, accessibility policies, "NO" data,
 and more. By using common terminology and placement of this information, citizens will
 know where to look for it on each federal public website.

Implementation Guidance: Requirements are provided under each specific item below. Additional guidance—including examples, best practices, and resources—will be available on the Web Content Management Toolkit website.

(1) **Contact information.** Federal public websites must have a page entitled "Contact Us" or "Contact (Organization Name)." That page must be linked from the homepage and every

major point of entry, using the page title as the link text. Contact information must include all of the following, at a minimum:

- Organization mailing address;
- Street addresses for any regional or local customer service offices;
- Phone number(s), including numbers for any regional or local offices or toll-free numbers and TTY numbers, if available;
- Means to communicate by electronic mail (for example, email address(es) or web-based contact form);
- The organization's policy and procedures for responding to email inquiries, including whether the organization will answer inquiries and the expected response time;
- Contact information to report data problems required by the Information Quality regulations,
- Contact information for small businesses, as required by the Small Business Paperwork Relief Act;
- Instructions on how to request information through the Freedom of Information Act (FOIA); and
- Contact information for reporting both technical and content problems with the website, including accessibility problems.

Exceptions: Organizations connected with national security, defense, and law enforcement may choose or be required to not include names, addresses, and phone numbers of offices and officials, including contact officials. However, they should provide some secure way for citizens to contact them.

Rationale: Citizens expect to be able to contact any federal government organization to ask questions, get information, or report problems. It is important to provide some means for them to do that.

Implementation Guidance:

- While the "Contact Us" link is required from the homepage and major entry points, it is desirable to include that link on every page.
- Organizations that need assistance in managing public inquiries should consult the USA Services Program, administered by GSA, which offers email, phone and publication distribution services.
- If TTY lines are not available, the agency can use the Federal Relay Service.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement, including examples of additional desired but not required—information, such as a searchable online "phone book," showing both phone numbers and email addresses of employees.

Implementation Deadline: December 31, 2005

- (2) **Organizational information.** Federal public websites must have a page entitled "About Us" or "About (Organization Name)." That page must be linked from the homepage, using the page title as the link text. The page must provide basic information about the sponsoring organization. At a minimum, it must include all of the following:
 - A description of the organization's mission, including its statutory authority (required by Section 207 (f)(1)(A)(i) of the E-Government Act of 2002);

- Strategic plan (required by Section 207 (f)(1)(A)(iv) of the E-Government Act of 2002);
- Organizational structure (required by Section 207 (f)(1)(A)(iii) of the E-Government Act of 2002);
- Basic information about parent and subsidiary organizations and regional and field offices, as appropriate;
- Name of the agency head and other key staff, as appropriate; and
- Contact information, as described in section 2d(1)

Exceptions:

- Cross-agency portals are exempt from all items except contact information; however
 portals should include a description of the purpose of the portal, its intended audiences,
 sponsorship, and any strategic plans for the portal.
- The Central Intelligence Agency and other agencies cited in Title 5, Part 1, Chapter 3, Section 306(f) may be exempt from posting strategic plans.

Rationale: The public, including students and researchers, often wants to know something about the organization that sponsors a public website. The E-Government Act requires specific information that must be included on all federal public websites, and several of these are appropriately categorized under "About Us." It will help visitors find this information if every federal public website puts it in that same category.

Implementation Guidance:

- Small organizations that do not have a specific mission or strategic plan should link back to the parent organization's mission and plan
- On kids' websites (other than kids.us websites), the "About Us" link can go to
 - o The parent organization's "About Us" page, or
 - An "About Us" page written for kids. If an organization chooses this option, the "About Us" page still must include a link to the parent organization's "About Us" page, for the benefit of parents who may want to know more about the sponsoring organization.
- Kids' pages developed in the kids.us domain may publish the URL of the parent organization's "About Us" page.
- Though the "About Us" link is required only on the homepage, it is desirable to include it on all major entry points.
- If possible, the organization chart should be interactive, allowing visitors to find additional details about components of the organization.
- The organization's mission and plans should be written or explained in terms that citizens can understand.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement, including examples of additional desired but not required—information, such as organization history and budget information.

Implementation Deadline: December 31, 2005

(3) **Site Map or Subject Index**. Every federal public website must have a page entitled "Site Map" or a page entitled "Subject Index" that gives an overview of the major content categories on the website. At a minimum, there must be a link to the Site Map or Subject Index from the homepage, using those words as the link text. Site Maps and Subject Indexes must be kept current so they are useful.

Exceptions: There are no exceptions to this requirement.

Rationale: The public needs to be able to find the information and services they seek, as easily as possible. Even on small public websites, a Site Map or Subject Index can give them a quick and easy way to find what they want. Usability testing on the terms "Site Map" and "Subject Index" show that the public understands these terms, so organizations must use them.

Implementation Guidance:

- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.
- Web content managers should establish a schedule or process for reviewing and updating the Site Map or Subject Index.
- A Subject Index will be most useful to visitors if it incorporates terms they commonly use.
 Web content managers should review common search terms and frequently asked questions to help construct a Subject Index.

Implementation Deadline: December 31, 2005

(4) **Common or Frequently Asked Questions**. Federal public websites must have a page for answers to frequently asked questions. That page must be linked from the homepage and every major entry point, using the title of the page as the link text. This page must provide basic answers to questions the agency receives most often.

Exceptions: There are no exceptions to this requirement.

Rationale: Though web content managers do their best to write and organize their websites to anticipate all questions, it is an impossible task. Visitors still have questions because they couldn't find something, because they didn't understand something, or because it isn't there. A list of answers to common questions can be a big help to the website audience.

- There are several ways for web content managers to compile a list of common questions and answers:
 - o Look at email, phone calls, and letters from the public
 - Conduct a survey
 - Arrange focus groups
 - Talk to the people who answer phones and mail at the organization
 - Look at statistics
 - Look at information requested under the Freedom of Information Act
 - Review top search terms
- Existing usability research shows the acronym, "FAQ," is not well recognized. "Frequently
 Asked Questions"—spelled out—is the most common terminology used, but there is no
 consensus on whether the public views it as the best terminology. The Web Content
 Standards Working Group will perform usability testing on preferred terms and placement of
 links to this page. In the meantime, organizations should avoid using the acronym.
- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.

(5) **Online Services**. Federal public websites must offer easy access to online services, displaying them as prominently as possible.

Exceptions: There are no exceptions to this requirement.

Rationale: Website visitors want self-service, and they want it fast. They want to know—right away—what they can do on the website to help them solve their problems or achieve their goals. Agencies can save time and money and by putting services online. To be effective for visitors, federal public websites must prominently display the most requested and most used online services, so visitors can find out what the website can do for them.

Implementation Guidance:

- Web content managers should identify the most commonly requested and commonly used online services on their websites and make sure that they are advertised prominently and can be reached quickly.
- As new online services are added to the website, they should be highlighted appropriately.
- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.

Implementation Deadline: December 31, 2005

(6) **Forms and Publications**. Federal public websites must offer easy access to public use forms and current publications and link to appropriate federal portals that offer forms and publications for the public.

Exceptions: The only exception to this requirement is a website for an organization that has no public use forms and publications.

Rationale: Website visitors want fast, easy service—24 hours a day, 7 days a week. They do not want to have to wait until an organization is open for business. They do not want to wait in line or on the phone to get forms and publications they need to accomplish their objectives.

Implementation Guidance:

- Public use forms and current publications should be available on federal public websites, or through links to portals, so that citizens can get them when they need them.
- Federal public websites that offer forms must link to related portals. Currently, fedforms.gov is the forms portal.
- Federal public websites that offer publications must link to portals that offer related publications. Currently, pueblo.gsa.gov and gpoaccess.gov are publications portals.
- If forms or publications or both are not available for viewing, downloading, or completing online, then—at a minimum—the website must provide instructions on how to order them.
- Access to public use forms and publications should be obvious on the website.
- Websites should provide public use forms in a fillable format, if possible.
- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.

Implementation Deadline: December 31, 2005

(7) **Jobs.** Agency websites must include information about jobs at the organization, along with a link to the USA. Jobs website.

Exceptions:

- Kids' websites are exempt.
- While a jobs section is a requirement for agency websites, it is a guideline for smaller websites.

Rationale: Job seekers and curious citizens want to know basic information such as what jobs are available, how to apply, and what it's like to work in federal organizations.

Implementation Guidance:

- In addition to the link to USAJobs, federal public websites for large, high-level organizations should include information about working at that organization, special jobs programs like internships and work-study, No Fear Act data, and other information particular to that organization.
- Though they may have unique circumstances, agencies staffed only by appointees, small organizations, and portals should also explain how jobs are filled.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this guideline.

Implementation Deadline: December 31, 2005

(8) **Information about Regulations.** Every organization that issues regulations must provide information about those regulations on its website and link to the "Regulations.gov" portal.

Exceptions: There are no exceptions to this requirement.

Rationale: The President's Management Agenda makes it a priority to inform the public about pending regulations and provide them an opportunity to be involved in rulemaking. It helps citizens to be more involved in their government.

Implementation Guidance: The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement.

Implementation Deadline: December 31, 2005

(9) **Information about Grants and Contracts.** Every organization that provides grants or has contracting opportunities must provide information about those opportunities on its website and link to appropriate cross-agency portals.

Exceptions: There are no exceptions to this requirement.

Rationale: The President's Management Agenda makes it a priority to standardize and automate the grants application process and to centralize federal contracting opportunities in cross-agency portals. All federal organizations must support those portals.

Implementation Guidance:

- Organizations that post grants information must link to grants.gov.
- Organizations that post contracts information must link to federal portal(s) with contracting information related to that organization.
- If an organization has significant grants or contracts available, it may be appropriate to showcase that information—or a link to that information—on the homepage.
- Web content managers should conduct usability studies to determine the best terms to use and places to locate this information
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement.

Implementation Deadline: December 31, 2005

(10) **Required Website Policies and Links:** To help visitors find website policies and links required by laws and regulations, federal public websites should use common terminology and placement.

Exceptions: The policies and links in this section are required by laws and regulations. The terminology and placement of required links and policies are guidelines.

Rationale: The more federal public websites that follow the same practices for naming and placing important information, the easier it will be for citizens to find that information as they move from one website to another.

- Federal public websites should have a page for **website policies and important links**. The recommended location for a link to this page is at the bottom of every page.
- Federal public websites must include a link to an organization's privacy policies on every page. (See item 6a for more details about this requirement.) The recommended name for that link is "Privacy Policy." The recommended location for that link is at the bottom of every web page and on the page containing website policies and important links. PDF files are exempt from this linking requirement.
- Federal public websites must provide the organization's **policies for accessibility** (see item 6c for more details about this requirement). The recommended location for this policy or a link to this policy is on the page for website policies and important links.
- Federal public websites must have a link from the homepage to the **Freedom of Information Act** page (see item 6d for more details about this requirement). The recommended name for that link is being tested, and the recommended locations are at the bottom of the homepage and on the page containing website policies and important links.
- Federal public websites must provide the organization's policy for linking to outside
 websites (see item 1c for more details about this requirement). The recommended location
 of this policy or a link to the policy is on the page containing website policies and important
 links.
- Federal public websites must inform the public about the digital rights, copyrights, trademarks, and patents policy (see item 6j for more details about this requirement). The recommended location of this policy or a link to this policy is on the page containing website policies and important links.
- Federal agencies must provide information required by the "No Fear Act" (see item 6l for more details about this requirement). The recommended name of this page is being tested.

- The recommended locations for links to this information are the "Jobs" page, if one exists, and the page containing website policies and important links.
- Federal agencies subject to the Paperwork Reduction Act must post their policies to
 implement the "Information Quality Guidelines" on their public websites (see item 6e for
 more details about this requirement). The required location for links to that information is the
 page containing website policies and important links. The "Contact Us" page must also
 include contact information to report data problems, as required by the Information Quality
 quidelines.
- Federal agencies must provide general information about their **security protocols to protect information** (see item 6b). The recommended location of this policy or a link to this policy is on the page containing website policies and important links.
- Federal agencies must post their schedule for publishing information on their websites
 required by Section 207(f)2. The recommended location of this schedule or a link to this
 schedule is on the page containing website policies and important links. (See Section 5 for
 more details about this requirement.)
- The Web Content Standards Working Group will conduct usability testing for the names and locations that do not already have supporting data, including a name for the page containing website policies and important links.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this guideline.
- If additional policies and links are required, the recommended Web Content Advisory Council will review them and recommend common names and locations.

e. Requirement: Organizations Must Measure Customer Satisfaction and Usability of Federal Public Websites. Organizations must evaluate customer satisfaction and usability of their websites and use the assessments to improve the websites. Federal public websites that reach the widest audiences—including agency websites and all second-level domain names registered in .gov, .mil, or .fed.us—must use a standard customer satisfaction survey.

Exceptions: There are no exceptions to this requirement.

Rationale: Organizations that create federal public websites, and the citizens they serve, want these websites to be as useful as possible. While web content managers do their best to write and organize their websites to be effective, they need to test their websites to identify problem areas and then fix those problems. A common customer satisfaction survey will reduce costs government-wide and compare government websites with each other.

- Web content managers must measure both the usability and customer satisfaction of their websites. There are a number of options for doing that, and they will be identified on the Web Content Management Toolkit website.
- Federal public websites that reach the widest audiences, including agencies' websites and all
 websites that are registered under a second-level domain in .gov, .mil, or .fed.us must use a
 standard customer satisfaction survey. OMB will select the survey through a competitive
 process.

 Agencies should include a summary of their customer satisfaction survey results in their annual report to OMB, which documents compliance with requirements from the E-Government Act of 2002. (See item 7d.)

Implementation Deadline: December 31, 2005

3. POLICY: FEDERAL PUBLIC WEBSITES MUST BE DESIGNED AND WRITTEN TO ENSURE THEY ARE EASY TO ACCESS AND USE. All federal public websites must be designed and written to ensure that the audiences for whom they are intended can easily access and use those websites. Organizations must consider the needs of a broad range of visitors, including (but not limited to) the general public, specialized audiences, people with disabilities, those without access to advanced technologies, and those with limited English proficiency. While organizations should ensure broad accessibility and usability, this should not limit them from providing information and services for specialized audiences, or from pursuing advanced technologies that will improve the website for future visitors.

Note: Requirements related to accessibility for people with disabilities and people with limited English proficiency are included in Section 5 of this document, which addresses existing laws, regulations, and other requirements.

a. <u>Requirement: Federal Public Websites Must Provide Common Access</u>. Federal public websites must be designed, developed, and tested for a broad range of visitors, including those with lower-end hardware and software capabilities.

Exceptions: There are no exceptions to this policy.

Rationale: To ensure that all citizens have access to U.S. government information and services, federal public websites should attend to the needs of a broad range of visitors, including those without reasonable access to advanced technologies. While more and more visitors have access to higher-end technologies, a significant percentage of the public still uses relatively low connection speeds, lower screen resolutions, and prefers a variety of different Internet browsers.

- Federal public websites should be designed, developed, and tested for multiple browsers and versions of browsers, operating systems, connection speeds, and screen resolutions, based on an analysis of an organization's website visitors.
- Organizations should balance the needs of visitors who use lower-end technologies with the need to pursue more advanced technologies and the added functionality those technologies may provide.
- Organizations should review visitors' technological needs at least semi-annually (using web analyzer tools or other analytic data) to ensure that websites continue to meet the needs of their intended audience. The Web Content Managers Online Toolkit will provide regularly updated data about public web use, but organizations are also encouraged to review data specific to their own website visitors.
- To accommodate visitors with low connection speeds, federal public websites should, to the maximum extent feasible, minimize page download times for their visitors. In most cases, HTML pages should not exceed 100 KB.

• Organizations should not use certain web design technologies (such as Flash) if their intended audience generally cannot and does not have access to those technologies.

Implementation Deadline: December 31, 2005

b. Requirement: Federal Public Websites Must Be Written in Plain Language. Organizations must ensure that—at a minimum—homepages, all major entry points, and navigational elements of federal public websites are written in plain language. Plain language is language the website's typical visitor can understand in one reading; it is writing designed for the reader. Organizations should assume that the intended audience for homepages is the general public.

Rationale: Writing in plain language—language designed for the intended reader—ensures that federal public websites communicate effectively. Poor writing that does not communicate effectively wastes the reader's time, often fails to achieve its purpose, and is poor customer service.

Implementation Guidance:

- Organizations should review their homepages, major entry points, and navigational elements to ensure they are written in plain language, considering the website's intended visitors. All organization homepages should assume that the general public is the intended audience.
- Organizations should use language tools, including language software, to evaluate the readability of the website's content.
- Organizations should test language with typical visitors.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2005

c. Guideline: Federal Public Websites Should Provide Access to Documents in Appropriate File Formats. Federal public websites should provide access to documents using open, industry standard web formats or using alternative formats that do not impose an unnecessary burden on the intended audience. Organizations should base their choice of file formats on both the needs of their intended audience(s) and the business needs of the organization.

Rationale: Presenting documents in open, industry standard formats allows universal access, since every person with a browser can read these and the full contents of these documents are easily retrievable using web search engines. Usability studies have shown that visitors can become frustrated and are less likely to access information that requires downloading with additional software or plug-ins, even if that software is freely available, because it involves extra time and effort to view the material. In addition, many proprietary files are so large compared to industry standard formats that visitors with slow connection speeds cannot download them. Certain software and plug-ins also pose difficulties for persons with (primarily) visual impairments.

Implementation Guidance:

When choosing file format(s), organizations should consider: (1) the intended use of the
material by the website's visitors; (2) the frequency of use by the website's visitors; (3) the
accessibility of the format to the website's visitors; and (4) the level of effort and time
required by the organization to convert the material to the format.

- In general, industry standard formats (HTML and XML are current examples) provide the greatest flexibility for visitors and should be the primary formats for documents on federal public websites, especially those that are most frequently accessed by the public.
- Portable Document Formats (PDF), such as Adobe Acrobat, should be used only as an
 alternate format to industry standard formats and when there is a clear business need to use
 this format. For example, PDF format is an appropriate format when it is important to retain
 the original formatting of a document, such as forms or brochures. When using PDF files,
 organizations must provide a link to the downloadable free viewer. To ensure maximum
 accessibility, organizations should also provide a version of the document in an industry
 standard format, such as HTML, whenever feasible.
- Organizations should avoid making documents available only in proprietary formats that
 require purchase or licensing of commercial software (for example, MS Word, MS
 PowerPoint). If organizations must use these formats, they must ensure that the intended
 audience is known to have ready access to the appropriate software or they must provide a
 link to download the appropriate viewer or plug-in.
- When linking to a document in an alternative format (such as PDF or MS Word), websites should include a text description of the document, including the name, file type, file size, and effective date (using one of the date options in Recommendation 1d). This will ensure that visitors have a reasonable understanding of what to expect when they view the material and that search engines can easily find it.
- In most cases, large or complex documents (generally, more than 10-15 pages), whether in an industry standard format or alternative format, should be organized into sections or chapters and linked together. Organizations should also provide a link to download the entire document since some readers may prefer to print the entire document for later reading.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this guideline.

d. Guideline: Federal Public Websites Should Provide Appropriate Access to Data. Federal public websites that provide material and data for downloading by the user for off-line analysis or manipulation should provide the data in open, industry standard formats or in alternative formats that do not impose a burden on the intended audience.

Rationale: Visitors to federal public websites need to be able to efficiently download available data in a format that allows them to effectively aggregate and disaggregate the data.

- When choosing the format(s), organizations should consider: (1) the intended use of the data by the website's visitors; (2) the frequency of use by the website's visitors; (3) the accessibility of the format to the website's visitors; and (4) the level of effort and time required by the organization to convert the data to the file format.
- Open files (raw data) provide the greatest flexibility for visitors and are generally preferred over proprietary formats that require specific commercial software.
- A proprietary format (for example, SAS, SPSS, SQL, MS Excel etc.) should be used only if the format provides functionality not otherwise available. If organizations must use these formats, they must ensure that the intended audience is known to have ready access to the

- appropriate software or they must provide a link to download the appropriate viewer, plug-in, or software.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this guideline.

e. <u>Requirement: Federal Public Websites Must Have Consistent Navigation.</u> To promote ease-of-use for all citizens, federal public websites must have a navigation scheme that is used consistently across the website.

Exceptions: There are no exceptions to this requirement.

Rationale: Consistent navigation makes websites easier to use because visitors don't have to learn a new navigation scheme on each new page. Visitors are more likely to get what they need from a website if they are familiar with its navigation scheme.

Implementation Guidance:

- Common items that appear on every organization page should, if possible, be in the same location on each page and have the same appearance and wording. A navigation item that is shared by a group of pages (such as a set of pages on a single topic, or for a division of the organization) should also have the same location, appearance, and wording on each page.
- Navigation items of the same type should also look and behave the same way. For example,
 if a set of pages on one topic has subtopic links in the left navigation bar, pages on other
 topics should also have subtopic links in the left navigation bar that look and behave
 identically.
- If a particular set of web pages requires specialized navigation, you should apply that navigation to the largest possible logical grouping (such as a topic, an audience, or a complete organizational unit).
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2007

f. Requirement: Federal Public Websites Must Have a Search Engine. Federal public websites must include either a "search box" or a link to a "search" page on every page. The search engine must allow visitors to search all files on the website that are intended for public use. Organizations must provide search results in an easy-to-read format, set minimum service level standards for their search capabilities, and monitor how well they are able to meet those standards.

Exceptions: Small websites, typically narrow in scope and under 200 pages, are not required to have a search engine and may find substituting a Site Map or Subject Index serves as well or better than a search engine.

Rationale: Visitors expect to have a "search" available since it is a standard feature on almost every website. Effective search functionality is critical for accessing the depth and breadth of information made available on federal public websites. This is especially true for information not readily accessed using the "browse" functionality, such as information located in organization

databases. In addition, Section 207(f) of the E-Gov Act of 2002 requires minimum goals related to search relevancy and speed of retrieval of results.

- Search box Federal public websites must include either a "search" box or a link to a "search" page from every page of the website. The search box or link must be entitled "search." Usability studies demonstrate that search boxes are most effective when placed in the same position on all pages (usually within the upper third of the webpage).
- Acceptable search engines Acceptable search engines include commercial search
 engines, search engines that operate as a web service (application service providers),
 search engines developed by the organization, or the FirstGov search, the free search index
 available at no cost to federal agencies.
- **Display of Search results** Search results must be displayed in an easy-to-read format that, at a minimum, shows visitors the term(s) they searched for and highlights the term(s) in each search result.
- Scope of Search Index Organizations must determine the scope of its search index to
 determine which content should be included and which content should be excluded.
 Organizations must ensure that existing content intended for use by the general public is
 made available using the website search engine, to the maximum extent allowable by the
 organization's search technology. This includes providing access to searchable public
 databases whenever feasible. Content that contains information not intended for the public
 should be excluded from the search engine index. Organizations must ensure that sensitive,
 restricted, or classified information or information that contains personally identifiable
 information (such as social security numbers) is not included in any web-based file that could
 be retrieved using a government-owned or commercial search engine.
- **Service level standards** Organizations must meet minimum service level standards for their search engines in the following areas:
 - Frequency of Search Indexing In most cases, organizations should index the content
 of their website(s) at least once a month. Content that is added and updated frequently,
 such as press releases, should be indexed more frequently; however, content that
 changes infrequently, such as archived or historical documents, may be indexed less
 often.
 - Response time On average, search engines should produce results in less than three (3) seconds. Organizations should monitor and log search response times and ensure that adequate hardware and software capacity is available to achieve the response time standard.
 - Relevancy Every organization should routinely identify the common search terms used on their website, evaluate the relevancy of their search results for those terms, and configure their search services to provide the best ranking possible. Organizations should conduct this review at least quarterly.
- "Advanced" or "Refined" Search Although usability research indicates that very few
 people use "advanced" search features, organizations should allow visitors to conduct more
 refined, focused searches to achieve more relevant results. For example, organizations may
 wish to provide options for searching within certain sets of information, databases, or
 applications.
- **Broader Searches** Organizations may also wish to provide options for broadening searches beyond the individual website. This may include a search of a "parent" organizational unit or a search of the entire federal government using the FirstGov search.
- Search Tips Given that many people are unfamiliar or unskilled at using search

- technology, organizations should provide help, hints, or tips, and include examples.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

- **g.** Requirement: Federal Public Websites Must Use Standard Metadata. Federal public websites must include the following metadata on the homepage and all major entry points:
 - Title (this is different from the HTML title tag)
 - Description
 - Creator (the content owner; this should be the name of the organization)
 - Creation Date (original creation date)
 - Last Reviewed Date
 - Language

Exceptions: There are no exceptions to this requirement.

Rationale: Metadata provides a standardized system to classify and label web resources. Metadata improves search relevancy, provides information about who created the information and when it was created, supports website maintenance and administration, helps create datadriven pages, and allows information to be tracked and assembled government-wide. Without quality metadata, the public cannot efficiently locate government information using search engines. Metadata should be applied on as many pages as possible so that both high-level pages and pages embedded deep within a website can be reasonably accessed.

The set of required metadata elements is based on internationally recognized Dublin Core standards, which are widely used by government and commercial websites, including all Government of Canada websites.

- Organizations should reference Dublin Core Metadata standards, which provide examples of appropriate metadata syntax for the required elements: http://www.dublincore.org/documents/dcmi-terms/#H2.
- If organizations choose to include additional metadata, they should choose from the Dublin Core standards.
- Organizations may choose to include subject and keyword metadata if they consider it
 helpful for improving search relevancy and for content classification within their organization.
 For subject and keywords to be most effective, organizations should use standard
 terminology (for example, thesauri, taxonomies, controlled vocabularies, gazetteers) and
 apply them consistently across the website.
- While organizations are required only to apply metadata to homepages and all major entry points, they are encouraged to include metadata on as many pages as is feasible, within resource constraints.
- Cross-agency portals should use the "creator" field to list the primary sponsoring agency or agencies who manage the website.
- The Web Content Standards Working Group (or the proposed Web Content Advisory Council) will coordinate with the ICGI's Electronic Records Policy Working Group and the Categorization of Information Working Group to continue identifying appropriate metadata for

- federal public websites, which will strengthen the federal government's ability to categorize government information and manage its web records.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

h. Requirement: Organizations Must Inform Audiences of Website Changes. When federal public websites undergo changes that may affect the public's ability to locate information on the website, the organization must help visitors locate information in the new format. When significant changes occur, such as a website redesign, the organization must provide information to the public about the changes. When changes are made to an organization's root domain name (for example, www.irs.gov or www.publicdebt.treas.gov), they must notify staff at FirstGov.gov so the new domain name is correctly identified on FirstGov, including the government-wide domain directory and search index.

Exceptions: This requirement does not apply to changes that do not affect the public's ability to locate information on the website, such as adding new features or sections to a website.

Rationale: Repeat visitors are familiar with a website's navigation and appearance and will get confused if a website doesn't explain changes that affect their ability to accomplish what they need. In particular, every visitor needs to know about changes to URLs that may affect bookmarks and other links to the website. Since many federal organizations link to each other, it's important to keep URLs current, or provide redirect pages, so content on other federal websites also stays current.

- Organizations should explore various ways of informing the public about changes to the
 website, both before and after changes have been made. The method for notifying the public
 should consider the magnitude of changes.
- Significant changes requiring notification may include:
 - Changes to an organization's root domain name, such as changing from <u>www.bcis.gov</u> to www.uscis.gov;
 - URL changes for frequently visited pages (such as those that occur when a page is removed, renamed, or placed in a different location within the website);
 - Major changes to the navigational or organizational structure of the website;
 - Website redesigns (complete change to a website's "look and feel" and navigation scheme).
- For website redesigns, organizations should include a notice on the homepage informing
 visitors about the new design and how it will impact their ability to find information. Recent
 research and usability testing indicates that full-scale website redesigns are not always as
 effective in meeting the needs of customers as making incremental changes, and thus
 should be undertaken after careful consideration.
- Organizations should minimize URL changes as much as possible, especially for frequently visited pages, since many websites may link to those URLs and those URLs may be bookmarked by many individuals. When organizations change their second-level domain name, they should insert a "redirect" notice that will automatically take visitors to the new URL. Since organization domain names are widely known and part of an organization's identity and branding, organizations should communicate any changes to as wide an

- audience as possible. In addition, organizations must notify staff at FirstGov.gov (with as much advance notice as possible), so the new URL is correctly identified in FirstGov's government-wide domain directory and in the FirstGov search index.
- For individual page URL changes, organizations should insert a "redirect" notice that will automatically take visitors to the new URL. When a significant number of page URLs change at one time (for example, as part of a redesign or conversion to an automated content management system), organizations should provide as many ways as possible for visitors to locate the new page locations.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: Effective immediately. Organizations should follow this requirement when the next major website change occurs.

i. Requirement: Organizations Must Ensure Continuity of Operations During Emergencies. Every organization must have procedures to address what it will do with its website during disasters or emergencies.

Rationale: The public depends on federal websites to get information and services and do business on a daily basis. Organizations need to plan how the website will communicate vital information during an emergency and what services will be available to the public.

Exceptions: There are no exceptions to this policy.

Implementation Guidance:

- Organizations should develop plans that will address what they will do with their website
 during disasters or emergencies. At a minimum, the plans should cover situations where
 websites may need to be taken off-line; procedures for bringing websites back on-line and
 ensuring system availability; procedures for updating, approving, and maintaining content;
 and the types of critical information that the public is expected to need most.
- Website plans should be documented in, and be consistent with, the organization's Continuity of Operations plans.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2005

4. POLICY: TO PROMOTE SEAMLESS GOVERNMENT, FEDERAL ORGANIZATIONS MUST WORK TO SIMPLIFY AND UNIFY INFORMATION ACROSS THE GOVERNMENT. The proliferation of information on the Internet, including information on federal public websites, can make it difficult for the public to sift through the maze of available resources, some of them overlapping and duplicative. Better coordination within and among federal organizations would limit the amount of duplication that currently exists and allow organizations to more effectively manage their resources. One of the best ways to accomplish this is by leveraging the resources of crossagency portals, which promote the principle that information and services are created once and used many times.

a. **Guideline: Federal Public Websites Should Avoid Duplication** Organizations should avoid duplicating or recreating content that already exists on a federal public website. Before creating new information on a particular topic, organizations should, to the maximum extent possible, determine if that same—or comparable—information already exists on their website or on another federal public website, including on a government-wide portal.

Rationale: The public can become confused when they find overlapping or inconsistent information on the same subject. The accuracy and quality of content will be improved if it is created once, where the greatest expertise exists, maintained thoroughly, and used many times. Decreasing duplication will also help organizations focus resources on web content within their mission area without duplicating content created by other mission areas. Identifying whether content already exists is less time-consuming than re-creating it.

Implementation Guidance:

- Before creating new content, organizations should use inventories of their own websites' content (as required in Section 207(f)(2) of the E-Gov Act) to determine if comparable content already exists.
- To determine whether content already exists on another federal public website, organizations are encouraged to use FirstGov.gov, the official portal of the U.S. government. FirstGov maintains and regularly updates a list of cross-agency portals, including portals about a particular topic or audience group (see:
 http://www.firstgov.gov/Topics/Cross_Agency_Portals.shtml). FirstGov also organizes government-wide content by subject and provides a government-wide search.
- When existing content is the same or comparable within organizations or across organizations, those agencies should consult with each other to find ways to share or coordinate content and to mitigate duplication.
- There may be situations where it is valuable for the public to have information on a particular topic from different sources. In these situations, organizations need to ensure that the multiple pieces of information are complementary rather than conflicting.

Implementation Deadline: Immediate

b. Guideline: Organizations Should Collaborate in Developing Cross-Agency Portals
Organizations should collaborate with each other in developing cross-agency portals to ensure they provide the breadth of information and services available across government about the particular topic or audience group. Cross-agency portals should be coordinated with OMB or the Web Content Advisory Council to ensure that they a) meet a defined business need; b) include all appropriate organizations; c) do not duplicate existing portals; and d) have sufficient resources to be sustainable. Sponsoring organizations should have a strategic plan to ensure cross-agency portals can be effectively managed over time.

Rationale: Cross-agency portals provide many benefits to the public and to the federal government by bringing together information and services from multiple federal organizations on a particular topic or audience group. These portal websites can improve the public's access to information and services, strengthen the quality of content, and provide cost and efficiency savings to federal organizations. But to achieve these benefits, organizations need to work together to develop cross-agency portals rather than developing them in isolation. If cross-agency portals are not managed effectively, the public may not be getting a full view of all available information and resources, even though they believe they are.

Implementation Guidance:

- Organizations should work in partnership to ensure that cross-agency portals provide value to citizens and that the content is managed effectively.
- Before developing and naming a new government-wide portal, organizations should coordinate with OMB or the Web Content Advisory Council, which will review and recommend appropriate action for proposed cross-agency portals. (See proposal in Section 7c).
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help organizations effectively develop and manage crossagency portals.

Implementation Deadline: Immediate

c. <u>Guideline: Federal Public Websites Should Link to Appropriate Cross-Agency Portals.</u> Federal public websites should link to appropriate cross-agency portals when applicable, to guide the public to additional resources that exist across the U.S. government.

Rationale: Links to cross-agency portals can supplement or replace the information on federal public websites. Links to other government information can guide visitors to additional resources to help them find what they need. This is especially important for federal public websites since many visitors do not know the organizational structure of the government and may need additional assistance to locate the information or service that best meets their needs. These links can also help ensure that visitors are being directed to the most authoritative, current source for the information, rather than having individual organizations attempt to keep the information accurate and up-to-date themselves.

Implementation Guidance:

- When a federal public website provides information on a particular topic or for a particular audience for which there is an appropriate, useful government-wide portal, the organization should link to the government-wide portal from its page(s) on that topic. A list of recognized cross-agency portals is provided on FirstGov.gov.
- As with all links, organizations should regularly review links to cross-agency portals to ensure they are current and accurate.
- When providing organizational information to visitors (for example, a list of all cabinet-level agencies or independent agencies), organizations should link to the organizational directory pages on FirstGov.gov, which provides a comprehensive listing of all federal organizations.
- To avoid confusion, organizations should not link to cross-agency portals unless those websites are related to the organization's mission or function.
- The Web Content Managers Toolkit website will provide more specific information, including a list of current cross-agency portals to which organizations should consider linking.

Implementation Deadline: Immediate

d. Requirement: Pages on Federal Public Websites Must Link to the Homepage. To improve usability, every page on federal public websites must include a link back to the website's homepage or to another appropriate, logical starting point.

Exceptions: PDF files are exempt from this requirement. Other file types that cannot physically contain a link are also exempt.

Rationale: Visitors often need to access a website's front page to choose other paths and to have another way of knowing where they are within a website. This helps both those who get lost and others who drill deeply into a website from a search engine or other source.

Implementation Guidance:

- Many people do not recognize that an organization's logo links to the homepage. If an
 organization uses a graphical link to a homepage, it must also include text indicating that it
 links to the homepage.
- Organizations may choose to include a navigational link to the homepage of a higher level organization within its hierarchy. For example, the FBI may choose to link to its parent organization, the Department of Justice.

Implementation Deadline: December 31, 2007

e. Requirement: Federal Public Websites Must Link to FirstGov.gov. Every federal public website must link from its homepage and major entry points to the homepage of FirstGov.gov (www.firstgov.gov).

Exceptions: There are no exceptions to this requirement.

Rationale: Section 204 of the E-Government Act of 2002 designates FirstGov,gov as the official web portal of the U.S. Government. FirstGov.gov serves as the "homepage" for the entire U.S. government by providing a topical and organizational directory of U.S. government websites and a government-wide search index. It promotes seamless government by allowing citizens to access the vast amount of information from across government without having to know which agency sponsors the information. In the same way that links to a homepage help people start browsing from a known location, this link will help people who aren't at the website of the appropriate agency find the government information and services they need.

Implementation Guidance:

- Organizations must link to FirstGov.gov. Preferred methods are to use:
 - A graphic link: an icon provided by FirstGov.gov with alt text "FirstGov: U.S. Government Homepage." Instructions for adding the FirstGov icon can be found at: http://www.firstgov.gov/About/FirstGov_Logos.shtml
 - o <u>A text link</u>: "U.S. Government Homepage" (if it fits, use "FirstGov: The U.S. Government Homepage")

Implementation Deadline: December 31, 2005

Related Recommendation:

The working group recommends that the name for FirstGov.gov be changed to a name that is more intuitive, that better conveys the purpose of the website, and that is more marketable. Usability testing and focus groups conducted by FirstGov (as well as people who commented on these recommendations) indicate that the public is unfamiliar with the name and that it lacks real meaning. There have been numerous suggestions to change the name to usa.gov or us.gov, which are domains already registered by GSA. Changing the name would have minimal impact

on FirstGov's visibility and its number of visitors, since a permanent, automatic redirect could be made to the new URL for anyone who still searches for FirstGov.

5. POLICY: FEDERAL ORGANIZATIONS MUST ESTABLISH PRIORITIES AND A SCHEDULE FOR POSTING CONTENT ON THEIR PUBLIC WEBSITES.

a. Requirement: Agencies Must Comply with Section 207(f)(2) of the E-Government Act of 2002. Agencies must develop an inventory of information to be published on their websites, establish a schedule for publishing information, make those schedules available for public comment, and post the schedules and priorities on the website. Agencies should develop their website inventories based on the wants and needs of citizens as a whole and intended audiences. In establishing priorities, agencies should consider current and anticipated information needs, as well as historical, legacy materials.

Exceptions: There are no exceptions to this requirement.

Rationale: Section 207(f)(2) of the E-Government Act of 2002 requires each agency ("agency" here is defined in the Act) to:

- Establish a process for determining which information will be made available on the Internet and by other means;
- Develop priorities and schedules for making that information available;
- Make those priorities and schedules available for public comment;
- Post the priorities and schedules on the website; and
- Report the priorities in their annual report to OMB on implementing the E-Government Act.

- The E-Government Act requires agencies to establish priorities by December 2004. These recommendations suggest how to implement this requirement. The ICGI or OMB may want to circulate this guidance immediately, to help agencies meet this requirement.
- **Attachment E** includes a set of worksheets that agencies may use to establish an inventory and set priorities. The Web Content Management toolkit will include these worksheets.
- The first step is to create an inventory of content that all intended audiences need or want. The inventory should identify categories of information, such as press releases, publications, and budget documents—not specific documents.
- In general, agencies should set priorities as follows:
 - Priority 1: required by law, regulation, Presidential directive, or other official directive or to ensure national security
 - Priority 2: mission-critical and essential for program operations, but not required by law, regulation, or Presidential directive (that is, information or services that are directly tied to an agency's mission and/or strategic plan)
 - Priority 3: frequently requested information or services that would improve business processes and/or customer service to the public (for example, most commonly used forms, documents, applications, transactions, etc.).
 - Priority 4: other information
 - o If information fits in two or more priorities, agencies should assign it the highest priority.
- To determine the schedule for posting additional content, the agency should start with Priority 1 content and work down. Agencies also should consider:
 - o The frequency of use by the intended audience(s); and

- The level of effort and time required by the agency to convert the information for the Internet. There may be some "low hanging fruit" that might warrant a higher priority, such as content that is already available in another format that easily could be converted to the web. Conversely, there may be some older "legacy" documents or databases that might be assigned a lower priority if converting them to the web would pose an undue burden on the organization.
- The agency should incorporate this requirement in management plans and monitor performance.
- The agency should reinforce (or develop) policies to ensure that appropriate review and approval processes are in place for web content.
- The inventory, priorities, and schedule for posting additional content should be posted on the website for comment. Comments should be accepted by e-mail or a web-based comment form.
- When developing the inventory, agencies should use this guideline: If it can be public, and is
 of interest to the general public, it should be public. Agencies dealing with national defense
 and law enforcement should weigh security needs with the public's need to know.
- The agency's web content manager(s) must be included in the process of establishing the inventory, priorities, and schedule.
- The agency should post the full inventory, showing both content that already is available to
 the public and the publication schedule for additional content. The recommended location of
 this information, or a link to this information, is on the page containing web policies and
 important links.
- Organizations should adopt a routine review process—monthly, quarterly, semi-annually, or annually—to identify obsolete content and remove it.
- Additional guidance, along with examples and best practices, will be included on the Web Content Management Toolkit website.

6. POLICY: ORGANIZATIONS MUST CONTINUE TO COMPLY WITH EXISTING FEDERAL LAWS, REGULATIONS AND POLICIES. In addition to the particular actions discussed above, this guidance reiterates existing federal laws and regulations, general directives from previous Presidential and OMB memoranda, and other policies regarding federal public websites. Organizations should continue to follow these requirements, as indicated.

Note: Given that this section reiterates existing requirements, we have not included exceptions, implementation guidance, or an implementation deadline under each item, as we have in other sections of this document. Organizations should refer to the individual citations for these details. The Web Content Managers Toolkit will also provide additional guidance, best practices, and examples to help web content managers as they continue to implement these requirements.

a. Requirement: Federal Public Websites Must Comply with Privacy Requirements. All federal public websites must comply with existing laws and directives that address the need to protect the privacy of the American people when they interact with their government. Some of the key requirements for federal public websites include: (1) conducting privacy impact assessments; (2) posting privacy policies on each website; (3) posting a "Privacy Act Statement" that tells visitors the organization's legal authority for collecting personal data and how the data will be used; and (4) translating privacy policies into a standardized machine-readable format.

Organizations should review the following laws and regulations related to privacy protections to ensure that their public websites meet the full range of requirements:

- OMB Memorandum 03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002: http://www.whitehouse.gov/omb/memoranda/m03-22.html
- E-Government Act of 2002, Section 207(f)(1)(B): http://www.archives.gov/about_us/basic_laws_and_authorities/egov_act_section_207.html
- Privacy Act of 1974: http://www.usdoj.gov/foia/privstat.htm
- OMB Circular A-130, App 1: http://www.whitehouse.gov/omb/circulars/a130/a130appendix_i.html
- Children's Online Privacy Protection Act of 1998 (COPPA): http://www.ftc.gov/ogc/coppa1.htm
- b. Requirement: Federal Public Websites Must Have Security Protocols to Protect Information. All federal public websites must comply with Section 207(f)(1)(b)(iv) of the E-Gov Act of 2002, which requires organizations to have security protocols to protect information.
 - E-Gov Act of 2002, Section 207(f)(1)(b)(iv):
 http://www.archives.gov/about-us/basic-laws-and-authorities/egov-act-section-207.html
- c. Requirement: Federal Public Websites Must Ensure Access for People with Disabilities. All federal public websites must continue to comply with the requirements of Section 508 of the Rehabilitation Act (29 U.S.C. 794d), designed to make online information and services fully available to individuals with disabilities. Organizations should review Section 508 and accompanying guidance to ensure that their public websites meet the requirements:
 - Section 508 of the Rehabilitation Act: http://www.access-board.gov/sec508/guide/act.htm
 - Guidance for Implementing Section 508: http://www.section508.gov/index.cfm
- d. Requirement: Federal Public Websites Must Comply with the Freedom of Information Act (FOIA). All federal public websites must comply with existing laws and directives that relate to the Freedom of Information Act. The principal requirement is that websites must have a page that includes certain content as required by the Freedom of Information Act (FOIA). This page should include information about how the public can request information under the Act. Organizations should review the FOIA and implementation guidance to ensure that their public websites meet the full range of requirements:
 - Freedom of Information Act: http://www.usdoj.gov/04foia/foiastat.htm
 - Implementation guidance from the Department of Justice: http://www.usdoj.gov/oip/foiapost/2003foiapost9.htm.
- e. Requirement: Federal Public Websites Must Comply with Information Quality Guidelines. All federal public websites must comply with Public Law 106-554, "Guidelines for Ensuring and Maximizing the Quality Objectivity, Utility, and Integrity of Information Disseminated by Federal Organizations." This law requires federal organizations to issue guidelines for "ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal organizations." Organizations should review the Act and implementation guidance to ensure that their public websites meet the requirements:

- Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001: Public Law 106-554, "Guidelines for Ensuring and Maximizing the Quality Objectivity, Utility, and Integrity of Information Disseminated by Federal Organizations": http://www.whitehouse.gov/omb/fedreg/reproducible2.pdf.
- f. Requirement: Federal Public Websites Must Provide Appropriate Access for People with Limited English Proficiency. Organizations must comply with existing requirements of Executive Order 13166, "Improving Access to Services for People with Limited English Proficiency," based on Title VI of the Civil Rights Act of 1964, which bans discrimination on the basis of national origin. Agencies must specifically follow guidance related to agency websites.
 - See Executive Order 13166, "Improving Access to Services for People with Limited English Proficiency": http://www.usdoj.gov/crt/cor/Pubs/eolep.htm
 - Department of Justice guidance for implementing the Executive Order: http://www.usdoj.gov/crt/cor/Pubs/lepqa.htm. This includes guidance on federal public websites.
- g. Requirement: Federal Public Websites Must Comply with the Paperwork Reduction Act (PRA). All federal public websites must comply with the Paperwork Reduction Act (44 U.S.C. Chapter 35) to ensure that information collected from the public minimizes burden and maximizes public utility. One of the principal requirements of the PRA is that organizations must have OMB approval before collecting information from the public (such as forms, general questionnaires, surveys, instructions, and other types of collections), and they must display the current OMB control number on the collection. Organizations should review the PRA and implementation guidance to ensure their public websites meet the full range of requirements:
 - Paperwork Reduction Act: <u>http://www.archives.gov/federal_register/public_laws/acts.html#pra</u>
 - Paperwork Reduction Act, Section 3501, "Public Information Collection Activities": http://www.archives.gov/federal_register/public_laws/paperwork_reduction_act/3507.html
 - Guidance from OMB: "Paperwork Requirements": http://www.whitehouse.gov/omb/inforeg/infocoll.html
- h. Requirement: Federal Public Websites Must Comply with the Government Paperwork Elimination Act (GPEA). All federal public websites must comply with the Government Paperwork Elimination Act (GPEA, Pub. L. 105-277). The Act requires that, when practicable, federal organizations use electronic forms, electronic filing, and electronic signatures to conduct official business with the public, by 2003. Organizations should review the Act to ensure that their public websites meet the full range of requirements:
 - Government Paperwork Elimination Act (GPEA):
 http://www.archives.gov/records management/policy and guidance/electronic signature te chnology.html
- i. Requirement: Federal Public Websites Must Comply with Records Management Requirements. All federal public websites must comply with existing laws and regulations related to the management of public web records. This includes the need for organizations to comply with necessary policies and standards to implement the E-Government Act of 2002, Section 207(e), "Public Access to Electronic Information," which will be issued by December

2005. Organizations should review existing laws and regulations to ensure their public websites meet the full range of requirements:

- Code of Federal Regulations (CFR), Parts 1220—1238: http://www.archives.gov/about_us/regulations/subchapter_b.html
- E-Gov Act of 2002, Section 207(e), "Public Access to Electronic Information": http://www.archives.gov/about_us/basic_laws_and_authorities/egov_act_section_207.html

In addition, NARA will be issuing policy and requirements for the capture and transfer of a government-wide snapshot of federal public websites at the end of an Administration.

- j. Requirement: Federal Public Websites Must Comply with Digital Rights, Copyright, Trademark, and Patent Laws. Most content on federal public websites is in the public domain and should not include copyright or other intellectual property notices. However, when an organization uses or duplicates information available from the private sector as part of an information resource, product or service, the organization must ensure that the property rights of the private sector source are adequately protected. These protections apply to any material posted to federal public websites, such as documents, graphics, or audio files. Organizations should also review content to determine if it is subject to international copyright laws. Organizations should review the relevant laws and regulations to ensure that their public websites meet the full range of requirements:
 - Digital Millennium Copyright Act: http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=105 cong public laws&docid=f:publ304.105.pdf
 - Copyright Law: http://www.copyright.gov
 - U.S. Trademark Law: http://www.uspto.gov/web/offices/tac/tmlaw2.html
 - U.S. Patent Law, U.S. Code 35, Chapter 26: http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse-usc&docid=Cite:+35USC261
- k. Requirement: Federal Public Websites Must Comply with the Government Performance and Results Act (GPRA). All federal public websites must comply with Government Performance and Results Act of 1993, which requires organizations to make their annual performance plans readily available to the public.
 - Government Performance Results Act of 1993: http://www.whitehouse.gov/omb/mgmt-gpra/gplaw2m.html
- I. Requirement: Federal Public Websites Must Comply with the No Fear Act. All federal public websites must comply with the existing No Fear Act. Notification and Federal Employee Anti-discrimination and Retaliation of 2002 (No Fear Act) Public Law No. 107-174). Organizations should review the relevant law to ensure that their public websites meet the full range of requirements:
 - No Fear Act Notification and Federal Employee Anti-discrimination and Retaliation of 2002 (No Fear Act) Public Law No. 107-174): http://www.hhs.gov/eeo/no Fear act of 2001.html
- m. Requirement: Federal Public Websites Must Comply with the Small Business Paperwork Relief Act. All federal public websites must comply with Small Business Paperwork Relief Act

of 2002, which requires organizations to designate a single point of contact for small businesses, and to post the contact information on the organization's website.

- Small Business Paperwork Relief Act of 2002: http://www.whitehouse.gov/omb/inforeg/sbpra102803.html
- n. Requirement: Federal Public Websites Must Comply with Restrictions on Lobbying. All federal public websites must comply with existing laws that prohibit federal public websites from being used for direct or indirect lobbying. Organizations should review the relevant law to ensure that their public websites meet the full range of requirements:
 - "Prohibition of Lobbying," Title 18, Section 1913 of the U.S. Code: http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse-usc&docid=Cite:+18USC1913
- o. Requirement: Federal Public Websites Must Comply with Upcoming Requirements to Categorize Information. All federal public websites must comply with upcoming policies and standards to implement the E-Government Act of 2002, Section 207(d), which are being developed based on recommendations from the ICGI's Categorization of Information Working Group.
- 7. POLICY: DEVELOPING WEB CONTENT POLICIES AND REQUIREMENTS FOR FEDERAL PUBLIC WEBSITES IS AN ONGOING PROCESS, REQUIRING STRUCTURE. The federal government must continue to review and improve web content policies and practices and look ahead to new policies and practices that can make federal public websites, both individually and as a group, the most citizen-focused and visitor-friendly in the world. When common web content practices will both improve the visitors' experience and make better use of resources across the federal government, they should be implemented. We need a structure to ensure this happens.
 - a. Recommendation: OMB Should Establish a Web Content Advisory Council
 establish a permanent Web Content Advisory Council to regularly review and make
 recommendations for strengthening web content policies and for coordinating support for
 implementing the policies across federal agencies. The Council should continue, and expand
 on, the work started by the Web Content Standards Working Group. The Council should serve
 as an advisory group to OMB agencies and base its recommendations on regular input from
 federal web content managers, others who work on federal websites, program managers, other
 stakeholders, web content experts, industry advisors, and citizens. OMB should ensure that the
 Council has adequate funding and support. The Council should report annually to OMB on its
 accomplishments and plans.

The Council's Duties: The Council should have two primary responsibilities:

- 1. Support OMB by making recommendations about web content policies and practices
 - Review existing policies, requirements, and guidelines and propose changes and additions, as necessary.
 - Review requests for common content on federal public websites, such as proposed links and icons. Recommend to OMB the best way to implement the common content, based on usability testing, audience analysis, and other best practices.

- Recommend OMB action on current and proposed cross-agency portals.
- Offer other recommendations related to web content practices, requested by OMB.
- 2. Support federal web content managers by coordinating best practices, research, and other practical tools that can be shared and leveraged across all federal agencies.
 - Manage and maintain the Web Content Management Toolkit website which will include a
 complete listing of all requirements and guidelines for federal public websites,
 implementation guidance, resources and references for implementation, examples and
 best practices, and other important information for federal web content managers.
 - Plan and host an annual Web Content Managers Workshop to discuss lessons learned and best practices in implementing requirements and guidelines for federal public websites, ideas, trends, and possibilities for collaboration.
 - Research and establish a directory of web content manager resources, including training opportunities for web content managers.
 - Manage the web content managers' contact database and listserv.
 - Coordinate regular meetings of web content managers, incorporating both presentations on current issues and "roundtable" discussions intended to share lessons learned and best practices.
 - Research, evaluate, and propose partnerships to provide agencies common services such as web analytical support, usability testing, customer analysis, and translation resources.

Composition:

- OMB and the Director of FirstGov.gov, as the web content manager of the official federal Internet portal (designated under Section 204 of the E-Gov Act of 2002), should sponsor the Web Content Advisory Council.
- The Council should be composed of at least 30 members, including a representative from OMB. The members should be primarily web content managers—federal employees who actually write, edit, manage, and form strategic plans for the content of federal websites—from the highest level in their departments and agencies.
- The Council should include at least one web content manager from each Cabinet-level department or agency and one web content manager from at least five independent agencies or subordinate organizations. The independent agencies or subordinate organizations represented should be rotated every two years, to include a variety of perspectives.
- OMB should nominate Council members, in consultation with the Director of FirstGov.gov, and subject to approval by the department or agency heads.
- OMB should review membership at least annually, and changes should be made on the recommendation of agency heads, the Director of FirstGov.gov, or both.
- OMB or the Director of FirstGov may designate a project manager, a steering committee, or other organizational support to assist in coordinating the duties of the Council.
- OMB or the Director of FirstGov may invite other federal web content managers or others with specialized knowledge and experience to be involved in specific tasks of the Council.

Rationale: Accomplishing the goal of making the United States government's public websites the most citizen-focused and visitor-friendly in the world cannot be accomplished by a one-time initiative. It needs to be an ongoing process and coordinated approach. Technology improvements, growing expectations of citizens, usability research, new trends, and best practices may inspire changes in existing policies and requirements or new policies and

requirements. Federal web content managers need a source of guidance and resources to help them implement policies and requirements and to learn about new directions. Requirements and decisions based on recommendations of an Advisory Council of their peers will be more credible to federal web content managers.

Implementation:

- Since the ICGI Web Content Standards Working Group already is formed and functioning in the way the Council would function, the Working Group should be designated the initial "Web Content Advisory Council" when the OMB guidance is issued. This will keep momentum going and make use of the knowledge that Working Group members have gained in this process. Agency heads should have an opportunity to approve their designee or nominate an alternate.
- Additional members should be nominated to complete the Council.
- OMB should ensure that the Council has sufficient funding to operate and conduct the recommended duties.

Implementation Deadline: Immediate

b. Recommendation: Common Content and Links Should Be Approved by OMB Federal agencies that want to require common content or links on federal public websites other than their own should submit that request to OMB before incorporating it in rules or regulations. OMB should ask the Web Content Advisory Council for recommendations on these requests.

Exceptions: There are no exceptions to this requirement.

Rationale: In the last few years, both Congress and certain federal agencies have established requirements for web content, including specifying the names and locations of links that must be included on every federal public website. While the intentions may be good, the result is not always the best for the public. In fact, so many links have been required or suggested that many federal website homepages have become cluttered and confusing to citizens. A link location might work well on one website and not on another because the organization and audiences of each homepage is different. Usability testing is the best way to determine names and locations of links.

Implementation Guidance:

- OMB should require federal agencies to submit requests for common content and links.
- OMB should ask the Web Content Advisory Council to review the requests for common content and links and recommend to OMB the best way to implement them, based on usability testing, audience analysis, and other best practices.
- OMB should issue guidance, based on the recommendations of the Web Content Advisory Council.

Implementation Deadline: Immediate

c. <u>Recommendation: OMB Should Review and Approve Cross-Agency Portals</u> OMB should establish a process to review and approve current and proposed cross-agency portals to ensure they are needed, include all appropriate agencies, do not duplicate other websites, and have sufficient support to be sustained. **Exception:** There are no exceptions to this requirement

Rationale: In the past few years, there has been a proliferation of cross-agency portals. The FirstGov.gov website currently lists 83 existing cross-agency portals. Others are in development. Currently, any group that can get a domain name can establish a portal, even if that portal duplicates other portals, fails to fill a legitimate business need, or lacks support of appropriate agencies. The public may not be getting a full view of all available information and resources, even though they believe they are. Some portals start out well but fail over time, due to lack of maintenance. Further, agency web teams are being stretched to provide support to all the portals that are emerging.

While cross-agency portals are an excellent way to blend common content and make it easier for the public to find what they need, portals must be comprehensive, high quality, sustainable, and meet a legitimate business need.

Implementation Guidance:

- OMB and GSA should establish stronger policies for issuing domain names for crossagency portals.
- OMB should ask the Web Content Advisory Board to review and recommend appropriate action for new cross-agency portals. Recommendations should be based on:
 - o Review of plans to meet a legitimate business need,
 - o Analysis of existing portals to determine if there is duplication,
 - Evidence that the new portal has sufficient commitment of resources to ensure it can be sustained, and
 - Review of the agencies involved, to ensure that all agencies having related missions and functions are included.
- OMB should review existing cross-agency portals and take appropriate action on those that
 fail to meet a legitimate business need, duplicate others, fail to include all appropriate
 agencies, appear to be out-of-date or lack maintenance, or any combination of these factors.
- The Director of FirstGov.gov should ensure that all approved cross-agency portals are listed on FirstGov.gov.

Implementation Deadline: Immediate

d. Recommendation: Agencies Should Report Progress and Compliance with Web Content Policies and Requirements Agencies must report on compliance with requirements from the E-Government Act of 2002, Section 202(g). Those reports should include progress and compliance with web content policies and requirements, including results from the agency's standard customer satisfaction survey (see Recommendation 2e).

Exceptions: Only OMB may grant exceptions

Rationale: Since these policies, requirements, and guidelines emanate from the E-Government Act, they should be incorporated in the annual reporting required by the Act.

Implementation Guidance: Web content managers must participate in determining compliance with these requirements, for the annual report. Since many web content managers work in organizations other than the CIO, agency heads and CIOs must ensure that the web content

managers are aware of the internal report deadlines and any guidance that has been provided by OMB. Implementation Deadline: Annual reporting date required by OMB

ATTACHMENT A

Interagency Council on Government Information Web Content Standards Working Group

WORKING GROUP MEMBERS AND ADVISORS

Executive Sponsor: Beverly Godwin, Director, FirstGov Operations, General Services Administration

Members

1. Candi Harrison (Co-Chair)

Departmental Web Manager for Field Operations, Office of Departmental Operations and Coordination, Department of Housing and Urban Development

2. Sheila Campbell (Co-Chair)

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3. Nancy Allard

Lead Archives Specialist, Policy and Communications Staff, National Archives and Records Administration

4. Alice Bettencourt

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6. Annetta Cheek

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7. Terry Davis

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8. Kate Donohue

Co-Web Manager, Web Communications Services, Office of Public Affairs, Department of Labor

9. Karen Drayne

Content Specialist, Web Services Staff, Justice Management Division, Department of Justice

10. Brian Dunbar

Internet Services Manager, Media Services Division, Office of Public Affairs, National Aeronautics and Space Administration

11. Sam Gallagher

Departmental Web Manager for Headquarters Operations, Office of Departmental Operations and Coordination, Department of Housing and Urban Development

12. Colleen Hope

Director, Office of Electronic Information, Bureau of Public Affairs, State Department

13. Gwynne Kostin

Director, Web Content, Department of Homeland Security

14. Julia Laws

Division Director, Information Management, Department of Interior

15. **Jeffrey Levy**

Senior Web Advisor, Office of Public Affairs, Environmental Protection Agency

16. Bernie Lubran

Project Manager, Federal Consulting Group, Department of Treasury

17. Suzanne Nawrot

IT Specialist (Web Manager), Corporate Systems Division, Chief Information Officer, Department of Energy

18. Jennifer Reeves

IT Specialist, Development Services Group, Office of the CIO, Department of Education

19. Janet Stevens

Website Project Manager, Risk Management Agency, Department of Agriculture

20. Martha (Marti) Szczur

Deputy Associate Director for Specialized Information Services, National Library of Medicine, Department of Health and Human Services

21. Keith Thurston

Assistant Deputy Associate Administrator, Office of Electronic Government, General Services Administration

22. Alan Vander Mallie

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Advisors

1. Joan Bryan

Web Content Manager, Social Security Administration

2. Tom Freebairn

USA Services, General Services Administration (common content models)

3. Sanjay Koyani

Department of Health and Human Services (usability)

4. Joanne McGovern

Senior Content Specialist, FirstGov, General Services Administration (liaison to other working groups)

5. John Murphy

Director, E-Gov Solutions, General Services Administration (search technology)

6. Janice Nall

Office of Government-wide Policy, General Services Administration (usability, content standards)

7. Russell O'Neill

General Services Administration (IT standards)

8. Gina Pearson

Economic Research Service, Department of Agriculture (usability)

9. Helen Savoye

Deputy Web Manager, Department of Housing and Urban Development (information technology)

10. Kim Taylor

Director of Web Services, Department of Agriculture (IT)

11. Carlynn Thompson

Director, Component Information Support, Defense Technical Information Center, Department of Defense (technical standards and policies)

12. James Vaughn

USA Services Program Manager, General Services Administration (customer service)

13. Tricia Wellman

Senior Attorney, Office of Information and Privacy, Department of Justice (e-FOIA)

14. Michael White

National Archives and Records Administration (U.S. Government Manual)

ATTACHMENT B Interagency Council on Government Information Web Content Standards Working Group

DEFINITIONS

The following are definitions for terms used in this report.

Agency: An organizational unit of the executive branch that is any of the following:

- A member of the cabinet;
- A major subdivision of a cabinet agency. For example:
 - In the Department of the Interior: the Bureau of Land Management, the National Park Service, and the Office of Surface Mining, among others
 - o In the Department of Defense: major components such as the military departments, the defense agencies, and the field activities.
- An independent agency, such as
 - The Central Intelligence Agency
 - o The Advisory Council on Historic Preservation
 - The Federal Deposit Insurance Corporation
 - o The Federal Energy Regulatory Commission
- Any other organizational unit OMB designates as an organization for the purposes of web content management.

Alternative Formats: Web file formats that are not universally accessible, but are available to the public via specific software or plug-ins. These formats include, but are not limited to: Portable Document Formats (PDF), WordPerfect, MS Word, MS PowerPoint, and statistical data files, such as SAS, SPSS, SQL, and MS Excel.

Content: Any material that is available on a federal public website.

Cross-Agency Portal: A website that brings together information and services from multiple federal agencies or organizations about a particular topic or for a particular audience group.

Document: A file provided on a website that contains text, such as pages, text files, word processing files, and spreadsheet files.

Domain Names: Web addresses that are used to help people find websites on the Internet. Domain names are made up of a hierarchy known as levels, which are separated by periods (".") within the domain name. Top-level domains include domains such as .gov, .mil., .us, .org, .com., and .edu. Examples of a federal organization's domain name are army.mil, noa..gov and publicdebt.treas.gov.

Extranet: A public-private website or portal, secured or password-protected, specifically designed for selected workers in an organization and selected external partners to conduct internal business.

Federal Public Website: Any website that meets these three criteria:

- Is funded and sponsored entirely by a federal executive branch agency or organization;
- Presents official government information, and
- Is available to the public without passwords or log-ins.

Homepage: The page that serves as the front door of a website. Every website has a homepage. No website has more than one homepage.

Industry Standard Web Formats: Web file formats that are universally accessible to anyone with a web browser, which do not require specific software or plug-ins. HTML and XML are current examples of industry standard formats.

Intranet: A private website or portal, secured or password-protected, specifically designed for workers in an organization to conduct internal business.

Major Entry Point: Pages that are frequently accessed directly by the public. Major entry points include:

- An organization's homepage;
- The root of the level right below the homepage (for example, http://www.whitehouse.gov/omb/ and http://www.whitehouse.gov/omb/);
- The pages submitted in response to the Department of Justice Bi-Annual Survey for the Review of Agency Implementation of Section 508 of the Rehabilitation Act of 1973; and
- Any other page that website statistics indicate is most often visited, bookmarked, or linked to by website visitors.

Navigation: The means by which a visitor can navigate the content of a website. Navigation usually consists of a collection of links to sections and subsections of a website.

Organization and Federal Organization: Any entity of a federal executive branch agency, at any level of the agency—for example, any department, agency, bureau, division, office, program, or other organizational unit.

Page: A text file at a single URL, written or generated in a markup language like HTML, and viewed through a browser. For the purpose of these policies, pages do include PDFs but do not include pop-up windows, dialog windows, files that provide text descriptions of non-text content to enhance accessibility (d-links), redirection pages, or slides within a presentation, except where otherwise noted.

Second-Level Domain Name: A website address that is at the next highest level of the hierarchy below the top-level domains of .gov and .mil, such as hud.gov, fbi.gov, regulations.gov, or army.mil. It includes all websites registered through the official Government Domain Registry (including domain names in the .fed.us domain), and all websites registered through the Department of Defense .mil registry. It does not include websites considered to be third-level domains, such as nmfs.noaa.gov or www.publicdebt.treas.gov.

Site Map: A linked, graphic or text-based display of a website's hierarchy, similar to an organization chart. Typically, site maps break down a website's content into increasingly specific subject areas to help the visitor understand its structure, from the main navigation pages to their subordinate pages. The main difference between a site map and a subject index is that a subject index is typically an alphabetical list, not a hierarchically structured set of links.

Subject Index: A list of a website's content, typically presented in alphabetical order, similar to an index in the back of a book. The main difference between a subject index and a site map is that a site map conveys website structure or navigation.

Usability: The measure of the quality of a visitor's experience when using a website, including the ability to accomplish basic tasks.

Web Content Manager: Federal employees who write, edit, manage, and form strategic plans for the content of federal websites.

Website: A collection of web content organized under a single homepage.

ATTACHMENT C Interagency Council on Government Information Web Content Standards Working Group

VETTING LIST

The following groups and individuals were invited to provide feedback on the draft recommendations developed by the Web Content Standards Working Group in April 2004.

- Federal Web Content Managers Forum
- CIO Council
- Public Affairs Officers
- Agency Webmasters and IT Specialists
- E-Gov Initiative Program Managers
- Web Managers within Working Group member agencies
- Public Domain Directory Working Group
- Other ICGI working groups and sub-groups (Electronic Records Policy Working Group and Categorization of Information Working Group)
- Legislative Branch agencies (Government Printing Office and Library of Congress)
- CENDI (Commerce, Energy, NASA, Defense Information Managers Group)
- USA Services Advocates (agencies involved in customer relationship management)
- Federal Library and Information Center Committee (FLICC)
- American Library Association
- Selected experts with interest in E-Gov, specifically Gerry McGovern, Pew Foundation, Council for Excellence in Government
- Industry Advisory Council

The initial draft recommendations have also been posted on the ICGI website.

ATTACHMENT D Interagency Council on Government Information Web Content Standards Working Group

ESTABLISHING A FEDERAL PUBLIC WEBSITE INVENTORY AND PUBLICATION PRIORITIES

Here is a simple 3-step process that can help you meet the requirements of Section 207(f)(2) of the E-Government Act of 2002. It will help you decide what should be on your website—both now and in the future—and help you set publication priorities.

Just follow the steps and keep this in mind: If it can be public, and is of interest to the public, it should be public. Agencies dealing with national defense and law enforcement should weigh security needs as well as the public's need to know.

Step 1: Determine your audiences

- On Worksheet 1: List all the audiences who do, should, and might visit your website. Determine the potential size of those audiences.
- Think about audiences in the broadest sense, for example, business partner groups, client groups, media, elected officials, librarians and researchers, international visitors, senior citizens, students, children, parents, teachers, and so forth. And—of course—be sure to list "citizens" as an important audience group.
- Note your list on Worksheet 1.

Step 2: Develop your inventory

- Use Worksheet 2 to create your inventory. List the audience groups you defined in Step 1 down the left side of the matrix, and list the various components of your organization or organization across the top.
- Complete the matrix by answering two questions: What does this audience group want to know
 from this part of our organization? What does this part of our organization need to tell this audience
 group? List broad categories of information, such as press releases, budget documents, and
 publications.
- Include both content that currently exists on your website and content that should exist on your website.
- Make sure you address common requests. Look at customer questions from email, focus groups, phone calls, and surveys. Look at your search logs to identify information visitors to your website have sought. Talk to people who answer the telephones or act as desk receptionists.

Step 3: Set priorities

Use Worksheet 3 to help you set priorities.

- In column 1, list all the content items you identified as your inventory, on Worksheet 2.
- In column 2, note whether the information or services already exists on the website, exists in some form but is not on the website, or has to be developed (to determine a general Level of Effort).
- In column 3, note whether the information is:
 - Priority 1: required by law, regulation, Presidential directive, or other official directive or to ensure national security
 - Priority 2: mission-critical and essential for program operations, but not required by law, regulation, or Presidential directive (i.e.—information or services that are directly tied to your mission and/or strategic plan)
 - Priority 3: frequently requested information or services that would improve organization business processes and/or customer service to the public (e.g. most commonly used forms, documents, applications, transactions, etc.).
 - o Priority 4: other information
- Some inventory items may fall into more than one priority. Assign them the highest priority.
- In column 4, assign a publication target for every inventory item that is not already posted on the
 website. Clearly the content at the highest priority levels should be targeted first. But also look for
 opportunities to post content that already exists in another format that could be easily converted for
 web use, particularly if that content will improve customer service. We suggest grouping content into
 3 target categories: 1 year out, 2 years out, and 3 years out, but you may want to add more.
- Be sure that, as you assign a publication target, you have the resources to meet that target.

DEVELOPING AN INVENTORY, PRIORITIES, AND PUBLICATION SCHEDULE FOR FEDERAL WEBSITES

Worksheet 1: DEFINE YOUR WEBSITE AUDIENCES

List the different audience groups that might use your website. Think about the groups that you want to target <u>and</u> about the groups who might just end up at your website. Look at your email. Think about citizen groups, business groups, and other government organizations.

Citizens as a whole	
2.	
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20.	

DEVELOPING AN INVENTORY, PRIORITIES, AND PUBLICATION SCHEDULE FOR FEDERAL WEBSITES

Worksheet 2: DEVELOP YOUR INVENTORY OF INFORMATION/SERVICES FOR THE WEBSITE

- Down the left, list the audience groups you identified on Worksheet 1.
- At the top of each column, list the components of your organization or program areas.
- Fill in each box by answering two questions: What does this audience group want to know from this component? What does this component want to tell this audience group?

Audience	Organization Components or Program Areas			

DEVELOPING AN INVENTORY, PRIORITIES, AND PUBLICATION SCHEDULE FOR FEDERAL WEBSITES

Worksheet 3: SET PRIORITIES AND PUBLICATION TARGETS

- In column 1, list all the content items you identified as your inventory, on Worksheet 2.
- In column 2, note whether this information is on the website currently (C), exists in some form but is not on the website (E), or has to be developed (D).
- In column 3, note whether the information is:
 - Priority 1: required by law, regulation, Presidential directive, or other official directive or national security.
 - Priority 2: mission-critical and essential for program operations, but not required by law, regulation, or Presidential directive (i.e.—information or services that are directly tied to your mission and/or strategic plan)
 - Priority 3: frequently requested information or services that would improve organization business processes and/or customer service to the public (e.g. most commonly used forms, documents, applications, transactions, etc.).
 - Priority 4: other information
- Some inventory items may fall into more than one priority. Assign them the highest priority.
- In column 4, assign a publication target for every inventory item that is not already posted on the website.

Content	Status	Priority	Publication Target





WEB CONTENT	SOCIAL MEDIA	MOBILE	CHALLENGES & CONTESTS	CONTACT CENTERS	
custom Training Ei	RIENCE	Communities	DigitalGov B	Blog	Services & Tools

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ICGI Web Content Standards Working Group

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Summary of Comments on Initial Draft Recommendations May 24, 2004

A. Overview and General Comments

The Interagency Council on Government Information (ICGI) Web Content Standards Group's initial draft recommendations were circulated to a broad list of vetting groups in early April 2004 (see Attachment C of the ICGI's Final Report to OMB). We received 120 sets of comments during the three-week informal vetting period, including comments from virtually every cabinet-level agency, many sub- and independent agencies, and several agencies of the legislative branch. Many of the comments were extensive (at least several pages), while others offered comments on just one or two recommendations.

Because we emphasized that this was an informal vetting process, most of the comments were from individuals and do not necessarily reflect the official views of a particular agency. In a few cases, agencies coordinated their comments internally and provided more formal comments.

While the vast majority of comments were neither explicitly positive or negative, the overall tone was substantially positive. Overall, respondents expressed support of the effort to establish government-wide policies for federal public websites. Many comments said the document was reasonable, well written, and based on sound industry best practices. The vast majority of comments asked for clarification or more detail about how the policies would be implemented - for example, clarification about which sites would be covered by the policies, excluded, or grand-fathered. Most of the negative comments expressed concern about the lack of resources to implement the requirements. Other respondents expressed concern that the recommendations are too restrictive and don't provide enough flexibility for agencies to manage websites according to their agency's specific needs.

Recommendations that received the most comments were:

Recommendation	Number of Individuals/Agencies Providing Comments
(1c) Linking to External Sites	56
(2c1) Contact information	44
(2d) Websites must be results-oriented	ed 41
(1d) Currency of information	38
(3i) Metadata	38
(1a) Government Domains	33

Toolbox



In This Report

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- **Attachments**
- Comments

Recommendations that received the most *positive* comments were:

Recommendation	Number of Individuals/Agencies Providing Comments
(3i) Metadata	38
(3a) Common Access	24
(3e) Documents in Different File	16
Formats	
$\hbox{(3b) Access for People with Disabilities}\\$	14
(3c) Plain Language	14
(3g) Consistent Navigation	12
(4a) Avoid Duplication	12

Recommendations that received the most *negative* comments were:

Recommendation	Number of Individuals/Agencies Providing Comments
(1c) Linking to External Sites	28
(2d) Websites Must be Results- Oriented	17
(1d) Currency of Information	12
(1a) Government Domains	11
(2b) Homepages must be citizen- focused	10

Sample General Comments:

- The Working Group has done an excellent job of laying out the extraordinarily wide range of issues to be addressed in carrying out the mandates of Section 207(f)1) of the E-Government Act of 2002.
- Hooray! These standards will improve the federal government's credibility and
 accountability to the citizens of this country....The easier we make it for our visitors to
 find the information they need, the better it is for the federal government as a whole.
 One bad agency website makes all the rest of us look bad, too.
- The guidance is rooted in existing and emerging best practice which they should continue to be - and demonstrate significant research and thought has gone into their formulation for Federal Web site guidance.
- We believe the draft document is very well written and incorporates many best practices generally accepted throughout industry.
- Kudos on a good product. I manage a website at the Department of Energy and have trouble taking a stand on Federal best practices without having related Federal documentation to reference and backup my findings. Federal web content standards will help immensely.
- Overall, while there are good reasons for the standards proposed, it is highly likely that
 many managers will elect to take currently public sites offline as they do not have
 people resources or funds available to implement the changes mandated by this
 standard.
- There is the assumption that appropriate resources are available to implement these recommendations. You may wish to consider some statement with regards to resource allocation in order to accommodate the suggested recommendations of the Draft.
- We are gravely concerned with any effort to mandate on a federal-wide basis the
 content of our Web site or our Information Architecture. We agree in general with the
 goal of these standards, but not the detailed, prescriptive nature of the standards and
 disagree with the use of the word must....
- Generally good issues included here. Overall, however, [we] prefer a much more significant and robust policy than this movement "towards" common look and feel that provides more consistency in branding and assurance of the authoritative source. Not laying the foundation for it here will be missing the one legislatively mandated opportunity to implement more logic and management to the .Gov domain.
- I found the recommendations to be well written and containing solid logic for design

and concept.

B. Comments on Individual Recommendations

1a. Agencies Must Use Government Domains

Positive: 7
Negative: 11
Neutral: 15
No Comment: 75

Most comments asked for clarification about which sites this requirement would apply to, including questions about "partner" sites. Negative comments expressed concern about not being able to maintain sites in the .us or .edu domains, and the cost of switching to .gov or .mil. Positive comments said this would help reign in sites in other domains. Some mentioned the need for standard naming conventions for government domains.

Sample Comments:

- I can't emphasize how important it has been for us to keep these non-dot-gov sites from proliferating.
- I find the wording in the Rationale: "assures the public that these are official
 government sites and are accountable for the site's content" not to be convincing.
 Domain's on .edu sites or other web sites from reputable organizations are accurate
 and accountable for their content.
- The policy should address these unique situations where the federal agency is part of a larger partnership.
- This could become very problematic for agencies engaged in extensive operations overseas...where local domains are purchased.
- NTIA strongly opposes this proposed policy. The domain .us should be included as an
 official U.S. government domain because this domain, in addition to .gov and .mil, is
 operated on behalf of the U.S. government, remains under the control of the
 Department of Commerce, and is now being used by many agencies.

1b. Agencies Must Note Sponsorship of Web Sites

Positive: 2
Negative: 9
Neutral: 12
No Comment: 97

Many of the negative comments reflected confusion about the extent to which web pages would need to be altered to include the sponsorship text and/or title tags. Others were confused by the title tag requirement, which many readers misinterpreted as metadata. Some wanted clarification about whether certain types of pages mainly PDFs) would be excluded.

Sample Comments:

- Our reviewers support both aspects of this idea, i.e. putting the name of the agency organization on every page and in the metadata. However, they believe strongly that this should not be in the page title tag or in the keyword metadata...
- Yes, sites should identify themselves to our visitors but in terms of usability, it's also
 important that the title contain the specific information available on a page...which is
 more important than the agency name, in terms of Internet searchers finding the
 information that they need...

1c. Agencies Must Follow Basic Common Linking Practices

Positive: 10 Negative: 28 Neutral: 18 No Comment: 64

Many comments reflected confusion about the difference between disclaiming links to external sites and merely notifying a user when they go to another site. Some objected to the prohibition on disclaiming other Federal sites, saying they couldn't endorse content from another federal agency. Many wanted to eliminate the option for using "exit pages," noting usability studies that show users don't like them. Also, several people objected to posting linking policies on the Web, saying they are internal policies that should not be shared with the public. Several supporters also recommended a standard exit icon for all Federal web sites.

Sample Comments:

- I like your recommendation to display an icon next to the hyperlinks of external sites.

 I would recommend that you develop a standard icon maybe in a couple of small sizes) that could be adopted by all agencies as a standard for an external hyperlink.
- There was some disagreement among our staff as to whether the entire policy needed to be on the site, as these cases are not always cut-and-dried. But we all agreed that general guidelines should certainly be posted.
- The prohibition from having an exiting disclaimer for links to other Federal sites... how
 could this be justified since we have no control over the content of other Federal sites?
 There is no way for one agency to verify the accuracy of information on anther's
 website...A statement of "no need to disclaim" would be a much better way to handle
 this.
- Failure to notify users that they are going to another site where the policy is different would be a disservice, e.g., suppose an agency applies for and receives the permission to use permanent cookies on their site or a portion of their site?
- I'm grateful that there are several options available [for notifying users when linking to another site]. But have some concern about the exit page option because of the additional download requirement for visitors...

1d. Federal Public Websites Must Convey Current Information

Positive: 4
Negative: 12
Neutral: 22
No Comment: 82

Most comments were generally supportive and liked having the choice of different date designations. However, many thought the options listed didn't cover the range of possible circumstances—including what to do with historical documents that don't change. Several expressed concern about the technical resources required to implement the policy, including how to put dates on dynamically generated sites.

Sample Comments:

- Please continue this practice. I have an icon titled "Historical" on old content that is still applicable or of value being on the website.
- We recommend that the term "current" be defined. Our particular concern is how to indicate that an entire web site and all of its contents are non-current, historical records
- We are concerned of the benefit of this requirement. The addition of a "last ... date" does little to tell the user about the currency of the information. The content could be several months or years out of date and a recent update simply corrected a spelling error but might not update the content. Conversely, guidelines that were issued years ago could be as relevant today as the day they were issued, but the inclusion of a "last ... date" could cause the user of the information to question its relevancy and generate unnecessary and unneeded worry on the part of the user and unneeded contact for the agency

2a. Content Must Be Organized in Ways That Make Sense to Citizens

Positive: 3 Negative: 8 Neutral: 16 No Comment: 93

Most comments requested more clarification and implementation guidance. While many people appreciated having multiple ways to organize a site, others felt it was overly prescriptive and objected to organizing content for the general public rather than for specialized, target audiences. Still others recommended a stronger requirement.

Sample Comments:

- This guidance could be stronger, and linked to evaluation. Agencies should collect and evaluate user feedback, conduct usability testing, talk with their users, and continually assess their Web sites performance.
- While we agree with "citizen-centered," ...this does not mean that organizational
 alignments should be abandoned completely; rather a hybridization; or dual paths can
 prove more useful. A "one-size fits all" approach will not work when you are drilled
 down into an agency.
- Certainly, it is important to know the audiences). However, the recommendations should not give the impression that there is one appropriate means of organizing a site. EPA has MANY audiences, with differing needs.
- The guidance instructs agencies to "assess its customers' needs"...yet gave no guidelines on how that is to be accomplished.

2b. Home Pages Must Be Citizen-Focused

Positive: 3 Negative: 10 Neutral: 14 No Comment: 93

A number of those who commented thought this was redundant with the previous policy. Comments were mixed about restricting employee-focused information. Supporters were glad to see this issue addressed, though some asked for definitions of "visual clutter" and "extraneous content."

Sample Comments:

- · We heartily agree and are pleased to see this in writing.
- Since not all agency sites have the general public as their primary customer group. Change wording to something like 'the agency's defined customer groups' in place of 'general public'.
- The policy should state that agency home pages should focus on the needs of external customers not internal customers.

2c. Federal Websites Must Use Common Content and Terminology

Positive: 5
Negative: 28
Neutral: 104
No Comment: na

(totals include comments on all sub-recommendations)

Most comments requested clarification or additional guidance. Those who objected did not want the location and text of common links proscribed for them. Others urged usability testing of text labels and location of links. The vast majority of comments in this section were related to the "Contact Us" and "Important Notices" requirement.

Sample Overall Comments:

- Please, please, please don't tell webmasters where to post something on a page. Just tell us to do it and leave the where to us.
- Because these policies specify wording, the labels should undergo usability testing prior to the issuance.
- Please don't prescribe specific wording for all sites; instead, insist on consistent
 wording within sites. Different words have different meanings for different communities
 and contexts, most notably in scientific, medical, or legal contexts.
- At some point, agencies should be able to simply point everyone searching for anything
 to FirstGov, rather than having to figure out what the latest portals are and trying to
 give them all prominence on an agency's site.

Sample Comments on Specific Common Content Requirements:

Contact Information:

- I loudly applaud the provision in this policy that suggests every page should have such a phone number
- The ability to respond to requests varies greatly within EPA. There is no one willing to be the mail contact, so I don't think it should be a requirement because we don't have the resources
- This is too strict a policy. A requirement to display local office phone numbers is burdensome and counter to our need to redirect business away from local offices [and toward our 800 number].

Important Notices:

- Although we strongly support this concept, another term might be more meaningful to visitors.
- We think it's a good idea to group all these links, as it frees the valuable real estate at the bottom of the home page.
- Requiring the specific term "important notices" and having it in the footer of ever page is overkill. So long as the site has prominent and easily accessible links to this material from the home page and key navigations, it should not be necessary to do this.
- Users are not likely to think of looking for FOIA information behind a link called "Important Notices"...Further, 'Important Notices" means something entirely different to FERC's customers.

Other comments:

- Site maps should not be required because it is not possible for a three million page document site to cover every major topic. Even if this was implemented, the sheer size of the site map would be unfriendly to customers.
- Doesn't seem like a good idea to REQUIRE frequently asked questions. BUT, it is a
 good idea to specify the term to use when questions are posted and I think "common
 questions" is best.
- The term "FAQ" is not universally understood, despite its prevalence.

2c. Federal Websites Must Be Results-oriented

Positive: 2 Negative: 27 Neutral: 24 No Comment: 77

Although most comments requested clarification or further guidance, a significant number expressed concern about the lack of resources available to implement this policy. Many hoped for OMB approval of a universal survey that all agencies could use without separately going through Paperwork Reduction Act clearance procedures. Others

questioned the appropriateness of using the same survey across different sites.

Sample Comments:

- Tools such as the American Customer Satisfaction Index (ACSI), now used by dozens of Federal departments, could be adopted as a standard.
- Some agencies may already be using tools to track customer satisfaction and acquisition of a second tool may not be cost effective
- The Department of Education has been using an agency-designed online customer satisfaction survey since 1996. ED has gathered a wealth of statistical information from this survey and has the ability to track progress over time. The operation and analysis of ED's survey currently requires 0.02 FTE; no additional costs are budgeted. In contrast to other agencies that would reap cost savings, ED's costs would increase.
- We need ways to ensure that visitors who use more than one Government web site will
 not feel harassed by multiple requests that they take the survey.
- This has more to do with achieving customer satisfaction and an agency's missions and objectives than to "Content Standards". The mandate for Agency's to be "results driven" is already defined in the President's Management Agenda....restating legislatives requirement seems to have little to do with defining and publishing "Content Standards".
- A good deal more information about the process, criteria and expectations for measurement as well as the process and criteria for determining a single required customer satisfaction tool) would be needed in order to respond meaningfully to this proposed policy and implementation guidance.

3a. Common Access

Positive: 24
Negative: 1
Neutral: 0

No Comment: 95

There was general support, but many requests to clarify testing for "lower-end" technology. Others provided suggestions for additional guidance.

Sample Comments:

- Suggest that agencies limit site template download size to no larger than 50KB, with caveat that ultimate page download size, depending on the page's content, will be larger than this limit.
- AGREE in general but there are times when the greater good may be served by providing increased functionality afforded by newer technologies. This country can illafford the lowest-common denominator approach...

3b. Plain Language

Positive: 14
Negative: 1
Neutral: 0
No Comment: 105

There was general support, but many requests to provide more detailed implementation guidance. Also, some noted that it's necessary to use more technical language for specific audiences. Some suggested requiring a basic reading level 8th grade level).

Sample Comments:

- This is a good goal, but is not sufficiently detailed to be good guidance. We suggest promulgating the use of one government-wide style guide for writing style, grammar, person, voice, etc.
- Not all information is appropriate for all citizens. Part of the federal government's duty

to provide information to its citizens includes providing a forum for making technical information available to scientists and engineers. The policy should be to develop information on a level of sophistication that is appropriate to the intended audience, not ALL audiences.

· Should be a guideline and not a standard. Difficult to monitor and measure

3c. Access to Documents in Different File Formats

Positive: 16
Negative: 1
Neutral: 6
No Comment: 97

Comments on this section varied widely, although there was general support. Most requested clarification or suggested additional implementation guidance.

Sample Comments:

- Agencies should be discouraged or even prohibited from using proprietary formats that
 require citizens to use a particular software application that must be purchased and
 licensed. Whereas Adobe PDF Readers and OpenOffice applications, for example, can be
 obtained free of charge, others, such as MS Word and MS Excel, cannot.
- How about specifying that HTML native web page) is always the first choice for file
 format, followed by formats that can be used using free plug-ins or utilities, followed by
 formats that require purchased software such as Word.
- What constitutes a burden? And is it ok to require a plug in if it is the only or best) way to deliver the content? Acrobat Reader is so ubiquitous that it might not be an issue. Visitors with low bandwidth need information and appropriate warnings about how long it might take to download large files.

3d. Access to Data

Positive: 0 Negative: 2 Neutral: 3

No Comment: 115

Of the few comments, most suggested that there are times when it is appropriate to rely on proprietary formats to access data. There were no substantive sample comments.

3e. Federal Websites Must Use Consistent Navigation

Positive: 12 Negative: 0 Neutral: 6

No Comment: 102

There was general agreement on the concept, but many specific questions or suggestions about implementation.

Sample Comments:

- We strongly support these recommendations
- While we agree with the need for consistency in navigation and look, we urge the
 Working Group to consider the problems that frames can cause for some versions of
 browsers and almost always cause for printing information from web sites.
- Based on this description, it seems that there is an expectation that public sites will
 establish and proliferate a standard look-and-feel for all agency public web sites. For
 NASA that would translate to affinity with the NASA Portal. This would be very
 expensive to implement since many sites would need to be completely redesigned.

3f. Federal Websites Must Have a Search Engine

Positive: 1
Negative: 2
Neutral: 23
No Comment: 94

There was general support, but also many questions about exemptions to place a search on every page, whether using the FirstGov search is required, and the effectiveness of the service standards.

Sample Comments:

- We agree that a search capability for the entire agency site is required. However, we
 feel that requiring a search box or link from every page does not add enough
 functionality to justify having to change every page in order to comply...
- Not all pages require a search box. This is especially true of database query results and pages such as PDF files.
- Having agencies "set minimum service level standards" is unclear. Do all agencies need
 to establish them, even those who use the FirstGov search? It seems that agencies
 who use the FirstGov search should be able to refer to the FirstGov standards rather
 than developing and maintaining their own.
- Requiring agencies to establish their own standards will result in there being as many standards as there are agencies.
- Are federal sites required to use the Firstgov search engine or is it just one option? Our IT people here are under the impression that we have to use FirstGov as our search engine.

3g. Agency Web Sites Must Use Standard Metadata

Positive: 38
Negative: 0
Neutral: 0
No Comment: 82

There were mostly favorable comments. Most suggested adding additional elements most notably descriptions or variations on the suggested elements.

Sample Comments:

- In addition to "Publication Date" a "Date Most Recently Updated" tag should be required. Also, use of the Description tag should be required, since the content of this tag is often used by search engines in the results.
- Agree on the need for metadata but the selection of the standard metadata elements should be under the purview of the Categorization Workgroup. While we agree that metadata elements should be streamlined we do not agree on the application of the metatags to just the home pages and second-tier pages. This solution would not improve the discovery of content that is embedded deep within a Web site.
- We suggest a examination of today's popular search engines to determine the specific metadata they look for before we establish mandatory metadata.
- The search engine used at NASA GRC recognizes title, description, data, keywords, url, and publisher. This does not match up with the items listed. Our search engine tags cannot be changed. Each search engine is configured differently.

3h. Notifying the Public about Major Changes

Positive: 0 Negative: 1 Neutral: 8 No Comment: 111

Of the few comments, most requested clarification about the mention of a "help" page and what is meant by "major or significant" changes.

Sample Comments:

- Please make it clear that a "Help" page is not a requirement. Research has shown that the public hardly ever uses such pages.
- Please be specific when defining a "major change", and give concrete examples.

3i. Continuity of Operations During Emergencies

Positive: 1 Negative: 2 Neutral: 2

No Comment: 115

Of the few comments, a couple said this was outside of the purview of the working group; others suggested required links or processes for communicating with the public during emergencies. There were no substantive sample comments.

4a. Avoiding Duplication

Positive: 12 Negative: 7 Neutral: 4

No Comment: 97

The comments were generally mixed. Many expressed concern about the time and effort involved in esearching what content already exists. Many seemed unaware of the existence of FirstGov to assist with this research. Others were concerned about linking to cross-agency portals that aren't relevant to their website content.

Sample Comments:

- How would one agency know what already exists in order to avoid duplication? Is there
 a repository or library documentation one can review prior to proceeding? If so, who
 maintains this?
- It strikes me as somewhat naive to suggest that this problem [duplication] can be
 addressed simply by how one links. Many federal agencies have shared or overlapping
 responsibilities as part of their mission, which results in resources that often appear
 duplicative, yet still need to reside in that organization. Cases where there is genuine
 unproductive duplication of effort need to be resolved at a much higher level...I'm not
 sure it's fair to ask Web managers to play a role making these decisions.
- Sounds like a librarian's work conducting a "literature search" to see what has been done on a topic.
- It's not necessarily a bad thing to have multiple takes on the same topic available from different agencies. Also, it can be very confusing to jump back and forth between Agency sites when looking for information on a topic. I'd vote more for greater use of joint sites than greater linking.
- This makes sense, but what if the site to which we link presents the information in an unclear manner, or in a way that results in a poor user experience?
- I think we also need to suggest that agencies should avoid "stovepiping" of information or content. Federal-topical-based websites are a great example of "heading-in-the-right-direction". Agencies need more encouragement to contribute content to these single-source information websites.
- A responsible party needs to make the determination as to what information should or should not be on an agency's site. If there is a discrepancy as to which agency should provide particular content to the public, who makes the determination of responsibility?

- The intent of the policy is admirable, but the burden to implement the policy is significant without specific direction or tools.
- Without a government-wide taxonomy, it's hard to visualize how content managers are going to be able to meet this standard.

4b) Web Pages Must Link Back to the Home Page

Positive: 8
Negative: 4
Neutral: 2

No Comment: 106

The majority of comments agreed to this recommendation in concept. Most comments focused on clarification and questions about exemptions (for example, text files).

Sample Comments:

- AGREE in general, but there are pages, such as TXT pages that cannot physically contain a link.
- The wording should be clarified to indicate that it applies to the web site/collection's home page, not necessarily the agency's home page.

4c) Link to FirstGov.gov

Positive: 10 Negative: 5 Neutral: 2

No Comment: 103

The majority of comments were supportive of linking to Firstgov, but many said it is time to rename it to something more meaningful, like US.gov or USA.gov. Some objected altogether to linking to FirstGov and didn't feel it should warrant placement on the home page.

Sample Comments:

- If "FirstGov.gov" is not meaningful to most visitors, perhaps it should be replaced with another more intuitive address and text link, such as "USAGov.gov – the U.S. Government's Home Page."
- We believe that agencies should have discretion in where to place links to other government web sites. For agencies trying to maintain a "clean and lean" front page, requiring so many links on the front page is not consistent with their approach
- Since website real estate is scarce, a link to FirstGov should be optional.
- This guidance gives the appearance that FirstGov is using the ICGI process as a promotional vehicle, assuming the role of the Government's official Web portal, confusing users about the official nature of other Federal sites or portals.

5. Agencies must develop an inventory and post schedules to their websites

This is a new section that was not included in the original version, so there were no comments.

6. Existing Federal Laws, Regulations and Policies

Positive: 1 Negative: 1 Neutral: 14 No Comment: 102

For most of the specific laws in this section, there were no comments. Some asked for clarification and a few offered additional regulations related to federal public websites.

Some noted that section 508 was missing from this section. The Executive Order related to access for people with limited English proficiency generated the most comments, with several people raising concerns about resources to implement the guidance.

Sample Comments:

- Other laws that should be cited: Paperwork Reduction Act, Section 508, GPEA, FISMA
- A ccess for people with limited English proficiency: In simple English, what would have
 to be done to make web sites compliant with this law? I do not believe this would be
 practical to implement with the limited resources of our agency.
- Will there be translation resources available to small agencies that do not have a staff available to manually translate content?

7a. Ongoing Structure and Process

Positive: 5
Negative: 4
Neutral: 6

No Comment: 105

Since these recommendations were addressed specifically to OMB rather than to agencies, there were fewer comments on this section.

Sample Comments:

- The creation of a separate council that would complement the CIO council would be a great move.
- Agencies already have existing bodies which are equipped to comment on web content issues. Instead of creating a new standing committee, expertise should be drawn as needed from these bodies. Another layer of oversight is not needed.
- As a general principle, increasing reporting requirements only adds more work for the agencies and doesn't accomplish a lot.
- This deserves a policy memorandum that all agencies buy into via the CIO Council. The Federal Government has three branches of government that must be coordinated with.

8. Definitions

There were a very small number of comments on general definitions. Several people asked to clarify "agency" website, for example which requirements apply to agency top level sites, e.g., www.treas.gov and which apply to agency sub-units, e.g., www.occ.treas.gov.

Content Lead: Rachel Flagg

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Policies and Guidelines for Federal Public Websites: Recommendations of ICGI Report

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From Recommended Policies and Guidelines for Federal Public Websites: Final Report of the Interagency Committee on Government Information Submitted to the Office of Management and Budget June 9, 2004

- 1. Policy: Citizens must be able to identify official federal government websites and trust that those websites will provide current and accurate government information. Authenticity, branding, and timeliness of federal public websites are critical to maintaining public trust.
- a. Requirement: Federal Public Websites Must Use Government Domains. Every federal public website must be established in the .gov, .mil, or fed.us domain to communicate to the public that these are websites that they can trust to provide official government information. This requirement applies to any federal public website, even if that website resides on a non-federal government owned server.

Exceptions:

- · Agencies that are quasi-governmental;
- Federal websites that are developed in partnership or through grants with non-federal organizations, where content is not exclusively official federal government information;
- Federal kids websites that agencies choose to put in the kids.us domain.

Rationale: Many websites exist that resemble government websites or that appear to provide "official" government information. They can mislead the public into believing and acting on erroneous information.

Visitors looking for official government information must be confident that is what they are getting. The federal government must ensure that public websites are clearly branded. Using domains that are exclusive to the government is one way to communicate to citizens that federal public websites are legitimate.

The .mil, .gov, and fed.us domains are restricted to government agencies. Using these exclusive domains assures the public that these are official government websites and that a government agency is accountable for the website's content. Using these exclusive domains also will ensure that the FirstGov search engine [now USA.gov search engine] will find all official federal websites and that the FirstGov [now USA.gov] directory of federal public websites will list them.

Implementation Guidance:

Toolbox



Download Plug-ins

In This Report

- Summary
- Background
- Recommendations
- **Attachments**
- Comments

Organizations must register their websites in the .gov, .mil, or fed.us domain and follow existing domain registration policy and procedures under <u>41 CFR Part 102-173</u> and Defense Data Services Management Bulletin 9605 24 September 1996.

- Some organizations that have been using and have publicized other domains (such as .edu, .org, and .com) may retain those domains and domain names, using them as an "alias." However, those organizations must register a .gov, .mil. or fed.us domain as their official domain; and they must host their content on the official domain. They can use an automatic redirect from the alias to the official domain.
- Websites established after these requirements go into effect must use the .gov, .mil, or fed.us domains.
- The Web Content Management Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: Immediately, for new websites. December 31, 2007, for existing websites.

b. Requirement: Federal Public Websites Must Show U.S. Sponsorship. Every federal public website must clearly display the name of the agency or organization that sponsors the website on every web page. If the agency or organization title does not include "United States," then the web page must show other wording to indicate that the U.S. government sponsors the website.

Exceptions:

- · Pages or files reprinted from outside sources are exempted.
- · PDF files are exempted.
- Cross-agency portals do not have to show the name of each agency on each page;
 however, they must include wording to show U.S. sponsorship

Rationale: Visitors want to be sure that they are getting official government information, when that is what they seek. Agency or organization titles alone do not always convey that they are part of the U.S. Government. Therefore, it is important to use "United States" or "U.S." if it is an official part of the agency or organization's name. If it is not, it is important to convey in some other way that the U.S. Government sponsors the website.

Sponsorship must be noted on every page because visitors do not always come through the "front door." Many visitors enter a website at a second, third, fourth, or lower level. Thus, it is important to ensure that visitors can identify the sponsorship of a web page, no matter where they enter the website.

Implementation Guidance:

- Websites must use one of the following practices to indicate sponsorship:
 - The full name of the agency or organization, including "United States" or "U.S."
 - The agency or organization's name AND a statement that this is an official U.S. government website (if the agency or organization name does not include "United States")
 - A logo that incorporates the official name of the agency AND sponsorship by the U.S. Government. If a logo is used, the name of the agency and U.S. sponsorship must be plain enough that visitors can recognize the words easily.
- Website homepages and major entry points must include a title tag with the agency's full name or a commonly accepted shortened version that the public will recognize. The organization name may precede or follow the page title in the title tag.
- Cross-agency portals must include wording on each page and in the title tag to show U.S. sponsorship.
- The Web Content Management Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2007

- c. Requirement: Federal Public Websites Must Follow Basic Common Linking Practices. Federal public websites must follow these requirements when linking to other websites:
- 1. Linking Policy: Organizations must develop and post a clear and comprehensive policy

for linking to other websites. Policies must include criteria or guidelines for selecting links to non-federal government websites. Linking policies must be available, at a minimum, from the website's "Web Policies and Important Links" page.

- 2. Notification: Federal public websites must notify visitors when they are leaving the website for a non-federal government website. Federal public websites may notify visitors when they are leaving the website for another federal government website.
- 3. Disclaimers: Federal public websites must disclaim responsibility for the content and privacy policies used by non-federal government websites. In the interest of seamless government and maintaining the general public's trust, federal public websites must not disclaim responsibility for the content of other federal public websites.
- 4. Review: Organizations must review external links on an established schedule to make sure they still work and that they are still appropriate. The schedule must be included in the linking policy.

Exceptions: Organizations are not responsible for maintaining links contained in documents or reports belonging to another organization or entity that are republished on the website.

Rationale: Linking to outside websites-both federal and non-federal-can add real value to a website, but organizations must manage links effectively.

- The public needs to know how an organization chooses its links.
- Links need to work, and they need to lead the visitor to additional information related to a particular topic.
- Visitors expect federal public websites to take them to other websites that will be helpful. Web content managers of federal public websites have a responsibility to their visitors to ensure that they select links that fulfill that expectation.
- Linking to other websites reduces duplication of content. Content should be posted once by agencies with the greatest expertise and used by other agencies and portals, through links.
- All federal public websites must meet certain requirements mandated by laws, regulations and policies; therefore, it is safe to send a visitor to another federal public website, without a disclaimer. Moving from one federal public website to another should be as seamless as possible.
- When sending a visitor to a non-federal website, owners of federal public websites
 have a responsibility to inform visitors that the website they are going to does not
 necessarily operate under the same laws, regulations, and policies as federal websites.
- Linking to another website is valuable since it brings additional visitors to the website.
 Web content managers of federal websites must have clear and fair criteria for deciding which links they will use, particularly when they are asked by another website owner to establish or trade links.

Implementation Guidance:

- Agencies must establish a process and schedule for reviewing existing links to make sure that they work and that they still add value. Organizations should review links monthly or quarterly, at a minimum. Websites with a large number of external links, such as portals, should be reviewed more often.
- · Options for notifying visitors that they are leaving the website include the following:
 - Placing an icon next to the link;
 - Identifying the destination website in the link text or description itself;
 - Inserting an intercepting page that displays the notification, after the user selects the link; and
 - Displaying all non-federal links in a separate listing from federal links.
- Organizations may use the same notification process for links to federal websites.
- Organizations that currently disclaim other federal websites must remove disclaimers.
- Examples of linking policies, disclaimers, and link notifications will be available on the Web Content Management Toolkit website.

Implementation Deadline: December 31, 2005

d. Requirement: Federal Public Websites Must Be Current. Every homepage, navigational page, and document on a federal public website must have a date showing that it is current, that it has been reviewed within the past 12 months, or that it is a

historical document. Content that is obsolete and is not required by law or regulation should be removed or archived, in compliance with the organization's records management schedules.

Exceptions:

- If a document is reproduced from another entity and cannot be altered to add a posting date or notification that it is an historical document, it is exempt.
- Existing documents (not homepages or navigational pages) are grand-fathered;
 however, as time and resources permit, organizations should date those documents,
 too.

Rationale: Citizens, businesses, and other governments expect the information on federal public websites to be valid, accurate, and current. Researchers, media, students, and others need to cite dates.

Implementation Guidance:

- There are several options for implementing this requirement.
 - Date Posted: If the page or document has been posted within the past year, the
 "date posted" may be adequate. Documents older than one year may appear out-ofdate. At that point, it would be advisable to go to a "last reviewed" date to show
 that the content remains current.
 - Date Last Modified or Updated: If the page or document has been modified or updated in the past year, the "date last modified" or "last updated" may be adequate. Again, content older than one year should be reviewed and the review date should be noted. Organizations do not need to change the date last modified or updated for corrections of spelling or typographical errors.
 - Date Last Reviewed: Unless a document is historical, if content is more than one
 year old, it should be reviewed. The date of that review can be used to show that
 the content is current.
 - Date Last Certified: Some agencies use a quarterly or annual certification process to
 ensure that all content is reviewed regularly. In that case, the date of the last
 certification can be used to show the content is current.
 - Historical Document: For pages or documents that will never change, such as news releases, official reports, final rules, etc., the date of publication can be used, along with a notation that this is a "historical document."
- It is not essential to put the date on every page of a document, though it is desirable.
- PDF documents should either be dated or the date should appear in the link to the PDF.
- Organizations should adopt a routine review process-monthly, quarterly, semi-annually, or annually-to identify obsolete content and remove it.
- The Web Content Management Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Date: December 31, 2007.

- 2. Policy: Federal public websites must be written and organized from the audiences' point of view. Websites must be written and organized from the point of view of the audience. When a website's intended audience is a specific group-scientists, residents of a particular military base, or business partners, for example-it also must include information for citizens, as a whole. When a website is available to the public and is funded by tax dollars, then citizens-as a whole-deserve certain basic information: who operates the website, its purpose, how it serves them, and how they can find out more-presented in terms they can understand.
- a. Requirement: Content Must Be Organized in Ways That Make Sense to Citizens and Intended Audiences. Federal public websites must be organized by subject (topic, tasks, services, life events), by audience group, by geographic location, or by any combination of these factors, as the primary navigation. In some cases, federal public websites may include navigation based on organizational structure; however, that must not be the primary navigation structure of the website. Web content managers must analyze the wants and needs of both citizens and other intended customer groups when organizing the content of federal public websites.

Exceptions: There are no exceptions.

Rationale: Usability tests and customer satisfaction reviews indicate that most web visitors-both citizens and other audience groups-are familiar with navigating websites by subject, audience, or location. These are the preferred ways to organize a federal public website. Focus groups and other feedback indicate that citizens do not know-nor do they want to know-how the government is organized to get the information and services they want. Creating navigation according to organizational structure is not the best way to design a website for citizens. If a federal website is available to anyone, then citizens-as a whole-are part of the audience and the website must be organized in ways that help them use it.

Implementation Guidance:

- Web content managers should use a variety of means to determine the best way to organize information for citizens and other customers, including:
 - · Usability testing and research;
 - · Customer satisfaction surveys;
 - · Focus groups;
 - Email, phone calls, letters, and other contacts with the public;
 - · Talking with intended audiences;
 - · Talking with other web content managers; and,
 - Analyzing web reports, including search terms and statistics.
- Some federal public websites focus on special audiences, such as specific business
 partners or other government organizations. Using an organizational structure as a
 secondary navigation may be desirable when those intended audiences are familiar with
 that structure.
- · Because audiences' needs change, testing and analysis should be an ongoing effort.
- The Web Content Management Toolkit website will provide more specific resources, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2007

b. Requirement: Homepages Must Be Written and Organized from the Viewpoint of the Public. The purpose of the homepage must be to help the public get to the content they need and want most. Homepages must be designed to feature the most requested information and services. Even if the public is not the primary intended audience of a website, the homepage must provide an easy-to-identify section where the purpose of the website and the value to citizens is explained in terms they can understand.

Exceptions: There are no exceptions to this requirement.

Rationale: Federal websites need to focus on helping the public find the services and information they want and need. The homepage is the main tool for sending visitors in the right direction. Web visitors want fast, efficient service. They want to find what they seek in the first screen. They do not want to be distracted by text or graphics that do not help them find what they want and that increase download time. Homepages must anticipate the wants and needs of the public. Homepage space, therefore, must be designed carefully and effectively to provide the very best customer service. Citizens-as a whole-are an audience for federal public websites funded by taxpayer dollars.

Implementation Guidance:

- Web content managers must assess their audiences' wants and needs to determine the content of the homepage. There are many options available to determine what audiences want and need:
 - · Customer satisfaction surveys;
 - · Focus groups;
 - Email, phone calls, letters, and other contact with the public;
 - Talking with intended audiences;
 - · Talking with other web content managers; and,
 - · Analyzing web reports, including search terms and statistics.
- Usability testing can help web content managers organize information in the most effective way.
- The most requested information should be featured prominently, including online services and public use forms.

- Homepages should not feature photos of executives or employees of the organization.

 Those photos may be appropriate on the "About Us" or "News" page.
- Additional guidance-including examples and best practices-will be provided on the Web Content Management Toolkit website.

Implementation Deadline: December 31, 2005

c. Guideline: Federal Public Websites Should Not Be Used for Employee Information. Federal public websites should contain information and services for the public. As a rule, they should not be used to convey information specific to that agency's employees. Intranets or extranets should be used to inform employees.

Exceptions: In emergencies, federal public websites may be used to inform both employees and the public about the status of operations.

Rationale: The public can be confused by instructions intended for employees. As a rule, federal public websites should be aimed at the public-not at federal employees of that agency.

Implementation Guidance:

- If content specifically for employees exists on federal public websites, it should be moved to an intranet or to an extranet, with password protection.
- If the agency or organization does not have and cannot acquire an intranet or extranet, then employee information should be isolated and carefully labeled, to show the public that it is not intended for them.
- Additional guidance and examples will be provided on the Web Content Management Toolkit website.

Implementation Deadline: December 31, 2007

d. Requirement: Federal Public Websites Must Use Basic Common Content, Terminology, and Placement. Federal public websites must incorporate common content, including common terminology and placement where specified.

Exceptions: Exceptions are noted under each item below.

Rationale:

- Many citizens visit more than one federal website. Usability studies have shown that
 using common terms and placement of content can help visitors who go to multiple
 websites identify what they want more quickly and easily.
- Citizens expect to find certain basic information on every federal public website, including something about the organization, some way to contact the organization, quick answers to common questions.
- The E-Government Act of 2002 requires that certain content be available to citizens, including the mission, organization, and strategic plans of federal agencies.
- Recent laws and regulations have placed a number of requirements on all federal public websites, including privacy policies, links to FOIA pages, accessibility policies, "NO " data, and more. By using common terminology and placement of this information, citizens will know where to look for it on each federal public website.

Implementation Guidance: Requirements are provided under each specific item below. Additional guidance-including examples, best practices, and resources-will be available on the Web Content Management Toolkit website.

- (1) Contact information. Federal public websites must have a page entitled "Contact Us" or "Contact (Organization Name)." That page must be linked from the homepage and every major point of entry, using the page title as the link text. Contact information must include all of the following, at a minimum:
- · Organization mailing address;
- Street addresses for any regional or local customer service offices;
- Phone number(s), including numbers for any regional or local offices or toll-free numbers and TTY numbers, if available;
- Means to communicate by electronic mail (for example, email address(es) or webbased contact form);
- The organization's policy and procedures for responding to email inquiries, including whether the organization will answer inquiries and the expected response time;

- Contact information to report data problems required by the Information Quality regulations,
- Contact information for small businesses, as required by the Small Business Paperwork Relief Act:
- Instructions on how to request information through the Freedom of Information Act (FOIA); and
- Contact information for reporting both technical and content problems with the website, including accessibility problems.

Exceptions: Organizations connected with national security, defense, and law enforcement may choose or be required to not include names, addresses, and phone numbers of offices and officials, including contact officials. However, they should provide some secure way for citizens to contact them.

Rationale: Citizens expect to be able to contact any federal government organization to ask questions, get information, or report problems. It is important to provide some means for them to do that.

Implementation Guidance:

- While the "Contact Us" link is required from the homepage and major entry points, it is
 desirable to include that link on every page.
- Organizations that need assistance in managing public inquiries should consult the USA Services Program, administered by GSA, which offers email, phone and publication distribution services.
- If TTY lines are not available, the agency can use the Federal Relay Service.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement, including examples of additional desiredbut not required-information, such as a searchable online "phone book," showing both phone numbers and email addresses of employees.

Implementation Deadline: December 31, 2005

- **(2) Organizational information.** Federal public websites must have a page entitled "About Us" or "About (Organization Name)." That page must be linked from the homepage, using the page title as the link text. The page must provide basic information about the sponsoring organization. At a minimum, it must include all of the following:
- A description of the organization's mission, including its statutory authority (required by Section 207 (f)(1)(A)(i) of the E-Government Act of 2002);
- Strategic plan (required by Section 207 (f)(1)(A)(iv) of the E-Government Act of 2002);
- Organizational structure (required by Section 207 (f)(1)(A)(iii) of the E-Government Act of 2002);
- Basic information about parent and subsidiary organizations and regional and field offices, as appropriate;
- Name of the agency head and other key staff, as appropriate; and
- · Contact information, as described in section 2d(1)

Exceptions:

- Cross-agency portals are exempt from all items except contact information; however
 portals should include a description of the purpose of the portal, its intended audiences,
 sponsorship, and any strategic plans for the portal.
- The Central Intelligence Agency and other agencies cited in Title 5, Part 1, Chapter 3, Section 306(f) may be exempt from posting strategic plans.

Rationale: The public, including students and researchers, often wants to know something about the organization that sponsors a public website. The E-Government Act requires specific information that must be included on all federal public websites, and several of these are appropriately categorized under "About Us." It will help visitors find this information if every federal public website puts it in that same category.

Implementation Guidance:

- Small organizations that do not have a specific mission or strategic plan should link back to the parent organization's mission and plan
- On kids' websites (other than kids.us websites), the "About Us" link can go to

- · The parent organization's "About Us" page, or
- An "About Us" page written for kids. If an organization chooses this option, the
 "About Us" page still must include a link to the parent organization's "About Us"
 page, for the benefit of parents who may want to know more about the sponsoring
 organization.
- Kids' pages developed in the kids.us domain may publish the URL of the parent organization's "About Us" page.
- Though the "About Us" link is required only on the homepage, it is desirable to include it on all major entry points.
- If possible, the organization chart should be interactive, allowing visitors to find additional details about components of the organization.
- The organization's mission and plans should be written or explained in terms that citizens can understand.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement, including examples of additional desired-but not required-information, such as organization history and budget information.

(3) Site Map or Subject Index. Every federal public website must have a page entitled "Site Map" or a page entitled "Subject Index" that gives an overview of the major content categories on the website. At a minimum, there must be a link to the Site Map or Subject Index from the homepage, using those words as the link text. Site Maps and Subject Indexes must be kept current so they are useful.

Exceptions: There are no exceptions to this requirement.

Rationale: The public needs to be able to find the information and services they seek, as easily as possible. Even on small public websites, a Site Map or Subject Index can give them a quick and easy way to find what they want. Usability testing on the terms "Site Map" and "Subject Index" show that the public understands these terms, so organizations must use them.

Implementation Guidance:

- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.
- Web content managers should establish a schedule or process for reviewing and updating the Site Map or Subject Index.
- A Subject Index will be most useful to visitors if it incorporates terms they commonly
 use. Web content managers should review common search terms and frequently asked
 questions to help construct a Subject Index.

Implementation Deadline: December 31, 2005

(4) Common or Frequently Asked Questions. Federal public websites must have a page for answers to frequently asked questions. That page must be linked from the homepage and every major entry point, using the title of the page as the link text. This page must provide basic answers to questions the agency receives most often.

Exceptions: There are no exceptions to this requirement.

Rationale: Though web content managers do their best to write and organize their websites to anticipate all questions, it is an impossible task. Visitors still have questions because they couldn't find something, because they didn't understand something, or because it isn't there. A list of answers to common questions can be a big help to the website audience.

- There are several ways for web content managers to compile a list of common questions and answers:
 - · Look at email, phone calls, and letters from the public
 - Conduct a survey
 - · Arrange focus groups
 - Talk to the people who answer phones and mail at the organization
 - · Look at statistics
 - · Look at information requested under the Freedom of Information Act

- · Review top search terms
- Existing usability research shows the acronym, "FAQ," is not well recognized.
 "Frequently Asked Questions"-spelled out-is the most common terminology used, but there is no consensus on whether the public views it as the best terminology. The Web Content Standards Working Group will perform usability testing on preferred terms and placement of links to this page. In the meantime, organizations should avoid using the acronym.
- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.

(5) Online Services. Federal public websites must offer easy access to online services, displaying them as prominently as possible.

Exceptions: There are no exceptions to this requirement.

Rationale: Website visitors want self-service, and they want it fast. They want to know-right away-what they can do on the website to help them solve their problems or achieve their goals. Agencies can save time and money and by putting services online. To be effective for visitors, federal public websites must prominently display the most requested and most used online services, so visitors can find out what the website can do for them.

Implementation Guidance:

- Web content managers should identify the most commonly requested and commonly used online services on their websites and make sure that they are advertised prominently and can be reached quickly.
- As new online services are added to the website, they should be highlighted appropriately.
- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.

Implementation Deadline: December 31, 2005

(6) Forms and Publications. Federal public websites must offer easy access to public use forms and current publications and link to appropriate federal portals that offer forms and publications for the public.

Exceptions: The only exception to this requirement is a website for an organization that has no public use forms and publications.

Rationale: Website visitors want fast, easy service-24 hours a day, 7 days a week. They do not want to have to wait until an organization is open for business. They do not want to wait in line or on the phone to get forms and publications they need to accomplish their objectives.

Implementation Guidance:

- Public use forms and current publications should be available on federal public websites, or through links to portals, so that citizens can get them when they need them.
- Federal public websites that offer forms must link to related portals. Currently, fedforms.gov is the forms portal.
- Federal public websites that offer publications must link to portals that offer related publications. Currently, pueblo.gsa.gov and gpoaccess.gov are publications portals.
- If forms or publications or both are not available for viewing, downloading, or completing online, then-at a minimum-the website must provide instructions on how to order them.
- Access to public use forms and publications should be obvious on the website.
- · Websites should provide public use forms in a fillable format, if possible.
- The Web Content Management Toolkit website will provide additional guidance, including specific examples and best practices, for implementing this requirement.

Implementation Deadline: December 31, 2005

(7) Jobs. Agency websites must include information about jobs at the organization, along with a link to the USA. Jobs website.

Exceptions:

- · Kids' websites are exempt.
- While a jobs section is a requirement for agency websites, it is a guideline for smaller websites.

Rationale: Job seekers and curious citizens want to know basic information such as what jobs are available, how to apply, and what it's like to work in federal organizations.

Implementation Guidance:

- In addition to the link to USAJobs, federal public websites for large, high-level organizations should include information about working at that organization, special jobs programs like internships and work-study, No Fear Act data, and other information particular to that organization.
- Though they may have unique circumstances, agencies staffed only by appointees, small organizations, and portals should also explain how jobs are filled.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this guideline.

Implementation Deadline: December 31, 2005

(8) Information about Regulations. Every organization that issues regulations must provide information about those regulations on its website and link to the "Regulations.gov" portal.

Exceptions: There are no exceptions to this requirement.

Rationale: The President's Management Agenda makes it a priority to inform the public about pending regulations and provide them an opportunity to be involved in rulemaking. It helps citizens to be more involved in their government.

Implementation Guidance: The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement.

Implementation Deadline: December 31, 2005

(9) Information about Grants and Contracts. Every organization that provides grants or has contracting opportunities must provide information about those opportunities on its website and link to appropriate cross-agency portals.

Exceptions: There are no exceptions to this requirement.

Rationale: The President's Management Agenda makes it a priority to standardize and automate the grants application process and to centralize federal contracting opportunities in cross-agency portals. All federal organizations must support those portals.

Implementation Guidance:

- Organizations that post grants information must link to grants.gov.
- Organizations that post contracts information must link to federal portal(s) with contracting information related to that organization.
- If an organization has significant grants or contracts available, it may be appropriate to showcase that information-or a link to that information-on the homepage.
- Web content managers should conduct usability studies to determine the best terms to use and places to locate this information
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this requirement.

Implementation Deadline: December 31, 2005

(10) Required Website Policies and Links: To help visitors find website policies and links required by laws and regulations, federal public websites should use common terminology and placement.

Exceptions: The policies and links in this section are required by laws and regulations. The terminology and placement of required links and policies are guidelines.

Rationale: The more federal public websites that follow the same practices for naming and placing important information, the easier it will be for citizens to find that information as they move from one website to another.

Implementation Guidance:

• Federal public websites should have a page for website policies and important links.

The recommended location for a link to this page is at the bottom of every page.

- Federal public websites must include a link to an organization's **privacy policies** on every page. (See item 6a for more details about this requirement.) The recommended name for that link is "Privacy Policy." The recommended location for that link is at the bottom of every web page and on the page containing website policies and important links. PDF files are exempt from this linking requirement.
- Federal public websites must provide the organization's **policies for accessibility** (see item 6c for more details about this requirement). The recommended location for this policy or a link to this policy is on the page for website policies and important links.
- Federal public websites must have a link from the homepage to the Freedom of Information Act page (see item 6d for more details about this requirement). The recommended name for that link is being tested, and the recommended locations are at the bottom of the homepage and on the page containing website policies and important links.
- Federal public websites must provide the organization's policy for linking to outside
 websites (see item 1c for more details about this requirement). The recommended
 location of this policy or a link to the policy is on the page containing website policies
 and important links.
- Federal public websites must inform the public about the digital rights, copyrights, trademarks, and patents policy (see item 6j for more details about this requirement). The recommended location of this policy or a link to this policy is on the page containing website policies and important links.
- Federal agencies must provide information required by the "No Fear Act" (see item 6l for more details about this requirement). The recommended name of this page is being tested. The recommended locations for links to this information are the "Jobs" page, if one exists, and the page containing website policies and important links.
- Federal agencies subject to the Paperwork Reduction Act must post their policies to
 implement the "Information Quality Guidelines" on their public websites (see item
 6e for more details about this requirement). The required location for links to that
 information is the page containing website policies and important links. The "Contact
 Us" page must also include contact information to report data problems, as required by
 the Information Quality guidelines.
- Federal agencies must provide general information about their security protocols to
 protect information (see item 6b). The recommended location of this policy or a link
 to this policy is on the page containing website policies and important links.
- Federal agencies must post their schedule for publishing information on their
 websites required by Section 207(f)2. The recommended location of this schedule or a
 link to this schedule is on the page containing website policies and important links.
 (See Section 5 for more details about this requirement.)
- The Web Content Standards Working Group will conduct usability testing for the names and locations that do not already have supporting data, including a name for the page containing website policies and important links.
- The Web Content Management Toolkit website will provide specific examples and best practices for implementing this guideline.
- If additional policies and links are required, the recommended Web Content Advisory Council will review them and recommend common names and locations.

Implementation Deadline: December 31, 2005

e. Requirement: Organizations Must Measure Customer Satisfaction and Usability of Federal Public Websites. Organizations must evaluate customer satisfaction and usability of their websites and use the assessments to improve the websites. Federal public websites that reach the widest audiences-including agency websites and all second-level domain names registered in .gov, .mil, or .fed.us-must use a standard customer satisfaction survey.

Exceptions: There are no exceptions to this requirement.

Rationale: Organizations that create federal public websites, and the citizens they serve, want these websites to be as useful as possible. While web content managers do their best to write and organize their websites to be effective, they need to test their websites to identify problem areas and then fix those problems. A common customer satisfaction survey will reduce costs government-wide and compare government websites with each

other.

Implementation Guidance:

- Web content managers must measure both the usability and customer satisfaction of their websites. There are a number of options for doing that, and they will be identified on the Web Content Management Toolkit website.
- Federal public websites that reach the widest audiences, including agencies' websites
 and all websites that are registered under a second-level domain in .gov, .mil, or
 .fed.us must use a standard customer satisfaction survey. OMB will select the survey
 through a competitive process.
- Agencies should include a summary of their customer satisfaction survey results in their annual report to OMB, which documents compliance with requirements from the E-Government Act of 2002. (See item 7d.)

Implementation Deadline: December 31, 2005

3. Policy: Federal public websites must be designed and written to ensure they are easy to access and use. All federal public websites must be designed and written to ensure that the audiences for whom they are intended can easily access and use those websites. Organizations must consider the needs of a broad range of visitors, including (but not limited to) the general public, specialized audiences, people with disabilities, those without access to advanced technologies, and those with limited English proficiency. While organizations should ensure broad accessibility and usability, this should not limit them from providing information and services for specialized audiences, or from pursuing advanced technologies that will improve the website for future visitors.

Note: Requirements related to accessibility for people with disabilities and people with limited English proficiency are included in Section 5 of this document, which addresses existing laws, regulations, and other requirements.

a. Requirement: Federal Public Websites Must Provide Common Access. Federal public websites must be designed, developed, and tested for a broad range of visitors, including those with lower-end hardware and software capabilities.

Exceptions: There are no exceptions to this policy.

Rationale: To ensure that all citizens have access to U.S. government information and services, federal public websites should attend to the needs of a broad range of visitors, including those without reasonable access to advanced technologies. While more and more visitors have access to higher-end technologies, a significant percentage of the public still uses relatively low connection speeds, lower screen resolutions, and prefers a variety of different Internet browsers.

Implementation Guidance:

- Federal public websites should be designed, developed, and tested for multiple browsers and versions of browsers, operating systems, connection speeds, and screen resolutions, based on an analysis of an organization's website visitors.
- Organizations should balance the needs of visitors who use lower-end technologies with the need to pursue more advanced technologies and the added functionality those technologies may provide.
- Organizations should review visitors' technological needs at least semi-annually (using
 web analyzer tools or other analytic data) to ensure that websites continue to meet the
 needs of their intended audience. The Web Content Managers Online Toolkit will provide
 regularly updated data about public web use, but organizations are also encouraged to
 review data specific to their own website visitors.
- To accommodate visitors with low connection speeds, federal public websites should, to the maximum extent feasible, minimize page download times for their visitors. In most cases, HTML pages should not exceed 100 KB.
- Organizations should not use certain web design technologies (such as Flash) if their intended audience generally cannot and does not have access to those technologies.

Implementation Deadline: December 31, 2005

b. Requirement: Federal Public Websites Must Be Written in Plain Language.Organizations must ensure that-at a minimum-homepages, all major entry points, and navigational elements of federal public websites are written in plain language. Plain language is language the website's typical visitor can understand in one reading; it is

writing designed for the reader. Organizations should assume that the intended audience for homepages is the general public.

Rationale: Writing in plain language-language designed for the intended reader-ensures that federal public websites communicate effectively. Poor writing that does not communicate effectively wastes the reader's time, often fails to achieve its purpose, and is poor customer service.

Implementation Guidance:

- Organizations should review their homepages, major entry points, and navigational
 elements to ensure they are written in plain language, considering the website's
 intended visitors. All organization homepages should assume that the general public is
 the intended audience.
- Organizations should use language tools, including language software, to evaluate the readability of the website's content.
- Organizations should test language with typical visitors.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2005

c. Guideline: Federal Public Websites Should Provide Access to Documents in Appropriate File Formats. Federal public websites should provide access to documents using open, industry standard web formats or using alternative formats that do not impose an unnecessary burden on the intended audience. Organizations should base their choice of file formats on both the needs of their intended audience(s) and the business needs of the organization.

Rationale: Presenting documents in open, industry standard formats allows universal access, since every person with a browser can read these and the full contents of these documents are easily retrievable using web search engines. Usability studies have shown that visitors can become frustrated and are less likely to access information that requires downloading with additional software or plug-ins, even if that software is freely available, because it involves extra time and effort to view the material. In addition, many proprietary files are so large compared to industry standard formats that visitors with slow connection speeds cannot download them. Certain software and plug-ins also pose difficulties for persons with (primarily) visual impairments.

- When choosing file format(s), organizations should consider: (1) the intended use of the material by the website's visitors; (2) the frequency of use by the website's visitors; (3) the accessibility of the format to the website's visitors; and (4) the level of effort and time required by the organization to convert the material to the format.
- In general, industry standard formats (HTML and XML are current examples) provide
 the greatest flexibility for visitors and should be the primary formats for documents on
 federal public websites, especially those that are most frequently accessed by the
 public.
- Portable Document Formats (PDF), such as Adobe Acrobat, should be used only as an
 alternate format to industry standard formats and when there is a clear business need
 to use this format. For example, PDF format is an appropriate format when it is
 important to retain the original formatting of a document, such as forms or brochures.
 When using PDF files, organizations must provide a link to the downloadable free
 viewer. To ensure maximum accessibility, organizations should also provide a version of
 the document in an industry standard format, such as HTML, whenever feasible.
- Organizations should avoid making documents available only in proprietary formats that
 require purchase or licensing of commercial software (for example, MS Word, MS
 PowerPoint). If organizations must use these formats, they must ensure that the
 intended audience is known to have ready access to the appropriate software or they
 must provide a link to download the appropriate viewer or plug-in.
- When linking to a document in an alternative format (such as PDF or MS Word),
 websites should include a text description of the document, including the name, file
 type, file size, and effective date (using one of the date options in Recommendation
 1d). This will ensure that visitors have a reasonable understanding of what to expect

when they view the material and that search engines can easily find it.

- In most cases, large or complex documents (generally, more than 10-15 pages),
 whether in an industry standard format or alternative format, should be organized into
 sections or chapters and linked together. Organizations should also provide a link to
 download the entire document since some readers may prefer to print the entire
 document for later reading.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this quideline.

Implementation Deadline: December 31, 2007

d. Guideline: Federal Public Websites Should Provide Appropriate Access to Data. Federal public websites that provide material and data for downloading by the user for off-line analysis or manipulation should provide the data in open, industry standard formats or in alternative formats that do not impose a burden on the intended audience.

Rationale: Visitors to federal public websites need to be able to efficiently download available data in a format that allows them to effectively aggregate and disaggregate the data.

Implementation Guidance:

- When choosing the format(s), organizations should consider: (1) the intended use of the data by the website's visitors; (2) the frequency of use by the website's visitors;
 (3) the accessibility of the format to the website's visitors; and (4) the level of effort and time required by the organization to convert the data to the file format.
- Open files (raw data) provide the greatest flexibility for visitors and are generally preferred over proprietary formats that require specific commercial software.
- A proprietary format (for example, SAS, SPSS, SQL, MS Excel etc.) should be used only
 if the format provides functionality not otherwise available. If organizations must use
 these formats, they must ensure that the intended audience is known to have ready
 access to the appropriate software or they must provide a link to download the
 appropriate viewer, plug-in, or software.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this guideline.

Implementation Deadline: December 31, 2007

e. Requirement: Federal Public Websites Must Have Consistent Navigation. To promote ease-of-use for all citizens, federal public websites must have a navigation scheme that is used consistently across the website.

Exceptions: There are no exceptions to this requirement.

Rationale: Consistent navigation makes websites easier to use because visitors don't have to learn a new navigation scheme on each new page. Visitors are more likely to get what they need from a website if they are familiar with its navigation scheme.

- Common items that appear on every organization page should, if possible, be in the same location on each page and have the same appearance and wording. A navigation item that is shared by a group of pages (such as a set of pages on a single topic, or for a division of the organization) should also have the same location, appearance, and wording on each page.
- Navigation items of the same type should also look and behave the same way. For
 example, if a set of pages on one topic has subtopic links in the left navigation bar,
 pages on other topics should also have subtopic links in the left navigation bar that
 look and behave identically.
- If a particular set of web pages requires specialized navigation, you should apply that navigation to the largest possible logical grouping (such as a topic, an audience, or a complete organizational unit).
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

f. Requirement: Federal Public Websites Must Have a Search Engine. Federal public websites must include either a "search box" or a link to a "search" page on every page. The search engine must allow visitors to search all files on the website that are intended for public use. Organizations must provide search results in an easy-to-read format, set minimum service level standards for their search capabilities, and monitor how well they are able to meet those standards.

Exceptions: Small websites, typically narrow in scope and under 200 pages, are not required to have a search engine and may find substituting a Site Map or Subject Index serves as well or better than a search engine.

Rationale: Visitors expect to have a "search" available since it is a standard feature on almost every website. Effective search functionality is critical for accessing the depth and breadth of information made available on federal public websites. This is especially true for information not readily accessed using the "browse" functionality, such as information located in organization databases. In addition, Section 207(f) of the E-Gov Act of 2002 requires minimum goals related to search relevancy and speed of retrieval of results.

- Search box Federal public websites must include either a "search" box or a link to a
 "search" page from every page of the website. The search box or link must be entitled
 "search." Usability studies demonstrate that search boxes are most effective when
 placed in the same position on all pages (usually within the upper third of the
 webpage).
- Acceptable search engines Acceptable search engines include commercial search
 engines, search engines that operate as a web service (application service providers),
 search engines developed by the organization, or the FirstGov [now USA.gov] search,
 the free search index available at no cost to federal agencies.
- **Display of Search results** Search results must be displayed in an easy-to-read format that, at a minimum, shows visitors the term(s) they searched for and highlights the term(s) in each search result.
- Scope of Search Index Organizations must determine the scope of its search index to determine which content should be included and which content should be excluded. Organizations must ensure that existing content intended for use by the general public is made available using the website search engine, to the maximum extent allowable by the organization's search technology. This includes providing access to searchable public databases whenever feasible. Content that contains information not intended for the public should be excluded from the search engine index. Organizations must ensure that sensitive, restricted, or classified information or information that contains personally identifiable information (such as social security numbers) is not included in any web-based file that could be retrieved using a government-owned or commercial search engine.
- **Service level standards** Organizations must meet minimum service level standards for their search engines in the following areas:
 - Frequency of Search Indexing In most cases, organizations should index the
 content of their website(s) at least once a month. Content that is added and
 updated frequently, such as press releases, should be indexed more frequently;
 however, content that changes infrequently, such as archived or historical
 documents, may be indexed less often.
 - Response time On average, search engines should produce results in less than
 three (3) seconds. Organizations should monitor and log search response times and
 ensure that adequate hardware and software capacity is available to achieve the
 response time standard.
 - Relevancy Every organization should routinely identify the common search terms
 used on their website, evaluate the relevancy of their search results for those terms,
 and configure their search services to provide the best ranking possible.
 Organizations should conduct this review at least quarterly.
- "Advanced" or "Refined" Search Although usability research indicates that very few
 people use "advanced" search features, organizations should allow visitors to conduct
 more refined, focused searches to achieve more relevant results. For example,
 organizations may wish to provide options for searching within certain sets of
 information, databases, or applications.

- **Broader Searches** Organizations may also wish to provide options for broadening searches beyond the individual website. This may include a search of a "parent" organizational unit or a search of the entire federal government using the FirstGov [now USA.gov] search.
- **Search Tips** Given that many people are unfamiliar or unskilled at using search technology, organizations should provide help, hints, or tips, and include examples.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

- g. Requirement: Federal Public Websites Must Use Standard Metadata. Federal public websites must include the following metadata on the homepage and all major entry points:
- Title (this is different from the HTML title tag)
- Description
- · Creator (the content owner; this should be the name of the organization)
- Creation Date (original creation date)
- · Last Reviewed Date
- Language

Exceptions: There are no exceptions to this requirement.

Rationale: Metadata provides a standardized system to classify and label web resources. Metadata improves search relevancy, provides information about who created the information and when it was created, supports website maintenance and administration, helps create data-driven pages, and allows information to be tracked and assembled government-wide. Without quality metadata, the public cannot efficiently locate government information using search engines. Metadata should be applied on as many pages as possible so that both high-level pages and pages embedded deep within a website can be reasonably accessed.

The set of required metadata elements is based on internationally recognized Dublin Core standards, which are widely used by government and commercial websites, including all Government of Canada websites.

Implementation Guidance:

- Organizations should reference <u>Dublin Core Metadata standards</u>, which provide examples of appropriate metadata syntax for the required elements.
- If organizations choose to include additional metadata, they should choose from the Dublin Core standards.
- Organizations may choose to include subject and keyword metadata if they consider it
 helpful for improving search relevancy and for content classification within their
 organization. For subject and keywords to be most effective, organizations should use
 standard terminology (for example, thesauri, taxonomies, controlled vocabularies,
 gazetteers) and apply them consistently across the website.
- While organizations are required only to apply metadata to homepages and all major entry points, they are encouraged to include metadata on as many pages as is feasible, within resource constraints.
- Cross-agency portals should use the "creator" field to list the primary sponsoring agency or agencies who manage the website.
- The Web Content Standards Working Group (or the proposed Web Content Advisory Council) will coordinate with the ICGI's Electronic Records Policy Working Group and the Categorization of Information Working Group to continue identifying appropriate metadata for federal public websites, which will strengthen the federal government's ability to categorize government information and manage its web records.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2007.

h. Requirement: Organizations Must Inform Audiences of Website Changes. When

federal public websites undergo changes that may affect the public's ability to locate information on the website, the organization must help visitors locate information in the new format. When significant changes occur, such as a website redesign, the organization must provide information to the public about the changes. When changes are made to an organization's root domain name (for example, www.irs.gov or https://www.publicdebt.treas.gov), they must notify staff at FirstGov.gov [now USA.gov] so the new domain name is correctly identified on FirstGov, including the government-wide domain directory and search index.

Exceptions: This requirement does not apply to changes that do not affect the public's ability to locate information on the website, such as adding new features or sections to a website.

Rationale: Repeat visitors are familiar with a website's navigation and appearance and will get confused if a website doesn't explain changes that affect their ability to accomplish what they need. In particular, every visitor needs to know about changes to URLs that may affect bookmarks and other links to the website. Since many federal organizations link to each other, it's important to keep URLs current, or provide redirect pages, so content on other federal websites also stays current.

Implementation Guidance:

- Organizations should explore various ways of informing the public about changes to the
 website, both before and after changes have been made. The method for notifying the
 public should consider the magnitude of changes.
- Significant changes requiring notification may include:
 - Changes to an organization's root domain name, such as changing from www.bcis.gov to www.uscis.gov;
 - URL changes for frequently visited pages (such as those that occur when a page is removed, renamed, or placed in a different location within the website);
 - · Major changes to the navigational or organizational structure of the website;
 - Website redesigns (complete change to a website's "look and feel" and navigation scheme).
- For website redesigns, organizations should include a notice on the homepage
 informing visitors about the new design and how it will impact their ability to find
 information. Recent research and usability testing indicates that full-scale website
 redesigns are not always as effective in meeting the needs of customers as making
 incremental changes, and thus should be undertaken after careful consideration.
- Organizations should minimize URL changes as much as possible, especially for
 frequently visited pages, since many websites may link to those URLs and those URLs
 may be bookmarked by many individuals. When organizations change their secondlevel domain name, they should insert a "redirect" notice that will automatically take
 visitors to the new URL. Since organization domain names are widely known and part
 of an organization's identity and branding, organizations should communicate any
 changes to as wide an audience as possible. In addition, organizations must notify staff
 at FirstGov.gov [now USA.gov] (with as much advance notice as possible), so the new
 URL is correctly identified in FirstGov's government-wide domain directory [now
 USA.gov government-wide domain directory] and in the FirstGov search index [now
 USA.gov search index].
- For individual page URL changes, organizations should insert a "redirect" notice that will
 automatically take visitors to the new URL. When a significant number of page URLs
 change at one time (for example, as part of a redesign or conversion to an automated
 content management system), organizations should provide as many ways as possible
 for visitors to locate the new page locations.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: Effective immediately. Organizations should follow this requirement when the next major website change occurs.

i. Requirement: Organizations Must Ensure Continuity of Operations During Emergencies. Every organization must have procedures to address what it will do with its website during disasters or emergencies.

Rationale: The public depends on federal websites to get information and services and do

business on a daily basis. Organizations need to plan how the website will communicate vital information during an emergency and what services will be available to the public.

Exceptions: There are no exceptions to this policy.

Implementation Guidance:

- Organizations should develop plans that will address what they will do with their
 website during disasters or emergencies. At a minimum, the plans should cover
 situations where websites may need to be taken off-line; procedures for bringing
 websites back on-line and ensuring system availability; procedures for updating,
 approving, and maintaining content; and the types of critical information that the
 public is expected to need most.
- Website plans should be documented in, and be consistent with, the organization's Continuity of Operations plans.
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help web content managers implement this requirement.

Implementation Deadline: December 31, 2005

- 4. Policy: To promote seamless government, federal organizations must work to simplify and unify information across the government. The proliferation of information on the Internet, including information on federal public websites, can make it difficult for the public to sift through the maze of available resources, some of them overlapping and duplicative. Better coordination within and among federal organizations would limit the amount of duplication that currently exists and allow organizations to more effectively manage their resources. One of the best ways to accomplish this is by leveraging the resources of cross-agency portals, which promote the principle that information and services are created once and used many times.
- a. Guideline: Federal Public Websites Should Avoid Duplication. Organizations should avoid duplicating or recreating content that already exists on a federal public website. Before creating new information on a particular topic, organizations should, to the maximum extent possible, determine if that same-or comparable-information already exists on their website or on another federal public website, including on a government-wide portal.

Rationale: The public can become confused when they find overlapping or inconsistent information on the same subject. The accuracy and quality of content will be improved if it is created once, where the greatest expertise exists, maintained thoroughly, and used many times. Decreasing duplication will also help organizations focus resources on web content within their mission area without duplicating content created by other mission areas. Identifying whether content already exists is less time-consuming than re-creating it.

Implementation Guidance:

- Before creating new content, organizations should use inventories of their own websites' content (as required in Section 207(f)(2) of the E-Gov Act) to determine if comparable content already exists.
- To determine whether content already exists on another federal public website,
 organizations are encouraged to use FirstGov.gov, the official portal of the U.S.
 government [now USA.gov]. FirstGov [now USA.gov] maintains and regularly updates a
 list of cross-agency portals, including portals about a particular topic or audience
 group. FirstGov also organizes government-wide content by subject and provides a
 government-wide search.
- When existing content is the same or comparable within organizations or across organizations, those agencies should consult with each other to find ways to share or coordinate content and to mitigate duplication.
- There may be situations where it is valuable for the public to have information on a particular topic from different sources. In these situations, organizations need to ensure that the multiple pieces of information are complementary rather than conflicting.

Implementation Deadline: Immediate

b. Guideline: Organizations Should Collaborate in Developing Cross-Agency Portals. Organizations should collaborate with each other in developing cross-agency portals to ensure they provide the breadth of information and services available across

government about the particular topic or audience group. Cross-agency portals should be coordinated with OMB or the Web Content Advisory Council to ensure that they a) meet a defined business need; b) include all appropriate organizations; c) do not duplicate existing portals; and d) have sufficient resources to be sustainable. Sponsoring organizations should have a strategic plan to ensure cross-agency portals can be effectively managed over time.

Rationale: Cross-agency portals provide many benefits to the public and to the federal government by bringing together information and services from multiple federal organizations on a particular topic or audience group. These portal websites can improve the public's access to information and services, strengthen the quality of content, and provide cost and efficiency savings to federal organizations. But to achieve these benefits, organizations need to work together to develop cross-agency portals rather than developing them in isolation. If cross-agency portals are not managed effectively, the public may not be getting a full view of all available information and resources, even though they believe they are.

Implementation Guidance:

- Organizations should work in partnership to ensure that cross-agency portals provide value to citizens and that the content is managed effectively.
- Before developing and naming a new government-wide portal, organizations should coordinate with OMB or the Web Content Advisory Council, which will review and recommend appropriate action for proposed cross-agency portals. (See proposal in Section 7c).
- The Web Content Managers Toolkit website will provide more specific information, including examples and best practices, to help organizations effectively develop and manage cross-agency portals.

Implementation Deadline: Immediate

c. Guideline: Federal Public Websites Should Link to Appropriate Cross-Agency Portals. Federal public websites should link to appropriate cross-agency portals when applicable, to guide the public to additional resources that exist across the U.S. government.

Rationale: Links to cross-agency portals can supplement or replace the information on federal public websites. Links to other government information can guide visitors to additional resources to help them find what they need. This is especially important for federal public websites since many visitors do not know the organizational structure of the government and may need additional assistance to locate the information or service that best meets their needs. These links can also help ensure that visitors are being directed to the most authoritative, current source for the information, rather than having individual organizations attempt to keep the information accurate and up-to-date themselves.

Implementation Guidance:

- When a federal public website provides information on a particular topic or for a
 particular audience for which there is an appropriate, useful government-wide portal,
 the organization should link to the government-wide portal from its page(s) on that
 topic. A list of recognized cross-agency portals is provided on FirstGov.gov [now
 USA.gov].
- As with all links, organizations should regularly review links to cross-agency portals to ensure they are current and accurate.
- When providing organizational information to visitors (for example, a list of all cabinet-level agencies or independent agencies), organizations should link to the organizational directory pages on FirstGov.gov [now USA.gov], which provides a comprehensive listing of all federal organizations.
- To avoid confusion, organizations should not link to cross-agency portals unless those websites are related to the organization's mission or function.
- The Web Content Managers Toolkit website will provide more specific information, including a list of current cross-agency portals to which organizations should consider linking.

Implementation Deadline: Immediate

d. Requirement: Pages on Federal Public Websites Must Link to the Homepage. To improve usability, every page on federal public websites must include a link back to the

website's homepage or to another appropriate, logical starting point.

Exceptions: PDF files are exempt from this requirement. Other file types that cannot physically contain a link are also exempt.

Rationale: Visitors often need to access a website's front page to choose other paths and to have another way of knowing where they are within a website. This helps both those who get lost and others who drill deeply into a website from a search engine or other source.

Implementation Guidance:

- Many people do not recognize that an organization's logo links to the homepage. If an
 organization uses a graphical link to a homepage, it must also include text indicating
 that it links to the homepage.
- Organizations may choose to include a navigational link to the homepage of a higher level organization within its hierarchy. For example, the FBI may choose to link to its parent organization, the Department of Justice.

Implementation Deadline: December 31, 2007

e. Requirement: Federal Public Websites Must Link to FirstGov.gov [now USA.gov]. Every federal public website must link from its homepage and major entry points to the homepage of FirstGov.gov (www.firstgov.gov) [now USA.gov].

Exceptions: There are no exceptions to this requirement.

Rationale: Section 204 of the E-Government Act of 2002 designates FirstGov,gov as the official web portal of the U.S. Government [now USA.gov]. FirstGov.gov [now USA.gov] serves as the "homepage" for the entire U.S. government by providing a topical and organizational directory of U.S. government websites and a government-wide search index. It promotes seamless government by allowing citizens to access the vast amount of information from across government without having to know which agency sponsors the information. In the same way that links to a homepage help people start browsing from a known location, this link will help people who aren't at the website of the appropriate agency find the government information and services they need.

Implementation Guidance:

- Organizations must link to FirstGov.gov [now USA.gov]. Preferred methods are to use:
- A graphic link: an icon provided by FirstGov.gov [now USA.gov] with alt text.

 Instructions for adding the FirstGov [now USA.gov] icon can be found at the website.
- A text link: "U.S. Government Homepage" (if it fits, use "FirstGov: The U.S. Government Homepage") [now USA.gov]

Implementation Deadline: December 31, 2005

Related Recommendation: The working group recommends that the name for FirstGov.gov [now USA.gov] be changed to a name that is more intuitive, that better conveys the purpose of the website, and that is more marketable. Usability testing and focus groups conducted by FirstGov [now USA.gov] (as well as people who commented on these recommendations) indicate that the public is unfamiliar with the name and that it lacks real meaning. There have been numerous suggestions to change the name to usa.gov or us.gov, which are domains already registered by GSA. Changing the name would have minimal impact on FirstGov's [now USA.gov] visibility and its number of visitors, since a permanent, automatic redirect could be made to the new URL for anyone who still searches for FirstGov [now USA.gov].

- 5. Policy: Federal organizations must establish priorities and a schedule for posting content on their public websites.
- a. Requirement: Agencies Must Comply with Section 207(f)(2) of the E-Government Act of 2002. Agencies must develop an inventory of information to be published on their websites, establish a schedule for publishing information, make those schedules available for public comment, and post the schedules and priorities on the website. Agencies should develop their website inventories based on the wants and needs of citizens as a whole and intended audiences. In establishing priorities, agencies should consider current and anticipated information needs, as well as historical, legacy materials.

Exceptions: There are no exceptions to this requirement.

Rationale: Section 207(f)(2) of the E-Government Act of 2002 requires each agency ("agency" here is defined in the Act) to:

- Establish a process for determining which information will be made available on the Internet and by other means;
- · Develop priorities and schedules for making that information available;
- Make those priorities and schedules available for public comment;
- · Post the priorities and schedules on the website; and
- Report the priorities in their annual report to OMB on implementing the E-Government Act.

- The E-Government Act requires agencies to establish priorities by December 2004.
 These recommendations suggest how to implement this requirement. The ICGI or OMB may want to circulate this guidance immediately, to help agencies meet this requirement.
- Attachment D includes a set of worksheets that agencies may use to establish an
 inventory and set priorities. The Web Content Management toolkit will include these
 worksheets.
- The first step is to create an inventory of content that all intended audiences need or want. The inventory should identify categories of information, such as press releases, publications, and budget documents-not specific documents.
- In general, agencies should set priorities as follows:
 - Priority 1: required by law, regulation, Presidential directive, or other official directive or to ensure national security
 - Priority 2: mission-critical and essential for program operations, but not required by law, regulation, or Presidential directive (that is, information or services that are directly tied to an agency's mission and/or strategic plan)
 - Priority 3: frequently requested information or services that would improve business processes and/or customer service to the public (for example, most commonly used forms, documents, applications, transactions, etc.).
 - Priority 4: other information
 - If information fits in two or more priorities, agencies should assign it the highest priority.
- To determine the schedule for posting additional content, the agency should start with Priority 1 content and work down. Agencies also should consider:
 - The frequency of use by the intended audience(s); and
 - The level of effort and time required by the agency to convert the information for the Internet. There may be some "low hanging fruit" that might warrant a higher priority, such as content that is already available in another format that easily could be converted to the web. Conversely, there may be some older "legacy" documents or databases that might be assigned a lower priority if converting them to the web would pose an undue burden on the organization.
- The agency should incorporate this requirement in management plans and monitor performance.
- The agency should reinforce (or develop) policies to ensure that appropriate review and approval processes are in place for web content.
- The inventory, priorities, and schedule for posting additional content should be posted on the website for comment. Comments should be accepted by e-mail or a web-based comment form.
- When developing the inventory, agencies should use this guideline: If it can be public, and is of interest to the general public, it should be public. Agencies dealing with national defense and law enforcement should weigh security needs with the public's need to know.
- The agency's web content manager(s) must be included in the process of establishing the inventory, priorities, and schedule.
- The agency should post the full inventory, showing both content that already is available to the public and the publication schedule for additional content. The recommended location of this information, or a link to this information, is on the page containing web policies and important links.
- · Organizations should adopt a routine review process-monthly, quarterly, semi-annually,

- or annually-to identify obsolete content and remove it.
- Additional guidance, along with examples and best practices, will be included on the Web Content Management Toolkit website.

6. Policy: Organizations must continue to comply with existing federal laws, regulations and policies. In addition to the particular actions discussed above, this guidance reiterates existing federal laws and regulations, general directives from previous Presidential and OMB memoranda, and other policies regarding federal public websites. Organizations should continue to follow these requirements, as indicated.

Note: Given that this section reiterates existing requirements, we have not included exceptions, implementation guidance, or an implementation deadline under each item, as we have in other sections of this document. Organizations should refer to the individual citations for these details. The Web Content Managers Toolkit will also provide additional guidance, best practices, and examples to help web content managers as they continue to implement these requirements.

- a. Requirement: Federal Public Websites Must Comply with Privacy Requirements. All federal public websites must comply with existing laws and directives that address the need to protect the privacy of the American people when they interact with their government. Some of the key requirements for federal public websites include: (1) conducting privacy impact assessments; (2) posting privacy policies on each website; (3) posting a "Privacy Act Statement" that tells visitors the organization's legal authority for collecting personal data and how the data will be used; and (4) translating privacy policies into a standardized machine-readable format. Organizations should review the following laws and regulations related to privacy protections to ensure that their public websites meet the full range of requirements:
- OMB Memorandum 03-22, OMB Guidance for Implementing the <u>Privacy Provisions of</u> the E-Government Act of 2002
- E-Government Act of 2002, Section 207(f)(1)(B)
- Privacy Act of 1974
- OMB Circular A-130, App 1
- Children's Online Privacy Protection Act of 1998 (COPPA)
- b. Requirement: Federal Public Websites Must Have Security Protocols to Protect Information. All federal public websites must comply with Section 207(f)(1)(b)(iv) of the E-Gov Act of 2002, which requires organizations to have security protocols to protect information.
- E-Gov Act of 2002, Section 207(f)(1)(b)(iv), Security Protocols
- c. Requirement: Federal Public Websites Must Ensure Access for People with Disabilities. All federal public websites must continue to comply with the requirements of Section 508 of the Rehabilitation Act (29 U.S.C. 794d), designed to make online information and services fully available to individuals with disabilities. Organizations should review Section 508 and accompanying guidance to ensure that their public websites meet the requirements:
- Section 508 of the Rehabilitation Act
- Guidance for Implementing Section 508
- d. Requirement: Federal Public Websites Must Comply with the Freedom of Information Act (FOIA). All federal public websites must comply with existing laws and directives that relate to the Freedom of Information Act. The principal requirement is that websites must have a page that includes certain content as required by the Freedom of Information Act (FOIA). This page should include information about how the public can request information under the Act. Organizations should review the FOIA and implementation guidance to ensure that their public websites meet the full range of requirements:
- Freedom of Information Act
- Implementation guidance from the Department of Justice
- e. Requirement: Federal Public Websites Must Comply with Information Quality Guidelines. All federal public websites must comply with Public Law 106-554, "Guidelines for Ensuring and Maximizing the Quality Objectivity, Utility, and Integrity of Information

Disseminated by Federal Organizations." This law requires federal organizations to issue guidelines for "ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal organizations." Organizations should review the Act and implementation guidance to ensure that their public websites meet the requirements:

- Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001: Public Law 106-554, "<u>Guidelines for Ensuring and Maximizing the Quality</u> <u>Objectivity, Utility, and Integrity of Information Disseminated by Federal Organizations</u>" [PDF]
- f. Requirement: Federal Public Websites Must Provide Appropriate Access for People with Limited English Proficiency. Organizations must comply with existing requirements of Executive Order 13166, "Improving Access to Services for People with Limited English Proficiency," based on Title VI of the Civil Rights Act of 1964, which bans discrimination on the basis of national origin. Agencies must specifically follow guidance related to agency websites.
- See Executive Order 13166, "Improving Access to Services for People with Limited English Proficiency"
- <u>Department of Justice guidance for implementing the Executive Order</u>. This includes quidance on federal public websites.
- g. Requirement: Federal Public Websites Must Comply with the Paperwork Reduction Act (PRA). All federal public websites must comply with the Paperwork Reduction Act (44 U.S.C. Chapter 35) to ensure that information collected from the public minimizes burden and maximizes public utility. One of the principal requirements of the PRA is that organizations must have OMB approval before collecting information from the public (such as forms, general questionnaires, surveys, instructions, and other types of collections), and they must display the current OMB control number on the collection. Organizations should review the PRA and implementation guidance to ensure their public websites meet the full range of requirements:
- Paperwork Reduction Act
- Paperwork Reduction Act, Section 3507, "Public Information Collection Activities"
- Guidance from OMB: "Paperwork Requirements"
- h. Requirement: Federal Public Websites Must Comply with the Government Paperwork Elimination Act (GPEA). All federal public websites must comply with the Government Paperwork Elimination Act (GPEA, Pub. L. 105-277). The Act requires that, when practicable, federal organizations use electronic forms, electronic filling, and electronic signatures to conduct official business with the public, by 2003. Organizations should review the Act to ensure that their public websites meet the full range of requirements:
- Government Paperwork Elimination Act (GPEA)
- i. Requirement: Federal Public Websites Must Comply with Records Management Requirements. All federal public websites must comply with existing laws and regulations related to the management of public web records. This includes the need for organizations to comply with necessary policies and standards to implement the E-Government Act of 2002, Section 207(e), "Public Access to Electronic Information," which will be issued by December 2005. Organizations should review existing laws and regulations to ensure their public websites meet the full range of requirements:
- Code of Federal Regulations (CFR), Parts 1220-1238
- E-Gov Act of 2002, Section 207(e), "Public Access to Electronic Information"

In addition, NARA will be issuing policy and requirements for the capture and transfer of a government-wide snapshot of federal public websites at the end of an Administration.

j. Requirement: Federal Public Websites Must Comply with Digital Rights, Copyright, Trademark, and Patent Laws. Most content on federal public websites is in the public domain and should not include copyright or other intellectual property notices. However, when an organization uses or duplicates information available from the private sector as part of an information resource, product or service, the organization must ensure that the property rights of the private sector source are adequately protected. These protections apply to any material posted to federal public websites, such as documents, graphics, or audio files. Organizations should also review content to determine if it is

subject to international copyright laws. Organizations should review the relevant laws and regulations to ensure that their public websites meet the full range of requirements:

- <u>Digital Millennium Copyright Act</u> [PDF]
- Copyright Law
- <u>U.S. Trademark Law</u> [PDF]
- U.S. Patent Law, U.S. Code 35, Chapter 26
- k. Requirement: Federal Public Websites Must Comply with the Government Performance and Results Act (GPRA). All federal public websites must comply with Government Performance and Results Act of 1993, which requires organizations to make their annual performance plans readily available to the public.
- Government Performance Results Act of 1993
- I. Requirement: Federal Public Websites Must Comply with the No Fear Act. All federal public websites must comply with the existing No Fear Act Notification and Federal Employee Anti-discrimination and Retaliation of 2002 (No Fear Act) Public Law No. 107-174). Organizations should review the relevant law to ensure that their public websites meet the full range of requirements:
- No Fear Act Notification and Federal Employee Anti-discrimination and Retaliation of 2002 (No Fear Act) Public Law No. 107-174)
- m. Requirement: Federal Public Websites Must Comply with the Small Business Paperwork Relief Act. All federal public websites must comply with Small Business Paperwork Relief Act of 2002, which requires organizations to designate a single point of contact for small businesses, and to post the contact information on the organization's website.
- Small Business Paperwork Relief Act of 2002
- n. Requirement: Federal Public Websites Must Comply with Restrictions on Lobbying. All federal public websites must comply with existing laws that prohibit federal public websites from being used for direct or indirect lobbying. Organizations should review the relevant law to ensure that their public websites meet the full range of requirements:
- "Prohibition of Lobbying," Title 18, Section 1913 of the U.S. Code
- o. Requirement: Federal Public Websites Must Comply with Upcoming Requirements to Categorize Information. All federal public websites must comply with upcoming policies and standards to implement the E-Government Act of 2002, Section 207(d), which are being developed based on recommendations from the ICGI's Categorization of Information Working Group.
- 7. Policy: Developing web content policies and requirements for federal public websites is an ongoing process, requiring structure. The federal government must continue to review and improve web content policies and practices and look ahead to new policies and practices that can make federal public websites, both individually and as a group, the most citizen-focused and visitor-friendly in the world. When common web content practices will both improve the visitors' experience and make better use of resources across the federal government, they should be implemented. We need a structure to ensure this happens.
- a. Recommendation: OMB Should Establish a Web Content Advisory Council. OMB should establish a permanent Web Content Advisory Council to regularly review and make recommendations for strengthening web content policies and for coordinating support for implementing the policies across federal agencies. The Council should continue, and expand on, the work started by the Web Content Standards Working Group. The Council should serve as an advisory group to OMB agencies and base its recommendations on regular input from federal web content managers, others who work on federal websites, program managers, other stakeholders, web content experts, industry advisors, and citizens. OMB should ensure that the Council has adequate funding and support. The Council should report annually to OMB on its accomplishments and plans.

The Council's Duties: The Council should have two primary responsibilities:

- 1. Support OMB by making recommendations about web content policies and practices
- Review existing policies, requirements, and guidelines and propose changes and additions, as necessary.

- Review requests for common content on federal public websites, such as proposed links and icons. Recommend to OMB the best way to implement the common content, based on usability testing, audience analysis, and other best practices.
- Recommend OMB action on current and proposed cross-agency portals.
- Offer other recommendations related to web content practices, requested by OMB.
- 2. Support federal web content managers by coordinating best practices, research, and other practical tools that can be shared and leveraged across all federal agencies.
- Manage and maintain the Web Content Management Toolkit website which will include a
 complete listing of all requirements and guidelines for federal public websites,
 implementation guidance, resources and references for implementation, examples and
 best practices, and other important information for federal web content managers.
- Plan and host an annual Web Content Managers Workshop to discuss lessons learned and best practices in implementing requirements and guidelines for federal public websites, ideas, trends, and possibilities for collaboration.
- Research and establish a directory of web content manager resources, including training opportunities for web content managers.
- · Manage the web content managers' contact database and listserv.
- Coordinate regular meetings of web content managers, incorporating both presentations on current issues and "roundtable" discussions intended to share lessons learned and best practices.
- Research, evaluate, and propose partnerships to provide agencies common services such as web analytical support, usability testing, customer analysis, and translation resources.

Composition:

- OMB and the Director of FirstGov.gov [now USA.gov], as the web content manager of the official federal Internet portal (designated under Section 204 of the E-Gov Act of 2002), should sponsor the Web Content Advisory Council.
- The Council should be composed of at least 30 members, including a representative from OMB. The members should be primarily web content managers-federal employees who actually write, edit, manage, and form strategic plans for the content of federal websites-from the highest level in their departments and agencies.
- The Council should include at least one web content manager from each Cabinet-level department or agency and one web content manager from at least five independent agencies or subordinate organizations. The independent agencies or subordinate organizations represented should be rotated every two years, to include a variety of perspectives.
- OMB should nominate Council members, in consultation with the Director of FirstGov.gov [now USA.gov], and subject to approval by the department or agency heads.
- OMB should review membership at least annually, and changes should be made on the recommendation of agency heads, the Director of FirstGov.gov [now USA.gov], or both.
- OMB or the Director of FirstGov [now USA.gov] may designate a project manager, a steering committee, or other organizational support to assist in coordinating the duties of the Council.
- OMB or the Director of FirstGov [now USA.gov] may invite other federal web content
 managers or others with specialized knowledge and experience to be involved in
 specific tasks of the Council.

Rationale: Accomplishing the goal of making the United States government's public websites the most citizen-focused and visitor-friendly in the world cannot be accomplished by a one-time initiative. It needs to be an ongoing process and coordinated approach. Technology improvements, growing expectations of citizens, usability research, new trends, and best practices may inspire changes in existing policies and requirements or new policies and requirements. Federal web content managers need a source of guidance and resources to help them implement policies and requirements and to learn about new directions. Requirements and decisions based on recommendations of an Advisory Council of their peers will be more credible to federal web content managers.

Implementation:

- Since the ICGI Web Content Standards Working Group already is formed and
 functioning in the way the Council would function, the Working Group should be
 designated the initial "Web Content Advisory Council" when the OMB guidance is
 issued. This will keep momentum going and make use of the knowledge that Working
 Group members have gained in this process. Agency heads should have an opportunity
 to approve their designee or nominate an alternate.
- · Additional members should be nominated to complete the Council.
- OMB should ensure that the Council has sufficient funding to operate and conduct the recommended duties.

Implementation Deadline: Immediate

b. Recommendation: Common Content and Links Should Be Approved by OMB. Federal agencies that want to require common content or links on federal public websites other than their own should submit that request to OMB before incorporating it in rules or regulations. OMB should ask the Web Content Advisory Council for recommendations on these requests.

Exceptions: There are no exceptions to this requirement.

Rationale: In the last few years, both Congress and certain federal agencies have established requirements for web content, including specifying the names and locations of links that must be included on every federal public website. While the intentions may be good, the result is not always the best for the public. In fact, so many links have been required or suggested that many federal website homepages have become cluttered and confusing to citizens. A link location might work well on one website and not on another because the organization and audiences of each homepage is different. Usability testing is the best way to determine names and locations of links.

Implementation Guidance:

- · OMB should require federal agencies to submit requests for common content and links.
- OMB should ask the Web Content Advisory Council to review the requests for common content and links and recommend to OMB the best way to implement them, based on usability testing, audience analysis, and other best practices.
- OMB should issue guidance, based on the recommendations of the Web Content Advisory Council.

Implementation Deadline: Immediate

c. Recommendation: OMB Should Review and Approve Cross-Agency Portals. OMB should establish a process to review and approve current and proposed cross-agency portals to ensure they are needed, include all appropriate agencies, do not duplicate other websites, and have sufficient support to be sustained.

Exception: There are no exceptions to this requirement

Rationale: In the past few years, there has been a proliferation of cross-agency portals. The FirstGov.gov website [now USA.gov] currently lists 83 existing cross-agency portals. Others are in development. Currently, any group that can get a domain name can establish a portal, even if that portal duplicates other portals, fails to fill a legitimate business need, or lacks support of appropriate agencies. The public may not be getting a full view of all available information and resources, even though they believe they are. Some portals start out well but fail over time, due to lack of maintenance. Further, agency web teams are being stretched to provide support to all the portals that are emerging.

While cross-agency portals are an excellent way to blend common content and make it easier for the public to find what they need, portals must be comprehensive, high quality, sustainable, and meet a legitimate business need.

- OMB and GSA should establish stronger policies for issuing domain names for crossagency portals.
- OMB should ask the Web Content Advisory Board to review and recommend appropriate action for new cross-agency portals. Recommendations should be based on:
 - · Review of plans to meet a legitimate business need,
 - · Analysis of existing portals to determine if there is duplication,
 - · Evidence that the new portal has sufficient commitment of resources to ensure it

can be sustained, and

- Review of the agencies involved, to ensure that all agencies having related missions and functions are included.
- OMB should review existing cross-agency portals and take appropriate action on those
 that fail to meet a legitimate business need, duplicate others, fail to include all
 appropriate agencies, appear to be out-of-date or lack maintenance, or any
 combination of these factors.
- The Director of FirstGov.gov should ensure that all approved cross-agency portals are listed on FirstGov.gov.

Implementation Deadline: Immediate

d. Recommendation: Agencies Should Report Progress and Compliance with Web Content Policies and Requirements. Agencies must report on compliance with requirements from the E-Government Act of 2002, Section 202(g). Those reports should include progress and compliance with web content policies and requirements, including results from the agency's standard customer satisfaction survey (see Recommendation 2e).

Exceptions: Only OMB may grant exceptions

Rationale: Since these policies, requirements, and guidelines emanate from the E-Government Act, they should be incorporated in the annual reporting required by the Act.

Implementation Guidance: Web content managers must participate in determining compliance with these requirements, for the annual report. Since many web content managers work in organizations other than the CIO, agency heads and CIOs must ensure that the web content managers are aware of the internal report deadlines and any guidance that has been provided by OMB.

Implementation Deadline: Annual reporting date required by OMB

Read the Summary and Background of ICGI Report.

Read the ICGI Report Attachments:

A. ICGI Web Content Standards Working Group and Advisors

B. Definitions

C. Vetting List

D. Establishing a Federal Public Website Inventory, Priorities, and Publication

Schedule (and Worksheets)

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