


[WEB CONTENT](#)
[SOCIAL MEDIA](#)
[MOBILE](#)
[CHALLENGES & CONTESTS](#)
[CONTACT CENTERS](#)
[CUSTOMER EXPERIENCE](#)
[Communities](#)
[DigitalGov Blog](#)
[Services & Tools](#)

[Home](#) » [About Us](#) » [Federal Web Managers Council – Documents and Papers](#) » ICGI Recommendations for Federal Public Websites - 2004

ICGI Recommendations for Federal Public Websites - 2004

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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

[Report Contents](#)

[Summary](#)

[Background](#)

[Recommendations](#)

[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 \(and Worksheets\)](#)

Summary

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

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[+](#) [Share](#) [Print](#) [✉](#) [Email Updates](#)

[↓](#) [Download Plug-ins](#)

In This Report

- [Summary](#)
- [Background](#)
- [Recommendations](#)
- [Attachments](#)
- [Comments](#)

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 [now USA.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 [now USA.gov].

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 [no longer available].

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 [now USA.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.

Read the [Recommendations of ICGI Report](#).

Read the [ICGI Report Attachments](#):

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[B. Definitions](#)

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[D. Establishing a Federal Public Website Inventory, Priorities, and Publication Schedule \(and Worksheets\)](#)

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[WEB CONTENT](#) | [SOCIAL MEDIA](#) | [MOBILE](#) | [CHALLENGES & CONTESTS](#) | [CONTACT CENTERS](#) | [CUSTOMER EXPERIENCE](#)

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