



DIGITAL EXPERIENCE

Agency Compliance with Statutory Requirements

Report to the Ranking Member Subcommittee on Cybersecurity,
Information Technology, and Government Innovation
Committee on Oversight and Accountability
House of Representatives

September 2024
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Accessible Version

GAO Highlights

View [GAO-24-106764](#). For more information, contact Carol C. Harris at (202) 512-4456 or harriscc@gao.gov. Highlights of [GAO-24-106764](#), a report to the Ranking Member, Subcommittee on Cybersecurity, Information Technology, and Government Innovation, Committee on Oversight and Accountability, House of Representatives

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Why GAO Did This Study

21st Century IDEA was intended to improve public-facing federal digital services. The act required agencies to submit five annual reports between December 2019 and December 2023 that discussed their implementation of website and digital service modernization requirements.

GAO was asked to review agencies' progress toward meeting the requirements in 21st Century IDEA. GAO's objectives were to (1) determine the reported status of agencies' efforts to comply with key website and digital service modernization provisions in the act and (2) describe the actions taken to comply with the act by selected federal entities that provide or fund high-impact customer-facing services.

To do so, GAO assessed the 24 CFO Act agencies' annual 21st Century IDEA reports, with a particular focus on the reports due in 2022 and 2023. GAO also chose four entities providing high-impact services to the public and examined the ways they were working to meet the act's requirements. GAO also interviewed knowledgeable agency officials and OMB staff.

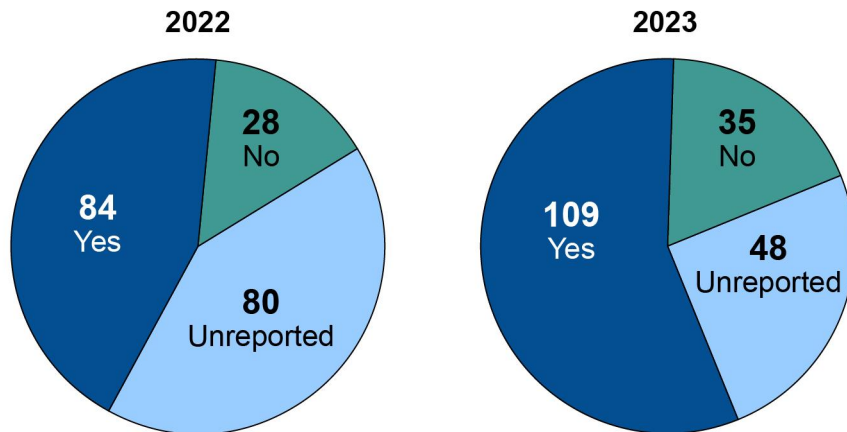
The Department of Defense concurred with the report. OMB and six of the 24 agencies provided clarifying comments which GAO incorporated as appropriate; these agencies did not indicate agreement or disagreement with the results of the report. Of the remaining 17 agencies, 16 stated they had no comments, and one did not respond.

What GAO Found

The *21st Century Integrated Digital Experience Act* (21st Century IDEA) required federal websites and digital services to be accessible, consistent, not duplicative, searchable, encrypted (secured connections), user data-driven (designed around user needs), customizable, and mobile-friendly. Reports submitted in 2022 and 2023 by the 24 *Chief Financial Officers Act of 1990* (CFO Act) agencies did not consistently address the implementation of these eight modernization requirements. Of the 192 requirements that the 24 agencies were to report on each year, the agencies addressed 84 in 2022 and 109 in 2023. The remaining requirements were either not addressed in the reports (i.e., progress was not explicitly mentioned) or unreported due to missing reports.

Number of Addressed Annual 21st Century Integrated Digital Experience Act Report Requirements in the 24 Chief Financial Officers Act of 1990 Agencies' 2022 and 2023 Reports

Number of Annual Report Requirements Addressed



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Number of Addressed Annual 21st Century Integrated Digital Experience Act Report Requirements in the 24 Chief Financial Officers Act of 1990 Agencies' 2022 and 2023 Reports

2022

Yes	No	Unreported
84	28	80

2023

Yes	No	Unreported
109	35	48

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Of the 18 agencies that submitted 2023 annual reports, seven addressed all eight requirements. The remaining 11 did not address all eight, including one agency that did not address any, one agency that addressed three, and two agencies that addressed four requirements. Six agencies did not submit 2023 reports; consequently, their progress was unknown.

Overall, the 24 CFO Act agencies submitted 84 (or 70 percent) of the 120 total required annual reports due between December 2019 and December 2023, when the reporting requirement sunsetted. Further, the reports had varying levels of content and detail. The lack of reporting guidance contributed to the inconsistent reporting, as agencies were allowed to interpret compliance differently throughout the reporting period.

The Office of Management and Budget (OMB) issued guidance in September 2023 that clarified compliance with the modernization requirements by describing a number of actions that agencies should perform. Continued oversight consistent with this guidance would likely provide an assessment of the extent of progress towards delivering better digital services to the public.

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Abbreviations

21st Century IDEA	21st Century Integrated Digital Experience Act
AFPIMS	American Forces Public Information Management System
CDN	Content Delivery Network
CFO Act	Chief Financial Officers Act of 1990
CX	customer experience
DAP	Digital Analytics Program
DOD	Department of Defense
DHS	Department of Homeland Security
EPA	Environmental Protection Agency
FedRAMP	Federal Risk and Authorization Management Program
FEMA	Federal Emergency Management Agency
FWS	Fish and Wildlife Service
GSA	General Services Administration
HHS	Department of Health and Human Services
HISP	High Impact Service Provider
HSTS	Hypertext Transfer Protocol Strict Transport Security
HTTP	Hypertext Transfer Protocol
HTTPS	Hypertext Transfer Protocol Secure
HUD	Department of Housing and Urban Development
NASA	National Aeronautics and Space Administration
NRC	Nuclear Regulatory Commission
NSF	National Science Foundation
OMB	Office of Management and Budget
TSA	Transportation Security Administration
TTB	Alcohol and Tobacco Tax and Trade Bureau
TTS	Technology Transformation Services
URL	Uniform Resource Locator
USAID	United States Agency for International Development
USWDS	United States Web Design System

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441 G St. N.W.
Washington, DC 20548

September 27, 2024

The Honorable Gerald E. Connolly
Ranking Member
Subcommittee on Cybersecurity, Information Technology, and Government Innovation
Committee on Oversight and Accountability
House of Representatives

Dear Mr. Connolly:

The manner in which federal agencies provide services to the public has shifted over time toward digital service delivery. However, according to the Biden administration’s President’s Management Agenda, service delivery from agencies has not kept pace with the needs and expectations of those it serves.¹

Federal legislation and guidance have focused attention on agencies’ efforts to enhance and improve customer experience, particularly in digital spaces. Chief among these efforts was the December 2018 passage of the *21st Century Integrated Digital Experience Act* (21st Century IDEA). This act was intended to improve federal digital services available for use by the public and reinforce existing requirements for government websites and related services to enhance customer experience.²

You asked us to review the reported progress that agencies have made against the requirements in 21st Century IDEA. Specifically, our objectives were to (1) determine the reported status of agencies’ efforts to comply with key website and digital service modernization provisions in the act and (2) describe the actions taken to comply with the act by selected federal entities that provide or fund high-impact customer-facing services.

To address the first objective, we first determined that all executive agencies with public-facing websites were required to follow the requirements of 21st Century IDEA. We chose to focus our review on the 24 agencies named in the *Chief Financial Officers Act of 1990* (CFO Act) because they are generally the largest agencies and they provide essential high-impact services to the public.³ We then conducted an in-depth analysis of agencies’ annual reports that were required to be submitted to the Office of Management and Budget (OMB) and be made publicly available in December 2022 and December 2023.⁴ We reviewed these reports to ascertain the extent to which they addressed the eight website and digital service modernization requirements in 21st Century IDEA. We determined that a requirement was addressed if an agency’s annual report

¹Office of Management and Budget, *The Biden-Harris Management Agenda Vision* (Washington, D.C.: November 2021).

²Pub. L. No. 115-336, 132 Stat. 5025 (2018) (44 U.S.C. § 3501 note).

³The 24 CFO Act agencies are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, Justice, Labor, State, the Interior, the Treasury, Transportation, and Veterans Affairs; the Environmental Protection Agency; the General Services Administration; the National Aeronautics and Space Administration; the National Science Foundation; the Nuclear Regulatory Commission; the Office of Personnel Management; the Small Business Administration; the Social Security Administration; and the U.S. Agency for International Development. Pub. L. No. 101-576, 104 Stat. 2838 (Nov. 15, 1990), as amended (codified at 31 U.S.C. § 901(b)).

⁴The annual reporting requirement is listed in Section 3(d) of 21st Century IDEA. See Pub. L. No. 115-336, §3(d).

mentioned progress. We also examined the scope and format of the reports to determine how progress was reported.

In addition, we collected all five annual reports required to be submitted between December 2019 and December 2023 to identify the extent of missing reports. For any missing reports, we obtained the rationales for why they were not submitted.

We supplemented our report analyses by interviewing knowledgeable agency officials who were involved in managing or modernizing agency digital services, as well as those who compiled and issued the annual 21st Century IDEA reports. We also interviewed OMB staff who were knowledgeable about agencies' 21st Century IDEA requirements and the related federal guidance.

To address the second objective, we first reviewed the 2023 list of High Impact Service Providers (HISPs), which are entities that OMB identified as providing or funding customer-facing services that have a high impact on the public. We used the list to select a group of four HISPs to review. Specifically, we chose HISPs that had a significant impact on a large number and variety of individual citizens. We excluded HISPs that were, among other things, relatively new (i.e., named as a HISP in 2022 or 2023) or being evaluated in our other ongoing work. Our methodology resulted in a list of four selected HISPs: the Department of State's Bureau of Consular Affairs, the Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA), the Department of Interior's Fish and Wildlife Service (FWS), and DHS's Transportation Security Administration (TSA). As our selected HISPs all have public-facing websites, they are subject to the same website and digital service modernization requirements as their parent departments and other executive agencies.

We reviewed each of our selected HISPs and described the ways in which they are working to meet 21st Century IDEA requirements and improve their websites and digital services. Specifically, we obtained information from agency officials about the tools, standards, and methodologies that have been used for their modernization projects. We also asked about any new or existing boards, offices, or staff positions assisting with the implementation of these modernization initiatives. We supplemented our analyses with a review of documentation from agencies, including policies and guidance referenced by the HISPs, documentation on the use of the tools, and charters for any designated oversight groups. See appendix I for more information on our objectives, scope, and methodology.

We conducted this performance audit from April 2023 to September 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

According to Executive Order 14058, customer experience is the public's perceptions of and overall satisfaction with interactions with an agency, product, or service.⁵ Recent OMB guidance defines digital experience as the interactions between an individual and an organization that are enabled by digital

⁵Exec. Order No. 14058, *Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government* (Dec. 13, 2021).

technologies. It further clarifies that digital experience is dependent on both the technology required to deliver services over digital channels as well as the IT that supports or enables the delivery of services over traditional channels.⁶ In other words, the digital experience of an individual applying for government assistance includes the technology that would support the submission and evaluation of an application submitted over the internet, as well as the technology that would support the submission and evaluation of a paper application sent through the mail.

OMB guidance also states that digital experience plays a significant role in customer experience. For example, a seamless digital experience is often expected and necessary for overall customer trust, confidence, and satisfaction. Customer experience cannot be successfully achieved without considerations of digital experience since much of modern service delivery is through digital channels or is supported by technology. Agency success in digital experience involves, among other things, investing in digital transformation and necessary IT modernization efforts.⁷

21st Century IDEA Was Enacted to Improve Customers' Digital Experience

The *21st Century Integrated Digital Experience Act* (21st Century IDEA), enacted in December 2018, was directed toward executive agencies with public-facing websites and digital services. The act was intended to improve federal digital services available for use by the public. It also reinforced existing requirements for government websites and related services to enhance customer experience. To that end, 21st Century IDEA includes a list of eight modernization requirements for both new and redesigned public-facing websites and digital services created by federal agencies.⁸ Specifically, websites and services must, to the greatest extent practicable, be:

1. **Accessible:** accessible to individuals with disabilities in accordance with section 508 of the Rehabilitation Act of 1973;⁹
2. **Consistent:** have a consistent appearance;
3. **Not duplicative:** not overlap with or duplicate any legacy websites and, if applicable, ensure that legacy websites are regularly reviewed, eliminated, and consolidated;
4. **Searchable:** contain a search function that allows users to easily search content intended for public use;
5. **Encrypted:** provided through an industry standard secure connection;
6. **User data-driven:** designed around user needs with data-driven analysis influencing management and development decisions, using qualitative and quantitative data to determine user goals, needs, and behaviors, and continually test the website, web-based form, web-based application, or digital service to ensure that user needs are addressed;

⁶Office of Management and Budget, *Delivering a Digital-First Public Experience*, M-23-22 (Washington, D.C.: Sept. 22, 2023).

⁷Office of Management and Budget, *Delivering a Digital-First Public Experience*, M-23-22 (Washington, D.C.: Sept. 22, 2023).

⁸21st Century IDEA also requires that agencies modernize their internal websites and digital services (such as intranet sites) to meet the eight modernization requirements to the extent practicable.

⁹Pub. L. No. 93-112, 87 Stat. 355, §508 (Sept 26, 1973) (codified at 29 U.S.C. 794d).

7. **Customizable:** provide users of the new or redesigned website, web-based form, web-based application, or digital service with the option for a more customized digital experience that allows users to complete digital transactions in an efficient and accurate manner; and
8. **Mobile-friendly:** fully functional and usable on common mobile devices.¹⁰

In addition to the eight requirements listed above, 21st Century IDEA also required agencies to be in compliance with U.S. website standards issued by the General Services Administration's (GSA) Technology Transformation Services (TTS).¹¹ The mission of TTS is to design and deliver a digital government with and for the American public. According to GSA, TTS works with agencies to make their services more accessible, efficient, and effective with modern applications, platforms, processes, personnel, and software solutions.

Further, 21st Century IDEA stated that, to the extent practicable, agencies should coordinate with other agencies in their implementation of the act's requirements.¹² The act also stated that agencies should seek to maintain as much standardization and commonality with other agencies as practicable in implementing the requirements of 21st Century IDEA.

21st Century IDEA's Reporting Requirements Provided an Opportunity to Track Progress

21st Century IDEA required agencies to submit a total of five annual reports to OMB and the public, as well as one report to Congress. For the five annual reports, agencies were required to report on their progress towards implementing select requirements in 21st Century IDEA, including the eight modernization requirements listed above.¹³ The legislation itself did not specify that the agencies needed to address all eight requirements in each report, nor did it specify a report format or the level of detail required.

The first of the annual reports was due 1 year after the implementation of 21st Century IDEA in December 2019, and the last (fifth) report was due in December 2023. By requiring public reports every year for 5 years, the act provided a way for agencies to track their efforts to comply with 21st Century IDEA and improve their users' digital experience.

¹⁰We determined the short summary titles of the legal requirements by referring to the law as well as GSA's summary of the requirements as presented on Digital.gov prior to the issuance of OMB memorandum M-23-22 in September 2023. The text following the short summary titles is largely taken from the legal text from 21st Century IDEA.

¹¹Pub. L. No. 115-336, §3(e).

¹²Pub. L. No. 115-336, §6(6).

¹³Section 3(d) of 21st Century IDEA states: "PUBLIC REPORTING.—Not later than 1 year after the date of enactment of this Act and every year thereafter for 4 years, the head of each executive agency shall— (1) report annually to the Director on the progress of the executive agency in implementing the requirements described in this section for the previous year; and (2) include the information described in paragraph (1) in a publicly available report that is required under another provision of law."

In addition, 21st Century IDEA required agencies to submit one report to Congress due in December 2019.¹⁴ In the report to Congress, agencies were to list their most visited or used websites and digital services. From that list, the agencies were to prioritize a list of the websites and digital services needing modernization to meet the eight requirements and provide cost and schedule information on those modernization efforts.

OMB and GSA Provided Guidance Related to Website Modernization and Reporting

Prior to the enactment of 21st Century IDEA, OMB released guidance related to the website and digital service modernization requirements. For instance, OMB's November 2016 guidance, M-17-06: *Policies for Federal Agency Public Websites and Digital Services*, discussed most areas later addressed by 21st Century IDEA.¹⁵ Specifically, M-17-06 offered guidance related to the Accessible, Consistent, Searchable, Encrypted, User data-driven, Customizable, and Mobile-friendly requirements. M-17-06 did not address the Not duplicative requirement. Although related to the requirements, this guidance was not directly in reference to the act, nor did it address the reporting requirements.

Following the enactment of 21st Century IDEA, GSA sent an email on behalf of the Federal Chief Information Officer providing guidance on the report to Congress.¹⁶ In addition to outlining the reporting requirement, the email contained a template and a worksheet to help agencies complete their report to Congress.

The email sent on behalf of the Federal Chief Information Officer also contained information on the first annual reporting requirement, which was also due in December 2019. As with the report to Congress, the email outlined the reporting requirement. However, it did not contain any templates for the annual reporting requirement. According to OMB, it did not require the use of a standard template for the annual reporting requirement and sought to maximize flexibility in agencies' reporting.

An official within GSA's Office of Customer Experience informed us that GSA produced an optional template for the annual reports and shared it with the federal web manager community. This optional template called for brief, high-level descriptions of major accomplishments and their impacts, with the overall narrative not exceeding five pages.¹⁷ GSA distributed this optional guidance in September 2020, 3 months prior to the due date for the second annual report. Regarding this template, OMB reported that it encouraged agencies to use it if they found it helpful.

¹⁴Section 3(b) of 21st Century IDEA states: "REQUIREMENTS FOR EXISTING EXECUTIVE AGENCY WEBSITES AND DIGITAL SERVICES.—Not later than 1 year after the date of enactment of this Act, the head of each executive agency that maintains a website or digital service that is made available to the public shall—(1) review each website or digital service; and (2) submit to Congress a report that includes—(A) a list of the websites and digital services maintained by the executive agency that are most viewed or utilized by the public or are otherwise important for public engagement; (B) from among the websites and digital services listed under subparagraph (A), a prioritization of websites and digital services that require modernization to meet the requirements under subsection (a); and (C) an estimation of the cost and schedule of modernizing the websites and digital services prioritized under subparagraph (B)."

¹⁵Office of Management and Budget, *Policies for Federal Agency Public Websites and Digital Services*, M-17-06 (Washington, D.C.: Nov. 8, 2016).

¹⁶The Federal Chief Information Officer heads OMB's Office of the Federal Chief Information Officer. According to OMB, the Office of the Federal Chief Information Officer develops and provides direction to agencies in the use of internet-based technologies.

¹⁷Other sections suggested by the template include a cover page, background information, brief descriptions of implementation challenges, and a conclusion.

OMB published guidance specifically related to the eight requirements in September 2023.¹⁸ This guidance—M-23-22: *Delivering a Digital-First Public Experience*—rescinded M-17-06 and superseded a previous strategy related to digital governance issued in 2012.¹⁹ In effect, M-23-22 established new guidelines and a renewed focus on improving digital experience in the federal space. It applied to executive agencies and public-facing websites and digital services. In general, M-23-22 summarized relevant statutory requirements, clarified policy requirements for all federal public-facing websites, and expanded best practices for agency websites and digital services.²⁰

Selected HISPs Provide Key Customer-Facing Digital Services

HISPs are federal entities that are designated by OMB as providing or funding customer-facing services that have a high impact on the public, whether because of a large customer base or a critical effect on those served. As with any public-facing websites managed by an executive agency, the websites managed by HISPs should also be in compliance with the website and digital service modernization requirements in 21st Century IDEA.²¹

The four HISPs we selected for review rely on websites and digital services to provide help and assistance to the public.

- **The Department of State’s Bureau of Consular Affairs.** Consular Affairs’ priority is to protect the lives and serve the interests of U.S. citizens abroad. Consular Affairs assists citizens during important moments such as births, adoptions, medical emergencies, deaths, arrests, and disasters. Consular Affairs issues millions of U.S. passports each year. It also issues visas to qualified foreign nationals.
- **Department of Homeland Security’s (DHS) Federal Emergency Management Agency (FEMA).** FEMA is responsible for leading the nation’s efforts to prepare for, protect and mitigate against, respond to, and recover from the impacts of natural disasters, man-made incidents, and terrorist events. In 2023, FEMA coordinated responses across the U.S. and U.S. territories, supporting over 25 million people.
- **Department of the Interior’s Fish and Wildlife Service (FWS).** FWS is dedicated to the conservation of fish, wildlife, plants, and their habitats. The agency’s primary responsibility is the conservation and management of these natural resources for the American public. In addition to managing more than 600 wildlife refuges and fish hatcheries, FWS also provides law enforcement of wildlife and plant resources, oversees wildlife inspectors at major U.S. ports of entry ensure wildlife trade is legal and sustainable, and prohibits illegal wildlife and wildlife products.
- **DHS’s Transportation Security Administration (TSA).** TSA is responsible for the protection of the nation’s transportation systems to ensure freedom of movement for people and commerce. TSA is

¹⁸Office of Management and Budget, *Delivering a Digital-First Public Experience*, M-23-22 (Washington, D.C.: Sept. 22, 2023).

¹⁹The rescinded memorandum is: Office of Management and Budget, *Policies for Federal Agency Public Websites and Digital Services*, M-17-06 (Washington, D.C.: Nov. 8, 2016), and the superseded strategy is: Office of Management and Budget, *Digital Government: Building a 21st Century Platform to Better Serve the American People* (Washington, D.C.: May 23, 2012).

²⁰OMB provided other guidance related to 21st Century IDEA, notably Section 280 of OMB Circular A-11: “Managing Customer Experience and Improving Service Delivery.” The current version of Section A-11, which was issued in July 2024, incorporates M-23-22 and, among other things, provides guidance on how to collect and act upon customer feedback. Office of Management and Budget, *OMB Circular A-11 Preparation, Submission, and Execution of the Budget* (Washington, D.C.: July 2024).

²¹Pub. L. No. 115-336, §3(a).

responsible for nearly 440 federalized airports and for screening more than 2 million passengers daily. TSA also secures U.S. transportation networks including roadways, railroad tracks, tunnels, ports, and pipelines.

Agencies Did Not Fully Report on Compliance with Modernization Requirements

The 24 CFO Act agencies did not fully and consistently report on the eight website and digital service modernization requirements in 21st Century IDEA. Specifically, the 24 CFO Act agencies addressed between zero and all eight requirements in their submitted reports from 2022 and 2023. In addition, agencies submitted 84 (or 70 percent) of the 120 total required annual 21st Century IDEA reports.²² Further, the contents of the reports, including the extent to which they addressed the eight modernization requirements, varied significantly. The lack of detailed guidance contributed to the varied reporting, and the reporting requirement ended without producing consistent reports that could be used to reliably determine agency performance and government-wide progress.

Recent guidance clarifies the eight modernization requirements by including a number of actions that agencies should perform. This guidance provides the opportunity to improve oversight by tracking agency progress towards meeting the clarified requirements.²³

Agencies Did Not Consistently Address All Eight Website and Digital Service Modernization Requirements in Their Reports

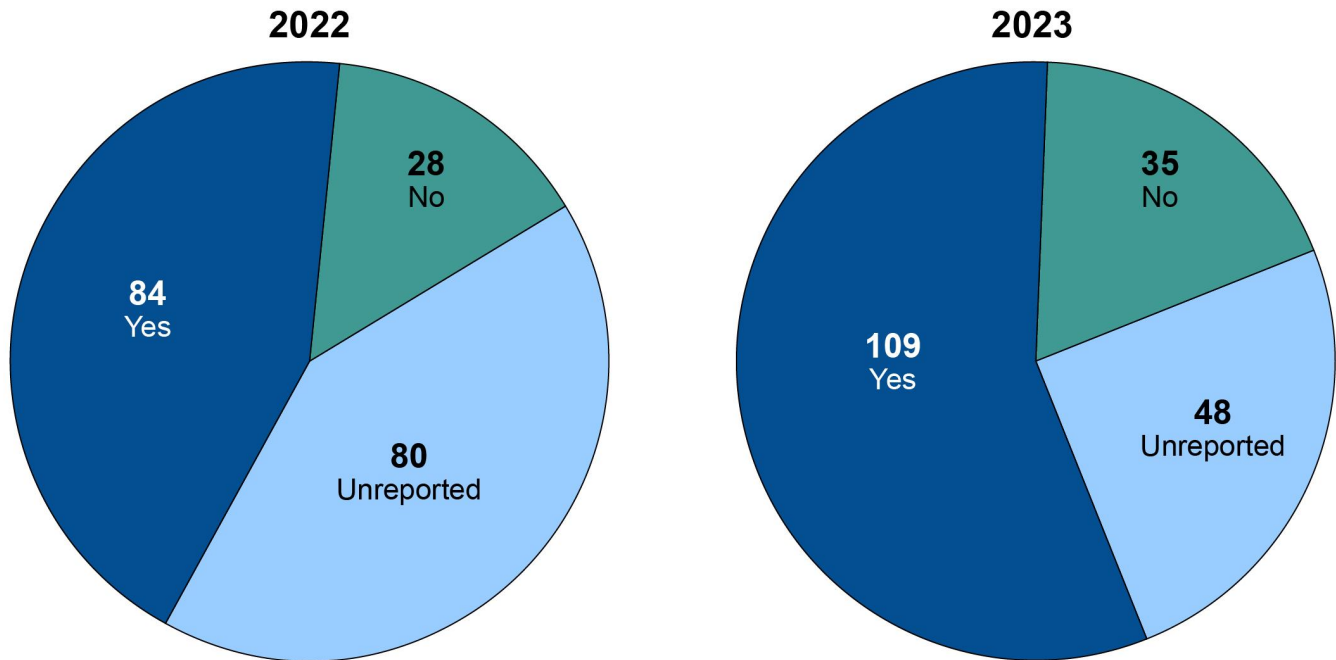
Agencies did not consistently address all eight modernization requirements for websites and digital services in their annual 21st Century IDEA reports. If the 24 CFO Act agencies addressed all eight requirements each year, the total number of addressed requirements would be 192. In 2022, 84 requirements were addressed and 28 requirements were not addressed in the 14 submitted reports. The balance of 80 requirements were unreported, as 10 agencies did not submit their 2022 reports. In 2023, the number of addressed requirements increased to 109 and the number that were not addressed also increased to 35. The number of missing reports dropped to six in 2023, decreasing the number of unreported requirements to 48. Figure 1 summarizes the number of requirements addressed in agencies' 2022 and 2023 annual reports.

²²The total number of required annual reports across all 24 CFO Act agencies over the 5 years was 120.

²³Office of Management and Budget, *Delivering a Digital-First Public Experience*, M-23-22 (Washington, D.C.: Sept. 22, 2023).

Figure 1: Number of Addressed Annual 21st Century Integrated Digital Experience Act Report Requirements in the 24 Chief Financial Officers Act of 1990 Agencies' 2022 and 2023 Reports

Number of Annual Report Requirements Addressed



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 1: Number of Addressed Annual 21st Century Integrated Digital Experience Act Report Requirements in the 24 Chief Financial Officers Act of 1990 Agencies' 2022 and 2023 Reports

2022

Yes	No	Unreported
84	28	80

2023

Yes	No	Unreported
109	35	48

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Further, the number of requirements addressed by each agency ranged from zero to all eight in both 2022 and 2023. In 2022, six agencies addressed all eight requirements: the Department of Education, the Department of Health and Human Services (HHS), Interior, the Environmental Protection Agency (EPA), the Nuclear Regulatory Commission (NRC), and the United States Agency for International Development (USAID). The remaining eight agencies that submitted their reports did not address all eight requirements. For example, the Department of Defense (DOD) addressed three requirements and the National Aeronautics and Space Administration (NASA) addressed four. The remaining 10 agencies did not submit their 2022 annual reports, so their progress towards meeting the eight requirements was unreported and, therefore, unknown. Table 1 shows the range of requirements addressed in the 2022 annual reports.

Table 1: Requirements Addressed in the 24 Chief Financial Officers Act of 1990 Agencies’ 2022 21st Century Integrated Digital Experience Act Annual Reports

Agency	Accessible	Consistent	Not duplicative	Searchable	Encrypted	User data-driven	Customizable	Mobile-friendly
Department of Agriculture	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of Commerce	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of Defense	Yes	No	No	No	Yes	Yes	No	No
Department of Education	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of Energy	Yes	Yes	No	Yes	No	Yes	Yes	Yes
Department of Health and Human Services	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of Homeland Security	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Department of Housing and Urban Development	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of Justice	No	No	No	No	No	No	No	No
Department of Labor	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of State	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of the Interior	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of the Treasury	Yes	Yes	No	Yes	Yes	Yes	No	Yes
Department of Transportation	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of Veterans Affairs	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Environmental Protection Agency	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
General Services Administration	Yes	Yes	Yes	No	No	Yes	No	Yes
National Aeronautics and Space Administration	No	Yes	Yes	Yes	No	Yes	No	No
National Science Foundation	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report

Agency	Accessible	Consistent	Not duplicative	Searchable	Encrypted	User data-driven	Customizable	Mobile-friendly
Nuclear Regulatory Commission	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Office of Personnel Management	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Small Business Administration	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Social Security Administration	Yes	Yes	No	No	No	Yes	Yes	Yes
U.S. Agency for International Development	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Source: GAO analysis of agencies' submitted 2022 21st Century Integrated Digital Experience Act annual reports. | GAO-24-106764

Note: Dashes ("-") indicate that the agency did not submit its 2022 21st Century Integrated Digital Experience Act report.

In 2023, the number of agencies addressing all eight requirements increased. Of the 18 submitted agency reports, seven addressed all eight requirements: the Department of Commerce, Education, DHS, Interior, EPA, NRC, and USAID. The remaining 11 agencies that submitted reports did not address all eight requirements. For example, DOD addressed three requirements, and the Department of Labor and NASA addressed four. Six agencies did not submit reports; consequently, their progress towards meeting the eight requirements was unknown. Table 2 shows the range of requirements addressed in the 2023 annual reports.

Table 2: Requirements Addressed in the 24 Chief Financial Officers Act of 1990 Agencies' Submitted 2023 21st Century Integrated Digital Experience Act Annual Reports

Agency	Accessible	Consistent	Not duplicative	Searchable	Encrypted	User data-driven	Customizable	Mobile-friendly
Department of Agriculture	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of Commerce	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of Defense	Yes	No	No	No	Yes	Yes	No	No
Department of Education	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of Energy	Yes	Yes	No	Yes	No	No	Yes	Yes
Department of Health and Human Services	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of Homeland Security	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of Housing and Urban Development	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Department of Justice	No	No	No	No	No	No	No	No
Department of Labor	Yes	Yes	No	Yes	No	Yes	No	No
Department of State	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of the Interior	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of the Treasury	Yes	Yes	No	Yes	No	Yes	No	Yes
Department of Transportation	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Department of Veterans Affairs	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
Environmental Protection Agency	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
General Services Administration	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
National Aeronautics and Space Administration	Yes	Yes	Yes	Yes	No	No	No	No
National Science Foundation	Yes	Yes	Yes	Yes	No	Yes	No	Yes
Nuclear Regulatory Commission	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Office of Personnel Management	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes

Agency	Accessible	Consistent	Not duplicative	Searchable	Encrypted	User data-driven	Customizable	Mobile-friendly
Small Business Administration	Yes	Yes	Yes	Yes	No	No	No	Yes
Social Security Administration	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report	did not submit report
U.S. Agency for International Development	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Source: GAO analysis of agencies' submitted 2023 21st Century Integrated Digital Experience Act annual reports. | GAO-24-106764

Note: Dashes ("-") indicate that the agency did not submit its 2023 21st Century Integrated Digital Experience Act report.

In 2022, agencies addressed the User data-driven requirement more than the other seven, with 13 (or 93 percent) of the 14 reports addressing it. The Customizable requirement was the least addressed, with eight (or 57 percent) of the 14 reports including the requirement. Agencies addressed the Accessible requirement the most in 2023, with 17 (or 94 percent) of the 18 reports addressing it. Customizable was the least addressed requirement in 2023, with nine (or 50 percent) of the agencies' reports addressing it.

Agencies' lack of reporting on all eight requirements does not necessarily mean a lack of compliance or progress. For instance, GSA informed us that it did not mention meeting the Encryption requirement in its 2022 and 2023 reports because it had already met the requirement before 21st Century IDEA was passed in 2018. Further, the Department of the Treasury reported that it did not include information on all of its progress due to instructions in the optional template stating not to exceed five pages. Without that particular guideline, Treasury indicated that it would have likely addressed the missing requirements.

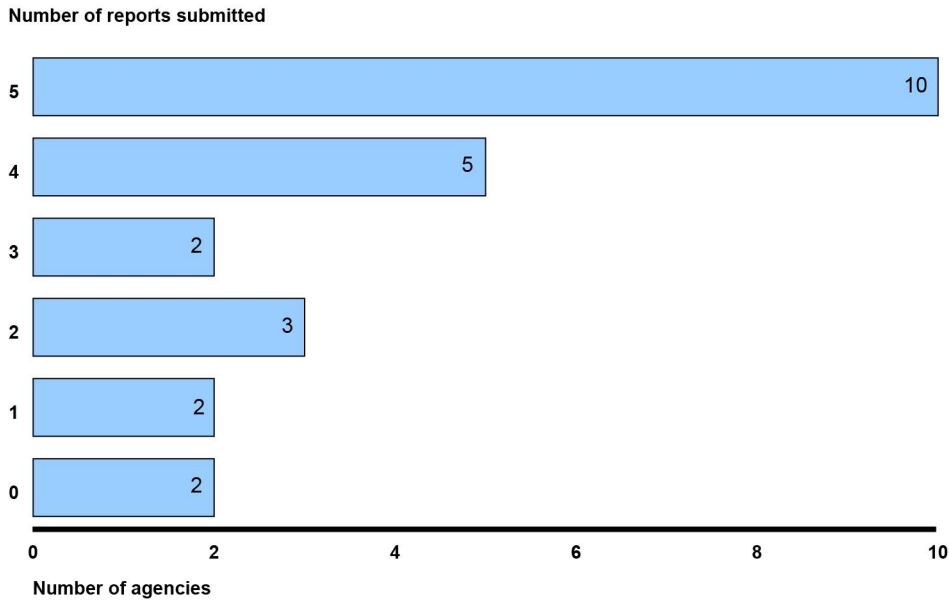
Agencies Did Not Consistently Submit Annual Reports on Compliance with the Modernization Requirements

The 24 CFO Act agencies did not consistently submit all five of their reports on progress towards meeting the eight website and digital service modernization requirements as statutorily required in 21st Century IDEA. As previously discussed, the act required agencies to submit five annual reports between December 2019 and December 2023 to OMB and the public. In all, agencies submitted 84 annual reports, which is 70 percent of the total number of 120 reports that the 24 CFO Act agencies were required to submit.

Of the 24 CFO Act agencies, 10 (or 42 percent) of the agencies submitted all five reports, five agencies (or 21 percent) submitted four reports, two agencies (or 8 percent) submitted three reports, three agencies (or 13 percent) submitted two reports, two agencies (or 8 percent) submitted one report, and two agencies (or 8 percent) did not submit any reports. Figure 2 illustrates how many reports were submitted by the individual agencies out of the five required reports.

Figure 2: Number of Annual 21st Century Integrated Digital Experience Act Report Submissions Made by the Individual 24 Chief Financial Officers Act of 1990 Agencies, 2019-2023

Number of Submissions Made by the Agencies Over 5 Years of Required Reporting



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 2: Number of Annual 21st Century Integrated Digital Experience Act Report Submissions Made by the Individual 24 Chief Financial Officers Act of 1990 Agencies, 2019-2023

Annual Report Year	Submitted Reports
5	10
4	5
3	2
2	3
1	2
0	2

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

While 10 agencies did submit all five reports, most agencies missed at least one submission. Table 3 details which agencies submitted each of the required reports.

Table 3: The 24 Chief Financial Officers Act of 1990 Agencies' 21st Century Integrated Digital Experience Act Annual Report Submissions, 2019-2023

Agency	2019	2020	2021	2022	2023	Total reports
Department of Agriculture	No	No	No	No	No	0 ^a
Department of Commerce	No	No	No	No	Yes	1
Department of Defense	No	Yes	Yes	Yes	Yes	4
Department of Education	Yes	Yes	Yes	Yes	Yes	5
Department of Energy	Yes	Yes	Yes	Yes	Yes	5
Department of Health and Human Services	Yes	Yes	Yes ^b	Yes ^b	No	4
Department of Homeland Security	Yes	Yes	Yes	Yes	Yes	5
Department of Housing and Urban Development	No	Yes	No	No	Yes	2
Department of Justice	Yes	Yes	Yes	Yes	Yes	5
Department of Labor	Yes	Yes	No	No	Yes	3
Department of State	Yes	No	Yes	No	No	2
Department of the Interior	Yes	Yes	Yes	Yes	Yes	5
Department of the Treasury	Yes	Yes	Yes	Yes	Yes	5
Department of Transportation	No	No	No	No	No	0
Department of Veterans Affairs	Yes	Yes	Yes	No	No ^c	3
Environmental Protection Agency	Yes	Yes	Yes	Yes	Yes	5
General Services Administration	Yes	Yes	Yes	Yes	Yes	5
National Aeronautics and Space Administration	Yes	Yes	Yes	Yes	Yes	5
National Science Foundation	Yes	No	No	No	Yes	2

Letter

Agency	2019	2020	2021	2022	2023	Total reports
Nuclear Regulatory Commission	Yes	Yes	Yes	Yes	Yes	5
Office of Personnel Management	No	No	No	No	Yes	1
Small Business Administration	Yes	Yes	Yes	No	Yes	4
Social Security Administration	Yes	Yes	Yes	Yes	No	4
U.S. Agency for International Development	Yes	No	Yes	Yes	Yes	4
Total reports submitted	18	17	17	14	18	84

Source: GAO analysis of agencies' submitted *21st Century Integrated Digital Experience Act* annual reports. | GAO-24-106764

Notes:

^aJust prior to the issuance of this report, the Department of Agriculture submitted a *21st Century Integrated Digital Experience Act* (21st Century IDEA) report that, according to the department, was to cover all required reporting periods. We acknowledge receipt of the report, but it was not received in time to incorporate into our analysis.

^bThe Department of Health and Human Services submitted one annual report to cover both 2021 and 2022 reporting requirements.

^cJust prior to the issuance of this report, the Department of Veterans Affairs submitted its 2023 21st Century IDEA report. We acknowledge receipt of the report, but it was not received in time to incorporate into our analysis.

The agencies provided rationales for not submitting the annual reports as required. For 2022, the year with the fewest number of submissions, five (or 50 percent) of the 10 agencies missing their reports cited a lack of OMB instruction as to why they did not submit their reports. Of the remaining five agencies that did not turn in their 2022 reports, two cited a lack of resources, two reported that they did not know why they did not submit the report, and one cited a lack of progress to report.

As for the annual reports due in December 2023, the majority of the agencies without submitted reports informed us that, as of June 2024, the reports were still forthcoming. Specifically, five of the six agencies without submitted 2023 reports affirmed that they still planned to issue the report.²⁴ One additional agency reported that it was not planning on submitting a report because, according to the agency, there was no longer a December 2023 reporting requirement, based on M-23-22. Contrary to this assertion, the 2023 report was statutorily required.²⁵

It is important to note that omissions may be limited to the reporting itself and do not necessarily reflect agencies' lack of actual compliance with the eight website and digital service modernization requirements in 21st Century IDEA. Missing reports, for instance, do not necessarily mean that there was no progress to report. For instance, the Department of Agriculture did not submit any of the annual reports. Yet, the department informed us that that it has met or is working to meet the eight requirements through its internal

²⁴As previously noted, the Departments of Agriculture and Veterans Affairs submitted 21st Century IDEA reports just prior to the issuance of this report. Agriculture submitted a report that, according to the agency, was to cover all required reporting periods, and Veterans Affairs submitted its report for 2023. We acknowledge receipt of the reports, but they were not received in time to incorporate into our analysis.

²⁵Pub. L. No. 115-336, §3(d).

web modernization initiative, which started in April 2020. Agriculture reported that this initiative aimed to provide a consistent experience across the department’s website and ensure usability and accessibility.²⁶

Submitted Reports Had Varying Levels of Content and Detail

The 24 CFO Act agencies’ submitted reports varied significantly in terms of content, the level of detail, and format. For instance, agencies continued to report on topics required for the 2019 report to Congress.²⁷ Specifically, five agencies included contents required for the report to Congress in 2022, and seven agencies included these contents in 2023.²⁸ While most of these agencies included these contents in addition to the annual report requirements, the Department of Justice’s 2022 and 2023 reports focused on the contents required for the report to Congress and did not mention the eight requirements explicitly.²⁹

Further, the amount of detail provided in the annual reports by the agencies varied greatly, with some agencies providing in-depth information on the work that they did to comply with the various requirements and others providing significantly less detail. In addition to the amount of detail, the agencies varied in how they reported compliance within their organizational levels. Specifically, some agencies reported on progress at the level of individual sites, some agencies reported on progress at the level of agency components, and other agencies reported on agency-wide initiatives.³⁰ Specific examples of the 2023 reports illustrate these differences.

- EPA’s 2023 report was markedly comprehensive. For example, EPA provided information on its modernization priorities, its data collection methodology, and a list of all of its external domains and subdomains. For each of the eight requirements, EPA provided a high-level summary of compliance for agency websites. In addition to the website-level reporting, EPA provided detailed explanations of the agency-wide initiatives that it undertook to comply with each requirement.
- DHS’s 2023 report was also particularly in-depth. As with EPA, DHS discussed agency-wide initiatives it implemented to improve its compliance with each requirement. Further, the report included a results section that listed which high-level websites met all eight requirements. The listed websites included www.dhs.gov, www.fema.gov, and www.tsa.gov.
- The National Science Foundation’s (NSF) 2023 report was focused mainly on progress made to its top websites, www.nsf.gov and www.research.gov. In its report, NSF indicated that it made progress towards

²⁶Just prior to the issuance of this report, Agriculture submitted a 21st Century IDEA report that, according to the department, was to cover all required reporting periods. We acknowledge receipt of the report, but it was not received in time to incorporate into our analysis.

²⁷As mentioned above, agencies were required to include a prioritized list of the most visited or used websites and digital services and cost and schedule information for those modernization efforts in their reports to Congress. In contrast, the annual report required agencies to report on progress made towards meeting the eight website and digital service modernization requirements.

²⁸In 2022, the five agencies that included contents required for the report to Congress were Education, the Department of Justice, Interior, EPA, and NRC. In 2023, the seven agencies that included Congressional report contents were Education, Justice, Interior, EPA, the National Science Foundation (NSF), NRC, and the Office of Personnel Management.

²⁹According to an official within Justice’s Office of the Chief Information Officer, Justice’s 21st Century IDEA reports included a “Project Status” column intended to communicate websites’ compliance with the eight modernization requirements. While Justice may have intended this column to convey that information, the 2022 and 2023 reports did not specifically provide that clarification. Accordingly, we concluded that the department did not address the requirements. See appendix I for more detail on our methodology.

³⁰For additional information on how the agencies reported on progress towards implementing the eight modernization requirements, see appendix II. Appendix II also includes illustrative examples of in-depth reporting on progress against the requirements.

six of the eight requirements.³¹ The most detailed discussion was for the Consistent requirement: the agency reported that its main site was being migrated to a new content management system. The other five requirements were mentioned in the report as areas of improvement, but the report did not give additional details.

In addition to variation in the content and level of detail, the use of GSA's optional annual report template and the overall formatting of report content varied widely among agencies. In their 2023 annual reports, 10 of the 18 submitted reports used the GSA template. Of those 10, Labor and Treasury used the entire template. Of the remaining eight agencies that used a modified version of the template, four only used the cover and/or background sections. Some of the agencies that did not use the optional GSA template had significantly different formats and reporting styles.

- NRC's 2022 and 2023 reports both contained a table that listed completion dates and future modernization costs for each of the eight requirements across specific applications. While the reports provided a status update on completed and ongoing work, neither report contained additional information explaining progress.
- USAID's 2022 report focused on two key websites and indicated with a yes or no whether the two sites met each of the eight requirements. In 2023, USAID changed its reporting to cover all of its public-facing websites. USAID reported that it changed the scope of its 2023 report to align with the requirements of M-23-22. As with the 2022 report, the 2023 report indicated with yes/no responses whether USAID's sites met each of the eight requirements. While the report does not state how the agency determined these yes/no responses, these responses provide a clear record of reported compliance against all eight requirements.
- Education's 2022 and 2023 reports provide an overview of the department's ongoing initiatives. In addition, both reports provide a status update on the percentage of department websites and services that are compliant with the eight requirements.³² For instance, in 2022, Education reported that 93 percent of its services met the Encrypted requirement. In 2023, that percentage increased to 99 percent. Conversely, the percentage of Education's services meeting the Accessible, Consistent, and Mobile-friendly requirements decreased between 2022 and 2023.³³ When asked about the decreased scores, an Education official informed us that it was not due to less compliance. Rather, the official stated that it was due to changing the categorization of forms that were mistakenly scored as websites in the department's 2022 calculations.

These differences in content, levels of detail, and formatting resulted in reports that had significant variance in thoroughness and transparency of agency progress in implementing the eight requirements.

³¹NSF addressed the following six requirements: Accessible, Consistent, Not duplicative, Searchable, User data-driven, and Mobile-friendly.

³²According to an Education official, the department determined the percentages by conducting annual internal data calls that consisted mostly of yes and no questions. The official stated that the total number of websites included in the data call determined the percentage calculations.

³³According to Education's annual 21st Century IDEA reports, (1) the department's percentage of websites and services meeting the Accessible requirement decreased from 86 percent in 2022 to 75 percent in 2023, (2) its percentage of websites and services meeting the Consistent requirement decreased from 26 percent to 21 percent, and (3) its percentage of websites and services meeting the Mobile-friendly requirement decreased from 56 percent to 52 percent.

Lack of Guidance During Reporting Period Contributed to Inconsistencies

The disparities in the reports are due, in large part, to the lack of clear reporting guidance, which resulted in agencies submitting reports ad hoc and interpreting aspects of compliance differently. For instance, the lack of OMB instruction was cited by half of the agencies that did not submit their 2022 annual reports as their rationale for not issuing the reports as required. Further, 21st Century IDEA is silent on what data the agencies should collect, how the data should be presented, and whether the reports must cover all eight requirements.

In addition to the lack of reporting guidance, agencies did not have sufficient guidance to standardize how they interpreted compliance with seven of the eight modernization requirements in 21st Century IDEA.³⁴ Although OMB issued related guidance prior to 21st Century IDEA, agencies expressed a need for guidance specifically related to the act's modernization requirements. For instance, in its 2022 report, GSA stated, "Clear direction from OMB to clarify expectations around how to comply with the law would go a long way toward helping web teams at GSA and across the Federal Government obtain the support they need to do this important work." Even though M-23-22 clarified compliance with the eight requirements, it had minimal effect on the annual report contents, due to it being issued just 3 months prior to the final report's due date. OMB informed us that M-23-22 did not address the annual reporting requirement because, among other things, the requirement was concluding just 3 months later.

As a result, agencies were allowed to interpret compliance differently throughout the reporting period. This, in turn, affected the usefulness of the annual reports, as it was unclear whether individual agencies were meeting the modernization requirements, even with the most complete reports. The agencies were also not held accountable for submitting the reports or demonstrating actual progress.

The last 21st Century IDEA report was due in December 2023. As such, the requirement has ended with missed opportunities to communicate progress achieved by the agencies, as intended, for a better understanding of progress made government-wide.

2023 Guidance Includes Detailed Actions to Implement Requirements

M-23-22 clarifies the website and digital service modernization requirements in 21st Century IDEA. It does so by describing a number of actions that the agencies should undertake to implement each of the eight modernization requirements. The memorandum also includes guidance for areas related to the eight modernization requirements, such as implementing more general security measures and making web content easy for users to understand.

M-23-22 also requires specific, short-term agency actions. These actions include, among other things, listing the top websites (based on average monthly users), providing OMB with a list of at least 10 opportunities to address web content duplication, and submitting an inventory of public-facing services. Other short-term actions required by M-23-22 include government-wide, collaborative actions to be taken by OMB, GSA, and others.

The actions required by M-23-22 collectively signal renewed opportunity and focus on improving federal websites and digital services. M-23-22 directs agencies to keep website and digital service information up-to-

³⁴Compliance with the Accessible requirement was statutorily defined in 21st Century IDEA. See Pub. L. No. 115-336, §3(a)(1).

date, update policies to ensure that agencies are meeting digital experience requirements, and review underperforming projects to identify challenges and develop corrective action plans. Specifically, OMB's guidance states that within 180 days of the September 22, 2023, issuance of M-23-22, executive agencies should address the requirements in the guidance to the fullest extent possible.

To help ensure that agencies are making progress, OMB will no longer use the annual agency report requirement that sunsetted after the fifth year reports were to be submitted in December 2023. Instead, OMB's guidance notes the following actions:

- Within 30 days of the September 22, 2023, guidance, agencies were to identify a primary point-of-contact to be the lead agency official for addressing digital experience.
- Agency Chief Information Officers should (1) periodically review policies and processes to ensure that websites and digital services meet applicable requirements, and (2) evaluate IT investments to identify struggling or underperforming websites and digital services that are not aligned with the requirements in M-23-22.
- Within 90 days of issuance, M-23-22 also required agencies to review data maintained by GSA's Site Scanning Program and identify their public-facing websites to OMB. According to GSA, this program scans public federal websites and generates data about website health, policy compliance, and best practices. According to GSA, this program's core is the Federal Website Index, which lists all public federal .gov sites by agency.³⁵

An OMB staff member stated that OMB and GSA are exploring the use of automatic scanning tools to assess compliance with the modernization requirements. In addition to requiring the use of GSA's Site Scanning Program to identify their websites, M-23-22 also supports the use of scanning tools to help agencies detect issues with accessibility and assess their public-facing websites.

The development and use of these tools or an alternative oversight mechanism may provide valuable insight into compliance with the clarified website and digital service requirements in M-23-22. For these tools to be of use and provide an accurate view of performance government-wide, the results must be consistently monitored and reviewed to ensure that continuous and sustained progress is made.

Selected HISPs Leveraged Technical Resources and Collaboration to Meet Key Provisions of 21st Century IDEA

As previously stated, the selected HISPs are subject to the same website and digital service modernization requirements in 21st Century IDEA as their parent departments and other executive agencies. All four selected HISPs leveraged technical resources to meet the requirements related to modernizing federal websites and digital services and enhancing the user's customer experience. As part of their improvement efforts, they used resources from GSA's TTS. As previously mentioned, compliance with the website standards of GSA's TTS is a requirement of 21st Century IDEA. The HISPs stated that they used the following TTS tools:

³⁵Data from daily scans on 26,000 federal .gov websites are publicly available for download. For more information and to access this data, see <https://digital.gov/guides/site-scanning/>.

- **Digital Analytics Program (DAP).** DAP offers web analytics tools and support to help the government make data-driven decisions to improve the public's digital experience with federal services.³⁶ DAP uses Google Analytics 360 to measure traffic and engagement across thousands of federal government websites and applications, reporting analytics under a single federal-wide shared account.³⁷ Consular Affairs, FEMA, and FWS reported that they used DAP. For example, Consular Affairs reported that it participated in DAP for its travel websites and used the data to inform customer experience improvement activities.
- **The Federal Risk and Authorization Management Program (FedRAMP).** FedRAMP is a government-wide program that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services. Consular Affairs, FEMA, and FWS reported using FedRAMP. Specifically, FEMA reported that its disaster assistance website used FedRAMP solutions to help with accreditation for cloud-based services.
- **Search.gov.** Search.gov creates a standard search experience across government websites that is intended to provide the public with quick, easy access to government information and services. FEMA reported that it used Search.gov.
- **United States Web Design System (USWDS).** USWDS is a design system for the federal government that is intended to make it easier to build accessible, mobile-friendly government websites. All four selected HISPs reported that they used this tool. For example, TSA reported that it used USWDS elements of style—such as those that determine colors, fonts, spacing, and icons—to create a coherent and recognizable web presence.
- **Login.gov.** This website provides one account to each member of the public to access participating government services online. Consular Affairs, FEMA, and FWS reported that they used or were transitioning to Login.gov. For example, FEMA reported that its disaster assistance website used Login.gov to provide a secure multi-factor authentication solution.
- **Touchpoints.** Touchpoints offers a way for the government to collect customer feedback through surveys. Consular Affairs and FWS reported that they used Touchpoints. An FWS official stated that Touchpoints surveys on the main FWS website receive input from the public on how to improve its services. The official further stated that the results from these surveys are compiled and reviewed and, if approved, are used to make changes to the website.

In their efforts to meet the digital improvement requirements of 21st Century IDEA, the selected HISPs also used technological resources other than GSA's TTS solutions:

- **Survey platforms.** All four selected HISPs reported using survey platforms to collect customer feedback. For instance, an office within FEMA reported that FEMA conducts yearly user surveys to, among other things, gauge the user's ability to navigate the site effectively. FEMA also reported that it used customer satisfaction surveys with disaster survivors to better inform updates to the disaster assistance government website and its resources.³⁸

³⁶Web analytics provide valuable insights into how users interact with a website. The data gained from web analytics is used to identify areas for improvement and make data-driven decisions.

³⁷Google Analytics 360 is the paid, enterprise version of Google Analytics 4, a tool used to measure and track website metrics.

³⁸FEMA's disaster assistance website is <https://www.disasterassistance.gov/>.

- **Website evaluation tool.** FEMA, FWS, and TSA reported that they used Siteimprove, which is an evaluation tool that is designed to scan websites for issues relating to accessibility, search engine optimization, and content quality.³⁹ For example, FWS reported that it installed the Siteimprove module so that employees could be made aware of website defects.
- **Google Analytics.** Google Analytics is a tool used to measure and track website metrics. Consular Affairs, FEMA, and TSA reported that they used this tool. For example, TSA reported that it used Google Analytics to measure and track metrics such as the number of visitors, page views, the average time on page, and the sources of web traffic, among other things. TSA further reported that it used these metrics to improve its main website.
- **Social media.** FEMA and Consular Affairs reported that they used social media to help with customer experience. For example, FEMA reported that it has an office that routinely identifies topics of concern relevant to FEMA operations from open sources online, such as social media, to inform agency messaging and service delivery.
- **Journey mapping.** The process of journey mapping provides stakeholders with a common understanding of how a customer interacts with a service. All four HISPs reported they used this strategy. For example, FWS officials stated that they used journey mapping to review routine website usage.

As previously mentioned, 21st Century IDEA requires agencies to coordinate with other agencies and seek to maintain standardization and commonality. Consistent with the act, the selected HISPs leveraged collaborative groups to discuss best practices related to modernizing web resources and implementing improvements related to customer experience:

- **OMB's Customer Experience (CX) team.** OMB's CX team is part of a broad network of customer experience teams across the government.⁴⁰ All four selected HISPs reported that they worked with OMB's CX team. For example, FEMA reported working closely with the team to ensure that its delivery of disaster assistance registration information was in line with government best practices.
- **Internal communities of practice.** All four of the selected HISPs reported that they participated in internal communities that collaboratively work to improve customer experience. For instance, FWS reported that it coordinated closely with the Department of Interior Web Council, and FEMA reported that it participated in the DHS Enterprise Web Council.⁴¹ FWS officials stated that the Department of Interior Web Council's meetings discussed information related to website development and customer experience. They also stated that the council recently met to respond to reporting requirements from M-23-22. The officials further said the council worked to formulate the Department of Interior's policy related to 21st Century IDEA.
- **External groups that discuss customer experience issues.** Consular Affairs, FEMA, and FWS reported that they participated in external federal communities that collaboratively work to improve customer experience. Further, Consular Affairs reported that it participated in a formal OMB and

³⁹Search engine optimization is the practice of enabling search engines to index and surface content. This practice fosters transparency and enhances user experience by allowing the public to navigate complex programs and find the information they need quickly.

⁴⁰For more information on OMB's CX team and other customer experience resources, see GAO, *Federal Customer Experience: OMB Has Taken Actions to Implement Cross-Agency Priority Goals*, [GAO-24-106632](#) (Washington, D.C.: June 6, 2024).

⁴¹According to the group charter, the purpose of the DHS Enterprise Public Web Council is to help the DHS web community streamline customer access to DHS services, improve DHS web content management, and reduce costs for DHS public-facing websites.

Partnership for Public Service customer experience executive cohort that met monthly to discuss the challenges and opportunities related to establishing customer experience programs.⁴²

Agency Comments and Our Evaluation

We provided a draft of this report to OMB and the 24 CFO Act agencies for review and comment. One agency concurred with our findings, OMB and six agencies commented on our report but neither agreed nor disagreed with our findings, 16 stated that they had no comments on our report, and one agency did not respond.

DOD concurred with our report. In an email dated September 9, 2024, a Supervisory Management Analyst within DOD's Audit Management Division stated that DOD concurred with the contents of the report.

The following agencies commented on the report but neither agreed nor disagreed with our results:

- In comments sent via an email dated September 17, 2024, from an Assistant General Counsel in OMB's Office of General Counsel, OMB asserted that it does not have a legal responsibility to provide guidance on either the modernization requirements or the reporting process. We did not attest to OMB having any such legal responsibility in the report. OMB's comments further explained that M-23-22 was not issued to offer an authoritative interpretation of 21st Century IDEA requirements. To illustrate this point, OMB remarked that an agency that failed to follow an aspect of M-23-22 would not necessarily also fail to comply with 21st Century IDEA. While we acknowledge that M-23-22 does not change the statutory requirements, it does provide clarifying guidance that guides agencies' implementation of 21st Century IDEA. OMB also provided technical comments, which we incorporated as appropriate.
- In an email dated September 13, 2024, the Director of Digital Communications within Agriculture's Office of Communications stated that Agriculture had made progress in meeting the requirements of 21st Century IDEA through its Web Modernization Initiative. In a separate email, the official also submitted a 21st Century IDEA report intended to cover all previous years of missed reporting. We acknowledge receipt of the report, but it was not received in time to incorporate into our analysis.
- In an email dated September 16, 2024, a Deputy Director in HUD's Office of the Secretary stated that HUD affirmed its commitment to improving the digital experience for its customers in line with 21st Century IDEA and M-22-23.
- In an email dated September 13, 2024, an IT Audit Liaison within Justice's Office of the Chief Information Officer provided alternate language for the report, stating that Justice's 21st Century IDEA reports included a "Project Status" column intended to communicate each website's compliance with the eight modernization requirements. While Justice may have intended this column to convey that information, the 2022 and 2023 reports did not specifically provide that clarification. Accordingly, we concluded that the department did not address the requirements. See appendix I for more detail on our methodology.
- In an email dated September 6, 2023, a Deputy Director in Transportation's Office of the Secretary stated that Transportation's Office of the Chief Information Officer did not report per 21st Century IDEA because OMB had not issued guidance on the implementation of the act. Our report acknowledges that OMB did not issue related guidance prior to the issuance of M-23-22.

⁴²The Partnership for Public Service's website stated that it is a nonprofit and nonpartisan organization. Its stated goals include rebuilding public trust in the government and helping federal agencies meet customer needs.

- In written comments reprinted in appendix III, the Department of Veterans Affairs neither agreed nor disagreed with our report. The response stated that the department has completed drafting its 2023 21st Century IDEA report. In a subsequent email dated September 18, 2024, a Management Analyst in Veterans Affairs' Office of Information and Technology submitted the department's 2023 report. We acknowledge receipt of the report, but it was not received in time to incorporate into our analysis.
- In written comments reprinted in appendix IV, USAID neither agreed nor disagreed with our report. The agency affirmed that it remains committed to the goals of 21st Century IDEA and that it will continue to comply with the eight requirements.

Fifteen of the 16 agencies that stated that they did not have comments responded via email: Commerce, Education, Energy, HHS, DHS, Labor, Interior, State, Treasury, EPA, GSA, NASA, NSF, NRC, and the Office of Personnel Management. One agency, the Social Security Administration, informed us that it did not have comments in a letter reprinted in appendix V.

The remaining agency, the Small Business Administration, did not provide any statements on our report.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 4 days from the report date. At that time, we will send copies to appropriate congressional committees, the heads of the 24 CFO Act agencies, and the Director of OMB. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

Letter

If you or your staff have any questions on the matters discussed in this report, please contact me at (202) 512-4456 or at harriscc@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VI.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Harris", with a long horizontal flourish extending to the right.

Carol C. Harris
Director, Information Technology and Cybersecurity Issues

Appendix I: Objectives, Scope, and Methodology

Our objectives were to: (1) determine the reported status of agencies' efforts to comply with key website and digital service modernization provisions in the *21st Century Integrated Digital Experience Act* (21st Century IDEA) and (2) describe the actions taken to comply with the act by selected federal entities that provide or fund high-impact customer-facing services.¹

To address the first objective, we first determined that all executive agencies with public-facing websites were required to follow the requirements of 21st Century IDEA. We chose to focus our review on the 24 *Chief Financial Officers Act of 1990* (CFO Act) agencies because they are generally the largest agencies, and they provide the highest-impact services to the public.²

We then conducted an in-depth analysis of agencies' annual reports that were required to be submitted to the Office of Management and Budget (OMB) and be made publicly available in December 2022 and December 2023.³ Our in-depth analysis of agencies' 21st Century IDEA reports summarized and ascertained the extent to which they addressed all eight requirements found in Section 3(a) of the act.⁴ For this analysis, we focused on the two most recent reports: those from 2022 and 2023. For each of the submitted reports from 2022 and 2023, multiple analysts used professional judgment to examine the extent to which the reports addressed all eight website and digital service modernization requirements in 21st Century IDEA. As there were not any reporting standards, we accepted any mention of progress or ongoing work explicitly tied to a requirement as addressing the requirement. If a requirement was mentioned only in terms of plans to start planning for future initiatives, we did not consider the requirement to be addressed, as no actual progress was discussed. As part of the review process, the multiple analysts came to consensus on which requirements each of the reports addressed.

If we determined that an agency's report addressed a requirement, the multiple analysts then ascertained the organizational level at which the agency presented that progress. We defined "level" as how the reporting fits into the agency's hierarchy. Specifically, we reviewed the reports to determine if the agencies were conveying progress against the requirements at the level of the entire agency (such as providing agency-wide implementation percentages), at the level of program offices or components (such as discussing initiatives performed across a component's sites), or at the level of individual sites or services (such as discussing progress made to a single website or a group of websites). If we determined that an agency reported at

¹Pub. L. No. 115-336, 132 Stat. 5025-5028 (2018), 44 U.S.C. § 3501 note. HISPs are federal entities that are designated by the Office of Management and Budget as providing or funding customer-facing services that have a high impact on the public, whether because of a large customer base or a critical effect on those served.

²The 24 agencies covered by the CFO Act are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, Justice, Labor, State, the Interior, the Treasury, Transportation, and Veterans Affairs; the Environmental Protection Agency; the General Services Administration; the National Aeronautics and Space Administration; the National Science Foundation; the Nuclear Regulatory Commission; the Office of Personnel Management; the Small Business Administration; the Social Security Administration; and the U.S. Agency for International Development. Pub. L. No. 101-576, 104 Stat. 2838 (Nov. 15, 1990), as amended (codified at 31 U.S.C. § 901(b)).

³The annual reporting requirement is listed in Section 3(d) of 21st Century IDEA. See Pub. L. No. 115-336, §3(d).

⁴Section 3(a) of 21st Century IDEA requires that websites and digital services be: (1) Accessible, (2) Consistent, (3) Not duplicative, (4) Searchable, (5) Encrypted, (6) User data-driven, (7) Customizable, and (8) Mobile-friendly.

multiple levels, we assigned the score to the highest of the levels discussed. For instance, if we determined that an agency reported on a requirement at both the level of individual sites and at an agency-wide level, we would ultimately determine that the report addressed the requirement at the agency-wide level. If progress was mentioned without any detail that could link it to a specific level, we determined that the requirement was addressed without detail. As part of the review process, the multiple analysts came to consensus on the level of reporting.

In addition, we also reviewed the formatting, scope, and level of detail of the reports from 2022 and 2023 to determine how progress was reported. For instance, we determined which reports presented data using concrete numbers and percentages. We also used the optional GSA annual report template as a point of comparison between the various reporting types. Specifically, we determined whether the agencies used the entire template, modified the template, or did not use the template. We also determined whether the reports continued to include contents specifically required for the December 2019 report to Congress, such as a prioritized list of the agency's most visited websites and digital services needing modernization.

We also collected and reviewed all five annual reports that were required to be submitted to OMB and the public between December 2019 and December 2023 to identify the extent to which reports were missing.⁵ For any missing reports, we obtained the rationales for why they were not submitted. For the missing 2022 and 2023 reports, we also categorized the agencies' rationales.

We supplemented our analyses with information obtained by interviewing knowledgeable agency officials who were involved with managing or modernizing agency digital services, as well as those who compiled and issued the annual 21st Century IDEA reports. We also interviewed knowledgeable OMB staff about requirements and guidance related to 21st Century IDEA.

To address the second objective, we first reviewed the list of 35 High Impact Service Providers (HISP) identified by OMB from 2023 on GSA's performance website.⁶ We used the list to select a group of four HISPs to review. Specifically, we identified the four HISPs by applying a selection methodology and chose HISPs that had a significant impact on a large number and variety of individual citizens. To do so, we first reviewed the complete list of 35 2023 HISPs, and we excluded any HISPs that were named as a HISP in 2022 or 2023. We also removed any HISP managed by more than one agency. Any HISPs that were not yet eliminated were moved to the next round of review.

In the second round of review, we excluded HISPs that primarily served businesses or organizations rather than individual citizens. We also applied professional judgment to exclude HISPs that served a limited group of people in order to ensure that the selected HISPs served a wide variety of Americans. Further, we removed any HISP that was being evaluated in our recent or ongoing work related to customer experience issues. Finally, we eliminated one HISP due to a team member's potential conflict of interest.

For any HISPs that we did not eliminate over the two rounds of review, we consulted with internal subject matter experts to determine if the HISPs should be included in our analysis. We eliminated any HISPs if stakeholders raised a valid objection to their inclusion. For instance, we eliminated one HISP because a stakeholder informed us that we would be duplicating recently released GAO work. We also eliminated one

⁵The annual reporting requirement is listed in Section 3(d) of 21st Century IDEA. See Pub. L. No. 115-336, §3(d).

⁶GSA's performance website is <https://www.performance.gov/>.

other HISP due to feedback from internal stakeholders about the complexities of the HISP's programs, including the fact that the programs varied based on location. Through this process of elimination, we selected the following four HISPs:

- the Department of State's Bureau of Consular Affairs,
- the Department of Homeland Security's (DHS) Federal Emergency Management Agency,
- the Department of Interior's Fish and Wildlife Service, and
- DHS's Transportation Security Administration.

After selecting the four HISPs listed above, we requested information related to the ways in which they worked to meet 21st Century IDEA requirements and improve their websites and digital services. As HISPs manage public-facing websites, they are required to meet the eight website and digital service modernization requirements in 21st Century IDEA.⁷ For our review, we obtained information from agency officials about the tools, standards, and methodologies that have been utilized for their modernization projects. We also asked about any new or existing boards, offices, or staff positions assisting with the implementation of these modernization initiatives. Further, we analyzed documentation provided by the HISPs, which included council charters, modernization plans, survey data, monthly council reports, HISP action plans, and other agency documentation showing progress towards 21st Century IDEA compliance. In our analysis, we also reviewed evidence of customer experience-related resources. We supplemented our analyses with a review of documentation from agencies, including policies and guidance referenced by the HISPs, documentation on the use of the tools, and charters for any designated oversight groups. We identified the total number of selected HISPs using each reported resource. We also interviewed representatives from selected HISPs to gather and clarify information.

We conducted this performance audit from April 2023 to September 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁷Pub. L. No. 115-336, §3(a).

Appendix II: Description of Agencies' 2023 21st Century IDEA Reports

The contents of the 24 *Chief Financial Officers Act of 1990* (CFO Act) agencies' annual 2023 *21st Century Integrated Digital Experience Act* (21st Century IDEA) reports varied significantly. In addition to not consistently discussing the eight requirements for modernizing websites and digital services, the agencies reported progress at various organizational levels.¹ These levels represent how the reporting fits into the agency's hierarchy. Specifically, a given requirement could be:

- **Not addressed.** Progress or ongoing work against the requirement was not mentioned or explicitly discussed.² This is the only level that corresponds to a determination that the report did not address the requirement.
- **Mentioned without detail.** Progress towards implementing a requirement was mentioned, but additional details were not included. This determination meant that the report addressed the requirement.
- **Presented at the level of individual websites or services.** Progress against a requirement was communicated through an examination of one or more individual sites or services. This determination meant that the report addressed the requirement.
- **Presented at the level of agency components.** Progress against a requirement was communicated with discussions of improvements and initiatives made at the component level. This determination meant that the report addressed the requirement.
- **Presented at an agency-wide level.** Progress against a requirement was communicated with discussions of agency-wide improvements and initiatives. This determination meant that the report addressed the requirement.

Due to the various ways and levels at which progress was discussed, it was impracticable to compare compliance from agency to agency, even when agencies provided detailed accounts of the initiatives they took to meet the eight modernization requirements.

In the following sections, we summarize the level at which the agencies reported progress against each of the eight modernization requirements in their 2023 annual reports. For each requirement, we also include a selection from an agency's 2023 report to give an illustrative example of detailed agency reporting.

Requirement 1: Accessible

Of the 18 submitted annual 21st Century IDEA reports for 2023, eight reported progress made related to the Accessible requirement at the agency-wide level. Of the remaining 10 reports, one presented progress at the component level, five presented progress at the level of websites or services, three mentioned progress

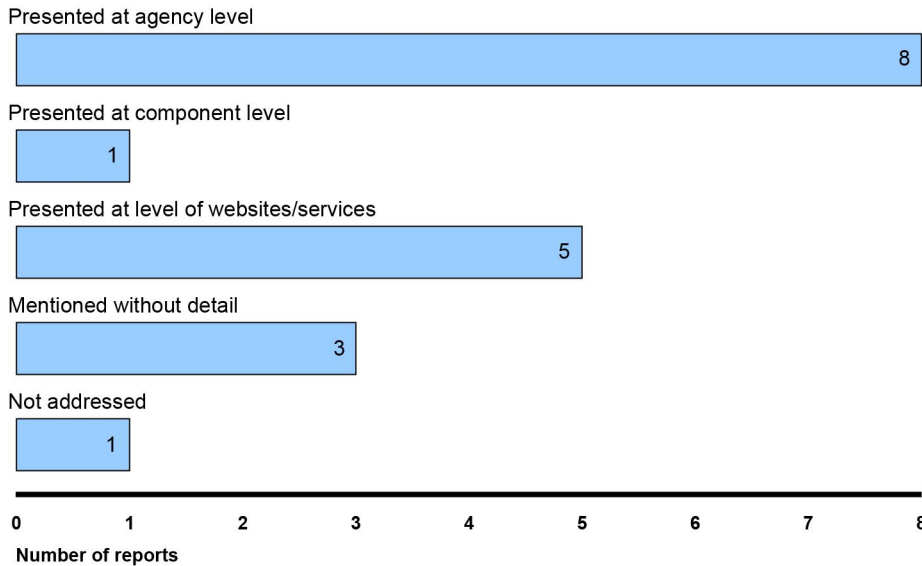
¹As described earlier in the report, 21st Century IDEA requires that all websites and digital services be: (1) Accessible, (2) Consistent, (3) Not duplicative, (4) Searchable, (5) Encrypted, (6) User data-driven, (7) Customizable, and (8) Mobile-friendly.

²If an agency only mentioned plans to start planning for future initiatives to achieve compliance against a requirement and not any actual progress or ongoing work, we also concluded that the requirement was not addressed.

without providing significant detail, and one did not address the requirement. The breakdown of the level of discussion is illustrated in figure 3.

Figure 3: Level of Agency Discussion for the Accessible Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the Accessible Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 3: Level of Agency Discussion for the Accessible Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	8
Presented at component level	1
Presented at level of websites/services	5
Mentioned w/o detail	3
Not addressed	1

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

The Department of Defense (DOD) was one of the agencies that discussed progress toward the Accessible requirement at the agency-wide level in its 2023 annual report. Specifically, DOD's report included multiple examples of departmental initiatives to achieve Section 508 compliance. Of note, the report stated that it tested the military services' public websites in 2021, 2022, and 2023 and remediated many accessibility barriers within the American Forces Public Information Management System (AFPIMS) framework.³ In addition, DOD stated that it monitored its public sites for compliance with Section 508 by performing manual tests of webpages using the Department of Homeland Security Trusted Tester test method and certified testers. DOD further stated that it worked with GSA to allow them to scan .mil website domains for accessibility

³According to DOD, AFPIMS is a combination of hardware and software used to manage public-facing departmental websites. The software component of AFPIMS is called the content management system. The premise of AFPIMS is users can apply the content management system's functionality to create and manage pages on their websites.

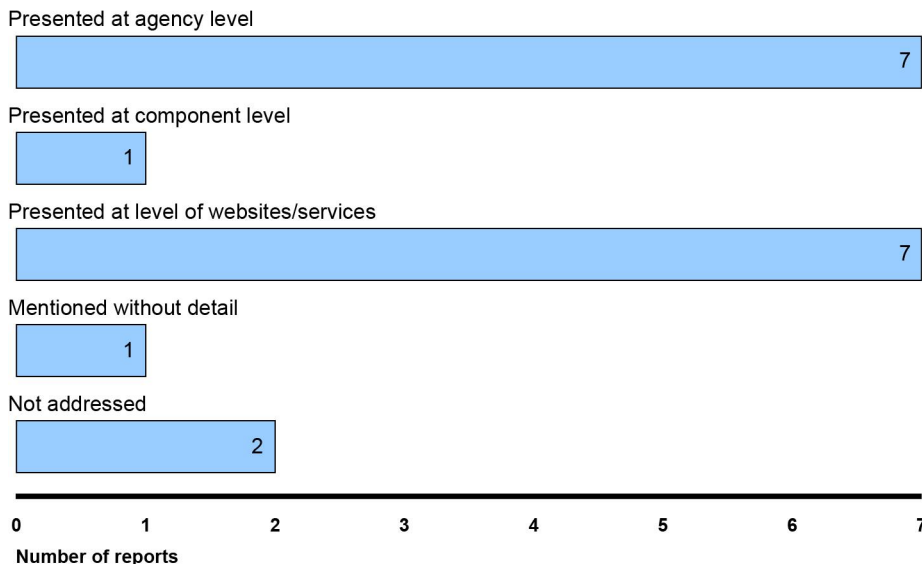
conformance. As for results, the report stated that a recent audit of Office of the Secretary of Defense public websites found overall compliance with Section 508 standards to be 83.5 percent.

Requirement 2: Consistent

Of the 18 submitted annual 21st Century IDEA reports for 2023, seven reported progress made to meet the Consistent requirement at the agency-wide level. Of the remaining 11 reports, one presented progress at the component level, seven presented progress at the level of websites or services, one mentioned progress without providing significant detail, and two did not address the requirement. The breakdown of the level of discussion is illustrated in figure 4.

Figure 4: Level of Agency Discussion for the Consistent Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the Consistent Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 4: Level of Agency Discussion for the Consistent Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	7
Presented at component level	1
Presented at level of websites/services	7
Mentioned w/o detail	1
Not addressed	2

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

The Department of Treasury was the agency that discussed progress against the Consistent requirement at the component level. Specifically, Treasury's 2023 report states that the Alcohol and Tobacco Tax and Trade Bureau (TTB) launched new services that reside on a platform using a design system based on the U.S. Web

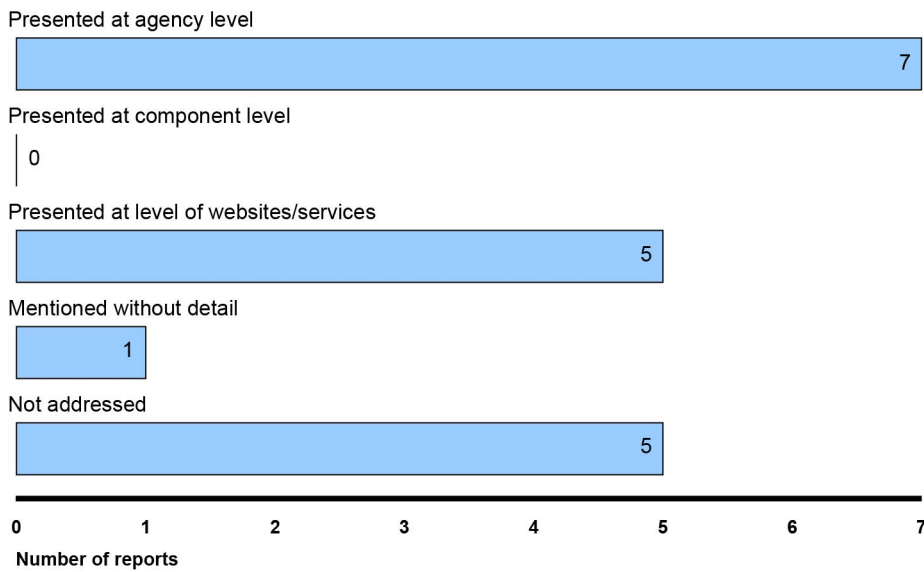
Design System (USWDS). Treasury reports that this design system provides a consistent look and feel across the new TTB websites and services. In addition to TTB, Treasury's report also states that both the Internal Revenue Service and Treasury Departmental (Headquarters) Offices use design standards in alignment with USWDS.

Requirement 3: Not Duplicative

Of the 18 submitted annual 21st Century IDEA reports for 2023, seven reported progress made related to the Not duplicative requirement at the agency-wide level. Of the remaining 11 reports, five presented progress at the level of websites or services, one mentioned progress without providing significant detail, and five did not address the requirement. No agencies discussed progress at the component level for this particular requirement. The breakdown of the level of discussion is illustrated in figure 5.

Figure 5: Level of Agency Discussion for the Not Duplicative Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the Not Duplicative Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 5: Level of Agency Discussion for the Not Duplicative Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	7
Presented at component level	0
Presented at level of websites/services	5
Mentioned w/o detail	1
Not addressed	5

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

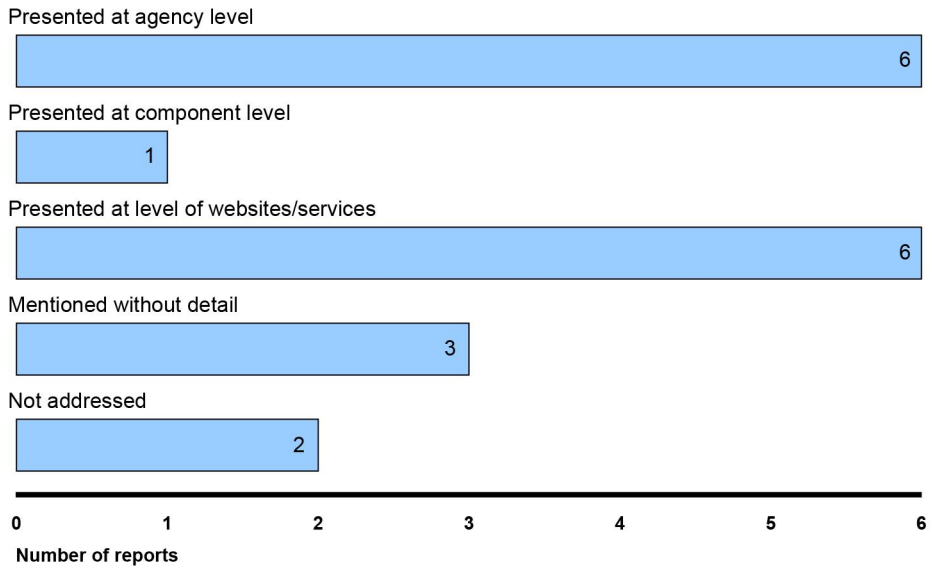
The General Services Administration (GSA) was one of the agencies that discussed progress against the Not duplicative requirement at the agency-wide level in its 2023 report. Specifically, GSA stated that it had reduced its inventory of active public-facing websites by 25 percent since 2019. In addition, GSA stated that it developed a Digital Lifecycle Program to ensure that new sites and digital services are (1) created with more deliberation and understanding of long-term support needs, (2) managed according to federal web requirements, and (3) decommissioned in a way that causes minimal disruption to users. Further, GSA noted that it trained web teams, among other things, to conduct content audits. GSA also stated that it is continually improving content management and governance practices across the agency.

Requirement 4: Searchable

Of the 18 submitted annual 21st Century IDEA reports for 2023, six reported progress made related to the Searchable requirement at the agency-wide level. Of the remaining 12 reports, one presented progress at the component level, six presented progress at the level of websites or services, three mentioned progress without providing significant detail, and two did not address the requirement. The breakdown of the level of discussion is illustrated in figure 6.

Figure 6: Level of Agency Discussion for the Searchable Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the Searchable Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 6: Level of Agency Discussion for the Searchable Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	6
Presented at component level	1
Presented at level of websites/services	6
Mentioned w/o detail	3
Not addressed	2

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

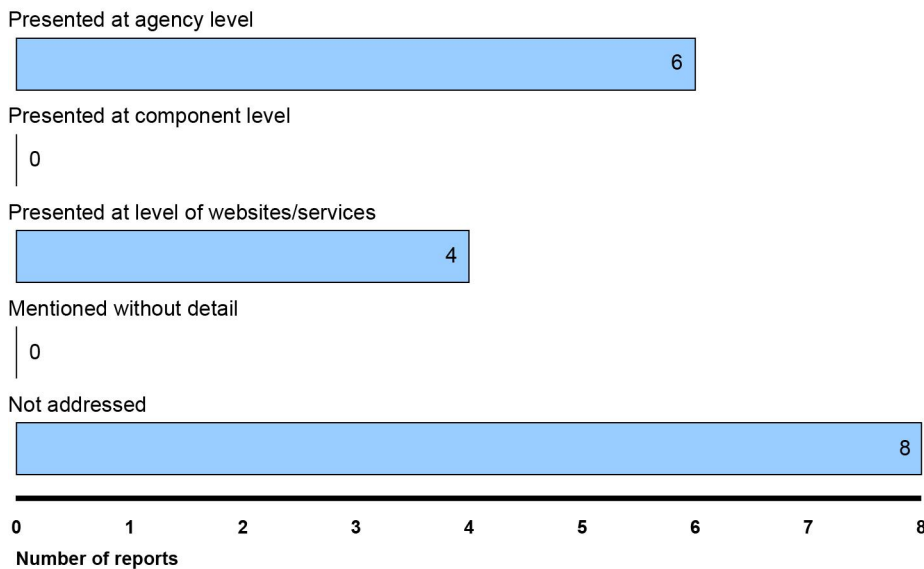
The Environmental Protection Agency (EPA) was one of the agencies that discussed progress against the Searchable requirement at the agency-wide level in its 2023 annual report. Specifically, EPA listed a number of initiatives to help ensure compliance with the Searchable requirement. These initiatives included EPA's search interface being built into its standard website template, ensuring that search appears on every page. EPA stated that its search collection is available to both EPA's internal search engine and to external search engines such as Google and Bing. The agency also reported that it provided guidance on coding its content to include the proper metadata to improve discoverability. Further, EPA stated that it used web analytics data to improve the agency's search engine. Finally, the agency stated that it reviewed survey results and Google Analytics data to find popular search terms and manually update the list of "Best Bets" to ensure that best results show up first.

Requirement 5: Encrypted

Of the 18 submitted annual 21st Century IDEA reports for 2023, six reported progress made related to the Encrypted requirement at the agency-wide level. Of the remaining 12 reports, four presented progress at the level of websites or services and eight did not address the requirement. No agencies discussed progress at the component level for this requirement. In addition, no agencies mentioned progress without including additional detail. The breakdown of the level of discussion is illustrated in figure 7.

Figure 7: Level of Agency Discussion for the Encrypted Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the Encrypted Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 7: Level of Agency Discussion for the Encrypted Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	6
Presented at component level	0
Presented at level of websites/services	4
Mentioned w/o detail	0
Not addressed	8

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

The Department of Homeland Security (DHS) was one of the agencies that discussed progress against the Encrypted requirement at the agency-wide level in its 2023 annual report. Specifically, DHS reported that all of its websites and digital services met OMB's requirements for the use of secure connections (Hypertext

Transfer Protocol Secure (HTTPS)).⁴ DHS further stated that it met OMB's requirements for automatic redirection from Hypertext Transfer Protocol (HTTP)⁵ to HTTPS and the use of HTTP Strict Transport Security (HSTS).⁶ DHS reported that it also used an edge content delivery network (CDN) to ensure security and availability of its public-facing websites and digital services.⁷

Requirement 6: User Data-Driven

Of the 18 submitted annual 21st Century IDEA reports for 2023, eight reported progress made related to the User data-driven requirement at the agency-wide level. Of the remaining 10 reports, one presented progress at the component level, four presented progress at the level of websites or services, one mentioned progress without providing significant detail, and four did not address the requirement. The breakdown of the level of discussion is illustrated in figure 8.

⁴HTTPS verifies the identity of a website or web service for a connecting client and encrypts nearly all information sent between the website or service and the user. Protected information includes cookies, user agent details, Uniform Resource Locator (URL) paths, form submissions, and query string parameters. HTTPS is designed to prevent this information from being read or changed while in transit.

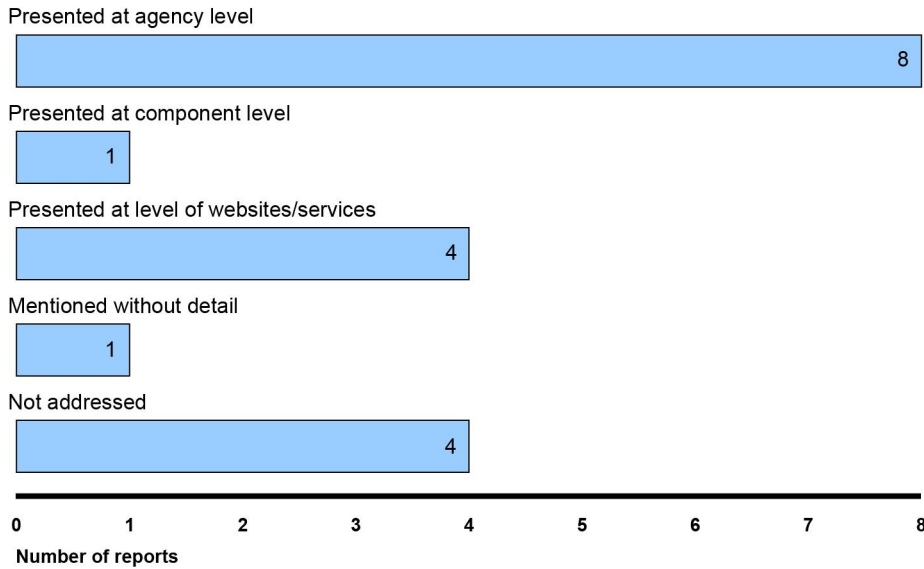
⁵Unencrypted HTTP connections create a privacy vulnerability and expose potentially sensitive information about users of unencrypted federal websites and services. Data sent over HTTP is susceptible to interception, manipulation, and impersonation. This data can include browser identity, website content, search terms, and other user-submitted information.

⁶HSTS is a widely supported standard to protect website visitors by ensuring that their browsers always connect to a website over HTTPS. HSTS exists to remove the need for the common, insecure practice of redirecting users from http:// to https:// URLs.

⁷A CDN is a geographically distributed set of web servers that retain a copy of web content the first time it is accessed and delivers this copy to subsequent requests based on a pre-established set of caching rules. This allows content to be staged on CDN servers that may be geographically closer to consumers—speeding delivery—and also reduces the number of requests needing to be served by the platform hosting the website.

Figure 8: Level of Agency Discussion for the User Data-Driven Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the User Data-Driven Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 8: Level of Agency Discussion for the User Data-Driven Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	8
Presented at component level	1
Presented at level of websites/services	4
Mentioned w/o detail	1
Not addressed	4

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

The Department of Housing and Urban Development (HUD) was one of the agencies that discussed progress against the User data-driven requirement at the agency-wide level in its 2023 annual report. Specifically, HUD stated that it was redesigning website content around the needs of its customers by researching their needs, designing prototypes based on analytical data, and ensuring customers can easily find and accomplish tasks. HUD further stated that the www.hud.gov homepage was redesigned based on analytics and highlights top user tasks. The department stated that it was also redesigning program office homepages with the same philosophy.

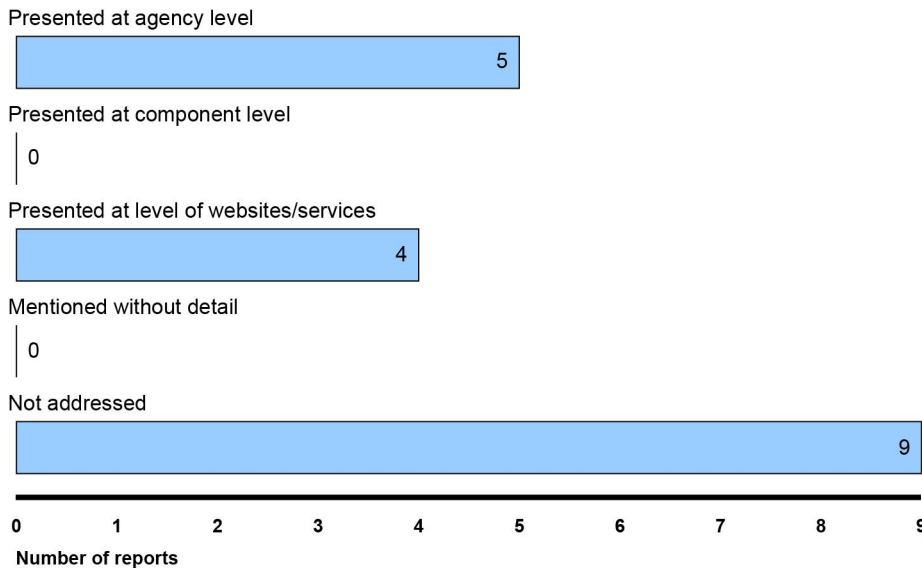
Requirement 7: Customizable

Of the 18 submitted annual 21st Century IDEA reports for 2023, five reported progress made related to the Customizable requirement at the agency-wide level. Of the remaining 13 reports, four presented progress at the level of websites or services and nine did not address the requirement. No agencies discussed progress at

the component level for this requirement. In addition, no agencies mentioned progress without including additional detail. The breakdown of the level of discussion is illustrated in figure 9.

Figure 9: Level of Agency Discussion for the Customizable Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the Customizable Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 9: Level of Agency Discussion for the Customizable Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	5
Presented at component level	0
Presented at level of websites/services	4
Mentioned w/o detail	0
Not addressed	9

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

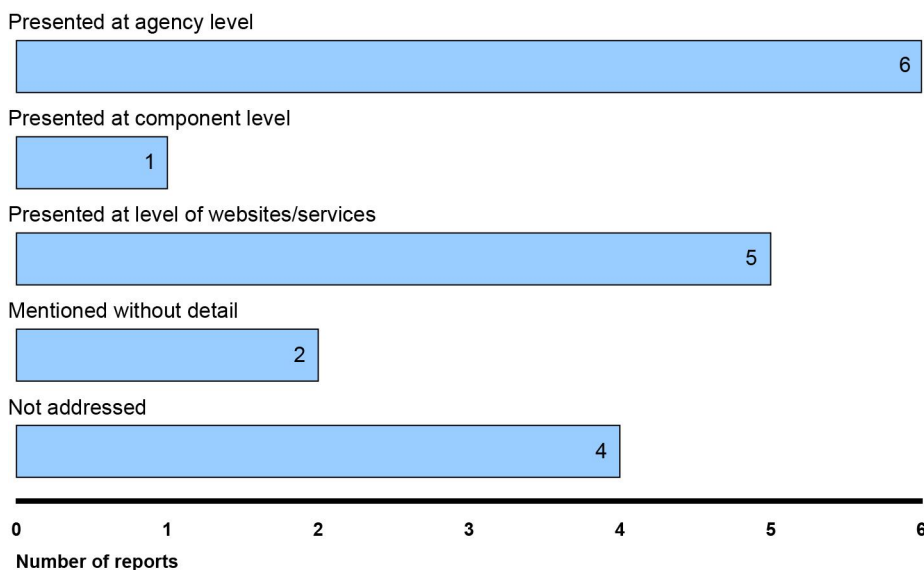
The Department of Energy was one of the agencies that discussed progress against the Customizable requirement at the agency-wide level in its 2023 annual report. Specifically, Energy reported that its modernized websites leveraged user authentication for internal and external users. It further stated that user authentication, among other things, enabled the department to direct relevant, interactive media to the appropriate audience. As for specific sites, Energy reported that web-based forms on My.Energy.gov required user authentication and that its sites used ID.me and Login.gov for authentication of external users. For internal users, Energy reported that it used its single sign-on solution to access a web-based forms environment.

Requirement 8: Mobile-friendly

Of the 18 submitted annual 21st Century IDEA reports for 2023, six reported progress made related to the Mobile-friendly requirement at the agency-wide level. Of the remaining 12 reports, one presented progress at the component level, five presented progress at the level of websites or services, two mentioned progress without providing significant detail, and four did not address the requirement. The breakdown of the level of discussion is illustrated in figure 10.

Figure 10: Level of Agency Discussion for the Mobile-Friendly Requirement across the 18 Submitted 2023 Annual Reports

Agencies' 2023 Reporting on the Mobile-Friendly Requirement



Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

Accessible Data for Figure 10: Level of Agency Discussion for the Mobile-Friendly Requirement across the 18 Submitted 2023 Annual Reports

Category	Number of reports
Presented at agency level	6
Presented at component level	1
Presented at level of websites/services	5
Mentioned w/o detail	2
Not addressed	4

Source: GAO analysis of agencies' 21st Century Integrated Digital Experience Act reports. | GAO-24-106764

EPA was one of the agencies that discussed progress against the Mobile-friendly requirement at the agency-wide level in its 2023 annual report. EPA listed a number of initiatives related to ensuring compliance with this requirement. These initiatives included EPA's Mobile Application Development Strategy, which provided guidance on mobile app development and outlined various app development options. Further, EPA reported that its standard website template provided a responsive design so that its web content could be displayed on

a variety of devices and window or screen sizes. EPA also stated that it had guidance describing the look and feel requirements for mobile hybrid and native mobile applications.

Appendix III: Comments from the Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON

September 12, 2024

Ms. Carol C. Harris
Director
Information Technology and Cybersecurity Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Harris:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: **Digital Experience: Agency Compliance with Statutory Requirements** (GAO-24-106764).

VA has completed drafting the 2023 Annual 21st Century Integrated Digital Experience Act report. The report is currently undergoing review and approval prior to final submission to the Office of Management and Budget, and VA will make it publicly available upon approval. VA appreciates the opportunity to comment on your draft report.

Sincerely,

A handwritten signature in black ink that reads "Margaret B. Kabat".

Margaret B. Kabat, LCSW-C, CCM
Chief of Staff

Enclosure

Accessible Text for Appendix III: Comments from the Department of Veterans Affairs

Ms. Carol C. Harris
Director
Information Technology and Cybersecurity Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Harris:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: Digital Experience: Agency Compliance with Statutory Requirements (GAO-24-106764).

VA has completed drafting the 2023 Annual 21st Century Integrated Digital Experience Act report. The report is currently undergoing review and approval prior to final submission to the Office of Management and Budget, and VA will make it publicly available upon approval. VA appreciates the opportunity to comment on your draft report.

Sincerely,

Margaret B. Kabat, LCSW-C, CCM
Chief of Staff

Enclosure

Appendix IV: Comments from the United States Agency for International Development



Ms. Carol C. Harris
Director
Information Technology Acquisition Management Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20226

September 12, 2024

Re: Digital Experience: Agency Compliance with Statutory Requirements (GAO 24-106764)

Dear Ms. Harris:

I am pleased to provide the response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, "Digital Experience: Agency Compliance with Statutory Requirements." The report does not contain any recommendations for action on behalf of USAID.

USAID remains committed to the goals of the *21st Century Integrated Digital Experience Act (21st Century IDEA)*, namely that federal websites and digital services should be accessible, consistent, not duplicative, searchable, encrypted, user data-driven, customizable, and mobile-friendly. The Agency will continue to comply with these requirements and also commits to pursuing these goals beyond compliance and to providing the best possible user experience for its digital services.

Thank you for the opportunity to respond to the draft report and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of our Digital Experience Management.

Sincerely,

Colleen R. Allen

Colleen Allen
Assistant Administrator
Bureau for Management

Enclosure: a/s

Accessible Text for Appendix IV: Comments from the United States Agency for International Development

September 12, 2024

Ms. Carol C. Harris
Director
Information Technology Acquisition Management Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20226

Re: Digital Experience: Agency Compliance with Statutory Requirements (GAO 24-106764)

Dear Ms. Harris:

I am pleased to provide the response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, "Digital Experience: Agency Compliance with Statutory Requirements." The report does not contain any recommendations for action on behalf of USAID.

USAID remains committed to the goals of the 21st Century Integrated Digital Experience Act (21st Century IDEA), namely that federal websites and digital services should be accessible, consistent, not duplicative, searchable, encrypted, user data-driven, customizable, and mobile-friendly. The Agency will continue to comply with these requirements and also commits to pursuing these goals beyond compliance and to providing the best possible user experience for its digital services.

Thank you for the opportunity to respond to the draft report and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of our Digital Experience Management.

Sincerely,

Colleen Allen
Assistant Administrator
Bureau for Management

Enclosure: a/s

Appendix V: Comments from the Social Security Administration



SOCIAL SECURITY
Office of the Commissioner

September 12, 2024

Carol Harris
Director, Information Technology and Cybersecurity
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Director Harris,

Thank you for the opportunity to review the draft report "DIGITAL EXPERIENCE: Agency Compliance with Statutory Requirements" (GAO-24-106764). We have no comments.

Please contact me at (410) 965-2611 if I can be of further assistance. Your staff may contact Hank Amato, Director of the Audit Liaison Staff, at (407) 765-9774.

Sincerely,

A handwritten signature in black ink, appearing to read "Dustin S. Brown".

Dustin S. Brown
Acting Chief of Staff

Accessible Text for Appendix V: Comments from the Social Security Administration

September 12, 2024

Carol Harris
Director, Information Technology and Cybersecurity
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Director Harris,

Thank you for the opportunity to review the draft report "DIGITAL EXPERIENCE: Agency Compliance with Statutory Requirements" (GAO-24-106764). We have no comments.

Please contact me at (410) 965-2611 if I can be of further assistance. Your staff may contact Hank Amato, Director of the Audit Liaison Staff, at (407) 765-9774.

Dustin S. Brown
Acting Chief of Staff

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

Carol C. Harris (202) 512-4456 or harriscc@gao.gov

Staff Acknowledgments

In addition to the contact named above, the following staff made key contributions to this report: Jennifer Stavros-Turner (Assistant Director), Meredith Raymond (Analyst-in-Charge), Christopher Businsky, James Connor, Rebecca Eyer, Irene Li, Jacqueline Mai, Scott Pettis, Rachael Scott, and Walter Vance.

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