Operating efficiently and effectively

EPA Established a Web Management Program, but Improvements Are Needed in Deploying Web Analytics

Report No. 22-P-0013   **December 20, 2021**
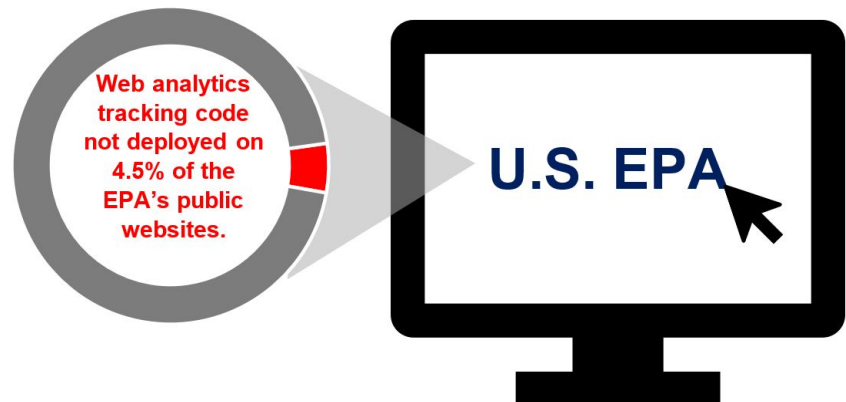
Web analytics tracking code not deployed on 4.5% of the EPA's public websites.

U.S. EPA

Abbreviations:	DAP	Digital Analytics Program
	EPA	U.S. Environmental Protection Agency
	GSA	U.S. General Services Administration
	OIG	Office of Inspector General
	Pub. L.	Public Law
	U.S.C.	United States Code

Key Definitions:	Public Website	Web content made available by an agency to the general public.
	Digital Service	Provides information, data, and content across a variety of applications such as websites, social media, and mobile apps.
	Broken Link	A link on a webpage to another web source that is no longer available on the internet.

| **Cover Image:** | | Percentage of the EPA's public websites without the required web analytics tracking code. (EPA OIG image) |

EPA Established a Web Management Program, but Improvements Are Needed in Deploying Web Analytics

What We Found

The EPA has established a program to manage its public websites and digital services in accordance with federal laws and policies outlined in Office of Management and Budget M-17-06. The EPA has developed a digital strategy, governance structure, Web Council, and policy, as well as procedures and standards, but it has not deployed the required web analytics tracking code for 14 of the 308 public websites that provide essential environmental information to communities. The required code captures website traffic data, such as the number of visitors, the type of web browser used, the length of time visitors remain on each webpage, the documents downloaded from a webpage, and the visitors' locations.

> **Without fully implementing web analytics, the EPA could be without vital usage information to meet the needs of the public, regulatory agencies, industries, and other stakeholders when conveying environmental issues.**

This occurred because the EPA has not (1) identified a responsible office for maintaining an accurate listing of all EPA public websites and (2) established a process to validate that program offices and regions have deployed the required tracking code on all EPA public websites.

Office of Management and Budget Memorandum M-17-06 and Agency web analytics procedures require deploying a federally required tracking code on all public websites. The lack of web analytics on the EPA's public websites could result in the loss of valuable web traffic metrics necessary to improve the communication of vital EPA environmental data to the public.

Recommendations and Planned Agency Corrective Actions

We recommend that the assistant administrator for Mission Support (1) identify a single responsible office to create and maintain a list of all the EPA's public websites and (2) develop and implement a process, including identifying a responsible office, to periodically validate that the required tracking code is deployed on all public websites.

The EPA agreed with Recommendation 1 and provided alternative language for Recommendation 2. We agreed with the Agency's suggestion and updated Recommendation 2. We consider these recommendations resolved.

Noteworthy Achievement

During the audit, we identified broken links in six of the ten websites we reviewed. We notified the Agency of these issues, and Agency personnel indicated that actions were taken to fix the broken links. We revisited the websites and verified that the Agency fixed the links.

December 20, 2021

MEMORANDUM

SUBJECT: EPA Established a Web Management Program, but Improvements Are Needed in
Deploying Web Analytics
Report No. 22-P-0013

FROM: Sean W. O'Donnell

TO: Lynnann Hitchens, Acting Principal Deputy Assistant Administrator
Office of Mission Support

This is our report on the subject evaluation conducted by the Office of Inspector General of the
U.S. Environmental Protection Agency. The project number for this evaluation was OA-FY21-0015. This
report contains findings that describe the problems the OIG has identified and corrective actions the OIG
recommends. Final determinations on matters in this report will be made by EPA managers in accordance
with established audit resolution procedures.

The Office of Mission Support is responsible for the issues described in the report.

In accordance with EPA Manual 2750, your office provided acceptable planned corrective actions and
estimated milestone dates in response to OIG recommendations. All recommendations are resolved, and
no final response to this report is required. If you submit a response, however, it will be posted on the
OIG's website, along with our memorandum commenting on your response. Your response should be
provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the
Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want
to be released to the public; if your response contains such data, you should identify the data for redaction
or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

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Appendixes

Purpose

The U.S. Environmental Protection Agency's Office of Inspector General initiated this audit to determine whether the EPA's public websites and digital services complied with relevant federal laws and policies, as outlined in Office of Management and Budget Memorandum M-17-06, *Policies for Federal Agency Public Websites and Digital Services*.

> **Top Management Challenge Addressed**
>
> This evaluation addresses the following top management challenge for the Agency, as identified in OIG Report No. 22-N-0004, *EPA's Fiscal Year 2022 Top Management Challenges*, issued November 12, 2021:
>
> - Integrating and leading environmental justice, including communicating risks.

Background

The EPA shares environmental information with the public through its 308 public websites and its digital services. The EPA's primary public website is www.epa.gov. It is the EPA's most important channel for sharing environmental and human health information with the public. The EPA also owns and operates other websites that provide specialized information. For example:

> Public websites refer to web content made available by an agency to the general public while digital services provide information, data, and content across a variety of applications, such as websites, social media, and mobile apps.

- *Airnow.gov* provides current health and air quality data at state, national, and world levels to the public, media outlets, and other consumers of environmental data.

- *Epa.gov/superfund* provides content designed to help users find Superfund sites in their areas, understand the clean-up process, and learn about the Superfund program.

- *Mywaterway.epa.gov* provides information on water quality at community, state, and national levels.

The EPA's digital services include social media accounts, such as Facebook, Twitter, Instagram, LinkedIn, and YouTube, and mobile apps, such as the AirNow app, which provides the public with alerts whenever unhealthy air quality is detected in their local community.

The EPA is required to participate in the U.S. General Services Administration Data Analytics Program, or GSA DAP, and deploy the DAP tracking code on all public Agency websites. The GSA DAP tracking code collects and analyzes web traffic data, such as the number of website visitors, the type of web browser visitors use, the length of time visitors remain on each webpage, the documents that visitors download from the webpage, and the visitors' locations.

Responsible Offices

The Office of Public Affairs, within the Office of the Administrator, and the Office of Information Management, within the Office of Mission Support, share responsibility for governance and management of the EPA's public websites. As cochairs of the EPA's Web and Intranet Councils, the

Office of Public Affairs and the Office of Information Management lead the development of procedures, standards, and guidance, in collaboration with other appropriate entities, for the EPA's web presence. The Office of Public Affairs and the Office of Information Management comanage the web content and infrastructure for the EPA's primary public website.

The assistant and regional administrators are responsible for maintaining their respective office's websites in accordance with the EPA's web governance directives.

The External Civil Rights Compliance Office, within the Office of General Counsel, ensures compliance with Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*. The External Civil Rights Compliance Office administers the contract for translation, in-person interpretation, and telephonic interpretation services of environmental information available for all EPA regional and program offices. The implementation of these services better enables communication with individuals throughout the United States and its territories who have limited English proficiency.

Noteworthy Achievement

During the audit, we identified broken links in six of the ten websites we reviewed. We notified the Agency of these issues, and Agency personnel indicated that actions were taken to fix the broken links. We revisited the websites and verified that the Agency fixed the links.

> A broken link is a link on a webpage to another web source that no longer exists on the internet.

Scope and Methodology

We conducted this performance audit from November 2020 through August 2021 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We assessed the internal controls necessary to satisfy our audit objective.[1] In particular, we assessed the internal control components—as outlined in the U.S. Government Accountability Office's Green Book—significant to our audit objective. Any internal control deficiencies we found are discussed in this report. Table 1 outlines the five internal control components that federal agencies must follow.

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[1] An entity designs, implements, and operates internal controls to achieve its objectives related to operations, reporting, and compliance. The U.S. Government Accountability Office sets internal control standards for federal entities in GAO-14-704G, *Standards for Internal Control in the Federal Government* (also known as the "Green Book"), issued September 10, 2014.

Table 1: Five components of internal control for federal government

Control environment	This is the foundation for an internal control system. Management should establish a control environment that demonstrates a commitment to integrity and ethical values. The control environment provides the discipline and structure to help an agency achieve its objectives.
Risk assessment	Managers assess risks facing the agency as it seeks to execute its programs and achieve its objectives. This assessment is the foundation for developing appropriate risk responses.
Control activities	After assessing the risk, the control activities are the actions management establishes through policies and procedures to achieve objectives and respond to risks.
Information and communication	Management should use and internally and externally communicate quality information to achieve the agency's objectives.
Monitoring	Management should establish and implement activities to monitor agency performance, evaluate results, and promptly resolve identified deficiencies.

Source: The Green Book. (EPA OIG table)

To gain an understanding of public website and digital services requirements, we reviewed the following documentation:

- 21st Century Integrated Digital Experience Act, Pub. L. 115-336, dated December 20, 2018, requires that federal agencies submit to Congress a list of websites and digital services that are the most viewed or used by the public or are otherwise important for public engagement.

- Office of Management and Budget Memorandum M-17-06, *Policies for Federal Agency Public Websites and Digital Services*, states that "All agencies must participate in the General Services Administration's (GSA) Digital Analytics Program (DAP) and deploy the DAP tracking code on all public facing agency websites." The DAP provides agencies with free quantitative analytics on website management.

- Executive Order 13166 requires federal agencies to examine the services they provide and to develop and implement a system to provide those services so that individuals with limited English proficiency can have meaningful access to these services.

- EPA Directive No. CIO 2180.2, *Web Governance and Management Policy*, states that the Offices of Public Affairs and Mission Support are responsible for the development of procedures, standards, and guidance for EPA web presence.

- EPA procedure *Maintaining the Agency Web Analytics Code on all Public HTML Pages*, which states that:

  > EPA content owners, such as Editors in Chief … and Web application owners, are responsible for ensuring that all Web content under their purview and responsibility includes the agency Web analytics code at all times. Ultimate responsibility for compliance with this procedure rests with the Senior Information Officer … of each program office, with Web Council representatives serving as liaisons in ensuring this procedure is disseminated to all EPA content owners.

We also performed the following activities for this audit:

- Verified whether the EPA developed and posted its *Digital Strategy* on its public page and documented the Agency's digital governance structure as required by Office of Management and Budget Memorandum M-17-06.

- Interviewed Office of Mission Support representatives to discuss the status of the EPA's *Digital Strategy*.

- Interviewed Office of Public Affairs and Office of Information Management representatives to learn about the EPA's web governance and management policies and procedures.

- Interviewed External Civil Rights Compliance Office representatives to determine whether the EPA has developed policy and procedures to comply with Executive Order 13166, *Improving Access to Services for People with Limited English Proficiency.*

- Selected websites to review based on the highest volume of visits according to the GSA DAP as of January 13, 2021 (Table 2).

Table 2: Ten EPA websites reviewed

Website	Responsible office or region	Web content
airnow.gov	Office of Air and Radiation	Air quality data
comptox.epa.gov	Office of Research and Development	Chemical data
cumulis.epa.gov/ supercpad/	Office of Land and Emergency Management	Information on Superfund sites
echo.epa.gov	Office of Enforcement and Compliance Assurance	Compliance with environmental regulations
enviroflash.info	Office of Air and Radiation	Air quality information
epa.gov	Office of the Administrator and the Office of Mission Support	Agency's primary public website
frtr.gov	Office of Land and Emergency Management	Federal agencies involved in hazardous waste site cleanup
hero.epa.gov	Office of Research and Development	Scientific research database
mywaterway.epa.gov	Office of Water	Water quality information
northeastdiesel.org	Region 1	Diesel emissions information in northeastern states, Puerto Rico, and the U.S. Virgin Islands

Source: OIG analysis of EPA websites. (EPA OIG table)

- Reviewed the selected websites to determine whether they were:

  o Accessible using different web browsers, such as Internet Explorer, Chrome, Firefox, and Safari.

  o Accessible using different devices, such as laptops and smartphones.

  o Configured with a search function that allowed the visitor to easily search and discover information on that website.

    o Developed in compliance with federal and Agency web content writing standards.

    o Designed to include an option to translate the web content to different languages.

- Interviewed EPA personnel responsible for the websites we reviewed and reviewed documentation provided to determine whether the respective offices were:

    o Using analytics to understand customer needs.

    o Collecting and assessing customer feedback.

    o Using performance measures to assess data quality.

- Analyzed the EPA's 308 public websites to determine whether the EPA had deployed the required web analytics code.

Results

The EPA established a program to manage its public websites and digital services in accordance with federal laws and policies outlined in Office of Management and Budget M-17-06. The EPA has developed a digital strategy, governance structure, Web Council, and policy, as well as procedures and standards. The Agency has a program to translate web documents to members of the public with limited English proficiency and has made available a list of websites and digital services that are most viewed or utilized by the public. We found that the EPA public websites we reviewed:

- Were accessible to the public on multiple devices, such as laptops and smartphones, and through multiple web browsers, such as Google Chrome, Mozilla Firefox, Microsoft Edge, Microsoft Internet Explorer, and Apple Safari.

- Complied with the EPA's web standard, *Writing for the Web*.

- Were designed to translate the web content into different languages.

However, the EPA needs to improve its efforts in deploying the required web analytics tracking code. Our analysis shows that the EPA has not deployed the required web analytics tracking code on 14 of 308 public websites that it reported as public and that provide essential environmental information to the communities they serve. While the Office of Management and Budget and the EPA have established requirements for public websites, the EPA did not ensure that these requirements were implemented. Without fully implementing web analytics, the EPA could be without vital usage information to meet the needs of the public, regulatory agencies, industries, and other stakeholders when conveying environmental issues and information.

EPA Lacks a Strategy to Validate Public Websites Are Compliant with Federal Web Analytics Requirements

Office of Management and Budget Memorandum M-17-06 requires all agencies to participate in the GSA DAP and deploy the DAP tracking code on all public agency websites. The GSA DAP program provides free quantitative analyses on web traffic for agencies to use to improve user experience and web management.

The EPA has not deployed the required DAP tracking code on 14 (4.5 percent) of the 308 public websites reported in the *Environmental Protection Agency (EPA), Public Law 115-336, "21st Century Integrated Digital Experience Act"* report, dated December 2020. The tracking code provides useful information on each visitor's needs and behaviors—such as the length of time a visitor stays on a webpage and the documents a visitor downloads from the webpage—that website owners can use to improve the website's form and content to further the visitor's experience. This oversight occurred because the Office of Mission Support has not (1) identified a responsible office for maintaining an accurate listing of all EPA public websites and (2) established a process to validate that program offices and regions have deployed the required GSA DAP code on all EPA public websites. Table 3 lists the 14 websites without the GSA DAP tracking code.

Table 3: EPA public websites that did not include the required GSA DAP tracking code*

Number	Website
1	20watersheds.epa.gov
2	actor.epa.gov
3	actorws.epa.gov
4	cdx.epa.gov
5	cpardpub.epa.gov
6	dwinsprod.rtnccad.epa.gov
7	foiaonline.gov
8	geodata.epa.gov
9	ghgreporting.epa.gov
10	gispub6.epa.gov
11	his.ord.epa.gov
12	hisprod.rtnccad.epa.gov
13	vsat.epa.gov
14	wq-srs.epa.gov

Source: OIG analysis of EPA websites. (EPA OIG table)

*These websites were active at the time of the audit.

These websites provide essential environmental information to promote a healthier environment and protect human health in areas such as:

- Physical security monitoring—Provides an assessment of physical monitoring capabilities available to drinking water utilities to identify security breaches.

- Water contamination response—Provides an assessment of response capabilities available to drinking water utilities to respond to possible drinking water contamination.

- Public health surveillance—Provides an assessment of public health capabilities available to drinking water utilities to identify unusual occurrence of illness that might be due to contaminated drinking water.

- Watershed quality—Provides simulations to assess the sensitivity of streamflow and water quality to potential climate change and development scenarios in 20 watersheds in the United States.

- [Drinking water and wastewater systems](#)—Provides community water systems with a vulnerability assessment tool to estimate risks from malevolent threats and natural hazards and to evaluate improvements to increase security and resilience.

The lack of web analytics on the EPA's public websites could result in the loss of the valuable web traffic metrics necessary to improve the communication of EPA environmental data to the public. This public information sharing is crucial in supporting the EPA's mission of protecting human health and the environment.

Conclusions

Further actions are needed for the EPA to be in full compliance with federal and Agency directives on deploying the required web analytics code on all of the EPA's public websites. Without fully implementing the web analytics code, the EPA forgoes the opportunity to capture valuable web traffic metrics that can be used to improve the communication of vital environmental data to meet the needs of the public, regulatory agencies, industries, and other stakeholders.

Recommendations

We recommend that the assistant administrator for Mission Support:

1. Identify a single responsible office to create and maintain a list of all of the EPA's public websites.

2. Develop and implement a process, including identifying a responsible office, to periodically validate that the required General Services Administration Data Analytics Program tracking code is deployed on all public websites.

Agency Response and OIG Assessment

The Agency provided a response to the draft report on October 15, 2021 (Appendix A). The Office of Mission Support concurred with Recommendation 1 and provided acceptable planned corrective actions with an estimated completion date. We consider this recommendation resolved with corrective actions pending.

The Office of Mission Support did not fully concur with our draft report Recommendation 2, which stated that the EPA's senior information officers should periodically validate that the EPA's public websites have the website tracking code. The Office of Mission support responded that it did not believe requiring senior information officers to periodically validate website tracking codes would be efficient. Instead, the Office of Mission Support provided the following alternative language: "Develop and implement a process to periodically validate that the required General Services Administration Data Analytics Program tracking code is deployed on all public websites." It also provided a corrective action plan and estimated completion date of December 31, 2021, for the alternative language.

We met with the Office of Mission Support's staff and managers on October 28, 2021, to discuss Recommendation 2. We agreed with the alternative language, as the proposed corrective action plan meets the recommendation's intent to validate that all public websites have the required tracking code.

However, we reemphasized the need to identify a responsible office for implementing Recommendation 2 and have included this clarification in our final Recommendation 2. The Agency agreed with this clarification in writing. We consider this recommendation resolved with corrective actions pending.

The Agency also provided technical comments to the draft report. We verified the Agency's comments and updated the report where appropriate.

Status of Recommendations

RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status¹	Action Official	Planned Completion Date
1	7	Identify a single responsible office to create and maintain a list of all of the EPA's public websites.	R	Assistant Administrator for Mission Support	12/31/21
2	7	Develop and implement a process, including identifying a responsible office, to periodically validate that the required General Services Administration Data Analytics Program tracking code is deployed on all public websites.	R	Assistant Administrator for Mission Support	12/31/21

¹ C = Corrective action completed.
  R = Recommendation resolved with corrective action pending.
  U = Recommendation unresolved with resolution efforts in progress.

Agency Response to Draft Report

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

October 15, 2021

OFFICE OF MISSION SUPPORT

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report "Audit of EPA's
Compliance with Federal Requirements to Making Information Accessible
Through Its Public Websites and Digital Services" Project No. OA-FY21-0015
dated September 15, 2021

FROM: Vaughn Noga, Chief Information Officer and Deputy Assistant Administrator for
Environmental Information
Noga, Vaughn

Digitally signed by Noga, Vaughn
Date: 2021.10.15 07:55:26 -04'00'

TO: LaSharn Barnes, Director
Information Resources Management Directorate
Office of Audit, Office of Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject
auditreport. Following is a summary of the agency's overall position, along with its position
on each of the report recommendations. For the report recommendation with which the
agency agrees, we have provided high-level intended corrective action and an estimated
completion date. For the report finding with which the agency does not agree, we have
explained our position and proposed an alternative. For your consideration, we have attached
technical comments to supplement this response.

AGENCY'S OVERALL POSITION

The Office of Mission Support (OMS) concurs with recommendation #1 in the Office of
Inspector General's (OIG) draft report. OMS does not fully concur with recommendation #2.
Wehave proposed an alternative approach to address it. Additionally, there are findings in the
draft report that we disagree with. Our disagreements are outlined in the attached technical
comments.

OMS RESPONSE TO REPORT RECOMMENDATIONS

Agreements

No.	Recommendation	High-Level Intended Corrective Actions	Estimated Completion
1	Identify a single responsible office to create and maintain a list of all of the EPA's public websites.	Identify a single responsible office to create and maintain a list of all of the EPA's public websites.	December 31, 2021

Disagreements

No.	Recommendation	Agency Explanation/Response	Proposed Alternative
2	Develop and implement a process for the EPA's senior information officers to periodically validate that the required General Services Administration Data Analytics Program tracking code is deployed on all public websites.	We believe this process can be reviewed/validated by the established web council. Requiring the senior information officers to periodically validate would be a "check the box" exercise making it inefficient and not meaningful.	Develop and implement a process to periodically validate that the required General Services Administration Data Analytics Program tracking code is deployed on all public websites. Proposed Completion Date: December 31, 2021

If you have any questions regarding this response, please contact Marilyn Armstrong, Audit Follow-up Coordinator, of the Office of Resources and Business Operations, (202) 564–1876 orarmstrong.marilyn@epa.gov.

Attachment:
Technical Comments

Cc: Vincent Campbell
        Nancy Dao
        Shaheryar Qureshi
        Gina Ross
        Scott Sammons
        Erin Collard
        Austin Henderson
        David Alvarado
        Jennie Campbell
        Lin Darlington
        Chuck Widener
        Michael Benton
        Karen Maher
        Angela Shogren

Susan Fagan
Dan Coogan
Jan Jablonski
Monisha Harris
Marilyn Armstrong
Andrew LeBlanc
Jose Kercado

Attachment 1: Technical Comments

The agency agrees with the report finding that "the Agency has not deployed the required webanalytics tracking code… [to all] …public websites that provide essential environmental information to the communities they serve.

However, we disagree with the following statements:

1. In the green box on page 3: "*The lack of web analytics on EPA's public websites couldaffect the availability and conveyance of environmental information to the public.*"

   We disagree, the lack of web analytics may make it difficult for the agency to obtain website customer usage data and performance statistics, but it will in no way affect theavailability of the site, or our ability to post information for the public.

2. Some of the data is now outdated. The finding states: "*The EPA has not deployed the required GSA web analytics tracking code on 20 (6.5 percent) out of 308 total public websites reported in the Environmental Protection Agency (EPA), Public Law 115-336,"21st Century Integrated Digital Experience Act" report, dated December 2020.*"

   We disagree, at the time this audit response was drafted (9/24), 7 of the 20 sites listed asnot having the required GSA web analytics code are no longer available to the public. Amore accurate statement would be: "*The EPA has not deployed the required GSA web analytics tracking code on 13 (4.2 percent) out of 308 total public websites reported in the Environmental Protection Agency (EPA), Public Law 115-336, "21st Century Integrated Digital Experience Act" report, dated December 2020.*"

The sites listed below are cited in the report as not having the required GSA web analytics tracking code, however, the sites in red strikethrough text were not available to the public as of 9/24/21. This supports the agency's assertion that 4.2 (not 6.5) percent of the sites listed in EPA's "21st Century Integrated Digital Experience Act" report, dated December 2020, are out ofcompliance with the requirement to deploy GSA digital analytics tracking code on all public sites.

Number	Website
1	20watersheds.epa.gov
2	actor.epa.gov
3	actorws.epa.gov
4	cdx.epa.gov
5	~~epardpub.epa.gov~~
6	~~developer.epa.gov~~ (redirects to www.epa.gov/developers)
7	dwinsprod.rtnccad.epa.gov
8	foiaonline.gov
9	geodata.epa.gov
10	ghgreporting.epa.gov

11	gispub6.epa.gov
12	~~www.gispub9.epa.gov~~
13	his.ord.epa.gov
14	hisprod.rtnccad.epa.gov
15	~~pexipdcdmz1.video.epa.gov~~
16	~~pexip-dc-dmz2.video.epa.gov~~
17	~~pexip-rtp-dmz1.video.epa.gov~~
18	~~pexip-rtp dmz2.video.epa.gov~~
19	vsat.epa.gov
20	zq-srs.epa.gov

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