



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
THE DEPUTY SECRETARY  
WASHINGTON, D.C. 20410-0050

AUG 13 2001

Ms. Brooke Dickson  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Eisenhower Executive Office Building  
17<sup>th</sup> Street and Pennsylvania Avenue N.W.  
Washington, DC 20503

Dear Ms. Dickson:

In response to the proposed guidelines found in the Federal Register, June 28, 2001 (Volume 66, Number 125), HUD offers the following comments on the specific questions raised:

1. Federal agencies disseminate many types of information for many types of programs and functions. Should the OMB guidelines devote particular attention to specific types of information or information dissemination products? If so, please identify the areas where specific focus should be directed, explain why the focus is needed or is desirable, and describe any guidelines that you recommend for those areas.

While agencies should provide as much information via the web as possible, we would prefer the Office of Management and Budget (OMB) to allow agencies discretion in how information is presented so that they can focus on being responsive to the information needs of the general public.

We recommend that OMB encourage agencies to use web-based tools that help deliver services and information to citizens online in ways that can be customized, by ZIP code, for example. We suggest that OMB not prescribe which products an agency would have to use.

We agree that agencies should stand behind the quality and accuracy of the information they provide by issuing internal guidelines, policies, and procedures. Feedback mechanisms should be in place through agency websites to accept user concerns about information quality.

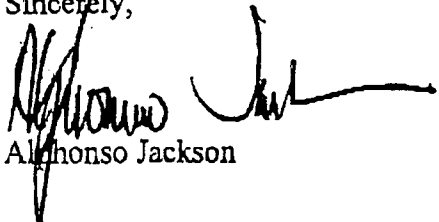
Monitoring and reporting on the number and nature of complaints about information quality seems burdensome, especially to agencies that receive thousands of e-mails each month, some of which contain complaints of varying degrees of seriousness. If a formal report to OMB is required, it would be beneficial to have clear guidelines on the type and seriousness of complaints to be reported.

**2. Should OMB develop specific guidelines to address information that Federal agencies disseminate from a web page? Is there any need to adapt these guidelines to the agency use of a web page? If so, what guidelines are needed?**

We would urge OMB to include in its guidelines that citizens should be considered a primary audience for federal websites. Agencies should have the latitude to determine the most appropriate methods for implementing the guidelines. For example, OMB currently requires that grant information be presented in one area of the agency's website. Citizens and OMB would be served better if guidelines required that information be presented in an understandable format. Other existing guidelines, such as those for privacy and accessibility, could be improved with a better focus on user needs.

We recommend that OMB consider not requiring agencies to translate their websites into other languages, as it can be costly, especially if translated into multiple languages. This is another area in which we recommend agency discretion in determining the most appropriate means of achieving the guideline objectives.

Sincerely,

  
Alphonso Jackson