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[FAC Support] [GSA-Digital] new guidance on website warning banners

1 message

Rachel Flagg - O <rachel.flagg@gsa.gov> Wed, May 22, 2024 at 10:07 AM
To: GSA Digital CoP <GSADigitalCoP@gsa.gov>

Dear GSA web teams,

GSA has published updated guidance on how to display system use notifications on GSA websites, systems, and applications.

In September 2023, OMB issued M-23-22 Delivering a Digital-First Public Experience which provides guidance to help agencies fully implement 21st Century IDEA. That guidance, in part, advises agencies on how to handle system use notifications.

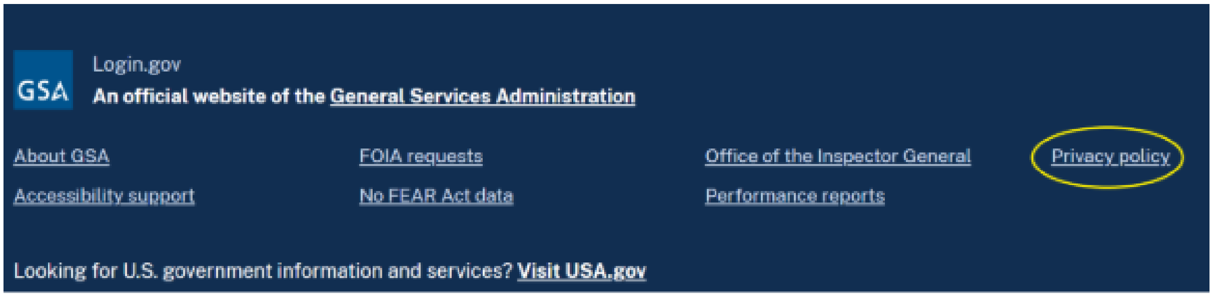
GSA's Office of the Chief Information Security Officer (OCISO) has updated our security policies to be consistent with the new guidance in M-23-22:

- GSA Information Technology (IT) Security Policy (CIO 2100.1P), page 60, was updated to **remove any requirement for a warning banner for publicly accessible websites, systems, and applications**. Moving forward, only internal GSA IT systems used exclusively by GSA employees/contractors must display an approved warning banner.

- IT Security Procedural Guide: Access Control (AC) CIO-IT Security-01-07 (Revision 6), pages 16-18, was updated to align with M-23-22.

Based on M-23-22 and GSA's updated security guidance, we recommend that:

1. For websites, systems, and applications where **users do NOT register/log-in** – rather than actively presenting a system use notifications / warning banner to users, link to GSA.gov's Privacy and Security policies. GSA websites that leverage the U.S. Web Design System identifier component already satisfy this recommendation, as shown below. **No additional System Use Notification is required.**



GSA Login.gov
An official website of the General Services Administration

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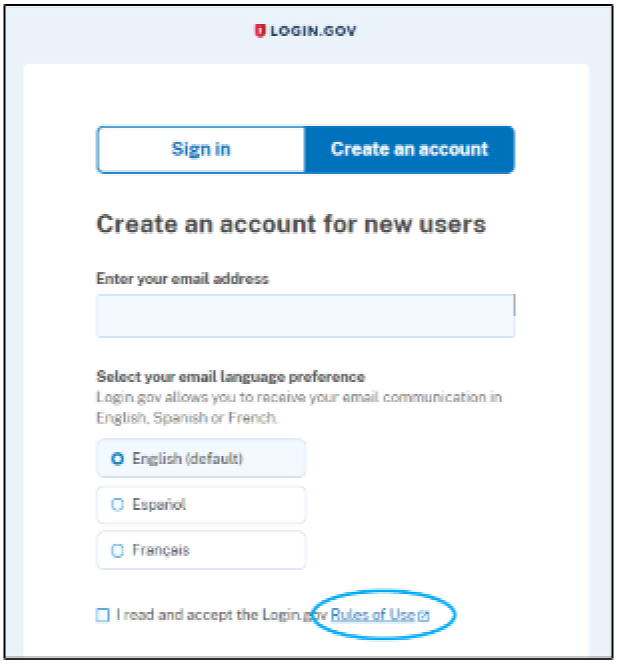
2. For websites, systems, and applications where **users DO register/log-in** – display system use language with the terms and conditions the user must agree to. The example below from Login.gov presents the Rules of Use at account creation. This method satisfies the acknowledgements required from users that the system they're using will be subject to monitoring, and that they recognize they'll be accessing a federal government system every subsequent time they log in.



Create an account for new users

Enter your email address

Select your email language preference

Login.gov allows you to receive your email communication in English, Spanish or French.

● English (default)

○ Español

○ Français

□ I read and accept the Login.gov Rules of Use

Please work with your ISSO / ISSM to comply with all security requirements. If needed, add this task to your backlog as soon as you can, to ensure your websites, systems, and applications meet this new guidance.

Finally, a huge thank you to the Digital Council’s Design/UX working group for kicking off this work, and to the Service Delivery team for wrapping it up!

Thanks!
-Rachel

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