



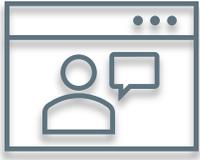
ASSESSMENT OF THE KEY E-PARTICIPATION PLATFORMS

hartak.am | e-draft.am | e-request.am

ASSESSMENT REPORT 2026

Yerevan | 2026

Freedom of Information Center



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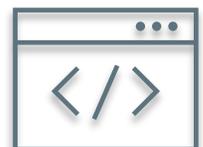
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ASSESSMENT REPORT 2026

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INTRODUCTION

Digital Transformation in Armenia

Official digital platforms for service delivery are an integral part of Armenia's digital governance ecosystem, serving as primary tools for modernizing public administration and delivering "citizen-centric" services. They constitute fundamental infrastructure for public service delivery, data management, and citizen participation, stemming from the need to make government services more transparent, efficient, and accessible. These platforms save citizens time and resources, foster increased trust in public institutions by making governance processes predictable and accessible, and enable direct engagement between the state and its citizens.

[Digitalization strategy of Armenia](#) for 2021-2025 establishes that the state's objective is to create an efficient, transparent and accountable governance system through the application of digital technologies. The Armenian government's digital transformation strategy focuses on enhancing the country's digital infrastructure, governance and service delivery. Based on this strategy, Armenia's [Digital architecture](#) aims to provide all state bodies and systems with secure, accessible, and convenient digital services for citizens. Simultaneously, a critical challenge of Armenia's digitalization strategy is ensuring continuous monitoring of the usability levels of digital service delivery platforms and implementing measures to enhance them, including ongoing surveillance of usability levels and targeted improvement initiatives.

Armenia has made significant progress in the digitalization of public services, as confirmed by SIGMA's "Public Administration in Armenia 2025" [report](#). Notably, progress in the digital governance sector registers at 54 percent, the highest among all sectors' development rates. However, the SIGMA report also identifies systemic gaps that hinder the effectiveness of digital services and the satisfaction of citizen needs. Specifically, systemic issues include the absence of mechanisms for users to assess service delivery quality, the complexity and poor accessibility of certain digital platforms, which exacerbates the digital divide among different user groups, and the fact that various agencies deliver digital services through platforms developed with different quality standards and logic, confusing citizens. SIGMA notes that Armenia possesses strong technical capacity but lacks digital standardization and institutional coordination.

The assessment mapped 108 official digital platforms for public service delivery. These were launched by 19 state administrative bodies, including 10 ministries, the Tourism Committee, the Migration and Citizenship Service, bodies subordinate to the government, the Prime Minister's Office, and bodies under its authority.

INTRODUCTION

Digital Transformation in Armenia



Strategic Framework

Digitalization strategy of Armenia for 2021-2025 aims to create an efficient, transparent and accountable governance system using digital technologies, ensuring secure, accessible and convenient services for all citizens.



SIGMA Assessment 2025

According to the SIGMA report, Armenia has achieved **54% progress** in digital governance-the highest among all sectors. However, systemic gaps persist in quality assessment mechanisms and platform accessibility.



Digital Ecosystem

The assessment cataloged **108 official digital platforms** across **19 government bodies**, including 10 ministries, the Tourism Committee, Migration and Citizenship Service, the Prime Minister's Office and bodies under its authority.



Key Challenges

- **Fragmented Development:** Different platforms use varying technologies, databases and management approaches without unified standards.
- **Digital Divide:** Complex and inaccessible interfaces deepen the gap between different user groups.
- **Weak Institutional Coordination:** Strong technical potential exists, but digital standardization and institutional alignment are lacking.

This Assessment evaluates three most prominent, participatory, and widely-used digital platforms for state-citizen interaction.

INTRODUCTION

Assessment Objectives

The assessment aims to **analyze and reveal systemic issues** in digital platforms that hinder their full and participatory use by citizens, while evaluating their compliance with digital service design standards, public administration transparency principles, and user needs.

For this comprehensive assessment three platforms were selected: hartak.am, e-draft.am and e-request.am as the most well-known, participatory and widely used digital tools for state-citizen digital interaction in Armenia. They cover key government services-from official requests for information to citizen participation in legislative activities and best reflect both the advantages of digital governance and existing challenges, systemic issues such as medium-level assurance of data security, inclusivity and accessibility, incomplete feedback mechanisms and others.

The assessment inventoried 108 official digital platforms for public service delivery. These were launched by 19 state administrative bodies, including 10 ministries, the Tourism Committee, the Migration and Citizenship Service, the Prime Minister's Office and bodies under its authority.

The objectives of assessing these platforms are:

1. To assess the overall effectiveness of platforms such as G2C (Government to Citizen) digital services,
2. To assess platform compliance with the Web Content Accessibility Guidelines (WCAG 2.1),
3. To assess the practical value of services and the level of digitalization-to determine how fully they solve citizens' problems in complete digital format,
4. To study the technical reliability, speed, and uninterrupted operation of platforms,
5. To assess the level of personal data protection, security, and privacy assurance,
6. To analyze the effectiveness of feedback, engagement, and support mechanisms with users,
7. To assess platform transparency from the perspective of accessibility of responsible bodies, legal bases, and statistical data,
8. To study navigation solutions and compliance with Armenia's Digital Service Design Standard,
9. To develop and present practical recommendations aimed at addressing identified systemic problems and improving the effectiveness of service delivery platforms.

INTRODUCTION

Assessment Objectives

- 1 G2C Service Evaluation**
Assess platforms as Government-to-Citizen (G2C) digital services, measuring their effectiveness in delivering public services online.
- 2 WCAG 2.1 Compliance**
Evaluate compliance with Web Content Accessibility Guidelines (WCAG 2.1) to ensure inclusive access for users with disabilities.
- 3 Digitalization Level**
Assess service value and digitalization degree to determine how completely they solve citizen problems in digital format.
- 4 Technical Reliability**
Study platform technical reliability, speed and uninterrupted operation across different time periods and locations.
- 5 Data Protection**
Evaluate personal data protection, security, and privacy levels, ensuring compliance with national legislation.
- 6 User Engagement**
Analyze feedback mechanisms, user engagement and support effectiveness to ensure responsive service delivery.
- 7 Transparency**
Assess platform transparency regarding responsible bodies, legal bases and statistical data availability.
- 8 Navigation Standards**
Study navigation solutions and compliance with Armenian Digital Service Design Standards.
- 9 Practical Solutions**
Develop practical recommendations to address identified systemic issues and improve platform effectiveness.

INTRODUCTION

Assessment Methodology

The assessment employed **45 criteria** across **7 main categories**, based on national legislation, international best practices, Armenian Digital Service Design Standards, Digital Architecture Principles and WCAG 2.1 guidelines.

The assessment was conducted using the following methods:

1. Platforms were evaluated against 7 pre-defined main groups of criteria: accessibility and ease of use, service applicability and quality, technical reliability and speed, security and personal data protection, feedback and user support, transparency, as well as navigation and technical compliance with [Armenia's Digital Service Design Principles and Standards](#).
A total of 45 criteria were applied.
2. Each criterion was evaluated on a three-level assessment scale: **full compliance, partial compliance, non-compliance**. This approach allowed not only recording compliance facts but also revealing quality gaps and potential improvement.
3. Through direct observation of platforms, experts conducted operational and content analysis of each platform. The structure of platforms, navigation solutions, completeness of services provided, accessibility of published information, language accessibility, and usage logic were studied, examining the citizen's actual journey through the platform.
4. User journey mapping was implemented. Test trials of digital services were conducted in each platform, including registration, input and submission of applications/requests, submission of proposals regarding legal acts, from beginning to end (end-to-end testing, recording all obstacles citizens face at various stages of receiving digital services).
5. Technical audit: using automated tools (such as Google Lighthouse, [WAVE Web Accessibility Evaluation Tools](#), and others), the speed, security, adaptability, and accessibility of digital platforms were checked.
6. Assessment results were summarized in an assessment report. For each identified problem, practical and applicable recommendations were developed aimed at improving the effectiveness of specific platforms.
7. Based on assessment outcomes, policy level recommendations were also developed representing long-term ecosystem and policy-oriented solutions, ensuring the quality and systemic development of Armenia's public digital services.

The 45 criteria for assessing online service delivery platforms are based on requirements established by national legislation as well as international best practices. They were also informed by the jointly developed [Digitalization Principles](#), [Digital Architecture Principles](#), Armenia's [Digital Service Design Standard](#), and [Web Content Accessibility Guidelines](#) (WCAG 2.1). The criteria are presented in Appendix 1 of the assessment report.

ASSESSMENT METHODOLOGY

Evaluation Framework

**Accessibility & Usability****19**

Criteria

Platform naming clarity, registration simplicity, FAQ availability, accessible language, mobile compatibility, WCAG 2.1 AA compliance.

Registration

Platform

FAQ section

Accessibility

**Functionality & Quality****2**

Criteria

Digitalization level (4-tier scale), application tracking capabilities and interactive user engagement features.

Digitalization

Tracking

Interactivity

**Technical Reliability****3**

Criteria

Platform availability, loading speed (max 2 seconds) and cross-browser compatibility (Chrome, Safari).

Availability

Speed

Compatibility

**Security & Data Protection****3**

Criteria

HTTPS security, compliance with Personal Data Protection Law

**Feedback & Support****4**

Criteria

Hotline, online chat, email support, technical issue reporting, user experience evaluation mechanisms.

**Transparency****4**

Criteria

Responsible body contacts, legal basis documentation, user satisfaction results, statistical data availability.

**Navigation & Technical****10**

Criteria

User-friendly interface, consistent typography, memorable address, search functionality, content download options.

Accessibility assessment was conducted based on the principles of the Web Content Accessibility Guidelines (WCAG 2.1) with special attention to usability and applicability for users with visual and hearing impairments. Simultaneously, accessibility presence in the platform was checked, analyzing differences between published accessibility declarations and practical application. Accessibility assurance was also checked using the [WAVE Web Accessibility Evaluation Tools](#) online tool, as well as professional programs and screen readers used jointly with specialized organizations. Assessment of technical reliability and speed was conducted through practical platform use—testing access at different times and from different geographic locations. Site availability and page loading speed were examined.

Within the framework of **security and personal data protection** assessment, policies published on platforms were studied, transparency of information regarding data processing, the proportionality and appropriateness of personal data required for using digital services to the stated purpose. Assessment of feedback and user support mechanisms was conducted through both functional analysis and practical testing. Contact means available on platforms were tested, response timeframes, and predictability of the communication process for the user.

To assess platform **transparency**, checks were made for the presence of the name of the state body operating the platform in the visible section, feedback means, the name and surname of the official responsible, their phone number and email address. Simultaneously, checks were made on whether normative legal acts related to the platform's operation were properly presented. Particularly important was also the availability of platform user assessment results, as well as complete and comparable statistical data on the platforms.

The comprehensive assessment report is available in Armenian and English.

Preliminary and final assessment results were presented to platform operating/servicing state bodies - Ministry of High-Tech Industry, Ministry of Justice, EKENG, Armenian Agency of Information Systems, Prime Minister's Office Department of Participatory and Open Governance Issues, civil society, [Open Government Partnership](#) Armenia Working Group members, as well as international partners to serve as a basis for reforms aimed at improving the accessibility, applicability, and public trust of electronic participation digital tools.

We hope this assessment can lay the groundwork for forming a unified model and tools for assessing online service delivery platforms (Measuring Performance). Making regular assessments of official digital platforms a standard process will create opportunities for comprehensive reform of these resources. It will also serve as a foundation for developing a unified development strategy for official platforms and creating innovative tools, making official information management and digital service delivery more efficient and useful for both citizens and government.



Data was collected and the assessment was conducted from December 2025 to January 2026.

EXECUTIVE SUMMARY AND KEY FINDINGS

Assessment of Online Service Delivery Platforms hartak.am, e-draft.am, e-request.am

The purpose of this assessment is to analyze and identify the systemic issues of digital service delivery platforms that hinder their full and participatory use by citizens. Within the framework of the assessment, three flagship digital service delivery platforms were assessed, which constitute the cornerstones of state-citizen (G2C) interaction in Armenia's digital governance ecosystem.

Conducted by the Freedom of Information Center of Armenia within the "Digital Democracy in Action" program with support from GIZ, this study examines hartak.am: the unified gateway to public services, e-draft.am: the platform for public consultation on legal drafts and e-request.am: the unified electronic inquiry system.

The evaluation was conducted between December 2025-January 2026, using 45 criteria across seven dimensions: accessibility and ease of use; service functionality and quality; technical reliability and speed; security and personal data protection; feedback and user support; transparency; and navigation and technical compliance with Armenia's Digital Service Design Standard.

The assessment reveals a fragmented digital landscape where only one platform hartak.am fully complies with national digital service standards. While all three platforms demonstrate significant potential for transforming citizen-state relations, systemic gaps persist that undermine their effectiveness, inclusivity, and public trust.

Key policy level recommendations were drawn up aimed at increasing the efficiency and systemic development of Armenia's digital service delivery ecosystem.

KEY FINDINGS

The key findings are summarized as follows:

- 1. Compliance with the unified digital standard:** The assessment reveals that, in the absence of a unified state policy and standardized approaches to digital transformation, the digitalization of public services has proceeded along a decentralized trajectory, resulting in fragmented and inconsistent solutions. The development of digital platforms has generally lacked the application of common criteria and standards, leading to significant divergence in operating systems, programming technologies, database structures, management practices, and accessibility. The sole exception identified is hartak.am, which has been developed in alignment with Armenia's Digital Service Design Principles and Standards. This highlights the critical need for comprehensive reform to ensure that all digital platforms conform to unified standards, thereby fostering interoperability, efficiency, and accessibility across the public sector.
- 2. Accessibility and Inclusivity:** The effectiveness of official digital platforms is determined not merely by their existence, but by the extent of their actual use by citizens and their inclusivity across diverse social groups, including persons with disabilities and residents of rural regions. The evaluation results indicate that the applicability, accessibility and predictability of the selected platforms remain systemic challenges. Accessibility continues to be particularly problematic for persons with disabilities and rural populations. From the perspective of compliance with

international accessibility standards, only **hartak.am** fully meets the requirements of the WCAG 2.1 framework. In contrast, the other two platforms exhibit notable shortcomings. For instance, technical testing of **e-request.am** revealed several issues, including insufficient color contrast, the absence of tools for adjusting font size, and the presence of images without accompanying text descriptions. Moreover, usage of this platform among rural residents remains significantly low. Although the accessibility of **e-draft.am** has been substantially improved following reforms implemented in 2025, certain accessibility-related challenges persist. Ensuring full compliance of all public digital platforms with the [WCAG 2.1 international accessibility standards](#) must therefore be regarded as a central priority in the comprehensive reform agenda for Armenia's digital transformation.

3. **Personal Data Protection and Information Security:** The protection of personal data and the safeguarding of information security have not yet been sufficiently institutionalized within public digital service platforms. A particularly contentious issue remains the proportionality of personal data processing required during user registration. The processing of personal data must strictly adhere to the provisions of the Republic of Armenia's [Law on Personal Data Protection](#). Data security assurance must constitute a continuous process to ensure public trust. One platform does not publish a Privacy Policy clearly specifying what personal data is processed, for what purpose, how it is stored, how its security is ensured, the legal basis for data processing, who may have access to their data, data retention periods and other pertinent information.
4. **Transparency:** Deficient transparency impedes public oversight, diminishes public trust in platforms and undermines civic engagement. According to assessment findings, none of the three platforms examined achieves full assurance of the requisite level of transparency. The incompleteness or absence of data regarding responsible bodies, contact mechanisms for officials, legal bases for platform application, statistical data, and user satisfaction results obstructs public oversight and civic participation.
5. **Feedback, User Engagement and Technical Support, including through Artificial Intelligence tool integration:** Users reporting technical or content-related issues do not consistently receive timely and substantive responses to their concerns. Platforms lack complete contact information regarding whom and through what procedures citizens may notify in cases of technical or content-related issues. Underdeveloped feedback mechanisms diminish the reliability of digital platforms, while digital services cease to function as "services" devolving into mere information platforms. Assessment findings demonstrate that feedback-related challenges can be addressed through artificial intelligence solutions. Further enhancement of these digital platforms must incorporate AI tool integration, ensuring rapid and substantive engagement with users; complete, comparable and updated statistical data; entirely new quality in state-citizen interaction; as well as platform inclusiveness and effectiveness. Critically, AI tool integration must proceed as a systematic and transparent process ensuring personal data protection, human rights and AI ethics¹.
6. **Incomplete and Incomparable Statistical Data and Ineffective Publication Formats:** Statistical data published on some service platforms is incomplete and does not enable the acquisition of comparable data across different time periods. The publication format does not permit full utilization of the data. Yet the completeness and comparability of statistical data constitute key criteria for assessing digital platform effectiveness. Platforms must provide open, machine-readable

¹ See OECD Report, [Governing with Artificial Intelligence](#), September 2025, Section 2.

statistical data for reuse that presents a complete and comparable picture. Such data must be useful and suitable for reuse.

- 7. User Experience Evaluation:** The absence of systematic mechanisms for assessing and improving digital services constrains platform development. Among the assessed platforms, only hartak.am provides the functionality to evaluate each service delivery page and reflects this data through accessible and updatable statistical visualizations. Users must possess the capability to influence and assess the process. Without continuous, independent, and data-driven assessment, it is impossible to ensure high platform applicability and public trust in them. To this end, it is necessary to introduce a unified model for platform assessment and continuous improvement, through which state bodies will be apprised of user experience and able to respond substantively and in a timely manner. Digital platforms must also publish user satisfaction results from utilizing digital services.

Finally, even the best platform is useless if people do not know about it or cannot use it. In this regard, it is extremely important to ensure regular awareness campaigns about the existence, usefulness, and mechanisms for using digital platforms, providing people with accessible and comprehensive information.



The assessment concludes that Armenia has a strong technical potential for digital transformation, and success depends on how quickly and comprehensively the transition from fragmented, agency-specific approaches to a coherent, citizen-centered digital ecosystem will be established, governed by unified standards, high accountability and continuous improvement based on the user experience.

KEY FINDINGS OVERVIEW

Cross-Platform Findings

1 Non-Compliance with Unified Standards

The majority of platforms were developed without applying unified digital standards. They operate on fundamentally different principles regarding operating systems, programming technologies, databases, and data management. Only **hartak.am** fully complies with Armenian Digital Service Design Standards.

2 Accessibility & Usability Challenges

Platform usability, accessibility, and predictability remain systemic issues. Accessibility for persons with disabilities and regional residents is particularly problematic. Only **hartak.am** fully complies with WCAG 2.1 international accessibility standards.

3 Underdeveloped Feedback Mechanisms

Underdeveloped feedback and user support mechanisms reduce platform reliability and effectiveness. Citizens reporting technical or content issues do not always receive timely and comprehensive responses. Some platforms lack complete contact information.

4 Transparency Gaps

Lack of transparency hinders public oversight and reduces trust. Missing or incomplete data about responsible bodies, contact information, legal bases, statistical data, and user satisfaction results obstruct citizen participation. **None of the 3 platforms fully ensures necessary transparency level.**

5 Data Protection Concerns

Personal data protection and information security are not sufficiently institutionalized. The proportionality of personal data required during registration remains problematic. One platform lacks a published Privacy Policy clearly stating what data is processed, for what purpose, and how security is ensured.

6 Incomplete Statistical Data

Published statistical data is incomplete and does not enable comparative analysis across different time periods. Publication formats do not allow full data utilization. Platforms should provide open, machine-readable statistical data that offers complete and comparable pictures.

7 Absence of User Experience Evaluation

Users should have the ability to influence or evaluate processes. The absence of systematic mechanisms for evaluating and improving digital services limits platform development. Only **hartak.am** enables service evaluation and reflects this data in accessible, updatable statistical visualizations.

KEY FINDINGS OVERVIEW

Platform Performance Comparison

hartak.am

National Services Gateway

Full Compliance **43**Partial Compliance **2**Non-Compliance **0****95.6%**

Compliance Rate

e-draft.am

Legal drafts platform

Full Compliance **24**Partial Compliance **13**Non-Compliance **6**Not Applicable **2****56%**

Compliance Rate

e-request.am

Electronic Requests Platform

Full Compliance **27**Partial Compliance **10**Non-Compliance **8****60.0%**

Compliance Rate

Platform Usage Statistics (2025)

hartak.am**464,887**

Users

729,792

Visits

e-draft.am**174,075**

Users

3124

Suggestions

e-request.am**150,000**

Users

237,000

Letters

HARTAK.AM ASSESSMENT

National Services Gateway Platform

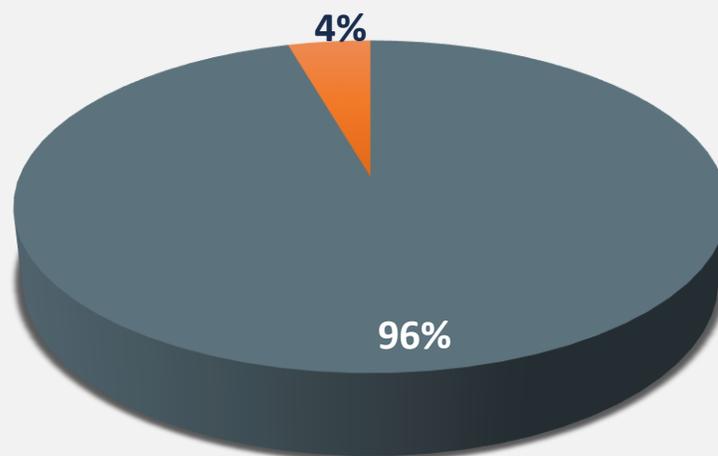
[Hartak.am](#) serves as the unified national digital platform for services, functioning as a one-stop interaction point between users and public services in the Republic of Armenia. The platform provides comprehensive information and direct links to state digital services that citizens utilize throughout various life events and administrative procedures.

This digital platform has been developed in strict accordance with the principles of digital service design standards. The landing page indicates that the platform is currently available in beta version and remains under active development.

Hartak.am operates as a G2C (Government to Citizen) digital platform, facilitating direct digital communication between the state and its citizens. This architecture enables individuals to access all state digital services and resources through a centralized interface.

The evaluation revealed exceptional performance across the assessment framework. Of the 45 total assessment criteria, Hartak.am platform achieved full compliance with 43 criteria and partial compliance with 2 criteria. No instances of non-compliance were identified. This outcome represents the highest level of performance among all platforms evaluated in this assessment, demonstrating the adherence of the Hartak.am to international best practices and national digital standards.

hartak.am



■ Full compliance: 43 criteria

■ Partial: 2 criteria

■ Non-compliance: 0



Hartak.am Assessment

1. Accessibility and Ease of Use

The first group of assessment criteria is the level of accessibility and ease of use. These criteria help determine how easy it is for a citizen to utilize the services provided by the platform.

The platform's name is simple and clear.

The main page contains a list and description of key services, providing essential information about the content and purpose of the services offered.

The digital platform allows users to read, download and copy data without mandatory registration. However, to use the specific digital services presented on the platform, registration on the corresponding service page is required, involving the input of various personal data. This is logical, as user identification is mandatory.

Numerous FAQs (Frequently Asked Questions) are published on the platform visible under each service, which we consider the right approach. It is essential that FAQs are consistently updated and supplemented in a timely manner, which would make using this platform easier and more efficient.

Similarly, guides illustrating the operation of diverse services are published on the platform. Though, we note the absence of a guide for using the Hartak.am platform itself on its first page.

The assessment results indicate that the platform's accessibility is fully ensured for users with visual impairments. An [Accessibility Statement](#) is published on the platform, stating that the website complies with the Web Content Accessibility Guidelines (WCAG). Our online verification of the platform shows no unresolved issues in terms of accessibility. Online checks were conducted using Google Lighthouse and [WAVE Web Accessibility Evaluation Tools](#), which indicated full compliance with accessibility standards.

The platform's services are accessible to everyone. The availability of information in English facilitates the use of the platform by foreigners. Access to the English version is possible by clicking on the National Services Gateway subheading and language selection is also available via the button located in the upper right corner of the page.

Although the platform lacks a dedicated technical support section, a tool for reporting technical issues is available in the footer of every page. Yet it is not entirely clear to the user in what format support will be provided; there is no information on how a citizen who reports a technical problem will receive a response from the state body.

It is worth mentioning that the Freedom of Information Center applied to the Information Systems Agency of Armenia on December 5, 2025, regarding Hartak.am's compliance with WCAG 2.1 accessibility standards. The Agency's official response states that the platform complies with Level AA of the WCAG 2.1 standard. The latest accessibility audit of the platform was conducted in May 2025.

Overall, from the perspective of accessibility and ease of use, no significant issues were recorded on this platform.



Recommendations

To promote the platform's accessibility and ease of use, we recommend the following:

1. Ensure the availability of a guide for using hartak.am on the main page, in a prominent location. This guide should provide clear instructions to guide and assist the user. Furthermore, it is advisable to present it in an engaging and visual format to facilitate quicker and more accessible comprehension of the material.
2. Make technical support predictable, understandable and swift for the user. Responses to issues reported through the platform must be ensured to be comprehensive and timely.

2. Functionality and Service Quality

This group of criteria helps assess whether the platform solves a citizen's problem or merely provides information. These criteria facilitated in analyzing the degree of digitization of services, opportunities for interactive engagement with users, and the quality of services delivered online.

The study results rated the platform as being in full compliance with **Service Delivery Level 4** (full digital service delivery without a visit to a state body). Through the platform, people can receive a public service in its entirety, from application to full receipt, without visiting a state body. Indeed, to make this process smoother and more efficient, the platform still requires certain improvements, but overall, it meets the requirements for Level 4 compliance.

Thus, from the perspective of functionality and service quality, no significant issues were recorded on this platform.

3. Technical Reliability and Speed

This group of criteria helps determine the reliability and speed of the platform's operation.

Our studies have shown that the platform operates seamlessly at various times of the day, both within the Republic of Armenia and abroad, with no observed technical issues. The website loads quickly and the loading speed of individual pages is stable and independent of usage peak times, which is undoubtedly positive.

Google Lighthouse testing indicated that the loading speed for individual pages is up to 3.5 seconds.

Therefore, the platform is fully compliant from the perspective of technical reliability and speed.

4. Security and Data Protection

This group of criteria helps assess the security level of using the platform.

The effectiveness of Hartak.am is dependent on information security and ensuring proper protection of personal data. Using the platform does not require prior registration or the submission of personal data.

In some instances, the platform links to other state websites (e.g., e-request.am), which have their own rules and frameworks for processing personal data.

The platform publishes a [Privacy Policy](#) that clearly presents the conditions for processing personal data and the security mechanisms for their protection. It provides detailed information on the collection, storage, and use of personal data, as well as the technical and organizational measures applied to ensure data security. The Privacy Policy is published on the platform's main page and is written in clear and comprehensible language.

Thus, no issues were identified regarding security and personal data protection on the platform.

5. Feedback, Engagement and Support

This group of criteria helps assess the extent to which citizen feedback and support during the platform usage process are ensured.

While there is a technical tool at the bottom of each page to report a problem encountered on the platform, and an email address is published in the ["About the Platform"](#) subsection, the platform lacks digital solutions that would make feedback mechanisms with the user effective. For instance, the platform does not feature an online chat or an automated assistant that would allow users to receive immediate support when needed.

The tool available at the bottom of every page is for reporting technical problems. The user must fill out a form or draft an email, send it, and wait 72 hours (*the Accessibility Statement published on the platform indicates that responses to suggestions or problems will be provided within 72 hours*). We note that this form is universal and does not differentiate the type of message (suggestion, problem, evaluation, etc.).

There is also no option to attach an image/document. Furthermore, there is no ability to track the status of a submitted query; the user does not know if their message is being processed or not. Moreover, on December 14, we used this tool to report a technical issue related to accessibility, to which the state body did not respond. It is also unclear whether a person can use this mechanism to file a complaint or present suggestions on the platform.

Under the [About Us](#) section, the platform provides contact information, including the name of the state body operating the platform, its physical address, telephone number, and email address. Contact information is also referenced in the Accessibility Statement.

According to the official response provided by the Armenian Agency of Information Systems, the body operating the platform: Hartak.am received 464,887 unique users during the period from January 1 to December 31, 2025. The total number of visits during the same period was 729,792, indicating that individual users accessed the platform multiple times.

The platform does provide an opportunity to evaluate the user's experience. The evaluation results are accessible in the ["User Opinions"](#) subsection (for more details, see the "Transparency" section of the study).

Overall, from the perspective of ensuring feedback and user engagement, the platform's compliance was assessed as not fully satisfactory.



Recommendations

To enhance feedback mechanisms and user engagement, we recommend the following:

1. Implementation of digital support solutions, including an online chat (chatbot) or artificial intelligence assistant tool, to provide users with immediate and instant assistance.
2. Ensuring timely and comprehensive responses: It is essential that users submitting suggestions, complaints, or issues receive prompt and complete information regarding their submissions. Furthermore, every communication regarding technical problems should receive an appropriate response. It is also recommended to add technical functionality allowing users to attach documents or images when reporting technical issues through the reporting tool.

Notably, according to representatives of the Armenian Agency of Information Systems, the state body operating the platform, these recommendations are already in development and will be implemented in the near future.

6. Transparency

This group of criteria helps assess the level of transparency ensured by the platform.

The platform's transparency depends on the information made available to users on the main page. The primary goal of transparency is to provide the user with sufficient contact, procedural, and statistical information so they clearly understand the operational procedures of the platform and its responsible entities.

Hartak.am does not publish information regarding the responsible official for information, specifically, their name, surname, telephone number, or email address. This limits the user's ability to establish direct contact for technical or professional inquiries and suggestions.

The platform does provide functionality for users to leave feedback regarding their experience, and summary data from these assessments is published. Specifically, the platform presents data on which services and pages users visit most frequently, as well as which services receive the highest or lowest ratings. However, it is unclear what time period these data cover. The same applies to the statistical data, as information regarding preceding periods is not available. Consequently, dynamic observation, comparative analysis, or systematic evaluation is impossible, which diminishes the analytical value and transparency of the website.

Thus, the most significant issue identified on this platform relates to the incomplete and inadequate nature of the statistical data.



Recommendations

1. We recommend publishing the legal basis for the platform's creation and management within the "About the Platform" subsection.
2. We suggest publishing information about the official responsible for the information: name, surname, phone number or email address. This will allow the user to contact directly for technical and professional recommendations.

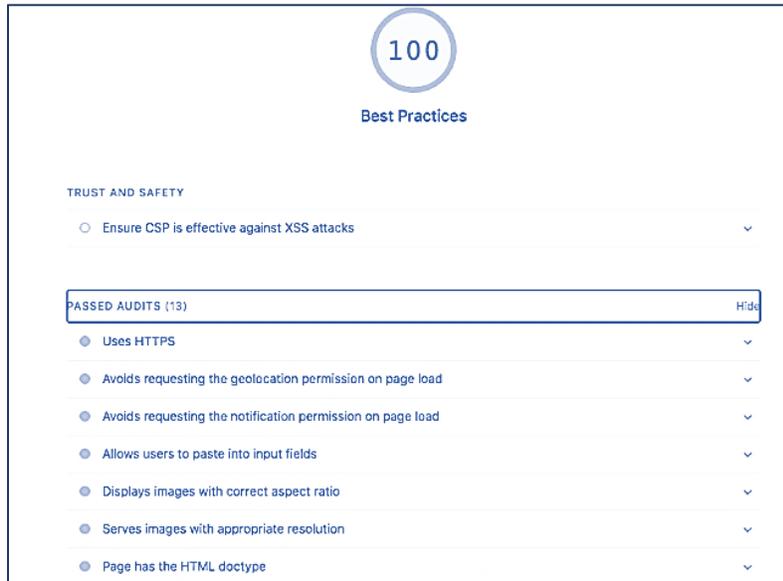
7. Navigation and Technical Standards

The assessment of the platform's navigation and technical aspects is based on the Armenian Digital Service Design [Standard](#), "[Henaket](#)" Design System).

Our study indicates that the platform fully complies with the Armenian Digital Service Design Standard. The platform provides clear navigation, has a simple interface and harmonious color schemes. The font is consistent across all sections of the platform, and the font size is legible. The platform has a short, easily memorable address. Key services are consistently accessible from the homepage. Unloaded text is used to present the platform's content in accessible language, applying the "one idea per paragraph" principle.

The platform allows copying, printing and downloading content. It features a search system that provides accessibility, enabling searches by complete words, phrases, or sentences.

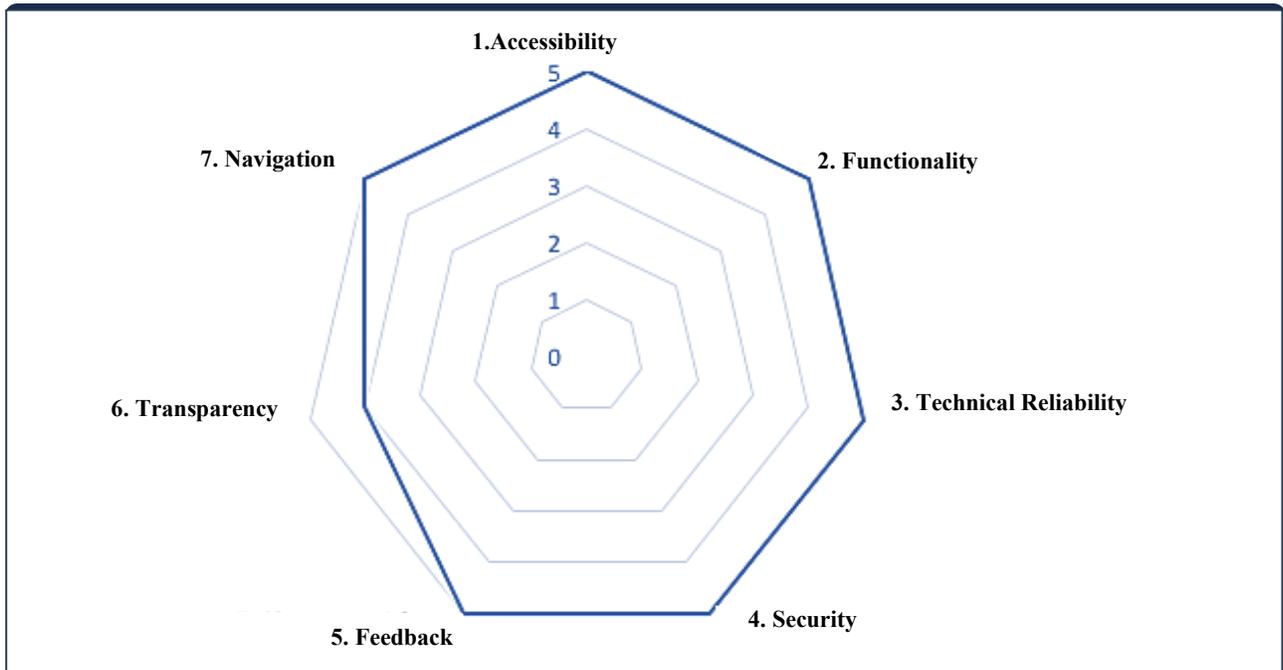
The platform ensures sufficient color contrast between text and background, facilitating reading for users with normal vision.



An online check we performed using Google Lighthouse also confirms 100% compliance with this criterion, identifying the platform as one that provides best practices.

Source: Google Lighthouse

Thus, the radar diagram of Hartak.am's evaluation results is depicted as follows:



The diagram shows that hartak.am provides full compliance in 6 out of 7 groups of evaluation criteria: good accessibility, flexible navigation system, smooth and fast application, high technical reliability. The only problem recorded on the platform concerns Transparency, in particular the completeness and comparability of statistical data.

HARTAK.AM ASSESSMENT

Hartak.am: Strengths

**Best Performing Platform**

Hartak.am is the **only platform fully compliant** with Armenian Digital Service Design Standards and WCAG 2.1 AA accessibility standards, serving as a unified access point to all government digital services.

**Full Accessibility Compliance**

The platform fully meets WCAG 2.1 AA standards. Online checks using Google Lighthouse and WAVE tools showed **no unresolved accessibility issues**. Services are available to all users, including those with visual impairments.

- ✓ Accessibility audit conducted May 2025

**Robust Privacy Protection**

A comprehensive Privacy Policy is published on the main page, clearly presenting personal data processing conditions and security mechanisms. Written in simple, understandable language.

- ✓ No registration required for basic access

**Technical Excellence**

The platform operates without interruption at different times of day, both in Armenia and abroad. Page loading speed is up to **3.5 seconds**, stable and independent of usage load.

- ✓ Google Lighthouse best practices: 100%

**User Feedback Mechanisms**

Each page has a tool for reporting technical issues. Users can evaluate their experience with each service page, with results displayed in accessible, updatable statistical visualizations.

- ✓ 72-hour response commitment

43/45

Full Compliance

2/45

Partial Compliance

0/45

Non-Compliance

HARTAK.AM ASSESSMENT

Hartak.am: Areas for Improvement



Primary Weakness: Transparency

The most significant issue identified relates to **incomplete and non-comparable statistical data**, limiting the platform's analytical value and transparency.



Statistical Data Limitations

- Users can view which services and pages are most visited and rated, but it's unclear what time period this data covers.
- No data is available for previous time periods, making dynamic monitoring and comparative analysis impossible.
- This reduces the site's analytical value and transparency for researchers and policymakers.



Missing Contact Information

- No published data about the responsible official—name, phone number, or email address.
- This limits users' ability to establish direct contact for technical or professional recommendations.
- While general contact information exists in the "About" section, specific responsible person details are absent.



Key Recommendations

1

Statistical Time Range Expansion: Enable users to view data not only for the last year but also for previous years and specific time periods, allowing comparative and dynamic analysis.

2

Responsible Official Contact: Publish data about the responsible official, name, phone number, or email address, to enable direct contact for technical recommendations.

3

Platform Usage Guide: Ensure availability of a usage guide on the main page with understandable instructions to guide and support users effectively.

E-DRAFT.AM ASSESSMENT

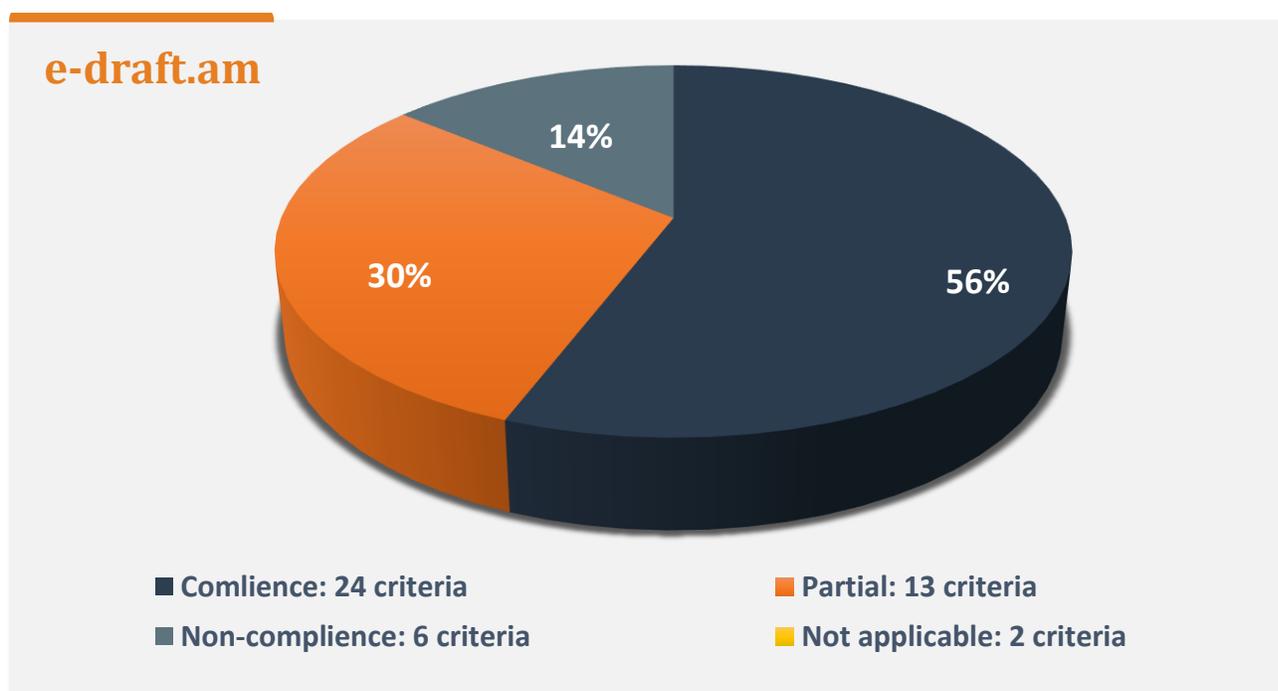
Unified Website for Publication of Draft Legal Acts

[E-draft.am](#) is a unified digital platform for publishing draft legal acts of the Republic of Armenia, which is used to present draft legal acts to the public and organize public discussions. The platform was launched by the Ministry of Justice of the Republic of Armenia. The platform was created within the framework of the "[Open Governance Partnership](#)" initiative. It was included as a separate commitment in the OGP 2014-16 Action Plan. On October 22, 2025, an updated version of the platform was launched.

It provides an opportunity to familiarize yourself with draft legal acts, search for projects, follow their further progress; get acquainted with the submitted proposals, and in case of registration on the website, also submit proposals, get acquainted with the summary of proposals on the projects, accepted proposals or justifications for not accepting them.

The platform is a G2C (Government-to-Citizen) class digital platform, providing an electronic service for participating in public discussions on draft legal acts. It meets the primary criteria of a digital service as it features an interactive toolkit, a feedback mechanism, and a fully digitized solution for the legally established procedure.

The study revealed that out of the total 45 assessment criteria, the platform demonstrates full compliance with 24 criteria, partial compliance with 13, and non-compliance with 6. 2 criteria are not applicable to this specific platform.





E-draft.am Assessment

1. Accessibility and Ease of Use

The first group of assessment criteria is the level of accessibility and ease of use. These criteria help determine how easy it is for a citizen to utilize the services provided by the platform.

The study shows that the platform is generally accessible. Particularly due to the recent modernization, various tools for ensuring accessibility have been added to the platform. However, some essential elements of the platform still require improvement.

The digital platform allows reading, downloading and copying data without mandatory registration. However, mandatory registration is required to participate in the discussion of drafts, which requires entering a specific set of personal data: name, surname, email, gender and country. Registration is not confirmed without these. There are also optional personal data fields: phone number and address. The registration process is understandable and simple, although the mandatory nature of some fields ("gender," "country") lacks proper justification.

The platform meets accessibility criteria for people with visual and hearing difficulties. Specifically, it includes tools to ensure color contrast and change font sizes for users with visual impairments. However, [videos](#) in the "[User Guide](#)" section published on the first page lack subtitles or sign language interpretation, limiting full information accessibility for users with hearing difficulties. Considering the videos have informational value and are intended to facilitate effective use of the platform, it is advisable to provide an alternative text format.

Online checks were also conducted using Google Lighthouse and [WAVE Web Accessibility Evaluation Tools](#), which also indicated that the platform still has some issues regarding accessibility compliance.

This issue was also noted in the OECD's "Innovative Capacity and Participatory Policymaking in Armenia" [report](#) (page 23), which notes that the platform is currently not usable by people with disabilities (e.g., people with visual impairments) as it lacks the necessary accessibility features (e.g., alternative text instead of images, keyboard input, audio version of the text).

The platform also lacks an Accessibility Statement, which should outline the extent of the platform's accessibility for people with visual and hearing difficulties, existing issues and steps being taken to address them. Users may encounter difficulties when searching for the platform on Google if they try to open it without entering the correct characters (e.g., without the hyphen).

The platform's FAQ section is incomplete. The "[Frequently Asked Questions](#)" subsection contains only one question and one answer. This limited FAQ section restricts users' ability to understand the platform's functions quickly and effectively.

The platform's main menu is available in Armenian, English, and Russian. However, published documents, drafts, and summaries are only in Armenian, reducing accessibility and engagement for non-Armenian speaking users.

The information presented on the platform is objectively legal. For individuals involved in the professional field, its content and structural logic are comprehensible. However, the titles of draft legal acts and attached documents are presented exclusively in professional legal terminology,

without explanatory or summarized descriptions. This may limit the capacity of individuals without a legal or higher education to fully comprehend the content of the drafts.

The platform lacks a dedicated section for technical support. The main page has a tool for reporting technical issues, but it directs users to an area for submitting "suggestions," including those related to published drafts. It is not perceived as a channel for reporting technical problems, even if it was designed for that purpose. To submit a suggestion here, the user must log into the system.

It is worth mentioning that the Freedom of Information Center applied to the Ministry of Justice of the Republic of Armenia on December 5, 2025, regarding the E-draft platform's compliance with WCAG 2.1 accessibility standards. The Ministry's official response states that during the 2023 modernization, compliance with the WCAG 2.0 standard was ensured and work on achieving compliance with the WCAG 2.1 AA level is planned for the near future; an accessibility audit will be conducted after the finalized modernization. During a meeting on December 24, 2025, with representatives of the managing state body, the Ministry of Justice, it was noted that the platform's full compliance with accessibility standards will be completed in 2026.

Thus, from the perspective of accessibility and ease of use, while no critical issues were recorded on this platform, there are noteworthy matters that need to be addressed to ensure full accessibility. Specifically, the volume of mandatory data for registration, the incomplete FAQ section, the lack of subtitles in videos, the absence of a technical support section, the lack of an Accessibility Statement and language limitations.



Recommendations

1. It is necessary to reorganize and improve the [FAQ subsection](#) by supplementing it with additional questions and answers to guide and support the user. Preferably, access to this section should be available on the website's main page.
2. Considering the important informational value of the "[User Guide](#)," it is advisable to present it in an engaging and visual format, including not only screenshots but also interactive or infographic elements to facilitate quicker and more accessible comprehension of the material.
3. It is proposed to also make available on the platform the [online toolkit](#) "How to use the E-draft.am platform" developed by the Freedom of Information Center, aimed at supporting the use of the platform.
4. To make the platform's content accessible in other languages, we recommend implementing a feature that allows the browser to automatically activate the translation tool (via Google or AI-powered tools) when needed. This will enable the translation of the entire page, including draft texts, into a preferred language with a single click, without requiring technical skills from the user. Until automatic translation is implemented, it is suggested to add a notice in English and Russian versions on the drafts' pages, indicating that the draft text is available only in Armenian and advising users to utilize their browser's translator to review the content.
5. It is necessary to ensure the presence of a dedicated technical support section.
6. It is necessary to publish the [Accessibility Statement](#) so that it is clear to users to what extent the platform complies with accessibility standards and what issues still remain unresolved.

2. Functionality and Service Quality

This group of criteria helps assess whether the platform solves a citizen's problem or merely provides information. These criteria facilitated in analyzing the degree of digitization of services, opportunities for interactive engagement with users, and the quality of services delivered online.

The platform is assessed as partially compliant with **Service Delivery Level 4** (full digital service delivery without a visit to a state body). This is because, while people can participate in the public development process of draft legislation entirely in a digital format, there are still some gaps in terms of providing comprehensive and timely responses to user suggestions.

Through the platform, users can participate in public discussions on drafts, submit proposals, and make observations. Users can also track the status of their submitted proposals and observe the progress of public discussions. However, a professional assessment recorded that complete and timely information regarding the subsequent outcome of comments and proposals submitted by users is not always ensured. Specifically, in some cases, it is unclear whether a proposal was accepted, rejected or remained undiscussed. Furthermore, in certain instances, proper justifications for rejecting a user's proposal are not presented.

However, it should be noted that ensuring this process is not always within the scope of the state body managing the platform. In some cases, responding to a user's proposal on this platform is the responsibility of other state bodies publishing draft legal acts. Therefore, specific mechanisms need to be introduced to establish unified practice.

Thus, the effectiveness of the platform's use and the quality of services are limited by the incompleteness of feedback and the uncertainty of the status of suggestions submitted by users.



Recommendations

The platform provides an important mechanism for public participation. To improve its functionality and quality, we recommend ensuring that users can track the status of their proposals and receive timely and comprehensive information regarding them. This will contribute to achieving full compliance with Digitization Level 4.

At the same time, given that responding to user suggestions in certain cases falls outside the scope of authority of the body operating the platform, it is therefore necessary to implement systemic solutions.

3. Technical Reliability and Speed

This group of criteria helps determine the reliability and speed of the platform's operation.

The effectiveness of the E-draft.am platform is highly dependent on its technical reliability and speed. Our research showed that at various times of the day, especially from abroad, technical issues are observed: in some cases, the website does not respond or opens with a significant delay. Speed tests of the platform's loading conducted as part of the assessment showed that noticeable delays occur when navigating from page to page at various times of the day. Furthermore, the loading speed of individual platform pages is not stable and depends on usage peak times.

Overall, the platform is sound in terms of technical reliability and speed. Nevertheless, issues related to loading speed and platform access are observed in some cases. Such instances can create negative user experience, reducing service accessibility and the effectiveness of public participation.



Recommendations

It is necessary to implement additional technical solutions to always ensure the platform's accessibility.

4. Security and Data Protection

This group of criteria helps assess the security level of using the platform.

The effectiveness of the E-draft.am platform is highly dependent on information security and ensuring proper protection of personal data. This platform does not process a large volume of personal data. However, certain functional capabilities like registration, login and submission of proposals/comments, require the mandatory submission of the user's personal data, such as name, surname, email, gender, country, etc. The requirement for some of this data is problematic from a legal compliance standpoint. It breaks the principle of proportionality in personal data processing by requiring the submission of data (such as gender and country) that is not necessary to achieve the stated purpose, failing to comply with the requirements of the Republic of Armenia's Law on Personal Data Protection.

Furthermore, a Privacy Policy is not published on the platform. Such a policy would clearly outline the rules for the use of personal data and the security mechanisms for its protection. This gap can limit user trust and the platform's level of transparency.

Thus, the platform's compliance with security and personal data protection standards is not fully adequate. The Privacy Policy is absent, and the proportionality of personal data processing remains problematic.



Recommendations

1. It is necessary to publish a Privacy Policy on the platform. This policy should present the terms for the collection, storage, and use of personal data, as well as the technical and organizational measures applied to ensure data security. The Privacy Policy should also include the legal bases for processing personal data, data retention periods, potential cases of data transfer to third parties, and user rights regarding data correction, restriction of processing, or deletion. The Privacy Policy must be published on the platform's main page and written in a clear and understandable language.
2. It is necessary to review the scope of personal data required for user registration, aligning it with the principle of proportionality and the requirements of the RA Law on Personal Data Protection. It is recommended to remove the "country" and "gender" fields from the list of mandatory registration fields or provide a clear explanation of the purpose for which this data is processed.

5. Feedback, Engagement and Support

This group of criteria helps assess the extent to which citizen feedback and support during the platform usage process are ensured.

The platform contains a Feedback section, which lists a hotline phone number and the official email of the managing state body, the Ministry of Justice of the Republic of Armenia. These contact methods allow users to get in touch regarding technical or operational questions. However, it should be noted that the hotline is the ministry's general hotline, which people call for a wide variety of issues.

Although a ["Report a Technical Issue"](#) subsection exists on the site, it requires registration or login to the system, the necessity and appropriateness of which are not justified. Furthermore, when selecting the "Report a Technical Issue" link, the user is directed at a section containing the message: *"The legislative proposals submitted in this section must relate to specific legal acts."* This wording and the content of the opened section are unrelated to the purpose of reporting technical problems, indicating that the corresponding link provides technically or structurally inappropriate navigation.

A user may also contact via email in case of technical issues, but this method cannot guarantee a quick response, and it is unclear within what timeframe a user can expect a reply.

The website also lacks tools for evaluating the user experience of the service, such as "How would you rate the service?" This gap limits opportunities for continuous monitoring of the platform's quality.

Another issue related to feedback on the platform is that when a user has questions regarding a particular draft legal act, they do not have the opportunity to find on the platform the contact details for the responsible state body for that draft.

From the perspective of user engagement, it is particularly important that users receive complete and timely information or feedback on the status of their submitted proposals. In practice, a user can send their proposals on drafts via email and through the platform's "Submit a Proposal" online tool. It is stated that if a proposal is submitted via email, it will be posted on the website within 10 working days, and if submitted via the platform's online tool, within 2 working days. When submitting a proposal regarding a legal act via the online tool, the message "Your application has been successfully accepted" appears on screen. However, the user does not receive an email confirmation regarding the fact of proposal submission. After admin approval, the proposal is published on the draft's summary page within two working days and the user is informed via email, including an active link directing to the summary page. However, this process is also not uniform. During testing conducted as part of the assessment, it was found that not all proposals are published on the site within the specified timeframe.

For instance, on December 14, 2025, a proposal regarding the draft law ["On Amendments and Addenda to the Labor Code of the Republic of Armenia"](#) and related drafts was submitted via the "Submit a Proposal" section. Although after submission the personal page displayed "Your application has been accepted," 10 days later the proposal was still under moderation. Moreover, it never appeared on that draft's summary page with a rejected or accepted status. The user did not receive any confirmation or rejection via email. Justifications should be adequate. Responses from public officials should provide detailed feedback so that it is clear why a suggestion was accepted or rejected or how it will be reflected in the final version of the test.

In some cases, it is also unclear to the user which parts of their proposal were accepted, which were rejected and importantly, the justification. The status of a proposal being "accepted for information" is also not noticeably clear to the user. This wording does not provide sufficient information regarding the subsequent handling of the proposal submitted by the organization or individual, who often have to contact the body directly for clarification. Furthermore, this process is individualized and not publicly presented on the platform, which reduces the digital platform's transparency and limits the functionality of user feedback and communication.

The platform is also flawed in terms of ensuring full engagement. According to the official response provided by the platform's managing body, the Ministry of Justice of the Republic of Armenia, as of January 1, 2026, there were **174,075 registered users on the platform**. Moreover, in 2025, the number of users increased by 5,898. **During 2025, 3,124 proposals were submitted on draft legal acts published on the platform.**

Thus, from the perspective of the criteria included in the Feedback section, the platform's compliance is not full. Specifically, the platform lacks user support tools. Although a tool for reporting technical problems exists, it does not contain clear instructions. Feedback with users who submit proposals on drafts is not always at a sufficient level, which is also influenced by the actions of other state bodies publishing draft legal acts. Justifications provided to users are sometimes delayed or entirely absent in some cases.



Recommendations

1. Content and technical feedback mechanisms must be implemented. Specifically, it is recommended to introduce modern digital support solutions, including artificial intelligence tools, to provide users with rapid and effective technical assistance. This can help users obtain immediate information regarding technical issues encountered on the platform.
2. On each published project page, we advise adding contact information for the relevant state body and responsible official to ensure feedback channels. This will also help users understand which institution is providing feedback on their proposals. Simultaneously, this will enable users to direct inquiries to the responsible official in all cases where additional information is required to formulate a proposal regarding a specific project.
3. It is necessary to ensure that a user who submits a proposal receives prompt and comprehensive information regarding its acceptance and/or rejection, along with justifications for rejection. We also recommend ensuring that a user submitting a proposal receives email confirmation of the submission, informing them that their proposal will be published on the draft's summary page within 2 working days.
4. We also suggest technically limiting the use of the "Accepted for information" wording in the summary sheet without accompanying explanation. The state body must clearly indicate whether the proposal has been accepted (fully/partially) or rejected, providing specific justifications. Also, in cases where it is stated that the proposal is subject to discussion, the user should be informed about the subsequent outcome, whether it was rejected or accepted.
5. The Select/Save buttons on the Summary Sheet sub-page are passive and non-functional. They need to be activated according to their intended purpose.
6. Provide users with the technical capability to evaluate their user experience on the platform, allowing them to assess their experience of using the service provided by the platform.

6. Transparency

This group of criteria helps assess the level of transparency ensured by the platform.

The transparency of the e-draft.am platform depends heavily on the information available to users on the homepage. The primary purpose of transparency is to provide users with sufficient contact, procedural and statistical information so that they clearly understand the operational procedures of the platform and the parties responsible.

The platform provides some contact information, such as the official address and email of the Ministry of Justice, as well as a hotline phone number. However, there are no clear details about specific responsible officials; names, surnames, phone numbers or email addresses. This limits the user's ability to establish direct contact for technical or professional inquiries. In practice, while the website allows one to understand which body is responsible for publishing a specific draft, it remains unclear exactly who to contact, which can delay public participation.

Our research indicates that normative legal acts related to the platform's operation (laws, decisions, orders, directives) are not published on the platform.

The website also lacks the publication of user satisfaction results. The absence of this information limits transparency, as the public cannot see how the platform's performance is rated or what changes are made based on their feedback.

The platform contains some [statistical data](#): by sector, chronology, number of registered users and number of visits. However, only the indicators for the last year are presented, and data for the previous period are not available. As a result, it is impossible to observe the dynamics of projects, conduct comparative analysis of different years, or conduct a systematic assessment, which reduces the analytical value and transparency of the site.

Thus, in terms of ensuring transparency, the platform has significant shortcomings, particularly in terms of the completeness, comprehensiveness, and comparability of statistical data, as well as the platform lacks the normative legal basis for its operation and does not publish user satisfaction results.



Recommendations

1. We recommend publishing the legal basis for the platform's creation and management, within the "About" section of the main menu.
2. We recommend ensuring the publication of user satisfaction results in an anonymized and aggregated format. This would enhance the platform's transparency. In this regard, the approach used on hartak.am serves as a best practice.
3. Publish complete statistical data by also making available data from previous years. This would allow for tracking trends in draft publications and conducting comparative analyses. If possible, also make statistical data available on the number of proposals/comments submitted. Currently, the number of visits is available on a monthly basis, which cannot yet be considered real participation data.

7. Navigation and Technical Standards

The assessment of the platform's navigation and technical aspects is based on the Armenian Digital Service Design [Standard](#), "[Henaket](#)" Design System).

Our research indicates that the platform partially complies with the Armenian Digital Service Design Standard, providing certain capabilities for viewing drafts and enabling public participation.

The e-draft.am platform offers clear navigation, a simple interface, a uniform font and harmonious color schemes. It has a simple, user-friendly interface where colors are harmonious, do not overload attention and support reading comfort. The font is consistent and legible across all sections of the platform, which contributes to the straightforward comprehension of the site's content.

The platform has a short, easy to remember address, ensures accessibility to key services from the homepage and provides clear navigation for quick access to important sections. Content is presented in accessible language, applying the "one idea per paragraph" principle, which optimizes reading speed and clarity.

The platform ensures sufficient color contrast between text and background, facilitating reading. Nevertheless, the research identified a number of issues that could slow down user experience. While the platform allows copying, printing and downloading draft texts, there is no option to download the draft's summary sheet (and the Justification document can only be downloaded from the Project page, not from the Justification section). In some cases, the summary sheet of proposals can span dozens of pages and enabling its download could ease the user's task and promote their engagement.

The platform has a search system that provides accessibility, allowing searches by full words, phrases or sentences. However, the search system does not always match queries accurately and does not always understand inflected word forms (it does not recognize the root of words well).

Furthermore, it often fails to recognize words with even a single-letter typo.

The team conducting the platform assessment had an online meeting with representatives of the relevant subdivisions of the Ministry of Justice on December 24, 2025, and presented the preliminary assessment results. During the discussion, the Ministry's experts indicated that the platform reform process is ongoing and that a significant portion of the identified issues, particularly those related to statistics, navigation and accessibility, will be resolved. The Ministry plans to implement measures in 2026 to address another set of issues (e.g., the need to activate certain buttons, clarifying the presentation of the technical support section, expanding the FAQ, publishing a privacy policy and justifying the data required for registration). Solving some issues will require a relatively longer timeframe. However, according to the Ministry, the main phase of platform modernization is planned to be completed within 2026.

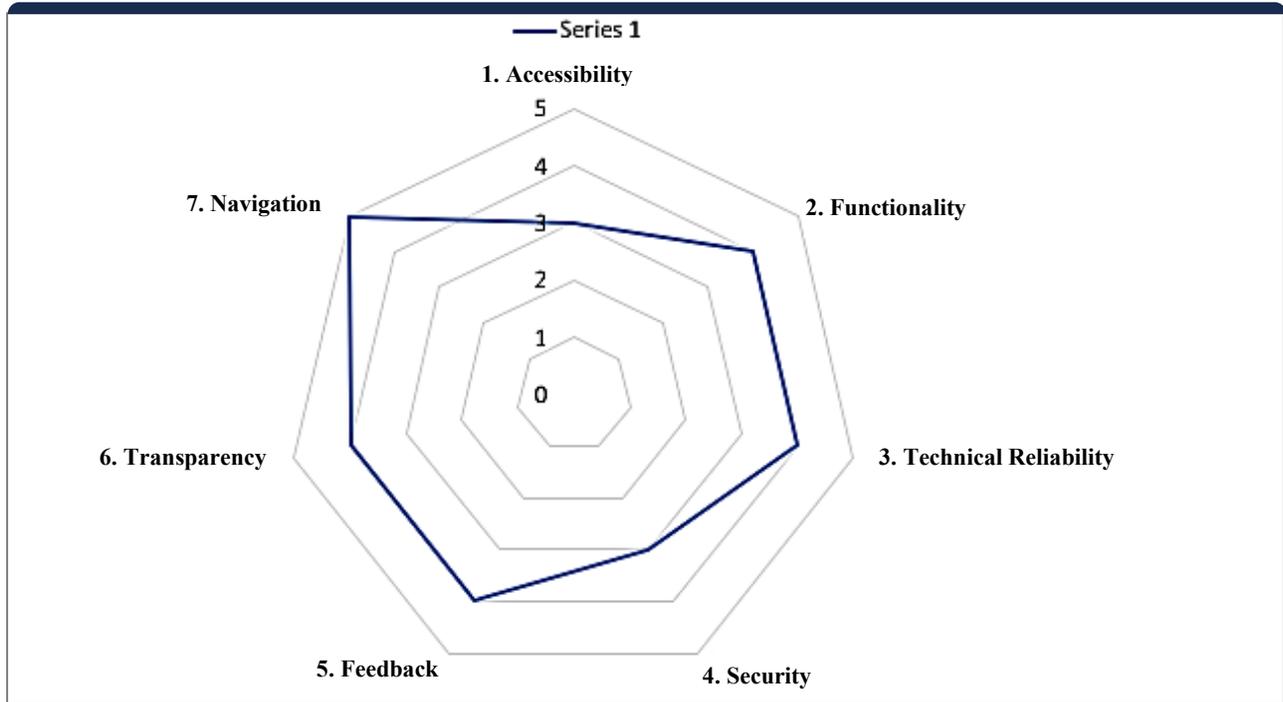
Thus, although the platform has a well-designed and user-friendly navigation system, it still partially complies with the Armenian digital service design standard. Some technical gaps have been noted in the search and document download process.



Recommendations

1. It is necessary to ensure the ability to download and print draft summary sheets, and to make the Justification document downloadable from within its own subsection as well.
2. The platform's search function can be improved by incorporating the ability to recognize common typos and acceptable spelling variations in words.

In summary, the radar diagram depicting the e-draft.am platform's assessment results appear as follows:



The diagram illustrates that the weaknesses of e-draft.am are associated with ensuring the accessibility of the platform and personal data protection. Specific issues have also been highlighted regarding feedback and transparency, such as insufficiently timely and comprehensive responses, inadequate digital support tools, the absence of user evaluation mechanisms and the lack of a Privacy Policy and an Accessibility Declaration. The platform's strongest aspect is its well-developed and user-friendly navigation system.

E-DRAFT.AM ASSESSMENT

E-draft.am: Key Issues

**Accessibility Gaps**

- Guide videos lack captions or sign language translation
- No Accessibility Declaration published
- Excessive mandatory registration data (gender, country)
- FAQ section severely limited—only one Q&A pair
- Documents available only in Armenian

**Data Protection Concerns**

- **No Privacy Policy published**
- Mandatory fields violate proportionality principle
- "Gender" and "Country" required without justification
- Violates Personal Data Protection Law requirements
- Limits user trust and platform transparency

**Feedback Mechanism Problems**

- "Report Technical Issue" tool requires registration
- Misleading navigation—directs to legislative proposals
- No user experience evaluation tools
- Proposal status tracking unclear or delayed
- "Accepted for consideration" status lacks clarity

**Transparency Issues**

- No responsible official contact details published
- Legal basis documents not published
- User satisfaction results unavailable
- Statistics limited to one year only
- No comparative or dynamic analysis possible



Note: The Ministry of Justice reports that platform improvement is ongoing, with WCAG 2.1 AA compliance expected in 2026.

24/45

Full Compliance

13/45

Partial Compliance

6/45

Non-Compliance

2/45

Not Applicable

E-DRAFT.AM ASSESSMENT

E-draft.am: Recommendations

1 Expand FAQ Section

Reorganize and improve the FAQ section with additional Q&As to guide and support users. Make it accessible from the main page.

2 Video Accessibility

Add captions to guide videos for full accessibility. Present the User Guide in visual formats with interactive or infographic elements.

3 Technical Support

Establish a dedicated technical support section with clear contact information and expected response timeframes.

4 Privacy Policy

Publish a comprehensive Privacy Policy on the main page, written in simple language, covering data collection, storage, usage, and user rights.

5 Registration Data

Revise mandatory registration data requirements, removing "country" and "gender" fields or providing clear justification for their necessity.

6 Multilingual Support

Enable automatic browser translation activation for non-Armenian speakers or add hints in English and Russian versions about using browser translators.

★ Priority Recommendations for User Engagement**7 Proposal Status Clarity**

Ensure users receive timely, comprehensive information about proposal acceptance/rejection with detailed justifications. Technically restrict "accepted for consideration" usage without accompanying explanations.

8 AI-Powered Support Tools

Implement modern digital support solutions including AI-powered tools to provide users with fast and effective technical assistance and information about legislative drafts.

E-REQUEST.AM ASSESSMENT

Unified Platform for Online Requests

[E-request.am](http://e-request.am) unified platform for sending online requests was established to promote accountability and transparency in public administration and is designed to facilitate electronic document circulation. The platform was created in 2018, with its legal basis for operation established by Government Decision No. 524-N of April 26, 2018. Until October 2019, the platform was operated by the Ministry of Justice of the Republic of Armenia; currently, pursuant to an order from the Prime Minister of the Republic of Armenia, platform maintenance is carried out by "EKENG" CJSC.

This platform serves as the official unified electronic platform for submitting information requests, applications, or complaints to state bodies that are information custodians, created on the single-window principle.

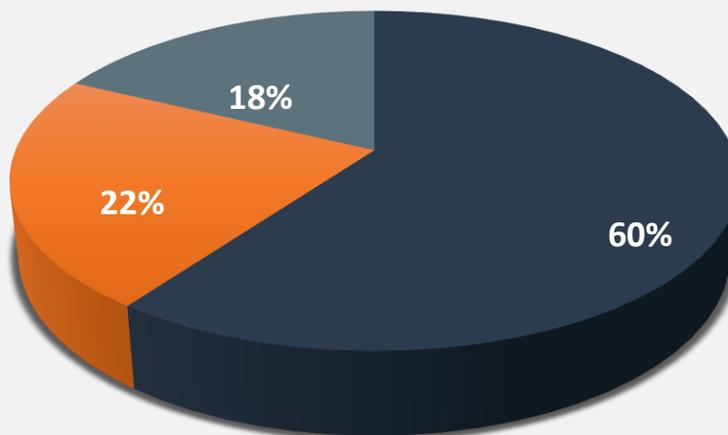
Through the platform, without visiting a state body, it is possible to:

- Send online requests, applications, complaints, or other correspondence to 220 state bodies and subordinate institutions
- Track the status of submissions using a tracking number
- Receive responses to submissions directly through the platform or at a specified email address
- Access all correspondence sent through the platform and its official responses in a personal virtual archive
- Schedule appointments to access public services or meet with officials.

The idea for creating the unified platform for electronic inquiries, e-request, was authored in 2016 by Shushan Doydoyan, President of the Freedom of Information Center. Utilizing the proposed idea and its implementation concept, the Ministry of Justice of the Republic of Armenia, with the support of the European Union, initiated the creation of the unified platform for electronic inquiries.

The research revealed that out of the total 45 assessment criteria, the platform demonstrates full compliance with 27 criteria, partial compliance with 10 and non-compliance with 8.

e-request.am



■ Compliance: 27 criteria

■ Partial: 10 criteria

■ Non-compliance: 8 criteria



E-request.am Assessment

1. Accessibility and Ease of Use

The first group of assessment criteria is the level of accessibility and ease of use. These criteria help determine how easy it is for a citizen to utilize the services provided by the platform.

Overall, the platform aligns with the fundamental principles of accessibility and ease of use. However, there are certain technical and content-related issues that limit users' ability to utilize the platform fully.

The system's name, "Unified Platform for Electronic Inquiries," while clear and descriptive, does not fully represent the scope of the platform's functions. It could cause confusion among uninformed users, as the name only refers to "inquiries," whereas the platform can also be used to submit applications and complaints, as well as to schedule visits to state bodies.

The platform's address, e-request.am, is also problematic. For English speakers, this address is simple, comprehensible and meaningful. Thus, for those who do not know English, it is unclear and difficult to see a conceptual link between the address and the platform's purpose. It should be noted that the much easier to remember address www.dimum.am also directs users to the same platform.

The platform's main page, the general service description section, the FAQ and the statistics section can be accessed without prior registration. However, registration is mandatory to use the platform's services.

It is acceptable that registration serves both a security purpose and helps simplify the process of formulating a request/application by enabling the automated entry of legally required data. It must be noted that the mandatory nature of some data required for registration is not justified, as they are not required by law. To register on the platform, a user must specify which country's citizen they are (choosing from 195 proposed options), then enter their name, surname, physical address, contact email and phone number, as well as date and year of birth and the serial number of their identity document. Consequently, to register on the platform, the user is forced to input a rather large volume of personal data without proper justification. The mandatory requirement for additional data beyond the personal data stipulated by law for sending an application, request or complaint violates not only the principle of lawfulness but also the principle of proportionality in personal data processing, according to which the means to achieve the lawful purpose must be suitable, necessary and moderate.

It should also be noted that the state body operating the system lacks mechanisms and tools to verify the accuracy of the entered data.

Practical testing suggests that the primary link for system identification is the email address, because even with different other data, if the user's name and email match, the other data are considered secondary.

Although a general description of services is not present on the site, explanatory tooltips appear when hovering over each active button during all service stages. These brief descriptions hint at the specific button's purpose, helping the user navigate and understand the next step. As a result, the

platform guides the user's actions step-by-step. A general description of services is also available in the "[Frequently Asked Questions](#)" (FAQ) section.

The FAQ section is accessible at the bottom of the site and is also available without logging into the platform. The questions and answers presented here are simple, accessible and guiding. The answers provided are concise, mostly in text, but if additional questions arise, the user has no mechanism to contact the service organization.

All fields on the platform have visible and understandable labels. Special phones or computers are not required to use the services offered by the platform. Considering that the platform offers accompanying instructions at each stage of service delivery, no special knowledge or skill is necessary to use the platform.

The platform does not publish an Accessibility Statement. Observing the platform, we recorded that it is not practically adapted for people with disabilities. The site does not display modes for contrast adjustment or text size changes for users with low vision. Under the second question in the platform's [FAQ section](#), there is a video illustrating the registration process. This is a good visual solution for users with hearing difficulties but limits the possibilities for users with vision problems, as the video has neither a text description nor audio. These circumstances can limit equal access to information.

Data published on the platform generally meet open data criteria: they are machine readable, accessible and suitable for free use and reuse, and they are accessible for viewing on the platform. However, in some cases, conditions necessary for downloading and working with the data are not provided. For example, data in the "[Statistics](#)" section are presented in image format, but when attempting to download or copy, the data becomes distorted. Consequently, the platform does not offer the ability to download the presented data in any format.

Accessible content on the platform is free of complex professional terminology; texts are presented in an understandable, explanatory style. There are almost no complex professional terms; domain-specific content is accompanied by simple explanatory text, ensuring comprehensible content for citizens.

All sections of the platform are available in 4 languages: Armenian, Russian, English and French. Only the statistics section is not translated; when accessing it, a message in the selected language always informs that it is still under development.

The platform lacks a technical support section. Although detailed information on usage is available in the [FAQ](#) and clear instructions exist in various parts of the site, including for potential issues, the user has no means of feedback to report technical problems or receive support if needed. While in practice one can call EKENG and receive technical support, the site contains no guidance on this, and EKENG's phone number is also missing.

The platform is applicable not only to citizens of the Republic of Armenia but also to citizens of other countries. The user indicates their citizenship during registration by choosing from the proposed options.

The results of the platform's accessibility assessment show that for users without special needs, e-request.am has structural and functional accessibility. However, from the perspective of people with disabilities, the page has accessibility issues: screen readers cannot perform logical navigation and main buttons and forms do not work with keyboard controls. This limits the ability of users with

vision and mobility issues to use the site and impairs the accessibility of the platform's core functions.

The platform also lacks text alternatives for non-text content; sufficient color contrast is not ensured and information about errors and input fields is not accessible to screen readers. Videos lack appropriate alternative formats, and statistical data are presented only as images. Consequently, the site does not meet the minimum requirements of the Web Content Accessibility Guidelines (WCAG 2.1) and requires comprehensive redesign through continuous testing involving users with disabilities.

As of January 1, 2026, the number of registered users on the Platform is about 150,000. During 2025, 237,000 requests were sent through the Platform.

Considering the fact that the vast majority of users of the platform are from Yerevan, the accessibility of the platform and the low level of use among the regional population remains a systemic problem. As the [statistics](#) published on the platform show, in the last year there have been no users at all from Aragatsotn, Vayots Dzor and Tavush regions.

Overall, in terms of accessibility and ease of use, the platform has significant problems: it does not meet international accessibility standards, is not sufficiently adapted for people with disabilities, accessibility tools are missing, and some materials are presented only in a visual format. Due to low public awareness, the main users of the platform are residents of Yerevan.



Recommendations

1. Considering the uncommon usage and complex spelling of the English word "request" for the Armenian public and the fact that the www.dimum.am address is already operational and more memorable for wide Armenian-speaking audiences, it is advisable to promote it as an equivalent address. The platform should indicate this alternative, more Armenian-sounding address in various sections to enhance accessibility for Armenian users.
2. It is recommended to review the list of personal data required for registration. Fields that are not mandated by law (such as date of birth, passport/ID card number and validity period) should either be removed or made non-mandatory. In both cases, the requirement for this data must be properly justified, at minimum within the registration policy. During registration, the purpose for which this data is needed must be clear to the user. These changes will reduce barriers to entry, increase trust in the platform, and ensure the platform's compliance with personal data processing rules and principles.
3. It is recommended to use the full phrase "Frequently Asked Questions" either instead of or alongside the abbreviation "FAQ." This will help inexperienced users quickly understand the section's purpose and, if necessary, find it easily via the search system. It is also desirable to ensure a feedback mechanism or a link to a feedback channel within the FAQ section for all cases where a user does not find an answer to their question.





Recommendations

4. It is recommended to create a separate technical support section on the platform, or at the very least, publish contact means for reporting technical issues and obtaining support. If a dedicated phone number for the expert performing this function does not exist, it is necessary to indicate that one can contact EKENG and provide the corresponding contact details. This will reduce user uncertainty in case of problems and increase trust in the platform.
5. It is necessary to ensure the platform's compliance with the AA level of the Web Content Accessibility Guidelines (WCAG) 2.1. This specifically involves providing a toolkit for people with disabilities to access the platform and ensuring the usability of the complete service chain.
6. Parallel to implementing accessibility criteria, it is necessary to publish an Accessibility Statement on the platform. This will clarify for users the extent of the platform's compliance with accessibility standards, what solutions are available, and which ones are still lacking.
7. To promote platform usage among regional populations and raise awareness about the platform, it is recommended to implement a targeted information campaign presenting its utility and convenience for regional users. For this purpose, it is advised to actively utilize hybrid models and develop cooperation with regional local organizations to improve awareness and engagement among regional populations. The use of social media as accessible channels for disseminating information can also yield positive results.

2. Functionality and Service Quality

This group of criteria helps assess whether the platform solves a citizen's problem or merely provides information. These criteria facilitated in analyzing the degree of digitization of services, opportunities for interactive engagement with users, and the quality of services delivered online.

This set of criteria allows for assessing whether the platform practically addresses a citizen's specific problem or limits itself to merely providing information. Within the scope of the second assessment group, the level of service digitization, opportunities for interactive engagement with users, as well as the effectiveness and quality of online services delivered through the platform were analyzed.

The platform's level of digitization is generally high and covers all stages of sending a communication. A user can, without visiting a state body, send an online request for information, an application or a complaint, track the status of their communication, receive a response, create an online repository for their communications and schedule appointments to use public services or meet with an official.

Thus, the platform is partially compliant with Service Delivery Level 4 (full digital service delivery without a visit to a state body).

A user can track the entire progress of their communication both through a personal repository and via a unique tracking number. It is important to note that using the "Track Your Case" service does not require logging into the system's personal account. This means that any person who has the communication control number can freely check its status and if wanted, download the inquiry and

its response letter. In other words, it is possible to make data related to a specific communication accessible to another person without transferring additional information if desired.

After accessing the relevant window to track the inquiry, the following data can be seen:

- The document (and the option to download it if necessary)
- The date and specific time the communication was entered
- The deadline for the response
- The status of the document (in progress or already completed)
- The name of the official currently working on the document
- Contact details to reach that official: email address and phone number.

It should be noted that this data is not available for all organizations. In some cases, only communication and its entry details are visible. Sometimes only an email address is provided, with no phone number. More rarely, but it happens, that information about the inquiry's progress is almost completely absent; only the inquiry and the data confirming its entry are visible. The disparity in data presentation is evident both during the processing of the response and after a response is given. In the case of some bodies, even after receiving a response, the user clearly sees their sent communication, the entry date, the response deadline, the date of the response letter, its official number, and the response letter itself on a separate line (e.g., the history of the FOICA's request to the State Register Agency of Legal Entities, tracking number: MJ23-53BD-C92A-4BD1). Although, in some cases, the data visible to the user is severely limited. For example, after receiving a response from the Staff of the Prime Minister, the user only sees their own document, the entry date and status information. It must also be noted that in this body's case, the document folder contains not only the user's document but also the response letter, yet there is no indication hinting at this, as the folder is simply labeled "*Click here to view your document,*" which we believe does not in any way suggest that the response letter provided by the state body can also be found there (e.g., the history of an FOICA's request to the Staff of the Prime Minister, tracking number: GVB7-6832-CFC9-62D8).

The platform does not allow for the entry of interim responses in the case of inquiries. Consequently, tracking the progress of a document solely through the platform can lead to misunderstandings. Some organizations send interim documents in accordance with legally established procedures (e.g., requesting additional time), but they do not make any note of this on the platform to avoid closing the circulation. As a result, the user sees the interim document exclusively via email.

In some cases, differences are also observed in the approach to storing response letters. There are organizations that, after providing a response, place it under a special "*Response Letter*" line, while in the case of others, the letter may appear in the same folder as the user's original inquiry.

Even such minor differences make the platform unpredictable and reduce user trust, as it highlights that state bodies may adopt discretionary approaches in publishing the data.

It is important to note that the organization servicing the platform has no direct influence over the volume of data entered by individual state bodies. However, from the user's perspective, these varied approaches are typically attributed not to individual bodies but to the platform itself, thereby diminishing trust in the platform.

Thus, the platform practically ensures a high level of service digitalization and enables citizens to submit inquiries, applications, or complaints without visiting state bodies in person, track their progress, and receive responses, bringing it close to the fourth level of complete digital service. Users can monitor the status of their correspondence both through their personal archive and via a tracking number; however, the volume and presentation format of data provided by different state bodies vary significantly. Some institutions adequately present the complete history of correspondence and responses, while in other cases the information is limited or difficult to access, and there is no mechanism for providing interim responses altogether. These inconsistent approaches make the platform unpredictable, reduce user trust, and create the impression that data publication depends not on unified rules but on the discretion of each individual body, which overall negatively affects the perception of service quality.



Recommendations

1. It is recommended to establish and technically mandate a minimum list of data that must be reflected in the "Track Your Case" section for all organizations, regardless of their internal regulations. In specific cases where deviation is properly justified, this justification must be presented to the user. This will prevent situations where users accessing the same service receive different scopes and quality of data accessibility without proper justification.
2. It is recommended to implement the technical capability within the platform to enter an interim response or current notification. This would allow state bodies to log on the platform those instances where interim communication is sent in accordance with legally established procedures (e.g., requesting additional time). As a result, the user would gain a complete picture of the communication's progress directly on the platform without relying on email, thereby reducing the risks of misunderstanding and distrust.
3. It is recommended to enforce uniform data publication requirements for state bodies. Through technical solutions, it is necessary to restrict the possibility of non-publication or partial publication of data, eliminating discretionary approaches. This will increase trust in the platform and ensure equal conditions for all users.
4. It is recommended to establish a clear and mandatory procedure regarding the entry onto the platform and the placement of responses provided by the state body. This will help, regardless of user preferences, to receive the response via email and maintain a complete package of document circulation. This approach will also help avoid technical issues associated with email.
5. It is recommended to create a mechanism within the personal repository that, when viewing the list, allows users to easily identify which communications have received a response and which have not. This will help users see which communications are still in progress without additional effort.
6. It is recommended to make available on the platform also guides on how to use the platform, which may be useful for the user. A similar example is the [online Toolkit](#) "How to Use the Unified Platform for Electronic Requests" developed by the Freedom of Information Center.

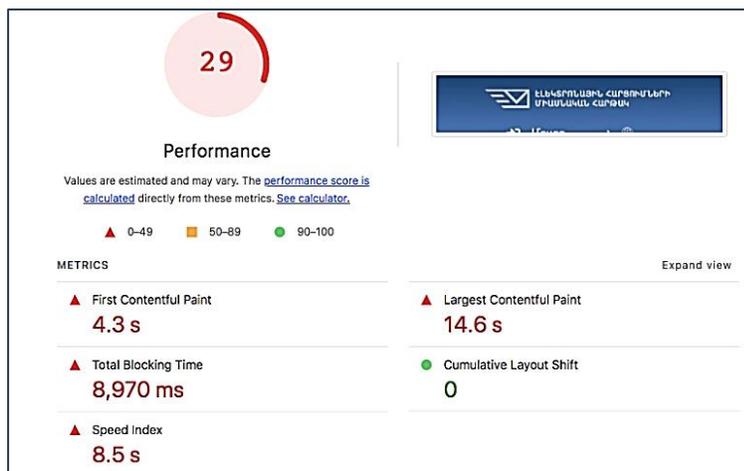
3. Technical Reliability and Speed

This group of criteria helps determine the reliability and speed of the platform's operation.

This set of criteria helps determine the reliability and speed of the platform's operation. Our observations indicate that the platform generally operates ideally at all hours of the day. No outage reports from other organizations or individuals have been recorded.

Rarely there have been instances where the platform did not allow sending documents to a particular organization. Typically, in such cases, the EKENG team has resolved the issue within a short time.

Launching the site on different browsers (Chrome, Safari) does not cause problems.



Speed tests of the platform's loading conducted as part of the assessment have shown that delays in accessing the platform are recorded at different times of the day. A check using Google Lighthouse (see image below) revealed that in some cases, the platform's loading speed can be up to 8.5 seconds. The loading speed of individual pages on the platform is not stable and depends on usage peak times.

Thus, the platform is generally complete in terms of technical reliability, but in certain cases issues are observed with download speed.

4. Security and Data Protection

This group of criteria helps assess the security level of using the platform.

The website employs an HTTPS security system; external observations have not recorded issues.

The scope of data required for registration on the platform exceeds what is necessary to use the given service, which violates the principle of proportionality in personal data processing.

The platform has a [Personal Data Processing and Privacy Policy](#), published in the "[About the Platform](#)" section of the site. This section details the purposes for collecting personal data processed by the platform, the approaches to their processing and also directs users on where to apply if they believe their rights regarding personal data protection have been violated in any way.

It is noteworthy that this section clearly states that "EKENG" LLC bears no responsibility for the policies regarding the use of personal data transferred to other bodies through the Platform.

The only inconsistency recorded under this section is the violation of the principle of proportionality in personal data protection, due to the volume of mandatory data required for registration on the platform. The mandatory requirement for additional data (country, serial number of the identification document, etc.) in addition to the personal data specified by law for sending an application, request

or complaint violates the principle of proportionality of personal data processing, according to which the means of achieving the legitimate purpose of processing personal data must be appropriate, necessary and proportionate.

Thus, there is a fundamental problem in terms of personal data protection on the platform. During registration, a wider range of data is required from the user than is actually necessary to use the service, which contradicts the principle of proportionality of data processing. Although the platform has a published privacy policy, which describes in detail the purposes of data collection and the rights of users, it is emphasized that the platform is not responsible for the further use of data transferred to other bodies.



Recommendations

1. It is necessary to review the required volume of personal data for user registration as needed, aligning it with the principles of personal data processing and the requirements of the RA Law on Personal Data Protection.
2. It is recommended to review the list of personal data required during registration and remove fields that are not mandated by law (date of birth, passport/ID card number and validity period) or make their entry non-mandatory. In both cases, the requirement for this data should be properly justified at least in the registration policy; at the registration stage, the user should understand for what purpose this data is needed.
3. It is necessary to review the platform's privacy policy and clearly define the scope of responsibility also for cases when data is transferred to other state bodies. The user should clearly know who the data processor is and from whom he can demand protection of his rights. These changes will increase trust in the platform and ensure the platform's compliance with the rules and principles of personal data processing.

5. Feedback, Engagement and Support

This group of criteria helps assess the extent to which citizen feedback and support during the platform usage process are ensured.

All active buttons throughout the platform are accompanied by supporting content and explanatory instructions. The platform lacks tools specifically implemented to support users, such as a hotline, online chat (e.g., chatbot) or a dedicated email address.

Although the platform allows for evaluating specific service attributes at the moment of sending a communication, there is no option to send additional comments or feedback. The user also has no means to report technical issues encountered while using the platform.

The mechanism for evaluating the user experience is incomplete. After sending an inquiry, the platform offers only a limited evaluation possibility through closed-ended questions. In some cases, after receiving responses, the user can indicate via "Yes," "No," or "Partial" buttons whether the received answer was satisfactory and similarly, with a "Yes" or "No" response, record whether the answer was received within the legally prescribed timeframe. However, there is no way to provide an overall assessment of the website. There is also no opportunity to submit opinions or observations beyond the suggested answers.

This issue is particularly acute considering that the platform does not offer any feedback mechanism.

Thus, the platform is considered deficient in terms of providing feedback and support to users. Its feedback and support system is restricted and fails to guarantee true participation.



Recommendations

1. It is recommended to implement at least one permanently visible and easily accessible user support tool on the platform, such as an online chat or a dedicated technical support email address. The presence of such a tool will allow users to quickly receive clarifications, guidance or support while using the platform without searching for other sources. In the case of a hotline or email address, it is advisable to clearly specify their function (technical issues, operational questions, general consultation) as well as approximate response times. The technical support tool should be accessible without additional complicated processes and should, as much as possible, avoid requiring redundant data entry. This will not only support the specific user but also systematically record and analyze technical issues, ensuring continuous improvement of the platform's quality.
2. It is recommended to expand the possibilities for user experience evaluation by providing various assessment options and ensuring this evaluation mechanism is applicable for each communication.
3. In addition to evaluations via closed-ended questions, it is recommended to introduce an open text field allowing users to submit additional opinions, observations or suggestions. Free-format feedback can provide qualitative data that is impossible to obtain solely through predefined answers.
4. Considering the platform currently lacks practical feedback mechanisms, it is recommended to develop and implement a clear mechanism for ensuring feedback. This could also be part of a general user communication system. Implementing such a system will increase trust in the platform and create a genuine sense of user participation and engagement.
5. If possible, we recommend activating SMS or Push Notifications for cases where a response to an application or inquiry is received, with content such as: "*The response to your request is ready.*"

6. Transparency

This group of criteria helps assess the level of transparency ensured by the platform.

From the platform's homepage, it is difficult to immediately discern which state bodies manage the platform or to obtain primary contact means for them. The homepage only mentions the "*Government of the Republic of Armenia.*" Though, the creating and operating bodies are listed in the "About the Platform" section.

Contact information for feedback such as a phone number, email address or details of a contact person, is not available on the site.

The website provides information regarding the legal acts enabling the platform's operation. The "About the Platform" section states: "*The legal basis for launching the Unified Platform for Electronic Inquiries is established by Decision No. 524-N of the Government of the Republic of Armenia dated April 26, 2018.*"

User opinions and/or satisfaction results regarding the platform and the individual services presented are not accessible on the site.

The platform has a "[Statistics](#)" section, accessible without login. Upon entering the section, a warning "Demonstration version soon" appears, implying that the presented section does not yet correspond to the fully planned version. Overall, the statistics section offers very limited data. The presented statistics consist of four main parts containing only a few aggregated datasets. Users cannot generate or obtain new data or custom statistics based on their own criteria.

The first interactive graph in the section shows the numerical representation of letters sent by region, but the data refers exclusively to the last one-year period. This means the statistical data selection changes daily, showing only the last year's data from that particular day.

Furthermore, there is no functionality to view data from previous days or years, nor are comparative numerical representations available. The second graph displays the number of letters sent by day. Here, users can see how many communications were sent each day starting from May 20, 2021. This graph does not allow users to combine, sum, or perform other types of analysis on the daily data based on selected criteria.

The third diagram in the section lists the top ten bodies receiving the most documents and the number of letters (regardless of type) they have received over the past year.

The data in the three subsections mentioned above refer to total letters without clear differentiation (e.g., which are requests, applications, or complaints). Another graph does allow viewing the distribution by communication type, but again, this data pertains to the last one-year period and thus changes daily.

The last graph also lists the top ten bodies receiving a specific type of communication and the corresponding quantity. However, there is no option to download or copy the statistical data as images or in other formats. There is no statistical data related to site visit tracking.

It is also important to note that while the platform allows users to create a personal repository and track their document flow, there is no mechanism to download this entirely or obtain statistical data related to the archive.

Thus, the platform demonstrates shortcomings in transparency, as it provides no means of communication with the responsible public body and fails to disclose user satisfaction outcomes. User access to statistical data is restricted: the available figures are incomplete, non-comparable, and exclude prior years. In addition, the "Statistics" section displays information as images, which cannot be downloaded or copied without distortion, effectively preventing users from retrieving the data in any format.



Recommendations

1. It is recommended to implement a mechanism on the platform for collecting and publishing user opinions and satisfaction results, for example, in summarized statistics or anonymous rating format.
2. It is recommended to expand the scope of data presented in the “Statistics” section by extending the temporal range, enabling users to review not only the most recent year but also previous years and specific time periods. Additionally, the platform should provide access to the total number of entries submitted annually, disaggregated by year.
3. At the same time, it is advisable to introduce tools for filtering and grouping statistical data, enabling users to select the type of data (inquiry, application, complaint) and to compare and analyze information by day, month, or year.
4. It is recommended to provide the ability to download and reuse statistical data, which would enhance the practical applicability and transparency of the data.
5. If possible, it is suggested to create a mechanism for users to obtain statistical data regarding the communications in their personal repository.
6. It is recommended to include statistical data related to appointment scheduling on the platform. This would allow for a comprehensive understanding of the volume and effectiveness of all services delivered through the platform.

7. Navigation and Technical Standards

The assessment of the platform's navigation and technical aspects is based on the Armenian Digital Service Design [Standard](#), “[Henaket](#)” Design System).

The platform is straightforward for the user; the colors are harmonious. The text and background contrast is chosen so that texts on the platform are readable for users without additional effort. The font used on the platform is consistent and/or compatible, and its size varies across sections as needed to ensure readability. There is no specific tool for changing the text size; it can only be modified through the user's own device (phone, computer).

Important sections leading to guiding parts of the site are permanently accessible even without logging in. Key services are visible from the platform's homepage, but to use them logging into the system is required.

It should be noted that while the platform allows archiving and storing all inquiries and responses sent through it, it does not permit downloading them for offline use.

The content presented on the site is not overloaded; ideas are expressed in accessible, understandable language, and relatively long texts are presented following the “one idea, one paragraph” principle.

Overall, the platform allows to copy, print, and download published data and materials. The [“Statistics”](#) section is an exception.

The platform does not have a general search system. Nevertheless, search tools placed within the scope of services respond quickly and allow finding the necessary state body. The search system does not have a mechanism for conducting searches based on data presented within documents.

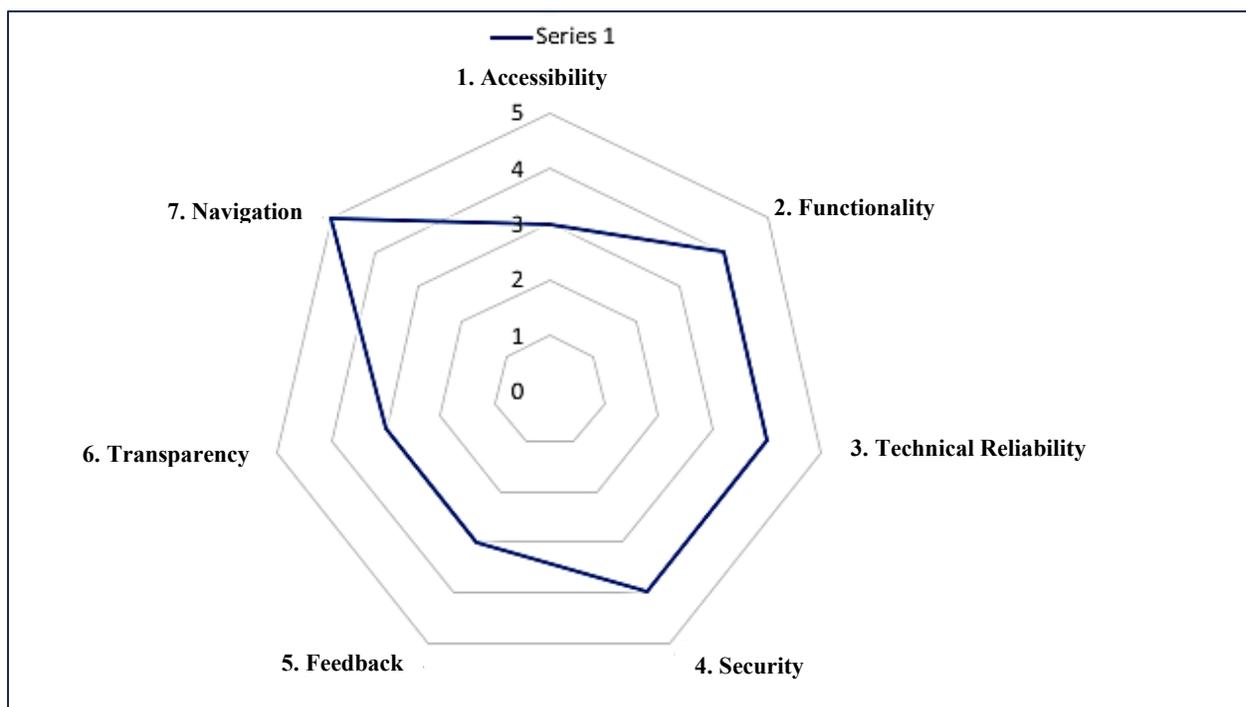
Thus, from the perspective of ensuring navigation, the platform is assessed as fully compliant.



Recommendations

1. It is recommended to ensure the multilingual accessibility of the "Statistics" section so that it aligns with the platform's overall language policy and does not restrict non-Armenian-speaking users' access to data.
2. It is recommended, if possible, to expand the existing search system on the platform to allow searches not only within service or state body lists but also within documents, the content of responses and inquiries, and other materials published on the platform.

In summary, the radar diagram of the evaluation results of the e-request.am platform is presented as follows:



The diagram shows that the weakest aspects of e-request.am are linked to the criteria of accessibility, transparency and the user feedback provision. The platform's feedback and participation tools are weak: absence of response, insufficient digital support tools, absence of user evaluation mechanisms, absence of user evaluation results, and non-compliance with the principle of proportionality in personal data protection. The strongest aspect of the platform is its well-designed and user-friendly navigation system.

E-REQUEST.AM ASSESSMENT

E-request.am: Critical Issues



The platform **does not comply with WCAG 2.1 accessibility standards**. Screen readers cannot perform logical navigation, and main buttons and forms do not work with keyboards, effectively excluding users with visual and mobility impairments.

**Excessive Data Requirements**

- Registration requires country (195 options), name, address, email, phone, birth date, ID document number
- **Violates proportionality principle**—excessive data without legal requirement
- No verification mechanism for entered data accuracy
- Creates barriers to entry and reduces trust

**Inconsistent Data Display**

- Different state bodies provide varying data volumes
- Some show only basic info; others provide full history
- No mechanism for intermediate responses
- Creates unpredictability and reduces trust

**Missing Support Systems**

- **No technical support section** or contact mechanisms
- No hotline, online chat, or dedicated email address
- Users cannot report technical issues
- No guidance on where to seek help

**Regional Digital Divide**

- **Vast majority of users are from Yerevan**
- Aragatsotn, Vayots Dzor, and Tavush regions had **zero users** in past year
- Low awareness in regional populations
- Systemic accessibility problem for regional residents

27/45

Full Compliance

10/45

Partial Compliance

8/45

Non-Compliance

E-REQUEST.AM ASSESSMENT

E-request.am: Recommendations

1 WCAG 2.1 Compliance

Ensure full WCAG 2.1 AA compliance by providing accessibility toolkits for users with special needs, enabling complete service chain usability. Publish an Accessibility Declaration.

2 WCAG 2.1 Compliance

Ensure full WCAG 2.1 AA compliance by providing accessibility toolkits for users with special needs, enabling complete service chain usability. Publish an Accessibility Declaration.

3 WCAG 2.1 Compliance

Ensure full WCAG 2.1 AA compliance by providing accessibility toolkits for users with special needs, enabling complete service chain usability. Publish an Accessibility Declaration.

4 Revise Registration

Remove non-legally required fields (birth date, ID number) or make them optional. Provide clear justification for all required data in the registration policy.

5 Technical Support

Create a dedicated technical support section or publish contact mechanisms. If no dedicated phone exists, direct users to EKENG with clear contact information and expected response times.

6 Standardize Data

Establish minimum data requirements for "Track Application Status" section across all institutions. Implement technical solutions for intermediate response entry.

Additional Priority Improvements

7 Feedback Mechanisms

Expand user experience evaluation with rating options for each letter and open text fields for additional comments.

8 Alternative Address

Promote www.dimum.am as an equivalent, more memorable address for Armenian-speaking users alongside e-request.am.

9 Notification System

Implement SMS or Push notifications when application responses are ready: *"Your letter response is ready."*

KEY RECOMMADATIONS

Strategic Directions for Improvement

The key issues identified indicate that the development of Armenia's public digital service delivery platforms requires a systemic approach to ensure high-quality public service delivery. Based on the assessment outcomes, a series of comprehensive recommendations are drawn up aimed at improving and advancing Armenian digital service platforms. Note that in addition to these recommendations, each platform has its own specific issues, for which concrete suggestions have been made in the corresponding sections.

1. **Alignment with Unified Digital Standards:** Digital service delivery platforms must undergo comprehensive reform to ensure strict adherence to Armenia's Unified Digital Service Design [Standard](#). This requires full implementation of digitalization principles and digital architecture [standards](#), thereby eliminating fragmentation and ensuring harmonious, efficient operation across all state systems.
2. **Ensuring Inclusive, Interoperable, and Effective Digital Platforms:** Inclusivity demands that digital services remain accessible to all citizens regardless of geographic location (regions and Yerevan), age, social status, or digital literacy level. Failure to address this will deepen the digital divide and isolate segments of society from public services. To achieve this, public digital platforms must achieve full compliance with WCAG 2.1 international accessibility standards. Accessibility tools must be visible, active, and functional across all pages, accommodating the needs of diverse user groups, including those with visual and functional impairments. Both platforms must align with the [Web Content Accessibility Guidelines](#) (WCAG 2.1) and publish accessibility declarations.
3. **Regional Outreach and Engagement:** To stimulate platform usage among regional population and raise awareness, we recommend implementing targeted information campaigns highlighting platform utility and convenience for regional users. This should incorporate hybrid engagement models and foster partnerships with regional local organizations to enhance awareness and participation. Leveraging social media channels as accessible information dissemination tools can also harvest significant results.
4. **Ensuring Transparency:** Public digital service delivery platforms must enhance transparency by clearly presenting their legal foundations for establishment and operation, responsible state bodies, accountable officials, and contact mechanisms. Platforms must also publish user satisfaction results.
5. **Functional Feedback Mechanisms:** Feedback mechanisms must constitute genuinely operational systems. Users must receive substantive, timely, and comprehensive information. Feedback-related challenges can be addressed through artificial intelligence solutions. Further enhancement of these digital platforms must integrate AI tools to ensure rapid, substantive user engagement; complete, comparable, and updated statistical data; and entirely new quality in state-citizen interaction, platform inclusivity, and effectiveness. Critically, AI tool integration must proceed as a systematic and transparent process ensuring personal data protection, human

rights, and AI ethics. (see [OECD Report “Governing with Artificial Intelligence”](#), September 2025)

6. **Personal Data Protection and Information Security:** Personal data protection and information security must be institutionalized at both technical and content levels. Each platform must maintain a published, clear, and comprehensible Privacy Policy explicitly defining the scope of data processing, legal bases, and user rights. Processing of users' personal data must adhere to principles of proportionality and legality.
 7. **User Experience Assessment:** [Armenia's Digitalization Strategy](#) for 2021-2025 mandates regular monitoring of digital service delivery platform usability levels and implementation of measures for their enhancement, including continuous surveillance and targeted improvement initiatives. To ensure this, it is necessary to introduce a unified model and tools for assessing official digital service delivery platforms (Measuring Performance). Establishing regular assessment of official digital platforms as standard practice will create opportunities for comprehensive reform of these resources. It will also provide foundation for developing a unified development strategy for official platforms and creating innovative tools, making official information management and digital service delivery more efficient and beneficial for both citizens and government. The state must ensure continuous assessment and improvement of mechanisms for public digital services, engaging independent professional organizations and civil society.
 8. **Publication of Statistical and Analytical Data:** Publication of statistical and analytical data must become unified practice. Platforms must provide open, machine-readable statistical data for reuse that presents a complete and comparable picture. Such data must be useful and suitable for reuse. They must also demonstrate user satisfaction results from utilizing digital services.
 9. **Public Awareness:** Finally, even the best platform is meaningless if people remain unaware of its existence or cannot utilize it. In this regard, it is critically important to ensure regular awareness campaigns regarding platform existence, utility, usage mechanisms and their benefits providing people with accessible and complete information. Civil society's potential must be harnessed for this purpose.
-

MAIN RECOMMENDATIONS

Key Recommendations

The assessment reveals that Armenia's public digital service platforms require a **systemic approach** to ensure high-quality service delivery. The following overarching recommendations address identified gaps across all platforms.

Unified Standards Compliance

Digital service platforms must be comprehensively improved to ensure strict compliance with Armenian Digital Service Design Standards, Digitalization Principles, and Digital Architecture Principles eliminating fragmentation.

Inclusive Accessibility

Ensure WCAG 2.1 accessibility across all platforms. Accessibility tools must be visible, active, and functional on all pages: accounting for diverse user needs including visual and functional impairments.

Data Protection

Personal data protection must be strengthened at both technical and content levels. Each platform needs a published, clear Privacy Policy defining data processing scope, legal bases, and user rights.

AI-Powered Feedback

Implement AI solutions for rapid, substantive feedback. Integration must be systematic and transparent, ensuring personal data protection, human rights, and AI ethics. This creates new quality in state-citizen interaction.

Transparency

Improve transparency by clearly presenting creation and management legal bases, responsible state bodies and officials, and their contact information. Publish user satisfaction results and comprehensive statistical data.

User Experience Evaluation

Apply a unified performance measurement model and tools for regular assessment of official digital platforms. Continuous evaluation creates opportunities for comprehensive reforms and unified development strategy.



Awareness Campaigns

Even the best platform is meaningless if people don't know about it or can't use it. Conduct regular awareness campaigns about platform existence, utility, and usage mechanisms providing accessible, complete information.

Building Trust Through Digital Excellence

The assessment reveals that while Armenia has made **significant progress in digital governance**, systemic improvements are essential.

By implementing these recommendations, government digital platforms can become **truly citizen-centric, accessible, and transparent** strengthening the bond between state and citizen in the digital age.

108

Digital Platforms
Cataloged

45

Assessment
Criteria

3

Platforms
Evaluated

Freedom of Information Center | Yerevan 2026

"Digital Democracy in Action" Program

Supported by GIZ Armenia as part of the "Digital Democracy for All" initiative.

Annex 1: The Criteria of the E-Participation Platforms Assessment

The 45 criteria for evaluating online service delivery platforms (hereinafter referred to as “platforms”) are based both on requirements established by national legislation and on those shaped by international best practices. They are also grounded in the [digitalization principles](#) jointly developed by the Ministry of High-Tech Industry of the Republic of Armenia and the Armenian Information Systems Agency, the [Principles of Digital Architecture](#), the Armenian [Digital Services Design Standard](#) and the [Web Content Accessibility Guidelines](#) (WCAG 2.1).

1. Accessibility and Usability

This group of criteria helps determine how easy it is for a citizen to utilize the service provided by the platform.

- 1.1. The platform's name is simple, clear and directly relates to the content of the service provided.
- 1.2. Access to the platform is straightforward, without excessive preliminary authentication.
- 1.3. The registration and authentication process required to use the platform's services is fast, simple and requires minimal steps with the input of a minimal volume of data. In the case of the e-draft.am and e-request.am platforms, the platform can be used without mandatory registration and authentication.
- 1.4. On the platform's first page, in a prominent location, there is a concise guide regarding the digital services provided by the platform, their full description and understandable instructions for their use.
- 1.5. The platform has a Frequently Asked Questions (FAQ) section or another relevant section where regularly (five or more times) asked questions and their answers are published. The section is updated regularly.
- 1.6. All fields in the online forms/templates available on the platform have visible and understandable labels.
- 1.7. Forms, applications and request forms published on the platform are composed in a simple, understandable and accessible manner, and the purpose of each is clearly stated.
- 1.8. Special computer tools are not required to use the platform: programs requiring high computer specifications, special fonts, etc.
- 1.9. Computer skills are not required to use the platform; basic computer literacy is sufficient.
- 1.10. The platform is accessible for people with disabilities. Information is published in a way that considers the special needs of potential information recipients as much as possible (the site is adapted for users with low vision, includes contrast modes, photos and graphs are adapted for screen readers used by the blind, subtitles are provided on videos for users with hearing difficulties, etc.)².

² Order No. 10-N of the Minister of High-Tech Industry of the Republic of Armenia on approving the general requirements, standards, norms and rules ensuring the accessibility of information and communication, including web content, that promote the social inclusion of persons with disabilities.

- 1.11. Data published on the platform meets open data criteria: they are machine-readable, free, accessible, and suitable for free use and reuse.
- 1.12. Accessible Language:
 - 1.12.1. Published information (written texts, audio and video recordings, particularly descriptive and accompanying texts, news, and announcements) is in accessible language: literary, as free as possible from professional terminology. If it is necessary to use foreign words or terms in Armenian texts, they are accompanied by a comparable explanation in Armenian.
 - 1.12.2. Limited use of complex professional language and terminology (with the presence of accompanying descriptive explanations), and strict limitation of foreign words and acronyms (an Armenian equivalent or explanation is also provided).
 - 1.12.3. Digital services and accompanying information are available in Armenian, English, and Russian.
- 1.13. The platform has a technical support section for using it.
- 1.14. The platform is accessible and usable by everyone, not only by Armenian-speaking users or citizens of the Republic of Armenia.
- 1.15. The platform has a version for mobile phones, where the site's content is accessible in an identical manner by at least 90%.
- 1.16. Presence of an [Accessibility Statement for the platform](#).
- 1.17. Platform's compliance with the WCAG 2.1 AA level of the [Web Content Accessibility Guidelines](#), with an audit available.

2. Functionality and Service Quality

This group of criteria helps determine whether the platform solves a citizen's problem or merely provides information.

2.1. Degree of Service Digitization

- Level 1: Only information availability (list of documents).
- Level 2: Downloadable forms.
- Level 3: Online application submission.
- Level 4: Full digital service delivery (application, payment, receipt, tracking) without a visit to a state body.

2.2. Ability to track the application process and obtain complete information.

3. Technical Reliability and Speed

This group of criteria helps determine the reliability and speed of the platform's operation.

- 3.1. The platform operates seamlessly at all hours of the day.
- 3.2. The platform's loading speed and the speed of individual pages are a maximum of 2 seconds³.
- 3.3. Functionality across different browsers (Chrome, Safari).

³ The maximum acceptable loading time for an official website according to international standards is considered to be 2 seconds. If a website loads longer, a significant portion of users may leave it, which worsens the user experience (UX) and can negatively impact the website's effectiveness.

4. Security and Personal Data Protection

This group of criteria helps assess the security level of using the platform.

- 4.1. Presence of HTTPS security⁴.
- 4.2. Compliance with the "Law on Personal Data Protection".
- 4.3. Presence and clear presentation of a Privacy Policy.

5. Feedback and Support

This group of criteria helps assess the extent to which citizen feedback and support during the platform usage process are ensured.

- 5.1. The platform contains various tools to support the user: Hotline, online chat (e.g., Chatbot), email.
- 5.2. The platform provides the ability to report technical problems encountered while using it, or to submit complaints or suggestions.
- 5.3. The platform provides an opportunity to evaluate the user experience (e.g., "How would you rate the service?" and the ability to evaluate according to Service Quality Assessment [indicators](#)).
- 5.4. Presence of a Feedback/Contact Us section.

6. Transparency

This group of criteria helps assess the level of transparency ensured by the platform.

- 6.1. The names, contacts, feedback channels of the state body managing the platform, as well as the name, surname, phone number, and email address of the responsible official, are published on the platform's first page, in a prominent location.
- 6.2. Presence of normative legal acts related to the platform's operation (laws, decisions, orders, directives).
- 6.3. User satisfaction results regarding platform usage are published on the platform.
- 6.4. Availability of statistical data, including accessibility of statistical data for different years.

7. Navigation and Technical Standards (Platform's compliance with unified development approaches according to the Armenian Digital Service Design Standard (ADSD) ["Henaket" Design System and Templates, Principles of Armenian Digital Architecture](#)).

This group of criteria helps assess the platform's technical capabilities and parameters.

- 7.1. The platform has a user-friendly and simple interface; the colors are harmonious.
- 7.2. The font is uniform across all sections of the platform and the font size is legible.

⁴ HTTPS operates using SSL (Secure Sockets Layer) or TLS (Transport Layer Security) technology. When a website uses HTTPS, user data is transmitted in an encrypted manner. The green lock symbol in the browser's address bar indicates that the site is secure and possesses an SSL certificate. This is important because it ensures data protection by preventing data leakage through encryption. It also fosters user trust, as secure websites instill confidence in users. Furthermore, search engines like Google give preference to HTTPS-enabled sites in search results, and such websites are generally less vulnerable to cyber-attacks, enhancing overall cybersecurity.

- 7.3. The platform has a short, easy to remember address.
 - 7.4. Permanent accessibility to website sections leads to important, guiding sections.
 - 7.5. Accessibility of main services from the platform's homepage.
 - 7.6. Clear text to present the platform's content in accessible language. Application of the "**one idea per paragraph**" principle.
 - 7.7. Color contrast between text and background is used to facilitate easy reading.
 - 7.8. Availability of the option to change the text size⁵.
 - 7.9. Ability to copy, print, and download data and materials published on the platform is ensured.
 - 7.10. The platform has a search system that allows searching by complete words, phrases, sentences, and also by incomplete words. The site's search system works in a way that makes it easily accessible in search engines (Google, Yandex, etc.).
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⁵ It should be possible to enlarge the text up to 200% using the browser's zoom button, without assistive technologies, while ensuring beforehand that the website's functionality is not impaired.



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