

DIGITAL GOVERNMENT AND E-ADMINISTRATION: LEGAL FRAMEWORKS IN UZBEKISTAN, THE UNITED STATES, AND THE EUROPEAN UNION

Navruzbek Tilaboev

Tashkent State University of Law

AI and Law

nova.tilaboyev@gmail.com

Abstract: *Digital government has moved from a policy aspiration to a legal imperative in most modern states. This article compares the legal frameworks governing e-administration in Uzbekistan, the United States, and the European Union — three systems that have approached the challenge of digitizing public administration from very different starting points and through very different institutional mechanisms. The United States relies on a layered federal framework built on the Administrative Procedure Act and sector-specific statutes. The European Union has pursued harmonization through the Single Digital Gateway Regulation and the European Declaration on Digital Rights. Uzbekistan, operating under the Digital Uzbekistan 2030 strategy and a rapidly expanding series of presidential decrees, has moved with notable speed from near-total reliance on paper-based administration toward an increasingly integrated digital government system. The comparison reveals genuine Uzbek achievements alongside persistent gaps in legal accountability, data protection, and judicial oversight of digital administrative action. Practical implications for legal reform are identified.*

Keywords: *digital government; e-administration; administrative law; Uzbekistan; USA; European Union; e-government; public services; Digital Uzbekistan 2030*

I. Introduction

When the Digital Government Portal of the Republic of Uzbekistan launched on January 1, 2024, it was the latest milestone in a transformation that would have seemed implausible just a decade earlier. A country where citizens once spent hours in queues for the most basic administrative procedures was delivering more than 675 public services electronically, processing over 16 million service requests in the first half of 2025 alone. [3] These are real numbers, and they represent real change in the daily experience of government for ordinary Uzbek citizens and businesses.

But digitizing the delivery of administrative services and building a legally coherent framework for e-administration are different things, and it is the second challenge that this article addresses. The legal dimensions of digital government — who is accountable when an automated decision errs, how data generated by government platforms is protected, what procedural rights citizens retain when their interaction with the state occurs through an algorithm rather than a human official — are questions that every modernizing government

eventually has to answer. Some have answered them well. Others have answered them inadequately. Most are still working on it.

This article examines how Uzbekistan, the United States, and the European Union have built — or are building — the legal architecture that supports digital public administration. The comparison is not offered to suggest that Uzbekistan should simply adopt American or European models wholesale. The institutional contexts are too different for that to be sensible. But comparative analysis illuminates where Uzbekistan's current framework has genuine strengths, where important legal work remains, and what lessons from more mature systems can be adapted rather than transplanted.

II. The United States: Layered Federal Framework

American administrative law predates the digital era by several decades, which is both its strength and its problem. The Administrative Procedure Act of 1946 established the foundational procedural framework for federal agency action — notice-and-comment rulemaking, procedural requirements for formal adjudication, and crucially, the right of judicial review of agency decisions. [1] These foundations remain in place today, and they apply to digital administrative action as much as to traditional paper-based processes.

The challenge is that the APA was written for a world of paper files and human decision-makers, and its application to algorithmic agency action is contested and evolving. When a federal agency uses an automated system to make or influence an administrative decision — approving a benefit claim, assessing a regulatory penalty, allocating a contract — the procedural safeguards the APA provides do not map neatly onto the new environment. Courts have struggled with questions about the transparency of algorithmic decision-making, the adequacy of notice when a denial letter references a model the citizen cannot examine, and the meaning of "arbitrary and capricious" review in the context of decisions whose reasoning is encoded in statistical weights rather than articulated in prose. [7]

The United States government has responded with a patchwork of legislation and executive action. The E-Government Act of 2002 required agencies to make services available online and established the first framework for government-wide digital service delivery. The 21st Century Integrated Digital Experience Act of 2018 required federal websites to be accessible, mobile-friendly, and modern. Executive Order 14058 on Transforming Federal Customer Experience, issued in 2021, directed agencies to reduce administrative burden and improve the experience of digital government interactions. [7] The Government Accountability Office has consistently documented gaps between legislative intent and agency implementation, noting in a 2023 report that while most agencies have improved digital service delivery, accountability mechanisms for digital administrative failures remain underdeveloped. [7]

The OECD has noted that the United States' approach, while producing significant digital infrastructure, has been characterized by fragmentation and inconsistency across agencies. [8] There is no single digital gateway, no unified legal framework for electronic administrative acts, and no comprehensive federal data rights statute. The result is a system

that works well in some agencies and poorly in others, with citizens experiencing very different levels of digital service quality depending on which federal agency they are dealing with.

III. The European Union: Harmonization and Rights-Based Approach

The European Union has taken a markedly different approach — characteristically for the EU, it has pursued harmonization across member states through a combination of regulations, directives, and declarations that establish common standards and rights while leaving implementation largely to national governments.

The Single Digital Gateway Regulation, adopted in 2018 and progressively implemented through 2023, is the most concrete expression of the EU's digital government agenda. [5] It requires member states to make key administrative procedures available online and accessible through a single EU-wide portal, covering everything from business registration to recognition of professional qualifications. The Regulation creates a legal right for citizens and businesses to complete these procedures electronically across borders — a meaningful step toward genuine administrative integration in a union of 27 member states with different languages, legal systems, and administrative traditions.

The European Declaration on Digital Rights and Principles for the Digital Decade, adopted in 2022, goes further in establishing the normative framework within which digital government must operate. [4] It asserts that people should be able to access public services digitally and that digital public services must be inclusive, trustworthy, and human-centered. It commits the EU and member states to ensuring that people are not subject solely to automated decision-making in interactions with public authorities — a requirement with direct administrative law implications for how algorithmic tools can be used in government.

The EU's approach has real advantages. Rights are clearly stated, legal accountability for digital administrative action is embedded in the framework from the outset, and the General Data Protection Regulation provides a comprehensive data rights framework that applies to government data processing as it does to private sector processing. The limitation is implementation: directive-based harmonization leaves member states considerable discretion, and the gap between the legal framework and the reality of digital service delivery varies significantly across the EU. [8]

IV. Uzbekistan: Ambition, Achievement, and Legal Gaps

A. The Policy Architecture

Uzbekistan's digital government transformation has been driven primarily through presidential decrees rather than comprehensive legislation — a characteristic feature of Uzbekistan's reform approach that reflects both the speed at which the government wants to move and the institutional limitations of legislative process in a presidential system.

The foundational document is Presidential Decree No. UP-6079 of October 5, 2020, which approved the Digital Uzbekistan 2030 strategy. [10] The strategy set targets for electronic service delivery, digital infrastructure, and e-government maturity indices, framing digital transformation as a national priority comparable in importance to the economic and educational reform agendas. Subsequent presidential resolutions elaborated

on specific programs: the Digital Government and Digital Region programs for 2023-2024 outlined 300 priority projects, including 112 for digitizing public administration, 51 for digitizing the real economy, and 137 for regional digital transformation. Presidential Resolution No. PP-308 of September 14, 2023 established additional measures to improve Uzbekistan's ranking in the United Nations E-Government Survey. [11][2]

The results have been measurable. Uzbekistan rose from 69th to 63rd place in the United Nations E-Government Survey between 2022 and 2024, with an E-Government Development Index score of 0.7999 that surpassed the target set for 2025. [13] In the World Bank's GovTech Maturity Index of 2022, Uzbekistan advanced 37 positions to rank 43rd out of 198 countries, entering Group A with the highest GovTech maturity indicators. [14] By October 2024, more than 60 percent of public services were being delivered through the My.gov.uz portal, with 675 services available on the platform. The Digital Government Portal launched in January 2024 integrates more than 200 government information systems, and the shift to electronic document circulation has reportedly saved citizens and businesses an estimated 1.64 million euros annually. [6]

B. The Legal Gaps

The achievements are genuine. The legal framework supporting them is less complete than the service delivery numbers suggest, and this is where the comparison with the United States and EU is most instructive.

First, accountability for digital administrative action remains underdeveloped. Uzbekistan has a Code of Administrative Responsibility that governs administrative offenses, but it was not designed with digital government in mind and does not address the specific accountability questions that arise when administrative decisions are made or supported by automated systems. [12] When a citizen's application is rejected by an algorithmic system, the procedural pathway for challenge — who was responsible for the decision, what reasoning is disclosable, what remedies are available — is not clearly specified in the current framework. The OECD Digital Government Review of Uzbekistan, published in 2023, identified the development of clear accountability mechanisms for digital administrative action as one of the priority areas for legal reform. [9]

Second, data protection law has not kept pace with digital government expansion. Uzbekistan has a Law on Personal Data (ZRU-547, 2019) that establishes basic data protection requirements, but it is significantly less comprehensive than the EU's General Data Protection Regulation in terms of individual rights, oversight mechanisms, and enforcement. [9] As government platforms collect increasing volumes of citizen data, the adequacy of existing legal protections becomes a more pressing question.

Third, judicial oversight of digital administrative action is limited in practice. Uzbekistan's rule of law index scores — ranking 83rd globally in the World Justice Project's 2024 index, with particularly low scores on constraints on government powers (0.38) and open government (0.37) [9] — reflect a broader pattern in which executive action is inadequately checked by independent judicial review. Digital administrative decisions are

not insulated from this structural issue; if anything, their technical complexity makes meaningful judicial scrutiny harder rather than easier.

V. Comparative Analysis and Reform Implications

The three systems examined here represent distinct models of digital government legal architecture. The United States offers a rights-protective but fragmented framework, grounded in the APA's guarantee of procedural fairness and judicial review but struggling with the application of that guarantee to algorithmic administrative action. The EU offers the most rights-explicit framework, with clear legal commitments to human oversight of automated decisions and comprehensive data protection, but faces the persistent challenge of translating harmonized norms into consistent national implementation. Uzbekistan has the most dynamic recent trajectory, having built digital service delivery infrastructure at impressive speed, but has not yet developed the accountability and rights frameworks that would make that infrastructure legally sound by international standards.

The most important lesson from the American and European experience for Uzbekistan is that digital service delivery and legal accountability for digital administration need to develop together rather than sequentially. The common pattern in early digital government initiatives globally has been to prioritize service delivery — getting services online, reducing queues, improving convenience — while deferring the harder legal questions about accountability, data rights, and judicial oversight. That deferral becomes increasingly costly as digital government matures, because retrofitting accountability frameworks onto already-deployed systems is substantially harder than building them in from the outset. [8]

Specifically, Uzbekistan would benefit from three legal reforms. First, a statutory framework for electronic administrative acts — establishing their legal validity, the conditions under which automated administrative decisions are permissible, the procedural safeguards that apply, and the remedies available when digital administrative action is erroneous. Second, a strengthened data protection law with independent oversight and meaningful enforcement, aligned with international standards. Third, clearer provision for judicial review of digital administrative decisions, including provisions that require government systems to produce human-readable reasoning in support of algorithmically influenced decisions. [9][14]

VI. Conclusion

Uzbekistan's digital government transformation is a genuine success story in important respects, and the international recognition it has received — in UN e-government rankings, in World Bank assessments, in OECD reviews — is not undeserved. More than 16 million digital service interactions in the first half of 2025 represent real improvement in the daily experience of citizens and businesses. [6]

But digital transformation that outpaces legal accountability is not a complete transformation. The hardest part of building a digital government — establishing who is responsible when automated systems make errors, what rights citizens have in their digital interactions with the state, and how courts can meaningfully review digital administrative

action — is the part that Uzbekistan still has most left to do. The American and European experiences, imperfect as both are, offer instructive precedents. The opportunity to learn from those precedents, rather than repeating their mistakes, is one that Uzbekistan's reformers should not pass up.

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