

The Office of Management and Budget (OMB) is seeking comments on the draft Information Quality Guidelines that follow ([see Federal Register Notice](#)). These draft Information Quality Guidelines describe OMB's pre-dissemination information quality control and an administrative mechanism for requests for correction of information publicly disseminated by OMB. Please submit comments to Jefferson B. Hill of the Office of Information and Regulatory Affairs, OMB, by fax at (202 395-7245). Comments may be e-mailed to "informationquality@omb.eop.gov."

SUBJECT: Draft Office of Management and Budget Information Quality Guidelines

PURPOSE: The "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" require federal agencies to make available on their websites, no later than October 1, 2002, guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies, including administrative mechanisms allowing affected persons to seek and obtain correction of information maintained and disseminated by the agency that does not comply with the guidelines.

The Office of Management and Budget now seeks public comments on the following draft guidelines covering pre-dissemination information quality control and an administrative mechanism for requests for correction of information publicly disseminated by OMB. Comments should be submitted by June 14, 2002.

Please submit comments to Jefferson B. Hill of the Office of Information and Regulatory Affairs, Office of Management and Budget by fax at (202) 395-7245. Comments can also be e-mailed to informationquality@omb.eop.gov.

The comments received by OMB will become a matter of public record. Revised OMB guidelines will be available on OMB's website. Notice of the availability of these guidelines will be published in the Federal Register on or before October 1, 2002. OMB's guidelines may be revised periodically to address the needs of OMB and concerns expressed by the public.

BACKGROUND: These guidelines are drafted in accordance with "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" (hereafter, Agency-wide Guidelines) published by OMB in the Federal Register in Volume 66, No. 189 at 49718 on Friday, September 28, 2001, updated in Volume 2, No. 67 at 369 on Thursday, January 3, 2002 (67 F.R. 369) and corrected in Volume 2, No. 67 at 8452 on February 22, 2002. These published guidelines were issued pursuant to Section 515 of the Treasury and General Government Appropriations Act for FY2001 (Public Law 106-554), which directed OMB to issue government-wide guidelines providing guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by Federal agencies. In accordance with these provisions, each Federal agency is obligated to:

1. Issue their own information quality guidelines ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by the agency no later than October 1, 2002;
2. Establish administrative mechanisms allowing affected persons to seek and obtain correction of information maintained and disseminated by the agency that does not comply with these OMB guidelines; and
3. Report annually to the Director of OMB, beginning January 1, 2004, the number and nature of complaints received by the agency regarding agency compliance with these OMB guidelines concerning the quality, objectivity, utility, and integrity of information and how such complaints were resolved.

Consistent with the Agency-wide Guidelines, OMB's draft guidelines rely on its existing practices, to the extent they are consistent with the recently published guidelines, while adopting a new administrative mechanism to satisfy the new procedural requirements. OMB's guidelines reflect its internal procedures for reviewing and substantiating information to maximize quality, including the objectivity, utility, and integrity of information, before it is disseminated. The administrative mechanism allows affected persons to seek and obtain, where appropriate, correction of information disseminated by OMB that does not comply with these guidelines or with the Agency-wide Guidelines. OMB's draft guidelines follow:

DRAFT OFFICE OF MANAGEMENT AND BUDGET INFORMATION QUALITY GUIDELINES

The Office of Management and Budget publishes these guidelines in accordance with the Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies (Agency-wide guidelines) published by OMB in the Federal Register in Volume 66, No. 189 at 49718 on Friday, September 28, 2001, updated in Volume 2, No. 67 at 369 on Thursday, January 3, 2002 (67 F.R. 369) and corrected in Volume 2, No. 67 at 8452 on February 22, 2002. These published guidelines were issued pursuant to Section 515 of the Paperwork Reduction Act (44 U.S.C. 3502(1) *et seq.*). In response to the legislation and the published guidelines, OMB identifies the following policies and procedures for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by OMB; and it hereby establishes additional procedures for affected persons to seek and obtain correction of information maintained and disseminated by OMB that does not comply with standards set out in the Agency-wide Guidelines.

I. Procedures for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Prior to Dissemination

In Agency-wide Guidelines, “quality” is defined as an encompassing term comprising utility, objectivity, and integrity.

A. Objectivity and Utility of Information

1. As defined in Section IV, below, “objectivity” is a measure of whether disseminated information is “accurate, clear, complete, and unbiased;” “utility” refers to the usefulness of the information to its intended audience. OMB is committed to disseminating reliable and useful information. Before disseminating information, OMB staff and officials should subject such draft information to an extensive review process. It is the primary responsibility of the OMB Division or Office (hereafter collectively referred to as “Division”) drafting information intended for dissemination to pursue the most knowledgeable and reliable sources reasonably available to confirm the objectivity and utility such information.
2. Much of the information OMB disseminates consists of or is based on information submitted to OMB by other Federal Government Agencies. OMB expects that agencies will subject information submitted to OMB to adequate quality control measures. In drafting the material to be disseminated, the Lead Division should review and verify the data submitted by the agencies, as necessary and appropriate.
3. In seeking to assure the “objectivity” and “utility” of the information it disseminates, OMB should generally follow a basic clearance process coordinated by the Lead Division drafting information intended for dissemination. The quality control process places responsibility for action upon the Lead Division. The Lead Division is encouraged to consult with all Divisions throughout OMB having substantial interest or expertise in the material proposed to be disseminated. Where appropriate, substantive input also should be sought from other offices within the Executive Office of the President (EOP), other government agencies, non-government organizations, and the public.
4. The Lead Division should consider the uses of the information from both the perspective of OMB and the public. When it is determined that the transparency of information is relevant for assessing the information’s usefulness from the public’s perspective, the Lead Division should ensure that transparency is appropriately addressed.
5. When the Lead Division determines that the information it will disseminate is influential scientific, financial, or statistical information, extra care should be taken to include a high degree of transparency about data and methods to meet the Agency-wide Guidelines’ requirement for the reproducibility of such information. In determining the appropriate level of transparency, the Lead Division should consider the types of data that can practicably be subjected to a reproducibility requirement given ethical, feasibility, and confidentiality constraints. In making

this determination, the Lead Division should hold analytical results to an even higher standard than original data.

6. The Division responsible for the dissemination of information should consider steps such as the following to assure the “objectivity” and “utility” of the information to be disseminated:
 - a. Preparing a draft of the document after consulting the necessary parties, including government and non-government sources, as appropriate;
 - b. Determining necessary clearance points;
 - c. Determining where the final decision shall be made;
 - d. Determining whether peer review would be appropriate and, if necessary, coordinating such review;
 - e. Obtaining clearances; and
 - f. Overcoming delays and, if necessary, presenting the matter to higher authority.
7. Hard-copy public dissemination of information and all information published on OMB’s website shall occur only after clearances are obtained from all appropriate Divisions and, as appropriate, the Office of the Director.
8. The quality control procedures followed by OMB should vary with the nature of the information and the manner of its distribution.
9. These guidelines focus on procedures for the “dissemination” of “information,” as those terms are defined herein. Accordingly, procedures specifically applicable to forms of communication outside the scope of these guidelines, such as those for correspondence or press releases, among others, are not included.

Conclusion: OMB will maximize the quality of the information it disseminates, in terms of objectivity and utility, first by looking for input from a range of sources and perspectives, to the extent practicable under the circumstances, and second by subjecting draft materials to a review process involving as many Divisions and offices as may be in a position to offer constructive input, as well as other offices within the Executive Office of the President and other government agencies.

B. Integrity of Information

1. “Integrity” refers to the security of information—protection of the information from unauthorized unanticipated, or unintentional modification -- to prevent information from being compromised through corruption or falsification.
2. Within the Executive Office of the President (EOP), the Office of Administration has substantial responsibility for ensuring the “integrity” of information as defined in these guidelines. OMB also has an Administration Office that coordinates and works with the EOP Office of Administration to ensure the integrity of information. These offices implement and

maintain new computer software and hardware systems and provide operational support for systems and system users.

3. Computer security is the responsibility of the EOP Office of Administration's Chief Information Officer, Information Assurance Directorate. This Office oversees all matters relating to information integrity, including the design and implementation of the security architecture for the EOP, periodic audits of security architecture components, and review and approval of changes to the technical baseline. Per law and OMB policy, EOP's IT security policy, procedures, and controls are risk-based, cost-effective, and incorporated into the lifecycle planning of every IT investment. Additionally, the Office: assesses risks to its systems and implements appropriate security controls; reviews annually the security of its systems; and develops plans to remediate all security weaknesses found in independent evaluations and other security audits and reviews.

4. As an agency under the EOP, OMB is an integral part of the overall EOP network, and is an active participant in all aspects of information integrity at EOP. OMB adheres to both law and OMB IT security policies, along with EOP security policies and operational processes for the protection of OMB's data and information. This includes ensuring that controls to protect the security of information (and the integrity of information) are risk-based, cost-effective, and incorporated into the life-cycle planning of every IT investment. OMB's systems are reviewed annually in accordance with existing law and policy and corrective action plans are developed to address all security weaknesses, such as integrity issues.

Section II. Requests for Correction of Information Publicly Disseminated by the Office of Management and Budget

OMB works continuously to be responsive to users of its information and to ensure quality. In furtherance of these objectives, when OMB receives any information from the public that raises questions about the quality of the information it has disseminated, OMB duly considers corrective action.

1. Persons seeking to correct information affecting them that was publicly disseminated by OMB may submit such requests to the Data Quality Coordinator, at [insert OMB address]. Persons should address requests to "Data Quality Coordinator" and clearly indicate that the communication is a "Request for Correction" under Section 515 of the Treasury and General Government Appropriation Act for Fiscal Year 2001. Persons should specify the information that is being contested, the aspect of the information that needs to be corrected, an explanation of how they are affected by the information, how the information identified does not comply with OMB guidelines, and what corrective action is sought. Persons should provide all supporting documentation necessary for OMB to resolve the complaint.

2. If the information disseminated by OMB and contested by an affected person was previously disseminated by another Federal agency in virtually identical form, then the complaint should be directed to the originating agency.

3. Requests will be received by the Data Quality Coordinator. Typically, requests raising substantive issues will be forwarded to the Division within OMB responsible for the subject area.

4. These guidelines apply only to requests submitted as outlined in Section II, number 1 above. These guidelines will not be applied to any other form of request and also may not be applied to a request submitted consistent with the procedures outlined above, if OMB determines:

- (a) it is not submitted by an *affected* person for the correction of publicly *disseminated information* of the Office of Management and Budget, as those terms are defined in these guidelines, or
- (b) the information identified in Section II, item 1 above has not been provided in full.

All requests submitted as outlined in Section II, number 1 above that are not excluded under the criteria identified in (a) or (b) of this section, will be considered “covered requests” and will be processed under these guidelines.

5. If OMB determines that a request is not covered by these guidelines, it will so advise the requester within 60 days, unless there is a reasoned basis for an extension. If a request is deemed frivolous, no response will be made.

6. For covered requests, the Division reviewing the request will give the request due consideration, including a review of the disseminated information at issue and other materials, as appropriate. Where the reviewing Division or office determines that the information publicly disseminated by OMB warrants correction, it should consider appropriate corrective measures recognizing the potential implications for OMB and the United States.

7. When considering covered requests to determine whether a corrective action is appropriate, the reviewing Division may consider the factors in Section 2, number 4 in addition to the following factors:

- (a) The significance of the information involved and
- (b) The nature and extent of the request and the public benefit of making the requested correction.

8. If OMB determines that a request is covered by these guidelines, but that corrective action is unnecessary or is otherwise inappropriate, OMB will notify the requestor of its determination within 60 days, unless there is a reasoned basis for an extension.

9. If OMB determines that a request is covered by these guidelines and that corrective action is appropriate, it will notify within 60 days the requestor of its determination and what action has been or will be taken, unless there is a reasoned basis for an extension. Subject to applicable law, rules and regulations, corrective measures may be taken through a number of forms, including (but not limited to): personal contacts via letter or telephone, form letters, press releases or postings on the OMB website to correct a widely disseminated error or address a frequently raised request. Corrective measures, where appropriate, should be designed to provide reasonable notice to affected persons of such correction.

Section III. Procedures for Requesting Reconsideration

1. The following procedures are available to an affected person who has filed a covered request for correction of public information in accordance with Section II, above; who received notice from the Data Quality Coordinator of OMB's determination; and who believes that the Office of Management and Budget did not take appropriate corrective action. Requests determined by OMB to be not covered by the guidelines and requests determined to be frivolous will not be reconsidered under these provisions. These procedures apply to information disseminated by OMB on or after October 1, 2002.

2. To request reconsideration, persons should clearly indicate that the communication is a "Request for Reconsideration;" should reference Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001; and should include a copy of the request for correction previously submitted to OMB and OMB's response. Resubmission should be made to the Data Quality Coordinator by e-mail, fax or mail using the contact information in Section II, paragraph 1, above. Requests for Reconsideration must be submitted within thirty (30) days of the date of OMB's notification to the requester of the disposition of the underlying request for correction.

3. OMB's Executive Associate Director will consider the request for reconsideration, applying the standards and procedures set out in Section II, above and will make a determination regarding the request. In most cases, the requestor will be notified of the determination and, if appropriate, the corrective action to be taken, within 60 days. OMB will give reasonable notice to affected persons of any corrections made.

IV. Definitions

1. "Affected" persons are those who may benefit or be harmed by the disseminated information. This includes both: (a) persons seeking to address information about themselves or about other persons to which they are related or associated; and (b) persons who use the information.

2. “Dissemination” means agency initiated or sponsored distribution of information to the public (see 5 CFR 1320.3(d) “Conduct or Sponsor”). Dissemination does not include distributions of information or other materials that are:

- (a) intended for government employees or agency contractors or grantees;
- (b) intended for U.S. Government agencies;
- (c) produced in responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or similar law;
- (d) correspondence or other communication limited to individuals or to other persons, within the meaning of paragraph 7, below; or
- (e) communications such as press releases, interviews, speeches, and similar statements.

Also excluded from the definition are archival records; public filings; responses to subpoenas or compulsory document productions; or documents prepared and released in the context of adjudicative processes. These guidelines do not impose any additional requirements on agencies during adjudicative proceedings and do not provide parties to such adjudicative proceedings any additional rights of challenge or appeal.

3. “Influential,” when used in the phrase “influential scientific, financial, or statistical information,” refers to disseminated information that OMB determines will have a clear and substantial impact on important public policies or important private sector decisions.

4. “Information,” for purposes of these guidelines, including the administrative mechanism described in Sections II and III, above, means any communication or representation of facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition does not include:

- (a) opinions, where the presentation makes clear that the statements are subjective opinions, rather than facts. Underlying information upon which the opinion is based may be subject to these guidelines only if that information is published by OMB;
- (b) information originated by, and attributed to, non-OMB sources, provided OMB does not expressly rely upon it. Examples include: non-U.S. Government information reported and duly attributed in materials prepared and disseminated by OMB; hyperlinks on OMB’s website to information that others disseminate; and reports of advisory committees published on OMB’s website;
- (c) statements related solely to the internal personnel rules and practices of OMB and other materials produced for OMB employees, contractors, agents or alumni;
- (d) descriptions of the agency, its responsibilities and its organizational components;
- (e) statements, the modification of which might cause harm to the national security, including harm to the national defense or foreign relations of the United States;

(f) statements of Administration policy; however, any underlying information published by OMB upon which a statement is based may be subject to these guidelines;

(g) testimony or comments of OMB officials before courts, administrative bodies, Congress, or the media;

(h) investigatory material compiled pursuant to U.S. law or for law enforcement purposes in the United States; or

(i) statements which are, or which reasonably may be expected to become, the subject of litigation, whether before a U.S. or foreign court or in an international arbitral or other dispute resolution proceeding.

5. “Integrity” refers to the security of information -- protection of the information from unauthorized access or revision, to prevent the information from being compromised through corruption or falsification.

6. “Objectivity” addresses whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner, including background information where warranted by the circumstances..

7. “Person” means an individual, partnership, association, corporation, business trust, or legal representative, an organized group of individuals, a regional, national, State, territorial, tribal, or local government or branch thereof, or a political subdivision of a State, territory, tribal, or local government or a branch of a political subdivision, or an international organization;

8. “Quality” is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer these four statutory terms, collectively, as “quality”.

9. “Utility” refers to the usefulness of the information to its intended users, including the public.