

Bureau of Economic Analysis

Information Quality Guidelines

This document is also available in <u>PDF</u>. October 1, 2002

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Background

Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554), hereinafter "Section 515," directs the Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies." OMB complied by issuing guidelines which direct each Federal agency to (A) issue its own guidelines ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by the agency; (B) establish administrative mechanisms allowing affected persons to seek and obtain correction of information that does not comply with the OMB 515 Guidelines (Federal Register: February 22, 2002, Volume 67, Number 36, pp. 8452-8460, hereinafter "OMB Guidelines") and the agency guidelines; and (C) report periodically to the Director of OMB on the number and nature of complaints received by the agency regarding the accuracy of information disseminated by the agency and how such complaints were handled by the agency.

As described on page 8459 of the OMB Guidelines, OMB states that "It is not always clear how each substantive term" [quality, utility, objectivity, and integrity] "relates-or how the four terms in aggregate relate-to the widely divergent types of information that agencies disseminate." Furthermore OMB states that "...while agencies' implementation of the guidelines may differ, the essence of the guidelines will apply. ...That is, agencies must make their methods transparent by providing documentation, ensure quality by reviewing the underlying methods used in developing the data and consulting (as appropriate) with experts and users, and keep users informed about correction and revisions."

This document fulfills the OMB and Department of Commerce (DOC) information quality guidelines. In addition BEA is a signatory

to the joint statistical agency Federal Register notice on information quality guidelines. These guidelines may be revised periodically, based on experience, evolving requirements in the Bureau of Economic Analysis (BEA), and concerns expressed by the public. Covered information disseminated by BEA will comply with all applicable OMB, DOC, and (these) BEA Information Quality Guidelines.

These guidelines take effect October 1, 2002 and apply to information disseminated on or after October 1, 2002, but still in use.

Because most of the guidelines presented in this document reflect existing practice in BEA, the present tense has been used when describing them; but regardless of tense used, a performance standard is intended.

In implementing these guidelines, BEA acknowledges that ensuring the quality of information is an important management objective that takes its place alongside other BEA objectives, such as ensuring the success of BEA missions, observing budget and resource priorities and restraints, and providing useful information to the public. BEA intends to implement these guidelines in a way that will achieve all these objectives in a harmonious way.

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Mission

The Bureau of Economic Analysis (BEA) seeks to enhance the understanding of the U.S. economy by providing the most relevant and accurate economic accounts data in a timely and cost-effective manner and by making its data widely accessible. BEA produces some of the most closely watched economic statistics that influence the decisions made by government officials, business people, households, and individuals. BEA's economic statistics, which provide a comprehensive, up-to-date picture of the US economy, are key ingredients in critical decisions affecting monetary policy, tax and budget projections, and business investment plans.

The cornerstone of BEA's statistics is the national income and product accounts (NIPA's), which feature the estimates of gross domestic product (GDP). Since these accounts were first developed in the 1930's, BEA has extended its estimates to cover a wide range of economic activities. Today, BEA prepares national, regional, industry, and international accounts, presenting vital information on such key issues as economic growth, regional economic development, interindustry relationships, and the Nation's position in the world economy. BEA data play a crucial role in decisions affecting fiscal and monetary policy, Federal budget projections, business investment plans, the allocation of Federal funds to the States, and international financial transactions of all kinds. BEA's principal programs and activities are described below.

National Economic Accounts - BEA's national economic program provides a quantitative view of US domestic production, consumption, and investment, of exports and imports, and of national and domestic income and saving. It features the estimates of GDP, which is one of the most closely watched of all economic statistics. Each month, BEA releases updated estimates of GDP for the previous quarter and new estimates of personal income and outlays for the previous month. Estimates of the Nation's stock of fixed assets and consumer durable goods are prepared and published annually.

Regional Economic Accounts - This program produces detailed data on economic activity by region, State, metropolitan area, and county. Estimates of personal income by State are released each quarter. Estimates of personal income by county and metropolitan area are prepared annually. BEA also prepares annual estimates of gross State product by industry.

Industry Economic Accounts - BEA's Industry Economic Program produces the input-output tables, which show how industries interact to provide input to, and take output from, each other. Comprehensive, benchmark input-output tables are prepared every 5 years, and they are updated in less detail by annual input-output tables. The industry program also produces the annual gross product by industry data, which measure the contribution of each private industry and government to the GDP.

International Economic Accounts - This BEA program produces the quarterly balance of payments accounts and the monthly services estimates, which provide a detailed view of economic transactions between the United States and other countries. In addition, BEA produces the direct investment estimates, which are based on annual and quarterly BEA surveys of US direct investment abroad, foreign direct investment in the United States, income flows associated with those investments, and other economic activities of multinational enterprises. This program also produces the international investment position estimates.

To produce these various estimates, BEA collects data from other statistical agencies (mostly other Federal statistical agencies) as well as from firms. The types of data include value of shipments, employment and wages, price indexes, tax data, and administrative and regulatory data. In addition, BEA conducts research and analysis, develops and implements estimation methodologies and

disseminates statistics to the public. Because source data are received over time, BEA provides a series of estimates that are routinely revised to reflect more complete source data. For example, in regard to the estimates of GDP, there are three current quarterly estimates that are made for each quarter. These are labeled, in sequence, advance, preliminary, and final estimates. They are released near the end of each of the three months following the end of each quarter. In addition, three annual revision estimates are made for each quarter and are released in each of the next 3 years. Finally, there is a comprehensive revision that is made approximately every 5 years.

The Bureau of Economic Analysis has a long tradition of engaging in activities that ensure and maximize the quality of its disseminated data. It achieves that goal by setting high standards of performance in the following areas: Concepts, Methods, and Estimation Procedures; Source Data; Planned Revisions and Revision Studies; and Integrity. Each of these areas is discussed below and Web links are provided to papers/articles that expand on BEA's efforts in that area. Several papers contain material that pertain to more than one area and are accordingly cited multiple times.

Information disseminated by BEA is presented in a clear, complete, and unbiased manner, and in a context that enhances its usability to the intended audience. The sources of the disseminated information are identified to the extent possible and consistent with BEA's data security and release procedures, which includes a thorough review of the data before release, and the protection of the information from unauthorized access or revision. Information collected by BEA incorporates the clearance process required by the Paperwork Reduction Act.

BEA considers all its published statistical information to be "influential," in that it has a substantial impact on important public policies and private sector decisions.

BEA strives for the highest level of transparency about data and methods for all its estimates, within ethical, feasibility, cost, and confidentiality constraints. This supports the development of consistently high quality data and fosters better value to the public. It also facilitates the reproducibility of such data by qualified third parties.

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Concepts, Methods and Estimation Procedures

A continual challenge for BEA is to determine how best to measure the performance of the economy. To that end, BEA staff engages in research and consult with researchers in other government agencies, the Federal Reserve and academia. Additionally, BEA attends meetings of and makes presentations to several professional associations (for example, American Economic Association, National Association of Business Economists) and international agencies such as the Organization for Economic Cooperation and Development, and the International Monetary Fund. It has also established a BEA Advisory Committee to assist in these efforts.

Furthermore, BEA routinely consults with users to ensure that the concepts and methods used are useful. To enhance the understanding of users, BEA also strives to make its concepts and methods readily available. The consequent transparency facilitates not only an understanding of the concepts and methods but also forecasts of future estimates. For example, Federal Reserve economists as well as Wall Street analysts carefully scrutinize BEA's GDP estimates and routinely forecast GDP estimates. It is a testament to the transparency of the BEA's process that these forecasts are usually well within the average range of revision to the BEA estimate for the quarter. BEA estimation procedures are economically and statistically sound, designed by highly qualified economists, statisticians, and accountants. BEA's commitment to quality includes the use of modern statistical and economic theory in producing its estimates by improving the processes of compiling, editing, and analyzing the data. Each BEA program has the flexibility to choose the estimation program that best suits its needs. Accordingly there is no single description of BEA's estimation procedures.

The links to the articles/papers describing the various concepts and methods and the procedures used to prepare BEA's national, industry, regional, and international accounts used by BEA are provided below. Generally, these links will be to articles on annual and comprehensive revisions, describing any methodological changes in updating our annual accounts, major source data incorporated and any changes in presentation. In addition, there are also articles and publications that specifically describe our methodologies and estimation procedures for specific programs and/or components within a program. All methodology papers are also available on our Web site in our methodology section.

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Links to Relevant Articles and Papers

National

Corporate Profits: Profits Before Tax, Profits Tax Liability, and Dividends, September 2002

Updated Summary NIPA Methodologies, Survey of Current Business (SCB), October 2001

Fixed Assets and Consumer Durable Goods for 1925-2000, SCB, September 2001

Annual Revision of the National Income and Product Accounts: Annual Estimates, 1998-2000, and Quarterly Estimates, 1998:I-2001:I, SCB, August 2001

A Guide to the NIPA's (Methodology, National Income and Product Accounts, 1929-97), June 2001

Recognition of Business and Government Expenditures for Software as Investment: Methodology and Quantitative Impacts, 1959-98, May 2000

Fixed Assets and Consumer Durable Goods--Estimates for 1925-98 and New NIPA Table: Changes in Net Stock of Produced Assets, SCB, April 2000

Improved Estimates of the NIPA's for 1929-99: Results of the comprehensive revision, SCB, April 2000

<u>Improved Estimates of the National Income and Product Accounts for 1959-98: Results of the Comprehensive Revision, SCB, December 1999</u>

A Preview of the 1999 Comprehensive Revision of the National Income and Product Accounts: Statistical Changes, SCB, October 1999

A Preview of the 1999 Comprehensive Revision of the National Income and Product Accounts: New and Redesigned Tables, SCB, September 1999

A Preview of the 1999 Comprehensive Revision of the National Income and Product Accounts: Definitional and Classificational Changes, *SCB*, August 1999

Methodology, Fixed Reproducible Tangible Wealth in the United States, 1925 - 94, August 1999

Price Indexes for Selected Semiconductors, 1974-96, SCB, February 1998

The Measurement of Depreciation in the NIPA's, SCB, July 1997

Preview of the Comprehensive Revision of the National Income and Product Accounts: New and Redesigned Tables, SCB, October 1995

<u>Preview of the Comprehensive Revision of the National Income and Product Accounts: Recognition of Government Investment and Incorporation of a New Methodology for Calculating Depreciation, *SCB*, September 1995</u>

Gross Domestic Product as a Measure of US Production, SCB, August 1991

MP-6: Personal Consumption Expenditures, June 1990

MP-5: Government Transactions, November 1988

MP-1: Introduction to National Economic Accounting, March 1985

Regional

SPI, State Personal Income 1929-2000, November 2001 (CD-ROM only)

A <u>Windows help file</u> containing technical notes, contact information, frequently asked questions, and links to Gross State Product articles, November 2001

REIS, Regional Economic Information System, 1969-1999, May 2001 (CD-ROM only)

Comprehensive Revision of Local Area Personal Income: Revised Estimates for 1969–97 and New Estimates for 1998, SCB, July 2000

Comprehensive Revision of State Personal Income: Revised Estimates for 1969–98 and Preliminary Estimates for 1999, SCB, June 2000

State Personal Income, 1929–97, May 1999

Comprehensive Revision of Gross State Product by Industry, 1977–94, SCB, June 1997

Regional Multipliers: A User Handbook for the Regional Input-Output Modeling System (RIMS II), Third Edition, March 1997

Local Area Personal Income, 1969–92, September 1994

Industry

Improved Estimates of Gross Product by Industry for 1947-98, SCB, June 2000

Annual Input-Output Accounts of the US Economy, 1996, SCB, January 2000

Investment in New Structures and Equipment in 1992 by Using Industries, SCB, December 1998

Methodology and Appendixes, Benchmark Input-output Accounts of the United States, 1992, September 1998

US Travel and Tourism Satellite Accounts for 1992, SCB, July 1998

US Transportation Satellite Accounts for 1992, SCB, April 1998

Gross Product by Industry Price Measures 1977-96, SCB, March 1998

International

US International Transactions: Revised Estimates for 1989-2000, SCB, July 2001

Foreign Direct Investment in the United States: 1997 Benchmark Survey, Final Results, June 2001

US International Transactions, Revised Estimates for 1982-99, SCB, July 2000

US International Transactions, Revised Estimates for 1982-98, SCB, July 1999

US Direct Investment Abroad: 1994 Benchmark Survey, Final Results, May 1998

US International Transactions in Private Services: A Guide to the Surveys Conducted by BEA, March 1998

Foreign Direct Investment in the United States: Establishment Data for 1992, May 1997

A Guide to BEA Statistics on US Multinational Companies, SCB, March 1995

The Balance of Payments of the United States: Concepts, Data Sources, and Estimating Procedures, May 1990

A Guide to BEA Statistics on Foreign Direct Investment in the United States, February 1990

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Source Data

BEA receives data from a variety of reliable sources. Most of the data, however, come from over 400 surveys and other data collections sponsored by other Federal agencies, that is, from statistical agencies, aggregate tax data sources, administrative and regulatory sources, and private trade sources. For the Federal sources, BEA expects that they adhere to their information quality guidelines. For the private sources, every effort is undertaken to ensure that the data used in BEA's estimation procedures are of high quality. BEA validates the quality of these data through a variety of ways such as employing computer edit checks for gross errors, identifying and analyzing outliers, and examining period-to-period changes to ensure that these data are accurate, reliable, and relevant for the estimates being made.

Included in our estimates of international trade in services, BEA conducts its own ongoing surveys, which are based on well-maintained sampling frames. Data are collected according to documented procedures and in a manner that reflects standard practices accepted by the relevant economic/statistical communities. BEA conducts a thorough review of the survey input data using sound statistical techniques to ensure the data quality before the final estimates are released.

In the 1980's, BEA established the Source Data Improvement and Evaluation Program (SDIEP); its purpose continues to be

monitoring and tracking the needs of all BEA's programs for data provided by Federal agencies. As part of the SDIEP, BEA routinely reviews and comments on current and proposed surveys and other data collections with the intent of improving the quality and timeliness of the BEA estimates. Depending upon the BEA program, the data sources underlying BEA estimates are documented either in separate publications or in SCB articles. These articles are located at the BEA Web site by program area. Most of the same articles posted in the methods section present a source data section, which describes the sources and any changes in them that have caused revisions in the annual accounts. The links are provided below.

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Links to Relevant Articles and Papers

National

Updated Summary NIPA Methodologies, SCB, October 2001

Annual Revision of the National Income and Product Accounts: Annual Estimates, 1998-2000, and Quarterly Estimates, 1998:I-2001:I, SCB, August 2001

Improved Estimates of the NIPA's for 1929-99: Results of the comprehensive revision, SCB, April 2000

Improved Estimates of the National Income and Product Accounts for 1959-98: Results of the Comprehensive Revision, SCB, December 1999

Regional

SPI, State Personal Income 1929-2000, November 2001 (CD-ROM only)

A <u>Windows help file</u> containing technical notes, contact information, frequently asked questions, and links to Gross State Product articles, November 2001

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REIS, Regional Economic Information System, 1969-1999, May 2001 (CD-ROM only)

Comprehensive Revision of Local Area Personal Income: Revised Estimates for 1969–97 and New Estimates for 1998, SCB, July 2000

Comprehensive Revision of State Personal Income: Revised Estimates for 1969–98 and Preliminary Estimates for 1999, SCB, June 2000

State Personal Income, 1929–97, May 1999

Comprehensive Revision of Gross State Product by Industry, 1977–94, SCB, June 1997

Local Area Personal Income, 1969–92, September 1994

Industry

Annual Input-Output Accounts of the US Economy, 1998, SCB, December 2001

Improved Estimates of Gross Product by Industry for 1947-98, SCB, June 2000

Annual Input-Output Accounts of the US Economy, 1996, SCB, January 2000

Methodology and Appendixes, Benchmark Input-Output Accounts of the United States, 1992, September 1998

US Travel and Tourism Satellite Accounts for 1992, SCB, July 1998

US Transportation Satellite Accounts for 1992, SCB, April 1998

Gross Product by Industry Price Measures, 1977-96, SCB, March 1998

International

US International Transactions: Revised Estimates for 1989-2000, SCB, July 2001

US International Transactions, Revised Estimates for 1982-99, SCB, July 2000

US International Transactions, Revised Estimates for 1982-98, SCB, July 1999

US International Transactions in Private Services: A Guide to the Surveys Conducted by BEA, March 1998

A Guide to BEA Statistics on US Multinational Companies, March 1995

The Balance of Payments of the United States: Concepts, Data Sources, and Estimating Procedures, May 1990

A Guide to BEA Statistics on Foreign Direct Investment in the United States, February 1990

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Planned Revisions and Revision Studies

BEA primarily collects data from other statistical agencies (mostly other Federal statistical agencies) as well as firms, conducts research and analysis, develops and implements estimation methodologies, and disseminates statistics to the public. Because BEA receives its source data over time, BEA provides a series of estimates that are routinely revised to reflect more complete source data. For example, in regard to the GDP estimates, there are three current quarterly estimates that are made for each quarter. These are labeled, in sequence, advance, preliminary, and final estimates. Comprehensive policy on revisions informs the public of both printed and Web-based publications of our revisions. Descriptions of BEA's planned revision procedures are located in separate publications covering many aspects of a program, including methodology, source data, and updates in the SCB articles and on our Web site. Regarding revisions, descriptions in news releases routinely place any revision in the context of recent revisions in the estimate and provide a comparison with overall average revisions. Also a discussion of the assumptions used for source data not yet available/sources of revisions is routinely described in the technical notes section both in news releases and annual and comprehensive revision articles. In addition, BEA undertakes periodic revision studies that examine the accuracy of the estimates over time and for the existence of any systematic overstatement or understatement. Such studies are an important vehicle for BEA to ensure the quality of the estimates. Furthermore, users of BEA data are able to use the findings of these studies to better understand the nature of the BEA estimates. The web links are provided below.

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Links to Relevant Articles and Papers

National

Fixed Assets and Consumer Durable Goods for 1925-2000, SCB, September 2001

Annual Revision of the National Income and Product Accounts: Annual Estimates, 1998-2000, and Quarterly Estimates, 1998:I-2001:I, SCB, August 2001

Improved Estimates of the NIPA's for 1929-99: Results of the comprehensive revision, SCB, April 2000

Fixed Assets and Consumer Durable Goods--Estimates for 1925-98 and New NIPA Table: Changes in Net Stock of Produced Assets, SCB, April 2000

Improved Estimates of the National Income and Product Accounts for 1959-98: Results of the Comprehensive Revision, SCB, December 1999

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State Personal Income, Revised Estimates for 1998–2000, SCB, October 2001

Gross State Product by Industry, 1992–99, SCB, August 2001

Comprehensive Revision of Local Area Personal Income: Revised estimates for 1969–97 and new estimates for 1998, SCB, July 2000

Comprehensive Revision to State Personal Income Estimates 1969–98, SCB, June 2000

Comprehensive Revision of Gross State Product by Industry, 1977–94, SCB, June 1997

Industry

Gross Domestic Product by Industry for 1998-2000, SCB, November 2001

Improved Estimates of Gross Product by Industry for 1947-98, SCB, June 2000

International

US International Transactions: Revised Estimates for 1989-2000, SCB, July 2001

US International Transactions, Revised Estimates for 1982-99, SCB, July 2000

US International Transactions, Revised Estimates for 1982-98, SCB, July 1999

US International Transactions in Private Services: A Guide to the Surveys Conducted by BEA, March 1998

The Balance of Payments of the United States: Concepts, Data Sources, and Estimating Procedures, May 1990

Revisions Studies - National

Reliability of GDP and Related NIPA Estimates, SCB, January 2002

Reliability of the Quarterly and Annual Estimates of GDP and Gross Domestic Income, SCB, December 1998

Reliability and Accuracy of the Quarterly Estimates of GDP, SCB, October 1993

Revisions Studies - Regional

Evaluation of the State Personal Estimates, SCB, December 1990 (In print only)

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Integrity

The OMB information quality guidelines refer to integrity as maintaining the security of information, that is, protection of the information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. To that end, BEA follows the integrity guidelines determined by the Department of Commerce and OMB and ensures that there is no pre-release access to information. All electronic information disseminated by BEA adheres to the standards set out in Appendix III, "Security of Automated Information Resources," OMB Circular A-130; the Computer Security Act, and the Government Information Systems Reform Act. Confidentiality of data collected by BEA is safeguarded under Titles 15 and 22 of the US Code. However, the integrity of BEA goes beyond the maintaining of the security of its information and includes our openness to the public by providing published materials on our source data, methods, planned revisions; the transparency of our estimates by providing assumptions for missing source data and discussion of our revisions; and our adherence to best practices in producing our estimates (e.g., through the use of checklists in validating our source data, ensuring our estimates make economic sense, and providing clear and concise tables, charts, and description of the topic).

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Information Not Subject to These Information Quality Guidelines

- Procedural, operational, and policy manuals and other information prepared for the management of agency activities;
- Program publications, such as pamphlets and notices that explain BEA programs;
- Reports identified as not representing BEA positions; and
- Archival information disseminated by BEA before October 1, 2002, and is still maintained by BEA.

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Requests for Corrective Action

A. Requests to correct information

Any person affected by the disseminated information, may request, where appropriate, timely correction of such information that does not comply with OMB, DOC or BEA guidelines. There must be a link between the benefit or harm by the disseminated information. An affected person would submit a request for such action directly to the Office of the Chief Statistician.

An <u>affected person</u> means any person or entity that uses, benefits from or is harmed by the disseminated information. <u>Person</u> means an individual, partnership, corporation, association, public or private organization, or State or local government.

The burden of proof is on the requester to show the necessity and efficaciousness of correction sought. Additionally, requests that are duplicative, repetitious, or frivolous may be rejected.

In cases where BEA disseminates a study, analysis, or other information prior to the final action or information product, requests for correction will be considered prior to the BEA action or information product in those cases where BEA has determined that an earlier response would not unduly delay issuance of the agency action or information product and the complainant has shown a reasonable likelihood of suffering actual harm from the agency's dissemination if the agency does not resolve the complain prior to the final agency action or information product.

B. Procedures for request for correction

- A request for correction of disseminated information must be in writing. You may initiate such a request by: (1) mail to
 the Office of the Chief Statistician, Attn: Information Quality Guidelines, Bureau of Economic Analysis, BE-7, 1441 L
 St., NW, Washington DC 20230, (2) fax at (202) 606-5311, or (3) by answering the corrections request form on BEA's
 Web site.
- 2. No request for correction will be considered under these procedures concerning:
 - a. a matter not involving "information," as that term is defined in OMB's guidelines;
 - b. an explanation of information that has not actually been "disseminated," as that term is defined in OMB's guidelines; or
 - c. an explanation of disseminated information the correction of which would serve no useful purpose. For example, correction of disseminated information would serve no useful purpose with respect to information that is not valid, or useful after a stated short period of time (such as an estimate that has a planned revision). This limitation would not, however, preclude a request for correction alleging a systemic problem resulting in consistent errors in the information disseminated.
- 3. At a minimum, initial requests **must** include:
 - a. the requester's current home or business address, telephone number or electronic mail address (in order to ensure timely communication);
 - b. an explanation of why the requester believes that:
 - 1. BEA misapplied its guidelines in the disseminated information;
 - 2. the misapplication resulted in information that is not correct;
 - 3. the requester is affected by the dissemination of the information; and
 - c. an accurate citation to or description of the particular information disseminated which is the subject of the request including: the date and information source from which the requester obtained the information, the point and form of dissemination; an indication of which office or program disseminated the information (if known); and any other details that will assist in identifying the specific information which is the subject of the request.

- 4. Upon receipt of an initial request, the Office of the Chief Statistician will notify the requester of the office's receipt of the request for correction as soon as administratively possible.
- 5. The Chief Statistician, or otherwise designated individual, will usually respond to the requester within 60 calendar days. The time period for a response will depend on the information at issue. If the request requires more than sixty days to resolve, the Chief Statistician will inform the complainant that more time is required and indicate the reason why and an estimated decision date. The Chief Statistician will make a determination whether the request has merit. A request for correction will be determined to have merit if it is based on the strength of the information in fulfilling the requirements in B3. There is no appeal from a determination that a request does not have merit.

C. <u>Decision</u>

1. Acceptance of request

If corrective action is appropriate, corrective measures may take a number of forms, including, but not limited to: press releases and posting on an appropriate website, or withdrawal of the information in question. A determinant of the type of corrective action will be based on the nature and timeliness of the information involved and such factors as the significance of the error.

2. <u>Denial of request and appeal procedure</u>

Any person receiving a denial of a request to correct information may file a written appeal of such denial, which must be received by the Director of BEA at the address listed in paragraph B.1 within thirty calendar days of the date of the denial of the request. The appeal must include a copy of the original request, any correspondence regarding the initial denial, and a statement of the reasons why the requester believes the initial denial was in error. No opportunity for personal appearance, oral argument, or hearing on appeal is provided. The Director will usually respond to the requester within sixty days. If the request requires more than sixty days to resolve, the Director will inform the complainant that more time is required and indicate the reason why and an estimated decision date. The time period for a response will depend on the information at issue. The decision of the Director is final.

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