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GUIDELINES FOR IMPLEMENTATION OF INFORMATION QUALITY LAW

1. Purpose and Scope: The guidelines contained within apply to information disseminated to the public in any medium, including textual, graphic, narrative, numerical, or audiovisual forms and information that agencies post on the Internet. These guidelines also apply to Bureau of Engraving and Printing (Bureau/BEP) sponsored distribution of information – where the agency directs a third party to distribute information or the agency has the authority to review and approve the information before release.

These guidelines do not override other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections. These guidelines do not apply to hyperlinks to information that others disseminate, nor do they apply to opinions where the agency's presentation makes it clear that the material is an opinion or the agency's views rather than fact. In addition, these guidelines do not apply to information disseminated in the following contexts:

- a. Government employees or agency contractors or grantees;
- b. Intra- or inter-agency use or sharing of government information;
- c. Correspondence with individual persons, press releases, archival records, public filings, subpoenas or adjudicative processes; or
- d. Response to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar laws.

These guidelines are effective as of October 1, 2002 and cover information disseminated on or after October 1, 2002, regardless of when the information was first disseminated.

2. References:

- a. Freedom of Information Act of 1974, 5 United States Code (USC) 552;
- b. Privacy Act of 1974;
- c. Public Law 92-463, "Federal Advisory Committee Act," Section 1, 86 Stat. 770, October 6, 1972 ;
- d. Public Law 106-554, "Treasury and General Government Appropriations Act for Fiscal Year 2001," Section 515, December 21, 2000;

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- e. Paperwork Reduction Act (PRA) of 1995;
- f. Computer Security Act of 1987;
- g. Office of Management and Budget (OMB) Circular A-123, "Management Accountability and Control," June 21, 1995;
- h. OMB Circular A-127, "Financial Management Systems," July 23, 1993;
- i. OMB Circular A-130, "Management of Federal Information Resources," November 30, 2000; and
- j. Government Information Security Reform Act of 2000.

3. Background: The BEP disseminates a variety of information to the public. Section 515 of the "Treasury and General Government Appropriations Act for Fiscal Year 2001" [Public Law 106-554] requires Federal agencies to issue guidelines ensuring and maximizing the quality, utility, objectivity, and integrity of disseminated information.

The focus of Section 515 is on the Federal Government's information dissemination activities. Indeed, Federal agencies have disseminated information to the public for decades. Until recently, agencies have disseminated information principally by making paper copies of documents available to the public. In recent years, however, Federal dissemination has grown due to the advent of the Internet, which has ushered in a revolution in communications.

Section 515 builds upon the existing Government-wide responsibility to ensure information quality. According to the Paperwork Reduction Act (PRA), the agency Chief Information Officers (CIO) must manage information resources to "improve the integrity, quality, and utility of information to all users within and outside the agency, including capabilities for ensuring dissemination of public information, public access to government information, and protections for privacy and security."

4. Definitions:

a. **Utility.** Utility involves the usefulness and availability of the information to its intended audience. To produce useful, policy-relevant information, offices must stay informed of information needs and develop new data, models, and information products where appropriate. Offices will keep informed of information needs through active and ongoing contact with the community.

BEP's analytical and statistical publications and other information products will be reviewed by the responsible organization within BEP to ensure that they remain

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relevant and timely and that they address current information needs. On the basis of internal product reviews and consultation with users, and in response to changing needs and emphasis, the content of ongoing information products is changed, new products are introduced, and some products are discontinued.

BEP's information dissemination process will make information products widely available and broadly accessible. Most reports and other data products are available both as printed and electronic documents.

b. **Objectivity.** Objectivity involves a focus on ensuring that information is accurate, reliable, and unbiased and that information products are presented in a clear, complete, and well-documented manner. Objectivity is achieved by using reliable data sources and sound analytical techniques, by having information products prepared by qualified people using proven methods, and by carefully reviewing the content of all information products.

(1) **Use of reliable data sources.** Information products disseminated by BEP will be based on reliable, accurate data that have been validated. All data employed in the preparation of information products will be compiled using statistically sound procedures implemented by qualified professional staff. When analysis requires using samples from administrative data files, BEP will employ statistically acceptable methods to design and select the samples. Data samples are designed and compiled by staff knowledgeable about the content, structure, and limitations of the administrative data files employed. In addition, those staff members maintain working relations with agency personnel who create, update, and maintain those files to ensure that their understanding of files is current and complete. When information products require administrative files linked to external data sources, BEP will employ sound procedures for extracting and linking data from external sources based on a thorough understanding of the relevant components of the data sources.

(2) **Preparation of statistical estimates.** All estimation and sampling procedures will be prepared using statistically sound procedures designed by qualified professional staff. Samples are evaluated to ensure that the samples are representative. Specialists compare estimates with comparable information from prior years and from other sources to ensure reasonableness and reliability. Computer programs for sampling from files and using data from external data files are reviewed and tested by technical staff. Data files incorporating external data sources are reviewed to ensure that extraction and linkage processes have been implemented correctly.

Data sources, sampling errors, and disclosure limitation methods will be documented in publications, either for the publication as a whole or for individual tables. Documentation in BEP publications contains information on data sources including

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definitions and specifications of variables. Report documentation also includes, where appropriate, information on sampling errors and a description of rules or techniques for avoiding disclosure of confidential information.

(3) **Preparation of simulation models.** When BEP uses simulation models to estimate the effect policy and legislation have on government revenue, the models are based on BEP's best judgments of current and future behavioral relationships and methods of projecting key program outcomes. For all simulation models, implementation procedures will be tested, and the models' performance will be thoroughly evaluated. All simulation models will be extensively tested and reviewed within BEP to verify that the computer programs that were developed to implement models conform to the stated objectives. Where appropriate, historical simulations will be developed to evaluate the success of a model in producing reasonable projections. Models will be periodically updated to reflect input from internal and external reviews and research findings on behavioral relationships.

(4) **Preparation of analytical reports and policy studies.** Analytical reports will be prepared by subject specialists who use sound statistical and analytic methods and are knowledgeable about the data sources and models being used. A variety of analytical techniques ranging from simple tabulations and descriptive summary statistics to multivariate statistical methods and econometric models will be used to prepare reports. Staff preparing analytical reports and policy studies will be expert in their use of relevant data files, external data sources, and projections from simulation models.

Analytical techniques will be reviewed to ensure that they are appropriate for the data and the analysis to which they are applied, and they will be documented. Qualified staff will review all analytical reports and policy studies to ensure that the analysis is valid, complete, unbiased, objective, and relevant. When analyses are based on projections from simulation models, the assumptions used to produce the projections will be identified as well as the rationale for the assumptions used and the impact of using alternative assumptions.

(5) **Editorial review for accuracy and clarity of information in publications.** All information products will be edited and proofread before release to ensure clarity and coherence of the final report. Text will be edited to ensure that the report is easy to read and grammatically correct, thoughts and arguments flow logically, and information is worded concisely and lucidly. Tables and charts will be edited to ensure that they clearly and accurately illustrate and support points made in the text and include concise but descriptive titles. Tables and charts will indicate the unit of measure and the universe being examined, and all internal labels (column headings, row stubs, and panel headings) will accurately describe the information they contain. All

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changes made to a manuscript during the editing process will be checked by a proofreader and reviewed and approved by the author.

c. **Integrity.** Integrity, as used in the OMB quality guidelines, refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. To ensure the integrity of its information, BEP will employ rigorous controls that have been identified as representing sound security practices. BEP has in place programs and policies for securing its resources as required by the government information security laws. Those security procedures address all major components of information security and apply to all BEP operating components. In addition, BEP is subject to statutory requirements to protect the sensitive information it gathers and maintains on individuals. Those requirements are contained in the following documents:

- (1) Privacy Act of 1974;
- (2) Computer Security Act of 1987;
- (3) OMB Circulars A-123, A-127, and A-130; and
- (4) Government Information Security Reform Act of 2000.

d. **Transparent and Reproducible.** The guidelines focus on reports, studies, and summaries prepared for public dissemination and used in formulating broad program policy. For the purpose of these guidelines, transparency refers to a clear description of the methods, data sources, assumptions, outcomes, and related information that will allow a data user to understand how an information product was designed and produced. Reproducibility of information refers to the ability, in principle, for a qualified individual to use the documentation of methods, assumptions, and data sources to achieve comparable findings. In practice, opportunities for direct reproducibility are often limited by restrictions on access to confidential information.

BEP will make the information it disseminates and the methods used to produce this information as transparent as possible so that it can, in principle, be reproducible by qualified individuals. There shall be clear documentation of data and methods used in producing estimates and projections. Some statistical publications are based on publicly available data, and the computer programs that produce the statistics can be made available on request; accordingly, information in those publications is fully reproducible by the public. In addition, some estimates and projections included in BEP information products are not directly reproducible. Others may not be directly reproducible because of the complexity and detail of the methods and data. In those cases, greater emphasis is placed on periodic review and on documentation of methods, assumptions, data sources and related information. Information products that are deemed to have a greater impact on public policies are subject to more extensive internal review.

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5. Procedure to Seek Correction of Information Under Section 515. In accordance with Section 515 of Public Law 106-554, codified at 44 U.S.C. § 3516, BEP has developed a procedure to allow affected persons to seek and obtain correction of information BEP maintains and disseminates. Overall, OMB does not envision administrative mechanisms that would burden agencies with frivolous claims. Instead, the correction process would serve to address the genuine and valid needs of BEP without disrupting bureau processes. In making determinations of whether or not to correct information, BEP may reject claims made in bad faith or without justification. BEP is required to undertake only the degree of correction that they conclude is appropriate for the nature and timeliness of the information involved and explain such practices in the annual fiscal year report to Treasury.

Requests for correction of information must be submitted within a reasonable time from the initial data dissemination. This may vary according to the frequency by which the data are disseminated and will be determined by BEP officials.

a. To seek a correction of information under Section 515, parties must:

(1) State that the request for correction of information is submitted under Section 515 of Public Law 106-554.

(2) Include name, mailing address, telephone number and organizational affiliation, if any. (Optional - fax number and email address). This information is needed to respond to the request and contact parties, if required.

(3) Clearly describe the information you believe is in error and needs correction. Include the name of the report or data product where the information is located, the date of issuance, and a detailed description of the information to be corrected.

(4) State how the data affected you and how correction would benefit you.

(5) State specifically why the information should be corrected and, if possible, recommend specifically how it should be corrected. Provide supporting documentary evidence, such as comparable data or research results on the same topic, to help in the review of your request.

b. Based on a review of the information, BEP will:

(1) Determine whether a correction is warranted, and, if so, what action to take. The nature, influence, and timeliness of the information involved, the significance of the correction on the use of the information, and the magnitude of the correction will determine the level of review and any corrective action.

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(2) Respond by letter, e-mail, or fax. The response will explain the findings of the review, and the actions BEP will take.

(3) Respond to the request for correction of information within sixty calendar days of receipt. If the request requires more than sixty calendar days to resolve, the interested party will be notified that more time is required, the reason for the additional time, and include an estimated decision date.

Right to Appeal Decision

If the request for correction of data is denied, parties will be informed of their rights to an administrative appeal and how to apply for it.

Appeals must be submitted to BEP within 45 calendar days of receipt of the denial letter. BEP will respond to requests for correction of information within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, you will be notified that more time is required, state the reason why, and include an estimated decision date.

An official independent of the initial response will render final judgment of the appeal.

How to Submit a Request

Requests for correction, and requests for appeal, of information under Section 515 must be in writing and sent to BEP by mail, fax, or e-mail at the following address:

Mail: Bureau of Engraving and Printing
Manager, External Affairs Division
Information Quality Program, Room 104-2M
14th and C Streets, SW
Washington, DC 20228

Fax: (202) 874-3432

Email: travis.alford@bep.treas.gov

5. Privacy Act Statement:

We are authorized to collect the information you provide under Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law No. 106-554 codified at 44 U.S.C. § 3516). It is needed to process your request and allow us to reply accordingly. You do not have to furnish the information, but failure to do so may prevent your request from being processed. The information you furnish is

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rarely used for any purpose other than to process and respond to your request. However, we may disclose information you give us (e.g., to Congressional Office, or Department of Justice) if authorized or required by Federal law, such as the Privacy Act.

6. Reporting Requirements. The Office of External Relations will maintain records on complaints beginning on October 1, 2002, and retain the statistics necessary for the mandatory annual reports to the Department of Treasury and OMB.

7. Office of Primary Responsibility. Office of External Relations.

<SIGNED>

Thomas A. Ferguson
Director

Distribution: The public