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GSA's Information Quality Guidelines for Section 515

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GSA Guidelines

The General Services Administration (GSA) provides information to the public about the current experience of GSA programs, the projected scope and impact of GSA programs in the future, and the effect of proposed changes to regulations involving GSA. Information products describe the impact of GSA programs on our economy, beneficiary populations, other government agencies, and demographic and economic information on client agencies. GSA's information products are used by government planners, vendors, policymakers, economists, the media, and the public to analyze GSA's product lines and services and their impact on the United States.

Information released by GSA is developed from reliable data sources utilizing accepted methods for data collection and is based on thoroughly reviewed analyses and models.

Pre-dissemination review procedures. The guidelines below describe procedures that GSA employs to assure the quality of its information products, including their utility, objectivity, integrity, transparency, and reproducibility prior to disseminating information to the public.

1. Utility. Utility involves the usefulness of the information to its intended users. Utility is achieved by staying informed of information needs and developing new data, models, and information products where appropriate.

Based on internal analyses of information requirements, convening and attending conferences, working with advisory committees, and sponsoring outreach activities, GSA keeps abreast of information needs with respect to the analyses of GSA programs. We base our analyses on the Office of Management and Budget (OMB) generic standard (Guidelines

for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies; Republication - February 22, 2002), which GSA has adopted as a preferred standard.

We also employ GSA administrative data, and surveys by other federal agencies or established survey organizations. When major needs for data related to GSA populations are identified, GSA conducts special-purpose surveys to address these needs. GSA's ongoing publication series and other information products are reviewed to ensure that they remain relevant and address current information needs. Based on internal product reviews, consultation with users, and in response to changing needs and emphases, content of ongoing information products is changed, new products are introduced and others discontinued. GSA prepares special reports and topical studies that address emerging information needs stemming from proposed changes in the law and related policy debates.

GSA also identifies requirements for simulation models based on generally accepted statistical, financial, and scientific standards to support the preparation of analytic reports and policy studies, and modifies current models or develops new models accordingly. Where appropriate, contact information is available on each publication (and in some cases on each table of a publication) to allow feedback and questions by users. In addition, GSA's Office of the Chief Information Officer has recently begun a periodic customer satisfaction survey to obtain input and guidance by users.

2. Objectivity. Objectivity involves a focus on ensuring that information is accurate, reliable and unbiased and that information products are presented in an accurate, clear, complete and unbiased manner. Objectivity is achieved by using reliable data sources and sound analytical techniques, and preparing information products that use proven methods by qualified people who carefully reviewed those products.

· Use Reliable Data Sources

Much of the information disseminated by GSA is based on GSA administrative data files. These files contain information used to manage GSA programs, including data to determine product and service pricing and to compute lease payments. GSA's individual service and staff offices conduct ongoing reviews of GSA data systems to ensure accuracy. In support of these activities, GSA employs outside contractors to review GSA's quality control methodology and processes to confirm the validity of its review processes. GSA administrative data are also covered under GSA's Financial Management Systems and conform to the high standards of financial accountability demanded by these Systems. These financial management systems are mandated by the Office of Management and Budget and are designed to provide complete, reliable, consistent, timely and useful management information to enable agencies to carry out their fiduciary responsibilities.

GSA-sponsored surveys are conducted using methodologies that are consistent with generally accepted statistical, financial, and scientific standards for all aspects of survey development, including sample frame development, statistical design of the survey sample, questionnaire design and testing, data collection, sampling and coverage errors, non response analysis, imputation of missing data, weights and variance estimates. GSA surveys follow guidelines and policies set forth in the Paperwork Reduction Act and other regulations related

to the conduct of government surveys. GSA also prepares information products using data produced or maintained by other federal agencies and established survey organizations. All such external survey and administrative data used by GSA are produced using generally accepted scientific and statistical methodologies.

Where samples from administrative data files are employed for analysis, sound statistical methods are employed to develop samples. Staff producing statistical publications are knowledgeable about the content, structure and limitations of the administrative data files and maintain working relations with staff who create, update and maintain these files. Where administrative files are linked to surveys for analysis, sound procedures for extracting and linking external data files are developed and tested by technically qualified staff. Samples from administrative files are evaluated to ensure that samples are representative of the underlying administrative data files. Estimates prepared from external data sources are reviewed to ensure that the data extraction and linkage processes were implemented correctly.

- Use Sound Analytic Techniques

Analytical reports are prepared using a variety of analytical techniques from simple tabulations and descriptive summary statistics to multivariate statistical methods and econometric models. Analytical techniques are reviewed for their appropriateness to the data and the analysis being conducted and are clearly identified in reports.

GSA utilizes several simulation models, based on accepted statistical, financial, and scientific standards, to make estimates of the effects of economic trends and legislative and policy options on GSA products and programs now and in the future. Some simulation models have been or are being developed within GSA. Others are being developed under contracts. All contracts to develop simulation models provide for detailed documentation that describes the goals and objectives of the model, the data sources being used and the methodologies and assumptions employed. Contract reports are being made available on the Internet. Documentation is available for some simulation models that have been developed within GSA and will be prepared for others.

All simulation models are extensively tested and reviewed within GSA to verify that the computer programs that were developed to implement the model conform to the stated objectives. Where appropriate, historical simulations are developed to evaluate the success of a model in producing reasonable projections. Periodically, technical advisory committees are convened to review a model's performance to help evaluate whether it meets its objectives.

Simulation models are based on GSA's and its contractor's best judgments of current and future business relationships and methods of projecting key program outcomes. These models are periodically updated to reflect input from internal and external reviews and research findings on economic and product relationships.

- Preparation of analytical reports and policy studies

Information contained in analytical reports and policy studies is based on estimates derived from reliable administrative data files and external data sources. Analysts apply sound statistical, financial, scientific, and analytical techniques and

are knowledgeable about the data sources and models being used.

All data sources are identified. When analyses are based on simulation model projections, the assumptions used to produce the projections are also identified as well as the rationale for the assumptions used and the impact of using alternative assumptions.

All analytic reports and policy studies are reviewed by technically qualified staff to ensure that analysis is valid, complete, unbiased, objective, and relevant. Analytic reports and policy studies considered to be more technically complex are also reviewed by subject matter experts outside of the originating component, to provide additional perspective and expertise.

- Editorial review for accuracy and clarity of information in publications

All information products are edited and proofread before release to ensure clarity and coherence of the final report. Text is 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 are 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 clearly indicate the unit of measure and the universe being examined and all internal labels (column heads, row stubs, and panel headings) should accurately describe the information they contain. All changes made to a manuscript during the editing process are checked by a proofreader and reviewed and approved by the author.

- Policy for correcting errors

If an error is detected before an initial mailing, GSA includes an errata notice with the mailing. If the mailing has been sent out, GSA issues an errata sheet with all subsequent publications, and as appropriate, sends the errata sheet to all those who received the initial notice. Errata notices are put on the first page of the Web version to inform both new and repeat site visitors about the mistake, and the corrected version of the document is posted on the Web.

3. Integrity. Integrity 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 administrative information, GSA has in place rigorous controls that have been identified as representing sound security practices.

GSA is highly protective of the confidentiality of information it holds through its policies and practices. GSA administers financial and product programs that touch the operations of almost every government agency and many vendors. GSA has in place programs and policies for securing GSA resources as required by the Government Information Security Reform Act (P.L. 106-387, Title X, Subtitle G). These security procedures address all major components of information security and apply to all GSA operating components.

GSA is subject to statutory requirements to protect the sensitive information it gathers and maintains on companies, products, and services. These requirements are contained in the following documents:

Privacy Act of 1974
Computer Security Act of 1987
Office of Management and Budget (OMB) Circulars A-123, A-127 and A-130
Government Information Security Reform Act
Federal Managers' Financial Integrity Act (FMFIA) of 1982

Paperwork Reduction Act. It is important that GSA organizational elements make use of OMB's Paperwork Reduction Act (PRA) clearance process to help improve the quality of information that the GSA organizational elements collect and disseminate to the public. For all proposed collections of information which will be disseminated to the public, GSA organizational elements should demonstrate in their PRA clearance submissions to OMB that the proposed collection of information will result in information that will be collected, maintained, and used in a way consistent with the OMB and GSA information quality guidelines.

4. Transparency and Reproducibility. If an agency is responsible for disseminating "influential" information, guidelines for dissemination should include a high degree of transparency about data and methods to facilitate its reproducibility by qualified third parties. Information is considered influential if it will have a substantial impact on important public policies or important private sector decisions. Since much of GSA's statistical and analytical information products potentially have an impact on important public policies, GSA's information that is subject to Section 515 should be highly transparent and capable of being reproduced by qualified persons.

GSA's guidelines call for identification and documentation of data sets used in producing estimates and projections and clear descriptions of methods used to produce estimates and to develop model projections to make its results as transparent as possible. Many estimates and projections included in SSA information products are not directly reproducible by the public because the underlying data sets used to produce them are confidential. However, some statistical publications that are based on publicly available data and whose programs are made available on request are fully reproducible by the public. And GSA is in the process of developing public-use versions of several data files, which will increase the reproducibility of estimates and projections to the extent possible while still protecting confidentiality. Some estimates and projections may not be easily reproduced by third parties due to the complexity and detail of the methods and data. In these cases greater emphasis is placed on periodic review by outside panels of technical experts.

GSA also achieves transparency through wide dissemination of its information. Most reports and other data products are available both as printed and electronic documents. They are announced on the GSA web site and most electronic versions can be accessed and downloaded directly from the GSA web site. All documents posted on our Web site since June 21, 2001, are Section 508 compliant, making information available to an audience that includes persons who have a visual impairment and read online using assistive technology.

5. Procedures for seeking correction of information. To seek a correction under Section 515 of information maintained or disseminated by GSA, follow the procedures described below in sending a letter to GSA: via regular mail - GSA, Section 515, 1800 F St., NW, Rm. 2213, Washington, DC 20405; via email -

section515@gsa.gov; or via the data integrity correction sheet
- <http://www.gsa.gov/section515>.

a. Required information.

(1) Statement. Include a statement that the request for correction of information

is submitted under Section 515 of Public Law 106-554 .

(2) Requestor contact information. Include name, mailing address, fax number, or e-mail address, telephone number and organizational affiliation, if any. This information is needed to respond to your request and initiate follow-up contact with you if required. Do not send us your Social Security number.

(3) Description of incorrect information. Clearly indicate the information you

believe is in error and should be corrected. Describe the reasons why the

information is not consistent with GSA or OMB standards (OMB Standards

website:

<http://www.whitehouse.gov/omb/infereg/infopoltech.html>).

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.

Present substitute information, if any, with an explanation showing that such

information is consistent with the OMB guidelines and the GSA implementing

guidelines

(4) Reasons why information should be corrected. Include specific reasons why the information should be corrected and, if possible, specify how the information should be corrected.

Requests for correction that are specific and provide evidence to support the need for correction will help GSA provide a satisfactory response. Supporting documentary evidence, such as comparable data or research results on the same topic, will help in the review of the request.

(5) Address to send the request. The request for correction should be mailed to: GSA, Office of the CIO, Section 515, 1800 F St., NW, Room 2213, Washington, DC 20405, or emailed to section515@gsa.gov.

(6) Alternatively, any person seeking to correct Agency information may use an Internet browser to go to the GSA website, Information Quality Guideline web page:

<http://www.gsa.gov/section515>. On the Information Quality Guideline web page, click on the Data Integrity Correction Sheet. This page includes all the requested information needed for a request for correction. The Sheet may be filled out online and submitted to GSA by clicking on the submit button.

(7) A member of the public who files a request for correction under this paragraph has the burden of proof with respect to the necessity for correction as well as with respect to the type of correction requested.

(8) If a member of the public complains about information set forth or referenced in a GSA or GSA-sponsored document and does not request correction under the OMB or GSA guidelines, then the complaint is not subject to processing as a request for correction under those guidelines.

b. Review of the request. Based on a review of the information provided, GSA will determine whether a correction is warranted, and, if so, what action to take. Any corrective action will be determined by the nature and timeliness of the

information involved and such factors as the significance of the correction on the use of the information and the magnitude of the correction. GSA will respond to the requestor in writing within 60 days of receipt of the complaint. If the information quality complaint requires more than 60 calendar days to resolve, GSA will inform the complainant that more time is required and indicate the reason why, with an estimated decision date. GSA will respond to all requests for appeals within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, GSA will inform the complainant that more time is required and indicate the reason why, with an estimated decision date

(1) Incomplete requests. If a request for correction is incomplete, GSA may seek clarification from the person submitting the request or return it without prejudice to resubmission.

(2) Public notice of a request for correction. In selected cases, GSA may publish notice of the receipt of a request for correction and may invite public comment.

(3) Participation by other interested persons. By letter, GSA may invite or allow other interested persons to comment on a request for correction.

(4) Initial decisions. If the request for correction concerns information that GSA not involve a document subject to public comment, then the originating office of the GSA Element responsible for dissemination of the information should provide at least an initial response within 90 days (with a copy to the CIO). The response should contain a statement of reasons for the disposition.

(5) Administrative appeals. In the event GSA initially denies a request for correction of information not subject to public comment and the person who submitted the request would like additional review, then that person must submit a request for review, including a statement of reasons for modifying or reversing the initial decision, no later than 30 days from the date of that decision. A request for review under this paragraph must be submitted via e-mail to section515@gsa.gov, or by regular mail to Office of the Chief Information Officer (OCIO), Attention: Section 515, General Services Administration, 1800 F St., NW, Rm. 2213, Washington, DC 20405. The OCIO will direct the request for review to the GSA Element which supervises the originating GSA program office, and the GSA Element, with the concurrence of the Office of General Counsel, should issue a final decision for GSA (with a copy to the CIO) within 90 days from the date that the request for

review is received.

(6) Any corrective action will be determined by the nature and timeliness of the information and the magnitude of the error. GSA Organizational elements are not required to change, or in any way alter, the content or status of information simply based on the receipt of a request for correction. GSA Organizational elements need not respond substantively to frivolous or repetitive requests for correction. Nor do GSA Organizational elements have to respond substantively to requests that concern information not covered by the OMB or GSA Guidelines or from a person whom the information does not affect.

(7) If GSA determines that a request for correction of information not subject to public comment has merit, GSA may respond by correcting the information in question without issuing a decision explaining the reasons for accepting the request.

(8) If GSA receives multiple requests for correction of information not subject to public comment, GSA may consolidate the requests and respond on a GSA website, or by notice in the Federal Register, or by issuing a correction in similar form and manner as the original information was issued.

6. GSA Reporting Requirements. On an annual fiscal-year basis, the GSA CIO will report to the Director of the Office of Management and Budget concerning requests for correction received under these Guidelines. GSA organizational elements must designate a reporting official, except as agreed otherwise between the GSA organizational element and the CIO, for example, where the CIO might compile the data for the GSA organizational element. Where a GSA organizational element reporting official has been designated, that official must report to the CIO no later than November 1 every year concerning requests received during the previous fiscal year and their resolutions, including requests with regard to information subject to public comment. The first reports are due November 1, 2003. The CIO will compile the GSA consolidated report and submit it annually to OMB beginning January 1, 2004. GSA organizational element reports should contain the number of complaints received, nature of complaints (e.g., request for deletion or correction) and how they were resolved (e.g., number corrected, denied, or pending review). The report must also include a compilation of the number of staff-hours devoted to handling and resolving such complaints and preparing reports.

7. Privacy Act Statement. GSA is 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, note). This information is needed to process your request and allows 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 almost never used for any purpose other than to process and respond to your request, except to disclose information to a congressional office in response to an inquiry made on your behalf to the Department of Justice, a court, or other tribunal when the information is relevant and necessary to litigation, or to another Federal agency to help accomplish a function related to this process.

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