

Comment on CRE's Data Quality Interpretive Bulletin No. 1 - "Efficient Handling of Multi-Issue Complaints"

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The Center for Data Quality (C4DQ) recognizes that CRE is performing a crucial public service by comprehensively tracking and commenting on the response of federal agencies to OMB's data quality guidelines. In particular, we believe that CRE's Data Quality Interpretive Bulletins can provide a valuable forum for CRE, federal agencies, and a variety of affected parties to contribute to the ongoing interpretation and clarification of the intent implications of the OMB guidelines.

We've observed that thus far most of the commentary and interpretation has focused on reactive, post-dissemination policies and procedures: i.e., how agencies can most appropriately and effectively respond to potential challenges and complaints about information quality after that information has been disseminated. Of course, this is a critical component of the OMB guidelines that must be addressed by all agencies.

C4DQ would like to see a similar level of focus and commentary brought to proactive, pre-dissemination policies and procedures; that is, what can and should agencies do to build quality into their information before it is disseminated. Section III.2 of the OMB guidelines clearly addresses this point: "As a matter of good and effective agency information resources management, agencies shall develop a process for reviewing the quality (including the objectivity, utility, and integrity) of information before it is disseminated. Agencies shall treat information quality as integral to every step of an agency's development of information, including creation, collection, maintenance, and dissemination. This process shall enable the agency to substantiate the quality of the information it has disseminated through documentation or other means appropriate to the information."

Through our experience designing and implementing data quality management programs for numerous federal agencies and commercial organizations, we've observed that the best practices in proactive data quality management build quality into mission-critical information resources throughout the information life cycle: from initial data entry through pre-dissemination quality reviews. In order to comply with Section III.2 of the OMB guidelines, federal agencies will need to establish effective policies and procedures in areas such as these:

1. Ensuring that information collections are designed to yield high-quality data in compliance with OMB's data quality guidelines: How should agencies enhance the design and clearance of information collections to ensure compliance with the OMB guidelines? Will OMB now require a higher level of attention to information quality consideration in their review of proposed collections?
2. Establishing pre-dissemination quality review process for measuring and improving the quality of information: For all forms of disseminated information, what tools and methods can be used to measure quality levels? How will agencies determine acceptable levels of quality? What internal controls and processes will be required to ensure that poor-quality information is identified and corrected in a timely and effective manner? Pre-dissemination, agency-internal processes for identifying and correcting poor-quality data can and should mirror the post-dissemination processes called for by the OMB guidelines. The objective is to

identify and correct information quality problems before the information is disseminated, similar to well-established quality controls procedures used in a wide variety of manufacturing processes.

3. Documenting information quality: For all forms of disseminated information, how can quality be documented in a form that will be accessible to and meaningful to affected parties? Quality documentation should go hand-in-hand with standards for quality measurement. It is a form of communication between the “manufacturers” and “consumers” of information, similar to the labeling which accompanies many commercial products. In some cases, agencies (“manufacturers”) and affected parties (“consumers”) may need to jointly establish new terminology, metrics, and forms of documentation in order to communicate quality levels effectively.

The fact of the matter is that most organizations tend to give short shrift to proactive quality programs, unless forced to do so by regulation, competitive pressure, or other compelling factors. C4DQ is pleased to see that Section III.2 of the OMB data quality guidelines puts some force behind the proactive approach to information quality. We hope to see CRE and other interested parties participate with C4DQ in a continuing dialogue about this important side of the information quality equation.

Thank you.