

General Comment

We request that OMB work with the CIO Council and experts in the field on developing a comprehensive guide for determining the quality, utility, objectivity and integrity of information. How is OMB going to measure the success of this rule? That form of measurement should fall within some form of prescribed/recommended guidelines. Without those comprehensive guidelines, each federal agency will have its own definition of quality, etc.

Additional Resources

Has OMB considered the resource impact of these requirements? Has an ROI been performed? Is regulatory relief available to make resources available? The proposed rule places an additional function within the CIO organization without the promise of additional resources. Agencies are expected to achieve what is required (producing guidelines, facilitating admin structures for public redress, identify all current and future dissemination products, and tracking and reporting complaints etc.) with existing staff and processes.

Unrealistic Timeframe

All projects require planning, development, testing, and implementation. One year after the regulation goes into effect is insufficient time for such a major effort that encompasses every element of the Department, at home and abroad, and requires coordination with other agencies. We propose that the timeframe for implementation should be changed to at least 2 years.

Responses to Two OMB Questions

- 1) Should the OMB guidelines devote particular attention to specific types of information?

We believe it is imperative to distinguish **types/sources** of information, particularly since some types/sources have specific legislative or policy provisions that do not necessarily apply to the others. For example, information involving the agency in data collection from individuals or organizations has certain collection constraints, while information associated with individuals has associated privacy and confidentiality restrictions above and beyond general security considerations.

We also believe that the guidelines should focus attention on consumer/service oriented information affecting Americans' immediate quality of living. Criteria then could be developed on an objective basis to determine if it is "useful" and "unbiased."

- 2) Should OMB develop specific guidelines to address information that Federal agencies disseminate from a web page?

No specific guidelines for dissemination of information from a web site are needed. Any information posted on a web site should conform to whatever generic standards and guidelines that have been developed for any media.

Need to Define Terms and Set Criteria for Compliance

Under the Guidelines' "Section V. Definitions" it states:

"B. Whether the disseminated information is being presented in an accurate, clear, complete, and unbiased manner. . . . Sometimes, in disseminating certain types of information to the public, other information must also be disseminated in order to ensure an accurate, clear, complete, and unbiased presentation."

Other references throughout the proposed regulation refer the need for "objectivity" and "unbiased" information.

We are concerned that this can be widely interpreted to refer to public complaints with respect to disagreements with policy information dissemination. Overall, there is no definition of what is considered to be a complaint and no criteria for determining whether or not an agency is in compliance with the proposed. Criteria shared with all agencies is essential to enforcement of this regulation.

We propose that what is considered to be complaints are clearly defined in the regulation and also that they specifically should be considered complaints about concrete services provided to the public.