



Department of Energy
Washington, DC 20585

Ms. Brooke Dickson
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D.C. 20503

Dear Ms. Dickson:

The Office of the Chief Information Officer (CIO) of the Department of Energy (DOE), hereby, submits the enclosed comments in response to the June 28, 2001, Office of Management and Budget (OMB) Federal Register notice, "Proposed Guidelines for Ensuring the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" (66 FR 34489-34493). Please consider the comments as representing only the Office of the CIO, not the entire DOE. The Energy Information Administration (EIA) of the Department of Energy responded under separate cover.

If you would like to discuss the comments, please contact Susan Frey, Director of the Records Management Division, on 301-903-3666 or susan.frey@hq.doe.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard Landon".

Howard Landon
Acting Chief Information Officer

Enclosure



Enclosure

Office of the Chief Information Officer (CIO) Comments on
OMB's "Proposed Guidelines for Ensuring the Quality,
Objectivity, Utility, and Integrity of Information Disseminated by
Federal Agencies" (66 FR 34489-34493)

GENERAL COMMENT

OMB's definitions of quality, utility, objectivity and integrity

The definitions of quality, utility, objectivity, and integrity are very subjective and cause concern if these are different from industry standard definitions. There has been much work done on the meanings of these terms by the various national and international professional societies. These organizations developed the meanings via peer reviews. If there are conflicting definitions then the government could add value as an arbitrator. The purpose of the underlying law is to supply the public with information it needs, and therefore, the definitions should probably be selected from current sources.

The definitions could be taken from one of the recognized organizations such as American Society for Quality Control (ASQC), American National Standards Institute (ANSI), Institute of Electric and Electronic Engineers (IEEE), or International Standards Organization (ISO). The source of the definitions for Quality, Utility, Objectivity and Integrity should be referenced.

In addition, the definition of utility causes concern in that it assumes information that is disseminated should be useful for the general public. Expanding everything to be for public consumption negates the intended audience. How can an agency possibly anticipate all users of the information and then meet their needs? While the Federal government has a duty to make its dealings and information available to the public, making this information "useful" to a layman should not be a primary consideration. If the information is principally for internal use and is adequate for that purpose, the agency should not be held to a standard that the information be useful to the public.

If the performance of agencies is to be monitored against these criteria, then better definitions, accepted by industry, must be provided.

RESPONSES TO QUESTIONS IN "REQUEST FOR COMMENTS"

Whether the proposed guidelines have struck an appropriate balance.

The guidelines are intended to be generic enough to fit all media and not to be a detailed, prescriptive, "one-size-fits-all" government-wide guideline. This gives agencies

flexibility to develop appropriate guidelines for their information dissemination needs. Also, OMB has attempted to design the guidelines that can be applied in a common sense and workable manner.

The concern centers on the tracking and reporting requirements for correction of disseminated information that does not comply with OMB's guidelines. It is not clear what OMB wants the agencies to track and annually report on. Is it complaints received regarding agency compliance with OMB's guidelines or complaints received regarding the quality of information disseminated? What is a valid complaint? Just because the information doesn't meet the user's need doesn't necessarily mean that it isn't quality information. In addition, effectively tracking complaints will be very difficult. How can the agencies ensure that all complaints are tracked when the information dissemination vehicles are not all automated; and some, like web sites, are not centrally managed and are very numerous? Additional staff resources would be required to establish tracking procedures and to attempt to track the complaints, once the type of complaints was effectively defined.

2. If necessary, how the guidelines can be improved in this regard.

The reporting requirements should be removed. Requiring the Chief Information Officer (CIO) to report annually on behalf of the Department does not ensure that improvements are made. It can become another paper drill. Internal performance metrics on reduction of complaints could be instituted instead.

The guideline policy should instruct that "Quality" be strongly mandated from the top. Effective implementation of a quality program requires firm leadership from the top and often a change in the culture. This applies to information quality in addition to quality organizations in general.

PL 106-554, Section 515, also requires that besides policy guidance, procedural guidance shall be given. It is suggested the procedural guidelines follow a standard quality model for ensuring that the information disseminated by the Government is of high quality. An example is an architecture model that is used by the ISO based on the concept of layers.

Layer 1 Terminology:

Definitions, terms and vocabulary.

Layer 2 Overall Guide

Guidance giving advice on how the lower layers are to be applied.

Layer 3 Principles:

Specification of the objectives to be met.

Layer 4 Element Standards:

These will provide the basis for conformance.

Layer 5 Application Guides:

These are documents that interpret and elaborate on how the element standards may be applied in various situations. They also provide insight into the intentions of the element standards.

Layer 6 Toolbox of Techniques

These documents may be standards or guides and are intended to specify detailed requirements for specific techniques or methods that are referenced in the elemental standards.

The OMB should state that Layers 1,2,3 belong in the guidelines. OMB should also state what they would expect in the layers 4,5,6 so that the agencies' Chief Information Officers have a fair idea of what OMB would consider noncompliance and to ensure consistency and standardization.

The guidelines do not address the implications if the guidelines are not followed

3. Should the OMB guidelines devote particular attention to specific types of information or information dissemination products?

No, the OMB guidelines should specify that the agencies implement quality assurance processes for data/information that follow generally accepted principles defined by quality assurance organizations such as those mentioned in question one. The various agencies would then apply the imposed quality assurance requirements for the information work products they produce. Using these standards, the Federal CIO council with the GAO could perhaps generate recommended standards that will help reduce duplication between agencies.

4. If so, identify the areas where the specific focus should be directed

The OMB should not impose detailed requirements

5. Explain why the focus is needed or is desirable.

A general focus is needed covering the high level principles of quality assurance, not specifics. References to documents providing best practices could be cited in OMB's guidance so the same information isn't replicated in agency-specific guidance.

6. Describe any guidelines that you recommend for those areas.

The guidelines should state that the agencies implement quality assurance plans that meet the requirements of PL 106-554, section 515, in the dissemination of government information.

DOE has a Quality Assurance Order, which follows standard quality assurance guidelines, and it is applicable to all Departmental elements.

7. Should OMB develop specific guidelines to address the many types of information that Federal agencies disseminate from web pages?

No. OMB should reference quality assurance procedures that have been developed by other qualified organizational entities.

8. Is there any need to adapt these guidelines to an agency's use of web pages?

No, the information disseminated through web pages varies greatly by agency; therefore appropriate guidelines should be left to the discretion of the agencies.

9. If so, what guidelines are needed?

Again, the guidelines should stress the need to institute quality assurance processes, within all agencies including the OMB, such as the implementation quality assurance plans.