



"Ridgeway, Holly" <HRidgeway@FDIC.gov>  
08/09/2001 03:47:29 PM

Record Type: Record

To: Brooke Dickson Information Quality/OMB/EOP@EOP  
cc: See the distribution list at the bottom of this message  
Subject: FDIC Comments: Implementing Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001

---

August 8, 2001

MEMORANDUM TO: Brooke Dickson  
Office of Information and Regulatory Affairs  
Office of Management and Budget

FROM: Donald C. Demitros  
Chief Information Officer  
Federal Deposit Insurance Corporation

SUBJECT: Comments on OMB's Proposed Guidelines for  
Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of  
Information Disseminated by Federal Agencies

Thank you for the opportunity to comment on OMB's proposal for implementing Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001. The FDIC developed these comments following a thorough review of the proposal by the program divisions that are the primary disseminators of information, including Research and Statistics, Public Affairs, Consumer Affairs, and Bank Supervision.

Our responses to the two questions raised in the "Request for Comments" section of the notice are as follows:

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

\* The FDIC believes the guidelines are sufficient to implement the law. There does not appear to be a need for particular attention to specific types of information or information dissemination products, although it might be helpful if OMB made it clear that its guidelines cover only final information, and not information under development or preliminary data.

Should OMB develop specific guidelines to address information that

Federal agencies disseminate from a web page? Is there any need to adapt these guidelines to the agency use of a web page?

The FDIC believes the guidelines as currently proposed are sufficient to cover information disseminated from web pages; no adaptation appears to be needed.

In addition to these responses to the specific questions raised in the notice, the FDIC offers the following comments.

1. **Complaints and Administrative Mechanisms for Complaints:** The discussion of complaints and reporting of complaints is sufficiently broad to permit the FDIC to manage within the guidelines. We do not have suggestions for changing these proposed provisions. However, we might have serious concerns if the final guidance becomes more specific in this regard, or if it departs from OMB's current intention to build on existing agency responsibilities.

2. **Requirement that the CIO serve as Ombudsman:** The FDIC is comfortable with the provisions of the guidance relating to the CIO's role as Ombudsman for information matters. The CIO's oversight role in information management is clear and undisputed and as such the CIO is the appropriate individual in the FDIC to address all data management and data quality issues, concerns, or complaints and to resolve any issues or complaints directed to the FDIC.

3. **Agency Reporting Requirements:** The FDIC has well-established internal guidelines on the publication of information on the Internet, data stewardship, data sensitivity, and the protection and integrity of data, and the accuracy of information sent to regulated financial institutions. Reporting to OMB on these established guidelines should not be a major undertaking for the FDIC.

Message Copied To:

"Hanft, Steven F." <SHanft@FDIC.gov>  
"Klear, Patricia R." <PKlear@FDIC.gov>  
"Insko, Donald" <DInsko@FDIC.gov>  
"Callahan, Patricia" <PCallahan@FDIC.gov>  
"Phipps, William W." <WPhipps@FDIC.gov>  
"Barr, David" <DBarr@FDIC.gov>  
"Vaughn, Curtis" <CVaughn@FDIC.gov>  
"Norris, Bobbie Jean" <BjNorris@FDIC.gov>  
"Copa, Kymberly K." <KCopa@FDIC.gov>  
"Palau, Manuel A." <MPalau@FDIC.gov>