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Record Type: Record

To: Brooke Dickson Information Quality/OMB/EOP

cc:

Subject: RE: OMB Proposed Information Quality Guidance for public comment

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To: 'CENDI-PA list' <CENDI-PA@DTIC.MIL>

cc: Brooke Dickson/OMB/EOP, Directors <Directors@DTIC.MIL>

Subject: RE: OMB Proposed Information Quality Guidance for public comment

Here are DTIC's comments for a consolidated CENDI response:

To begin with, after several DTIC staff members have gone through the memo and draft guidelines, we are confused by some of the terms. In the background section the proposed guidance mixes together dissemination and collection issues when we think it really should to stick to dissemination.

Carlynn Thompson took the definitions section and reworked it as an example... this may not be perfect, but I think it makes the point.

The terms "Quality," "Utility," "Objectivity," and "Integrity" are never defined. I understand the problem of definition. The definitions sort

of talk about the concept of what it means... it is simply not clear.

One

approach that might be taken follows:

To simplify understanding of these Guidelines the four statutory terms, "quality," "utility," "objectivity," and "integrity," will

be referred to collectively, as "quality" because these are closely interrelated concepts. They are defined as.

Quality - Content that is accurate, written and plain language or presented in a clearly understood format and is complete without presentation errors.

Utility - Information that is helpful to users and can easily be interpreted and clearly understood.

Objectivity - Content that is presented in an unbiased manner, the results of which can be substantially reproduced by independent analysis. Source data that is in the public domain should be made available so that the public can assess for itself whether there may be some reason to question the objectivity.

Integrity - Information that has been protected from unauthorized access or revision, to ensure that the information is not compromised through corruption, or falsification.

The word transparency should be defined. I think it means -- the ease with which the public can interpret content and evaluate the benefits of government programs. An everyday use of the word would imply that it is clear.

Perhaps of greater concern to us is the issue of responsibility and adjudication. For example, DTIC like the other CENDI organizations is a secondary dissemination activity. We handle what originating activities provide. These activities are responsible for the information content quality, not DTIC. We are, however, responsible for maintaining the integrity of the information provided to us, even though the information may

not be accurate. We do this by using a type of hash total for each document we put into our electronic document storage system and verifying output documents against this hash. For fulltext documents available on our private

network (i.e. INTRANET) we encrypt the document transmission. We do not encrypt for documents on the public network (i.e. INTERNET) since not all browsers are capable of handling SSL encrypted documents.

Just as a library cannot be the guarantor of every volume in its collection,

neither can DTIC be responsible for the currency and accuracy of all the reports in its collection. We can, however, assure that before any report enters our collection, it has been accepted as a contract deliverable, a laboratory finding, a valid academic treatise, etc., by some element of DOD;

that it has been given a distribution statement; and that it has been found to be within the scope of DTIC's collection according to our published selection criteria.

With respect to the matter of "citizen review" of information maintained and

disseminated by the agency, if the public wishes to take issue with the content of any item in the DTIC collection to which they have access, they should do so as part of the standard tradition of scientific and technical discourse --that is, by publishing a rebuttal or commentary. At the most, DTIC should refer any requests for correction to the controlling office, and

should not maintain a record of complaints about the "objectivity, utility, and integrity" of items within the DTIC collection.

However, there are a lot of administrative requirements being levied in this proposal, such as reporting requirements, that we now do not have to do. Also, there is a requirement that administrative mechanisms be established so that the public may obtain correction of information maintained and disseminated that does not comply with OMB guidelines. Even if it's not our error to correct but that of the originator, we would have to administratively handle the complaint, response, etc. Another problem are such things as errata changes, addendum, superseded documents, document withdrawal because of content issue, etc. For documents downloaded from our public Website we keep no record of the recipient so we have no way to inform those who already received information from us when subsequent changes are made to the original document. DTIC will, of course, ensure that its own publicly accessible information products (e.g., its Homepage, publications, bibliographic products) comply with the OMB guidance for information quality. This, however, merely represents good information practice, and will not differ from any of our current procedures which include quality control.

Kurt

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