



Record Type: Record

To: Brooke Dickson Information Quality/OMB/EOP@EOP
cc:
Subject: FW: Comments on Proposed Data Quality Guidance

Attached please find the only comments that were submitted through our program from the Treasury bureaus regarding Section 515 of the Treasury & General Government app. Act for FY'01

Thank you for the opportunity to comment

-----Original Message-----

From: Haley, Terry [mailto:Terry.Haley@occ.treas.gov]
Sent: Thursday, August 02, 2001 2:27 PM

Cc: Carter, Liz
Subject: OCC Comments on Proposed Data Quality Guidance

After reviewing the Proposed Data Quality Guidance document, the OCC finds the guidelines vague and, at times, confusing.

1. Vague and unclear phrases or terminologies were often used

Example:

"...Allowing affected persons to seek and obtain correction of information maintained and disseminated by the agency that does not comply with these OMB guidelines" (pg 34490)

This statement implies that the public can seek corrections only on information that do not comply with OMB guidelines and that it is up to the public to be able to distinguish between information that can and cannot be reported for correction. The real bottom line is that federal agencies should have a mechanism in place that allows the public to seek and obtain correction of disseminated information regardless of whether or not the information is compliant.

Also questionable is what constitutes compliance? Information complying with OMB guidelines (i.e., quality, objectivity, utility, integrity elements) may inadvertently contain typos or minor errors that do not significantly impact the meaning or content. Does a request for correction change the status of the information from compliant to non-compliant?

2. Portions of the document were confusing. Improvement in organization

and presentation would assist in providing clarity and cohesiveness of content.

Example:

The objective is

"...to ensure and maximize the quality, objectivity, utility, and integrity of information disseminated by Federal agencies" (pg 34489).

These four criterias are not defined. However, further in the document, the "three aspects of information to be disseminated" (pg 34491) are mentioned. Could it be that by fulfilling these three aspects, the quality, objectivity, utility and integrity of information criterias will be met? (see below)

a) Information must be useful to all users from the perspective of the agency and the public

- does this addresses the utility criteria?

b) Information must be presented in an accurate, clear, complete, and unbiased manner; sources of the disseminated information must be identified.

- does this addresses the quality and objectivity criterias?

c) Information must be protected from unauthorized access or revision

- does this addresses the integrity criteria?

The guidelines seem to be slanted towards web information. The handling of electronic information may differ from hardcopy or traditional methods of dissemination. Special attention is needed for electronic information sources such as web pages.