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MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
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SUBJECT: Ensuring Quality of Information Disseminated to the Public by the
Department of Defense

This memorandum and its attachments comply with Section 515, Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554). The law directed the Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal Agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal Agencies." The OMB guidance was provided by Federal Register: January 3, 2002 (Volume 2, Number 67).

According to the OMB guidelines, a basic standard of quality (objectivity, utility, and integrity) must be maintained and appropriate steps taken to incorporate information quality criteria into DoD public information dissemination practices. DoD Components shall adopt standards of quality that are appropriate to the nature and timeliness of the information they disseminate.

This memorandum applies to the Office of the Secretary of Defense, Military Departments, Chairman of the Joint Chiefs of Staff, Combatant Commands, Inspector General of the DoD, Defense Agencies, DoD Field Activities, and all other organizational entities in DoD (hereafter referred to collectively as "DoD Components").

Attachment 1 prescribes policy and procedural guidance for DoD Components in ensuring the objectivity, utility, and integrity of information disseminated to the public. It assigns responsibilities, establishes administrative mechanisms for affected persons to

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seek and obtain correction of information maintained and disseminated by DoD Components and delineates public complaint reporting requirements. Attachment 2 defines terms and provides context and attributes of each term.

DoD Components are to immediately implement the guidance in Attachment 1 as integral to their information resource management procedures. The DoD CIO should review existing policies and guidance and take appropriate action in steps to codify the quality (objectivity, use and integrity) of information disseminated by the Department in the DoD Directives System.

[signature of appropriate authority]

Attachments:

1. Policy and Procedural Guidance
2. Definitions

**Ensuring the Quality of Information Disseminated to the Public
by the Department of Defense**

Policy and Procedural Guidance

1. Purpose:

This attachment:

1.1. Prescribes policy and procedures and assigns responsibilities for ensuring and maximizing the quality (objectivity, utility, and integrity) of information (hereafter referred to as "quality standards") disseminated to the public by the Department of Defense.

1.2. Issues guidelines that include administrative mechanisms for affected persons to seek and obtain correction of information maintained and disseminated by Department of Defense Components that does not comply with the quality standards.

2. Definitions:

Terms used in this attachment are defined in Attachment 2.

3. Procedures:

3.1. Underlying Principles:

3.1.1. The Internet enables DoD to communicate information quickly and easily to a wide audience. However, Internet communication also increases the potential harm that can result from the dissemination of information that does not meet basic information quality standards. At the same time, there are problems inherent in detailed, prescriptive, "one-size-fits-all" DoD-wide guidelines that require different types of dissemination activities to be treated in the same manner. These guidelines have been developed with the following principles in mind.

3.1.1.1. The guidelines apply to a wide variety of DoD information dissemination activities. They are generic in order to apply to a variety of media, printed, electronic, or other forms of publication.

3.1.1.2. Components should not disseminate substantive information that does not meet a basic level of quality. An additional level of quality is warranted in those situations involving influential scientific, financial, or

statistical information. The additional level of quality concerns a standard of care for influential scientific, financial, or statistical analytical results that are "capable of being substantially reproduced." This is discussed further in paragraph 3.2.4. below.

3.1.1.3. The guidelines are designed so that Components can apply them in a common sense and workable manner. It is important these guidelines do not impose unnecessary administrative burdens that would inhibit Components from continuing to take advantage of the Internet and other technologies to disseminate information to the public. In this regard, Components may incorporate the standards and procedures required by these guidelines into their existing information resources management (IRM) and administrative practices rather than create new and potentially duplicative or contradictory processes. Under these guidelines, Components must ensure their guidelines are consistent with these guidelines and their administrative mechanisms satisfy the standards and procedural requirements in these guidelines. Components may rely on their implementation of the computer security provisions of the Paperwork Reduction Act (PRA) of 1995 to establish appropriate security safeguards for ensuring the integrity of the information that they disseminate. Guidance contained in DEPSECDEF Memorandum Subject: Web Site Information Services DoD-Wide, dated November 25, 1998, and DoDD 5230.9, dated April 9, 1996, addresses DoD web site administration policies and procedures and clearance of DoD information for public release respectively.

3.2. Guidelines:

3.2.1. Components are directed to publish IRM procedures for reviewing and substantiating (by documentation or other means selected by Components) the quality standards of information before it is disseminated. In addition, Components are to publish administrative mechanisms allowing affected persons to seek and obtain, if appropriate, correction of disseminated information that does not comply with the quality standards.

3.2.2. Three substantive terms describe the quality of information disseminated by DoD and Components: utility, objectivity, and integrity. Definitions in Attachment 2 provide some context and attributes for these terms to enable Components and the public to judge whether a particular type or piece of information meets these attributes. "Utility" refers to the usefulness of the information to intended users including the public. When reviewing information for dissemination, Components must consider the usefulness of the information for its reasonable and expected application. "Objectivity" focuses on whether the

disseminated information is being presented in an accurate, clear, complete and unbiased manner and as a matter of substance, is accurate, reliable and unbiased. "Integrity" refers to security -- the protection of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification.

3.2.3. "Dissemination" refers to Component initiated or sponsored distribution of information to the public.

3.2.4. In cases of dissemination of general scientific and research information, technical information that has been subjected to formal, independent, external peer review is presumptively objective. However, this presumption is rebuttable based on persuasive showing by a complainant in a particular instance.

3.2.4.1. In dissemination of scientific or statistical information that is deemed influential, a higher quality standard than that of peer review is warranted. "Influential" when used in the context of scientific, financial or statistical information, means that the Component can reasonably determine that dissemination of the information will have or does have clear and substantial impact on important public policies or important private sector decisions. To ensure the objectivity of influential scientific, financial, or statistical information, it must be capable of being substantially reproduced. The reproducibility standard applicable to influential scientific, financial or statistical information is intended to ensure disseminated information is sufficiently transparent in terms of data and methods of analysis, that it would be feasible for a replication to be conducted. "Capable of being substantially reproduced" means that independent analysis of original or supporting data using identical methods conducted by qualified peer review would generate similar analytical results, subject to an acceptable degree of imprecision or error.

3.2.4.2. With regard to analysis of risks to human health, safety and the environment, Components responsible for dissemination of vital health and medical information shall interpret the reproducibility and peer review standards in a manner appropriate to assuring the timely flow of vital information to medical providers, patients, health agencies and the public.

3.2.5. Archival information disseminated by DoD and Component libraries (e.g., Internet distribution of published articles) are not covered by these guidelines; libraries do not endorse the information they disseminate. Components have not authored these documents nor adopted them as representing DoD's or Components' views. By disseminating these materials, Components are simply ensuring that the

public can have quicker and easier access to materials that are otherwise publicly available. These guidelines apply to information that a Component disseminates from a web page but do not include the provision of hyperlinks to information that others disseminate. These guidelines also do not apply to opinions where the Component's presentation makes it clear what is being offered is someone's opinion rather than fact or the Component's views, unless the Component represents the information as or uses the information in support of an official position of the Component. Components should use disclaimers to distinguish the status of information as they consider their information holdings.

3.2.6. Component dissemination of information prepared by an outside party in a manner that reasonably suggests the Component agrees with the information, renders Component dissemination of the information subject to these guidelines. However, a Component does not initiate the dissemination of information when a Component-employed scientist or Component grantee or contractor publishes and communicates his research findings in the same manner as his academic colleagues, even if the Component retains ownership or other intellectual property rights because the Component paid for the research. To avoid confusion regarding whether the Component agrees with the information, the researcher should include an appropriate disclaimer in the publication or speech to the effect that the views expressed are his own and do not necessarily reflect the views of the Component.

3.2.7. In contrast to paragraph 3.2.6. above, if the Component has directed a third party to disseminate information or retains the authority to review and approve the information before release, then the Component has sponsored the dissemination of the information.

3.3. Administrative Mechanisms:

3.3.1. DoD Components shall establish and make public, administrative mechanisms within the guidelines below, allowing affected persons to seek and obtain when proper documentation is provided and a need to know established, correction of information maintained and disseminated by the Component that does not comply with the quality standards. "Affected persons" are persons who may benefit or be harmed by the disseminated information. This includes persons who are seeking to address information about themselves as well as persons who use information. However, each Component shall determine whether a person, which includes groups, organizations and corporations, as defined by the Paperwork Reduction Act (PRA) of 1995, is or will be affected by the Component's information. These administrative mechanisms are not intended to

replace or supercede existing mechanisms that apply through other procedures. They also do not create substantive rights and are intended for administration only.

3.3.2. The correction process must serve to address the genuine and valid needs of the Component and its constituents without disrupting Component processes. In making their determination of whether or not to correct information, Components may reject claims made in bad faith or without justification and are required to undertake only the degree of correction that they conclude is appropriate for the nature and timeliness of the information involved.

3.3.3. The Public Affairs Activity (PAA) of each Component shall receive and resolve complaints regarding information that does not comply with the quality standards. The PAA may consult with the Component Chief Information Officer or designee during the process.

3.3.4. The PAA shall allow affected persons to request correction to publicly disseminated information to the extent that such information is not accurate, clear, complete or unbiased. Complaints must be in writing (electronic mail is acceptable), brief and simple, containing as a minimum the disseminating organization, location of the information, description of the information to be corrected, reason for the change and copies of available documented evidence supporting the request. A complaint shall not be required to be resubmitted unless additional information is essential to process the request. Whenever practical, a decision whether to reject the complaint or correct the information will be made within 30 days of receipt of the request.

3.3.5. The PAA shall promptly take one of the following actions on requests to correct the information:

3.3.5.1. If the PAA agrees with any portion or all of a complainant's request, he will notify the disseminator of the information that the correction must be made, and shall explain the substance of the requested correction. The PAA shall inform the requester, in writing, of the decision and the action taken.

3.3.5.2. If the PAA disagrees with all or any portion of a request, the complainant shall be informed promptly in writing of the refusal to correct the information, the reason for refusal and the appeal procedures as outlined in paragraph 3.3.7. below, including the name and address of the official to whom the appeal should be directed.

3.3.5.3. If the request for correction pertains to information originated, controlled or maintained by another DoD Component or Federal Agency, the request shall be referred to the appropriate Component or Agency and the requester advised of this in writing.

3.3.6. The following procedures shall be used when reviewing records under dispute:

3.3.6.1. In response to a request for correction of information, the PAA shall determine whether the requester has adequately supported the claim that the information is not accurate, clear, complete or unbiased.

3.3.6.2. The PAA shall limit the review of information to the aspect or aspects of the information that clearly bear on any determination to correct the information.

3.3.7. If a complainant disagrees with the Component determination, he may file an appeal in writing within 30 days of notification of the determination. The appeal shall be referred to the Component Chief Information Officer (CIO).

3.3.7.1. All appeals will be processed within 30 days unless the CIO determines that a fair review cannot be made within this time. If additional time is required, the appellant will be notified of the delay in writing at the expiration of the 30-day period. The notification shall include the reason for the delay and when the appellant may expect a decision on the appeal.

3.3.7.2. If after review, the CIO determines correction of the record as requested is unwarranted, the CIO shall advise the appellant of the denial and the reason and authority for the denial.

3.3.7.3. If after the review, the CIO determines that the information should be corrected in accordance with the appellant's request, the CIO shall direct the disseminator of the information to correct the record, and advise the appellant of the action taken.

3.4. Reporting Requirements:

3.4.1. On an annual fiscal-year basis, Components shall submit reports to the Assistant Secretary of Defense for Public Affairs (ASD(PA)) of the complaints received under this policy and guidance and their resolutions. Components must submit these reports no later than November 1 every year, including complaints received during the previous fiscal year. The first reports are due to ASD(PA)

November 1, 2003. ASD(PA) will compile the DoD consolidated report and submit it annually to OMB beginning January 1, 2004. Component reports shall consist of number of complaints received, nature of complaints (e.g., request for deletion or correction) and how they were resolved (e.g., number corrected, denied, or pending appeal). The report must also include a compilation of the number of public affairs man-hours devoted to handling and resolving such complaints and preparing reports.

4. Responsibilities:

4.1. The Assistant Secretary of Defense for Command, Control, Communications and Intelligence (ASD (C3I)) as the DoD CIO and the Assistant Secretary of Defense for Public Affairs shall:

4.1.1. Oversee implementation of the policy and procedures in this attachment.

4.2. The Heads of the DoD Components shall:

4.2.1. As information owners:

4.2.1.1. Establish basic quality standards with respect to publicly disseminated information consistent with these guidelines.

4.2.1.2. Publish a process consistent with these guidelines for reviewing the quality of information that allows substantiation of the quality of the information the Component has disseminated.

4.2.1.3 Publish administrative mechanisms consistent with these guidelines, that allows affected persons to seek and obtain where appropriate, timely correction of public information maintained and disseminated by the Component that may not be in compliance with the quality standards.

4.2.2. Designate the PAA of the Component to receive and resolve complaints regarding information that may not comply with the quality standards.

4.2.3. Designate the CIO of the Component as the appeal authority to receive and resolve requests for appeal.

4.2.4. Designate the PAA of the Component to maintain file records of each complaint that includes, at a minimum, copies of the original complaint, the response to the originator of the complaint, appeal resolution and results if applicable, and notification to the originator of appeal action.

4.2.5. Submit annual reports as required in paragraph 3.3.12 above.

4.3. The Assistant Secretary of Defense for Public Affairs (ASD (PA)) shall:

4.3.1. Compile the DoD annual report to OMB as required in paragraph 3.4.above.

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Definitions

1. Affected persons. Persons who may benefit or be harmed by the disseminated information. This includes persons who are seeking to address information about themselves as well as persons who use information. "Persons" includes groups, organizations and corporations as defined by the Paperwork Reduction Act (PRA) of 1995.
2. Dissemination. Component initiated or sponsored distribution of information to the public. Dissemination does not include distribution limited to government employees or component contractors or grantees; intra- or inter-component use or sharing of government information; and responses to requests for component records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar law. This definition also does not include distribution limited to correspondence with individuals or persons, press releases, archival records, public filings, subpoenas or adjudicative processes.
3. Influential. When used in the context of scientific, financial, or statistical information, means that the Component can reasonably determine that dissemination of the information will have or does have clear and substantial impact on important public policies or important private sector decisions. Each Component is authorized to define "influential" in ways appropriate given the nature and multiplicity of issues for which the Component is responsible.
4. Information. Means any communication or representation of knowledge such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition includes information that a component disseminates from a web page, but does not include the provision of hyperlinks to information that others disseminate. This definition does not include opinions, where the Component's presentation makes it clear that what is being offered is someone's opinion rather than fact or the component's views.
5. Information dissemination product. Any book, paper, map, machine-readable material, audiovisual production, or other documentary material, regardless of physical form or characteristic, a Component disseminates to the public. This definition includes any electronic document, CD-ROM, or web page.

6. Integrity. Refers to the security of information -- protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

7. Objectivity. Involves two distinct elements, presentation and substance.

7.1. "Objectivity" includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. The information must also be presented in the proper context. 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. Also, the Component needs to identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a scientific, financial, or statistical context, the supporting data and models, so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Where appropriate, supporting data should have full, accurate, transparent documentation, and error sources affecting data quality should be identified and disclosed to users.

7.2. In addition, "objectivity" involves ensuring accurate and reliable information. In a scientific, financial, or statistical context, the original and supporting data shall be generated, and the analytical results shall be developed, using sound statistical and research methods.

7.2.1. If the data and analytical results have been subjected to formal, independent, external peer review, the information can generally be considered of acceptable objectivity. However, this presumption is rebuttable based on persuasive showing by the petitioner in a particular instance.

7.2.2. In those situations involving dissemination of influential scientific, financial, or statistical information, a high degree of transparency of data and methods must be ensured to facilitate the reproducibility of such information by qualified third parties.

7.2.3. Components shall not require that all disseminated original and supporting data be subjected to the reproducibility requirement. Components may identify those particular types of data that can be practicably be subjected to the reproducibility requirement, given ethical, feasibility, or confidentiality constraints.

7.2.4. Making the data and models publicly available will assist in determining whether analytical results are capable of being substantially reproduced. However, these guidelines do not alter the otherwise applicable

standards and procedures for determining when and how information is disclosed. Thus, the objectivity standard does not override other compelling interests, such as privacy, trade secret, intellectual property, and other confidentiality protections.

8. Quality. An encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these four statutory terms, collectively, as "quality."
9. Reproducibility. The information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. For information judged to have more (less) important impacts, the degree of imprecision that is tolerated is reduced (increased). If Components apply the reproducibility test to specific types of original and supporting data, standards for replication of laboratory data shall be established. With respect to analytic results, "capable of being substantially reproduced" means that independent analysis of the original or supporting data using identical methods would generate similar analytic results, subject to an acceptable degree of imprecision or error.
10. Transparent/Transparency. Clear and concise.
11. Utility. Refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the Component disseminates to the public, the Component needs to consider the uses of the information not only from the perspective of the Component but also from the perspective of the public.