

# **U.S. Department of Education Draft Information Quality Guidelines**

## **Introduction**

In accordance with section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554), most Federal agencies, including the U.S. Department of Education, must have information quality guidelines for the purpose of “ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies.”

The Department’s Information Quality Guidelines, described below, must comply with government-wide guidelines issued by the U.S. Office of Management and Budget (OMB) on February 22, 2002. In summary, OMB’s guidelines direct agencies to:

- Develop and implement their agency-specific information quality guidelines by October 1, 2002;
- Adopt a basic standard of quality as a performance goal and incorporate the standard into the agency’s operations;
- Develop a process for reviewing the quality of information before it is disseminated; and
- Establish a process for affected persons to request correction of information that may not comply with OMB’s or the agency’s guidelines.

Information Quality Guidelines are important to the Department of Education because the Department provides a wide variety of education information to the public, including information about the condition of American education and about Department programs. The Department’s information products are widely available and broadly accessible, and are used extensively by educators, researchers, policymakers, and the public. Most of the information products are available both as printed and electronic documents. They are announced on the Department’s website ([www.ed.gov](http://www.ed.gov)), and most electronic versions can be accessed and downloaded directly from the website.

Information products describe the Department’s policies, programs, and services; also included are profiles of the learner populations served by Department programs, evaluations of Department programs, and research products describing ‘What Works’ in American education. In addition, the Department reports statistical data describing the educational achievement, attainment, and the demographic and socioeconomic characteristics of America’s students; the characteristics of the education labor force in the United States; the financing of education in the United States; and international comparisons of education systems and their students.

The purpose of these guidelines is to describe the Department’s policy and procedures for reviewing and substantiating the quality of information before the Department disseminates it, and to describe the Department’s administrative mechanisms allowing affected persons to seek and obtain, where appropriate, correction of information disseminated by the Department that does not comply with the OMB or the Department’s Information Quality Guidelines. These

guidelines are intended only to improve the internal management of the Department and do not create any right or benefit that is substantive or procedural, or that is enforceable at law or equity, by any party against the United States, its agencies, officers, or employees, or any person.

These guidelines do not govern all information of the Department of Education, and also do not cover all information disseminated by the Department. For example, the guidelines generally do not cover:

- Internal information;
- Information collected or developed by the Department that is not disseminated to the public, including documents intended only for inter-agency or intra-agency communications;
- Research findings published by grantees, unless the Department –
  - ❑ Represents or uses the information as the official position of the Department, or in support of the official position of the Department;
  - ❑ Has authority to review and approve the information before release; or
  - ❑ Directs that the information be disseminated.
- Opinions;
- Electronic links to information on other websites;
- Correspondence with individuals;
- Responses to requests for information under the Freedom of Information Act, the Federal Advisory Committee Act, and the Privacy Act;
- Press releases; and
- Archival records, public filings, subpoenas, or adjudicative processes.

For information covered by these Department Information Quality Guidelines, the guidelines provide for a basic standard of quality that is built around three elements of quality as defined by OMB: utility, objectivity, and integrity. These elements are intended to ensure that information disseminated by the Department is useful, accurate, reliable, unbiased, and secure. The guidelines include a discussion of the level of effort appropriate to specific types of information.

In addition to the Department's general Information Quality Guidelines, the Department supports the development of more detailed guidelines that are tailored to specific information needs. An example of a program-specific guideline is the National Center for Education Statistics' (NCES) Statistical Standards, which may be accessed at the following url: <http://nces.ed.gov/statprog/>

## Information Quality

### Utility

*Utility refers to the usefulness of the information to its intended users. The usefulness of information disseminated by the Department of Education should be considered from the perspective of the Department, educators, education researchers, policymakers, and the public. Utility is achieved by staying informed of information needs and developing new products and services where appropriate.*

The Department of Education relies upon internal reviews and analyses, along with feedback from advisory committees, educators, education researchers, policymakers, and the public to ensure that information disseminated about the Department's programs, relevant laws and regulations, policies, products and services meets the needs of intended users. Information disseminated by the Department that is intended to be useful for educators, education researchers, policymakers, and the public includes program information, administrative data, and research and statistical information.

### ***Program Information***

Information about education programs includes descriptions of the Department's programs and services and, where applicable, who is eligible and how and where to apply for services or assistance. It also may include information pertaining to evaluations of specific programs and services.

### ***Administrative Data***

Administrative data includes records from schools, school districts, and states that are used for program monitoring. These data must be carefully described and documented in reports and products released by the Department.

### ***Research and Statistical Information***

The Department uses census and survey data collections to fill the information needs for statistical data and research information. The Department supports both ongoing data collections and special purpose surveys, research studies, and program evaluations that are designed to fill data gaps or information needs that are identified through internal review, legislative mandates, or input from data users outside the Department. All research and statistical reports and related products are reviewed to ensure their usefulness to the intended users. Where appropriate, contact information is available on each publication to facilitate feedback and questions by users.

## **Objectivity**

*Objectivity refers to whether information is accurate, reliable, and unbiased, and is presented in an accurate, clear, and unbiased manner. It involves both the content of the information and the presentation of the information. This includes complete, accurate, and easily understood documentation of the source of the information, with a description of the sources of any errors that may affect the quality of the data, when appropriate. Objectivity is achieved by using reliable information sources and appropriate techniques to prepare information products.*

All information products must be reviewed for objectivity before dissemination to the public. In addition, scientifically rigorous methods are an essential prerequisite for objective research, administrative, and statistical information.

The Department of Education has identified a number of elements that help ensure objective research and data:

1. In formulating a research plan or a data collection plan, goals of the study must be clearly described.
2. The subjects to be studied and the data to be collected must be clearly defined, using broadly understood concepts and definitions.
3. The research study approach or data collection techniques must be well thought out, clearly articulated, and designed to use state of the art methodologies in the study or data collection, or both.
4. In designing the work, every effort must be made to minimize the amount of time required for study participants.
5. The source of research information or data must be reliable.
  - a) For research information, the study design can help ensure that the experimental design is appropriate for producing reliable data.
  - b) For sample survey data, the sample must be drawn from a complete list of items to be tested or evaluated, the appropriate respondents must be identified, correctly sampled, and queried with survey instruments that have been properly developed and tested.
  - c) For administrative data, the appropriateness of the data identified for the information need must be considered and the completeness and accuracy of the data must be sufficient.
6. Response rates must be monitored during data collection. When necessary, appropriate steps must be taken to ensure the respondents are a representative sample.
7. Care must be taken to ensure the confidentiality of personally identifiable data, as required by law, during research/data collection, processing, and analysis of the resulting data.
8. Upon completion of the work, the findings and data collection must be processed in a manner sufficient to ensure that the data are cleaned and edited to help ensure that the data are accurate and reliable.
9. The findings and data collection must be properly documented and stored, and the documentation must include an evaluation of the quality of the data with a description of any limitations of the data.
10. Data must be capable of being reproduced or replicated based on information included in the documentation including, for example:
  - a) The source(s) of the information;
  - b) The date the information was current;
  - c) Any known limitations on the information;
  - d) The reason why the information is provided;
  - e) Descriptions of any statistical techniques or mathematical operations applied to source data; and

- f) Identification of other sources of potentially corroborating or conflicting information.
11. If secondary analysis of data is employed, the source must be acknowledged, the reliability of the data must be confirmed and documented, and any shortcomings or explicit errors must be acknowledged (e.g. the representativeness of the data, measurement error, data preparation error, processing error, sampling errors, and nonresponse errors).
  12. The analysis must be selected and implemented to ensure that the data and research information are correctly analyzed using modern statistical techniques suitable for hypothesis testing. Techniques may vary from simple tabulations and descriptive analysis to multivariate analysis of complex interrelationships. Care should be taken to ensure that the techniques are appropriate for the data and the questions under inquiry.
  13. Descriptions of the data and all analytical work must be reported in sufficient detail to ensure that the findings could be reproduced using the same data and methods of analysis; this includes the preservation of the data set used to produce the work.
  14. All reports, data, and documentation must undergo editorial and technical review to ensure accuracy and clarity prior to dissemination. Qualified technical staff and peers outside the Department must do the technical review.
  15. To ensure the utility of the work, all work must be conducted and released in a timely manner.
  16. There must be established procedures to correct any identified errors. These procedures may include the publication of errata sheets, revised publications, or Web postings.

## **Integrity**

*Integrity refers to the security or protection of information from unauthorized access or revision. Integrity ensures that the information is not compromised through corruption or falsification.*

The Department of Education has in place appropriate security provisions for the protection of confidential information that is contained in all identified systems of records. In accordance with statutory and administrative provisions governing the protection of information, the Department protects administrative records and sample survey data that include personally identifiable information, especially survey data that are collected under a pledge of confidentiality.

Applicable provisions governing the protection of information include the following:

- Privacy Act;
- Computer Security Act of 1987;
- Freedom of Information Act;
- OMB Circulars A-123, A-127, and A-130;
- Federal Policy for the Protection of Human Subjects;
- Government Information Security Reform Act; and
- National Education Statistics Act, as amended by the USA Patriot Act.

## **Influential Information**

The OMB guidelines for implementing section 515 recognize that some government information may need to meet higher quality standards than a basic standard of quality. The level of effort required to ensure the quality of information is tied to the uses of the information. Information that is defined as “influential” requires a higher level of effort to ensure its’ quality and reproducibility. Scientific, financial, and statistical information is considered influential if the Department can reasonably determine that the information will have a clear and substantial impact on important public policies or private sector decisions if disseminated. Influential information must be accompanied by supporting documentation that allows an external user to clearly understand and be able to reproduce the steps involved in producing the information. Individual programs within the Department of Education may designate certain classes of scientific, financial, and statistical information as “influential.”

## **Information Correction Requests and Appeals**

*Note: These draft guidelines should not be used to request the correction of information. Final guidelines will be posted after September 30, 2002 describing the procedures for requesting correction of information.*

The Department of Education has developed a procedure, described below, for any affected person to request the correction of information disseminated by the Department that does not comply with applicable information quality guidelines. An “affected person” is an individual or an entity that may benefit or be harmed by the disseminated information at issue.

Most Department information products include the names of knowledgeable staff that can assist users in understanding the information presented, and in determining whether there is an error that warrants action using the correction process described in this section. Users of the Department’s information should consult with the contact person listed in the product before filing a formal request for correction.

### ***Information Correction Requests***

An affected person who believes that information disseminated by the Department does not adhere to the information quality guidelines of OMB or the Department, or an office of the Department that has issued program-specific guidelines, and who would like to request correction of specific information, should provide the following information:

- Information identifying the requestor (name, mailing address, telephone number, and organizational affiliation, if any);
- A detailed description of the information that the requestor believes does not comply with the Department’s or OMB’s guidelines, including the exact name of the data collection or report, the disseminating office and author, if known, and a description of the specific item in question;

- Potential impacts on the requestor from the information identified for correction (i.e., describe the requestor’s interest in the information and how the requestor would benefit or be harmed by the information in question); and
- An explanation of the reason(s) that the information should be corrected (i.e., describe clearly and specifically the elements of the information quality guidelines that were not followed).

This information should be provided to the Deputy Chief Information Officer for Information Management at the following address:

Deputy Chief Information Officer  
for Information Management  
Office of the Chief Information Officer  
U.S. Department of Education  
RE: Section 515 Information Quality Request  
Room 4060, ROB-3  
400 Maryland Avenue, SW  
Washington, DC 20202

Alternatively, requesters may submit e-mail requests to the following address: “ocio.section515request@ed.gov.” Please be sure to indicate that you are submitting a “Section 515 Information Quality Request” in the subject line of the e-mail.

### ***Review***

The Deputy Chief Information Officer for Information Management (DCIO/IM) will review the request, and determine whether the request constitutes a clear and complete request for correction within the criteria for such requests described in these information quality guidelines.

If the request is clear and complete, the DCIO/IM will forward the request to the appropriate program office(s) for response. If the request is unclear or incomplete, the Department will seek clarification from the requester. However, whether the request is clear and complete or not, the Department may elect not to process the request or may limit the nature and extent of its review or correction where there are no affected persons or where the request is deemed to be inconsequential, without justification, or made in bad faith.

### ***Response***

The Department will respond to all requests for correction within 60 days of the DCIO/IM’s receipt of the request, including requests that the Department elects not to process further. For requests that appear to merit review --

- If the request is clear and complete, the Department’s response will explain the findings of the review, or will inform the requestor if more time is needed to complete the review, and the reason(s) for the additional time. The appropriate program office will be responsible for determining what action is necessary and, if an error was made, it will determine the appropriate level of correction.

- If the request is incomplete or unclear, the Department will seek further clarification from the requestor. In the case of an unclear or incomplete request, the requestor may submit additional clarifying information if he/she so chooses. However, the deadline for the Department's response will be based upon the date the clarifying information is received.

A copy of all Department correspondence related to Section 515 Information Quality Requests will be provided to DCIO/IM, who will be responsible for maintaining such information.

### *Appeals*

If a requestor is not satisfied with the Department's response to the request, he/she may submit an appeal to the Department's Chief Information Officer within thirty (30) days of receipt of the initial response(s). This administrative appeal must include a copy of the initial request, a copy of the initial Department response(s), and a letter providing specific arguments and rationale as to why the requestor believes the Department's response was inadequate, incomplete, or in error.

This appeal information should be provided to the Department's Chief Information Officer (OCIO) at the following address:

The Chief Information Officer  
U.S. Department of Education  
RE: Section 515 Information Quality Appeal  
Room 4082, ROB-3  
400 Maryland Avenue, SW  
Washington, DC 20202

Alternatively, requestors may submit an appeal by e-mail to the following address:  
"ocio.section515appeal@ed.gov."

Please be sure to indicate that you are submitting a "Section 515 Information Quality Appeal" in the subject line of the e-mail. Such e-mail requests must include all of the information specified for an appeal submitted by regular mail.

The Department will respond to all appeals within 60 days of the CIO's receipt of the request, or will inform the requestor if more time is needed to complete the review of the appeal, and the reason(s) for the additional time.