



DIRECTOR'S ORDER #11B: Ensuring Quality of Information Disseminated by the National Park Service

Approved: /s/ Fran P. Mainella, Director

Effective Date: 10/16/02

Sunset Date: 10/16/06

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I. BACKGROUND AND PURPOSE

In Section 515(a) of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; HR 5658), Congress 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 guidelines require also that administrative mechanisms be established to allow affected persons to seek and obtain correction of information maintained and disseminated by the agency when that information does not comply with guidelines issued by the Office of Management and Budget. The purpose of this Director's Order is to establish National Park Service (NPS) guidelines to comply with these requirements.

A notice published by the Office of Management and Budget (OMB) in the Federal Register, issued February 22, 2002, Vol. 67, No. 36, page 8452, directed Federal agencies to issue and implement guidelines to ensure and maximize the quality, objectivity, utility and integrity of Government information disseminated to the public. The NPS is issuing these guidelines in order to comply with this direction. This document is the basis for the NPS's policy.

The NPS disseminates a wide variety of information to the public regarding the national parks, natural and cultural resources, geographic and spatial data, and commemorative events. Such information takes the form of brochures, research and statistical reports, policy and regulatory information, and general reference information. All offices should evaluate and identify the types of information disseminated that will be subject to these guidelines.

II. AUTHORITY TO ISSUE THIS DIRECTOR'S ORDER

The authority to issue this Director's Order is contained in the 1916 NPS Organic Act (16 U.S.C.1 through 4), delegations of authority contained in Part 245 of the Department of the Interior Manual, and the Department of the Interior's information quality guidelines.

III. INFORMATION QUALITY STANDARDS

The National Park Service disseminates organizational information, natural and cultural resource information, and budget information. Organizational information includes general descriptive information about the NPS and its component parks and offices. Examples include the parks' history, functions, and legislative authorities; organizational charts, the offices within the parks and their functions; the parks' strategic and performance plans and their budgetary information; and information pertaining to the parks' history, natural and cultural resources and administrative processes. All information disseminated by the NPS must comply with basic standards of quality to ensure and maximize the objectivity, utility, and integrity of information disseminated to the public.

A. Reliable Data. The National Park Service will ensure that information it releases will be developed from reliable data sources and will otherwise ensure information quality at each stage of information development. The NPS's methods for producing quality information will be made transparent, to the maximum extent practicable, through accurate documentation, use of appropriate internal and external review procedures, consultation with experts and users, and verification of the quality of the information disseminated to the public. The NPS will also keep users informed about corrections and revisions.

Information will be developed only from reliable data sources based on accepted practices and policies utilizing accepted methods for information collection and verification. It will be reproducible to the extent possible. Influential information will be produced with a high degree of transparency about data and methods. The information should include all pertinent information to allow the public to understand the park's legislative authorities, mission, activities, organization, strategic plan, performance plan, and performance accomplishments.

B. Accuracy and Timeliness. All information will be accurate, timely, and reflect the most current information available. All information sources will be documented. Where appropriate, it will provide users with additional documentation or with method(s) to access supporting documentation by reference (e.g., citations) or by electronic means (e.g., "links").

C. Compliance with Laws, Regulations and Policy. All information will comply with current NPS and Departmental policies and guidelines that govern information dissemination to the public. The information will also comply with the requirements of applicable public laws, such as the Government Performance and Results Act of 1993, and implementing rules, regulations, directives and instructions issued under the authority of such laws. To the maximum extent possible, information will be made available on Service websites for easy access by the public.

In addition to these standards, the information quality standards as described by OMB's final guidelines and the Department of the Interior's guidelines are incorporated by reference as NPS policy and standards.

D. Third Party Information Under the Guidelines. If NPS relies upon technical, scientific, or economic information submitted or developed by a third party, that information is subject to the appropriate standards of objectivity and utility. These standards of these guidelines apply not only to information that NPS generates, but also to information that other parties provide to NPS, if NPS disseminates or relies upon this information.

E. Paperwork Reduction Act. NPS's components will make use of OMB's Paperwork Reduction Act (PRA) clearance process to help improve the quality of information that NPS collects and disseminates to the public. All proposed collections of information that are disseminated to the public should demonstrate in their PRA clearance submissions to OMB that the proposed collection of information will result in information that will be collected, maintained, and used in a way consistent with the DOI and OMB Quality Information guidelines.

IV. POLICIES AND INSTRUCTIONS

A. Information Approval. All information disseminated to the public must be approved by the appropriate program and/or regional office prior to its dissemination and must satisfy OMB and Departmental guidelines. The approval process will include documentation of the specific information quality standards used in producing the information in a way to substantiate the quality, utility, objectivity, and integrity of the information in a manner that conforms to OMB and Departmental guidelines.

B. Documentation. Offices may issue documentation for standard types of information that they disseminate and reference these in subsequent approvals. These standards must be approved by the originating office and the documentation retained by the office as long as the standard is active.

C. Complaints About Information Quality. Affected persons may avail themselves of four methods for notifying the NPS of complaints:

1. Informally discuss their complaint in person with park or program office staff, providing information in the form of written documents or oral presentations.
2. Informally direct complaints about the quality of disseminated information to the superintendent of the park or manager of the program office responsible for disseminating the information.
3. Formally direct complaints about the quality of disseminated information by mail to the NPS Washington Administrative Program Center, 1849 C. Street, N.W. Stop 2605, attention: Correspondence Control Unit (CCU). The complainant should use the subject: "Complaint About Information Quality" so that it may be clearly recognizable to those managing the process.
4. Formally e-mail complaints about the quality of disseminated information to Director@nps.gov. The complainant should use the subject: "Complaint About Information Quality" so that it may be clearly recognizable to those managing the process.

A request for formal informational correction must include the following:

1. A written statement that the person is seeking correction of information disseminated by the National Park Service and the specific reasons for believing the information fails to meet OMB or DOI standards, along with supporting documentation, if any.
2. Name, mailing address, telephone number, email address (if applicable) and organizational affiliation, if any, of the individual making the complaint. Organizations submitting a complaint should identify one individual to serve as the primary contact.
3. A detailed description of the specific material in question, including where the material is located (that is, publication title, date, and publication number, if any, or the website and web page address).
4. A description of how the person submitting the complaint is affected by the informational error.
5. The specific recommendations for corrective action.

D. Processing Complaints. The CCU will route complaints they receive to the park or office that disseminated the information and track response to assure that it complies with the requirements of this Director's Order. The park or office receiving the complaint, regardless of the manner of receipt, will notify the complainant of receipt within 10 working days. The disseminating office will evaluate the complaint within 60 calendar days of the day it is received by the NPS, in accordance with the OMB guidelines, and notify the complainant as to whether the information has been corrected, deleted, or confirmed to be accurate.

A second complaint received before the issuance of a 60 calendar day notice for an overlapping complaint under review will be treated with simultaneous consideration, and the second complainant will be notified within 10 working days that an analysis is in progress and advised of its status. The earlier and later complaints will be combined, and a combined

60 calendar day finding will be issued based on the date of the first complaint.

If the second identical complaint on the same subject is received after a 60 calendar day notice has been issued, then the second complaint will require a new and separate review, however recent. Unless substantial new information has been submitted, the 60 calendar day finding for the earlier complaint shall suffice and should be relatively easy to produce.

E. Comments Associated with Structured Reviews. The NPS conducts a substantial amount of business through processes which involve a structured opportunity for public review and comment on proposed documents prior to their issuance in final form. These activities include rulemakings and analyses conducted under the National Environmental Policy Act (NEPA). In these instances, requests made under these guidelines for corrections of information in draft documents will generally be treated as a comment on the draft document and the response will be included in the final document.

In the case of rulemaking and other public comment procedures where the NPS disseminates a study analysis or other information prior to the final agency action or information product, requests for correction will be considered prior to the final agency action or information dissemination in those cases where the agency has determined that an early response would not unduly delay issuance of the agency action or information, and the complainant has shown a reasonable likelihood of suffering actual harm from the agency's dissemination if the agency does not resolve the complain prior to the final agency action or information product.

In cases where a request pertains to a final document, the NPS will first determine whether the request pertains to an issue discussed in the draft document upon which the requester could have commented. If the NPS determines that the requester had the opportunity to comment on the issue at the draft stage and failed to do so, it may consider the request to have no merit. If information which did not appear in the draft document is the subject of a request for correction, the NPS will consider that request. If the NPS determines that the information does not comply with the guidelines issued by the Department or OMB, such that the non-compliance with the Department or OMB guidelines presents significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts, the NPS will use existing mechanisms to remedy the situation, such as re-proposing a rule or supplementing a NEPA analysis.

F. Exemptions. Information specifically not subject to these guidelines includes:

1. **Press Releases** - These guidelines do not apply to press releases, fact sheets, press conferences or similar communications in any medium that announce, support the announcement, or give public notice of information NPS has disseminated elsewhere.
2. **Public Filings** - Information in public filings (such as public comments received by NPS in rulemaking proceedings), except where NPS distributes information submitted by a third party in a manner that suggests that NPS endorses or adopts the information, or indicates in its distribution that it is using or proposing to use the information to formulate or support a regulation, guidance, or other NPS decision or position.
3. **Exclusion for Agency Employed Scientist, Grantee, or Contractor** - Dissemination of information by an agency-employed scientist, grantee, or contractor is not subject to the guidelines, namely those situations in which they publish and communicate their research findings in the same manner as their academic colleagues, therefore not implying official agency endorsement of their views or findings.
4. **Testimony and Other Submissions to Congress** - Information presented or submitted to Congress which is simultaneously disseminated or previously disseminated to the public is exempt from these Data Quality Guidelines.
5. **Inadvertent or Unauthorized Disclosure of Information intended Only for Inter-agency and Intra-agency Use or Communication** - Documents in working form which are generated in day-to-day internal conduct of NPS and other Government

- business are exempt from these Guidelines.
6. **Correspondence with Individuals** - An exchange of information between two individuals is not considered to be a dissemination.
 7. **Records Covered by Other Laws** - Responses to requests for NPS records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or similar laws are not included in these Guidelines.
 8. **Archived Records and Information Disseminated Prior to October 1, 2002** - Archived records of information disseminated and subsequently archived are exempt from the Guidelines.

Note: Information disseminated prior to October 1, 2002, but not archived, and which is still being used in a decision making process, is not exempt from these guidelines.

G. Appeals Process. If a complainant does not receive the notice or the response within the time frames described above, or wishes to appeal a determination of merit, or wishes to appeal the proposed correction of information, the complainant may appeal to the Director, National Park Service. If that official determines that an appeal of a determination of merit or the proposed correction of information has merit, the affected program office or park will be notified. The challenged information will be withdrawn, to the extent practicable, from the public domain and will not be used in any Departmental, bureau, or office decision-making process until it is corrected. The Director, National Park Service, will make a decision on the final appeal within 60 calendar days.

H. Further Information. NPS personnel and the public should consult the website at <http://data2.itc.nps.gov/npspolicy/DOrders.cfm> and reference Director's Order 11B.

V. RESPONSIBILITIES

A. The Associate Director, Administration, through the Washington Administrative Program Center, is responsible for management and administration of the program.

B. Associate directors and research contractors are responsible for ensuring that their staffs implement these policies and procedures.

C. Managers are responsible for:

1. Ensuring that the information they release to the public, in any manner, is developed from reliable sources and ensuring information quality at each stage of information development.
2. Documenting the quality of all information that they release to the public, including information on the internet.
3. Notifying complainants of the receipt of their complaint within 10 working days of its receipt in the Correspondence Control Unit.
4. Responding to complaints about information quality within 60 calendar days from receipt of a complainant in CCU.

D. The CCU is responsible for:

1. Routing public complaints they receive about information quality to the information disseminating office.
2. Reminding offices of their deadlines to respond to pending complaints forwarded by the CCU.
3. Generating annual reports to the Department of the Interior of the number, nature, and resolution of complaints received by the CCU.

VI. DEFINITIONS

In complying with this Director's Order, the following definitions apply:

A. Quality - is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these four statutory terms, collectively, as "quality."

B. Utility - refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the NPS disseminates to the public, the office needs to consider the uses of the information not only from the perspective of the office, but also from the perspective of the public. As a result, when transparency of information is relevant for assessing the information's usefulness from the public's perspective, the office must take care to ensure that transparency has been addressed in its review of the information.

C. Objectivity - involves two distinct elements, presentation and substance. "Objectivity" includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within a proper context. In addition, "objectivity" involves a focus on ensuring accurate, reliable, and unbiased information. In a scientific, financial, or statistical context, the original and supporting data shall be generated, and the analytic results shall be developed, using sound statistical and research methods.

D. 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.

E. Information - means any communication or representation of knowledge such as fact or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition includes information that an office 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 office's presentation makes it clear that what is being offered is someone's opinion rather than fact or the office's views.

F. Dissemination - means NPS initiated or sponsored distribution of information to the public. Dissemination does not include distribution limited to government employees or NPS contractors or grantees; intra- or inter-agency use or sharing of government information; and responses to requests for agency 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.

VII. LEGAL EFFECT

These guidelines are intended only to improve the internal management of the National Park Service relating to information quality. Nothing in these guidelines is intended to create any right or benefit, substantive or procedural, enforceable by law or equity by a party against the United States, its agencies, its offices, or any other person. These guidelines do not provide any right to judicial review.

----- *End of Director's Order* -----