



updated September 27, 2002

## FINAL DRAFT BUREAU OF RECLAMATION QUALITY OF INFORMATION GUIDELINES

### I. Introduction

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." OMB's guidelines were published in the Federal Register on February 22, 2002 (67 FR 8452), directing agencies subject to the Paperwork Reduction Act (44 USC 3502) to:

"Issue guidelines ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by their agency, no later than October 1, 2002.

"Establish administrative mechanisms allowing affected persons to seek and obtain correction of information that does not comply with OMB guidelines.

"Report to the Director of OMB the number and nature of complaints received by the agency regarding the accuracy of information and how such complaints were handled by the agency."

This document constitutes the Bureau of Reclamation's response to the directive from OMB. The Reclamation guidelines will apply to all information the bureau disseminates on or after October 1, 2002, regardless of when the information was first disseminated. Information disseminated prior to October 1, 2002, but not archived and still being used in a decision-making process is not exempt from these guidelines. Archived records of information disseminated and subsequently archived are exempt from the guidelines.

### II. Bureau of Reclamation Information Quality Guidelines

#### A. Related Guidelines

Both the OMB and the final Department of the Interior (DOI) guidelines and standards are incorporated by reference into these Reclamation guidelines. The information quality definitions published by OMB and DOI guidelines also are adopted as Reclamation's definitions for information quality.

#### B. Overview of Reclamation Information Quality Guidelines.

Since the Bureau of Reclamation was established in 1902, it has maintained comprehensive internal and external procedures for ensuring the quality, objectivity, utility and integrity of its data, analyses, and scientific conclusions. Most materials that constitute "information" that the Bureau of Reclamation disseminates or makes available to the public will be covered by these guidelines, e.g., information produced by the Bureau of Reclamation in any medium, including data sets, web pages, audiovisual presentations, and published reports, including draft reports made available for public comment. Factors such as imminent threats to public health or homeland security, statutory or court-ordered deadlines, or other circumstances beyond Reclamation's control, may limit or preclude applicability of these guidelines.

**Internal Review.** To the greatest extent practicable and appropriate, information Reclamation disseminates is internally reviewed for quality – including objectivity, utility and integrity – before such information is disseminated. Information disseminated by the Bureau is normally subject to one or more levels of quality review by internal staff or supervisory officers before it is released for dissemination. The number of levels of internal quality review applied in a particular case depends on the nature, scope and purpose of the information to be disseminated. For example, routine reports that may be prepared by staff about the Bureau's activities or operations may be subject to one or two levels of staff or supervisory review for basic accuracy and completeness before such reports are released to the general public. Additional levels of internal review, supplementation, clarification or approval by Bureau management may be appropriate, however, to the extent that such a report may be intended as the basis for more complicated budgeting decisions or legislative reporting purposes.

Each Bureau of Reclamation office will incorporate the information quality principles outlined in these guidelines into its existing pre-dissemination review procedures as appropriate. Offices and regions may develop unique and new procedures as needed to provide additional assurance that the information disseminated by or on behalf of them is consistent with these guidelines.

**Paperwork Reduction Act.** All Reclamation offices will make use of OMB's Paperwork Reduction Act (PRA) clearance process to help improve the quality of information that the bureau 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.

**Exemptions.** Exemptions to these guidelines include materials intended to be limited to subpoenas or adjudicative processes; information in public filings submitted by Reclamation to other organizations or government agencies, such as public comments submitted in a rulemaking or NEPA document, unless relied upon by Reclamation; internal distributions to employees; information covered by the Privacy Act, the Federal Advisory Committee Act or similar laws; normal and usual correspondence; press releases, fact sheets, press conferences or similar communications; Congressional testimony and information provided to Congressional offices; outdated or superceded Reclamation information.

**Third Party Information.** If Reclamation 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. The standards of these guidelines apply not only to information that Reclamation generates, but also to information that other parties provide to Reclamation, if Reclamation disseminates and relies upon this information.

### **C. Reclamation Influential Information**

"Influential information" means that Reclamation can reasonably determine that dissemination of the information could have a clear and substantial impact on important public policy or management decisions of others. Reclamation recognizes that the information it disseminates includes data or information that can influence policy decisions. All Reclamation information should meet a very high standard of quality.

Reclamation scientific information is subject to a high degree of transparency about data and methods to facilitate the reproducibility of such information by other qualified scientists. This information has a high degree of transparency regarding (1) the source of the data used, (2) the various assumptions employed, (3) the methods applied, and (4) the statistical procedures employed. The degree of rigor with which each of these factors is presented and discussed is scaled as appropriate. If access to data and methods cannot occur due to compelling interests such as privacy, trade secrets, intellectual property and other confidentiality protections, Reclamation will, to the extent practicable, verify information and document that verification steps were taken.

## **III. Information Correction**

### **A. Administrative Process**

The Web Manager maintains records on each inquiry. Beginning in 2003, the Bureau of Reclamation will send an annual report to the Department of the Interior by November 30 describing the number, nature and

resolution of any correction inquiries received during the fiscal year.

Correction requests should be made by contacting the Reclamation Web Manager by the following means:

Email: [InfoQuality@usbr.gov](mailto:InfoQuality@usbr.gov)

Fax: 202-513-0305

U.S. Mail: Bureau of Reclamation  
Office of Public Affairs  
1849 C Street, N. W. (MS 7060)  
Washington, D.C. 20240

## **B. Requirements**

A request for information correction must include the following:

- A written statement that the person is seeking correction of information disseminated by the Bureau of Reclamation and the specific reasons for believing the information fails to meet OMB or DOI, or Bureau of Reclamation standards, along with supporting documentation, if any.
- 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.
- The complainant should use the subject line, "Complaint About Information Quality," so that it may be clearly recognizable to those managing the process.
- 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).
- A description of how the person submitting the complaint is affected by the information error. The specific recommendations for corrective action.

## **C. Evaluation**

The Reclamation Web Manager will notify the complainant of receipt of their inquiry within 10 business days of receipt. Reclamation will first determine the applicability of the correction definitions and guidelines, and if the information is deemed to be exempt from the guidelines, will so notify the complainant. If the inquiry is covered by the guidelines, then the Web Manager will forward the correction request to the appropriate office for evaluation and resolution.

Within 60 calendar days of receipt, the appropriate office will evaluate the information in question. If Reclamation determines that the correction request is without merit, the complainant will be notified. If Reclamation determines that the request has merit, then Reclamation will take reasonable steps to respond to the complainant's request and will notify the complainant of this intent and the corrective steps proposed. Reclamation will determine the schedule and procedure for correcting any challenged information that it has deemed as having an error. Reclamation will not disseminate any information it has determined is in error until such error has been corrected. If the request requires more than 60 calendar days to resolve, the agency will inform the complainant that more time is required and indicate the reason why.

A second complaint received before the issuance of a 60-calendar-day evaluation notice for an overlapping complaint under review will be treated with simultaneous consideration, and the second complainant will be notified within 10 business days that an analysis is in progress and advised of its status. The first and any subsequent complaints will be combined and a combined 60-calendar-day finding will be issued.

If a second identical complaint on the same subject is received any time after a 45-business-day notice has been issued, then the second complaint will require a new and separate review. Unless substantial new information has been submitted, the 60-calendar-day finding for the earlier request shall suffice.

## **D. Appeal Procedure**

If complainants are dissatisfied with a decision regarding their request, they may appeal the decision to the

Commissioner, Bureau of Reclamation, using the address of the Web Manager.

Appeals for reconsideration should contain the following:

- An indication that the person is seeking an appeal of a Reclamation decision on a previously submitted request for a correction of information, including the date of the original submission and date of Reclamation decision.
- Name, mailing address, telephone number, email address (if applicable), and organizational affiliation, if any, of the individual making the complaint appeal. Organizations submitting an appeal should identify one individual, as the primary contact.
- An explanation of why the appealing person or organization disagrees with the Reclamation decision as inconsistent with OMB or DOI standards, and if possible, a recommendation of corrective action.
- A copy of the original request for the correction of information.

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

#### **IV. Legal Effect**

These guidelines are intended only to improve the internal management of the Bureau of Reclamation 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.

Contact [Pagemaster](#)