



DEPARTMENT OF THE TREASURY DEPARTMENTAL OFFICES PROCEDURES FOR IMPLEMENTATION OF THE INFORMATION QUALITY LAW SUBCHAPTER 14A OF THE TREASURY IT MANUAL

Introduction: Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 [Public Law 106-554] requires Federal Agencies to issue guidelines ensuring and maximizing the quality, utility, objectivity, and integrity of disseminated information. This document serves as the Departmental Offices (DO) "Procedures for Implementation of the Information Quality Law."

Mission: DO is primarily responsible for policy formulation and overall management of the Treasury Department.

Purpose: In response to the OMB and Treasury guidelines, this document describes the procedures DO will employ to ensure the quality of its information products, including the utility, objectivity, integrity, transparency, and reproducibility. These DO procedures are based on, and **must be used in conjunction with, both Treasury and OMB guidelines** (Chapter 14 of the Treasury Information Technology Manual and OMB guidelines published in the Federal Register on September 28, 2001, January 2, 2002, and February 22, 2002).

Scope: In accordance with OMB guidance this will become effective on October 1, 2002. These procedures will cover information disseminated on or after October 1, 2002, regardless of when the information was first disseminated.

The guidelines apply to information disseminated to the public in any medium including textual, graphic, narrative, numerical, or audiovisual forms. The guidelines apply to information that agencies post on the Internet. The guidelines also apply to Bureau or Departmental Offices sponsored distribution of information - where the agency directs a third party to distribute information or the agency has the authority to review and approve the information before release.

The guidelines do not override other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections. The guidelines do not apply to Hyperlinks to information that others disseminate. The guidelines do not apply to opinions where the agency's presentation makes it clear that the material is an opinion or the agency's views rather than fact. In addition, the guidelines do not apply to information disseminated in the following contexts:

- Dissemination of information limited to government employees or agency contractors or grantees.
- Intra- or inter-agency use or sharing of government information.
- Correspondence with individual persons, press releases, archival records, public filings, subpoenas or adjudicative processes.
- Response to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar laws.

High quality data must be a performance goal for all DO information that is disseminated. Responsibility for assurance of information quality resides with the organization that produces the data. Below are the guidelines that organizations within DO will use to ensure quality data is disseminated.

UTILITY

Utility involves the usefulness and availability of the information to its intended audience. To produce useful, policy-relevant information, offices must stay informed of information needs and develop new data, models, and information products where appropriate. Offices will keep informed of information needs through active and ongoing contact with the community.

DO's analytical and statistical publications and other information products will be reviewed by the responsible organization within DO to ensure that they remain relevant and timely and that they address current information needs. On the basis of internal product reviews and consultation with users, and in response to changing needs and emphases, the content of ongoing information products is changed, new products are introduced, and some products are discontinued.

DO's information dissemination process will make information products widely available and broadly accessible. Most reports and other data products are available both as printed and electronic documents.

OBJECTIVITY

Objectivity involves a focus on ensuring that information is accurate, reliable, and unbiased and that information products are presented in a clear, complete, and well-documented manner. Objectivity is achieved by using reliable data sources and sound analytical techniques, by having information products prepared by qualified people using proven methods, and by carefully reviewing the content of all information products.

Use of reliable data sources

Information products disseminated by DO will be based on reliable, accurate data that have been validated. All data employed in the preparation of information products will be compiled using statistically sound procedures implemented by qualified professional staff. When analysis requires using samples from administrative data files, DO employs statistically acceptable methods to design and select the samples. Data samples are designed and compiled by staff knowledgeable about the content, structure, and limitations of the administrative data files employed. In addition, those staff members maintain working relations with agency personnel who create, update, and maintain those files to ensure that their understanding of files is current and complete. When information products require administrative files linked to external data sources, DO employs sound procedures for extracting and linking data from external sources based on a thorough understanding of the relevant components of the data sources.

Preparation of statistical estimates

All estimation and sampling procedures will be prepared using statistically sound procedures designed by qualified professional staff. Samples are evaluated to ensure that the samples are representative. Specialists compare estimates with comparable information from prior years and from other sources to ensure reasonableness and reliability. Computer programs for sampling from files and using data from external data files are reviewed and tested by technical staff. Data files incorporating external data sources are reviewed to ensure that extraction and linkage processes have been implemented correctly.

Data sources, sampling errors, and disclosure limitation methods will be documented in publications, either for the publication as a whole or for individual tables. Documentation in DO publications contains information on data sources including definitions and specifications of variables. Report documentation also includes, where appropriate, information on sampling errors and a description of rules or techniques for avoiding disclosure of confidential information.

Preparation of simulation models

When DO uses simulation models to estimate the effect policy and legislation have on government revenue the models are based on DO's best judgments of current and future behavioral relationships and methods of projecting key program outcomes. For all simulation models, implementation procedures will be tested, and the models' performance will be thoroughly evaluated. All simulation models will be extensively tested and reviewed within DO to verify that the computer programs that were developed to implement models conform to the stated objectives. Where appropriate, historical simulations will be developed to evaluate the success of a model in producing reasonable projections. Models will be periodically updated to reflect input from internal and external reviews and research findings on behavioral relationships.

Preparation of analytical reports and policy studies

Analytical reports will be prepared by subject specialists who use sound statistical and analytic methods and are knowledgeable about the data sources and models being used. Staff, using a variety of analytical techniques ranging from simple tabulations

and descriptive summary statistics to multivariate statistical methods and econometric models, prepares reports. Staff preparing analytical reports and policy studies will be expert in their use of relevant data files, external data sources, and projections from simulation models.

Analytical techniques will be reviewed to ensure that they are appropriate for the data and the analysis to which they are applied, and they will be documented. Qualified staff will review all analytical reports and policy studies to ensure that the analysis is valid, complete, unbiased, objective, and relevant. When analyses are based on projections from simulation models, the assumptions used to produce the projections will be identified as well as the rationale for the assumptions used and the impact of using alternative assumptions.

Editorial review for accuracy and clarity of information in publications

All information products will be edited and proofread before release to ensure clarity and coherence of the final report. Text will be edited to ensure that the report is easy to read and grammatically correct thoughts and arguments flow logically, and information is worded concisely and lucidly. Tables and charts will be edited to ensure that they clearly and accurately illustrate and support points made in the text and include concise but descriptive titles. Tables and charts indicate the unit of measure and the universe being examined, and all internal labels (column headings, row stubs, and panel headings) will accurately describe the information they contain. All changes made to a manuscript during the editing process will be checked by a proofreader and reviewed and approved by the author.

INTEGRITY

Integrity, as used in the OMB quality guidelines, refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. To ensure the integrity of its information, DO will employ rigorous controls that have been identified as representing sound security practices. DO has in place programs and policies for securing its resources as required by the government information security laws. Those security procedures address all major components of information security and apply to all DO operating components. In addition, DO is subject to statutory requirements to protect the sensitive information it gathers and maintains on individuals. Those requirements are contained in the following documents:

- Privacy Act of 1974
- Computer Security Act of 1987
- Office of Management and Budget (OMB) Circulars A-123, A-127, and A-130
- Government Information Security Reform Act

TRANSPARENT AND REPRODUCIBLE

The guidelines focus on reports, studies, and summaries prepared for public dissemination and used in formulating broad program policy. For the purpose of these guidelines, transparency refers to a clear description of the methods, data sources, assumptions, outcomes, and related information that will allow a data user to understand how an information product was designed and produced. Reproducibility of information refers to the ability, in principle, for a qualified individual to use the documentation of methods, assumptions, and data sources to achieve comparable findings. In practice, opportunities for direct reproducibility are often limited by restrictions on access to confidential information.

DO will make the information it disseminates and the methods used to produce this information as transparent as possible so that it can, in principle, be reproducible by qualified individuals. Treasury guidelines call for clear documentation of data and methods used in producing estimates and projections. Some statistical publications are based on publicly available data, and the computer programs that produce the statistics can be made available on request; accordingly, information in those publications is fully reproducible by the public. In addition, some estimates and projections included in DO information products are not directly reproducible. Others may not be directly reproducible because of the complexity and detail of the methods and data. In those cases, greater emphasis is placed on periodic review and on documentation of methods, assumptions, data sources and related information. Information products that are deemed to have a greater impact on public policies are subject to more extensive internal review.

PROCEDURE TO SEEK CORRECTION OF INFORMATION UNDER SECTION 515**Background**

In accordance with Section 515 of Public Law 106-554, codified at 44 U.S.C. § 3516, note, the Treasury Departmental Offices has developed a procedure to allow affected persons to seek and obtain correction of information DO maintains and disseminates. Overall, OMB does not envision administrative mechanism that would burden agencies with frivolous claims. Instead, the correction process would serve to address the genuine and valid needs of Treasury and its constituents without disrupting bureau processes. In making determinations of whether or not to correct information Departmental Offices may reject claims made in bad faith or without justification. DO is required to undertake only the degree of correction that they conclude is appropriate for the nature and timeliness of the information involved and explain such practices in the annual fiscal year report to Treasury. Request for correction of information must be submitted within a reasonable time from the initial data dissemination. This may vary according to the frequency by which the data are disseminated and will be determined by DO officials.

To seek a correction of information under Section 515 parties must:

- State that the request for correction of information is submitted under Section 515 of Public Law 106-554.
- Include name, mailing address, telephone number and organizational affiliation, if any. (Optional - fax number and email address). We need this information to respond to the request and contact parties, if required.
- Clearly describe the information you believe is in error and want corrected. Include the name of the report or data product where the information is located, the date of issuance, and a detailed description of the information to be corrected.
- State how the data affected you and how correction would benefit you.
- State specifically why the information should be corrected and, if possible, recommend specifically how it should be corrected. Provide supporting documentary evidence, such as comparable data or research results on the same topic, to help in the review of your request.

Based on a review of the information provided, DO will:

- Determine whether a correction is warranted, and, if so, what action to take. The nature, influence, and timeliness of the information involved, the significance of the correction on the use of the information, and the magnitude of the correction will determine the level of review and any corrective action.
- Respond by letter, e-mail, or fax. The response will explain the findings of the review, and the actions Treasury will take.
- Respond to request for correction of information within sixty calendar days of receipt. If the request requires more than sixty calendar days to resolve, you will be notified that more time is required, state the reason why, and include an estimated decision date.

Right to appeal decision If the request for correction of data is denied, parties will be informed of their rights to an administrative appeal and told how to apply for it.

Appeals must be submitted to DO within 45 calendar days of receipt of the denial letter. DO will respond to request for correction of information within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, you will be notified that more time is required, state the reason why, and include an estimated decision date.

An official independent of the initial response will render final judgement of the appeal.

How to submit request Request for correction, and request for appeal, of information under Section 515 must be in writing and sent to DO by mail or e-mail at the following address:

Mail:
Department of the Treasury
Chief Information Office

Information Quality Program/ITPS
1500 Pennsylvania Avenue
Washington, DC 20020

Email: PRAsubmission@do.treas.gov

Privacy Act Statement We are authorized to collect the information you provide under section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law No. 106-554 codified at 44 U.S.C. § 3516). It is needed to process your request and allow us to reply accordingly. You do not have to furnish the information, but failure to do so may prevent your request from being processed. The information you furnish is rarely used for any purpose other than to process and respond to your request. However, we may disclose information you give us (e.g., to Congressional Office, or Department of Justice) if authorized or required by Federal law, such as the Privacy Act.

Reporting requirements: The CIO program office will maintain records on complaints beginning October 1, 2002, and retain the statistics necessary for the mandatory annual reports to OMB.