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information quality guidelines



EPA's Implementation of the Information Quality Act

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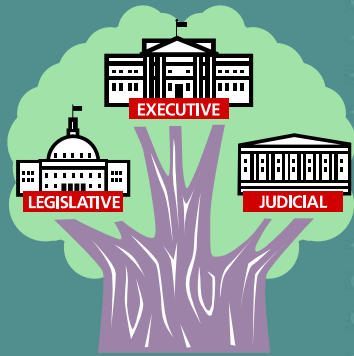


Training Objectives

- Participants will acquire:
 - Information on the origins and intent of the 2001 Data Quality Act/Information Quality Act (DQA/IQA)
 - Understanding of EPA's Implementation of its Information Quality Guidelines (IQGs)
 - Knowledge of tools and processes that facilitate management of the IQGs at EPA
 - Appreciation of the value of the IQGs in enhancing the quality of EPA's information disseminations

Overview

- Origin, Legislative Authority and Guidance
 - Role of the Office of Management & Budget (OMB)
 - Impacts on Federal Agencies
- EPA's Approach to Implementation
 - Agency-wide commitment / OEI's oversight
 - Public participation
 - Key players
 - Quality Staff management
 - "information owners"
 - Office of General
 - OMB
- Responding to requests from "affected" persons
 - Processing initial Requests for Correction (RFC)
 - Processing Requests for Reconsideration (RFR)
- How do we measure success at EPA?



Objective #1

Origin and Authority of the 2001 Data Quality Act

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Legislative Authority

- DQA/IQA
 - Amendment to 2001 Omnibus Appropriations Bill
- Section 515 (a) of the U.S. Treasury and General Government Appropriations Act for FY 2001 (Public Law 106–554; H.R. 5658)
 - requires government-wide standards “for ensuring and maximizing” the quality of information disseminated by Federal agencies





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OMB's Oversight

- Issued “Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies” (67 FR 8452; February 22, 2002)
 - EPA issued its “Guidelines” within deadlines established by OMB (EPA/260R-02-008, October, 2002)
 - The Guidelines are not judicially reviewable

“Quality” - Essence of the OMB’s Guidelines

- Defines “quality” as:
 - “Objectivity” - information that is unbiased, accurate and reliable
 - “Integrity” - information that cannot be compromised, falsified or changed without proper authorization
 - “Utility” - refers to the usefulness of the information to the intended user
- Information must also be transparent and reproducible

“Quality” - Essence of the OMB’s Guidelines, contd..

- The OMB Guidelines endorse a higher degree of quality for “influential scientific, financial or statistical information”
 - For risk assessment information, considered to be influential, OMB referenced SDWA 1996 Amendments as the standard for “quality”

Additional Scope of OMB's Guidelines

- Define disseminated information products
 - Include all paper and electronic materials
- Define information not considered a “dissemination”
 - Someone’s opinion
 - Individual correspondence

Additional Scope of OMB's Guidelines contd..

- Define administrative procedures for responding to requests for correction on disseminated information
 - Request for Correction (RFC)
 - Request for Reconsideration (RFR)
- Require establishing pre-dissemination procedures for information products
- Require annual reporting to OMB on implementation of the IQA



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How Are We Doing?

- This concludes the first training objective
 - Five minutes of open discussion & stretch break
 - Questions and Answers??





EPA's Information Quality Guidelines

Implementation of the DQA/IQA and impacts on the quality of information disseminated at EPA

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How Did EPA Achieve Implementation of the IQA?

- OEI/CIO commitment to information quality
- Cross-Agency Workgroups
- Open comment review process
 - Appendix A contains comments
- Agency commitment to electronically accessible information
 - Public Access via IQG Web site

Managing the IQGs – Three years Later

- Continued OEI Oversight
 - Managed by OEI/Quality Staff
 - Conduct routine training
- Oversight by Office of General Counsel
- “Information owners” are key to success – upper management support is integral
- Routine oversight by OMB

EPA's Information Subject to the IQGs

- Information produced and “disseminated” by EPA to:
 - support or represent EPA’s viewpoint
 - formulate or support a regulation, guidance, or other Agency decision or position

How Does EPA Define “Information?”

- For the purposes of the Guidelines, “information” generally includes any communication or representation of knowledge such as facts or data, in any medium or form
- Also includes preliminary information such as:
 - “draft” products undergoing peer review
 - Information formulating or supporting regulations or guidelines, disseminated via e-DOCKET or Federal Register Notices, etc.

How Does EPA Define “Disseminated” Information?

- For the purposes of the Guidelines, “dissemination” refers to information that support Agency’s decision or position, that EPA distributes or sponsors the distribution of, normally via a Web page
 - Not all Web content is considered “disseminated information”

Methods of Dissemination

- Web sites, libraries, dockets, email, speeches, testimonies, reports to Congress, stakeholder and other public meetings, conference presentations, court filings, federal register notices, hotlines, more....



Information Not Considered a “Dissemination”

- Distribution of information intended only for government employees
 - Intra- or interagency purposes
- Information distributed in response to FOIA, the Privacy Act, or FACA
- Documents filed in judicial cases
- Responses to requests from individuals or groups
- Information that advises the public of an event or activity – “time limited”

“Quality” - Essence of the EPA’s Guidelines

- Embrace information quality as a performance measure
- Adopt SDWA96 higher degree of quality principles for “influential” information
 - “influential” information is defined as information determined to have, or does have, clear and substantial impact on important public policies or private sector decisions
 - Requires high degree of transparency

“Quality” - Essence of the EPA’s Guidelines, contd.

- Examples of “influential” information:
 - Major scientific, technical, economic or social work products subject to EPA Peer Review Policy
 - Tier 1 Rules and Non-rules, including Economically Significant Actions (per E.O.12866)
 - case-by-case determinations

Administrative Processes for Responding to Requests

- Requests for Correction (RFC)
 - Submitted via the EPA Quality mail box, via the mail or faxed
 - “Case manager” on the IQG Team is assigned to facilitate the response process
 - Request is assigned a unique tracking # and posted on the IQG Web site – includes any “related” correspondence and “third party” correspondence
 - Response is reviewed by OGC, AA/OEI, OMB and signed by “information owner” management



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Administrative Processes for Responding, contd..

- Request for Reconsideration
 - Appeal to reconsider the response to the original RFC
 - 90-day submission deadline
 - Provide rationale for the appeal
 - Submit new information if available
- Undergoes similar processing and tracking
 - May assign a more experienced case manager
- Appeals get reviewed by the Agency's CIO, Science Advisor, and Economics Advisor
 - conflict of "ownership" requires a substitution of the panel member





How Are We Doing?

- This concludes the second training objective
 - Fifteen minutes for renewal
 - Questions and Answers??



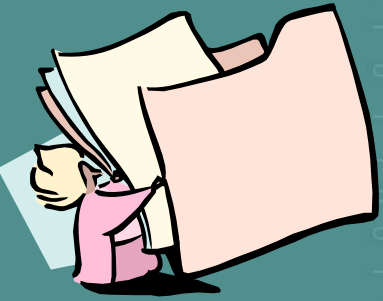


Objective #3

EPA's IQGs

Knowledge of tools and processes that facilitate management of the IQGs at EPA

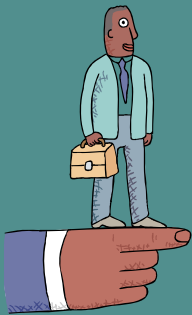
Responding to Users of EPA's Disseminated Information



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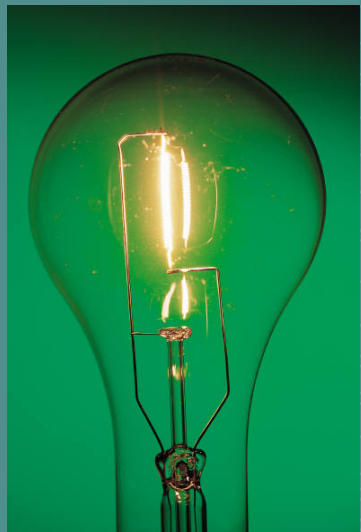


- Scoping - Mapping Out the Road to Success
 - Determining applicability of the request
 - Is it “information” and has it been “disseminated”?
 - Which organization is the “information owner?”
 - Does a parallel process exist?
 - Rule-making, peer review, re-registration, NPL?
 - Is there new information that should be considered?
 - Developing the Response
 - “Information owner” develops response in collaboration with the Quality Staff and OGC
 - Draft response is reviewed by AA/OEI and OMB
 - Response Goal is 90 days
 - Issue interim response if longer time is needed



Are we still Energized?

- Conclusion of objective #3
 - Knowledge of tools and processes that facilitate management of the IQGs at EPA
- On to the final objective



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IQG

Learning Objective #4

- Appreciation of the value of the IQGs in enhancing the quality of EPA's information disseminations

Sources of Requests

- Private citizen
 - 2 RFCs / 1RFR
- Trade/professional organization
 - 22 RFCs / 5 RFRs
- Corporations
 - 4 RFCs / 4RFRs
- Government Agencies
 - 6 RFCs / 1 RFR



Types of Requests Received

- Challenge to rule-making process
 - Private citizen: challenge to Atrazine (RFC 05001)
- Challenge to risk assessment
 - Metam Sodium Alliance: challenge to model used in Human Health Risk Assessment (RFC 05004)
- Challenge to peer review process
 - American Council on Science & Health: Guidelines for carcinogenic risk assessment (RFC 05006)
- Challenge to policy decisions
 - DOW Chemical Company: QA Project Plan (RFC 04021)



Types of Requests, contd..

- Challenge to data contained in EPA's databases used to support a decision or regulation
 - U.S. Chamber of Commerce: challenge to physical/chemical properties (RFR 04019A)
 - American Chemistry Council: challenge to Isopropyl alcohol listing on the Toxics Release Inventory (RFC 0502)

Impacts of IQG Requests - FY03 to FY06

- OAR 7 RFCs / 1 RFR
- OECA 2 RFCs / 1 RFR
- OEI 7 RFCs / 2 RFRs
- OPPTS 6 RFCs / 2 RFRs
- ORD 4 RFCs / 2 RFRs
- OSWER 3 RFCs
- OW 3 RFCs / 2 RFRs
- Region 4 1 RFC
- Region 6 1 RFC /1 RFR



Performance Measures

FY 2003

Received: 13 RFCs
02 RFRs

FY 2004

Received: 12 RFCs
02 RFR
01 "influential"

FY 2005

Received: 07 RFCs
06 RFR

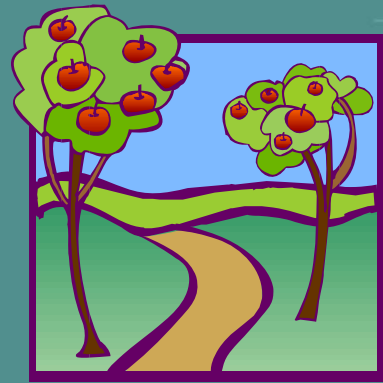
FY 2006

Received: 02 RFCs
01 RFR

Total: 34 RFCs / 11 RFRs

Measuring Success in FY06

- How do we achieve “green” on the scorecard?
 - Process Improvement
 - Time for completing responses
 - Improving internal/external customer service
 - Integrating IQG “quality” principles into the developing EPA Quality Policy Directive
 - Incorporating the IQGs into Quality Management Plans
 - Developing models for pre-dissemination
- At EPA, the IQGs align well with the Agency’s goal for using defensible science supported by quality data and information



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IQG



EPA's Quality System (Order 5360.1 A2)

- Mandatory System
 - Plan
 - Do
 - Check
 - Act
- Data Quality Assessment

IQGs

- Guidance
 - Integrity
 - Objectivity
 - Utility
- Pre-dissemination Review

Similar Goals:

- Quality data
- Defensible decisions
- Transparent processes

What Did I Learn about EPA's Implementation of the IQG?

- EPA has got it under control
- EPA plans for quality in its work products and other disseminations
- EPA supports the principles of the Information Quality Act
- Responsiveness to the customer is key to success
- Continuous improvement is our goal!



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IQG

IQG Officers/Contacts

- OAR David LaRoche
- OCIR Chris Zawlocki
- OECA Joe Acton
- OEI Jeff Worthington
- OGC Mary Grady
- OIG Michael Binder
- OPEI Clay Ogg
- OPPTS Angela Hoffman
- ORD Connie Bosma
- OSWER Kevin Phelps
- OW Thomas Dabolt
- SAB Dan Fort
- Region 1 Gerry Sotolongo
- Region 2 Kevin Kubik
- Region 3 John Graves
- Region 4 Betty Winter
- Region 5 Gilberto Alvarez
- Region 6 Thomas Nelson
- Region 7 John Smith
- Region 8 Tony Medrano
- Region 9 Vance Fong
- Region 10 Dave Tetta



Sources of information

OMB's IQG Web site:

www.whitehouse.gov/omb/infoereg/infopoltech.html

EPA IQG public Web site:

<http://www.epa.gov/quality/informationguidelines>

EPA IQG Intranet Web site:

<http://intranet.epa.gov/quality/informationguidelines>

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