

Information Collection Requests Must Comply with the Data Quality Act

Agency paperwork burden estimates contained in ICR must be accurate and comply with the Data Quality Act ("DQA") as a requirement for their approval by OMB. Specifically, as OMB explained to the President's Management Council,

In this light, we note that each agency is already required to demonstrate the "practical utility" of a proposed collection of information in its PRA submission, i.e., for draft information collections designed to gather information that the agency plans to disseminate. ... It is important that we make use of the PRA clearance process to

help improve the quality of information that agencies collect and disseminate. Thus, OMB will approve only those information collections that are likely to obtain data that will comply with the OMB and agency information quality guidelines."

¹¹ John D. Graham, Memorandum for the President's Management Council, June 10, 2002. [Emphasis added.]