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## B. Administration on Aging

### Draft Guidelines for Ensuring the Quality of Information Disseminated to the Public

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#### I. Agency Mission

The Administration on Aging (AoA) provides leadership, technical assistance, and support the national aging network of 57 State Units on Aging, 655 Area Agencies on Aging, 225 Tribal and native organizations representing 300 American Indian and Alaska Native Tribal organizations and 2 organizations serving Native Hawaiians, plus thousands of service providers, adult care centers, caregivers, and volunteers.

In FY 2002, the AoA received \$1.2 billion in support of its mission. Of that amount, nearly 95.9 percent is allocated by formula to States and Indian Tribes to support community based services to help older Americans maintain their independence. In addition, about 4.1 percent is awarded to States and nonprofit organizations and educational institutions for demonstration and discretionary projects to develop and disseminate improved approaches to programs and services for older Americans. The AoA has approximately 120 employees.

It is AoA policy to make available to the public the results and accomplishments derived from the activities that it funds. Therefore, AoA-funded projects are expected to disseminate the results and accomplishments of their activities available to the aging community and to the public at large.

#### II. Scope and Applicability of Guidelines

##### A. Covered Information

OMB Guidelines apply to the dissemination of substantive information that is endorsed or sponsored by the Agency. This includes:

1. Programmatic Analyses and Evaluations
2. Reports, Monographs, and Technical Assistance Materials, including brochures, documents, newsletters, electronic documents, and audiovisual productions, as well as reports and proceedings from AoA sponsored conferences and meetings
3. Consumer Information
4. Oral information, including speeches, interviews, expert opinions, only if representing AoA's views, official positions, or policies as well as written op-ed and similar editorial materials

## **B. Information Not Covered**

1. CCCS bibliographic information or other archival records
2. Documents not authored by the agency and not representing the agency's views, including information authored and distributed by AoA grantees. Information that is limited in dissemination to Government employees or agency contractors or grantees
3. Information pertaining to basic agency operations, e.g., information about agency authorities, activities, programs, along with contact information for the public, organizational charts, AoA Status Reports, solicitations, program announcements (PAs), receipt and review materials (e.g., summary statements developed in connection with grant reviews)
4. Information intended solely for intra- or interagency use or sharing of Government information
5. Responses to requests for agency records under the Freedom of Information Act (FOIA), the Privacy Act, the Federal Advisory Committee Act, or other similar laws
6. Information relating solely to correspondence with individuals or persons
7. Press releases
8. Information for public filings, subpoenas, or adjudicative processes
9. Opinions where the agency's presentation makes it clear that what is being offered is personal opinion rather than fact or the agency's views

## **III. Types of Information Disseminated by AoA to the Public**

Each year, AoA produces a number of publications of various types, and about 500 static Web pages. All publications that carry the AoA imprimatur, i.e. are considered official AoA publications or releases and must follow AoA procedures for appropriate for that type of material (see Section V). The types of information disseminated by AoA to the public include the following:

### **1) Programmatic Analyses and Evaluations**

This category includes program reviews, evaluations and recurring reports. Analyses of project results may be developed and used for many purposes, including meeting annual reporting requirements, such as the Government Performance and Results Act (GPRA). Highlights of evaluations and analyses may be on the AoA Web site, and used in testimonies and speeches by AoA officials.

### **2) Reports, Monographs, and Technical Assistance Materials**

These are generally authored or co-authored by AoA staff analysts as part of their official

duties or leading professionals in the field under contract. Such reports typically either provide technical assistance information to agencies and service providers working in aging, provide statistical compilations (typically of Census demographical data which is needed by aging agencies and they plan services) or the reports may address a program or policy issue of concern.

### **3) Consumer Information**

AoA provides a number of resources for the general consumer to learn about a variety of aging related concerns such as health information, housing programs available to older people and how to access the service system. A considerable amount of this information is distributed through AoA Center for Communications and Consumer Services(CCCS). Other sources of consumer information include distribution by other AoA staff and the AoA web site.

### **4) Oral information, including speeches, interviews**

AoA executives and experts make frequent speeches on a variety of issues relating to aging and are interviewed by the media (only if representing AoA's views, official positions, or policies) as well as written op-ed and similar editorial materials.

## **IV. Types of Dissemination Methods**

**AoA information is disseminated in many mediums, with the following being most common:**

- 1. Print**— publications, books, newsletters, brochures, booklets, pamphlets, and reports.
- 2. Oral**—formal speeches, oral presentations, interviews, or commentaries for publication or broadcast; letters-to-the-editor or correspondence likely to result in similar publications.
- 3. Electronic**—The AoA Web site is a Central Information Resource in Aging. It is also a vehicle for enhancing the way AoA carries out its business operations. To accomplish this dual mission, AoA must put the needs of its users first. It serves as a dynamic source of credible, reliable and timely information and technical assistance designed to support our network, aging service providers, older people and their families in the daily conduct of their lives and work as well as helping the agency carry out its various business operations.

## **V. Quality Assurance Policies, Standards, and Processes for Ensuring the Quality of Information Disseminated to the Public**

### **Overview**

All AoA documents must be prepared in accordance with professional and ethical standards, as well as generally accepted standards of good taste. They must be appropriate for dissemination by this agency, and must undergo appropriate review and approval prior to release. AoA efforts to ensure and maximize information quality begin at the preparation stage, and continue through the review and approval stages. Existing AoA policies developed in concert with Federal computer security laws provide appropriate security safeguards to ensure integrity of AoA documents, i.e., ensure that the information is protected from unauthorized access, revision, corruption, or falsification.

AoA has quality control measures embedded in its grant application review process to ensure that the information ultimately disseminated is of high quality. AoA grant applications undergo extensive professional review.

### **AoA Information Review and Approval Policies and Procedures**

Publications are expected to meet high standards of quality, make a substantial contribution to the field, and contain sufficient information for the informed audience to assess its validity. The review, approval, and dissemination of substantive information by AoA require adherence to appropriate clearance procedures for this type of material and are consistent with HHS guidelines. The originating office is responsible for obtaining the necessary clearances for reproduction and distribution of printed materials and should ensure that written material distributed is appropriate and consistent with HHS policy. A document that has obtained publication clearance for paper printing is often posted on the AoA web site for greater accessibility. AoA Web documents with no print counterpart require content clearance by the appropriate AoA office or contact person to ensure that the information observes all applicable requirements governing information for release to the public.

As noted above, AoA issues four types of information:

1. **Programmatic Analyses and Evaluations**
2. **Reports, Monographs, and Technical Assistance Materials**
3. **Consumer Information**
4. **Oral Information**

**The information review and approval process is essentially the same for each of these types of information. Such information must meet the following guidelines which AoA employs to assure the quality of its information products, including their utility, objectivity, and validity:**

**Utility** involves the usefulness of the information to its intended users. Utility is achieved by staying informed of information needs and developing and information products which are appropriate to these needs. This is achieved by: internal analyses of information requirements, continuous informal discussions and consultation with members of the aging services network, project grantees and other experts in the field, consultation with consumer groups, convening and attending conferences, working with professional groups, and sponsoring outreach activities. Where appropriate, contact information is available on each publication to allow feedback and questions by users.

**Objectivity** involves a focus on ensuring that information is accurate, reliable and unbiased and that information products are presented in an accurate, clear, complete and unbiased manner. Objectivity is achieved by using reliable data sources and sound analytical techniques, and preparing information products that use proven methods by qualified people that are carefully reviewed.

**Integrity** - Information contained in analytical reports and technical assistance materials is based on valid and reliable data sources which are identified. All reports and materials are reviewed by technically qualified staff to ensure that analysis is valid, complete, unbiased, objective and relevant. Materials that are considered to be more technically complex are also reviewed by subject matter experts and other AoA program experts outside of the originating

component to provide additional perspective and expertise.

## **Administrative Requirements**

AoA printed publications must be cleared through the Assistant Secretary for Aging and the Office of the Assistant Secretary for Public Affairs (OASPA), HHS. Similarly, all AoA Audio/Visual projects and exhibits must be cleared through OASPA.

In general, any writing by an AoA employee on a work-related subject, whether intended for electronic or print publication, or for oral delivery, must be prepared according to accepted AoA standards of quality, reviewed for substantive content, and administratively approved. The purpose of the AoA clearance process is to improve the quality of information, and to ensure the accuracy, objectivity, utility, and validity of information. Directors of AoA component units (or their delegates) are responsible for establishing and maintaining controls to ensure competent and timely clearance of professional writing and presentations by developing procedures appropriate to the type of information.

Oral information, including speeches, interviews, expert opinions, only if representing AoA views, official positions, or policies, including any statements, comments, or discussion of Federal policies or practices that are relevant to the employee's position or duties, draw conclusions, advocate or oppose professional practices or positions on subjects related to AoA duties, or might otherwise be construed as reflecting an official position by AoA, HHS, or the Federal Government, are covered by the OMB Guidelines, and must be approved in the Office of the Assistant Secretary for Aging or the Director of CCCS, AoA.

No review or approval is required for nonofficial and private writing, speaking, and publishing by an employee unless his/her AoA employment is likely to be regarded as influencing the content.

## **Special Considerations for Agency Dissemination**

### **Disclaimers**

Normally, the need for a disclaimer is eliminated through the clearance process. However, a disclaimer may still be needed even after official clearance to clarify that the presentation should not be construed as necessarily representing AoA views, and/or to distinguish the status of information (e.g., preliminary, based on partial data set). The Department's regulations (Standards of Conduct) to which the AoA subscribes, require that disclaimers be used in all unofficial writing and editing related to the employee's official duties and/or affiliation with programs of the Federal Government in which the employee's identification with AoA is to be shown, can be inferred, or is well-known.

## **AoA Center for Communications and Consumer Services(CCCS)**

The Center for Communications and Consumer Services(CCCS), a unit of AoA, is a central source for a wide variety of consumer as well as program- and policy-related materials and demographic and other statistical data on the health, economic, and social status of older Americans. CCCS services include the following: inquiry response, repository of AoA-funded research products, a bibliographic database of AoA-funded r&d products and other aging-related products, a reading room and reference collection, and statistical information

At AoA, there are essentially three types of materials being disseminated through information services to the public: (1) Materials produced by AoA staff or contractors that undergo usual AoA review and approval processes; (2) materials produced by AoA grantees that are subject to policies and procedures in the AoA Grants Administration Manual; and (3) other materials not produced by AoA but available from a variety of professional sources (e.g., brochures handbooks, statistical tables, articles) whether in print or in electronic format, with appropriate disclaimers attached. Non-Federal materials typically undergo careful professional review before they are disseminated by AoA information staff. Such materials are accompanied by appropriate disclaimers.

## **Web Site Information**

AoA has designated content area experts to develop or recommend material for inclusion on the AoA web site. These content area specialists periodically review material on the Web page to determine whether it is accurate and up to date. Information, particularly time-sensitive information, should be posted as soon as possible. Web page creators are expected to promptly update or remove out-of-date information.

Unless noted otherwise, information posted on pages within the "AoA.Gov" domain is considered to be "in the public domain." As such, others are free to establish links to AoA online resources. In establishing such links, AoA requests that others avoid creating the impression that AoA is endorsing or promoting any particular product or service. In the same vein, any outside link to an external resource from an AoA Web site is examined on a case-by-case basis. In general, the content manager for each page determines when links to outside entities are justified.

AoA web pages containing links to external web pages not located on AoA servers should include a link to a statement that releases AoA from responsibility for the material included in the external Web page. Again, it is important to avoid giving a user the impression that AoA is endorsing information or a service or product described in an external site.

## **VI. Agency Administrative Complaint Procedures**

### **Responsible Official**

The AoA official with overall responsibility for receiving and resolving complaints regarding information that does not comply with agency's guidelines for data quality is the Director of the Center for Communications and Consumer Services (CCCS). The Director of CCCS will have overall responsibility for implementing AoA Information Quality Guidelines, and will work collaboratively with other units in AoA.

### **1. Responsibility of the Complainant**

To seek a correction under Section 515 of Public Law 106-554 of information disseminated by the agency, individuals should follow the procedures described below. A) A complaint or request for review and correction of information shall be in written hard copy or electronic form; B) it shall be sent to the agency by mail or electronic-mail(e-mail); and C) it shall state that a request for correction of information is being submitted under Section 515 of Public Law 106-554. The complaint shall contain D) a detailed description of the specific material that needs to be corrected including where the material is located, i.e. the publication title, date, and

publication number, if any, or the web site and web page address (url), or the speech title, presenter, date and place of delivery; and E) the specific reasons for believing the information is in error and supporting documentation, if any; F) the specific recommendations for correcting the information; G) a description of how the person submitting the complaint is affected by the information error; and H) the name, mailing address, telephone number, e-mail address, and organizational affiliation, if any, of the individual making the complaint.

All complaints shall be sent to:

*Director, Center for Communications and Consumer Services  
Administration on Aging  
330 Independence Avenue, SW  
Washington, DC 20201*

Complaints submitted via electronic mail should be sent to: [dataquality@aoa.gov](mailto:dataquality@aoa.gov)

## **2. Responsibility of the Agency**

Based on a review of the information provided, the agency will determine whether a correction is warranted and if, so what action to take. The agency will respond to the requestor by letter or e-mail. The agency's response will explain the findings of the review and the actions that the agency will take, if any. The response will consider the nature and timeliness of the information involved and such factors as the significance of the correction on the use of the information and the magnitude of the correction. The response will describe how the complainant may request reconsideration. The agency will respond to all requests for correction within 45 working days of receipt. If the request requires more than 45 working days to resolve, the agency will inform the complainant that more time is required and indicate the reason why and an estimated decision date.

## **3. Appeals**

If the individual submitting the complaint does not agree with the agency's decision (including the corrective action, if any), the complainant may send a written hard copy or electronic request for reconsideration within 30 days of receipt of the agency's decision. The appeal shall state the reasons why the agency response is insufficient or inadequate. Complainants shall attach a copy of their original request and the agency response to it, clearly mark the appeal with the words, "Information Quality Appeal," and send the appeal to the specific agency appeals address.

The agency official who resolved the original complaint will not have responsibility for the appeal. Appeals will be decided by the Director, Center for Wellness and Aging and should be addressed to:

*Director, Center for Wellness and Aging  
Administration on Aging  
330 Independence Avenue, SW  
Washington, DC 20201*

## **VII. Influential Scientific, Financial, and Statistical Information**

The OMB Information Quality Guidelines require that “influential” scientific, financial, or statistical information in official Government documents must be based on studies that can be substantially reproduced if the original or supporting data were to be independently reanalyzed using the same methods. “Influential” when used in the phrase “influential scientific, financial, or statistical information” means that the AoA can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions, or will have important consequences for specific health practices, technologies, substances, products, or firms.

AoA is committed to applying rigorous professional standards to ensure the accuracy and reliability of research results. For professional and technical documents, AoA regularly seeks input from qualified analysts and experts from both within and outside AoA to insure that these influential materials are appropriate, accurate, complete, and of high quality (including objective, useful, and valid) prior to dissemination.

AoA continues to encourage the sharing of data and methods where practicable. Since the influence and implications of AoA-disseminated information cannot always be fully anticipated, all AoA reports are expected to state clearly how analytic results are generated—the specific data used, various assumptions, specific analytic methods, statistical procedures, sources of error—making the analysis sufficiently transparent so as to be capable of being reproduced. AoA advocates the archiving of data where feasible to facilitate the reproducibility of influential information.

## **VII. References**

DHHS Standards of Conduct Regulations (45 CFR 73.735-705). Updated October 1, 2000.

The HHS Printing Handbook, September 1998.

AoA Administrative Procedures Manual, 2001.

AoA Grants Administration Manual

Office of Management and Budget Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies. Final Guidelines. January 3, 2002. <http://www.whitehouse.gov/omb/fedreg/reproducible.html>

OMB, Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies.

OMB, Circular No. A-130, Revised (Transmittal Memorandum No. 4). Management of Federal Information Resources. November 30, 2000.

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