



United States  
Department  
of Agriculture

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Economic Research Service

[www.ers.usda.gov](http://www.ers.usda.gov)

# Draft Report of the Economic Research Service's Information Quality Guidelines

## Request for Public Comment

### Purpose

The U.S. Office of Management and Budget (OMB) has issued government-wide guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by Federal agencies. Congress directed OMB to issue these guidelines in section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554). OMB published its guidelines in the Federal Register on September 28, 2001, at [66 FR 49718-49725](#) and updated the guidelines on February 22, 2002, at [67 FR 8452-8460](#) and on March 4, 2002, at [67 FR 9797](#).

OMB's guidelines require Federal agencies subject to the Paperwork Reduction Act (44 U.S.C. Chapter 35) to: (1) issue information quality guidelines for the information disseminated by the agency; (2) establish administrative mechanisms allowing affected persons to seek and obtain correction of information maintained and disseminated by the agency that does not comply with OMB or agency guidelines; and (3) annually report to OMB the number and nature of complaints received by the agency regarding agency compliance with OMB and agency guidelines and how such complaints were resolved.

As the initial step in its development of information quality guidelines, each Federal agency must prepare a draft report no later than May 1, 2002, providing its guidelines and detailing the administrative mechanisms developed by the agency to allow affected persons to seek and obtain correction of information disseminated by the agency, and post the draft report on the agency's website to provide an opportunity for public comment. With this website posting, ERS is requesting public comments on the following draft guidelines. Please note that the ERS Guidelines supplement the U.S. Department of Agriculture's (USDA's) Information Quality Guidelines, and that ERS will be subject to both guidelines.

## To Comment

Interested parties are asked to address the following when submitting comments to ERS:

1. Are ERS's draft guidelines adequate for ensuring the objectivity, utility, and integrity of the information it disseminates as set out in OMB's notices of September 28, 2001 and February 22, 2002?
2. Are ERS's procedures for allowing affected persons to seek and obtain correction of information appropriate and consistent with OMB requirements?

***Deadline for Comments:*** The deadline for comments on ERS's draft information quality guidelines is May 31, 2002.

***Address for Comments:*** Send comments to Dr. Philip N. Fulton, Associate Administrator, Economic Research Service, 1800 M Street, NW, Washington, DC 20036. Comments may also be sent by fax to (202) 694-5757 or by e-mail to [pfulton@ers.usda.gov](mailto:pfulton@ers.usda.gov).

***For Further Information, Contact:*** Dr. Philip N. Fulton, Associate Administrator, Economic Research Service, 1800 M Street, NW, Washington, DC 20036. Telephone (202) 694-5000.

# Requirements of OMB'S Information Quality Guidelines for Federal Agencies

OMB's guidelines direct agencies to adopt specific standards of quality that are appropriate for the various categories of information the agency disseminates. OMB defines "information" as "any communication or representation of knowledge such as facts or data in any medium or form." OMB defines "dissemination" as "agency initiated or sponsored distribution of information to the public." OMB defines "quality" as an encompassing term, comprising objectivity, utility, and integrity.

To ensure and maximize the quality of information disseminated by Federal agencies, including its objectivity, utility, and integrity, OMB's guidelines instruct agencies to treat information quality as integral to every step of the agency's development of information, including creation, collection, maintenance, and dissemination. This process will enable the agency to substantiate the quality of the information it has disseminated through documentation or other means appropriate to the information. Most importantly, the OMB guidelines require agencies to develop a process for reviewing the quality of information before it is disseminated to the public to ensure that it meets OMB's standards for objectivity, utility, and integrity.

## The Objectivity Standard

To meet the OMB objectivity standard, information disseminated by a Federal agency must be substantively accurate, reliable, and unbiased and be presented in an accurate, clear, complete, and unbiased manner. Data must be generated and analytic results must be developed using sound statistical and research methods. Agencies must identify the sources of the disseminated information, the methods used to produce it, and provide full, accurate, and transparent documentation.

Information the agency deems to be "influential scientific, financial, or statistical information" also must be reproducible to demonstrate its objectivity.

## The Reproducibility Standard for Influential Scientific, Financial, or Statistical Information

Under OMB's guidelines, "influential scientific, financial, or statistical information" means that the agency 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. Agencies that disseminate influential scientific, financial, or statistical information must ensure a high degree of transparency about data and methods to facilitate the reproducibility of such information. Reproducibility means that there is the capability to use the documented methods on the same data set to achieve a consistent result. In its guidance, OMB states: "The purpose of the reproducibility standard is to cultivate a consistent agency commitment to transparency about how analytic results are generated: the specific data used, the various assumptions employed, the specific analytical methods applied, and the statistical procedures employed. If sufficient transparency is achieved on



# ERS's Information Quality Guidelines

## Information Disseminated by ERS

ERS is the main source of economic information from the USDA. The mission of ERS is to inform and enhance public and private decision-making on economic and policy issues related to agriculture, food, natural resources, and rural development. To accomplish this mission, ERS economists and social scientists develop and disseminate a broad range of economic, social scientific, and statistical information to the public. The program encompasses research; analyses of food and commodity markets; policy studies; development of estimates, forecasts, and other economic and statistical indicators; and development of data sets compiled from diverse sources or collected under ERS sponsorship. ERS disseminates its information to the public through an array of outlets, including: the ERS website ([www.ers.usda.gov](http://www.ers.usda.gov)), which provides original material as well as access to most ERS publications, economic and statistical indicators, and data sets; agency-published research reports, market analyses and outlook reports, and articles published in ERS periodicals; articles published in professional journals; and papers presented at the annual meetings of scientific and professional organizations.

## ERS's Commitment to Quality

OMB's guidelines for the objectivity, utility, and integrity of information disseminated by Federal agencies are encompassed by the Federal statistical agencies' requirements that the statistics they produce must be accurate, timely, relevant, and accessible to data users. As a Federal statistical agency, ERS is committed to quality and professional standards of statistical practice. ERS uses modern statistical and economic theory and practice in all technical work; develops strong staff expertise in economics, agricultural economics, statistics, sociology, and other disciplines relevant to its mission; implements ongoing quality assurance programs to improve data validity and reliability and to improve the processes of compiling, editing, and analyzing data; and develops strong and continuing relationships with appropriate professional organizations in relevant subject-matter areas.

To carry out its mission, ERS assumes responsibility for determining sources of data, measurement methods, and methods of data collection and processing; employing appropriate methods of analysis; and ensuring the public availability of the data and documentation of the methods used to obtain the data. Within the constraints of resource availability, ERS continually works to improve the quality of its research and its data systems to provide the information necessary for the formulation of informed public policy.

In striving for the widest possible dissemination and greatest usefulness of its data, ERS establishes a publications policy that addresses the types of reports and other data releases to be made available; the frequency and timeliness of such releases; the variety of avenues for data dissemination and formats; and policies for the preservation of data. ERS seeks advice on specific data concepts, methods, and products from data users and from other professional and technical subject-matter and methodological experts, as well as on

## Applicability of ERS's Information Quality Guidelines

its statistical program as a whole, including the setting of program priorities and on the statistical methodologies it uses. ERS strives to meet the needs for access to data while maintaining appropriate safeguards for the confidentiality of individual responses.

### *Information that ERS has Determined NOT to be Subject to ERS's Information Quality Guidelines*

In its guidance to Federal agencies, OMB states that its guidelines focus primarily on the dissemination of substantive information such as reports, studies, and summaries rather than information pertaining to basic agency operations. Furthermore, the OMB guidelines specifically exclude certain types of information from coverage under OMB or agency information quality guidelines. Therefore, based on the OMB guidance, ERS has determined that the following types of information are not subject to ERS's Information Quality Guidelines:

Information pertaining to basic agency operations:

- Information describing basic ERS operations and activities.
- Internal ERS procedural, operational, and policy manuals that are not intended for public dissemination.

Information excluded by OMB from coverage under OMB or agency guidelines:

- Opinions, where ERS's presentation makes it clear that what is being offered is someone's opinion rather than fact or the agency's views.
- Information disseminated by an ERS grantee, contractor, or cooperator who publishes and communicates his or her research findings in the same manner as his or her academic colleagues where the dissemination is not initiated or sponsored by ERS.
- Information for which distribution is limited to government employees, agency contractors, or grantees.
- Intra- or inter-agency use or sharing of government information.
- Responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar law.
- Distribution of information limited to correspondence with individuals or persons, press releases, or archival records, public filings, subpoenas, or adjudicative processes.
- Archival information disseminated by Federal agency libraries.
- Hyperlinks from the ERS website to information that others disseminate.

## ***Information that ERS has Determined to be Subject to the ERS Information Quality Guidelines***

Based on the OMB guidance, ERS has determined that the following types of information are subject to ERS's Information Quality Guidelines:

- All substantive information—including research reports, periodicals, market analysis and outlook reports, economic indicators, data sets, and other substantive information products—that ERS disseminates to the public on or after October 1, 2002 via its website, in printed form, or in any other medium.
- ERS initiated or sponsored distribution to the public of substantive information such as research reports, studies, and data sets by ERS grantees, contractors, or cooperators on or after October 1, 2002.

### **Guidelines**

The guidelines below describe the principles that ERS will follow to ensure the quality of the information it disseminates to the public, including its objectivity, utility, and integrity.

### **Objectivity**

Objectivity means ensuring that information is accurate, reliable and unbiased and that information is presented in an accurate, clear, complete and unbiased manner. ERS ensures the objectivity of the information that it disseminates by using reliable data from reliable sources; using sound analytical techniques; providing transparent documentation of data sources, methods, and sources of error; and by carefully reviewing the information prior to its dissemination to ensure that it is accurate, reliable, and unbiased.

#### ***Use Reliable Data from Reliable Sources***

Most of the research, analyses, and economic estimates, forecasts, and indicators produced and disseminated by ERS are based on data obtained from other U.S. government agencies, other information organizations, the private sector, or foreign organizations. ERS relies on sources of data that were developed using methodologies that are consistent with generally accepted professional standards. Before using data obtained from other sources, ERS evaluates their quality. The data are checked for internal consistency, consistency with other similar data sets or previous versions of the same data set, and sources of error. Knowledgeable ERS subject matter experts conduct “reasonableness” checks of the data. Where necessary, ERS edits the data and imputes missing values using established statistical techniques to improve the utility of the data. ERS staff using the data are knowledgeable about the content, structure and limitations of the data files and maintain working relations with staff who create, update and maintain these files in their source organizations.

ERS-sponsored surveys are conducted by reputable survey organizations using methodologies that are consistent with generally accepted professional standards for all aspects of survey development, including sample frame development, statistical design of the survey sample, questionnaire design and testing, data collection, sampling and coverage errors, nonresponse

analysis, imputation of missing data, weighting, and variance estimation. ERS surveys follow guidelines and policies set forth in the Paperwork Reduction Act and other regulations related to the conduct of U.S. government surveys.

### ***Use Sound Analytical Techniques***

ERS staff prepare research reports using a variety of analytical techniques, ranging from simple tabulations and descriptive summary statistics to multivariate statistical methods and econometric models. Analytical techniques are reviewed for conformity with disciplinary standards, for their appropriateness to the data and the analysis being conducted, and are clearly identified in reports. Analysts are knowledgeable about the data sources and the methodologies and models used.

ERS utilizes several economic and statistical models to make estimates of the effects of demographic and economic trends and legislative and policy options on agricultural programs and beneficiary populations now and in the future. Models used by ERS have detailed documentation that describes the goals and objectives of the model, the data sources used, and the methodologies and assumptions employed.

ERS tests and reviews the models it uses to verify that the computer programs that were developed to implement the models conform to the stated objectives. Where appropriate, simulations are developed to evaluate the success of a model in producing reasonable results. ERS models are based on ERS's best judgements of current and future behavioral relationships and methods of projecting key program outcomes. These models are periodically updated to reflect input from internal and external reviews and research findings on behavioral relationships.

### ***Provide Transparent Documentation of Data Sources, Methods, and Sources of Error***

In all its reports, ERS identifies the sources of the data used in the report, either for the publication as a whole or for individual tables, and, as appropriate, describes the limitations of the data and sources of error. ERS also provides a description of the methodology used to produce the research results. When analyses are based on model results, the model or a clear description of the model is presented, and the assumptions used to produce the results are also identified as well as the rationale for the assumptions used and the impact of using alternative assumptions.

ERS data products are accompanied by accurate, transparent documentation that describes the source of the data, the methodology used to produce the data, definitions of the data items and variables contained in the data set, sources of error, and, if applicable, limitations of the data.

***Carefully Review Information Prior to Dissemination to Ensure It Is Accurate, Reliable, and Unbiased***

Irrespective of the customer, high-quality research and analysis is the foundation for all ERS products. Peer review is an essential element for assuring high-quality research and stands at the center of the clearance process. The agency's clearance process improves our research and analysis by providing a screen, not only for the quality of the research, but for accuracy in the representation of policy and programs, as well.

ERS research reports must meet disciplinary standards of quality and peer review. All research reports receive substantive peer reviews by qualified experts who have the background, perspective, and technical competency to provide a meaningful assessment of the research design and findings. To ensure an objective review of the quality of the research (problem definition, methodology, and analysis), each report is subjected to both internal and formal, independent, external peer review. In addition, to improve the policy component of our empirical research and to mitigate potential inconsistencies with program agencies, publications that involve other USDA or Federal programs are reviewed by researchers/analysts from the relevant program agency.

ERS Outlook Reports, which provide commodity market analysis and statistical and economic indicators of the food and agriculture system, are reviewed by peers within ERS and, depending on the specific topic, by subject specialists/analysts in other USDA agencies. Following ERS review and clearance, Outlook reports are reviewed and cleared at the Department level by the World Agricultural Outlook Board, the office that coordinates USDA's supply, demand, and price outlook activities.

ERS periodicals follow a review and clearance process similar to that for research reports, except not all articles undergo external peer review. Articles are reviewed by peers within ERS and by other USDA or Federal agencies whose mission the articles discuss.

All ERS publications undergo USDA policy review and clearance before they are released.

Data products produced by ERS are thoroughly reviewed by knowledgeable staff prior to dissemination to verify the validity of the data. The data are checked for internal consistency, consistency with other similar data sets or prior year versions of the same data set, and for sources of error. Knowledgeable ERS subject matter experts conduct "reasonableness" checks of the data. Where necessary, the data are edited and missing values are imputed using established statistical techniques to improve the utility of the data. Data products that provide commodity or farm sector forecasts are reviewed and cleared at the Department level by the World Agricultural Outlook Board.

## Reproducibility of Influential Statistical Information

Statistical information is considered influential if the agency determines that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions. If an agency is responsible for disseminating influential statistical information, agency guidelines for that information must require a high degree of transparency about data and methods to facilitate its reproducibility by qualified third parties. Analytic results using influential statistical information must be “capable of being substantially reproduced,” meaning that independent analysis of the original or supporting data using identical methods would generate similar analytic results, subject to an acceptable degree of imprecision or error.

### *Disseminate Influential Statistical Information with a High Degree of Transparency about Data and Methods*

Since much of the statistical and analytical information that ERS disseminates potentially has an impact on important public policies or important private sector decisions, ERS maintains a consistent agency commitment to transparency about how its research results and its economic and statistical indicators are produced. ERS identifies and documents the specific data used and provides descriptions of the specific analytical methods used and statistical procedures employed. Some estimates and projections included in ERS information products are not directly reproducible by the public because the underlying data sets used to produce them are confidential. Others may not be easily reproduced by third parties due to the complexity and detail of the methods and data. In these cases, ERS endeavors to provide a sufficiently detailed explanation of the methods use to produce the data and the analysis thereof to allow appropriately qualified persons to conclude that if they used the same or similar methodology on the same data, they could expect to achieve similar findings and results.

## Utility

Utility involves the usefulness of the information to its intended users. Utility is achieved by staying informed of information needs and developing new data, models, and information products where appropriate, making information widely available and easily accessible, and helping users understand and use our products.

### *Ensure ERS Information Products Meet Customer Needs*

ERS has identified its customers to be policy makers and key institutions that routinely make or influence public policy and program decisions related to food, agriculture, the environment, and rural development. ERS shapes its programs and products principally to serve these key decision makers: USDA and White House policy officials and program managers; the Congress; other Federal agencies; State and local government officials; and domestic and international commodity, environmental, agribusiness, consumer, and other groups interested in public policy issues.

ERS staff keep abreast of information needs by regularly consulting with policy and program officials, conducting forward-looking program planning to produce research and data that anticipate policy issues, convening and

attending conferences of researchers and policy makers, working with advisory committees, and sponsoring outreach activities. When major needs for data are identified that cannot be met with existing sources available within or outside the Federal Government, ERS sponsors special-purpose surveys (within the limits of available resources) to address those needs.

ERS reviews its publication series and other information products on an ongoing basis to ensure that they remain relevant and address current information needs. Based on these internal product reviews, consultation with users, and in response to changing needs and emphases, ERS changes the content of ongoing information products, introduces new products, and discontinues others. ERS prepares reports and topical studies that address emerging information needs stemming from proposed changes in the law and related policy debates.

***Make Information Disseminated by ERS Widely Available and Easily Accessible***

ERS makes most of its research reports, data products, and other information available on its website to make the material accessible. The website is extensively cross-indexed to allow users to find information pertaining to the topic of interest. Customers can browse or search ERS publications and data products by title, topic, or date. Data products are provided in formats for downloading, and some data sets are provided with software that allows users to prepare and download custom tabulations. The website also provides users with a calendar to keep track of the scheduled release of ERS products, and users can sign up to receive weekly announcements of the latest reports and other products via e-mail notification.

***Ensure Information Disseminated by ERS is Understandable***

To provide customers with a convenient way to gain an in-depth understanding of the topics and issues pertinent to food, agriculture, natural resources, the environment, and rural development, ERS has organized the material on its website into “briefing rooms” by key topics and by research emphases.

Each briefing room synthesizes ERS research and economic issues that frame the analysis. Briefing rooms also contain recent ERS research developments, readings and data, questions and answers, and a collection of other ERS products and services addressing the issue. Briefing rooms continue to expand and evolve to reflect ongoing ERS research and current issues.

“Key topics” on the ERS website are topics for which ERS offers a significant body of research and analysis. Each topic page provides a collection of data, publications, and other products and services. Customers may also obtain information from the ERS website organized by the five major areas of research derived from the ERS strategic plan.

The ERS website also provides customers with the names, e-mail addresses, and telephone numbers of ERS subject specialists in more than 200 research areas. Where appropriate, ERS provides contact information on each publi-

## Integrity

cation (and in some cases on each table of a publication) and each data set to allow feedback and questions by customers.

Integrity 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, ERS has in place rigorous controls that have been identified as representing sound security practices. ERS addresses internal and external data and information content integrity threats using a variety of standard methods depending on content sensitivity and exposure.

### ***Ensure Information Maintained by ERS is Secure from Unauthorized Internal Access or Revision***

ERS provides internal protection against unauthorized data access or revision by use of appropriate local area network (LAN), database management system (DBMS), application server, and web server security permissions. Generally accessible data are available for retrieval to all internal users with an authorized LAN and/or DBMS ID and password. Retrieval of sensitive data and any data updates or modifications are managed using additional ID/password technology on a restricted use basis, managed by central information technology (IT) staff. The IT staff executes access rules provided by data managers. Physical access to servers is limited to technical staff. Internal data management procedures and strategies for the appropriate handling of sensitive data are governed by the ERS Data Security Policy.

### ***Ensure Information Maintained by ERS is Secure from Unauthorized External Access or Revision***

The primary protection against outside threats to all ERS data and information is the agency firewall software. Systems intended for internal use are protected by this firewall. Authorized access by ERS staff not on the premises or other authorized users is provided by appropriate firewall permissions, proxy servers, or dial-in software. The firewall and proxy servers are centrally managed by IT security staff using access rules provided by data managers. Dial-in access security is accomplished using features of commercial software in addition to normal network security. Physical access to servers and workstations is limited by building security.

Data and information made available to outside customers through the ERS website are protected by web server and web product technologies. No sensitive data are made available through the ERS website. Data tables derived from sensitive or confidential data are preprocessed within the agency and checked for quality and disclosure issues before release. Data and information made available through the agency extranet are protected by a combination of firewall, extranet server security, and extranet application software ID/password and security layers.

ERS is highly protective of any information it holds that was collected under a pledge of confidentiality. ERS is subject to various statutory requirements regarding information, including:

- Privacy Act of 1974
- Freedom of Information Act
- Computer Security Act of 1987
- OMB Circulars A-123, A-127, and A-130
- Government Information Security Reform Act
- Paperwork Reduction Act

# Procedure to Seek Correction of Information Disseminated by ERS

## Background

ERS has developed administrative mechanisms to allow affected persons to seek and obtain correction of information disseminated by ERS on or after October 1, 2002 that does not comply with OMB, USDA, or ERS Information Quality Guidelines. Requestors seeking a correction should follow the procedure described below. For further information about this procedure, contact Dr. Philip N. Fulton, Associate Administrator, Economic Research Service, 1800 M Street, NW, Washington, DC 20036; telephone (202) 694-5000; fax (202) 694-5757; e-mail [pfulton@ers.usda.gov](mailto:pfulton@ers.usda.gov).

The ERS Information Quality Guidelines correction mechanisms are not intended to imply any rights of individuals to request amendment of their own records beyond those permitted by the Privacy Act of 1974 or other organization specific laws.

## Consult with the Contact Persons Listed in ERS Reports and Products Before Filing a Formal Request for Correction

Most ERS reports and data files include the names and e-mail addresses of knowledgeable ERS staff who can assist users in understanding the information presented there and in determining whether, in fact, there is an error that warrants action via the formal correction process. Users of ERS information should consult first with the ERS contact person listed in the product before filing a formal request for correction.

## Where to Submit a Formal Request for Correction

All requests for correction of ERS information must be submitted by letter, fax, or e-mail to Dr. Philip N. Fulton, Associate Administrator, Economic Research Service at the addresses or fax number given above.

## Information That Should be Submitted to ERS with a Request for Correction

Requests for correction of information should include the following elements:

- **Statement that the Request for Correction of Information is Submitted Under ERS's Information Quality Guidelines**

- **Requestor Contact Information**

The name, mailing address, telephone number, fax number (if any), e-mail address (if any), and organizational affiliation (if any) of the person requesting the correction.

- **Description of Information to Correct**

The name of the ERS report or data product, the date of issuance or other identifying information such as the URL of the web page, and a detailed description that clearly identifies the specific information contained in that report or data product for which a correction is being sought.

## ERS Review of the Request for Correction

### ■ **Explanation of Noncompliance with OMB, USDA, or ERS Information Quality Guidelines**

An explanation that describes how the information fails to meet the OMB, USDA, or ERS Information Quality Guidelines.

### ■ **Explanation of the Effect of the Alleged Error**

An explanation that describes how the alleged error harms or how a correction would benefit the requestor.

### ■ **Recommendation and Justification for How the Information Should be Corrected**

The requestor should state specifically how the information should be corrected and explain why the corrections should be made. A request for correction that is specific and provides evidence to support the need for correction is likely to be more persuasive than a request that is general, unfocused, or that simply indicates disagreement with the information in question.

### ■ **Supporting Documentary Evidence**

Supporting documentary evidence, such as comparable data or research results on the same topic, will help in evaluating the request.

This guidance for the content of requests for correction of information is not intended to constitute a set of legally binding requirements. However, ERS may be unable to process, in a timely fashion or at all, requests that omit one or more of the requested elements.

Requestors bear the “burden of proof” with respect to the necessity for correction as well as with respect to the type of correction they seek. ERS will base its decision on the merits of the information provided by the requestor.

The request for correction will be referred to the ERS organizational division responsible for the information or information product in question. Based on the explanation and evidence submitted with the request for correction, the responsible ERS division will conduct a thorough review of the information being challenged, the processes that were used to create and disseminate the information, and the conformity of the information and those processes with both OMB’s and ERS’s Information Quality Guidelines. After it has completed its review, the responsible ERS division will determine whether a correction is warranted, and, if so, what corrective action it will take. Any corrective action will be determined by the nature and timeliness of the information involved, the significance of the error on the use of the information, the magnitude of the error, and the cost of undertaking a correction. ERS is not required to change, or in any way alter, the content or status of information simply because a request for correction has been made.

## **ERS Response to the Request for Correction**

After the responsible ERS division has made its final determination pertaining to a request for correction of information, ERS will respond to the requestor by letter, e-mail, or fax. The response will explain the findings and the actions ERS will take (if any) in response to the complaint.

ERS will normally respond to all requests for correction of information within 45 days of receipt. If the request requires more than 45 days to resolve, ERS will inform the requestor that more time is required, indicate the reason why, and provide an estimated decision date.

## **Right to Request Reconsideration of ERS's Decision**

If the requestor disagrees with ERS's denial of the request or with the corrective action ERS intends to take, the requestor may file a request for reconsideration with ERS.

## **Procedure for Requesting Reconsideration of ERS's Decision**

Persons desiring to file a request for reconsideration should submit the request in written form by letter, fax, or e-mail to Dr. Philip N. Fulton, Associate Administrator, Economic Research Service, at the same address or fax number to which the original request for correction was submitted. Persons requesting reconsideration should submit written material to support their case for reconsideration. They should not resubmit the information originally submitted to support the request for correction.

Requests for reconsideration must be filed with ERS (postmarked or shipped by an overnight delivery service) within 35 days after the date that ERS transmitted its decision on the original request for correction. Requests for reconsideration that are received by ERS after the 35-day deadline will be denied as untimely.

## **ERS Review of the Request for Reconsideration**

The Associate Administrator of ERS will serve as the reconsideration official. The Associate Administrator will review the written material submitted in support of the request for reconsideration, the material submitted with the original request for correction, and the results of ERS's investigation of the matter and then arrive at a decision regarding the request for reconsideration.

## **ERS Response to the Request for Reconsideration**

After the Associate Administrator of ERS has made his decision pertaining to a request for reconsideration, ERS will respond to the requestor by letter, e-mail, or fax. The response will explain the Associate Administrator's decision and the actions ERS will take (if any) in response to the request for reconsideration.

ERS will respond to all requests for reconsideration within 45 days of receipt.

## **Privacy Act Statement**

ERS is authorized to obtain certain information 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, note). Information is needed by ERS to process the request for correction and allow ERS to reply accordingly. This information is needed by ERS to respond to the requestor

and initiate follow-up contact with the requestor if required. Requestors should not send ERS their Social Security Number. Requestors are advised that they do not have to furnish the information but failure to do so may prevent their request from being processed. The information requestors furnish is almost never used for any purpose other than to process and respond to their request. However, ERS may disclose information to a congressional office in response to an inquiry made on behalf of the requestor, to the Department of Justice, a court, other tribunal when the information is relevant and necessary to litigation, or to a contractor or another Federal agency to help accomplish a function related to this process.

## Reporting To OMB

ERS will file an annual report with the Office of the Chief Information Officer (OCIO) of USDA that describes the number and nature of the requests for correction of information received by ERS and how such requests were resolved. The OCIO will file an annual report with OMB on behalf of USDA.