



EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

October 1, 2002

**OFFICE OF MANAGEMENT AND BUDGET  
INFORMATION QUALITY GUIDELINES**

The Office of Management and Budget publishes these **OMB** guidelines in accordance with the Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies (Government-wide Guidelines) published in interim final form by **OMB** in the Federal Register in Volume 66, No. 189 at 49718 on Friday, September 28, 2001, and updated in final form in Volume 2, No. 67 at 8452 on February 22, 2002. These published guidelines were issued pursuant to Section 515 of the Treasury and General Government Appropriations Act for FY2001 (Public Law 106-554; HR 5658). In response to the legislation and the published guidelines, **OMB** identifies the following policies and procedures for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by **OMB**; and it hereby establishes additional procedures for affected persons to seek and obtain correction of information maintained and disseminated by **OMB** that does not comply with standards set out in the Government-wide Guidelines. These **OMB** guidelines are intended to ensure and maximize the quality of information disseminated by **OMB**. Through these **OMB** guidelines, **OMB** establishes as its performance standard a goal of disseminating information consistent with the Government-wide Guidelines and these **OMB** guidelines.

**OMB**'s predissemination review described in these **OMB** guidelines applies to information that **OMB** first disseminates on or after October 1, 2002. The administrative mechanism for correcting information that **OMB** disseminates described in these **OMB** guidelines applies to information that **OMB** disseminates on or after October 1, 2002, regardless of when **OMB** first disseminated the information.

**I. Procedures for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Prior to Dissemination**

In Government-wide Guidelines, "quality" is defined as an encompassing term comprising utility, objectivity, and integrity.

**A. Objectivity and Utility of Information**

1. As defined in Section IV, below, "objectivity" is a measure of whether disseminated information is accurate, reliable, and unbiased and whether that information is presented in an accurate, clear, complete, and unbiased manner. "Utility" refers to the usefulness of the information for the intended audience's anticipated purposes. **OMB** is committed to disseminating reliable and useful information. Before disseminating information, **OMB** staff and officials should subject such draft information to an extensive review process. It is the primary

responsibility of the OMB Division or Office (hereafter collectively referred to as “Division”) drafting information intended for dissemination to pursue the most knowledgeable and reliable sources reasonably available to confirm the objectivity and utility such information.

2. Much of the information OMB disseminates consists of or is based on information submitted to OMB by other Federal agencies. OMB expects that agencies will subject information submitted to OMB for purposes of public dissemination to adequate quality control measures. In drafting the material to be disseminated, the Lead Division should review and verify the data submitted by the agencies, as necessary and appropriate.

3. In seeking to assure the “objectivity” and “utility” of the information it disseminates, OMB should generally follow a quality control process coordinated by the Lead Division drafting information intended for dissemination. The quality control process places responsibility for action upon the Lead Division. The Lead Division should consult with all Divisions throughout OMB having substantial interest or expertise in the material proposed to be disseminated. Where appropriate, substantive input also should be sought from other offices within the Executive Office of the President (EOP), other government agencies, non-government organizations, and the public.

4. The Lead Division should consider the uses of the information from both the perspective of OMB and the public. When it is determined that the transparency of information is relevant for assessing the information’s usefulness from the public’s perspective, the Lead Division should ensure that transparency is appropriately addressed.

5. When the Lead Division determines that the information it will disseminate is influential scientific, financial, or statistical information, extra care should be taken to include a high degree of transparency about data and methods to meet the Government-wide Guidelines’ requirement for the reproducibility of such information. In determining the appropriate level of transparency, the Lead Division should consider the types of data that can practicably be subjected to a reproducibility requirement given ethical, feasibility, and confidentiality constraints. In making this determination, the Lead Division should hold analytical results to a higher standard than original data.

6. When the Lead Division determines that the information it will disseminate is influential scientific, financial, or statistical information, it should assure reproducibility according to commonly accepted scientific, financial, or statistical standards. In situations where public access to the data will not occur, the Lead Division should apply rigorous robustness checks to analytic results and document what checks were undertaken. Also, in such cases, the Lead Division should disclose the specific data sources that have been used and the specific quantitative methods and assumptions that have been employed.

7. The Division responsible for the dissemination of information should generally take the following basic steps to assure the “objectivity” and “utility” of the information to be disseminated:

- a. Preparing a draft of the document after consulting the necessary parties, including government and non-government sources, as appropriate;
- b. Determining/assuring accuracy and completeness of source data;
- c. Determining the expected uses by the government and public;
- d. Determining necessary clearance points;
- e.. Determining where the final decision shall be made;
- f. Determining whether peer review would be appropriate and, if necessary, coordinating such review;
- g. Obtaining clearances; and
- h. Overcoming delays and, if necessary, presenting the matter to higher authority.

8. Hard-copy public dissemination of information and all information published on OMB’s website shall occur only after clearances are obtained from all appropriate Divisions and, as appropriate, the Office of the Director.

9. The quality control procedures followed by OMB should be determined by the nature of the information and the manner of its distribution. Any information collected by OMB and subject to the Paperwork Reduction Act should be collected, maintained, and used in a manner consistent with Paperwork Reduction Act and the OMB information quality standards. The OMB clearance package should demonstrate that the proposed collection of information will result in information that will be collected, maintained, and used in a way consistent with the Government-wide Guidelines and OMB guidelines.

10. These guidelines focus on procedures for the “dissemination” of “information,” as those terms are defined herein. Accordingly, procedures specifically applicable to forms of communication outside the scope of these guidelines, such as those for correspondence or press releases, among others, are not included.

Conclusion: OMB will maximize the quality of the information it disseminates, in terms of objectivity and utility, first by looking for input from a range of sources and perspectives, to the extent practicable under the circumstances, and second by subjecting draft materials to a review process involving as many Divisions and offices as may be in a position to offer constructive input, as well as other offices within the Executive Office of the President and other government agencies.

## B. Integrity of Information

1. “Integrity” refers to the security of information – protection of the information from unauthorized unanticipated, or unintentional modification – to prevent information from being compromised through corruption or falsification.
2. Within the Executive Office of the President (EOP), the Office of Administration has substantial responsibility for ensuring the “integrity” of information as defined in these guidelines. OMB also has an Administration Office that coordinates and works with the EOP Office of Administration to ensure the integrity of information. These offices implement and maintain new computer software and hardware systems and provide operational support for systems and system users.
3. Computer security is the responsibility of the EOP Office of Administration’s Chief Information Officer, Information Assurance Directorate. This Office oversees all matters relating to information integrity, including the design and implementation of the security architecture for the EOP, periodic audits of security architecture components, and review and approval of changes to the technical baseline. By law and OMB policy, EOP’s IT security policy, procedures, and controls are risk-based, cost-effective, and incorporated into the life-cycle planning of every IT investment. Additionally, the Office: assesses risks to its systems and implements appropriate security controls; reviews annually the security of its systems; and develops plans to remediate all security weaknesses found in independent evaluations and other security audits and reviews.
4. As an agency under the EOP, OMB is an integral part of the overall EOP network, and is an active participant in all aspects of information integrity at EOP. OMB adheres to both law and OMB IT security policies, along with EOP security policies and operational processes for the protection of OMB's data and information. This includes ensuring that controls to protect the security of information (and the integrity of information are risk-based, cost-effective, and incorporated in to the life-cycle planning of every IT investment). OMB’s systems are reviewed annually in accordance with existing law and policy and corrective action plans are developed to address all weaknesses, such as integrity issues.

### **Section 11. Requests for Correction of Information Publicly Disseminated by the Office of Management and Budget**

OMB works continuously to be responsive to users of its information and to ensure quality. In furtherance of these objectives, when OMB receives any information from the public that raises questions about the quality of the information it has disseminated, OMB duly considers corrective action. The purpose of this corrective action is to serve the genuine and valid needs of OMB without disrupting OMB processes, and to deal with information quality matters, not to resolve underlying substantive policy or legal issues.

1. Persons seeking to correct information affecting them that was publicly disseminated by OMB may submit a Petition for Correction to the Data Quality Coordinator, addressed to the Assistant Director for Administration, Office of Management and Budget, Washington, D.C. 20503. Submission should be made to the Data Quality Coordinator by e-mail (<correction@omb.eop.gov>), fax (202/395-3174) or mail. A member of the public who seeks correction of information under these OMB guidelines has the burden of proof with respect to the necessity for correction as well as with respect to the type of correction requested. Requests for correction must include:

- (a) a statement that the communication is a Petition for Correction under the OMB Information Quality Guidelines;
- (b) identification of the OMB information or OMB information dissemination product, and the specific aspect(s) thereof, that is the subject of the petition;
- (c) a specific description of how the information does not comply with these OMB guidelines or OMB's Government-wide Guidelines and how they are affected by the information;
- (d) all supporting evidence which the petitioner believes provides a persuasive case and all supporting documentation necessary to resolve the complaint; and
- (e) the specific corrective action sought, including (if applicable) temporary corrective action pending full resolution of the complaint.

2. If the information disseminated by OMB and contested by an affected person was previously disseminated by another Federal agency in virtually identical form, then the complaint should be directed to the originating agency.

3. Requests will be received by the Data Quality Coordinator. Typically, requests raising substantive issues will be forwarded to the Division within OMB responsible for the subject area.

4. These guidelines apply only to requests submitted as outlined above. These guidelines will not be applied to any other form of request and also may not be applied to a request submitted consistent with the procedures outlined above, if OMB determines it is not submitted by an *affected* person for the correction of publicly *disseminated information* of the Office of Management and Budget.

5. OMB normally will respond to the request within 60 days of receipt. If the request requires more than 60 days to resolve, OMB will inform the requestor that more time is required and indicate the reason why and an estimated decision date. If a request is deemed frivolous, made in bad faith or without justification, no response will be made.

6. For covered requests, the Division reviewing the request will give the request due consideration, including a review of the disseminated information at issue and other materials, as appropriate. Where the reviewing Division or office determines that the information publicly disseminated by OMB warrants correction, it should consider appropriate corrective measures recognizing the potential implications for OMB and the United States.

7. When considering covered requests to determine whether a corrective action is appropriate, the reviewing Division may also consider the following factors:

- (a) The significance of the information involved and
- (b) The nature and extent of the request and the public benefit of making the requested correction.

8. Subject to applicable law, rules and regulations, if OMB determines that a request is covered by these guidelines and that corrective action is appropriate, OMB may take corrective measures through a number of forms, including (but not limited to): personal contacts via letter or telephone, form letters, press releases or postings on the OMB website to correct a widely disseminated error or address a frequently raised request. Corrective measures, where appropriate, should be designed to provide reasonable notice to affected persons of such correction.

9. In cases where OMB disseminates a study, analysis, or other information for public comment prior to disseminating the final OMB action or information product, requests for correction of information will be considered prior to disseminating the final OMB action or information product in those cases where OMB determines that: (1) an earlier response would not unduly delay dissemination of the OMB action or information product; and (2) the requestor has shown a reasonable likelihood of suffering actual harm from OMB's dissemination if OMB does not resolve the request for correction of information prior to dissemination of the final OMB action or information product.

### **Section III. Procedures for Requesting Reconsideration**

1. The following procedures are available to an affected person who has filed a covered request for correction of public information in accordance with Section II, above; who received notice from the Data Quality Coordinator of OMB's determination; and who believes that the Office of Management and Budget did not take appropriate corrective action. Requests determined by OMB to be not covered by the guidelines and requests determined to be frivolous will not be reconsidered under these provisions. These procedures apply to information disseminated by OMB on or after October 1, 2002, regardless of when information was first disseminated.

2. To request reconsideration, persons should clearly indicate that the communication is a "Request for Reconsideration;" should reference the OMB Information Quality Guidelines; and should include a copy of the request for correction previously submitted to OMB and OMB's response. Resubmission should be made to the Data Quality Coordinator by e-mail, fax or mail using the contact information in Section II, paragraph 1, above. Requests for Reconsideration must be submitted within thirty (30) days of the date of OMB's notification to the requester of the disposition of the underlying request for correction.

3. OMB's Executive Associate Director or a delegee thereof (typically in consultation with the Divisions within OMB responsible for the subject matter) will consider the request for reconsideration, applying the standards and procedures set out in Section II, above and will make a determination regarding the request. In most cases, the requestor will be notified of the determination and, if appropriate, the corrective action to be taken, within 60 days of receipt. If the request for reconsideration requires more than 60 days of receipt, OMB will inform the requestor of the extension, providing its reasons for the extension and an estimated decision date. OMB will give reasonable notice to affected persons of any corrections made.

#### **IV. Definitions**

1. "Affected" persons are those who may benefit or be harmed by the disseminated information. This includes both: (a) persons seeking to address information about themselves or about other persons to which they are related or associated; and (b) persons who use the information.

2. "Dissemination" means agency initiated or sponsored distribution of information to the public (see 5 CFR 1320.3(d) "Conduct or Sponsor"). Dissemination does not include the pass-through of public filings or other information received from third-parties by OMB and made available for public review through website posting or other means, without OMB's official endorsement of its content. However, these guidelines may apply to third-party information adopted by OMB.

In addition, dissemination does not include distributions of information or other materials that are:

- (a) intended for government employees or agency contractors or grantees;
- (b) intended for U.S. Government agencies;
- (c) produced in responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or similar law;
- (d) correspondence or other communication limited to individuals or to other persons, within the meaning of paragraph 7, below;
- (e) communications such as press releases, interviews, speeches, and similar statements containing information that OMB or another Federal agency has previously disseminated in compliance with the Government-wide Guidelines or the OMB guidelines; or
- (f) documents (e.g., guidance, bulletins, policy directives) intended only for inter-agency and intra-agency communications.

Also excluded from the definition are archival records; public filings; responses to subpoenas or compulsory document productions; or documents prepared and released in the context of adjudicative processes. These guidelines do not impose any additional requirements on OMB

during adjudicative proceedings involving specific parties and do not provide parties to such adjudicative proceedings any additional rights of challenge or appeal.

3. “Influential,” when used in the phrase “influential scientific, financial, or statistical information,” refers to disseminated information that OMB determines will have a clear and substantial impact on important public policies or important private sector decisions.

4. “Information,” for purposes of these guidelines, including the administrative mechanism described in Sections II and III, above, means any communication or representation of facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition does not include:

- (a) opinions, where the presentation makes clear that the statements are subjective opinions, rather than facts. Underlying information upon which the opinion is based may be subject to these guidelines only if that information is published by OMB;
- (b) information originated by, and attributed to, non-OMB sources, provided OMB does not expressly rely upon it. Examples include: non-U.S. Government information reported and duly attributed in materials prepared and disseminated by OMB; hyperlinks on OMB’s website to information that others disseminate; and reports of advisory committees published on OMB’s website;
- (c) statements related solely to the internal personnel rules and practices of OMB and other materials produced for OMB employees, contractors, agents or alumni;
- (d) descriptions of the agency, its responsibilities and its organizational components;
- (e) statements, the modification of which might cause harm to the national security, including harm to the national defense or foreign relations of the United States;
- (f) statements of Administration policy; however, any underlying information published by OMB upon which a statement is based may be subject to these guidelines;
- (g) testimony or comments of OMB officials before courts, administrative bodies, Congress, or the media, unless such testimony contains new, substantive information not previously disseminated; or
- (h) investigatory material compiled pursuant to U.S. law or for law enforcement purposes in the United States.

5. “Integrity” refers to the security of information -- protection of the information from unauthorized access or revision, to prevent the information from being compromised through corruption or falsification.

6. “Objectivity” is a measure of whether disseminated information is accurate, reliable, and unbiased and whether that information is presented in an accurate, clear, complete, and unbiased manner.

7. “Person” means an individual, partnership, association, corporation, business trust, or legal representative, an organized group of individuals, a regional, national, State, territorial, tribal, or local governmental entity, or a political subdivision of a State, territory, tribal, or local government or a branch of a political subdivision, or an international organization.

8. “Quality” is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer these four statutory terms, collectively, as “quality.”