



## Information Quality

### Federal Deposit Insurance Corporation Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated to the Public by the FDIC

#### Introduction

On September 28, 2001, the Office of Management and Budget (OMB) published guidelines in the *Federal Register* requiring federal agencies to develop procedures for reviewing and substantiating the quality of their information before it is disseminated to the public. OMB's quality guidelines for dissemination of information to the public were issued under Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554) and were revised and reissued on February 22, 2002. The guidelines require that each agency create a mechanism by which affected persons may seek, and obtain where appropriate, correction of information disseminated by the agency that does not comply with the agency's or OMB's guidelines. Starting in January 2004, agencies are required to submit an annual report to OMB detailing the number, nature, and resolution of any requests for a Section 515 correction.

#### Background

The Federal Deposit Insurance Corporation (FDIC) provides information including economic and statistical reports, research and staff studies, educational brochures, booklets, and pamphlets to a broad spectrum of individuals and organizations including the public. The FDIC is committed to following the suggested OMB guidelines and agrees with the underlying principles that the guidelines apply to a wide variety of government information dissemination activities ranging in importance and scope; that the guidelines are generic enough to fit all media whether printed, electronic or other form; and that they have the flexibility for the FDIC to incorporate any special data quality requirements for specific types of publications. Clearly, the more significant the information, the higher the quality standards to which it should be held, e.g., influential scientific, financial or statistical information.

The FDIC takes pride in the quality, objectivity, utility, and integrity of the information that it disseminates to the public. Before any information or data are released, the FDIC utilizes an established set of quality procedures to ensure accuracy and value.

#### Definitions

The definitions below are derived from the OMB guidelines published in the *Federal Register* on February 22, 2002 (67FR8459-8460).

Quality:	Quality is an encompassing term that includes objectivity, utility, and integrity. Therefore, the guidelines may refer to the above four terms, collectively, as "quality."
Objectivity:	Objectivity includes whether disseminated information is accurate, clear, complete, and unbiased both in presentation and substance. In a financial or statistical context, the original and supporting data shall be generated, and the analytic results shall be developed, using sound statistical and research methods.
Utility:	Utility refers to the usefulness of the information to the FDIC and to the public users.
Integrity:	Integrity refers to the security of the information, protection of the information from unauthorized access or revision, to ensure that the information has not been compromised in any manner.
Influential:	When used regarding financial or statistical information, influential means that the FDIC 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.
Reproducibility:	Reproducibility means that the statistical and financial data disseminated by the FDIC is capable of being substantially reproduced by an independent evaluator, subject to some

degree of imprecision.

Transparency: Transparency means that the sources, methods, procedures, references, and assumptions employed to create the information are provided.

### **FDIC Information Quality Guidelines**

The FDIC has created the following guidelines to promulgate its quality standards and formalize its correction mechanism. The FDIC will continue to disseminate information that meets the agency's high standards as confirmed by stringent internal review and approval processes. The Corporation is committed to integrating the principle of information quality into every step of its development of information, including its creation, collection, maintenance and dissemination. The policies and procedures that the FDIC currently has in place ensure, to the best of the Corporation's ability, that the quality of the information and data released to the public is accurate and appropriate and meets the FDIC's internal definitions of objectivity, utility, and integrity in accordance with the OMB guidelines.

The FDIC uses proven practices and standard review methods for ensuring quality and its key constituents: objectivity, utility, and integrity. The FDIC recognizes the need to address these constituents in unique ways.

*Objectivity* refers to the accuracy, reliability, and unbiased nature of the information. The FDIC's information products are presented in an unbiased, clear, complete and well-documented manner. The FDIC uses a variety of methods to achieve objectivity, utilizing both internal and external resources. It uses highly reliable review sources for corroboration and seeks public comment as appropriate. It also conducts specialized surveys and peer reviews using methodologies that are consistent with generally accepted industry standards for all aspects of survey design and implementation. The FDIC makes both original and supporting data and the source of the data available when appropriate. The Corporation's methods are transparent unless it must protect proprietary or confidential information. Transparency is achieved by referencing sources, identifying statistical methods employed, and utilizing sound research and analytical techniques.

The FDIC has several specialized committees that conduct cross-divisional reviews to ensure information currency and work together to modify or change some of the Corporation's major publications. Data provided to the FDIC for various outputs, including statistical releases and consumer education and guidance, are subjected to a variety of informational editing processes and levels of review.

*Utility* refers to the usefulness of information to its intended users. The FDIC seeks to ensure utility by regularly conducting structured reviews of key information output products to ensure they are current. The Corporation also continually seeks feedback from its target audiences to evaluate the utility of the products it disseminates. The FDIC strives to make its key information distributions available through its Web site in order to enhance the material's availability to the public. FDIC subject matter experts are actively involved in the banking and regulatory industry to ensure timeliness and value in the presentation of the Corporation's distributed products.

*Integrity* refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. Secure information systems are essential to providing high-quality information to the public and to protect critical systems and information. The FDIC has instituted a comprehensive set of policies, procedures, guidelines and controls for security.

### **FDIC Complaint and Appeals Process**

These guidelines permit persons to seek and, where warranted, obtain correction of non-compliant information or data disseminated by the FDIC.

If you believe that information disseminated by the FDIC does not comply with OMB or FDIC guidelines, you may seek correction of this information by submitting a "Section 515 Complaint" to the FDIC, in accordance with the procedure set forth in this section. These are known as Section 515 Complaints because the FDIC's data quality guidelines are issued pursuant to Section 515 of Public Law 106-554. The existence of the Section 515 procedure does not preclude you from contacting the FDIC by other methods to inquire about information disseminations or requesting corrections.

On occasion, the FDIC may disseminate a study, analysis, or other information prior to taking final agency action or issuing an information product. In such cases, the FDIC will consider a Section 515 Complaint relating to the study, analysis or other information only where: (1) the FDIC determines that a response in advance of the final agency

action or information product would not unduly delay issuance of the agency action or information product and; (2) you demonstrate a reasonable likelihood that you will suffer actual harm from the FDIC's dissemination if the FDIC does not resolve your complaint prior to the final agency action or information product.

By submitting a Section 515 complaint, the FDIC will track your complaint separately from other informal inquiries and you will have an appeal right if you disagree with the FDIC's initial response.

#### How to Submit a Section 515 Complaint with the FDIC

You may submit a Section 515 Complaint by mail, personal delivery, fax, or email to the FDIC using the following contact information:

Mailing Address: Section 515  
Federal Deposit Insurance Corporation  
Washington, DC 20429

Fax Number: (202) 416-2076

Email Address: [publicinfo@fdic.gov](mailto:publicinfo@fdic.gov)

In order to be considered a Section 515 Complaint by the FDIC, your request must:

- Contain a statement that you are submitting a complaint pursuant to "Section 515 of Public Law 106-554."
- Include your contact information:
  - Name and mailing address
  - Telephone number and email address, if available; and
  - The name of the organization you are affiliated with.
- Identify and describe the information or data that you seek to have corrected, including, for example, the number or title of the document(s) in which the information appears, the date of release, or the URL of the Web page on which the information was disseminated by the FDIC.
- Specify the reasons you believe the information or data is in error for failure to comply with the FDIC or OMB guidelines, provide a statement of what you believe the correct information or data to be, and state how you believe the data should be corrected. Where possible, state specific reasons and examples.
- Describe how the disseminated information affects you; i.e., the harm that has come to you or may reasonably be expected to come to you as a result of the information disseminated by FDIC.

The complainant has the responsibility of clearly presenting the basis for a Section 515 Complaint. As a preliminary matter, the FDIC may determine that your complaint does not meet the threshold requirements for processing. For example, the FDIC may decline to process complaints that do not contain sufficient information; or request correction of information not covered by the guidelines. The FDIC may also reject or deny Section 515 Complaints that do not contain the required information or are too general or vague for the FDIC to make a determination regarding the validity of the complaint. You may seek review of such determinations under the appeals process described below.

#### **Review of Section 515 Complaints by the FDIC**

Upon receipt of a properly filed Section 515 Complaint, the FDIC will carefully review the substance of your complaint and any supporting material and will consider whether any changes or corrections to the data are warranted. This review will be conducted by a representative from the FDIC Division or Office that generated or disseminated the information or data.

The FDIC will make a good faith effort to respond to complaints in writing within 60 calendar days of receipt. If your request requires more than 60 calendar days to resolve, the FDIC will advise you that more time is required, state the reason(s) more time is required and provide you with an estimated decision date. The format of the response will depend on the character and volume of requests. For example, if the FDIC receives numerous requests

concerning the same data or information, it may provide a response through a press release or on its Web site. Other requests may receive an individual response by letter, fax or email.

### **Complainant's Right to an Appeal**

If you are not satisfied with the FDIC's determination of your Section 515 Complaint, you may file a Section 515 Appeal with the FDIC in order to seek a final determination. In order to be considered by the FDIC, a Section 515 Appeal must be submitted as follows:

- The appeal must contain a statement that you are submitting an appeal pursuant to "Section 515 of Public Law 106-554."
- The appeal must be mailed, delivered in person, faxed, or emailed to the appropriate FDIC address.
- The appeal must be received by the FDIC within 30 calendar days of the date you received the determination you are appealing. The FDIC may consider an untimely appeal if it is accompanied by a request for leave to file an untimely appeal and the FDIC determines, in its discretion and for good and substantial cause shown, that the appeal should be considered.
- The appeal shall state reasons why the FDIC should reconsider its action, and relevant facts that, for good cause shown, were not previously presented to the FDIC.
- The FDIC will make a good faith effort to issue a final determination regarding an appeal within 60 calendar days of its receipt of the appeal. This time may be extended in appropriate circumstances. If your appeal requires more than 60 calendar days to resolve, the FDIC will advise you that more time is required, state the reason(s) more time is required and provide you with an estimated decision date. The format of the FDIC's final determination will depend on the character and volume of appeals filed. For example, if the FDIC receives numerous appeals concerning the same data or information, it may provide its final determination through a press release or on its Web site. In other cases, the FDIC may issue its final determination in the form of an individual response by letter, fax or email. The FDIC may reconsider a denial while an appeal is pending, if intervening circumstances or additional facts not known at the time of the denial come to attention of the FDIC. Appeals will be referred to the Division or Office Director for determination.

### **Privacy Statement**

The FDIC is authorized to collect the information you provide under Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001. It is needed to process complaints and appeals filed under these guidelines. The information you furnish is almost never used for any purpose other than to process and respond to your request. However, the FDIC may disclose information you provide (e.g., to a Congressional Office or to the Department of Justice) if authorized or required by Federal law, such as the Privacy Act.

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