



Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Federal Reserve Board

On February 22, 2002, the Office of Management and Budget (OMB) issued guidelines requiring federal agencies to develop procedures for reviewing and substantiating the quality of their information before it is disseminated to the public.¹ The guidelines also require that each agency create a mechanism by which affected persons may seek, and when appropriate obtain, correction of information that the agency disseminates and that does not comply with agency and OMB guidelines.

The Board of Governors of the Federal Reserve System (Board) provides information to a broad spectrum of individuals and organizations (such as, but not limited to, the Congress, other federal agencies, state and local governments, consumer and community groups, researchers and academics, financial institutions regulated by the Federal Reserve System, the media, and the general public), hereafter referred to as the public. This information covers an array of subjects with varying degrees of importance and impact on monetary and public policy and economic conditions.

Following are examples of information disseminated by the Board covered by the guidelines:

- Statistical releases
- Testimonies, speeches, and reports on various economic and banking topics, by staff designated to communicate official Board positions, simultaneously disseminated to the public
- Periodicals and journal articles on various economic and banking topics
- Research and staff studies initiated and sponsored by the Board
- Educational consumer brochures, booklets, and pamphlets

Following are examples of information disseminated by the Board not covered by the guidelines:

- Press releases (if the attached information was previously released to the public)
- Federal Reserve procedural manuals
- Research and staff studies not initiated and sponsored by the Board

The Board takes pride in the quality, objectivity, utility, and integrity of the information that it disseminates to the public. Before any information is released, it is thoroughly edited and reviewed. The Board has created these guidelines to

present its standards and to formalize its correction mechanism. It is the Board's intent to meet the information-quality standards set forth in these guidelines.

Effective date. These quality guidelines become effective October 1, 2002, and cover information disseminated on or after that date, regardless of when the information was first disseminated. Some previously disseminated information continues to be used for decision making or is relied upon by the agency and the public as official, authoritative government data; this information is, in effect, constantly being re-disseminated and is thus subject to the guidelines. Previously released information that does not meet these criteria is considered archived information and thus is not subject to these guidelines.

Definitions

These definitions are taken directly from the OMB guidelines, published in the *Federal Register* on February 22, 2002 (67 FR 8451-8460).

- *Quality* is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these terms collectively as "quality."
- *Objectivity* involves two distinct elements of disseminated information: (1) presentation -- that the information is presented in an accurate, clear, complete, and unbiased manner, and (2) substance -- that the information itself is accurate, reliable, and unbiased.
- *Utility* refers to the usefulness of the information to its intended users, including the public.
- *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 through corruption or falsification.
- *Influential*, when used in the phrase "influential scientific, financial, or statistical information," means that the Board can reasonably determine that dissemination of the information does have or will have a clear and substantial impact on important public policies or important private-sector decisions.
- *Reproducibility* means that the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. For data deemed by the Board to be "influential" (as defined above), the degree of imprecision is lower than for data deemed non-influential.
- *Transparency* requires the Board to disclose specific data sources that have been used and the specific quantitative methods and assumptions that have been employed in order for an independent re-analysis to be undertaken.

Board Guidelines

The Board will continue to disseminate information that meets the agency's already highly rigorous internal review and approval process. The Board's current policies and procedures ensure that the Board, to the best of its ability, releases to the public information and data that are accurate and timely, appropriate for external consumption, uncompromised, and useful to the public. While covering a broad range of information, these guidelines focus mainly on the statistical and financial data and information that the Board disseminates.

Objectivity

In meeting the requirement for objectivity, the Board verifies that the substance of the information disseminated is accurate, reliable, and unbiased and that the presentation is accurate, clear, complete, and unbiased. To verify the substance, the Board uses reliable sources, including, but not limited to, data reported to the Board and maintained in its databases, information obtained from other agencies and outside sources, and data gathered by preapproved survey organizations (acting as agents for the Board). All original and supporting data are generated, and the analytic results are developed, using sound statistical and research methods. In addition, the Board will demonstrate in all forthcoming Paperwork Reduction Act (PRA) packages submitted to OMB that each information collection subject to the PRA will be collected, maintained, and used in a manner consistent with OMB and Board guidelines.

Data reported to the Board by regulated entities. The data reported to the Board and used by its staff for various products (for example, statistical releases, reports to the Congress, and consumer pamphlets) are subjected to a variety of microdata and macrodata edit checks specific to each information collection. After the data have been edited and before they are disseminated, they are thoroughly reviewed for accuracy and validity by content experts within the Board. During the review, the staff contacts data providers if there are questions about or inconsistencies in the data provided. As a result of this review, data may be revised. Some data, such as those pertaining to the Home Mortgage Disclosure Act and the Community Reinvestment Act, may be revised as a result of questions raised during a compliance exam. To facilitate the receipt of the most accurate and consistent data, the Board includes definitions and examples as part of the instructions for most reporting forms. These help the data providers to better understand the exact information that should be included in certain items and calculations.

Federal Financial Institutions Examination Council (FFIEC) data. The FFIEC is a formal interagency body empowered to prescribe uniform principles, standards, and report forms for the federal examination of financial institutions by the Board, the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS) and to make recommendations to promote uniformity in the supervision of financial institutions. The member agencies require their regulated entities to report certain data to the agencies. Although information derived from these data are disseminated under the umbrella of the FFIEC, the agencies are ultimately responsible for their entities' disseminated information. Any complaints about such information should be directed to the appropriate agency.

Information obtained from other agencies. The Board receives a variety of structural and financial data from other agencies, including the FDIC, OTS, NCUA, Bureau of Labor Statistics, and Census Bureau. Data received from other agencies are reviewed for completeness of the microdata and the universe of reporters. In general, the data are associated with internal identifiers and are stored with data collected by the Federal Reserve System. Data are edited on microdata and macrodata levels at the collecting agency. For some series, Board staff performs some data-quality edits besides those performed at the other agency. Macrodata received from other agencies are edited and reviewed by the originating agencies.

Data gathered through surveys. Survey respondents are selected with probability sampling techniques, including stratified random sampling. To construct estimates of the universe, data from respondents are assigned weights based on the inverse of the probability of selection, adjusted by regression on covariates, as appropriate. Some survey data are collected for the Board by commercial survey-research centers. The sampling techniques used by these centers may be slightly different.

Information obtained from commenters on a rulemaking. On occasion, the Board has received information from commenters to a rulemaking published in the *Federal Register* and used the information obtained as the basis for revising the information collection as published. If the Board decided to rely on the submitted information, that information would be verified for accuracy and determined to meet the appropriate quality standards before use or dissemination.

Information subject to peer review. Because its staff is relatively small, the Board currently uses its Resident Scholar Program in lieu of a formal peer review to analyze staff papers and potential journal articles. This program brings noted professionals and experts to the Board to review staff papers and journal articles, interact with the staff, discuss measurement issues, and ultimately provide feedback to Board staff.

Utility

In meeting the requirement of utility, pursuant to the PRA of 1995 and implementing regulations (44 USC ch. 5; 5 CFR 1320, appendix A.1), the Board reviews all collections of information obtained from the public at a minimum of every three years. This review requires the Board to allow for public comment on an information collection under review and justify the ongoing need for the data, including whether the analysis and output from the data are still of value to the Board and the public. If any information collection is outdated (for example, because of changes in the economy or in monetary policy), the Board either discontinues the use of the data or modifies the information requirements. To further help the public understand and use the Board's data products, its public web site (www.federalreserve.gov) has a [Contact Us](#) e-mail link by which the public can submit questions to content experts.

The Board has editorial, design, and document standards for all information that is released to the public, in whatever medium. To facilitate the use of the information disseminated, standard formats for certain statistical and informational releases have been developed under the aegis of the Publications Committee.

Integrity

The Board has implemented an information security architecture according to Federal Reserve System standards to protect its information assets from loss or misuse. Information security policies and safeguards have been instituted to protect information assets from the threats of unauthorized access, modification, destruction, or disclosure. The Board has implemented specific technologies, including virus-detection systems, to secure its internal networks from external attacks. Additionally, the Board has implemented tools that limit access to data to specific individuals. An intrusion-detection system continuously monitors the Board's network and flags possible unauthorized access. Servers housing the data use specialized software that determines if an unauthorized modification has taken

place. Finally, change-control procedures are used to ensure that additions, deletions, and modifications to the applications take place correctly and as intended.

Influential Information, Reproducibility Standards, and Transparency Requirements

The Board has determined that the agency's principal federal economic indicators are considered to be "influential in nature" (see definition of "influential" above). Therefore, these data are subject to the reproducibility and transparency requirements set forth in the OMB guidelines. OMB's Statistical Policy Directive No. 3 requires a performance evaluation of each indicator every three years. This evaluation addresses the accuracy and reliability of the series and the accuracy and completeness of the documentation describing the methods used in compiling and revising the indicator.

As part of its information-dissemination guidelines, the Board provides the public with all statistical methods employed in the creation of any statistical or analytical financial data. The original and supporting data and the source of the data are available on request, so long as the data are not deemed confidential.² For information that is confidential and therefore cannot be released to the public, the review procedures and edit verifications are available upon request. Otherwise, the methods and underlying data are available on the Board's public web site (with the document in question) or as an attachment to any influential document distributed in print.

[Filing a Correction Request](#)

Footnote

1. The OMB guidelines were issued pursuant to the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554, section 515).[Return to text](#)

2. Pursuant to the Freedom of Information Act (5 USC 552).[Return to text](#)

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