

# NATIONAL LABOR RELATIONS BOARD

## Information Quality Guidelines

1. **Purpose.** The National Labor Relations Board (NLRB or the Board) issues these Information Quality Guidelines to describe the agency's procedures for ensuring the quality of information that it disseminates to the public and to set forth the administrative procedure by which an affected person may obtain correction of disseminated information that does not comply with the Guidelines. The purpose of the Guidelines is to ensure that information disseminated by the NLRB is: (1) presented in an accurate, clear, complete, and unbiased manner; (2) useful to the intended users; and (3) protected from unauthorized access or revision.

2. **Authority.** Section 515 of the Treasury and General Government Appropriations Act for FY 2001 (Public Law No. 106-554) requires each Federal agency to publish guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information that it disseminates to the public. Each agency's guidelines must conform to government-wide guidelines issued by the Office of Management and Budget (OMB). After seeking comment on proposed government-wide guidelines, OMB published initial guidelines (with certain provisions published on an interim final basis) in the Federal Register on September 28, 2001 (66 FR 49718) and final guidelines on February 22, 2002 (67 FR 8452).

3. **Effective Date.** October 1, 2002.

4. **Agency Background.** The NLRB is an independent administrative agency created by Congress in 1935 to administer the National Labor Relations Act (NLRA), which is the primary Federal statute governing labor relations in the private sector. The Act defines and protects the rights of employees, unions and employers, and seeks to eliminate certain unfair labor practices on the part of employers and unions so as to promote commerce and strengthen the Nation's economy. Under the NLRA, the NLRB has two primary functions: (1) to prevent and remedy statutorily defined unfair labor practices, and (2) to conduct secret-ballot elections among employees to determine whether the employees wish to be represented by a union. The NLRB consists of two major components. A five-member Board appointed by the President acts primarily as a quasi-judicial body in deciding cases on the basis of formal records in administrative proceedings. The General Counsel, also appointed by the President, has final authority to investigate unfair labor practice charges, issue complaints, and prosecute such complaints before administrative law judges and the Board. On behalf of the Board, the General Counsel also prosecutes injunction proceedings, handles court of appeals proceedings to enforce or review Board decisions and orders, and secures compliance with Board orders and court judgments.

5. **Definitions.** For purposes of the NLRB's information quality assurance guidelines, the following terms will have the meanings below. These definitions follow or are derived from OMB's guidelines. Consistent with OMB's guidelines, we have adapted OMB's definitions in ways appropriate to the NLRB's particular practices and programs. **Dissemination** means an NLRB-initiated or sponsored distribution of information to the public. Dissemination does not include distributions intended to be limited to: (i) government employees or agency contractors or grantees; (ii) intra- or inter-agency use or sharing of government information; or (iii) responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar laws. Dissemination further does not include distributions limited to: correspondence with individuals or persons, press releases, archival records, subpoenas or adjudicative processes. In addition, dissemination does not include procedural, operational, policy, and internal manuals prepared for the management and operations of the NLRB that are not primarily intended for public dissemination.

**Information** means any communication or representation of knowledge, such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. "Information" includes data posted on the NLRB's Web site, but does not include the provision of hyperlinks to information that others disseminate. "Information" also does not include personal opinions, where the NLRB or the author makes clear that what is being offered is the author's opinion rather than either fact or the NLRB's views.

**Influential** is a specialized term that means certain scientific, financial or statistical information that the agency can reasonably determine will have or does have a clear and substantial impact on important public policies or important private sector decisions. Consistent with the scope of these guidelines, the term "influential" applies only to certain scientific, financial or statistical information and does not apply to policy decisions that the information may support. If a decision or action by the NLRB is itself very important, a particular piece of

information supporting that decision or action may or may not be "influential." In rulemaking, influential information is scientific, financial or statistical information that the NLRB considers significant with respect to one or more critical issues in a "major rule," as such term is defined in the Small Business Regulatory Enforcement Fairness Act of 1996. In non-rulemaking contexts, the scope and significance of the effect of the information on important public policies or important private sector decisions will determine whether the information is influential.

**Integrity** refers to the security of the NLRB's information, i.e., protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

**Objectivity** refers both to: (i) presenting information in a proper context to set out that information in a clear, complete and unbiased manner; and (ii) ensuring that the substance of the information is accurate, reliable and unbiased.

**Quality** is an encompassing term comprising utility, objectivity and integrity.

**Reproducibility** means that "influential" information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. With respect to analytic results, "capable of being substantially reproduced" means 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.

**Utility** refers to the relative usefulness of the information to its intended users.

## Information Quality Assurance Guidelines

In accordance with OMB's guidelines, the level of quality assurance appropriate for information will vary according to the relative importance of the information and the costs and benefits of requiring additional assurances for the particular information. The NLRB has created the following guidelines to describe its quality standards and formalize a correction mechanism.

### Basic Principles

**Quality.** The NLRB takes pride in the quality of its information and is committed to disseminating information that meets the NLRB's already rigorous standards for objectivity, integrity and utility. Before the NLRB disseminates any information to the public, it is thoroughly reviewed by expert staff and appropriate levels of management. The NLRB's current internal review and approval policies and procedures ensure, to the best of the NLRB's ability, that the NLRB's disseminated information and data are accurate and timely, appropriate for external consumption, uncompromised and useful to the public. The NLRB will also apply the OMB and NLRB information quality guidelines to the collection and use of information under any Paperwork Reduction Act (PRA) clearance submissions to OMB.

**Integrity.** The NLRB's Information Technology Branch has established policies for carrying out the NLRB's information security program pursuant to the Computer Security Act of 1987, the Government Information Security Reform Act of 2000 and the Security of Federal Automated Information Resources, OMB Circular A-130 (February 8, 1996). The NLRB's information security program encompasses those measures necessary to protect the NLRB's information resources. These measures include providing, for each IT project: (i) the appropriate technical, personnel, physical, administrative, environmental and telecommunications safeguards; and (ii) continuity of operations through contingency or disaster recovery plans. The protective measures cover the following information resources: data, applications, software, hardware, physical facilities and telecommunications. The NLRB's information security program assures that each automated information system has a level of security that is commensurate with the risk and magnitude of the harm that could result from the loss, misuse, unauthorized disclosure or improper modification of the information contained in the system.

**Utility.** The NLRB evaluates and determines the audience for whom the information to be disseminated is intended and will benefit. The NLRB is committed to maximizing the utility of the information it disseminates to the public. To this end, information and the appropriate form and vehicle for its dissemination are evaluated and reviewed by the relevant subject matter experts on a given project, along with appropriate levels of management within the NLRB, before the information is disseminated to ensure its usefulness to the intended audience. This includes ensuring that the information is organized and written in a manner that facilitates its understanding and use by the intended audience. The information also is reviewed to ensure its timeliness and continuing relevance

for the intended audience.

**Objectivity.** The NLRB is committed to disseminating information that is accurate, clear, complete and unbiased both in its content and in its presentation. The relevant subject matter experts and appropriate levels of management review information before it is disseminated, among other things, to evaluate whether the information is accurate, reliable and unbiased, including an assessment of collection, generation, and analysis of relevant information and data. The review also considers the presentation of the information to ensure that it is put in the proper context and presented in a clear, complete and unbiased manner. Where appropriate, in the context of certain rulemakings for example, the NLRB also identifies the sources of supporting data so that the public can assess for itself the objectivity of those sources.

**Influential Information.** Any information deemed to be "influential" as defined in these guidelines will be reviewed by subject matter experts within the NLRB and appropriate levels of management to ensure adequate disclosure about underlying data and methods of analysis to facilitate reproducibility of the information by qualified third parties.

## General Categories of Information Subject to the Guidelines

- **Reports on Board Activities.** The Information Guidelines apply to general information about the NLRB, whether it appears on the Agency's Web site, in written materials, or other forms of communication. The Guidelines apply to the following:

Annual Report of the NLRB that highlights operations, decisions, and statistical data for each fiscal year.

Monthly Election Report that lists the results of employees' secret-ballot voting in NLRB-conducted representation cases. This compilation is arranged by union, with employer name and location.

Weekly Summary of NLRB Cases that provides a synopsis of NLRB cases and documents.

- **Information Disseminated through the Rulemaking Process -- With Notice and Comment.** The NLRB rarely engages in rulemaking. Before the NLRB disseminates a proposed or final rule, expert staff prepare drafts of the rule, that, when appropriate, are circulated to other staff members having direct or complementary subject matter expertise and finally are reviewed and approved by the General Counsel and/or the Board or Executive Secretary of the Board. The Agency's infrequent proposed rulemakings generally include a public comment process pursuant to the Administrative Procedure Act ("APA"). These procedural safeguards should assure a response to comments on the quality of information in the proposed rule and provide affected parties an opportunity to contest the final decision. The NLRB normally will review any correction request about a pending rulemaking through the notice and comment process and not through the correction request procedures described below. However, as described below in the "Requests for Correction" section, if an individual or entity can show that an earlier response would not unduly delay the NLRB and would avoid the potential for actual harm, the NLRB will attempt to resolve the information quality complaint before the final Agency action.
- **Other NLRB Publications.** The Information Guidelines apply to publications such as "The NLRB--What it is, What it does," "Basic Guide to the National Labor Relations Act," "The NLRB and You--Representation Cases," "The NLRB and You--Unfair Labor Practices," and "Your Government Conducts an Election".

## Information Outside the Scope of the Guidelines

Based on OMB's definitions of "dissemination" and "information," several types of information disseminated by the NLRB and members of the NLRB staff do not fall under these guidelines. Excluded categories include:

- Distributions intended to be limited to NLRB employees or contractors, such as internal operating procedures, training manuals and requests for proposals.
- Disseminations intended to be limited to intra- or inter-agency sharing of government information, such as the NLRB's annual budget and the NLRB's plans and reports pursuant to the Government Performance and Results Act of 1993.

- Opinions of individual Board and staff members, where the author's presentation states that the information is that person's opinion rather than fact or the NLRB's views. These include articles, speeches, panel presentations, special studies and academic papers authored by staff members that state that the views expressed in their work are their own views and do not necessarily reflect the views of the NLRB.
- Responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar laws.
- Correspondence with individual entities or persons.
- NLRB press releases, where substantive facts have been disseminated elsewhere.
- Archival records maintained by the NLRB.
- Information from third parties, for which the NLRB is merely a conduit, and public comment letters.
- Distributions intended to be limited to subpoenas or adjudicative processes, including NLRB orders, opinions, amicus and other briefs. Adjudicative processes also include factual allegations by the staff during the investigative and trial phases of cases. Due to well-established procedural safeguards and rights to address the quality of factual allegations and adjudicatory decisions, as well as opportunities to appeal decisions, these guidelines do not provide parties to such adjudicative proceedings additional procedural rights of challenge or appeal.

It should be noted that the intra- or inter-agency government document distributions listed above are documents that would not normally be disseminated to the general public, but would be provided to a requestor in response to an individual request. Some are posted to the NLRB Web site as a matter of convenience for potential requestors rather than for purposes of dissemination to the public in general. The Agency, therefore, has determined that such documents are not information dissemination products to which these Guidelines apply, and the administrative procedure for requests for correction of information set forth in below are not applicable to such documents. It should be noted, however, that these documents are subject to quality control procedures that are at least as stringent as those applied to the information dissemination products that are covered by these Guidelines. In fact, most documents of this kind are not only prepared by subject matter experts and reviewed by NLRB office directors, but also must be approved by the General Counsel, the Chairman or the full Board, as appropriate, prior to their submission or publication. Documents of this kind also are subject to existing procedures for review, generally by Congress and/or OMB, and any needed corrections to information contained in such documents are made through those existing procedures.

## Requests for Correction

The correction process is designed to provide a mechanism for affected persons to seek correction of information disseminated by the NLRB that does not comply with the NLRB's or OMB's information quality guidelines. The definition of "affected person" in the previous sentence is an individual or an entity that may use, benefit, or be harmed by the disseminated information at issue. These guidelines are applicable to information that the NLRB disseminates on or after October 1, 2002, whether or not the information was previously disseminated.

This process does not necessarily guarantee a correction in every instance. Rather, the decision of whether a correction is appropriate, and what degree of correction is appropriate, will be determined by the nature, completeness and timeliness of the information involved and such factors as the significance of the correction on the users of the information and the magnitude of the correction. Responses may be in the form of personal contacts by letter or telephone, form letters, press releases or mass mailings that correct widely disseminated errors or address a frequently raised request. With respect to proposed rules, the thorough consideration required by the APA process normally should provide an adequate complaint and appeal process. Accordingly, the notice and comment process is the presumptive means by which an affected person may address the quality of data in a proposed rulemaking. If a final rule incorporates new facts or data that were not available for public comment in connection with the proposed rule, these new facts or data will be addressed through this correction request process.

In cases where the Agency disseminates a study, analysis, or other information prior to the final Agency action or

information product publication, requests for correction will be considered in those cases where the Agency has determined that: 1) a response would not unduly delay issuance of the Agency action or information product, and 2) the complainant has shown a reasonable likelihood of suffering actual harm from the Agency's dissemination if the Agency does not resolve the complaint prior to the final Agency action or information product dissemination.

The NLRB's Director, Division of Information, is the initial point of contact for correction requests, and that Office will refer matters to be resolved to the appropriate division or office within the NLRB. If the matter is resolved at the division/office level, the staff will use reasonable efforts to send its response to the requestor within 60 days of the date the office or division received the request. If the resolution of the matter is particularly complicated or would benefit from consultation with other divisions or agencies, the NLRB will inform the requestor that more time is required, and indicate the reason why and an estimated decision date.

**Request Format.** To be treated as a data quality correction request under these guidelines, any affected person seeking correction of NLRB-disseminated data should submit a request in writing (letter, fax or by e-mail) and include the following:

- A description of the facts or data the requestor seeks to have corrected;
- An explanation of how the requestor is an affected person with regard to those facts or data;
- The factual basis for believing the facts or data need to be corrected for failure to comply with OMB or NLRB standards;
- A proposed resolution, including the factual basis for believing the facts or data in the requestor's proposed resolution are correct;
- The consequences of not implementing the proposed resolution; and
- The requestor's contact information, including name, address, daytime telephone and fax numbers and e-mail address.

Requests should be marked "Data Quality Correction Request " on the first line of the envelope directly above the mailing address and on the correspondence itself, in the case of letters, or in the "Subject" line, in the case of e-mail correspondence. E-mail correspondence should be sent to the following address: [dataquality@NLRB.gov](mailto:dataquality@NLRB.gov). Letters should be addressed to:

NLRB  
Director, Division of Information  
Attn: Data Quality  
1099 14th Street, NW  
Washington, DC 20570

**Processing Data Quality Correction Requests.** The Director, Division of Information, will, if necessary, route the request to the head of the appropriate division or office within the NLRB who will, in turn, ensure that: (i) the request is reviewed; (ii) any appropriate corrective action is taken; and (iii) a response to the request is made.

The NLRB will normally respond to requests for correction of information within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, the NLRB will inform the requestor that more time is required, and indicate the reason why and an estimated decision date.

**Requests for Reconsideration.** If the requestor does not agree with the response, the requestor may send a request for a reconsideration of the response. The reconsideration request must be postmarked (or, in the case of e-mail, date-stamped) within 30 calendar days of the date that the NLRB transmitted its decision on the original request for correction. Requests for reconsideration that are received by the NLRB after the 30-calendar day deadline may be denied as untimely. The request for reconsideration should include a copy of the original request, a copy of the original response (if in writing) or a summary of the response (if oral), and the following:

- A statement describing why the response to the original complaint did not comply with the data quality

guidelines or why the requestor disagrees with the original response; and

- The requestor's contact information, including name, address, daytime telephone number and email address.

Reconsideration requests should be marked "Request for Reconsideration of Data Quality Correction " on the first line of the envelope directly above the mailing address and on the correspondence itself, in the case of letters, or in the "Subject" line, in the case of e-mail correspondence. E-mails should be sent to the following address: dataquality@NLRB.gov. Letters should be addressed to:

NLRB  
Director, Division of Information  
Attn: Data Quality  
1099 14th Street, NW  
Washington, DC 20570

**Processing Reconsideration Requests.** The Director, Division of Information, will route the reconsideration request to the Deputy General Counsel or the Executive Secretary, depending on whether the division or office that processed the original request is under the Board or General Counsel. The Deputy General Counsel or Executive Secretary may decide the matter themselves, or designate another official to render a decision on the request. The Deputy General Counsel, the Executive Secretary, or the designated official will review the original response, determine if additional action is appropriate, and use reasonable efforts to send a response to the reconsideration request within 30 days of its receipt by the Director of the Division of Information. If the reconsideration request requires more than 30 days to resolve, the NLRB will inform the requestor that more time is required, and indicate the reason why and an estimated decision date.

## Reporting Requirement

The NLRB is required to provide an annual fiscal year report to OMB, beginning January 1, 2004, providing information on the number, nature, and resolution of complaints received by the Agency concerning compliance with OMB or Agency Information Quality guidelines.

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## Appendix A

This is the Office of Inspector General's (OIG) submission for the Agency's information quality guidelines for information disseminated to the public. Pursuant to the Inspector General Act, 5 U.S.C. App.(as amended), the OIG is a statutorily independent component of the Agency with responsibility to investigate and report waste, fraud and abuse in the Agency's programs and operations. Applying Agency-wide guidelines to the OIG would undermine the OIG's independence by having another office in the Agency review the methodology and preparation of the OIG's work. In addition, an Inspector General shall be under the "general supervision" of the agency head or the officer next in rank below the agency head, "but shall not report to, or be subject to supervision by, any other officer of such establishment." Inspector General Act, § 3(a).

The conflict between the Agency-wide guidelines and the Inspector General Act can be resolved by the development and issuance of OIG information quality guidelines in accordance with Section 515 of PL 106-554 that will provide comparable assurances and procedures to the public. The guidelines set forth below will apply to OIG audit and inspection reports that are posted on the OIG's Web site. The guidelines will not apply to reports of investigation of employee misconduct or illegal activity that are submitted to Federal or State prosecutors for purposes of criminal prosecution or to the Agency for purposes of administrative discipline. These guidelines will also not apply to memoranda of law, or other legal advice, prepared by the OIG Counsel to assist OIG components in the performance of their responsibilities. The guidelines are intended to ensure accuracy in OIG reports disseminated to the public. The steps described below reflect the OIG normal practice and may vary to some degree from one review to another. This description does not confer any rights upon a subject or witness of an OIG investigation to a pre-issuance review, which is reserved to the Inspector General's discretion and judgment. The remedies provided in these guidelines are limited to that which is set forth below.

## OIG QUALITY GUIDELINES

### Oversight Management Responsibility

The Counsel to the Inspector General will be responsible for overall implementation and oversight of information quality guidelines for the OIG. The Counsel to the Inspector General will be responsible for receiving and responding to requests for corrections and for producing the annual report to OMB regarding complaints and how they were addressed. The Inspector General will be responsible for considering and responding to requests for reconsideration of requests for corrections.

### Standards for Disseminated Information

The OIG has adopted standards of quality that assure utility, objectivity, and integrity based on the OMB guidelines published in the Federal Register on September 28, 2001 (66FR 49718) and on February 22, 2002 (67FR 8452). In addition, statistical information disseminated by the OIG is based on sound statistical methods and the principle of transparency. Finally, influential information is subject to an added level of scrutiny.

For purposes of these guidelines, the following definitions apply:

*Utility* means that the information to be disseminated is useful to its intended users including the public.

*Objectivity* means that disseminated information is substantively accurate, reliable, and unbiased, and presented in a clear, complete, and unbiased manner.

*Integrity* means that information is protected from unauthorized access, corruption, or revision to ensure that disseminated information is not compromised through corruption or falsification.

*Sound statistical methods* means that methods are used to produce information that is accurate, reliable, and unbiased.

*Transparency* refers to a clear description of the methods, data sources, assumptions, outcomes, and related information that will allow the data user to understand how the information produced was designed or produced.

*Influential information* means information that is expected to have a clear and substantial impact at the national level on major public or private policy decisions.

### Application of Standards of Quality by the OIG

#### OIG Audits

The OIG Audit staff is responsible for independent audits of Agency programs as well as audits of entities doing business with the Agency. Audits of Agency programs and operations are posted on the OIG part of the Agency's Web site.

The OIG has standards and review procedures in place that assure that information disseminated to the public is reviewed for objectivity, utility, integrity, the use of sound statistical methods, and transparency of methods, sources, assumptions, and outcomes.

The OIG adheres to the *Government Auditing Standards*, issued by the Comptroller General of the United States (the Yellow Book), and the *Inspector General Manual* (IG Manual). The Yellow Book prescribes generally accepted government auditing standards and the IG Manual establishes the policies and procedures to be followed by the Audit staff, including the supervisory review of audit working papers and reports and the independent referencing of significant audit reports prior to issuance. Further, the OIG audit process undergoes both management and peer reviews on a recurring basis.

In addition to these standards, each audit is subject to extensive review within the OIG. Also, a copy of each audit report is provided in draft to the Agency component that was the subject of the audit for review and comment prior to final dissemination. The audited entity's comments are published in the final report.

Prior to posting on the Agency's Web site, the report is reviewed by the Counsel to assure compliance with the Privacy Act and any other applicable statute or regulation.

### Inspection Reports

The inspections provide an alternative mechanism to traditional audits and investigations to review Agency programs and activities. Inspection reports are posted on the Agency's Web site.

In accord with the intent of PL 106-554, the inspection process follows guidelines ensuring that the information in inspection reports is objective, useful, and based on sound evaluation principles, including the proper use of statistical methods. Inspection reports also list sources, assumptions, and outcomes.

The OIG follows the Quality Standards for Inspections promulgated by the President's Council on Integrity and Efficiency, issued in March 1993. These guidelines, referred to as the "Blue Book," address 12 major standards for ensuring quality work: Qualifications, Independence, Due Professional Care, Quality Control, Planning, Data Collection and Analysis, Evidence, Supporting Documentation, Timeliness, Fraud and Other Illegal Acts, Reporting, and Follow-up.

In addition to these standards and procedures, each report undergoes extensive review within the OIG. Also, a draft of the report is provided to the component that is the subject of the review for comment prior to final publication. The component's comments are incorporated into the final report.

Prior to posting on the Agency's Web site, the report is reviewed by the Counsel to assure compliance with the Privacy Act and any other applicable statute or regulation.

### Information Correction Request and Appeal Process

Submitting a Formal Request for Correction. All requests for correction of OIG information must be submitted by letter, fax, or e-mail to the OIG. Requests for correction should include the following information:

- A statement that the request for correction of information is submitted under the OIG's Information Quality Guidelines.
- An explanation of how the requestor is an affected person with regard to those facts or data.
- Requestor contact information, including 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 be corrected, including the name of the OIG report or data product, the date of issuance or other identifying information such as the URL of the web pages, and a detailed description that clearly identifies the specific information contained in that report or data product for which a correction is being sought.
- Explanation of noncompliance with OMB and/or OIG Information Quality Guidelines. This should include an explanation that describes how information fails to meet either the OMB or OIG Information Quality Guidelines.
- Explanation of the effect of the alleged error. An explanation that describes how the alleged error harms the requestor or how a correction would benefit the requestor.
- Recommendation and justification for how the information should be corrected. An explanation that gives the requestor's specific recommendations for how the information should be corrected and that describes the requestor's position as to why the OIG should adopt those recommendations.

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

Requestors should be aware that they bear the "burden of proof" with respect to the necessity for correction as well as with respect to the type of correction they seek. The OIG will base its decision on the merits of the information provided by the requestor and will not attempt to contact the requestor to obtain additional information when the submission by the requestor is incomplete.

Requests should be marked "Data Quality Correction Request " on the first line of the envelope directly above the mailing address and on the correspondence itself, in the case of letters, or in the "Subject" line, in the case of e-mail correspondence. E-mail correspondence should be sent to the following address: [OIGHotline@NLRB.gov](mailto:OIGHotline@NLRB.gov). Letters should be addressed to:

NLRB  
Office of Inspector General  
Attn: Data Quality  
1099 14th Street, NW  
Washington, DC 20570

#### OIG Review of the Request for Correction

The request for correction will be processed by the Counsel to the Inspector General. These guidelines apply to all applicable information the OIG disseminates on or after October 1, 2002, regardless of when the information was first disseminated. Based on the explanation and evidence submitted with the request for correction, the OIG audit staff will conduct a 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 OIG's Information Quality Guidelines. The audit staff will submit its response to the request for correction to the Counsel. After a review of the request for correction and the response, the Counsel will determine whether a correction is warranted, and, if so, what corrective action it will take.

Corrective action will be determined by the nature and timeliness of the information involved and such factors as the significance of the error on the use of the information and the magnitude of the error. The OIG is not required to change, or in any way alter, the content or status of information based only on the receipt of a request for correction.

The OIG need not respond substantively to frivolous or repetitive requests for correction. Nor does the OIG have to respond substantively to requests that concern information not covered by the guidelines or from a person whom the information does not affect.

#### OIG Response to the Request for Correction

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

The OIG will normally respond to requests for correction of information within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, the OIG will inform the requestor that more time is required, and indicate the reason why and an estimated decision date.

#### Request for Reconsideration of OIG's Decision

If the requestor disagrees with the OIG's denial of the request or with the corrective action the OIG intends to take, the requestor may file a request for reconsideration with the Inspector General (Reconsideration Official). Persons desiring to file a request for reconsideration should submit the request by letter, fax, or e-mail. Persons requesting reconsideration should also 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 the OIG (postmarked or shipped by an overnight delivery service) within 30 calendar days of the date that the OIG transmitted its decision on the original request for correction. Requests for reconsideration that are received by the OIG after the 30-calendar day deadline will be denied as untimely.

Requests should be marked "Data Quality Correction Request--Reconsideration " on the first line of the envelope directly above the mailing address and on the correspondence itself, in the case of letters, or in the "Subject" line, in the case of e-mail correspondence. E-mail correspondence should be sent to the following address: OIGHotline@NLRB.gov. Letters should be addressed to:

NLRB  
Office of Inspector General  
Attn: Data Quality  
1099 14th Street, NW  
Washington, DC 20570

#### OIG Review and Response to the Request for Reconsideration

The Inspector General will review the information in question and the material submitted in support of the request for reconsideration, the material submitted with the original request for correction, and the OIG' response to that request. The Inspector General will then arrive at a decision regarding the request for reconsideration.

After the Inspector General has made a decision on the request for reconsideration, the OIG will respond to the requestor by letter, e-mail, or fax. The response will explain the Inspector General's decision and the action the OIG will take (if any) in response to the request for reconsideration.

The OIG will respond to all requests for reconsideration within 30-calendar days of receipt.

#### Annual Report

Beginning on January 1, 2004, the OIG will submit a report to the Office of Management and Budget on the number and nature of complaints received by the OIG regarding its compliance with Sec. 515 of Public Law 106-554 and how those complaints were resolved.



September 27, 2002