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Record Type: Record

To: Brooke Dickson Information Quality/OMB/EOP@EOP
cc:
Subject: USAID Comments - Data Quality Guidelines

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To: Brooke Dickson/OMB/EOP@EOP
cc: "Benedict, Peter" <PBenedict@usaid.gov>, "White, Lee"
<LeeWhite@usaid.gov>, "Fredericks, Joseph" <JFredericks@usaid.gov>
Subject: USAID Comments - Data Quality Guidelines

Brooke,
Thank you for coming to USAID on Tuesday, August 7, 2001, to meet with members of USAID staff who have significant responsibilities for the dissemination of USAID information to the public. The information you provided about the history and intent of Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 gave us a clearer understanding of the law.
OMB Question: Have the proposed guidelines struck the appropriate balance? How could they be improved?
USAID Response: As discussed in the meeting, we recommend defining "Affected Persons" in order to clarify the scope of the guidelines and to strike an appropriate balance. We suggest the following:
"Affected Persons" - a person or group of

people who are sufficiently affected by the matter at hand and who, if the administrative mechanism is used, will be relieved of an immediate negative impact or direct injury. There are three requirements for qualifying as an Affected Person:

(1) injury in fact, which means an immediate negative impact that is (a) concrete and particularized, and (b) actual or imminent, not conjectural or hypothetical;

(2) a causal relationship between the immediate negative impact and the challenged information, which means that the immediate negative impact can be traced to the challenged information of the agency, and has not resulted from the independent action of some third party; and

(3) a likelihood that the immediate negative impact will be redressed by a favorable decision, which means that the prospect of obtaining relief from the challenged information as a result of a favorable ruling is not too speculative. The party invoking administrative

mechanism bears the burden of establishing each of these elements." OMB Question/Request: "Federal agencies disseminate many types of information for many types of programs and functions. Should the OMB guidelines devote particular attention to specific types of information or information dissemination products? If so, please identify the areas where specific focus should be directed, explain why the focus is needed or is desirable, and describe any guidelines that you recommend for those areas." USAID Response:

We recommend that OMB:

a. Prioritize coverage of the guidelines to that data for which the relative degree of data quality is crucial to personal, community or organizational livelihoods, programs or operations. We suggest particular attention to that information which is most important to potentially "affected persons", including data or information which affects funding decisions or entitlement programs, such as census or survey data collections about the U.S. or the U.S. public.

b. Clarify whether or not the guidelines apply to secondary source data that USAID chooses to disseminate to describe the status of development or the results of USAID's programs.

Why? If coverage isn't prioritized, the process of ensuring data quality on all USAID information disseminated to the public could place an unsupported burden on scarce USAID resources and result in the need to restrict information made available to the public.

In summary, we appreciate OMB's efforts to clarify a broad, general provision of law. USAID fully embraces the concept of open and accessible government, and has actively made information available to the public over time in order to be as "transparent" to the public as possible. We believe that the American public is ultimately empowered by having access to the broadest possible range of information available to the government. If you have any questions or comments, please contact me at (202)712-1054 or by email at mamiller@usaid.gov <<mailto:mamiller@usaid.gov>> .

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