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Comments on June 28, 2001 Proposed Guidelines For Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies

The Proposed Information Quality Guidance states the following:

"Information" means any communication or representation of knowledge such as facts, data, or opinions in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition includes information that an agency disseminates from a web page, but does not include the provision of hyperlinks to information others disseminate."

The Proposed Information Quality Guidance as currently drafted EXCLUDES links to other websites. I believe that this exclusion is a mistake. The Information Quality Guidance should INCLUDE hyperlinks to information others disseminate.

Most users of a government web site "assume" that the links from a government site have been reviewed and determined to be reliable. A disclaimer, even if very visible, does not obviate a government's webmaster's obligation to assure that their web site provides credible information.

The public assumes that a government entity

will select what it links to carefully,

utilize a selection process that is fair and equitable

- review the sites it does select for accuracy and consistency with government consumer protection advice, and

- monitor what it selects to assure that it remains accurate and up-to-date.

has undergone an appropriate clearance process

Providing links to commercial sites and to sites that include advocate or lobby for specific policies provide a special challenge to government web sites. These challenges includes:

- how to equitably select from competing commercial organizations who will receive significant benefits by having a federal entity provide links to its site;

- how to decide whether to link to sites that may sell products or services that government consumer protection agencies are advising the public not to use those products and services.

- how to decide whether and how to link to organizations that may provide some good information, but also lobby or advocate positions on its web site that are contrary to current government policies.

- how to assure that the clearance processes for a web site are equivalent to the normal clearance processes that each government agency establishes to assure that government actions are fair and credible.

- how to monitor sites that may provide good information at the time of selection, but then at a later date, may provide questionable information.

- how to decide whether to link to web pages and/or organizations that don't fully adhere to federal laws and recommendations regarding the web (e.g., such as Children's On Line Privacy Protection Act and other FTC rules.)

- how to decide whether to link to web pages that are not accessible to people with older computers, slow modem speeds, or have disability requiring accessible web sites.

In order to assure that its selection of links remain credible, a web site should first establish and publish its selection policy and then establish a process for implementing that process. The rigor of the selection policy and its level of detail could be less if the web site links only to other government sites and should be more if the web site links to commercial organizations or organizations who advocate/lobby policies.

The selection policy should include

- a description of what kind of sites it will link to and what kind of sites it will not link to.

- A list of the characteristics that will be assessed in the review process. For example, some of the characteristics that may be assessed are:

- quality/accuracy of information,

- extent to which material is kept up-to-date,

- absence of questionable information,
- separation of educational material from sales/marketing material,
- separation of educational material from advocacy/lobbying material,
- qualification of authors/peer review of material,
- consistency with basic science recognized authorities,
- consistency with federal consumer protection laws and advice
- extent to which sources of information are identified
- extent to which web features are widely accessible to all members of the public (those technologically disadvantaged (e.g., computers/slow modems) or those with a disability.
- extent to which site collects personally identifiable information

The implementation process should include

- an explanation of how and who will review potential sites to determine if they meet the selection policy. (Having each potential site reviewed by more than one person and by experts in the subject matter is more equitable and credible than vesting all review decisions in a single person.)
- an explanation of how all competing web sites will have an equal opportunity to be part of the federal web site. (Having a mechanism for additional organizations to be proposed for inclusion and a mechanism to rotate similar web sites would minimize giving any one web site an unfair competitive advantage)
- an explanation of how often sites will be reviewed for adherence to the selection policy (Given the frequency that sites change, a once a year review would seem to be the minimum.)

In summary, I believe that the OMB Information Quality Guidance should apply to all links on a government web site because the public assumes that government will link only to credible sites. I also believe that the Information Quality Guidance should list some, if not all, of the considerations listed above, and mandate that each agency publishes its selection criteria and implementation process on its web site.

