



AUG 9 2001

Ms. Brooke Dickson
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

Dear Ms. Dickson:

The National Archives and Records Administration (NARA) appreciates the opportunity to provide comments on the Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, published in the June 28, 2001, *Federal Register*. In general, we concur with the proposed approach in which OMB issues broad guidelines and agencies must issue their own information quality guidelines that are tailored to the types of information that the agency disseminates. Our specific comments are provided below:

In Section IV, Agency Reporting Requirements, paragraph 4 requires agencies to publish a notice in the *Federal Register* announcing the availability of the report of agency information quality guidelines and to post the report on the agency's web site. We support these actions. Paragraph 5, however, implies that the report itself is issued in the *Federal Register*, an action which we do not support. Since the rest of the paragraph concerns the annual report to OMB on complaints to the agency, the reference to the report in the *Federal Register* is unnecessary. It is also not clear which year the first annual report should cover – the first fiscal year for which the guidelines are applicable or the first 12-month period after the guidelines are announced. We believe that paragraph 5 would be clearer if the first sentence is rephrased as “On an annual basis (with the first report covering FY 2003), each agency must submit a report to the Director... .”

In Section V, Definitions, we recommend two modifications of paragraph 1A. The first sentence of the paragraph states “Whether the information is useful to all users of the information, including the public.” Meeting this criterion could be impossible. For information disseminated via the web, “all users” would be every person who views the information. For highly technical information products, the information may be useful to a very limited audience. We suggest that the sentence be qualified as “... useful to its **intended** users, including the public.” We also recommend that the guidance provide definitions of the terms “reproducibility” and “transparency.”

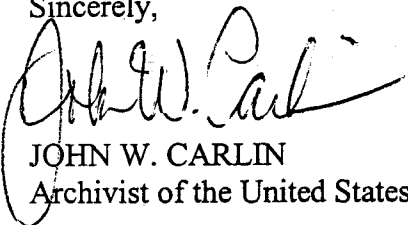
Section V, paragraph 5, “Dissemination” lists several types of information distribution that do not constitute information dissemination covered by the OMB guidance. We believe that an additional exception should be provided for information in records that have been transferred to

the National Archives of the United States. This exception would parallel the statutory exemption of archival records transferred to NARA in the Privacy Act (5 U.S.C. 552a(1)).

We also have questions about OMB's expectations of the agency administrative mechanisms for handling complaints about the quality of information disseminated and requests for corrections. For the Web site is there an expectation that public notification should be a part of the particular set of information or could the notification be similar to the Privacy notice and be documented once on the site? Is there an expectation that the public should have notification, similar to that required of the OMB Information Collection process? Specifically, must each Web and paper information dissemination product include an agency address to which affected persons can report issues? If that is the case, this will cause substantial burden particularly with paper products. These questions should be addressed in the final guidance or transmittal to the guidance.

If you have any questions about our comments, please contact Nancy Allard on 301-713-7360, extension 226.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Carlin". The signature is fluid and cursive, with the first name "John" and last name "Carlin" being the most prominent parts. It is written over a white background.

JOHN W. CARLIN

Archivist of the United States