Record Type:     Record

**To:**     Brooke Dickson Information Quality/OMB/EOP@EOP

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Subject:  CIO Council Request for Comment

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Ms. Dickson:

As requested, I am providing comments from the staff of the Department of
the Navy Chief Information Officer on OMB's draft "Guidelines for Ensuring
and Maximizing the Quality, Objectivity, Utility, and Integrity of
Information Disseminated by Federal Agencies".  These proposed guidelines
were reviewed by both the Enterprise Architecture and Records Management
leads in our office.

GENERAL COMMENTS:

*        These guidelines appear to be consistent with Section 515(a)
requirements and provide adequate amplifying definitions.  There are some
deficiencies, however, that we have noted:

*        These guidelines should be tied to requirements associated with
Records Management (RM) described in OMB A-130.  Rationale:  Electronic RM
solutions provide capabilities to assign, track, and monitor the desired
attributes, as well as serve as repositories for archive and retrieval of
information.
*        Section III suggests that "agencies should consider using their
Enterprise Architecture...to help determine how existing resources can best
fill needs for quality data."  This statement is vague and subject to broad
interpretation/mis-interpretation.  Suggest modifying it to state which
component of the enteprise architecture (business processes, information
flows, data descriptions, applications, technology infrastructure) would
support the objectives.

SPECIFIC COMMENTS:

*        Although section III suggests that "agencies may want to consider
developing different processes to address different types of information",
section V specifically addresses "scientific research".  It is not clear
whether scientific research includes Mapping, Charting, and Geodesy (MC&G)
information.  If not, consider specific language that applies to MC&G
information.  Rationale:  MC&G information is produced by Department of
Defense Components in support of DoD missions.  Some of these products are

disseminated to foreign governments and the public and can result in liability issues for the US Government.

* OMB requested that agencies comment on two questions:

* (1) Should the OMB guidelines devote particular attention to specific types of information or information dissemination products?

* Response: Yes; those with the potential for liability issues (see comment on MC&G information above).

* (2) Should OMB develop specific guidelines to address information that Federal agencies dissemination from a web page?

* Response: No; specific guidelines should be the responsibility of the Federal agencies. OMB should provide high-level requirements and should require agencies to have guidelines for controlling web page content.


Please contact me if you have questions regarding my response.

Regards,
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