OMB Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies
(Guidelines for implementing Section 515 of P.L. 106-554)
NCLIS Comments

NCLIS welcomes the opportunity to offer comments on the OMB proposed guidelines relating to the quality of Government information disseminated by Federal agencies. The need for strengthening agency controls over the quality of their public information, especially with the advent of the Internet Age, is very timely and much needed. In its March 30, 1999 Report on the Assessment of Electronic Government Information Products, NCLIS identified six key findings (out of a total of 16 findings) that are directly relevant to the proposed OMB guidelines:

1   There is an overall lack of Government information policy guiding electronic publishing, dissemination, permanent public access, and information life cycle management, especially as information policy relates to agency missions. Also, there is a lack of overall coordination of these initiatives at the Government, branch, and agency levels.

2. Responsibility for electronic publishing within agencies is decentralized, diffuse, and unclear. Some agencies either could not identify or had difficulty identifying the proper respondent within their own agency, or even the person who was responsible for the specific product.
    Some Government agencies are monitoring the information needs of their users to enhance *current* access to electronic Government information products.

4. There is a lack of understanding of what *ensuring authenticity* entails, and a lack of planning for or consideration of ensuring authenticity of electronic Government information products.

5. The most prevalent medium and format standards identified in the survey are common agency practice rather than agency-mandated.

6. Some Government agencies have established guidelines or best practices for presenting and organizing Government information products on the web, although full compliance with the guidelines is a goal that has not yet been achieved.

Now as to specific NCLIS comments on the proposed OMB guidelines.

First, NCLIS believes that before either OMB or agency responsibilities are spelled out in the guidelines, there should be an introductory section that sets forth several key, overarching (general) Government information quality control

principles and precepts. The following introductory Section I is therefore
suggested:

    I.   *General Government Information Quality Control Principles and Precepts*

1. Government information, regardless of type, medium or format, is
   a strategic national resource that must be safeguarded against
   fraud, waste, abuse and mismanagement just as any other
   government resource or asset must so be protected, including
   government real property resources, materials and equipment
   resources, financial resources, human resources, and natural
   resources. Carefully designed and implemented quality control
   programs for Government information are an essential agency tool
   in this regard.
2. Accountability for the planning, management, and control of all
   Government information products and services disseminated to the
   public will be vested in senior, responsible agency officials, just as
   accountability for the efficient and effective utilization of other
   Government resources authorized by Congress and entrusted to
   agency use for the accomplishment of its respective missions, such
   as appropriated funds, manpower, space, and equipment is so
   vested in specific, named agency officials.
3. Every agency will establish an Agency Information Quality Control
   Program (hereinafter referred to as the AIQCP) that:

> Is composed of a family of complementary agency policies,
> procedures, guidelines, and standards relating to the
> achievement of the Agency Information Quality Control
> Program's goals and objectives;

> Is planned and coordinated under the leadership of the
> agency Chief Information Officer, utilizing the intra-
> agency forum identified below as a mechanism for
> coordination, information interchange, best practices
> identification and portfolio development, and program
> effectiveness monitoring purposes; however, such lead
> responsibility vested in the agency CIO does not obviate
> holding agency program and staff officials responsible for
> the Government information resources they create,
> maintain, and make permanently available to the public;

> Establishes and maintains a single, central, authoritative
> and comprehensive register of all agency Government

information products disseminated to the public, containing the name of every such product, any distinctive identifying number(s), as well as the accountable individual program or staff agency official for each product;

Prepares the initial baseline version of, and periodically updates the AIQCP, including policies, procedures, guidelines, standards, best practices portfolio, and other elements of the AIQCP, as prescribed herein;

Ensures that four key Government information quality control attributes are considered pre-eminent in the design and development of the AIQCP - - *quality, utility, objectivity, and integrity;*

Closely correlates and integrates agency privacy, security, confidentiality, authentication, permanent public availability, systems and database interoperability and interconnectivity, records retention, and other relevant policies, procedures, guidelines, and standards relating to its agency information flows, to and from the public, and holdings maintained for the public;

Ensures that the Government information needs of individual citizens, business and industry, lower levels of Government, research and academic institutions, and other major stakeholder-users of Government information, are solicited, periodically reviewed and revalidated, have practical utility, and take into account in the development and periodic updates of the AIQCP; and

Employs selected established concepts, techniques, methods, and approaches common to the quality control field, including value-added principles, *but tailored and adapted to Government information.* These include, for example, the following selected attributes (agencies may add additional ones, and/or re-express these attributes using definitions more appropriate to their respective and unique missions and conventions):

1. Formatting: This attribute has to do with ensuring that comparable data needs to be displayed in

familiar ways over time so that the user does not
waste energy in using information products;

2. Physical Accessibility: This attribute has to do with
ensuring that if relevant data cannot be identified and
found easily and efficiently in the first instance, and is
not easily accessible, the data will tend not to be used;

3. Intellectual Accessibility: Physical Accessibility is not
enough to ensure use; information products must be
described, indexed, and abstracted in accordance with
established bibliographic conventions so that their
content and context are easily understood;

4. Precision and Accuracy: This attribute has to do with
the level of required accuracy; data may be too
precise, or not precise enough; there is an optimal
level of precision depending on the intended uses of
the products;

5. Currency of data: This attribute will vary, depending
on the particular need and context. In an airline
reservation system, data must be in real time; other
situations may be less dependent on real time
information, such as an inventory control system, but,
nevertheless, have a need for a certain level of
currency;

6. Reliability: This attribute is basically the level of trust
decision makers feel they can place in an information
product's credibility, and other intangible values they
deem of importance;

7. Validity: This attribute has to do with the extent to
which the data is a fair and accurate representation of
reality, or is a proxy of measurement, such as an
indicator of value or performance; and

8. Response Speed: This attribute has to do with the
urgency with which a user requires an answer to his
or her problems, and therefore must be reflected in
the product's physical and intellectual attribute
capabilities.

4. Overall agency oversight responsibility for the leadership,
management, and coordination of the agency's AIQCP is vested
through the agency head in the agency's Chief Information Officer
(CIO);

5. The agency CIO will ensure that an appropriate intra-agency
forum, composed of the agency's major program and staff offices, is

utilized for the purpose of coordinating and monitoring the AIQCP plans and practices, including the development and implementation of agency quality control standards and guidelines; if such a forum is not already in place, the CIO shall establish such a forum;

6. AIQCPs will address the entire Government information life cycle to ensure that policies, procedures, guidelines, and standards apply to the fullest extent to all phases of the life cycle in an integrated, multi-stage manner, rather than in a disconnected, single-stage fashion;

7. AIQCPs should be results-oriented, taking into account the policies and principles contained within the Government Performance Results Act (GPRA);

8. Agencies will take into account applicable International Standards Organization (ISO), American National Standards Institute (ANSI), National Information Standards Organization (NISO), and Federal Information Processing Standards (FIPS) quality assurance and quality control standards and guidelines, when developing their AIQCPs. For example, the ISO 9000 series is a set of three individual, but related, international standards on quality management and quality assurance, some elements of which are directly relevant to information products and services; and

9. Agencies should not overlook professional societies and trade associations as a useful source of information quality control expertise. For example, the American Society for Quality has a number of quality control related publications, programs, and services that could be useful to Federal agencies.

Next NCLIS addresses Section I, OMB Responsibilities. If the foregoing new Introductory Section is included, then Section I becomes Section II.

Add the following sentence to the end of the existing paragraph:

"These guidelines are brought together in a composite form which have two main parts: first, the OMB Guidelines contained herein, and second, the Agency Information Quality Control Programs (AIQCP) prescribed herein."

Next, NCLIS addresses Section II, Agency Responsibilities. Following the new sequencing recommended above, Section II becomes Section III.

Amend the wording of paragraph 1 as follows:

1   "Issue their Agency Information Quality Control Program (AIQCP), taking into account carefully the OMB Guidelines provided herein, including ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by the agency no later than one year after the date of issuance of the OMB Guidelines;"

Next, NCLIS addresses Section III.

Change the title of Section III as follows:

"Agency Information Quality Control Program goals, objectives, and guidelines"

Amend paragraph 2, second sentence, as follows:

Agencies should treat information quality as integral to every step of the entire agency information life cycle, including creation, collection, maintenance, dissemination, records retention scheduling, retirement, disposition, and disposal.

NCLIS has no comments relating to Section IV.

Next, NCLIS addresses Section V, Definitions.

Amend paragraph 1A to read as follows:

"Whether the information is wanted or needed by the agency itself, the public, and/or other government agencies, and, once supplied, the continued value and validity of which has practical utility to one or all classes of users."

Amend third sentence, paragraph 1Bi to read as follows:

"Also, the agency needs to identify the source(s) of the disseminated information to the extent possible, consistent with privacy, confidentiality, and security protections, so that the public, government, and other users can independently assess for themselves the reliability and credibility of the information. Such source(s) include agency in-house individuals and offices, other government agency sources, private sector sources, foreign sources, and other sources. Source citations should be sufficiently detailed so as to permit contacting an individual and/or an office, including, for example, telephone numbers, fax numbers, e-mail addresses, postal addresses, and so forth."

Amend paragraph 1Bii by adding a new fourth sub-paragraph D:

"D. The name, title, and contact information for the agency official attesting to the authentication of the information (the certification authority)."