

INFORMATION QUALITY

I. Purpose

This directive establishes the Department of Homeland Security (DHS) guidelines for ensuring and maximizing the quality, utility, objectivity, and integrity of information.

II. Scope

This directive applies to all DHS Headquarters elements. Other DHS organizational elements with existing directives and instructions on Information Quality may continue to use them, providing they are consistent with the policies and procedures within this Directive. DHS organizational elements without existing policies, or with policies that are inconsistent with this Directive, shall comply with this Directive.

III. Authorities

This directive is governed by numerous laws and regulations including:

- A. Public Law 106-554; H.R. 5658, "Treasury and General Government Appropriations Act for Fiscal Year 2001, Section 515."
- B. "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies." 66 Federal Register 49718, September 28, 2001.
- C. "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies; Final Guidelines." 67 Federal Register 8452, January 3, 2002.
- D. Federal Register Vol. 67, No. 36, page 8452, February 22, 2002, "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies; Republication."

IV. Definitions

- A. **Affected Persons**: people who may benefit or be harmed by the disseminated information. This includes persons who are seeking to address information about themselves as well as persons who use information.

B. **Quality**: an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these three statutory terms, collectively, as "quality."

C. **Utility**: refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the agency disseminates to the public, the agency needs to consider the uses of the information not only from the perspective of the agency but also from the perspective of the public. As a result, when transparency of information is relevant for assessing the information's usefulness from the public's perspective, the agency must take care to ensure that transparency has been addressed in its review of the information.

D. **Objectivity** involves two distinct elements: presentation and substance.

1. "Objectivity" includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within a proper context. Sometimes, in disseminating certain types of information to the public, other information must also be disseminated in order to ensure an accurate, clear, complete, and unbiased presentation. Also, the agency needs to identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a scientific, financial, or statistical context, the supporting data and models, so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Where appropriate, data should have full, accurate, transparent documentation, and error sources affecting data quality should be identified and disclosed to users.

2. In addition, "objectivity" involves a focus on ensuring accurate, reliable, and unbiased information. In a scientific, financial, or statistical context, the original and supporting data shall be generated, and the analytic results shall be developed, using sound statistical and research methods.

a. If data and analytic results have been subjected to formal, independent, external peer review, the information may generally be presumed to be of acceptable objectivity. However, this presumption is rebuttable based on a persuasive showing by the petitioner in a particular instance. If agency-sponsored peer review is employed to help satisfy the objectivity standard, the review process employed shall meet the general criteria for competent and credible peer review recommended by OMB-OIRA to the President's Management Council (9/20/01) (http://www.whitehouse.gov/omb/inforeq/oira_review-process.html), namely, "that (a) peer reviewers be selected primarily on the basis of necessary technical expertise, (b) peer reviewers be expected to disclose to agencies prior technical/policy positions they may have taken on the issues at hand, (c) peer reviewers be expected to disclose to agencies their sources of personal and institutional funding (private or public sector), and (d) peer reviews be conducted in an open and rigorous manner."

b. If an agency is responsible for disseminating influential scientific, financial, or statistical information, agency guidelines shall include a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties.

3. With regard to analysis of risks to human health, safety and the environment maintained or disseminated by the agencies, agencies shall either adopt or adapt the quality principles applied by Congress to risk information used and disseminated pursuant to the Safe Drinking Water Act Amendments of 1996 (42 U.S.C. 300g-1(b)(3)(A) & (B)). Agencies responsible for dissemination of vital health and medical information shall interpret the reproducibility and peer-review standards in a manner appropriate to assuring the timely flow of vital information from agencies to medical providers, patients, health agencies, and the public. Information quality standards may be waived temporarily by agencies under urgent situations (e.g., imminent threats to public health or homeland security) in accordance with the latitude specified in agency-specific guidelines.

4. If, at the end of the public comment period, an agency is not prepared to identify what kinds of original and supporting data will be subject to the reproducibility standard, then the agency must include in its guidelines a statement to the effect that the agency shall assure reproducibility for those kinds of original and supporting data according to - commonly accepted scientific, financial, or statistical standards

E. **Integrity**: refers to the security of information -- protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

F. **Information**: for purposes of the data quality law, Section 515, means any communication or representation of knowledge such as facts or data, 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 that others disseminate. Unlike the OMB Circular A-130 definition, this definition does not include opinions, where the agency's presentation makes it clear that what is being offered is someone's opinion rather than fact or the agency's views.

G. **Government information**: means information created, collected, processed, disseminated, or disposed of by or for the Federal Government.

H. **Information dissemination**: product means any book, paper, map, machine-readable material, audiovisual production, or other documentary material, regardless of physical form or characteristic, an agency disseminates to the public. This definition includes any electronic document, CD-ROM, or web page.

I. **Dissemination**: means agency initiated or sponsored distribution of information to the public (see 5 C.F.R. 1320.3(d) (definition of "Conduct or Sponsor"). Dissemination does not include distribution intended to be limited to: government employees or agency contractors or grantees; intra- or inter-agency use or sharing of government information; and responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar law. This definition also does not include distribution intended to be limited to: correspondence with individuals or persons, press releases, archival records, public filings, subpoenas or adjudicative processes.

J. **Influential**: when used in the phrase "influential scientific, financial, or statistical information", means that the agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions. Each agency is authorized to define "influential" in ways appropriate for it given the nature and multiplicity of issues for which the agency is responsible.

K. **Reproducibility** means that the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. For information judged to have more (less) important impacts, the degree of imprecision that is tolerated is reduced (increased). If agencies apply the reproducibility test to specific types of original or supporting data, the associated guidelines shall provide relevant definitions of reproducibility (e.g., standards for replication of laboratory data). With respect to analytic results, "capable of being substantially reproduced" means that independent analysis of the original or supporting data using identical methods would generate similar analytic results, subject to an acceptable degree of imprecision or error.

V. Responsibilities

A. Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 builds upon the existing Government-wide responsibility to ensure information quality. For agencies subject to the Paperwork Reduction Act, Chief Information Officers (CIOs) must manage information resources to "improve the integrity, quality, and utility of information to all users within and outside the agency, including capabilities for ensuring dissemination of public information, public access to government information, and protections for privacy and security."

The attached publication requires all DHS organizational elements, including offices, and Directorates to have in place the following processes: information review process; information collection process; administrative complaint mechanism; administrative appeal process. The attached publication also contains Reporting Requirements by organizational elements, to the Department's CIO, and by the Department's CIO to OMB.

B. The **Under Secretary for Management** is responsible for all aspects of this directive.

C. The **DHS Chief Information Officer (CIO)** shall:

1. Provide management and oversight to DHS-wide implementation of the law;
2. Develop and issue final information quality guidelines and post them on the Internet, by October 1, 2004;
3. Coordinate standards formulation and posting by the Components and the Departmental Offices and Directorates; and
4. Report to the Director of OMB the number of and nature of complaints regarding compliance with the guidelines for the quality of disseminated information and how such complaints were resolved.

D. **DHS Organizational Elements** shall:

1. Develop and issue final implementation plan for ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, and post them to the Internet, by October 1, 2003;
2. Develop an administrative mechanism for receiving and responding to information quality complaints;
3. Designate a neutral organization responsible to serve as final arbiter regarding an appeal of the Component/Department Office or Directorate decision on an information quality complaint; and
4. Designate officials(s) to be responsible for compliance with the information quality processes within their organization and who shall:
 - a. Maintain quality information procedures and educate officials on their use;
 - b. Develop and manage an administrative mechanism for receiving and responding to information quality complaints and appeals;
 - c. Provide multiple media sources for the filing of complaints (via mail, Internet, etc.);
 - d. Post the information quality procedures and the administrative mechanism on the official Internet Web pages by October 1, 2003;
 - e. Keep official records on complaints beginning October 1, 2003, and retain statistics necessary for annual reports to CIO; and
 - f. Prepare annual reports to CIO beginning November 1, 2003.

VI. Policy & Procedures

- A. The attached publication identifies specific guidelines for DHS compliance with Information Quality requirements.
- B. **Questions or Concerns Regarding the Process**: Any questions or concerns regarding this Directive should be addressed to the Office of the Under Secretary for Management.