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WASHINGTON, D.C. 20503

DEPUTY DIRECTOR
FOR MANAGEMENT

M-06-02

December 16, 2005

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

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SUBJECT: Improving Public Access to and Dissemination of Government
Information and Using the Federal Enterprise Architecture Data Reference
Model

Cost-effective and consistent access to and dissemination of government information is essential to promote a more citizen-centered government.

This memorandum identifies procedures to organize and categorize information and make it searchable across agencies to improve public access and dissemination (section I),¹ discusses using the Federal Enterprise Architecture Data Reference Model (DRM) (section II), and reminds agencies of the breadth of their existing responsibilities primarily related to information access and dissemination, including under the Paperwork Reduction Act of 1995 (44 U.S.C. ch. 35) and the E-Government Act of 2002 (Pub. L. No. 107-347) (attachment).

I. Organizing and Categorizing Government Information and Making it Searchable Across Agencies to Improve Public Access and Dissemination

You have three new requirements in this area although many of you are already meeting them in part. As outlined below, you must now: A) organize and categorize your information intended for public access, make it searchable across agencies, and describe how you use formal information models to assist your dissemination activities; B) review the performance and results of your information dissemination program and describe the review in your Information Resources Management (IRM) Strategic Plan; and C) publish your IRM Strategic Plan on your public website. If you are not currently meeting these requirements, you must begin implementing them now and complete implementation no later than September 1, 2006.²

¹ Section 207(d) of the E-Government Act requires OMB to issue policies – (A) requiring that agencies use standards, which are open to the maximum extent feasible, to enable the organization and categorization of Government information: (i) in a way that is searchable electronically, including by searchable identifiers; (ii) in ways that are interoperable across agencies; and (iii) that are, as appropriate, consistent with the provisions under 3602(f)(8) of title 44, United States Code; (B) defining categories of Government information which shall be required to be classified under the standards; and (C) determining priorities and schedules for the initial implementation of the standards by agencies.

² Activities fulfilling information dissemination requirements outlined in this memorandum and its attachment (including publishing information dissemination product catalogs, directories, inventories, priorities, and schedules) are agency-based electronic government information locator services necessary for your agency information dissemination program.

A) Organize and categorize information intended for public access and ensure it is searchable across agencies.³ The procedures to cost-effectively fulfill this requirement are outlined in two categories below. Increasingly sophisticated Internet search functions (including their crawl and index mechanisms) greatly assist agencies in this area.

- 1) When disseminating information to the public-at-large, publish your information directly to the Internet. This procedure exposes information to freely available and other search functions and adequately organizes and categorizes your information.
- 2) When interchanging data among specific identifiable groups or disseminating significant information dissemination products,⁴ advance preparation, such as using formal information models, may be necessary to ensure effective interchange or dissemination.⁵ This procedure is needed when freely available and other search functions do not adequately organize and categorize your information.

This policy does not prescribe any new or specific thresholds requiring advance preparation of information or what form such preparation must take. Agencies should continue to meet existing requirements, ensure appropriate consultation with users, and consider the significance of the information dissemination product or data interchange to the agency mission and the level of public interest. As significance increases, so too may the need for advance preparation. When using formal information models, you must describe such use in your program description required in part C, below.

B) Continue to review the performance and results of your information dissemination program. This review must now identify any performance gaps when meeting new and existing requirements as well as user needs. Where gaps are found, you should take corrective action as soon as practicable.

³ In describing procedures to provide public access to government information, this policy assumes your agency has fulfilled existing requirements, including all security and privacy responsibilities required by law and policy.

⁴ Specific identifiable groups, also known as user groups and “communities of interest,” can include any combination of Federal agencies, State, local, and tribal governments, industry, scientific community, academia, and specific interested members of the general public. Examples of significant information dissemination products are described in OMB Circular A-130 as those: a) required by law; b) involving expenditure of substantial funds; c) by reason of the nature of the information, are matters of continuing public interest, e.g., a key economic indicator; and d) by reason of the time value of the information, command public interest, e.g., monthly crop reports on the day of their release.

⁵ A “formal information model” unambiguously describes information or data for the purposes of enabling precise exchange between systems. Formal information models typically include definitions of the “entities” (concepts and facts) defined in or managed by the system, as well as relationships or mappings between those entities and the operations/business rules applicable to those entities. Examples of formal information models include, but are not limited to: taxonomies, ontologies, data models (conceptual, logical, and physical), thesauri and other controlled vocabularies, UML class models, entity-relationship models, topic maps, exchange packages, XML schemas and DTDs, data dictionaries, and metadata element sets. Formal information models may be needed to efficiently categorize, disseminate, and share information stored in systems not easily indexed by readily available commercial search technology. These include: 1) structured data sources such as databases, datamarts, and data warehouses; and 2) multimedia collections containing sound, video, and other non-textual information. Some formal information models may be found in consensus or industry standards or widely accepted practices.

C) Publish your IRM Strategic Plan on your public website (together with your information dissemination product catalogs, directories, inventories, priorities, and schedules) and include in your plan a description of:

- 1) Your information dissemination program, how you are meeting your new and existing information dissemination requirements, the results of your program review, and your plans to reduce gaps identified in part B, above; and
- 2) How formal information models, if used, cost-effectively meet your dissemination requirements as described in part A, above, and how they relate to the DRM.⁶

II. Using the Federal Enterprise Architecture Data Reference Model

The DRM introduces concepts, terms, and approaches to aid you in fulfilling your data management responsibilities and you should now begin using it or justify in your enterprise architecture documentation why you are not doing so.⁷ In particular, the DRM can help you meet your current responsibility to:

- 1) Identify how information and data are created, maintained, accessed, and used;
- 2) Define agency data and describe relationships between mission and program performance and information resources to improve the efficiency of mission performance; and
- 3) Define data and describe relationships among data elements used in the agency's information systems and related information systems of other agencies, State and local governments and the private sector.⁸

III. Additional Information

The Chief Information Officers Council will continue to work with OMB and the agencies to ensure the DRM meets existing and evolving needs.

Separate guidance for sharing terrorism information is being developed as required by the Intelligence Reform and Terrorism Prevention Act of 2004. To avoid duplication and lack of interoperability, agencies must ensure their terrorism information sharing activities are consistent with this memorandum's guidance concerning use of the DRM.

To assess agency implementation of this policy, OMB will review agency budget submissions, IRM Strategic Plans, agency enterprise architecture activities, and annual reports required under the E-Government Act. Based upon this assessment, as required by section 207(d)(3) of the E-Government Act, OMB will modify this policy as needed and work with the agencies to promote continued improvements in public access to government information, identify cost-effective opportunities to reduce duplicative processes, and promote more efficient and effective information resources management.

⁶ The DRM can be found at: <http://www.whitehouse.gov/omb/egov/a-5-drm.html>

⁷ Use of the DRM will be reviewed as part of your annual EA assessment and justifications for not using it must include reasonable evidence the DRM is not necessary or is not a cost-effective method to meet agency requirements. Evidence could include a comparison of costs and performance results against established baselines.

⁸ OMB Circular A-130, "Management of Federal Information Resources," section 8b2(b)(iv).

This memorandum is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity against the United States, or any of its departments, agencies, entities, officers, employees, or agents, or any other person.

Selected Existing Responsibilities Primarily Related to Information Access and Dissemination¹

You are already required to:

1. Consider the effects of agency efforts on the public, State and local governments, and industry to avoid undue burden and inappropriate competition; establish and maintain communications with and provide adequate notice to the public, State and local governments, and industry prior to initiating, substantially modifying, or terminating significant information dissemination products;²
2. Adopt a basic standard of data quality (including objectivity, utility, and integrity) as a performance goal and incorporate information quality criteria into agency dissemination practices;³
3. Ensure records management programs provide adequate and proper documentation of agency activities and ensure the ability to access records regardless of form or medium;⁴

¹ This list is not intended to be all-inclusive. To understand your full range of responsibilities you must continue to refer to OMB Circular A-130 (<http://www.whitehouse.gov/omb/circulars/a130/a130trans4.pdf>) and other OMB policies.

² OMB Circular A-130, "Management of Federal Information Resources," section 8a6(b), (i) and (j) and Appendix IV. To carry out effective information dissemination programs, agencies need knowledge of the marketplace in which their information dissemination products are placed. They need to know what other information dissemination products users have available in order to design the best agency product. As agencies are constrained by finite budgets, when there are several alternatives from which to choose, they should not expend public resources filling needs which have already been or could be met by others in the public or private sector. Agencies have a responsibility not to undermine the existing diversity of information sources. This includes avoiding inappropriate competition with industry. One way agencies can avoid inappropriate competition is to provide access to underlying data they use internally, but let market forces determine the extent to which value added services are provided to users.

At the same time, an agency's responsibility to inform the public may be independent of the availability or potential availability of a similar information dissemination product. That is, even when another governmental or private entity has offered an information dissemination product identical or similar to what the agency would produce, the agency may conclude that it nonetheless has a responsibility to disseminate its own product. Agencies should minimize such instances of duplication but could reach such a conclusion because legal considerations require an official government information dissemination product.

In order to minimize the cost and maximize the usefulness of government information, the expected public and private benefits derived from government information should exceed the public and private costs of the information, recognizing that the benefits to be derived from government information may not always be quantifiable.

When maintaining communications with the public involves information collections covered by the Paperwork Reduction Act of 1995, agencies must continue to follow associated OMB policies.

³ Federal Register in Volume 2, No. 67 at 8452 on February 22, 2002, "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies."

⁴ OMB Circular A-130, "Management of Federal Information Resources," section 8a4 and associated National Archives and Records Administration regulations and guidance.

4. Disseminate information to the public on timely and equitable terms;⁵ avoid exclusive, restricted, or other distribution arrangements that interfere with the availability of information dissemination products on a timely and equitable basis; avoid establishing restrictions or regulations, including the charging of fees or royalties, on the reuse, resale, or re-dissemination of information dissemination products;⁶ unless specific exceptions apply, set user charges for information dissemination products at a level sufficient to recover the cost of dissemination but no higher and exclude from calculation of the charges costs associated with original collection and processing of the information;⁷
5. Establish, maintain, and publish inventories, priorities, and schedules of all agency information dissemination products;⁸ take advantage of all dissemination channels;⁹ and use aids to locate government information such as catalogs and directories;¹⁰ and
6. Help the public locate government information including by December 31, 2005, providing on your principal websites search capabilities appropriately equivalent to industry best practices to assist the public in locating government information intended for public use.¹¹

⁵ Timely and equitable terms include among other things, meeting requirements of section 508 of the Rehabilitation Act, providing to members of the public without electronic access alternative ways to obtain information, e.g., hard copies, and when providing access to information via an agency Website, accommodating users without state-of-the-art technologies (e.g., without broadband access) and enabling Website access independent of a specific vendor's Web browser or a particular version of such a browser. See OMB Circular A-130 section 8a5(d) and Appendix IV for additional information regarding timeliness and equitability.

⁶ OMB Circular A-130, "Management of Federal Information Resources," section 8a7(a) and (b).

⁷ OMB Circular A-130, "Management of Federal Information Resources," section 8a7(c). Exceptions to this policy are: (i) where statutory requirements are at variance with OMB policy; (ii) where the agency collects, processes, and disseminates the information for the benefit of a specific identifiable group beyond the benefit to the general public; (iii) where the agency plans to establish user charges at less than cost of dissemination because of a determination that higher charges would constitute a significant barrier to properly performing the agency's functions, including reaching members of the public whom the agency has a responsibility to inform; or (iv) where the Director of OMB determines an exception is warranted.

⁸ OMB Memorandum M-05-04, "Policies for Federal Agency Public Websites." In addition to publishing inventories of specific information dissemination products, agencies must also publish inventories of other information to which public access is appropriate. In deciding what other information to include on an inventory and permit access by the public, agencies should take the broadest possible view and assume at least some members of the public or specific users will be interested in the data. Such additional information could include databases of underlying data even though actual use would require a high degree of sophistication. Again, it could be appropriate for an agency to make this information available, but let the market determine what value added services are desired by the public.

⁹ OMB Circular A-130, "Management of Federal Information Resources," section 8a5(d)(iii) and (6)(g), dissemination channels include Federal, State and local governments, libraries, private sector entities, and the Government Printing Office.

¹⁰ OMB Circular A-130, "Management of Federal Information Resources," section 8a6(c) and (d).

¹¹ OMB Memorandum M-05-04, "Policies for Federal Agency Public Websites," available at <http://www.whitehouse.gov/omb/memoranda/fy2005/m05-04.pdf>. Search capabilities employing industry best practices include mechanisms to crawl and index agency information and thereby promote search and retrieval by the public.