

**Functional Series 500 – Management Services
ADS 578 – Information Quality Guidelines**

*This is a new ADS chapter.

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ADS 578 – Information Quality Guidelines

578.1 OVERVIEW

Effective Date: 10/01/2002

This chapter adopts the OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies (referred to in this ADS chapter as the OMB Guidelines) and contains the USAID-specific policy directives and required procedures to implement the OMB Guidelines. The OMB Guidelines implement section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Pub. L. 106-554). The OMB Guidelines

- Apply to the sharing of, and access to, information disseminated by Federal agencies; and
- Require that each Federal agency
 - a. Issue pre-dissemination review guidelines ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by the agency;
 - b. Establish correction procedures allowing affected persons to seek and obtain correction of information maintained and disseminated by the agency that does not comply with the OMB Guidelines; and
 - c. Report annually to OMB
 - (1) The number and nature of complaints received by the agency regarding the accuracy of information disseminated by the agency; and
 - (2) How such complaints were handled by the agency.

The OMB Guidelines apply to a wide variety of government information dissemination activities that may range in importance and scope. They apply to all media -- printed, electronic, or in other form. The OMB Guidelines require agencies to meet basic information quality standards. The more important the information, for example, "influential scientific or statistical information," the higher the quality standards to which it should be held.

The OMB Guidelines recognize, however, that information quality comes at a cost. Accordingly, agencies should weigh the costs and the benefits of higher information quality in the development of information, and the level of quality to which the information disseminated will be held. Such costs include agency processing effort, respondent burden, maintenance of needed privacy, and assurances of suitable confidentiality.

(See [OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, Final Guidelines](#) (Issued February 22, 2002) and [OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, Final Guidelines, with Request for Comments](#) (Effective October 1, 2001))

578.2 PRIMARY RESPONSIBILITIES

Effective Date: 10/01/2002

- a.** The Chief Information Officer (CIO) is responsible for this ADS chapter and overall policy guidance on information quality guidelines. The CIO is also responsible for receiving and responding to appeals of USAID correction decisions and for submitting an annual report to OMB.
- b.** The Team Leader for Information Quality, Office of the Deputy CIO for Policy (M/AA), is responsible for managing the administrative correction and reporting systems required by the OMB Guidelines and for compiling the annual report to OMB.
- c.** Bureaus, Missions, Independent Offices, and other operating units are responsible for following the pre-dissemination review procedures. (See **578.3.1**, Pre-Dissemination Review)
- d.** The originating office (the operating unit that authored or funded the development of the information) is responsible for reviewing requests for correction, taking any corrective action, and informing the Team Leader for Information Quality of the review and any action taken. (See **578.3.5**, Correction Procedures)

578.3 POLICY DIRECTIVES AND REQUIRED PROCEDURES

578.3.1 Pre-Dissemination Review

Effective Date: 10/01/2002

Originating offices must review information products for compliance with this chapter at every step, including the creation, collection, and maintenance of information, before it is disseminated. (See **578.3.4**, Quality Standards by Category) Such pre-dissemination review applies to information first disseminated by USAID after October 1, 2002. It does not cover material that is still being actively disseminated but was first released before October 1, 2002.

USAID has adopted the OMB Guidelines' basic standards of quality, objectivity, utility, and integrity for information covered by this chapter. Information quality -- which includes objectivity, utility, and integrity -- is integral to every step of the development of information. (See **578.6** for definitions of the terms used in this chapter.)

578.3.2 Information Covered

Effective Date: 10/01/2002

The primary focus of this chapter is on the dissemination of substantive information (i.e., reports, studies, and summaries) rather than information prepared for the management and operations of USAID that is not intended primarily for public dissemination.

This chapter applies to information that is "disseminated" by USAID. Information is disseminated by USAID if

- USAID produced the information primarily for public dissemination, i.e., not primarily for internal USAID use;
- The information is released to the public either directly by USAID or by another organization under USAID "sponsorship"; and
- The information represents USAID's official position.

Information is under USAID "sponsorship" when the information is distributed on USAID's behalf, as when USAID specifically directs the dissemination or retains the right under the provisions of the applicable contract, grant, or cooperative agreement to approve whether and how to disseminate the information.

The fact that USAID retains ownership or other intellectual property rights because USAID financed the information or it bears the USAID seal or logo or other indication of USAID financial support is not an indication that it represents USAID's official position.

578.3.3 Information Not Covered

Effective Date: 10/01/2002

- a. This chapter does not apply to press releases, fact sheets, press conferences, or similar communications in any medium that announce or support the announcement or give public notice of information that USAID has disseminated elsewhere.
- b. If a particular distribution of information is not covered by this chapter, the chapter will apply to a later distribution in which USAID adopts, endorses, or uses the information to formulate or support a regulation, guidance, or other USAID decision or position.
- c. For information not covered by this chapter, USAID assumes no responsibility for its accuracy and is simply providing the public with quicker and easier access to the information.

578.3.4 Quality Standards by Category

Effective Date: 10/01/2002

As illustrated in the [Categories of USAID Information](#) Internal Mandatory Reference, USAID has divided its information into six categories and has the following quality standards for each category. If a particular document or product is not specifically mentioned, the originating office must determine the most appropriate category and accompanying standard. As a general rule the process to ensure quality begins at the inception of product development.

578.3.4.1 Planning and Management Information

Effective Date: 10/01/2002

Program policy and strategy planning documents, program reviews, development activity analyses, and design and authorization documents are Included in this category.

Covered information in this category must be prepared in accordance with the standards in [ADS 201](#) on planning, [ADS 203](#) on quality of data reported in the Performance Monitoring Plan, [ADS 203](#) on Data Quality, [501](#), [540](#), and other Agency guidance.

578.3.4.2 Programs, Products, and Services Information

Effective Date: 10/01/2002

Program and development activity performance, results and evaluation reports, press releases, employment information, and procurement and assistance opportunities are included in this category.

Covered information in this category must be prepared in accordance with the standards in [ADS 203](#), [501](#), [540](#), [557](#), and other applicable guidance.

578.3.4.3 Policy, Legislative, and Regulatory Standards, and Enforcement Information

Effective Date: 10/01/2002

Covered information in this category must be prepared in accordance with the standards in [ADS 501](#), [556](#), [557](#), and other applicable guidance.

578.3.4.4 Research and Statistical Information

Effective Date: 10/01/2002

Scientific or statistical original or supporting data must be developed using sound statistical and research methods. If the results have been subject to formal, independent, external peer review, the information will generally be considered of acceptable objectivity.

578.3.4.5 General Reference Information

Effective Date: 10/01/2002

Information, education, and communication ("IEC") materials developed by or on behalf of the Agency must conform to the highest standards of practice developed over 25 years of work in the development field. These standards may include but are not limited to understanding the needs of the audience, identifying the medium used to communicate messages (e.g., radio, print, TV), drafting concepts (e.g., poster, brochure, public service announcement), field testing concepts, revising, and producing final products. To the extent practicable, the technical content of the materials must be drawn from existing standards of practice developed within particular sectors (e.g., business, health, governance).

578.3.4.6 Influential Scientific, Financial, or Statistical Information

Effective Date: 10/01/2002

a. Reproducibility of Results

In addition to pre-dissemination review standards (see **578.3.1**), the OMB Guidelines have reproducibility requirements for "influential scientific, financial, or statistical information." (See [OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, Final Guidelines](#) (Issued February 22, 2002) and [OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, Final Guidelines, with Request for Comments](#) (Effective October 1, 2001))

The OMB Guidelines distinguish between "original and supporting data" and "analytic results." Originating offices must ensure the reproducibility of original and supporting data according to commonly accepted scientific, financial, or statistical standards. Originating offices must ensure that analytical results receive especially rigorous reviews when reproducibility is not achievable through public access because of confidentiality protection or compelling interests.

b. Principles for Determining Whether Information Is "Influential"

The originating office is responsible for determining whether information is influential.

The OMB Guidelines define "influential" information as information that the agency reasonably can determine "will have or does have a clear and substantial impact on important public policies or important private sector decisions."

A "clear and substantial impact" is one that the agency is firmly convinced has a high probability of occurring. If it's merely arguable that an impact will occur, or if it is a close judgment call, then the impact is probably not clear and substantial. To determine that there is a clear and substantial impact, the agency must have greater certainty than

would be the case for many ordinary factual determinations.

The impact must be on "important public policy or private sector decisions." Even if information has a clear and substantial impact, it is not influential if the impact is not on a public or private decision that is important to policy, economic, or other decisions.

Influential information is limited to scientific, financial, or statistical information. Other types of information, no matter how important the information may seem to be, are not covered as "influential information" under the OMB Guidelines. Also the influential standard applies to the "information" itself, not to decisions that the information may support. Even if a decision or action is itself very important, a particular piece of information supporting it may or may not be "influential."

In rulemaking, influential information is scientific, financial, or statistical information that can reasonably be regarded as outcome determinative with respect to one or more key issues in a significant rulemaking, as that term is defined in Executive Order 12886. The "outcome determinative" part of this standard reflects the "clear and substantial impact" language in the OMB Guidelines. The reference to key issues on significant rules reflects the "important" public policy language of the guidelines.

In non-rulemaking contexts, two factors – breadth and intensity – are considered in determining whether information is influential. Every piece of disseminated information, and every decision made based on disseminated information, may be important to someone. That does not mean that disseminated information used for each decision is influential, as the term is used in the guidelines.

In determining whether information is influential, USAID offices must consider whether the information affects a broad range of parties. Information that affects a broad, rather than a narrow, range of parties (e.g., an entire category of organizations, as opposed to a single company) is more likely to be influential.

USAID organizations must consider whether the information has an intense impact. Information that has a low-cost or modest impact on affected parties is less likely to be influential than information that can have a very costly or crucial impact. In most cases, information that has an intense impact on a broad range of parties should be regarded as influential. Information that affects a broad range of parties, with a low-intensity impact, or information that affects a narrow range of parties, with a high-intensity impact, may or may not be influential.

The "influential" designation is intended to be applied to information very sparingly. It is not expected that USAID will have many instances of "influential" data.

578.3.5 Correction Procedures

Effective Date: 10/01/2002

a. Affected Persons

An affected person (including a group, organization, or corporation as defined by the Paperwork Reduction Act of 1995) may request the timely correction of information disseminated by USAID. The term "affected person" means anyone who may use, benefit from, or be harmed by the disseminated information.

b. Information Covered

The correction process applies to covered information disseminated by USAID after October 1, 2002 (regardless of when the Agency first disseminated the information). It also applies to any information product disseminated prior to October 1, 2002, that USAID continues to use in its decision-making or that USAID and the public rely on as official USAID data. Such information products are, in effect, constantly being re-disseminated and, therefore, subject to the correction process. Requests for corrections are limited to corrections of information and do not include interpretations of information.

Sometimes USAID disseminates studies, analyses, and other information products before they are final. USAID will consider correction requests for such preliminary products when USAID determines that

- (1) An early response by the USAID Team Leader for Information Quality would not delay issuance of the final product, and
- (2) The requester has shown that actual harm is reasonably likely to occur if USAID does not resolve the complaint before issuing the final product.

c. Submitting a Request for Correction

After October 1, 2002, if an affected person believes that information covered by these guidelines is not accurate, clear, complete, or unbiased, he or she may submit a written request for correction to the USAID Team Leader for Information Quality.

Requests must be made in writing. Both the envelope and the request must be clearly marked "Information Correction Request" and be addressed to

Team Leader for Information Quality
Office of the Deputy CIO for Policy, M/AA
U.S. Agency for International Development
Room 6.09-030, Ronald Reagan Building
1300 Pennsylvania Ave., NW
Washington, DC 20523

The request must

- Explain how the person is affected by the information;
- Contain contact information, including mailing address, fax, e-mail, telephone number, and any organizational affiliation;
- Clearly indicate the specific information believed to be in error, including the name of the document containing the information, the source, e.g., USAID web page, the date of issuance, and a detailed description of the information to be corrected;
- State specific reasons why the information does not comply with the OMB Guidelines and any suggestions on how it should be corrected; and
- Include any supporting documentation that the requestor wants considered as part of the correction process.

The requester has the burden of demonstrating that he or she is an "affected person" and that a correction is necessary.

The Team Leader for Information Quality must forward the request to the originating office. If it is determined that a request does not reasonably describe the disseminated information source or the information the requester asserted to be incorrect, the Team Leader for Information Quality or designee must either advise the requester what additional information is needed to identify the particular information or otherwise state why the request is insufficient.

d. Responding to a Request

The originating office must respond to the Team Leader for Information Quality within 45 calendar days of receipt of the request. The Team Leader for Information Quality must respond to the requester within 60 calendar days of receipt of the request. If the request requires more than 60 calendar days to resolve, the Team Leader for Information Quality must inform the requester that more time is required and indicate the reason why and an estimated decision date. Such reasons may include, but are not limited to, a need to review many records identified in a single request, or a need to consult with other USAID offices or other Federal agencies having a substantial interest in the request. Acknowledgment of receipt of a request may contain a request for additional information needed to make a determination.

The 60-day response period described above begins on the day the request is received. For an improperly addressed request, the 60-day response period begins on the latter of the day the request is received or would have been received with the reasonable exercise of diligence by USAID.

USAID will correct information and disseminate such corrected information only to the degree and in the manner that is appropriate for the nature and timeliness of the information involved. For example, a mass mailing and a press release might be used to correct a widely disseminated error of wide public interest or importance, whereas informal communication by letter or telephone might be used for a less widely disseminated error. USAID will take corrective action within a reasonable time after USAID has made a determination that correction is appropriate. Review for correction of information that is potentially a moving target will be based on the information available at the time of dissemination. Information that is based on the "best available evidence" is an example of a potentially moving target.

The correction process is designed to address the genuine and valid needs of USAID and its constituents without disrupting Agency operations. If a request is "frivolous", USAID may deny the request without further review for correction. Frivolous requests include those made in bad faith or without justification, or deemed inconsequential, unduly burdensome, unnecessary, or duplicative (e.g., USAID has responded to an earlier similar request).

USAID must respond to the requestor by letter, e-mail, or fax. The response must explain the findings of USAID's review and any actions that USAID will take in response.

e. Appealing a Decision

If the affected person requesting a correction does not agree with USAID's decision (including the corrective action, if any), the person may appeal to the CIO or designee in writing. The appeal must be clearly marked "CIO Information Correction Appeal" and be addressed to

Chief Information Officer
U.S. Agency for International Development
Room 6.09-030, Ronald Reagan Building
1300 Pennsylvania Ave., NW
Washington, DC 20523

The written appeal must be submitted to the CIO within 60 calendar days of the date of the letter stating USAID's decision.

The CIO must notify the appellant whether his or her appeal was granted or denied and what corrective action, if any, the Agency will take. The CIO response to the appeal must be made within 60 calendar days of receiving the written appeal. The 60-day response time may be extended for up to 30 more calendar days if necessary or appropriate.

The 60-day response period begins on the day the appeal is received. If the request

requires more than 60 calendar days to resolve, the CIO must inform the appellant that more time is required and indicate the reason why and an estimated decision date. For an improperly addressed appeal, the response period begins on the latter of the day the appeal is received or would have been received with the reasonable exercise of diligence by the CIO.

578.3.6 Information Quality Web Site

Effective Date: 10/01/2002

The Team Leader for Information Quality must maintain an information quality site on USAID's public web site. (See http://www.usaid.gov/about/info_quality/) The purpose of the information quality site is to meaningfully inform the public about the Agency's information quality practices and procedures. The information quality site must include, at a minimum, access to the Agency's information quality guidelines and an easy-to-understand explanation of the Agency's procedures regarding requests for correction (which will include an explanation of how a person may file a request and, subsequently, an administrative appeal of the Agency's response to the request). The Team Leader for Information Quality may also include other types of information, such as a description of significant corrections that the Agency has made as a result of the correction procedures.

578.3.7 Reporting Procedures

Effective Date: 10/01/2002

The CIO must submit to OMB an annual fiscal-year report providing quantitative and qualitative information on the number and nature of correction requests received by USAID and how USAID responded to them.

578.4 MANDATORY REFERENCES

578.4.1 External Mandatory References

- a. [Office of Management and Budget \(OMB\) Circular A-130](#)
- b. [OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, Final Guidelines](#) (Issued February 22, 2002) and [OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, Final Guidelines, with Request for Comments](#) (Effective October 1, 2001)
- c. [Paperwork Reduction Act of 1995 \(Pub. L. 104-13\)](#)
- d. [Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 \(Pub. L. 106-554\)](#)

578.4.2 Internal Mandatory References

- a. [ADS 200, Introduction to Managing for Results](#)
- b. [ADS 201, Planning](#)
- c. [ADS 203, Assessing and Learning](#)
- d. [ADS 501, The Automated Directives System \(ADS\)](#)
- e. [ADS 540, USAID Development Experience Information and Reference Services](#)
- f. [ADS 556, Congressional Reports](#)
- g. [ADS 557, Public Information](#)
- h. [Categories of USAID Information](#)
- i. [USAID Information Quality Web Site](#)

578.5 ADDITIONAL HELP

578.6 DEFINITIONS

Effective Date: 10/01/2002

affected person

Anyone who may use, benefit from, or be harmed by the disseminated information. (Chapter 578)

capable of being substantially reproduced

Means that independent reanalysis of the original or supporting data using the same methods would generate similar analytical results, subject to an acceptable degree of imprecision. (Chapter 578)

dissemination

Agency initiated or sponsored distribution of information to the public (see 5 C.F.R. 1320.3(d) definition of "Conduct or Sponsor" and OMB Circular A-130). Dissemination does not include distribution 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 limited to correspondence with individuals or persons, archival records, public filings, subpoenas, adjudicative processes, or press releases, fact sheets, press conferences, or similar communications in any medium that announce or support the announcement or give public notice of information USAID has

disseminated elsewhere. (Chapter 578)

government information

Information created, collected, processed, disseminated, or disposed of by or for the Federal government. (Chapter 578)

influential information

Information that the agency reasonably can determine will have or does have a clear and substantial impact on important public policies or important private sector decisions. (Chapter 578)

information

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. 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. (Chapter 578)

information dissemination product

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. (Chapter 578)

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. (Chapter 578)

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 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, supporting 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 or statistical context, the original or supporting data must be generated, and the analytical results must be developed, using sound statistical and research methods.

1. If the results have been subject to formal, independent, external peer review, the information can generally be considered of acceptable objectivity.
2. In those situations involving influential scientific or statistical information, the results must be capable of being substantially reproduced, if the original or supporting data are independently analyzed using the same models. Reproducibility does not mean that the original or supporting data have to be capable of being replicated through new experiments, samples, or tests.
3. Making the data and models publicly available will assist in determining whether analytical results are capable of being substantially reproduced. However, these guidelines do not alter the otherwise applicable standards and procedures for determining when and how information is disclosed. Thus, the objectivity standard does not override other compelling interests, such as privacy, trade secret, and other confidentiality protections. (Chapter 578)

quality

An encompassing term comprising utility, objectivity, and integrity. Therefore, the OMB Guidelines sometimes refer to these four statutory terms, collectively, as "quality." (Chapter 578)

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 reproducibility and transparency of information are relevant for assessing the information's usefulness from the public's perspective, the agency must take care to ensure that reproducibility and transparency have been addressed in its review of the information. (Chapter 578)

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