

## **U.S. OFFICE OF PERSONNEL MANAGEMENT INFORMATION QUALITY GUIDELINES**

The Office of Personnel Management (OPM) publishes these guidelines in accordance with the Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies (Governmentwide Guidelines) published by the Office of Management and Budget (OMB) in the Federal Register in Volume 66, No. 189 at 49718 on Friday, September 28, 2001, updated in Volume 67, No. 2 at 369 on Thursday, January 3, 2002, and corrected in Volume 67, No. 36 at 8452 on February 22, 2002. These Governmentwide Guidelines were issued pursuant to Section 515 of the Treasury and General Government Appropriations Act for FY 2001 (Public Law 106 –554).

In response to the legislation and the published OMB Governmentwide Guidelines, OPM identifies the following policies and procedures for ensuring and maximizing the quality, objectivity, utility and integrity of information disseminated by OPM. OPM incorporates by reference in its policies and standards the information quality standards in OMB's Guidelines.

OPM also establishes additional procedures for affected persons to seek and obtain correction of information maintained and disseminated by OPM that does not comply with standards set out in these Guidelines or the OMB Governmentwide Guidelines. These procedures apply to information disseminated by OPM on or after October 1, 2002, regardless of when the information was first disseminated.

### **Section I. Procedures for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Prior to Dissemination**

OPM will maximize the quality of the information it disseminates, in terms of objectivity and utility, first by looking for input from a range of sources and perspectives, to the extent practicable under the circumstances, and second by subjecting draft materials to a review process involving as many OPM program offices as may be in a position to offer constructive input, as well as other offices within other Federal agencies.

In the OMB Governmentwide Guidelines, “quality” is defined as an encompassing term comprising utility, objectivity and integrity.

#### **A. Objectivity and Utility of Information**

1. As defined in Section IV below, “objectivity” is a measure of whether disseminated information is “accurate, clear, complete and unbiased;” “utility” refers to the usefulness of the information to its intended audience. OPM is committed to disseminating reliable and useful information. Before disseminating information, OPM staff will subject such draft information to a review process. It is the primary responsibility of the OPM program office drafting information intended for dissemination to pursue the most knowledgeable and reliable sources reasonably available to confirm the objectivity and utility such information.

2. Much of the information OPM disseminates consists of or is based on information submitted to OPM by other Federal agencies. OPM expects that these agencies will subject information submitted to OPM to adequate quality control measures. In drafting the material to be disseminated, the program office will review and verify the data submitted by the agencies, as necessary and appropriate.
3. In seeking to assure the “objectivity” and “utility” of the information it disseminates, OPM will follow a basic clearance process coordinated by the program offices drafting information intended for dissemination. The quality control process places responsibility for action upon the program offices. The program offices will consult with all other program offices throughout OPM having substantial interest or expertise in the material proposed to be disseminated. Where appropriate, substantive input will be sought from other Government agencies, non-government organizations and the public.
4. The program office will consider the uses of the information from both the perspective of OPM and the public. When it is determined that the transparency of information is relevant for assessing the information’s usefulness from the public’s perspective, the program office will ensure that transparency is appropriately addressed.
5. When the program office determines that the information it will disseminate is influential scientific, financial or statistical information, extra care will be taken to include a high degree of transparency about data and methods to meet the OMB Governmentwide Guidelines’ requirement for the reproducibility of such information. In determining the appropriate level of transparency, the program office will consider the types of data that can practicably be subjected to a reproducibility requirement given ethical, feasibility, and confidentiality constraints. OPM will assure reproducibility for those kinds of original and supporting data according to commonly accepted scientific, financial, or statistical standards. In making these determinations, the program office will apply especially rigorous robustness checks to hold analytical results to an even higher standard than original data and document what checks have been undertaken.
6. The program office responsible for the dissemination of information will consider steps such as the following to assure the “objectivity” and “utility” of the information to be disseminated:
  - a. Preparing a draft of the document after consulting the necessary parties, including Government and non-government sources, as appropriate;
  - b. Determining necessary internal and external clearance points;
  - c. Determining where the decision to disseminate the information shall be made;
  - d. Determining whether peer review would be appropriate, and if necessary, coordinating such review; and
  - e. Obtaining clearances.

7. Hard-copy public dissemination of information and all information published on OPM's website shall occur only after clearances are obtained from all appropriate program offices, and as appropriate, the Office of the Director.
8. The quality control procedures followed by OPM will vary with the nature of the information and the manner of its distribution.
9. These guidelines focus on procedures for the "dissemination" of "information," as those terms are defined herein. Accordingly, procedures specifically applicable to forms of communication outside the scope of these guidelines, such as those for correspondence or press releases (covering information that OPM has disseminated elsewhere), among others, are not included.

#### B. Integrity of Information

1. "Integrity" refers to the security of information, protection of the information from unauthorized, unanticipated or unintentional modification, to prevent information from being compromised through corruption or falsification.
2. Computer security is the responsibility of the Chief Information Officer. The Office of the Chief Information Officer (OCIO) oversees matters relating to information integrity, including the design and implementation of the security architecture for OPM, periodic audits of security architecture components and review and approval of changes to the technical baseline. OPM's Information Technology (IT) Security Policy, procedures and controls are risk-based, cost-effective and incorporated into the lifecycle planning of every IT investment. Additionally, OCIO and program offices assess risks to systems and implement appropriate security controls; review annually the security of systems; and develop plans to remediate all security weaknesses found in independent evaluations and other security audits and reviews, such as integrity issues.

### **Section II. Requests for Correction of Information Publicly Disseminated by the Office of Personnel Management**

OPM works continuously to be responsive to users of its information and to ensure quality. When OPM receives any information from the public that raises questions about the quality of the information it has disseminated, OPM duly considers corrective action.

- A. Persons seeking to correct information affecting them that was publicly disseminated by OPM may submit such requests to the Chief Information Officer, 1900 E Street, NW., Washington, DC 20415-7900. Persons should clearly indicate that the communication is a "Request for Correction" under Section 515 of the Treasury and General Government Appropriation Act for Fiscal Year 2001. Persons seeking correction should provide all supporting documentation necessary for OPM to resolve the complaint. At a minimum, persons seeking correction should provide the following information with the initial request:

1. The requester's current home or business address, telephone number or email address in order to ensure timely communication;
  2. Identification and description of the information that is being contested;
  3. Description of the aspect of the information that needs to be corrected;
  4. An explanation of how they are affected by the information;
  5. An explanation of how the information identified does not comply with OPM or OMB guidelines; and
  6. Description of the requested corrective action.
- B. If the information disseminated by OPM and contested by an affected person was previously disseminated by another Federal agency in virtually identical form, then the complaint should be directed to the originating agency.
- C. Requests will be received by the Chief Information Officer, and typically, requests raising substantive issues will be forwarded to the program office within OPM responsible for the subject area.
- D. These guidelines apply only to requests submitted as outlined in Section II.A above. These guidelines will not be applied to any other form of request and also may not be applied to a request submitted consistent with the procedures outlined above, if OPM determines:
1. That the request is not submitted by an *affected* person for the correction of publicly *disseminated information* of OPM, as those terms are defined in these guidelines, or
  2. The information required in Section II.A above has not been provided in full.

All requests submitted as outlined in Section II.A above that are not excluded under the criteria identified in D.1 or D.2 of this section, will be considered "covered requests" and will be processed under these guidelines.

- E. If OPM determines that a request is not covered by these guidelines, it will so advise the requester in writing within 60 calendar days, unless there is a reasoned basis for an extension, in which case OPM will inform the requester that more time is required and indicate the reason why and an estimated decision date. If a request is deemed frivolous, no response will be made.
- F. For covered requests, the program office reviewing the request will give the request due consideration, including a review of the disseminated information at issue and other materials, as appropriate. Where the reviewing program office determines that the information publicly disseminated by OPM warrants correction, it will consider appropriate corrective measures recognizing the potential implications for OPM.
- G. When considering covered requests to determine whether a corrective action is appropriate, the reviewing program office may consider the factors in Section II.D in addition to the following factors:
1. The significance of the information involved, and

2. The nature and extent of the request and the public benefit of making the requested correction.
- H. If OPM determines that a request is covered by these guidelines, but that corrective action is unnecessary or is otherwise inappropriate, OPM will notify the requestor in writing of its determination within 60 days, unless there is a reasoned basis for an extension, in which case OPM will inform the requester that more time is required and indicate the reason why and an estimated decision date.
  - I. If OPM determines that a request is covered by these guidelines and that corrective action is appropriate, it will notify the requester in writing within 60 calendar days of its determination and what action has been or will be taken, unless there is a reasoned basis for an extension, in which case OPM will inform the requester that more time is required and indicate the reason why and an estimated decision date. Subject to applicable law, rules and regulations, corrective measures may be taken through a number of forms, including, but not limited to: personal contacts via letter or telephone, form letters, press releases or postings on the OPM website to correct a widely disseminated error or address a frequently raised request. Corrective measures, where appropriate, should be designed to provide reasonable notice to affected persons of such correction.

### **Section III. Procedures for Requesting Reconsideration**

- A. The following procedures are available to an affected person who has filed a covered request for correction of public information in accordance with Section II above; who received notice from the Chief Information Officer of OPM's determination; and who believes that OPM did not take appropriate corrective action. Requests determined by OPM to be not covered by the guidelines and requests determined to be frivolous will not be reconsidered under these provisions.
- B. To request reconsideration, persons must submit their request to the Chief Information Officer using the contact information in Section II.A above. Persons should clearly indicate that the communication is a "Request for Reconsideration" under Section 515 of the Treasury and General Government Appropriation Act for Fiscal Year 2001, and should include a copy of the request for correction previously submitted to OPM and OPM's response. Requests for reconsideration must be submitted within 30 calendar days of the date of OPM's notification to the requester of the disposition of the underlying request for correction.
- C. OPM's Deputy Director will consider the request for reconsideration, applying the standards and procedures set out in Section II above and will make the final determination regarding the request. In most cases, the requestor will be notified in writing of the determination, and if appropriate, the corrective action to be taken, within 60 calendar days unless there is a reasoned basis for an extension, in which case OPM will inform the requester that more time is required and indicate the reason why and an estimated decision date. OPM will give reasonable notice to affected persons of any corrections made.

## **Section IV. Definitions**

- A. “Affected” person is an individual or entity who may use, benefit or be harmed by the disseminated information. This includes both persons seeking to address information about themselves or about other persons to whom they are related or with whom they are associated, as well as persons who use the information.
- B. “Dissemination” means agency initiated or sponsored distribution of information to the public (see 5 CFR 1320.3(d) “Conduct or Sponsor”) including third-party information as defined in item I. below. Dissemination does not include distributions of information or other materials that are:
1. intended for Government employees or agency contractors or grantees unless OPM represents the information as, or uses the information in support of, an official OPM position, or the grantee is disseminating the information at the request of OPM, or the grant requires OPM approval of the information request;
  2. intended to be limited to intra- or inter-agency use of sharing of Government information;
  3. produced in response to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or similar law;
  4. correspondence or other communication limited to individuals or to other persons, within the meaning of paragraph G below; or
  5. communications such as fact sheets, press releases, interviews, speeches and similar statements, but only to the extent that they announce, support the announcement or give public notice of information that OPM has disseminated elsewhere.

Also excluded from the definition are archival records that contain information disseminated prior to October 1, 2002; public filings; responses to subpoenas or compulsory document productions; or documents prepared and released in the context of adjudicative processes to the extent that the adjudicative process provided an opportunity to contest information quality in a timely manner. These guidelines do not impose any additional requirements on OPM during adjudicative proceedings and do not provide parties to such adjudicative proceedings any additional rights of challenge or appeal.

- C. “Influential,” when used in the phrase “influential scientific, financial or statistical information,” refers to disseminated information that OPM determines will have a clear and substantial impact on important public policies or important private sector decisions.
- D. “Information,” for purposes of these guidelines, including the administrative mechanism described in Sections II and III above, means any communication or representation of facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative or audiovisual forms. This definition does not include:
1. opinions, where the presentation makes clear that the statements are subjective opinions, rather than facts. Underlying information upon which the opinion is based may be subject to these guidelines only if that information is published by OPM;

2. information originated by, and attributed to, non-OPM sources, provided OPM does not expressly rely upon it. Examples include hyperlinks on OPM's website to information that others disseminate and reports of advisory committees published on OPM's website;
  3. statements related solely to the internal personnel rules and practices of OPM and other materials produced for OPM employees, contractors or agents;
  4. descriptions of the agency, its responsibilities and its organizational components;
  5. statements, the modification of which might cause harm to the national security, including harm to the national defense or foreign relations of the United States;
  6. statements of Administration policy; however, any underlying information published by OPM upon which a statement is based may be subject to these guidelines;
  7. testimony or comments of OPM officials before courts, administrative bodies, Congress or the media;
  8. investigatory material compiled pursuant to U.S. law or for law enforcement purposes in the United States; or
  9. statements that are, or that reasonably may be expected to become, the subject of litigation, whether before a U.S. or foreign court or in an international arbitral or other dispute resolution proceeding.
- E. "Integrity" refers to the security of information, protection of the information from unauthorized access or revision, to prevent the information from being compromised through corruption or falsification.
- F. "Objectivity" addresses whether disseminated information is being presented in an accurate, clear, complete and unbiased manner, including background information where warranted by the circumstances.
- G. "Person" means an individual, partnership, association, corporation, business trust or legal representative, an organized group of individuals, a regional, national, State, territorial, tribal or local government or branch thereof, or a political subdivision of a State, territory, tribal or local government or a branch of a political subdivision, or an international organization;
- H. "Quality" is an encompassing term comprising utility, objectivity and integrity. Therefore, the guidelines sometimes refer these four statutory terms, collectively, as "quality."
- I. "Third-Party Information" means information, prepared by an outside party, that OPM disseminates in a manner that reasonably suggests that OPM agrees with the information and that provides the appearance that the information represents OPM's view. This information is covered by these guidelines.
- J. "Utility" refers to the usefulness of the information to its intended users, including the public.