



HHS TRANSMITTAL 86.01
Public Affairs Management Manual
Issue Date: 11/21/86

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Material Transmitted

Public Affairs Management Manual (in entirety)

Material Superseded

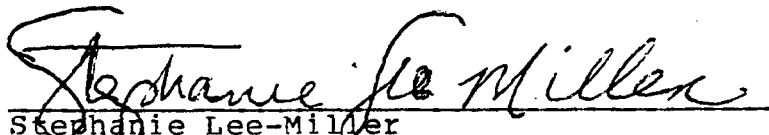
This supersedes the prior Public Affairs Management Manual in its entirety (HHS Transmittal 80.01 (12/5/80))

Backaround

The intent of this manual is to update and clarify established departmentwide policies, standards and procedures for public affairs management of all informational materials intended for the various publics served by **HHS**. The manual sets forth the organization and operation of the public affairs management system consistent with the authority of the Assistant Secretary for Public Affairs and delineates the procedures for the review and coordination of all communications activities.

Filing instructions

Remove the superseded material and replace it with the new material. Post receipt of this transmittal to the HHS Checklist of Transmittals and file this transmittal in sequential order after the checklist.


Stephanie Lee-Miller
Assistant Secretary for Public Affairs



PUBLIC AFFAIRS MANAGEMENT MANUAL

DEPARTMENT OF HEALTH AND HUMAN SERVICES

OFFICE OF THE
ASSISTANT SECRETARY FOR PUBLIC AFFAIRS

NOVEMBER 1986

PUBLIC AFFAIRS MANAGEMENT MANUAL

PLAN OF THE MANUAL

SCOPE AND ORGANIZATION

This manual summarizes the organization, operations, responsibilities, and management principles basic to carrying out the public affairs mission of conducting effective two-way **communications** between HHS and the American public.

In doing so, the manual defines the relationship between the Office of the Assistant Secretary for Public Affairs and the public affairs units in the HHS agencies, offices and regions. It sets forth policies covering the production and distribution of publications, audiovisuals, the setting up of exhibits and the review of public affairs services contracts. The manual also defines responsibility for public affairs planning, evaluation, financial accountability, staff development and for implementing the Freedom of Information and Privacy Acts, and it sets forth the requirements related to the operation of HHS clearinghouses and information centers.

The requirements in this manual also apply to all program components that expend funds for communication products and services for such purposes as technical assistance, health education, consumer education or consumer affairs, program promotion, program development, beneficiary services and others.

Communication products include booklets, magazines, flyers, brochures, pamphlets, circulars, newsletters, news releases, feature articles, posters, radio and TV public service spot announcements, films, slides, film strips, videotapes, still photographs and exhibits.

Communication services include the use of consultants and contracts for all of the above products or services related in any way to the planning, production, use, effectiveness, impact **and** evaluation of these products.

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Subject: PUBLIC AFFAIRS MANAGEMENT GOALS

1-00-00 Goals

1-00-00 Goals

Whether at the Office of the Secretary level or within one of HHS' Staff/Operating Divisions offices, public affairs activities in HHS share the following mission:

- A. to strengthen public understanding of HHS programs and policies;
- B. to inform potential participants in HHS programs of the services and benefits available to them;
- C. to clarify the complex issues often associated with HHS' far-reaching programs;
- D. to enhance the public's 'right to know' through the implementation of the Freedom of Information Act and
- E. to provide advice and counsel to HHS officials to assure that public affairs considerations are properly represented in the planning and decision-making processes.

In addition, OASPA administers the Privacy Act and its requirements on the protection of information contained in systems of records.

Subject: MANAGEMENT STRUCTURE

2-00-00 Background
05 Office of the Assistant Secretary for Public
Affairs
10 Staff/OPDIVs Public Affairs Offices
15 Regional Office Public Affairs Activities

2-00-00 BACKGROUND

In a department as large and diverse as HHS, the conduct of a public affairs operation requires careful coordination. Thus a fundamental responsibility of the Office of the Assistant Secretary for Public Affairs (OASPA) is to exercise functional management--including guidance, policy direction and technical assistance of all public affairs activities throughout the department. The public affairs offices of the Staff and Operating Divisions (**Staff/OPDIVs**) in turn have a responsibility for responding to this guidance and for assuring an appropriate response to their sub-units.

This chapter of the Public Affairs Management Manual defines the relationship between OASPA and other public affairs units in terms of functions and responsibilities.

2-00-05 THE OFFICE OF THE ASSISTANT SECRETARY FOR PUBLIC AFFAIRS

A. General Responsibilities

The Office of the Assistant Secretary for Public Affairs serves as the Secretary's principal counsel on public affairs matters, conducts a national public affairs program, provides centralized leadership and guidance for public affairs activities within HHS' staff and operating divisions and regional offices, and administers the Freedom of Information and Privacy Act.

B. Plans and Budgets

OASPA is responsible for analyzing and exercising functional supervision **over** public affairs plans and budgets throughout the department. (See Chapter 4).

C. Public Affairs Materials

The OASPA mandate includes authority to review and approve all informational materials produced with HHS funds. This includes, but is not limited to, news releases, publications (both external and internal) and audiovisuals (whether developed in-house or obtained under contract, or by grant).

Approval must be obtained for all communications products and services at the appropriate stage as set forth in succeeding chapters (see Chapters 4, 5, 6, and 8).

As circumstances warrant, OASPA may delegate certain clearance responsibilities to public affairs chiefs or other appropriate executives within HHS' Staff and Operating Divisions.

D. Public Affairs Personnel

Selection of chief public affairs officers in the Staff/OPDIVs and other chief public affairs personnel at the agency and sub-unit levels is to be made with the concurrence of the Assistant Secretary for Public Affairs. Selections of subordinate public affairs personnel in Staff/OPDIVs, agencies, and sub-units does not require such concurrence. Additionally, the Assistant Secretary coordinates and advises on public affairs personnel matters throughout the department.

2-00-10 STAFF/OPDIV PUBLIC AFFAIRS OFFICES

A. Principal Responsibility

The basic responsibility of the central public affairs offices of each Staff/OPDIV and its sub-units is to support that organization's program priorities and to provide effective public affairs assistance in carrying out its mission.

At the same time, each Staff/OPDIV and sub-unit public affairs staff has a no less important responsibility to cooperate in department-wide public affairs programs, to support HHS policies and priorities, and to conform with the standards, procedures, and practices established by OASPA.

B. Coordination

The chief public affairs executives of the constituent HHS **Staff/OPDIVs**, agencies and offices are responsible for coordinating the activities of the public affairs sub-units and for evaluating their communication plans and programs, accounting for the dollar obligations involved, and ensuring the efficiency and effectiveness of their activities. In HHS regional offices, the Regional Directors have these responsibilities.

C. Sharing Reports

As appropriate, public affairs offices will, upon request, make available to OASPA and other HHS public affairs offices reports on significant current activities and projects and such other information which may be useful.

D. Public Affairs Materials

Public Affairs chiefs will be responsible for reviewing proposals for publications, audiovisuals and exhibits, public affairs services contracts, and clearinghouse and information center operations and for submitting approved proposals for clearance by OASPA.

E. Approval Authority

No public affairs activities or expenditures are to be initiated without the approval of the public affairs chiefs except as chiefs may specifically delegate such authority. OASPA is to be consulted by public affairs chiefs prior to assigning a delegation of authority to others.

F. Budget and Reporting

Public Affairs chiefs will be responsible for obtaining detailed annual operating plans and projections of dollar obligations from all public affairs components' from program offices employed in communications and from clearinghouses and information centers. They are responsible for reviewing and approving those plans and projections and forwarding them to OASPA.

Subject: COMMUNICATION PLANNING IN HHS
3-00-00 INTRODUCTION

The Office of the Assistant Secretary for Public Affairs is responsible for policies and activities related to how the department communicates directly with the public through multi-media campaigns and educational programs involving the media. This process includes communications planning, product development, distribution **and** evaluation. **OASPA** reviews and monitors such programs and, as required, provides technical assistance in conducting these projects.

This chapter provides guidelines for the communications planning process. Documentation supporting a proposed campaign or program should reflect careful and complete communication planning essential to communications success.

The following steps are generally regarded as fundamental to a successful communications planning process.

3-00-05 STATEMENT OF PROBLEM OR NEED

A well-conceived statement of the problem or need shall drive the communications-battle because it drives the entire process. It should be stated in such terms as behavior to be influenced; information gap to be closed; misconception to be remedied. It should also attempt to assess the importance of the problem in a manner that encourages prioritization and the allocation of resources. Note: 'Mandated by P.L. --' is rarely sufficient since public laws are frequently couched in general terms not lending themselves to identifying strategies, messages or audiences.

3-00-10 STRATEGY STATEMENT

A strategy statement should be developed. It defines, in broad terms, how the problem will be solved and explains the rationale for expecting one approach to work better than alternatives. Therefore, the statement should identify the principle alternatives. The **terms of the** strategy statement should be such that identification of messages, audiences and intermediaries will flow clearly from it. This statement should also include the goals and objectives of the campaign, the intended audience, and the changes expected to take place as a result of it.

3-00-15 DEFINING THE MESSAGE

Early in the development process, the message or theme of the project should be decided upon. Specific wording is usually developed as the project progresses. Deciding on the broad theme of the campaign is an important aspect of articulating the information, motivation or understanding the target audience will receive if the strategy is successful.

3-00-20 IDENTIFICATION OF TARGET AUDIENCES

If these steps are taken, it should be possible to identify target audiences with some precision and to recognize and deal with some special problems inherent to particular audiences.

'The general public' is rarely an adequate identification of a target audience. In most cases, the problems that give rise to a **campaign** are more critical to one segment of the population than another.

3-00-25 INTERMEDIARIES

The department often deals with complex issues in which there is significant involvement by private sector organizations or non-federal public sector entities. In some cases, these organizations can be effective resources for augmenting communications efforts, disseminating information or distributing materials and lending support at the national, regional, or community level. For these reasons, it is advisable to consider the possible role such organizations might play in a communications program.

3-00-30 ALLOCATING RESOURCES

Estimating the resources necessary to conduct a program is another way of answering the question "How important is the problem?" In general, and particularly in a time of fiscal constraint, the scale of resources an agency is prepared to devote to a problem is an indicator of the perceived seriousness of that problem. While cost estimates for a project will probably change between concept and implementation, it is important early in a project to examine cost implications and weigh alternatives to develop potentially cost-effective methods of achieving communications goals.

3-00-35 MEDIA SELECTION

Having determined the target audience, careful attention should be paid to selecting the media which most effectively reaches these audiences. Government agencies generally cannot reach target audiences with the same precision as private industry since they must rely on free time and space and compete with other public sector organizations competing for the same limited availabilities. However, by careful planning and creative approaches they can often reach their audiences effectively. In particular, alternatives to the fiercely competitive and very limited time available on commercial television should be examined and 'unorthodox' media should be considered.

3-00-40 COMMUNICATIONS PRODUCTS

Just as creative approaches in media are required, so too are creative approaches in the production of communications products. A number of HHS agencies have developed unique vehicles for delivering messages ranging from modular programming to rock videos. Many take advantage of the numerous formats available on radio and create messages tailored to particular formats. **Many**, recognizing the importance of 'localization,' identify a local source of help or information rather than a national number. **While** there are more media outlets than ever before -- with the growth of cable, local publications, specialty magazines -- there is also greater competition. Therefore, products need to be not only more carefully crafted, to capture audience attention, but better thought out to take full advantage of the medium.

3-00-45 DISTRIBUTION PLAN

Every HHS communications program is expected to contain a well thought out plan for the distribution of communications products. It should indicate through what mechanisms, in what quantities, and at what times the materials produced will finally reach their audiences. If intermediaries are involved, they should be identified.

3-00-50 PRETEST OF MATERIALS

Pretests can provide information about whether message concepts or materials are likely to work with intended target audiences. Pretesting provides more than categorical answers. It also offers important feedback and diagnostic information useful in modifying the product to make it more effective.

3-00-55 QUALITY CONTROL

The mechanical processes of production and distribution often take the most time and do require attention to detail. Every campaign should have built into its timelines adequate quality control steps both in production and distribution. Simply, products should look the way they are intended to look and they should arrive at their destinations on time and intact.

3-00-60 PROMOTION

Potential users of HHS communications materials must be alerted to their availability and motivated to use them. Again, in today's competitive environment even the best intentioned, most socially useful products require cooperative effort and support. Therefore, an effective communications plan will have a strong promotional component. The development of this support mechanism should be factored into the communications planning process.

3-00-65 MEASUREMENT OF OUTPUT

Output is usually thought of as the count of things, activities, events produced and exposures achieved during the course of the project. It is sometimes called "outcome evaluation." Measuring output alone does not prove the campaign has had impact on the problem. However, if the project has been well planned and executed and other measures and research are supportive, it is reasonable to assume impact. It is also an indicator of whether individual products in the mix are pulling their own weight.

3-00-70 MEASUREMENT OF IMPACT

Impact measurement looks for observable changes in the problem. Given the complexity of many issues with which HHS deals and the number of variables involved in social problems, it is difficult, **sometimes** impossible, to determine if communications efforts caused observable changes. Further, the cost of scientifically accurate impact measurement can be prohibitive. However, it is still important to measure change in problems to insure that the communications initiative is dealing with today's problem, not yesterday's.

3-00-75 COST EFFECTIVENESS AND COST-BENEFIT ANALYSIS

Cost-effectiveness analysis combines output measures with costs to determine the cost of a unit of output. Cost of the development, production and distribution of a T.V. public service announcement divided by audience reached yields cost-per-viewer reached; total cost of "800" number service divided by total user calls gives cost-per-caller data. These are efficiency measures and useful yardsticks. They can indicate where changes should be made; where, on a cost basis, at least, the project is effective. They do not address ultimate impact on the problem.

Cost-benefit analysis involves impact measures and indicates the cost of achieving observable changes. Its primary use is to help answer the policy-level question of whether the communications effort was worth undertaking at all. In some instances it may provide information useful in shaping future communications programs.

3-00-80 SUMMARY

The elements described in the **preceeding** are not all inclusive. Not all elements are required in every campaign but all of them should be considered and addressed. They are less a formula than a guideline. The point is to achieve effective communication, to shepherd scarce resources and to encourage disciplined thinking and creativity.

Subject: PLANNING AND DOLLAR OBLIGATIONS

4-00-00	Scope
05	Annual Communication Reviews
10	Public Affairs Planning Review
15	Budgets: Projections, Review, Accountability
20	Expenditure Monitoring
25	Verification
30	Evaluation
35	Distribution

4-00-00 SCOPE

This chapter covers procedures on the submission, review, approval and projected as well as public affairs dollar obligations of communication plans.

4-00-05 ANNUAL COMMUNICATION REVIEWS

Each year OASPA conducts individual reviews of the public affairs operations of the **STAFF/OPDIVs**, their agencies, offices, and the regions for the coming fiscal year. The purpose is to ensure that agency operations support departmental objectives and incorporate sound communication planning practices.

4-00-10 PUBLIC AFFAIRS PLANNING REVIEW

Prior to the reviews, each office will submit a communication plan and budget by a date specified by OASPA.

A. Format

The communication plan and budget will include an explanation of the problems or needs to be addressed, the **communication** objectives, the proposed media to be used, target audiences and intermediaries (if appropriate), and proposed contractual arrangements, distribution **plans**, and major planned activities and products (e.g., publications, special campaigns, audiovisuals, etc.), and the means by which principal campaigns and activities will be evaluated. The communication plan will be prepared by the public affairs office in accordance with a standardized format provided by OASPA.

Along with the plan, each public affairs office will submit a completed Project Clearance Form for each public awareness or **communication** project, each publication, and/or audiovisual. No procurement procedures may begin until the Project Clearance Form is completed and approved at the appropriate level.

B. Review

OASPA' review will include:

1. appraisal of the plan's goal;
2. evaluation of strategies and the effectiveness of the strategies in achieving the stated goal;
3. determination of extent to which the plan supports departmental activities and policies;
- 4 . assessment of projected activities and products to assure relevancy to the needs or goals of the programs which they support and to assure appropriateness; and
5. examination **of the** financial and staffing data to determine their appropriateness to objectives.

C. Concurrence

All plans will be discussed with the public affairs officers as part of the annual OASPA review. Approval to proceed will be given by OASPA in writing.

D. Modification of Approved Plan

Approved plans may be modified without prior consultation with OASPA if the modifications are minor reviews of previously approved strategy and does not increase the total projected annual dollar obligations to be spent on a given communication objective by more than 10 percent. OASPA should be notified in writing of such changes.

E. Notification of Proposed Modification

If a major modification of an approved plan is called for, the public affairs officer must notify OASPA in writing. This notification must state the issues and explain why the modification is needed.

- F. Communications plans will be computerized by OASPA. Printouts and data reports will be made available to **STAFF/OPDIVs** for review periodically and periodic updates of information may be requested by OASPA.

4-00-15 BUDGET: PROJECTS, REVIEWS, ACCOUNTABILITY

- A. Public affairs officers are responsible for:
1. assembling, analyzing and forwarding to OASPA annual budget projections;
 2. monitoring obligations made by components responsible to them and reporting significant deviations to OASPA;
 3. submitting required reports of projected and actual obligations to OASPA.
- B. Following are the responsibilities and procedures ensuring control of HHS public affairs obligations;
1. Projections
OASPA is responsible for a projected departmental public affairs fiscal year budget and for the acquisition of information necessary for communication planning.
 - a. Call
A call for communication plans and projected obligations will be issued to the various public affairs offices and to those program offices engaged in communications activities annually at a date specified by OASPA.

The public affairs chiefs or responsible program offices will submit proposed communication plans and estimated budgets for all their branches and sub-units. Deadlines will be included in the OASPA call.

b. The Format

Responses shall be prepared in accordance with the instructions.

c. Review and Concurrence

Each office's projections will be submitted for final approval to the **ASPA**.

2. Obligations Review and Accounting

OASPA may compile reports covering actual public affairs obligations.

a. Call

The public affairs officers will provide the necessary financial information on actual obligations should such information be required of them.

b. The Format

Responses will follow the guidelines issued by OASPA and may include actual obligations by budget line item and functional objective.

c. Review and Concurrence

Chief public affairs officers will alert OASPA to obligation in excess of 10 percent of projections. Public affairs officers must justify any such excess in a memorandum to the **ASPA**. This explanation should cite the steps being taken to ensure that the final annual obligations will not exceed specified limits or indicate why the excess is justified.

4-00-20 EXPENDITURE MONITORING

- A. Public affairs expenditures that exceed cost estimates by more than 10 percent must have OASPA approval. This provision includes program funds used for a public communication activity.
- B. Public affairs officers anticipating excess expenditures should obtain the necessary concurrence from the budget officer and send necessary forms and documentation to OASPA for approval.

- c. Expenditures not previously reported will require justification.
- D. Budget data will be computerized by OASPA and periodic updating of the information, along with appropriate budget office verification of its accuracy will be required.
- E. The OASPA review of proposals for expenditures beyond the 10 percent level will among other things consider:
 - 1. new legislation;
 - 2. new program directions; and
 - 3. other key department initiatives.
- F. Requests using external contract or consulting services will consider:
 - 1. whether a justification was submitted at the time of the annual review; and
 - 2. whether the requested services could be performed by HHS within the specified time frame.

4-00-25 VERIFICATION

Verification of the accuracy of budget information by appropriate budget offices, in a manner prescribed by OASPA, will be required as a part of the annual call submission.

4-00-30 EVALUATION

As part of the overall communications planning process, and in order to assure more effective communication with the intended audience, OASPA may specify that certain evaluation activities are to be conducted and provided for in individual public affairs plans. This includes communication research, readership **studies**, distributed analyses and determinations of the effectiveness of public service announcements, as measured by a commercial testing service or a comparable research technique. OASPA will require that evaluation plans be developed for all multi-media campaigns and major communication projects. Further, individual evaluations for **publications** will be conducted via the

Publication Evaluation Form upon OASPA discretion. Audiovisuals whose cost exceeds \$50,000 require a written evaluation and may be subject to formal message testing. If the cost exceeds \$100,000, a written evaluation plan and formal message testing are required.

4-00-35 DISTRIBUTION

Distribution is a central part of the communication planning process. Therefore, a distribution plan is required for all communication activities and products and will accompany (or be part of) any plan submitted to OASPA for review.

Subject: REVIEW OF PROPOSED PUBLICATIONS AND PERIODICALS

- 5-00-00 Purpose
 - 05 Scope
 - 10 Responsibilities
 - 15 Definitions
 - 20 Publication Review
 - 25 Operating Procedures
 - 30 Approval of Periodicals
 - 35 Evaluation
 - 40 Publishing Practices

5-00-00 PURPOSE

This chapter establishes policies and procedures for reviewing and approving departmental publications and periodicals prepared by or for the department or for any of its operating components. The goal is **to assure** that HHS publications and periodicals are absolutely necessary to assure that essential services are provided and mandatory provisions of law are carried out. OASPA will determine the department's communication plans and monitor compliance with policies and regulations established by the Congress, the department, and the Office of Management and Budget (hereafter referred to as OMB).

S-00-05 SCOPE

The requirements of this chapter apply to all publications and other documents that are financed in whole or in part by departmental funds (including publications produced through grants and contracts). A full definition of the term "publication" appears under Section **5-00-15**.

5-00-10 RESPONSIBILITIES

- A. Under departmental authority, OASPA is responsible for:
 - 1. determining and establishing publishing policies and procedures that are to be followed by all offices;
 - 2. developing uniform technical and professional standards for departmental publications;
 - 3. monitoring compliance with these policies and standards;

4. appropriate clearance of all publications and periodicals as defined herein; and
5. assuring that evaluations of the effectiveness of publications are conducted, when OASPA deems such to be appropriate.

In carrying out these responsibilities, OASPA serves as a source of technical assistance to **the agencies** and their sub-units, directs the procedure for obtaining OMB approval for periodicals, and monitors publications to assure compliance with regulations.

B. The public affairs officer of each operating division serves as the principal publications official and is responsible for:

1. adherence to the publication policies and procedures stated in this chapter;
2. thorough review and approval of all applicable publication plans, prior to any submission to OASPA;
3. thorough review and clearance of manuscripts, illustrations, graphs, and other pertinent materials; and
4. development and application of a system for evaluating the effectiveness of a publications program.

5-00-15 DEFINITIONS

This section contains a glossary of terms used in this chapter.

1. **Publication:** an item of printed information in the form of books, periodicals, pamphlets, brochures, newsletters, reports, informal circulars, or **posters**, carrying the department's name as the publisher or in which the department has a proprietary interest, whether written or published in the department or outside, regardless of how financed.
2. **Printed Information:** term includes microfilm publishing. Exceptions are news releases, speeches, radio **and** television scripts, employee memos and such other items as may be exempted (in writing) by the **Assistant Secretary for Public Affairs**.

3. Periodical (recurring publication): any publication issued annually or more often with a format, content, and purpose consistent in nature. This also includes any publication that is reprinted due to a need for substantial revisions.
4. Non-recurring Publication: any publication issued on a one-edition basis. This includes items reprinted based on evidence of need to maintain inventory. NOTE: In the case of annual reports, although the information each year may be different, annual reports are considered to be recurring.
5. Reprint: any published document essentially unchanged from the previous printing.
6. Revision: any published document with text and/or graphic changes since the previous printing.
7. Internal Publication: any publication of which not more than 50 copies are to be distributed outside of the Department of Health and Human Services.
8. External Publication: any publication of which 50 or more copies are to be distributed outside of the Department of Health and Human Services. The term "**external**" applies to the Congress, and other Federal, State, and local branches of government, as well as to contractors, grantees, and intermediaries.

S-00-20 PUBLICATION REVIEW

OASPA uses the publication planning clearance procedure to carry out its responsibilities as described earlier in this chapter. OASPA invokes the clearance for all planned publications whether new, reprints or revisions.

In the case of publications, where correct general public understanding, motivation, action and/or reaction **is** critical to the success of a program or to the implementation of provisions of law, rules, regulations, or guidelines, the following may be required by OASPA, at the funding levels indicated, prior to any expenditure of production funds:

<u>Requirement</u>	<u>Total Funding Level</u>
Message Testing (to include a test for readability)	\$ 50,000 or more
Detailed Marketing Strategy	\$100,000 or more
Detailed Distribution Plan (to include evidence that the distribution channels and methods are effective and cost-beneficial)	\$ 50,000 or more

In the case of periodicals, the following may be required by OASPA regardless of funding levels:

<u>Reaurement</u>	
Readership Survey	Within 12 months after first issue and every two years thereafter.
Marketing Plan	Each year, during the last quarter of the calendar year, and not later than December 15th.

The publication review procedure may involve two steps. The first is mandatory. The second may be taken at the discretion of OASPA or the agency. These steps of the review process are as follows:

1. Pre-printing review and clearance by OASPA via the form HHS-615 (Publication Planning and Clearance Request). This review should occur after sufficient details on costs, specifications, and distribution plans can be presented. This form must be approved by OASPA before printing may proceed.

2. Evaluation of publications by agency public affairs chiefs should take place on a systematic basis. OASPA requires that this evaluation be reported via the form HHS-615A on a discretionary and individual basis. One copy of each publication should be sent to OASPA immediately upon issuance and one to four copies to the HHS Library in the HHS North Building, 330 Independence Avenue, SW, Washington, **D.C.** 20201.

The OASPA authority for review and approval, through the above procedures, has been expanded to include "internal" publications. This expansion further serves to aid in the elimination of unnecessary and wasteful communication products, to assure adherence to departmental program needs and to assure that the interests of the public and the department are best served.

Previously exempt from OASPA review authority and control, but now included within that authority are:

- Employee-Related Materials: all magazines, newsletters, fact sheets, and publications such as guides, **introductions** to the various components of the department, awards materials, handbooks, and internal posters are now subject to OASPA review and control
- Training Materials: all training materials are subject to OASPA review and approval.
- Administrative Materials: departmental and operating division catalogs and manuals (except those of a purely technical nature and those whose distribution is limited to the department) require OASPA approval.

The above categories are not all-inclusive. Any questionable items should be submitted to OASPA for review. Where deemed appropriate, OASPA may grant waivers.

Items that continue to be exempt from OASPA review are:

- Desk-to-desk Memos
- News Releases, Speeches, Radio & TV Scripts are exempt from the normal publications review process but must undergo a separate clearance process as outlined in the chapter of this manual entitled "Responsibilities **re:** News Releases, News Conferences and Secretary's Speeches, and the Green Sheet."

S-00-25 OPERATING PROCEDURES

A. Planning Review

An agency undertaking the production of a new publication, or the reprint or revision of an existing one, must seek OASPA approval through the submission of two (2) copies of form HHS-615. OASPA will accept only those proposals for new publications that have received approval by the chief public affairs officer or a qualified member of the public affairs staff who has been formally designated as having clearance authority for the operating division.

OASPA will review the preliminary scope of work for all contracts or purchase orders that include publications or periodicals as specific deliverables at the RFC stage using form HHS-524. This requirement applies to all contracts covering any aspect of publication for research and statistics.

OASPA review will be conducted in accordance with departmental standards and relevant statutes, regulations and policies. Decisions will be made within 10 working days after proposals are received by OASPA. If a request is not approved, OASPA will state the reasons in writing.

OASPA occasionally may defer clearance pending review of a draft manuscript. In such cases, the clearance form will be returned to the agency and should be resubmitted with the manuscript.

B. OASPA Criteria for Review

1. Clear statement of purpose.
2. Evidence of need on the part of the intended audience. (OASPA makes a clear distinction between "evidence" of need and "statement" of need and between "intended audience" and an intermediary).
3. Evidence that the publication is unquestionably necessary to assure that essential services are provided and mandatory provisions of law are carried out. (OASPA makes a clear distinction between "essential" and "desirable" services and between "mandatory" and "implied" provisions of law). **If** the publication is specifically described in and mandated by law, the specific description and mandate must be cited.
4. Compatibility with departmental and program policies and relevant statutes and regulations.
5. Statement of utility (This answers the question as to what the intended recipient will do with the publication, once in hand--action and/or reaction expected once read).
6. Evidence that the publication is not duplicative of another public or private sector communication effort. Justification for any degree of duplication must be provided for consideration.
7. Clear description of the intended audience and of the distribution plan; and evidence of capabilities for getting the publication into the hands of specific target audiences.
8. Evidence that the same information need or service cannot be fulfilled equally as well by non-government sources and still meet program objectives.
9. Complete breakdown of development and production costs (both direct costs and indirect costs).

10. Evidence that the publication is cost-effective and/or cost-beneficial.
11. Justification for distribution of any free copies and justification as to why recipients cannot or should not pay for copies.

All items for review should be routed to OASPA directly through OPDIV clearance channels and not through the OS Executive Secretariat.

C. Secretarial Endorsement

Agencies seeking the Secretary's personal endorsement of a publication or publication series must seek same through OASPA.

D. GPO and Depository Library Requirements

Under Title 44, the law on printing and binding, all printing must be done through the GPO or through a **GPO-**authorized plant, unless a formal waiver is granted by the Joint Committee on Printing. This policy guarantees that printing contracts will be awarded competitively and that up to 1,200 depository libraries of the United States will receive free copies or microfiches of all **HHS** publications at no additional cost to the department.

5-00-30 APPROVAL OF PERIODICALS

All proposals for new periodicals and all requests for extending the life of existing periodicals must be approved by OASPA and the Office of Management and Budget. A request for such approval must first be cleared by the agency public affairs chief and then submitted to OASPA for approval with required documentation on form HHS-615.

Any proposal for a new periodical must also be accompanied by separate documentation required by OMB Circular A-3, revised May 2, 1985. Form HHS-615 and the documentation required by OMB Circular A-3 are not to be consolidated. Form HHS-615 is for **OASPA's** evaluation purposes, contains more information than is required by OMB, and is not for-warded to OMB.

5-00-35 EVALUATION OF PERIODICALS

OASPA requires an annual review of all existing periodicals, whether A-3 eligible or not, for the purpose of determining whether or not to grant continued approval to publish in the coming year. HHS agencies must complete and submit a revised form HHS-615 in the last calendar quarter, and no later than December 15, to give a picture of costs and other factors for the fiscal year just entered. Those existing periodicals approved by OASPA will be included in the annual report to OMB. Those not receiving reapproval from OASPA will cease publication. It should be noted that previous approval by OMB does not override **OASPA's** authority to disapprove continued publication.

5-00-40 PUBLISHING PRACTICES

A. Style

The "Style Manual" of the Government Printing Office will be the principal guide in the preparation of manuscripts for publication.

B. Cover Identification

All publications produced by or for the department shall contain, in accordance with the regulations of the Joint Committee on Printing:

1. the title and subtitle:
2. appropriate **identification** of the U.S. Department of Health and Human Services, the issuing **STAFFDIV/OPDIV** and any applicable sub-office (bureau or branch); and
3. the series, title, and number, if applicable.

C. Issue Date

All publications shall bear the month and year of issue.

D. Authorship, Acknowledgement and Credits

As a rule, HHS takes the position that government publications and documents will not display the names of authors, editors, or contributors on covers or spines. This policy is based on the long-standing Federal rule against personal aggrandizement in the conduct of the public business.

- Courtesy Credit Lines: courtesy credit lines are permissible only for uncopyrighted materials contributed or loaned by non-governmental parties. They shall be subordinate in size of type to that of both text and legends for illustrations. When all materials have come from a single non-governmental source, credit lines shall be given only in an undisplayed paragraph.

- Publication By-Lines: the printing of government employees' by-lines in government publications shall be confined to the authors of the articles appearing therein, and to the photographers who have originated the pictures contained therein. The authors' and photographers' by-lines shall be printed in exact juxtaposition with the articles or pictures which they have created.

E. Translation

In budgeting for publications, HHS offices should bear in mind the possible need to translate or provide a separate publication on the same subject in a language other than English. All requests to approve such translated or foreign language publications must be treated as requests separate from the English language version.

F. Discriminatory Language and Allusions

HHS authors, editors, and clearance officers are reminded of the departmentwide directive issued in 1975 to remove objectionable, unnecessary or inaccurate distinctions based on ethnicity, race, handicap, age and sex in publications, documents and forms issued by the department. Manuscripts should be reviewed with this in mind.

G. Braille and Large Type for the Sight-Impaired

Recognizing that many Americans are visually handicapped, the department has set forth guidelines to print materials in a fashion that they may be easily read by the visually handicapped. The department policy for techniques may be found in the Printing Management Manual, Section 2-10-75. This policy should be followed for all materials going to the visually handicapped.

H. Microfilm Publishing

The Government Printing Office issued a recommendation to all Federal departments in 1975 urging the consideration of microfilm publishing in lieu of or in addition to hard copy reproduction for all publications and documents that lend themselves to this format. OASPA endorses this recommendation in the interest of economy and efficiency and will bear this alternate form of printing in mind in its review of proposed publications.

Agencies are urged to consider this option, particularly when developing budgets for publications. Examples of publications that could be printed in this format include statistical tabulations, computer printouts and specific reference materials. Depository libraries can also be served through microfilm copies of departmental publications.

I. Copyright

1. Authorship in-house or under contract: information **created** and published by the Federal government becomes part of the public domain whether authored by government employees or under contract. No copyright can be claimed by private persons or organizations to such materials.
2. Use of copyrighted material: government publications must contain acknowledgements of the use of copyrighted materials produced by non-government persons or organizations when the material has not been created and printed with public funds. Prior permission to use such material must be gained.

OFFICE OF THE ASSISTANT SECRETARY FOR PUBLIC AFFAIRS
PUBLICATION PLANNING AND CLEARANCE REQUEST

APPEND1 X A

SEE THE BACK OF THIS FORM FOR INSTRUCTIONS

PROJECT ID NO. _____	CSD REC'D _____
1. PUBLICATION TITLE _____	
2. OP/DIV _____ AGENCY _____ PROGRAM OFFICE _____	
CONTACT PERSON _____ TELEPHONE _____	
ADMINISTRATIVE COOE _____	
3. CATEGORY OF PUBLICATION:	
a. <input type="checkbox"/> PAMPHLET <input type="checkbox"/> BOOKLET <input type="checkbox"/> PERIODICAL	
<input type="checkbox"/> BROCHURE <input type="checkbox"/> FLYER <input type="checkbox"/> POSTER	
<input type="checkbox"/> MANUAL <input type="checkbox"/> OTHER (<i>Explain</i>) _____	
b. <input type="checkbox"/> <i>NEW</i> <input type="checkbox"/> REPRINT <input type="checkbox"/> REVISION	
(<i>if</i> reprint or revision, attach a copy <i>of</i> latest printing)	
DATE OF ORIGINAL PRINTING _____ DATE OF LATEST PRINTING _____	
c. <input type="checkbox"/> SINGLE ISSUANCE <input type="checkbox"/> SERIES OR PART OF SERIES	
TOTAL NUMBER IN SERIES _____ FREQUENCY OF SERIES _____	
d. SPECIFICALLY DESCRIBED IN AND MANDATED BY LAW ? <input type="checkbox"/> YES <input type="checkbox"/> NO	
<i>If</i> yes, cite the specific Public Law and sections of that law _____	

4. TARGET AUDIENCES (<i>list all</i>) _____	

5. TRANSLATION: <input type="checkbox"/> YES <input type="checkbox"/> NO LANGUAGE _____	
6. DISTRIBUTION MRHOOS (<i>describe</i>) _____	

7. RECOMMENDATION FOR SALE VIA SUPERINTENDENT OF DOCUMENTS. GPO? <input type="checkbox"/> YES <input type="checkbox"/> NO	
ESTIMATED NUMBER OF SALE COPIES _____	
B. SPECIFICATIONS:	
a. NUMBER OF COPIES _____ NUMBER OF DOUBLE-SPACED MANUSCRIPT PAGES _____	
NUMBER OF PRINTED PAGES _____ OR (it folded) NUMBER OF PANELS _____	
b. TRIM SIZE _____	
c. COVER: <input type="checkbox"/> SELF <input type="checkbox"/> SEPARATE	

**OFFICE OF THE ASSISTANT SECRETARY FOR PUBLIC AFFAIRS
PUBLICATION PLANNING AND CLEARANCE REQUEST**

d. PAPER STOCK AND WEIGHT: COVER _____ TEXT _____

e. NO. OF INK COLORS _____

f. SELF-MAILER? YES NO

g. ILLUSTRATIONS: HALFTONES DUOTONES TABLES
 CHARTS DRAWINGS

h. MAIL: FIRST CLASS THIRD CLASS FOURTH CLASS

PIECE RATE @ \$ _____ EACH OR BULK RATE @ \$ _____ OTHER _____

9. JUSTIFICATION (see instructions and use page 3 or a separate *sheet* of paper)

10. PROPOSED PUBLICATION DATE _____

11. PUBLICATION PRODUCTION, PRINTING, AND **DISTRIBUTION** COSTS WILL BE CHARGED TO FISCAL YEAR _____
APPROPRIATION CODE _____

12. PRODUCTION COSTS: I N - H O U S E P R O C U R E D

a. RESEARCH, WAITING, EDITING.. _____

b. **GRAPHICS**..... _____

c. **PHOTOGRAPHY**..... _____

d. COMPOSITION (*typesetting*)..... _____

e. PRINTING..... _____

f. MAILING..... _____

g. O T H E R **DISTRIBUTION/PROMOTION**..... _____

TOTALS..... _____

GRAND TOTAL..... _____

UNIT COSTS..... _____

13. CONTRACT JUSTIFICATION: *Attach the OASPA-approved request for contract and scope of work*

14. APPROVALS:

	TITLE		SIGNATURE		DATE
AGENCY	_____		_____		_____
OP/DIV	_____		_____		_____
OASPA	_____		_____		_____

OASPA. EVALUATION FORM 615A REQUIRED? YES NO

A signed COPY of this form must be submitted with the Printing Request. Printing Officers will not accept requests for composition and/or printing unless accompanied by an OASPA-approved form HHS-615.

INSTRUCTIONS FOR COMPLETING PUBLICATION PLANNING AND CLEARANCE FORM 615

This form is to be used for the production of any publication (as defined in the Public Affairs Management Manual). OASPA approval of this form is mandatory before print production may proceed. OASPA will determine, at the time of approval, whether or not the completion of the Publication Evaluation Form 615A will be required. For periodicals, this form (HHS 615) must be submitted annually to OASPA, during the first quarter of the fiscal year, and no later than December 15, to reflect any new costs.

PROJECT I.D. NUMBER

Use the Identification Number assigned to this project by OASPA when it was submitted for concept review. This number appears on the copy of the Concept Review Form (HHS 676) returned to you by OASPA.

1. Self-explanatory
2. Self-explanatory
3. (b) The term "Reprint" indicates that no changes are to be made to the existing publication.
4. If the target audience is "general public," the term "general public" is defined as an individual, group, or organization outside of the Department of HHS. Contractors, grantees, and intermediaries, whether funded or not funded by the Government, are considered to be "general public."
5. Self-explanatory
6. Examples might be: meetings, mail, exhibits, public publication racks, etc.
7. Do not include the number of recommended sales copies with the number your organization plans to print for free distribution.
8. If you cannot answer all the questions, seek help from your printing officer and postal representative.
9. Justification must include:
 - (a) Clear statement of purpose
 - (b) Evidence of need
 - (c) Clear statement of utility (how the recipient is expected to use the publication)
 - (d) Evidence that publication clearly supports a mandatory program, Departmental initiative, or public law.
 - (e) Evidence that publication is not duplicative of another public/private sector communication effort.
 - (f) Evidence that the publication is cost-effective and/or cost-beneficial.
 - (g) Justification for the number of free copies and justification as to why intended recipients cannot or should not be required to purchase copies.
10. Self-explanatory
11. Approval normally will not be made for fiscal year funds not yet appropriated.
12. In-house production costs should be expressed in terms of salaries and benefits or portions of salaries and benefits.
13. Self-explanatory
14. Signatures of person with approval authority only.

**OFFICE OF THE ASSISTANT SECRETARY FOR PUBLIC AFFAIRS
PUBLICATION EVALUATION REQUEST**

Appendix B

SEE THE BACK OF THIS FORM FOR INSTRUCTIONS

PROJECT ID NO. _____	CSD REC'D _____																																																		
<p>1. PUBLICATION TITLE _____</p> <p>2. OP/DIV _____ AGENCY _____ PROGRAM OFFICE _____</p> <p>CONTACT PERSON _____ TELEPHONE _____</p>																																																			
<p>3. <input type="checkbox"/> NEW PUBLICATION <input type="checkbox"/> REPRINT <input type="checkbox"/> REVISION</p>																																																			
<p>4. DISTRIBUTERS:</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:35%;"></th> <th style="width:15%;">No. Ordered</th> <th style="width:15%;">No. Distributed</th> <th style="width:15%;">No. Not Distributed</th> <th style="width:20%;">To Se Completed</th> </tr> </thead> <tbody> <tr><td>AGENCY</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>CONSUMER INFOR- MATION CENTER</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>CLEARINGHOUSE</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>REGIONAL OFFICE</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>RESOURCECENTERS</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>G.P.O. SALES</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>NTIS</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>OTHER</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>TOTALS</td><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr> </tbody> </table>			No. Ordered	No. Distributed	No. Not Distributed	To Se Completed	AGENCY	_____	_____	_____	_____	CONSUMER INFOR- MATION CENTER	_____	_____	_____	_____	CLEARINGHOUSE	_____	_____	_____	_____	REGIONAL OFFICE	_____	_____	_____	_____	RESOURCECENTERS	_____	_____	_____	_____	G.P.O. SALES	_____	_____	_____	_____	NTIS	_____	_____	_____	_____	OTHER	_____	_____	_____	_____	TOTALS	_____	_____	_____	_____
	No. Ordered	No. Distributed	No. Not Distributed	To Se Completed																																															
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REGIONAL OFFICE	_____	_____	_____	_____																																															
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G.P.O. SALES	_____	_____	_____	_____																																															
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OTHER	_____	_____	_____	_____																																															
TOTALS	_____	_____	_____	_____																																															
<p>5. FOR PUBLICATIONS NOT YET DISTRIBUTED, WHAT ARE THE PLANS FOR THE FINAL DISPOSITION? _____</p>																																																			
<p>6. HAS THE READER RESPONSE SEEN TESTED? (Attach results) _____</p>																																																			
<p>7. DO YOU PLAN TO REPRINT OR REVISE THIS PUBLICATION IN THE NEXT 12 MONTHS? <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If yes, explain _____</p>																																																			
<p>8. IF A SALES DOCUMENT, HOW MUCH REVENUE HAS SEEN RETURNED TO THE GOVERNMENT? \$ _____</p>																																																			
<p>9. IF A PERIODICAL, WHEN WAS THE LAST READERSHIP SURVEY CONDUCTED? _____ (Attach results)</p> <p>WHEN CAN RESULTS OF THE NEXT SURVEY SE EXPECTED? _____</p>																																																			
<p>10. IF A PERIODICAL, WHEN WAS THE MAILING UST LAST PURGED? _____</p> <p>WHAT ARE THE RESULTS? (Attach results) WHEN WILL THE LIST NEXT BE PURGED? _____</p>																																																			
<p>11. THIS EVALUATION IS <input type="checkbox"/> ACCEPTED <input type="checkbox"/> REDIRECTED BY OASPA.</p>																																																			
<p>SIGNATURE _____ DATE _____</p>																																																			

INSTRUCTIONS FOR COMPLETING PUBLICATION EVALUATION FORM. FORM 615A

This form is required at the discretion of OASPA and will provide information about the value and use of the **publication**.

- 1 . **Self-explanatory**
2. Self-explanatory
3. Self-explanatory
4. Enter quantities distributed to date, by each applicable supplier (**distributor**).
5. Self-explanatory
6. Document the methodology and results of the evaluation of reader response.
7. Self-explanatory
8. Revenue can be computed by multiplying the sales price by the number of copies sold since the **Current** printing.
9. Self-explanatory
- 10 . **Self-explanatory**
11. To be completed by OASPA

Subject: REVIEW OF PROPOSED AUDIOVISUALS

6-00-00	Purpose
05	Scope
10	Responsibilities
15	Definitions
20	Operating Guidelines
25	Review Procedures
30	Review Criteria
35	Reporting Procedures

6-00-00 PURPOSE

This chapter describes operating guidelines and procedures for OASPA review of proposals for audiovisual projects. These guidelines and procedures cover all audiovisual materials and activities described in Chapter 1-121-10 of the General Administration Manual and Subpart 3-4, 5400 of the HHS Procurement Manual, with the exception of those related to exhibits, which are covered in Chapter 7 of this manual and information related to communications contract procedures described in Chapter 8. OASPA review is designed to assure the acquisition and production of audiovisual products of high quality; to contribute to cost-effectiveness by assuring adherence to sound production and procurement practices; to ensure the use of audiovisual formats most likely to attain program objectives; to avoid duplication of effort or the development of superfluous materials; to assure that materials are consistent with departmental and governmental policies and regulation; and to avoid the, production and use of materials that might misrepresent the department and be detrimental to the achievement of program goals.

6-00-05 SCOPE

The requirements of this chapter pertain to the review and approval of audiovisual projects and products produced by or for the Department or its components in house under contract or grant, and intended for use with the public, except the following:

- A. Audiovisuals which are produced under contract **or** grant for \$5,000 or less;
- B. audiovisuals produced under formula grants;
- c. audiovisuals produced under, or for which they are to be used as medical research instruments or for documenting experimentation of findings, that are not intended for release to or use by the public.
- D. These materials identified in items A through C are exempt from prior review and approval by the Office of the Assistant Secretary for Public Affairs but are not exempt from the reporting requirements of this chapter. In addition, all materials, regardless of review ~~of~~ reporting procedures, must carry appropriate departmental identification acquired following prescribed procurement methods.

6-00-10 RESPONSIBILITIES

- A. OASPA is responsible for establishing operational guidelines and procedures for the review and reporting of audiovisual proposals; for establishing and applying criteria for the review process; for the identification of specific audiovisuals to be evaluated for effectiveness; for approving or disapproving audiovisual proposals submitted by Departmental components; for the initiation of broadcast news services (such as the preparation and distribution of **newsfilm** or videotape or the production of audio news releases or "actualities") or the purchase or installation of equipment to support these kinds of activities; and for monitoring the production and use of such materials.
- B. The principal public affairs officer of each agency is responsible for administering the provisions of this chapter with respect to **audiovisuals** intended for use by the public; for the review of proposals prior to submission to OASPA; and for developing and applying a system for monitoring the progress of audiovisual projects. No proposal will be accepted for review by OASPA unless it has been approved first by the principal public affairs officer of the office submitting it.

6-00-15 DEFINITIONS

The following definition applies throughout this chapter:

"Audiovisual productions" refer to finished products and to all interim products involved in their completion, distribution, and use. Examples include such products as motion pictures, videotapes, slide shows, filmstrips and multimedia presentations. Also included are the interim production components such as storyboards, layouts, scripts, treatments, sound recordings and editing, and other activities leading to the acquisition, creation, or use of these materials.

- B. Therefore, audiovisual products designed for use in the following situations are considered to require OASPA approval:
1. broadcast on commercial, cable or educational television:
 2. shown in **commercial movie** houses;
 3. shown to such groups as civic associations, schools clubs, fraternal organizations, intermediaries or other groups used to support programs, or similar lay groups; and,
 4. training films.

6-00-20 OPERATING GUIDELINES

- A. Audiovisual proposals developed under contract must be first submitted for review by means of a form 524, "Request for Communications Contract" at the time a Request for Contract (**RFC**) is developed. Before actual production of the audiovisual may be begun, a form 524A "Audiovisual. Clearance Request" must be submitted to OASPA and approved in writing.
- B. Subpart 3-4-54 of the HHS Procurement Manual should be followed when audiovisual activities are to be carried out under contract instruments. The HHS Grants Administration Manual is the regulation in force with respect to audiovisual activities carried out under grant.

- C. Additional procedures for the review and approval of audiovisual procurements and/or productions are defined in Chapter 1-121 of the HHS General Administration Manual and are in force for all audiovisual projects subject to OASPA review and approval as defined previously. OASPA may exercise this prerogative for further review at any stage of the production process. Specific times at which the project must be reviewed by OASPA (i.e., at treatment, script, or interlock) will be noted on the approval form. It then becomes the responsibility of the project officer to make certain that materials are submitted to OASPA for review.
- D. Each request for approval (524A) must contain the name and telephone number of the project officer. Failure to assign a project officer with suitable experience could result in disapproval of the proposal.

6-00-25 REVIEW PROCEDURES

- A. In order to obtain approval for an audiovisual proposal, the originating office must complete a Project Clearance Form, an Audiovisual Clearance Request, form **524A**, and a Request for Communications Contract, form 524, where applicable, and submit it to the principal public affairs component of its parent agency. Following review and approval by that office, the proposal will be sent forward to the next level of authority.
- B. OASPA will review audiovisual proposals on the basis of established criteria (see Section 6-00-30) and other relevant considerations and inform the originating office of its decision. With approved proposals, the original copy of the 524A (together with relevant documentation) is retained for OASPA records; the other copy is returned to the originating office through the channels used for its submission. If the proposal is disapproved, the original will be retained for OASPA files along with relevant attachments; all other materials will be returned to the office of origination with a memorandum stating the reasons for disapproval.
- C. OASPA will endeavor to make its decision and notify the originating office within 10 working days of the log-in time of the request. If it is not possible to conform to the 10 day turn-around time, the originating office will be so informed.

- D. OASPA will indicate any further stages at which additional reviews will be required on the form 524A returned in connection with approved proposals or in an attached memorandum. It becomes the responsibility of the originating office to notify OASPA when the proposal has reached those stages. Failure to do so could result in the delay or cancellation of the project.

6-00-30 LEVELS OF REVIEW: REVIEW REQUIREMENTS

In accordance with the OMB approved Control Plan, the following levels of review are required for all projects involving audiovisual materials:

<u>Project Cost</u>	<u>Requirement</u>
Under \$5,000	Requires agency or operating division approval
Over \$5,000	Requires agency/ operating division approval and OASPA Approval
\$100,000 or more	Requires written distribution and evaluation plan, approvals cited above. Assistant Secretary for Management and Budget sign-off under the provisions of General Administration Manual Chapter 8-15.
\$500,000 or more	All of the above. Formal message testing will normally be required. OASPA monitoring will be required.

6-00-35 REVIEW CRITERIA

Review criteria may vary from one audiovisual proposal to another for many reasons--the stage of development, the purpose of the materials being developed, the format to be used for the final product, the distribution plans, etc. For the most part, the standards by which OASPA evaluates a proposal on the basis of the internal logic presented by the proposer, supplemented by experience and other relevant information. For example, it is not usually feasible to develop or apply Quantitative criteria when dealing with proposals in early stages of development. Therefore, to some degree OASPA decisions must be based on knowledge of past, present and future audiovisual projects; familiarity with policy guidelines, regulations, and statutes relevant to the proposal; and an experienced sense of public reaction to a given proposal.

All or some of the considerations listed below will play a part in the decision to approve or disapprove a proposal:

A. Regulatory or Statutory Requirements

1. Is the material specifically called for or prohibited by any legislative mandate?
2. Is the proposal in conflict with any regulation or statute (such as the law prohibiting paid advertising, and might a waiver of some kind be required before action on the proposal can go forward?
3. Is the correct procedure being used for the proposal?

B. Needs Assessment

1. Has an adequate effort been made to ascertain the availability and usability of materials already existing in other governmental components and in the private sector?
2. Does the proposal fill a priority need of the agency?
3. Has the target audience been sufficiently identified?

C. Appropriateness

1. Is the proposed medium the best and most effective means of conveying the message?
2. Is the message constructed in such a way as to reach the target audience?
3. What is the anticipated "shelf life" or currency of the materials?
4. Is the message in good taste?
5. Is it timely?
6. Is it clear?

D. Procedural Aspects

1. Is there an adequate distribution plan?
2. For materials that have a limited shelf life (such as radio and television public service announcements) have adequate provisions been made for necessary follow-up activities?
3. What evaluations are planned? At what stage of the project?
4. Are costs in line with prevailing prices?
5. Is the project officer qualified?

E. General Considerations

1. Are there elements of the proposal which suggest that the department support certain policies or positions on which it actually has taken no stand?
2. Is the program consistent with or contradictory to stated goals and policies of the department?
3. What effect, if any, will the proposal have on specific programs of the department as well as on the department's overall operational ability?

4. Might the proposal set a binding precedent and, if so, might that precedent ultimately be disadvantageous?
5. Is there anything inherently self-serving about the proposal?

6-00-40 NATIONAL AUDIOVISUAL CENTER REPORTING REQUIREMENTS

Office of Management and Budget (OMB) Circular A-114 "Management of Federal Audiovisual Activities" (April 13, 1978) requires all Federal Agencies to report certain audiovisual activities to the National Audiovisual Center. These reporting requirements, as specified in the OMB-approved HHS Plan for the Control of Production of Periodicals, Pamphlets and Audiovisual Products, are as follows:

- * A completed form SF-282 is required to accompany any Project Clearance Request involving audiovisuals. These forms are submitted at the concept stage.
- * An SF-202, pre-production report, is required to accompany the form **524A**, Audiovisual Clearance Request, when it is submitted for approval.
- * An SF-202, post-production report, must be completed and submitted to OASPA and the NAC at the time of product acceptance.
- * Preparation of the Annual Audiovisual Report (SF-203) is to be completed and submitted in conjunction with the Annual Call for Communications Plans and Budgets. This document, submitted to the National Audiovisual Center, is a verification document. It should reflect prior years' audiovisual activities, as reported in the **preceeding** years' annual call. Differences between prior years planned activities, as shown in the Annual Call, and **actuals** reported in the SF-203 must be reconciled. Any substantive differences, including expenditures that vary by more than 10 percent from estimates, must have been approved in writing by OASPA.

Subject: REVIEW OF PROPOSED EXHIBITS

7-00-00	Purpose
05	Scope
10	Responsibilities
15	Definitions
20	Operating Guidelines
25	Review Procedures
30	Review Criteria

7-00-00 PURPOSE

This chapter covers the guidelines and procedures for review and approval of all exhibits produced with HHS funds whether under grants or under contracts. It also calls for maintaining an inventory of departmental exhibits.

The procedures have been established to:

1. ensure that the design and fabrication of exhibits are high quality and are produced in compliance with department and governmentwide regulations and policies;
2. provide a centralized inventory of departmental exhibits, thereby facilitating effective scheduling of available exhibits and permitting reuse of components to the fullest extent; and
3. establish a central coordinating point for exhibit scheduling, thereby reducing the chance of overlap at meetings, shows and conventions.

7-00-05 SCOPE

- A. The requirements of this chapter apply to all new or refurbished exhibits produced by or for the department, and intended for partial or total external use with any audience, lay or professional.

- B. The reporting requirements apply to existing exhibits, active and inactive, as well as to exhibits constructed in the future, and to the scheduling and associated expenses related to the showing of all exhibits.

7-00-10 RESPONSIBILITIES

- A. OASPA is responsible for establishing guidelines and procedures for approving or disapproving exhibit proposals submitted by departmental components and for monitoring the production and inventory of such exhibits.
- B. The principal public affairs officers of the agencies and regions are responsible for administering relevant provisions of this chapter and for: the review of proposals prior to submission to OASPA; developing and apply a system for monitoring the progress of exhibit fabrication; maintaining inventories of exhibits and schedules of showings; and making an annual review of all exhibits under their jurisdiction.
 - 1. A complete inventory of all exhibits, active and inactive, is to be forwarded to OASPA at the close of each fiscal year, or as required and current records will be available to OASPA at all times.
- C. Public affairs officials are responsible for maintaining records within their respective agencies and regions and for efficient and cost-effective scheduling and staffing of exhibits.
- D. Agency public affairs officials are responsible for the annual reviews of all exhibits to assure the timeliness of panels, photographs, legends and other elements. This review includes a judgment as to whether the exhibit should remain active or whether it should be withdrawn.

7-00-15 DEFINITIONS

- A. For the purposes of this chapter, an exhibit shall be defined as any display, device, or structure designed to inform or educate any audience. All audiovisual and printed products produced for primary or exclusive use in conjunction with an exhibit will be considered to be a portion of the exhibit and will be subject to approval as an integral part of the exhibit.

7-00-20 OPERATING GUIDELINES

- A. Exhibit proposals must be submitted for review at the RFC stage following procedures described in Section **7-00-25** which follows.
- B. Additional procedures for the review and approval of exhibits and procurements are defined in Chapter 1-121 of the HHS General Administration Manual and are in force for all exhibit projects. OASPA may require review of the project at various stages of its development. If so, they will be noted at the time of approval.

It then becomes the responsibility of the project officer to make certain that materials are made available for OASPA review at the appropriate stages. Failure to do so will result in the delay or cancellation of the project.

- C. Each request for approval (**524A**) must contain the name and telephone number of the project officer.

7-00-25 REVIEW PROCEDURES

- A. In order to obtain approval for any exhibit proposal, the originating office or its parent agency should complete the following sequence of actions:
1. If the exhibit is to be developed and/or constructed under contract, a Request for Communications Contract, form 524 must be submitted and approved.
 2. Prior to actual construction, a form **524A**, Audiovisual Clearance Request, must be submitted and approved.

- B. OASPA will review exhibit proposals promptly and inform the originating office of its decision. Upon approval, the original copy of the form together with relevant attachments will be retained in OASPA records. The duplicate copy will be returned to the originating office through the channels which were used for its submission. If the proposal is disapproved, materials will be returned to the office of origination with a memorandum stating the reasons for disapproval.
- C. OASPA will notify the originating office within 10 working days from the log-in time of the request. If unable to adhere to the **10-day** time period, the originating office will be so informed.
- D. OASPA will indicate any further stages at which additional reviews will be required on the approval form or by memo. It becomes the responsibility of the originating office to notify OASPA when the proposal has reached those stages.

7-00-30 REVIEW CRITERIA

- A. All proposed exhibits and major modifications of existing exhibits must specifically reflect program needs and responsibilities, and agency public affairs chiefs are expected to make sure these criteria are met before any submission is made.
- B. The following criteria will be considered:
 - 1. adherence to relevant statutes and regulations and to departmental policy;
 - 2. incorporation of appropriate departmental identification;
 - 3. demonstration that the finished product will meet high standards;
 - 4. demonstration that the project will maintain overall cost-efficiency in design, fabrication, scheduling, storage and that there will be careful review of all costs;

5. compatibility with OASPA planning;
6. whether the proposed exhibit would be duplicative of existing HHS exhibits; and
7. plans for the regular review of the finished exhibit and for abandoning it when obsolescence occurs.

Subject: REVIEW OF PROPOSED PUBLIC AFFAIRS SERVICES CONTRACTS

8-00-00	Purpose and Scope
05	Guidelines
10	Applicability
15	Responsibility
20	Definitions
25	Minority Small Business Firms

8-00-00 PURPOSE AND SCOPE

This chapter establishes policies and procedures for the review and approval of public affairs contracts--other than those dealing with publications, audiovisuals, and exhibits (covered in Chapters 5, 6, and 7 respectively).

Occasionally the use of outside specialists to achieve specific public affairs goals can be more cost-effective than if the attempt were made internally. As a general rule, all such contracts **must be** competitively bid using established and appropriate procurement procedures. The only exception is for contracts through the Small Business Administration under Section 8 (a) of the Small Business Act. No other deviation is permissible unless authorized in writing by the Assistant Secretary for Public Affairs. In addition, consultants hired through contracts must be used in a manner consistent with the applicable regulations (see Chapter 8-15, General Administration Manual).

8-00-05 GUIDELINES

Approval of these special kinds of public affairs contracts must be obtained in writing from OASPA before any procedure action is initiated. Requests for such approval must be submitted in triplicate on Form 524-B (Request for Public Affairs Services Contracts) by the public affairs officer of the administrative unit.

Each request must include the name and telephone number of the project officer. Failure to assign a project officer with suitable experience may result in disapproval of the project. The request should be made at the Request for Contract (RFC of the procurement process stage).

OASPA's review will include but not be limited to the following aspects:

1. Need
2. Appropriateness to the need
3. Effectiveness
4. Coordination
5. Reasonableness of **cost**

8-00-10 APPLICABILITY

The provisions of this chapter apply only to special public affairs services contracts in excess of \$5,000. Those for less than that amount are not subject to OASPA review.

8-00-15 RESPONSIBILITY

The public affairs chiefs **of the** administrative units seeking approval of special authorization for a non-competitive contract are expected to provide written justification. They are also required to monitor and evaluate the work performed and the material produced.

8-00-20 DEFINITIONS

For the purposes of this chapter, a public affairs services contract is a legal agreement to expend HHS funds for the procurement of public affairs products or services other than publications, audiovisuals and exhibits.

A campaign developed under contract should be submitted to OASPA for review using Form 524-B even though it includes print or audiovisual materials such as radio and television public service announcements.

Subsequently, as individual print and audiovisual products are developed they should be cleared using the appropriate review procedures set forth in Chapters 5 and 6.

Following are examples of the kinds of materials and services requiring review and approval if in excess of \$5,000:

- a. evaluations related to communications activities or programs;
- b. all aspects of nationwide media campaigns (including Advertising Council, Inc., or similar arrangements);

- c. still photography and other photo services;
- d. speech writing;
- e. public affairs consultation;
- f. communication research;
- g.** clipping services;
- h. public affairs indexes or polls; and
- i. clearinghouses and public inquiries operations.

8-00-25 USE OF MINORITY SMALL BUSINESS FIRMS

Departmental procurement regulations do not require price competition when only minority-operated small business firms are involved (in accordance with Section 8(a) of the Small Business Act of 1954, as amended). However; in an effort to encourage technical competition, offices seeking to contract with an "8(a)" firm must submit evidence that technical competition had in fact taken place.

Subject: RESPONSIBILITIES RE NEWS RELEASES, NEWS
CONFERENCES AND SECRETARY'S SPEECHES,
AND THE GREEN SHEET

9-00-00 Purpose
05 Scope
10 Operating Procedures and Guidelines

9-00-00 PURPOSE

To assure that news releases are accurate, complete and timely; that they meet high professional standards for quality and style; that they are utilized only for newsworthy announcements; that they reflect departmental policy; that they are coordinated and that appropriate officials are informed; that advance notice of plans and dates for news conferences and other news events is disseminated throughout the department; and that release schedules are appropriately programmed. To publish the Green Sheet.

9-00-05 SCOPE

To establish procedures for the review of all news releases and other materials developed for the media; and plans for all news conferences and other agency-initiated contacts with the media. To establish and maintain a production system for the daily publication of the Green Sheet.

9-00-10 OPERATING PROCEDURES AND GUIDELINES

A. News Releases

1. All departmental news releases must have appropriate Office of the Secretary and Staffing Division concurrence prior to release, as coordinated by OASPA, Departmental news releases are in effect announcements by the Secretary or Undersecretary concerning major appointments, policy, or matters of sufficient importance to justify release from the highest level in the Department. Other materials for media use, such as announcements of limited interest, appointments made by officers other than

the Secretary, background materials, interpretation of scientific and technical information, etc., may be released by the cognizant Operating Division or constituent agency as appropriate, but information copies of **all such** releases shall be transmitted promptly to OASPA. Similarly, a brief synopsis of all agency produced audiovisual news materials shall be transmitted promptly to OASPA.

2. Agency-level public affairs chiefs are responsible for assuring that proposed releases are cleared at appropriate levels for policy, accuracy and journalistic quality and for submission to OASPA of either draft releases or information copies as required.
3. OASPA will ensure that all departmental news releases are coordinated with the appropriate units of the Department. Agency public affairs chiefs are responsible for such coordination of other materials for release.
4. OASPA will process departmental news releases expeditiously and will inform the submitting office if there are problems that may cause a delay.

B. Press Conferences

1. Agency public affairs chiefs must receive advance approval from OASPA for all news conferences and news briefings involving more than one reporter.
2. OASPA will take responsibility for coordinating press conferences with the Office of the Secretary and other administrative units. When press briefings are a necessary part of a scheduled program activity (e.g., important public meetings, such as consensus conferences), the public affairs chief of the sponsoring agency is responsible for notifying OASPA at as early a time as possible of the planned press **activity**. When expected events result in the need for a press conference, the agency chief is responsible for securing prior oral approval from OASPA before scheduling such a conference. Exceptions may be required by extraordinary circumstances.

C. Secretary's Speeches (Refers to Chapter 14)

1. OASPA will be responsible for production of the Secretary's speeches and for distribution to the news media.
2. OASPA will also be responsible for coordination of all media activities in connection with the Secretary's speaking engagements, including news conferences and individual interviews.

D. Green Sheets

OASPA produces the Green Sheet, a publication containing clippings of news and items of HHS interest in the Washington papers as well as in other key dailies in major cities.

Subject: PUBLIC AFFAIRS STAFFING

10-00-00	Introduction
05	Responsibilities
10	Equal Opportunities
15	Merit Promotion Plan

10-00-00 INTRODUCTION

This chapter of the manual sets forth principles for selecting public affairs personnel.

10-00-05 RESPONSIBILITIES

- A. The selection of chief public affairs officers of the principal operating components, the regions and other chief public affairs personnel at the agency and sub-unit level is subject to the concurrence of the Assistant Secretary for Public Affairs. Selections of subordinate personnel do not require such concurrence.
- B. Public affairs chiefs will submit staffing reports and organization charts to OASPA on an annual Fiscal Year projected basis each October 1. The staffing report will contain all allocated positions by organization **and** sub-organization and indicate vacant positions and positions filled on an acting basis.
- c. OASPA will maintain files of applicants and will serve as a resource for public affairs recruitment.
- D. Public Affairs directors seeking recruiting assistance should send the position descriptions and vacancy announcements to OASPA.

10-00-10 EQUAL OPPORTUNITIES

Particular attention will be paid to the interests and advancement of minorities, handicapped persons and women.

10-00-15 MERIT PROMOTION PLAN

All recruitment, career development and advancement activities will be carried out within the provisions of the Merit Promotion Plan.

Subject: THE FREEDOM OF INFORMATION ACT

11-00-00 Scope
05 Policy
10 Responsibilities
15 Operating Guidelines
20 Relationship Between the FOIA and
the Privacy Act
25 Sanctions
30 Administrative Deadlines
35 Department-wide Schedule of Fees
40 Annual Report to Congress

11-00-00 SCOPE

This chapter sets forth the department's policies, practices, and procedures for implementing and administering the Freedom of Information Act (**FOIA**) as amended by P.L. **93-502**. Further guidance and details are contained in the department's implementing Public Information Regulation (45 CFR, Part **5**), as amended.

The Freedom of Information Act requires that all records and documents in the possession of federal agencies be made available upon request for inspection and/or copying unless the records or documents fall within one or more of the nine specific exemptions identified in the Act.

11-00-05 POLICY

The department's policy calls for the fullest responsible disclosure consistent with those requirements of confidentiality and administrative necessity which are recognized in the Freedom of Information Act. It is the -practice of the department, therefore, to make records available whenever it is possible to do so without violating the rights of individuals or organizations or impeding the department's ability to perform its functions.

The Act identifies nine specific exemptions which agencies may employ to withhold records.

11-00-10 RESPONSIBILITIES

The Assistant Secretary for Public Affairs is responsible for establishing departmental Freedom of Information Act policies, coordinating, monitoring, compiling reports to Congress, and providing training and technical assistance to Operating Divisions (OPDIVS).

The department's Freedom of Information Officer is responsible for recommending and implementing policies and procedures to ensure compliance with the requirements of the Act and coordinating consistent application throughout the department.

Previous guidelines in the Public Affairs Management Manual cited only those individuals who could deny requests for records, thereby giving the impression that anyone in the Department could release records. This policy has been revised so that only Freedom of Information Officers as listed below have the authority to release or deny records in response to FOIA requests and to charge, waive, or reduce fees for processing FOIA requests.

Freedom of Information Officers

HHS FOI Officer:	Director, FOIA/Privacy Act Division, OASPA
OHDS FOI Officer:	Director, Office of Public Affairs, OHDS
PHS FOI Officer:	Director, Office of Public Affairs, PHS
CDC FOI Officer:	Director, Office of Public Affairs, CDC
FDA FOI Officer:	Assistant Commissioner for Public Affairs, FDA
NIH FOI Officer:	Associate Director for Communications, NIH Communications, NIH

SSA FOI Officer:	Director, Office of Information, SSA
HCFA FOI Officer:	Director, Office of Public Affairs, HCFA

A decision by one of these officials to deny a request for records or to refuse to waive fees may be appealed to the appropriate review authority as listed below.

Review Authority

Assistant Secretary for HDS: reviews appeals of decisions of
OHDS FOI Officer

Assistant Secretary for Health: reviews appeals of decisions
of the PHS FOI Officer, the
CDC FOI Officer, the FDA FOI
Officer, and the NIH FOI
Officer.

Commissioner of Social Security: reviews appeals of
decisions of the SSA FOI
Officer.

Administrator, HCFA: reviews appeals of decisions of the
HCFA FOI Officer.

Assistant Secretary for Management and Budget: reviews
appeals concerning all other records
of the Department.

All decisions concerning appeals may be made only after consultation with the Office of General Counsel. Decisions on appeals also require the concurrence of the Assistant Secretary for Public Affairs. When one of the designated officials responds to an appeal, that decision constitutes final agency action on the FOIA request.

11-00-15 OPERATING GUIDELINES

A "Freedom of Information request" is any request for existing records, in the control, custody, or possession of the department. Some requests for records may also be "Privacy Act requests." (See Section 11-00-20) below). Requests for "information" (as distinguished from requests for "records") or requests for copies of publications and other information materials produced for public distribution are not "Freedom of Information requests" and should be handled in accordance with established procedures for responding to public inquiries.

Oral requests may be dealt with orally; but if the requester is dissatisfied with the disposition of an oral request, that person should be asked to put the request in writing so that a formal determination of the availability or nonavailability of the requested records can be made by the appropriate official (as listed in paragraph 11-00-10 of this chapter).

Even though requests for records do not make specific reference to the Freedom of Information Act of the department's Public Information Regulation, they must be treated as though they did. Search, review, and copying fees may be charged to the requester in accordance with the provisions set forth in the Public Information Regulation.

Releasing Records

If all records responding to the request are to be released, the FOI Officer will send one of the two copies provided by the program office to the requester, together with a letter that informs the requester that:

1. all records that fall within the scope of the request are enclosed (or will be sent at a later date;
2. no deletions have been made and no records withheld;

3. itemizes allowable charges;
4. either attaches an invoice for fees to be collected, or grants a reduction or waiver of the fees.

If a reasonable search fails to locate the records, the requester will be notified in writing. Such a notice does not constitute a denial of access to records.

Withholding Records

When any deletion is made from records that will be released, or when any record is withheld, the FOI Officer making that decision, will notify the requester in writing and

1. describe the deleted portions or withheld records in general terms only;
2. state the FOIA exemption and the provision of the Public Information Regulation that permits the withholding;
3. itemize allowable charges and either attach an invoice or grant a reduction or waiver of the fees;
4. explain the requester's right to appeal the decision not to comply fully with the request, and identify the official to whom the appeal should be sent;
5. maintain appropriate documentation of records or portions withheld in case of an appeal.

Appeals

In the event of an appeal, the appropriate review official will:

1. obtain the records from the FOI Officer;
2. conduct an independent evaluation of the initial determination;

3. consult with the Office of General Counsel and obtain concurrence of the Assistant Secretary for Public Affairs;
4. notify the requester of this final agency decision and the right to seek judicial review;
5. prepare a description of any records that are to be denied on appeal in sufficient detail to apprise the requester of the nature of the documents denied, if adequate explanation has not already been provided;
6. maintain appropriate documentation concerning the disposition of appeals.

(GSA regulations require **FOI** appeals files to be maintained for four (4) years after final determination by the agency, or three (3) years after final adjudication by **courts**, whichever is later).

11-00-20 RELATIONSHIP BETWEEN THE FOIA AND THE PRIVACY
ACT

The FOIA applies to all requests for records whether or not the records are maintained in a designated Privacy Act System of Records.

The Privacy Act gives individuals the right of access to most records about themselves that are in a designated Privacy Act System of Records.

If an individual requests access to a record concerning himself, retrieved by his/her name or personal identifier, and contained in a designated Privacy Act System of Records, the HHS employee receiving the request should mark it "PRIVACY ACT REQUEST" and route it without delay to the appropriate responsible department official, as identified in the System's notice.

If a requester requests records concerning an individual other than himself and the records are contained in a designated Privacy Act System of Records, the request constitutes an FOI Request. Unless disclosure is required by the FOIA, the Privacy Act prohibits disclosure of the records. The FOIA requires disclosure of records in a designated Privacy Act System of Records to a third party who requests them unless FOIA's Exemption 6 applies because "disclosure would constitute a clearly unwarranted invasion of personal privacy," or if any other FOIA exemption applies.

If a requester mislabels a request, mistakenly saying it falls under one Act rather than the other, we will place it in the proper channels, and, in any event, we will apply the Act that provides the most information.

11-00-25 SANCTIONS

The 1974 Amendments to the Freedom of Information Act empower a District Court to hear Freedom of Information cases and to determine whether or not an agency's personnel acted arbitrarily or capriciously in withholding requested records. If the court so finds, the Office of Special Counsel must initiate a proceeding promptly to determine whether **disciplinary** action is warranted against the responsible official(s) or employee(s). The Special Counsel's findings and recommendations are to be submitted to the appropriate administrative authority of the agency and to the responsible official or employee. The administrative authority shall take the disciplinary action recommended by the Special Counsel.

11-00-30 ADMINISTRATIVE DEADLINES

Determinations on whether records are to be released or withheld must be made and the requester notified within 10 working days of the **date** of receipt in the responsible FOI office. Extensions of time will not normally be granted. However, the time limit may be extended by written notice to the requester for not longer than an additional 10 working days only in unusual circumstances. The term "unusual circumstances" includes the need:

1. to search for and collect the requested records from field facilities or other establishments that are separate from the office processing the request;
2. to search for, collect, and examine a voluminous amount of separate and distinct records which are involved in a single request;
3. for consultation which shall be conducted with all practicable speed with another office having a substantial interest in the determination of the request or among two or more components of the Agency having substantial subject-matter interest.

If such extension is required, the requester will be notified in writing with an explanation of why the extension was necessary and the date by which a determination will be made. Only the officials designated in Section 11-00-10 are authorized to extend the time limits on initial review.

Decisions on appeals must be transmitted in writing within 20 working days from receipt in the office of the appeal official. Extension of the time limit may be granted only for the number of days not used to extend the initial determination period up to a maximum of 10 days. Such extension may be granted only for the reasons previously stated.

Failure to meet either of these deadlines entitles the requester to consider his administrative remedies as exhausted and to seek immediate judicial review.

11-00-35 DEPARTMENT-WIDE SCHEDULE OF FEES

A detailed schedule of fees for processing FOIA requests is set forth in the Public Information Regulation 45 CFR Subpart E. The officials responsible for making initial determinations as shown in Section 11-00-10 shall also determine whether fees are to be charged or waived in responding to requests for records. If a fee is to be assessed, the responsible FOI Officer will determine the

actual or estimated charge for providing the record to the requester. There is no charge for processing an FOIA request when the cost of collection would exceed the amount of the fee.

The Anti-Drug Abuse Act of 1986 amended the Freedom of Information Act by establishing three categories of requesters and the incremental charges that can be assessed against them:

- (1) fees **are** limited to reasonable standard charges for document search, duplication and review when records are requested for commercial use;
- (2) fees are limited to standard charges for document duplication only when the request is made by an educational or noncommercial scientific institution whose purpose is scholarly or scientific research; or a representative of the news media; and
- (3) for any request not described in (1) and (2) above, fees are limited to reasonable standard charges for document search and duplication.

Documents must be provided without charge or at a reduced charge if disclosure of the information is in the public interest because it is likely to contribute **significantly to** public understanding of the operations or activities of the Department and is not primarily in the commercial interest of the requester.

Fee schedules are limited to only the direct costs of search, review and duplication. Review costs are limited to time spent during the initial examination of a document to determine whether the document must be disclosed. Review costs cannot include time spent in resolving issues of law or policy.

No fee may be charged to requesters in the subsections (2) and (3) above

- o if the cost of routine **collection** and processing of the fee are likely to equal or exceed the amount of the fee; or

- o for any requester described in (2) and (3) above for the first two hours of search or for the first one hundred pages of duplication.
- o Advance payment may not be required of a requester unless the requester has failed to pay fees for an earlier request or the FOI Officer has determined that the fee will exceed \$250.

Fees will be paid by check or money order payable to "U.S. Department of Health and Human Services" or to the unit stated in the billing and will be sent to the billing unit.

Requesters who have been denied a fee waiver or reduction may appeal to one of the reviewing authorities specified in 11-00-10.

11-00-40 ANNUAL REPORT TO CONGRESS

The 1974 amendments to the Freedom of Information Act require that the department submit an annual report on or before March 1 of each calendar year to the Speaker of the House and to the President of the Senate for referral to the appropriate committees of the Congress. The report should include:

1. the number of determinations not to comply with requests for records and the reasons for each determination;
2. the number of appeals and the reason for the action taken on each appeal that **results** in a denial of information;
3. the names and titles or positions of each person responsible for the denial of records requested under this section and the number of instances of participation for each;

4. the result of each proceeding involving the sanction provision of the 1974 amendments, including a report of the disciplinary action taken against the officer or employee who was primarily responsible for improperly withholding records, or an explanation of why disciplinary action was not taken;
5. a copy of every rule made in connection with the Freedom of Information Act;
6. a copy of the fee schedule and the total amount of fees collected for making records available;
7. such other information as indicates efforts to properly administer the Freedom of Information Act. The Department's Freedom of Information Officer will coordinate the compilation of data to be included in the department's annual report to Congress and will issue instructions to public affairs officials on format and procedures.

Each FOIA official responsible for making initial determinations on Freedom of Information requests will **complete** and forward to the Department Freedom of Information Officer on an annual basis a Freedom of Information Act Report. Individual report forms are required to be filed in every instance of a denial or partial denial of records for which a written request has been made.

Subject: PRIVACY ACT - BASIC REQUIREMENTS AND
RELATIONSHIPS

12-00-00	Purpose'
05	Policy
10	Scope and Applicability
15	Legal Authority and Other Privacy Act Related Issuances
20	Organization for Administration of the Privacy Act Within HHS
25	Basic Requirements of the Privacy Act
30	Criminal Penalties
35	Civil Remedies
40	The Relationship Between the Privacy Act and the Freedom of Information Act

12-00-00 PURPOSE

The Privacy Act of 1974 affects ways in which the department and its employees collect, maintain, use and disseminate information concerning individuals. The prime **purpose** of the Act is to safeguard individual privacy by limiting and controlling the use of information the federal agencies collect and maintain on individuals and by providing individuals access to, and the right to amend, records that federal agencies maintain on them. This chapter describes the general framework of responsibility and organization for carrying out these policies, practices and procedures. It also summarizes the basic responsibilities of the Act.

12-00-05 POLICY

It is department policy to protect the privacy of individuals while permitting the exchange of records required to perform the department's administrative and programmatic functions and its responsibilities for disclosing records under the Freedom of Information Act.

12-00-10 SCOPE AND APPLICABILITY

This chapter applies to any group of records under the control of the department from which data on a subject individual are retrieved by a personal identifier assigned to the individual (system of records). The identifier may be the name of the subject individual, a number, a symbol or any other specific retriever assigned to such individual.

12-00-15 LEGAL AUTHORITY AND OTHER PRIVACY ACT RELATED
ISSUANCES

The provisions of this chapter should be used in conjunction with other Privacy Act issuances including but not limited to the following:

- A. Public Law 93-579, known as the Privacy Act of 1974, primarily Sections 3 and 7 of the Act. Section 3 of the Act is codified in the United States Code, Title 5, Section 552a, Records Maintained on Individuals (5 USC 552a). Section 7 related to the disclosure of social security account numbers.
- B. OMB Circular No. A-130: Management of Federal Information Resources. (Particularly Appendix I - Federal Agency Responsibilities for Maintaining Records About Individuals.)
- C. OMB Privacy Act Guidelines, Implementation of Section 552a of Title 5 of the United States Code.
- D. Department Regulation on the Privacy Act, published in the Code of Federal Regulations, Title 45, Part 5b (45 CFR 5b).
- E. OMB Guidelines for the Conduct of Matching Programs (OMB Computer Matching Guidelines).
- F. Department Procurement Regulations, section on Protection of the Privacy of Individuals. (48 CFR 324.1).

- G. General Administration Manual Chapter 45-13,
Safeguarding Records Contained in Systems of Records.
- H. Department Information Resources Management Manual,
Part 6, Automated Information System Security.

Additional and more specific instructions for carrying out the provisions of the Privacy Act are located in other issuances including memoranda and manuals of the HHS Staff Manual System, such as the Personnel Manual. Whenever HHS employees have questions about the Privacy Act they should consult with their Privacy Act Officers/Coordinators. Their legal questions should be brought to the attention of the Office of the General Counsel. Likewise, questions on privacy materials located in HHS staff manuals (e.g., personnel, ADP, procurement, records management, etc.), should be directed to the responsible HHS staff office.

12-00-20 ORGANIZATION FOR ADMINISTRATION OF THE PRIVACY
ACT WITHIN HHS

Within HHS, the Secretary has charged the Assistant Secretary for Public Affairs with the general responsibility for Department-wide implementation and administration of the Privacy Act; the head of each operating division (OPDIV), each regional office and each principal OS staff division (STAFFDIV) has more specific responsibility for the implementation, administration and operation of the Act within his or her organization. The Secretary has, however, retained approval authority for granting exemptions to Privacy Act requirements through the rule-making procedure. .

In providing policy guidance, technical assistance and general oversight, the Assistant Secretary is assisted by the department's Privacy Act Officer who serves as the focal point at the departmental level for policy development and coordination of department activities under the Act. Likewise, each OPDIV head, each regional director, and each principal OS staff division designates a Privacy Act Officer/Coordinator with staff as appropriate who serves in

a similar capacity at the OPDIV, regional, or OS staff division level. Each OPDIV may establish similar positions at subordinate organizational levels as such action ensures more effective compliance with the Act. At each level, the Privacy Act Officer/Coordinator receives technical assistance from staff assistants who are specialists in legal affairs, records management, reports clearance, forms management, **AIS** security, procurement and related support functions.

Finally, a system manager(s) who must be a department employee is designated for each system of records maintained by the department. This department official is responsible for the application of approved policies, practices, and procedures for the system of records and, when appropriate, for the recommendation and implementation of additional policies, practices, and procedures to cover special conditions or situations that may arise within the system of records. If a system of records is relatively small and located in one place, the system manager ordinarily controls access to the records. But if the system is large or located in more than one location, the system manager may rely on other responsible department officials to control access to the records. Also, if it wishes, a component or office may centralize in one focal point the control and access to its systems of records. Exactly how a system of records is administered is published in the Federal Register for each system.

12-00-25 BASIC REQUIREMENTS OF THE PRIVACY ACT

A summary of the basic requirements of the Privacy Act follows:

- A. Each system of records maintained by the department must be identified, and a notice on the system must be published in the Federal Register.

- B. Each time a new system of records is created, or major alterations are made to an existing system, the department must send a report of such to the Congress and OMB. This must include a computer matching report when required by the OMB Computer Matching Guidelines. In addition, a notice about the system must be published in the Federal Register.
- c. Each year the department must submit to OMB a report of its activities under the Privacy Act.
- D. When the department collects information from an individual that pertains to the individual for a system of records or requests an individual to provide his or her social security account number, it must tell the individual its legal authority for collecting the information, whether disclosure of such information by the individual is mandatory or voluntary, the principal purpose(s) and routine uses for which the information will be used and disclosed, and the effect on the individual if the individual does not provide the information.
- E. Information about an individual should be collected from that individual to the greatest extent practicable if it is used to make decisions with respect to the individual's rights, benefits and privileges under Federal programs.
- F. The information that the department collects and maintains about individuals must be relevant and necessary to the accomplishment of the Department's legally assigned functions.
- G. The records that the department maintains in its **systems** of records must be kept accurate, relevant, timely and complete to assure fairness to the individual.

- H. The department, upon request from a subject individual, must notify the subject individual that it is maintaining **a record** on him or her in the specific system of records identified in the request unless the system is exempt from this provision. The department also must grant the individual access to the record unless it has officially declared the record or parts of it to be exempt from such access.

In addition, it must amend such record whenever the subject individual proves that the record is not accurate, relevant, timely or complete: or it must inform the individual of its refusal to amend such record and advise him or her of appeal rights.

- I. The department may disclose information from records maintained in systems of records to individuals and parties specified in Section 5 USC **552a(b)** of the Act and when written permission to make disclosure is received from individuals to whom the records pertain. Any other disclosure of records is unauthorized and thereby unlawful.
- J. The department must keep an accounting of all disclosures of information from systems of records except those to personnel within the agency who have an **official** need to know or to the public under the Freedom of Information Act and make that accounting available to the subject individual. Each such accounting must include the date, nature, and purpose of the disclosure, as well as the name and address of the person or agency to whom the disclosure is made, and it must be retained for the life of the record, or for five years after disclosure, whichever is longer.
- K. Training must be given to all department personnel who are involved in maintaining records to apprise them of their responsibilities under the Act and to indoctrinate them with respect to procedures and rules of conduct established to implement the Act.

- L. A program for periodically reviewing department **record-**keeping policies and practices to assure compliance with the Act must be established.
- M. The department may not deny an individual any right, benefit or privilege provided by law because an individual refuses to give his or her social security number. There are two exceptions when:
 - 1. there is a federal statute requiring an individual to give his or her number; and
 - 2. when the following conditions existed prior to January 1, 1975:
 - a. the department maintained a system of records in connection with the rights, benefits or privileges; and
 - b. the department, under a statute or regulation, required individuals to give their numbers to prove their identities. "Regulations" include executive orders, rules, statements of policy, staff manuals and staff instructions. Requirement "under a statute" or regulation includes a requirement by a department official when a statute or regulation allows the official to establish that requirement.
- N. The department must review all agency contracts which provide for the maintenance of systems of records by or on behalf of the agency to accomplish an agency function to assure that, where appropriate and within the agency's authority, language is included which provides that such systems will be maintained in a manner consistent with the Act.
- O. The department must maintain no record describing how an individual exercises his or her first amendment rights unless authorized by statute or the **individual** or unless relevant to and within the scope of an authorized law enforcement activity.

- P. The department must make reasonable efforts to serve notice on an individual when any record on such individual is made available to any person under compulsory legal process when such process becomes a matter of public record.
- Q. The department must publish rules describing agency procedures developed pursuant to the Act and describing any systems which are proposed to be exempt from provisions of the Act including the reasons for the proposed exemption.
- R. The department must refrain from renting or selling lists of names and addresses unless specifically authorized by law.
- S. The department must inform prior recipients of a record when a record is amended pursuant to the request of an individual or a statement of disagreement has been filed, and advise any subsequent recipient that a record is disputed and provide a copy of the statement of disagreement to both prior and **subsequent** recipients of the disputed information.

12-00-35 CRIMINAL PENALTIES

The Privacy Act imposes criminal penalties directly on individuals if they knowingly and willfully violate certain provisions of the Act. Any federal agency employee, for instance, is subject to a misdemeanor charge and a fine of not more than \$5,000 whenever such employee:

- A. discloses records in a system of records to any person or agency not entitled to such records;
- B. maintains a system of records without publishing the prescribed public notice on the system in the Federal Register; and
- C. requests or obtains any record from any system of records under false pretenses. (This provision applies to any person, not just to federal employees.)

All HHS employees, especially those who work with a system of records, should be made fully aware of these conditions and their corresponding penalties.

12-00-35 CIVIL REMEDIES

The civil remedies include a variety of court actions which individuals may take against the department whenever it fails to comply with the Act by actions such as the following:

- A. refusing to comply with an individual's request for access to his or her record;
- B. failing to maintain a record concerning an individual with such accuracy, relevance, timeliness and completeness as is necessary to assure fairness in any decision relating to an individual's rights, benefits or privileges when that decision is made on the basis of an improperly maintained record; and
- C. failing to comply with the provisions of the Act or any rule promulgated thereunder in a manner which has an adverse effect on an individual.

12-00-40 THE RELATIONSHIP BETWEEN THE PRIVACY ACT AND THE
FREEDOM OF INFORMATION ACT

See 11-00-20.

Subject: OVERSIGHT OF HHS CLEARINGHOUSES AND INFORMATION
CENTERS

13-00-00 Purpose.
05 Scope
10 Responsibilities
15 Operational Reporting
20 Operational Evaluation
25 Approval of contracts

13-00-00 PURPOSE

This chapter establishes policies and procedures for the oversight of HHS clearinghouses and information centers. It sets forth procedures for reviewing and approving contracts for operating departmental clearinghouses and information centers and contracts for clearinghouse research; establishes policies and procedures for ongoing evaluation of the operating efficiency of departmental clearinghouses and information centers, conformance with policy guidelines and effectiveness in providing meaningful services to information requesters. OASPA's oversight functions are directed to assuring conformance with the department's communications plans, policies and regulations established by congress, the department and the Office of Management and Budget.

13-00-05 SCOPE

The requirements of this chapter apply to all clearinghouses and information centers that are financed in whole or in part by departmental funds, including those operated for interagency and intergovernmental purposes.

13-00-10 RESPONSIBILITIES

OASPA management responsibilities include oversight of all HHS clearinghouses and information centers in compliance with direction from the Office of Management and Budget and established department delegation of authority. These responsibilities are exercised through regular collection of financial, performance and staffing information; review of annual operating plans; evaluation of the effectiveness of clearinghouses and information centers; approval of Requests for Contracts (RFC's) for operating clearinghouses and information centers; and approval of RFC's for conducting research on clearinghouses and information centers.

13-00-15 OPERATIONAL REPORTING

The Office of Management and Budget directed HHS to exercise oversight over all departmental clearinghouses and information centers. Authority for oversight was delegated to the Office of the Assistant Secretary for Public Affairs (OASPA) as a result of OMB Memo 81-14. Key oversight objectives include minimizing cost to the government, assuring efficient clearinghouse operations, recovering cost where appropriate and reducing the level of low-priority services.

Oversight implementation by OASPA will include periodic calls for operational information from each departmental clearinghouse. An example of the information call appears as Appendix A to this chapter.

13-00-20 OPERATIONAL EVALUATION

Information collected periodically as indicated in Appendix A will form the basis for comparisons among HHS clearinghouses. Following are examples of the kinds of comparisons to be made:

- a) the range of services provided;
- b) dollar amounts of cost recovery;

- c) unit costs of providing service to the public; and,
- d) distribution of expenses between essential and optional services.

As needed, results from the information call will be supplemented by information collected through **on-site** visits and ad hoc operational studies.

13-00-25 APPROVAL OF REQUESTS FOR CONTRACTS

Requests for contracts to operate HHS clearinghouses **must** be approved by the initiating office and the OPDIV public affairs officer prior to submission to the HHS Assistant Secretary for Public Affairs. The approval document is HEW 524-B.

A. Requests for Contracts to Operate Clearinghouses

In general, the OASPA review emphasis is upon assuring that:

- a) tasks are sufficiently specified;
- b) tasks to be performed are essential to properly serve the public;
- c) the estimated contract cost is commensurate with the work that is to be performed;
- d) the work being proposed **is** not being duplicated elsewhere; **and**,
- e) OMB, departmental and congressional interests are properly served.

B. Requests for Contracts for Clearinghouse Research

In general, the OASPA review emphasis is upon assuring that:

- a) the research question(s) to be answered are substantive and the answers will contribute to greater departmental effectiveness;

- b) the research design **is** professionally sound;
- c) the research plan is feasible and complete; and,
- d) thorough background work has been completed and the proposed research will not duplicate findings that can readily be predicted on the basis of the results of past research.

APPENDIX A

8/26/86

Information Center Data Summary

HHS Operating Division _____ Fiscal Year _____

Clearinghouse Name and Address _____

Contractor Operated _____ Overhead Rate _____

Type of Contract: 8A SBA Open Competition

Government Operated _____

Annual Budget _____ PTE _____

Contact Person _____ Phone _____

<u>(A)</u> Clearinghouse Function	<u>(B)</u> Number of Units	<u>(C)</u> Contract cost	<u>(D)</u> Government cost
---	----------------------------------	--------------------------------	----------------------------------

1. Acquisition of
published information.

1a. Total items acquired _____

2. Preparing abstracts of
acquired information.

2a. Total abstracts _____

2b. Ave. abstract length _____

2c. Total cost of
abstract preparation _____

3. Adding abstracts to the
ADP data base.

3a. Total abstracts added _____

3b. Total cost of adding
abstracts to ADP _____

(Actual Size 8½" x 11")

<u>(A)</u> Clearinghouse Function	<u>(B)</u> Number of Units	<u>(C)</u> Contract cost	<u>(D)</u> Government cost
4. Responding to routine requests.			
4a. Total routine requests	_____		
4b. Total response cost		_____	_____
4c. Total labor hours	_____		
5. Responding to special requests.			
5a. Total special requests	_____		
5b. Total response cost		_____	
5c. Total labor hours	_____		
6. Preparing and staffing exhibits.			
6a. Total number of exhibits	_____		
6b. In an attached narrative, explain the tangible benefits that are expected by providing exhibits. If an increased number of requests to the clearinghouse is expected, then show what that number is and how it was arrived at. If increased cost recovery is expected, then indicate the projected additional dollar value of revenues.			
6c. Total labor cost		_____	
6d. Materials cost		_____	
7. Developing publications, posters and other printed materials, other than routine notices of new acquisition.			
7a. Total Publications developed.	_____		

(A) Clearinghouse Function	(B) Number of Units	(C) Contract cost	(D) Government cost
7b. Total pages	_____		
7c. Total labor hours	_____		
7d. Total labor cost		_____	
7e. Total materials cost		_____	
8. Publications distributed by mailing List.			
8a. Number of copies dist. by mailing list	_____		
8b. Pieces of mail f sent annually.	_____		
8c. Total cost of mailing list distribution		_____	
9. Outreach.			
9a. <u>Number of guest speaking engagements</u>	_____		
9b. Total cost		_____	
9c. Total labor hours	_____		
9d. <u>Conferences convened</u>	_____		
9e. Total cost		_____	
9f. Total labor hours	_____		
9g. <u>Total site visits</u> (e.g., schools)	_____		
9h. Total cost		_____	
9j. Total labor hours	_____		
10. Advisory groups			
10a. Private members		_____	
10b. Government members		_____	

(A) Clearinghouse Function	(B) Number of Units	(C) Contract Cost	(D) Government Cost
10c. Sessions convened	_____		
10d. Total COAt		_____	
10e. Travel/per diem	_____		
tot. Honoraria	_____		
11. Referrals			
11a. Number	_____		
11b. Total labor hours	_____		
11c. Total cost		_____	
12. Management reports			
12a. Total labor hours	_____		
12b. Total cost		_____	
13. Quality control			
13a. Total labor hours	_____		
13b. Total cost		_____	
14. ANNUAL TOTALS			
14a. TOTAL LABOR HOURS	_____		
14b. TOTAL COST		_____	_____

7/02/86

Data Summary Definitions

COLUMN HEADINGS

Clearinghouse Function (Col. A): converts clearinghouse functions into units of production input and output.

Number of Units (Col. B): recorded counts of production input used during the reporting period and counts of the outputs produced.

Contract Cost (Col. C): contractor billings for labor and materials.

Government Cost (Col. D): direct cost to the government for labor and materials required to maintain the clearinghouse services. These charges are above and beyond the cost of contractor services.

GENERAL DEFINITIONS

Total Cost: the sum of Direct Cost and Indirect Cost.

Direct Cost: costs of labor and material that can be traced to the volume of production of a particular product or service. Examples include cost accounting items such as: paper for responding to inquiries, labor time for preparing abstracts, computer line and core charges. 'Direct cost' in business terminology is roughly equivalent to 'variable cost' in economics terms.

Indirect Cost: cost that is spread over the production of a collection of products or services, but cannot be uniquely identified with any one of the products or accurately apportioned among them individually. Examples include cost accounting items such as: rent, utilities, employee fringe benefits, personnel administration. 'Indirect cost' in business terminology is roughly equivalent to 'fixed cost' in economics terms.

Overhead Cost: an amount added by the contractor to the actual costs of task performance under the scope of work. It includes the contractor's cost of doing business, such as preparation of proposals, office rent and utilities, personnel costs attributable to labor turnover, labor training.

Grand Total Contractor Cost: the sum of all unduplicated contractor costs in Column (C) of the Information Data Summary form. The Grand Total Contractor Cost should be less-than or equal-to the negotiated annual contract price.

Any difference between annual contract cost and the sum of the unduplicated functional costs is reconciled in the last item of the summary: functions 'Not elsewhere classified.' Part of the reconciliation will include the difference in cost between 'hours paid' and 'hours worked.' Another part will reflect the cost of performing tasks that have not been specified in the functional breakdown. The proportion of the contract cost reflected in the 'Not elsewhere classified' entry will be an indication of whether more functions need to be added to the data summary.

Hours Paid: the full-time-equivalent is 2080 hours per year. Hours paid includes hours worked plus vacation and other leave time. Hours paid can never be greater than hours worked.

Hours Worked: time charged according to the normal work day. The time may be charged variously as 'direct labor' or 'indirect labor' in the same sense as direct and indirect cost

Government Cost: direct costs incurred by the government in addition to the contract cost. Examples include costs incurred for supervision, reviewing reports, evaluating contractor performance.

8/26/86

Information Center Data Summary

***ALL COSTS INCLUDE OVERHEAD.**

***ALL LABOR TIME INCLUDES ALLOCATED OVERHEAD TIME.**

Description of Data Reporting entries:

1. Acquisition of published information

1a. Total items acquired: count all published items that are to be screened for potential addition to the data base. Cost covers searches, requests for literature, incoming logs and cataloging. Contract cost includes direct cost plus allocated overhead cost. Cost to the government includes direct costs only (for the time being).

2. Preparing abstracts of acquired information

2a. Total abstracts: total documents from [1a] abstracted.

2b. Ave. abstract length: average number of words per abstract.

2c. Total cost of abstract preparation: contract cost includes direct cost plus allocated overhead cost. Government cost includes direct cost only (for the time being).

3. Adding abstracts to the ADP data base.

3a. Total abstracts added: (self-explanatory)

3b. Total cost of adding abstracts to the data base: contract cost includes ADP charges plus overhead.

4. Responding to routine requests

4a. Total number of routine requests: mail and telephone. (a routine request is one requiring no more than a stock reply and/or standard informational materials from ready stock.)

4b. Total processing cost: include all direct and indirect costs, contractor and government, from incoming request through outgoing response.

4c. Total labor hours: include work-day hours for processing routine requests. Exclude allocated vacation, leave, holiday and other paid, but not worked time.

5. Responding to special requests

5a. Total number of special requests: mail and telephone.

5b. Total **processing cost: (same as [4b], with additional processing steps including data base searches, program referrals, bibliographic preparation and tailored letters.)**

5c. Total labor hours: (same as [4b])

6. Preparing and staffing exhibits.

6a. Total number of exhibits prepared during the reporting period.

6b. Total labor hours: contractor **and** subcontractor time expended for exhibit preparation **and** staffing. Include allocated overhead hours.

6c. Total labor cost: direct and indirect cost, including overhead. segregate contract cost from other government cost.

6d. Materials cost: contractor cost of purchased materials segregated from the cost of government-provided materials.

7. Developing publications, posters and other printed materials, other **than** routine notices of new acquisitions.

7a. Total publications: number of publications produced either by the clearinghouse staff or subcontractors. Include publications developed **by** government program staff or program **contractors** for any publications produced primarily for distribution through the clearinghouse. Count posters as one-page publications.

7b. Total pages: count each printed side as one page.

7c. Total labor hours: total contractor and subcontractor labor time expended for publications development. Include allocated overhead time.

7d. Total **labor cost**: direct and indirect labor costs including overhead and subcontractor labor cost. Segregate contractor costs from government costs.

7e. Total **materials cost**: cost of purchased materials, **contractor/subcontractor** costs segregated from government costs.

***8. Publications distribution by mailists**

8a. Number of copies of publications distributed by mailing lists.

8b. Annual number of mailing list mailings.

8c. Total cost of distributing publications through mailing lists. Segregate contractor costs from government cost. Include direct and indirect costs and overhead. Include the cost of mailing list maintenance.

9. Outreach.

9a. Number of **guest** speaking engagements completed for the reporting period.

9b. Total cost of providing guest speakers: include preparation cost, all direct and indirect costs and overhead. Segregate contractor/subcontractor costs from government direct costs.

9c. Total labor hours: include work-day hours for preparation and presentation. Include allocated overhead time. Segregate contractor and government work-day hours expended.

9d. Conferences convened: [see (9a)]

9e. Total cost: [see (9b)]

9f. Total labor hours: [see (9c)]

9g. Total site visits (e.g., schools) for the reporting period.

9h. Total cost: [see (9b)]

9j. Total labor hours: [see (9c)]

10. Clearinghouse advisory groups

10a. Private members: number of member's.

10b. Government members: number of members.

10c. Sessions convened for this reporting period.

10d. Total cost: [see (9b)]

10e. Travel/per diem: expenses paid to advisory group members.

10f. Honoraria: compensation paid to advisory group members.

11. Referrals of inquiries for response or service by individuals or organizations outside of the clearinghouse.

11a. Number of referrals for this reporting period.

11b. Total labor hours: count work-day labor hours expended in referral processing. Include allocated **overhead** time. Segregate contractor and government staff time. Do **not** include time expended by the organization responding to the referral;

11c. Total cost of processing referrals: [see (9b)]. Exclude cost incurred by the responding organization.

12. Management reports: clearinghouse reports to government managers.

12a. Total labor hours:

Contractor time: reports to project **officer**.

Government time: project officer **reports** to higher levels of government management.

12b. Total cost of producing management reports: [see (9b)]

13. Quality control to maintain government contract standards.

13a. Total labor hours: total contractor/subcontractor work-day time, including allocated overhead time.

13b. Total cost: [see (9b)]

14. ANNUAL TOTALS

14a. **TOTAL LABOR HOURS**: total hours paid for all clearinghouse activities. Include all contractor/subcontractor overhead hours paid. Show government labor hours separately.

14b. **TOTAL COST**: include all clearinghouse costs, including overhead. Show government cost separately.

Subject: SECRETARY'S SPEECHWRITING OPERATION

14-00-00 Purpose.
05 Scope
10 Operating Procedures and Guidelines

14-00-00 PURPOSE

The purpose of the Secretary's speechwriting office is to serve the Secretary, the Under Secretary, and the Chief of Staff, and is under the direction of the Deputy Assistant Secretary for Public Affairs.

14-00-05 SCOPE

The responsibility of the Secretary's speechwriting office is to prepare speeches, op ed pieces, editorials, certain Congressional testimony and public documents -- except for Press Conferences.

14-00-10 OPERATING PROCEDURES AND GUIDELINES

All requests for byline articles or editorials written by any of the above should be directed to the Deputy Assistant Secretary for Public Affairs.

As part of the speech preparation process, speechwriters will send drafts of the Secretary's (or Under Secretary's, or Chief of Staff's) remarks to the heads of Operating Divisions for Departmental clearance. These memorandums will be sent to the Op Div heads from the Deputy Assistant Secretary for Public Affairs and should be dealt with in a timely manner -- quickly being assigned to the appropriate staff person within the **OpDiv** for clearance.

The Secretary's speechwriting office, as standard operating procedure, gives the **OpDivs** 24 hours (one working day) to respond to requests for input on Secretarial speeches. Time constraints often prevent a longer turn-around period in the clearance process.



