



DEPARTMENT OF THE ARMY
U.S. ARMY RECORDS MANAGEMENT AND DECLASSIFICATION AGENCY
7701 TELEGRAPH ROAD
ALEXANDRIA, VA 22315

AHRC-PDD-FP

18 May 2004

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Ensuring Quality of Information Disseminated to the Public

1. References:

a. Headquarters Department of the Army Letter 25-03-02, Ensuring Quality of Information Disseminated to the Public by the Department of Defense, 28 October 2003.

b. Memorandum, Deputy Secretary of Defense, SAIS-EIG, 10 February 2003, subject: Ensuring Quality of Information Disseminated to the Public by the Department of Defense.

c. Federal Register (Volume 67, Number 36, page 8452), Office of Management and Budget (OMB), 22 February 2002, subject: Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies (Final Guidelines).

2. Purpose. The requirements prescribed by the references above focus on the objectivity, utility, and integrity of information used and disseminated by Federal agencies and ensuring affected members of the public have an administrative mechanism to seek and obtain correction of information that does not meet quality standards. This memorandum addresses the Department of the Army standards of quality, pre-dissemination review of information, and administrative procedures for processing claims.

3. General. Information products are distributed in a variety of media and encompass the full spectrum of programs and areas of responsibilities. Each organization must ensure the standards, review procedures, and administrative mechanisms formally adopted not only address the objective of this program, but also incorporate requirements by other specific programs (i.e., National Environmental Policy Act, Government Performance and Results Act of 1993).

4. Quality Guidelines. "Quality" is defined as the encompassing term, of which "utility," "objectivity," and "integrity" are the constituents. The references above address the definition and criteria for each of these components. A synopsis of quality of information guidelines is accessible from the Department of the Army Freedom of Information and Privacy Office (DA FOI & P Office) web page at <https://www2.arims.army.mil>.

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5. Pre-dissemination Reviews. The intent of the Quality of Information Program is not to circumvent or supersede present procedures and business practices. However, activities must review existing quality assurance or control procedures, staffing practices and other administrative measures to ensure adherence to quality standards and include adequate documentation of pre-dissemination reviews.

a. Not all information products prepared by Department of the Army offices are distributed to the public. A list of the types of information not subject to the Quality of Information Program is assessable from the DA FOI & P Office web page at <https://www2.arims.army.mil>.

b. Agencies must allow "adequate" time for review, consistent with the standards required for the type of information to be disseminated.

(1) Informal and formal reviews will help ensure products meet a minimum level of quality.

(2) To ensure accuracy, objectivity, and integrity, products may undergo technical, supervisory, editorial, and legal review depending on the nature of the product. Reviews should be performed by several people with diverse areas of expertise appropriate for the type of information (i.e., independent subject matter expert, statistical expert, information technology, visual information specialist, and accessibility specialist).

(3) Treat information quality as an integral part to every step in the development of information, including creation, collection, maintenance, and dissemination. When appropriate, conduct reviews through the various stages of data development.

6. Administrative Procedures for Processing Claims. Refer to the matrix of actions at enclosure 1 and the guidelines at enclosure 2 for timelines, responsibilities, and requirements associated with processing claims.

7. Recordkeeping Requirements. Documentation is paramount and anticipated to play a major role in processing claims and appeals. It is imperative that activities create and maintain documentary evidence, which supports pre-dissemination reviews and decisions made in processing claims. Retention schedules for records supporting this program are in the development stage. In the interim, retain the documents, which support the pre-dissemination review and processing of claims (decisions made during the processing of claims, coordination, and actions taken as a result of processing claims,) in the current files area until retention schedules are published.

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8. Links of Interest. The documents identified in the references above are accessible via the Internet as shown below:

a. http://www.army.mil/usapa/epubs/pdf/l25_03_2.pdf - Headquarters Department of the Army Letter 25-03-02.

b. http://www.defenselink.mil/pubs/016_DEPSECDEFInfoQualMemo.html - Department of Defense Memorandum.

c. <http://www.whitehouse.gov/omb/fedreg/reproducible.html> - Office of Management and Budget guidance published in the Federal Register

9. The point of contact for this memorandum is Mr. Bruno C. Leuyer, Chief, Department of the Army Freedom of Information and Privacy Office, at Commercial (703) 428-6498, or (DSN) 328-6498.



STEVEN A. RAHO III
Director, Records Management
and Declassification Agency

2 Enclosures

1. Matrix
2. Administrative Procedures

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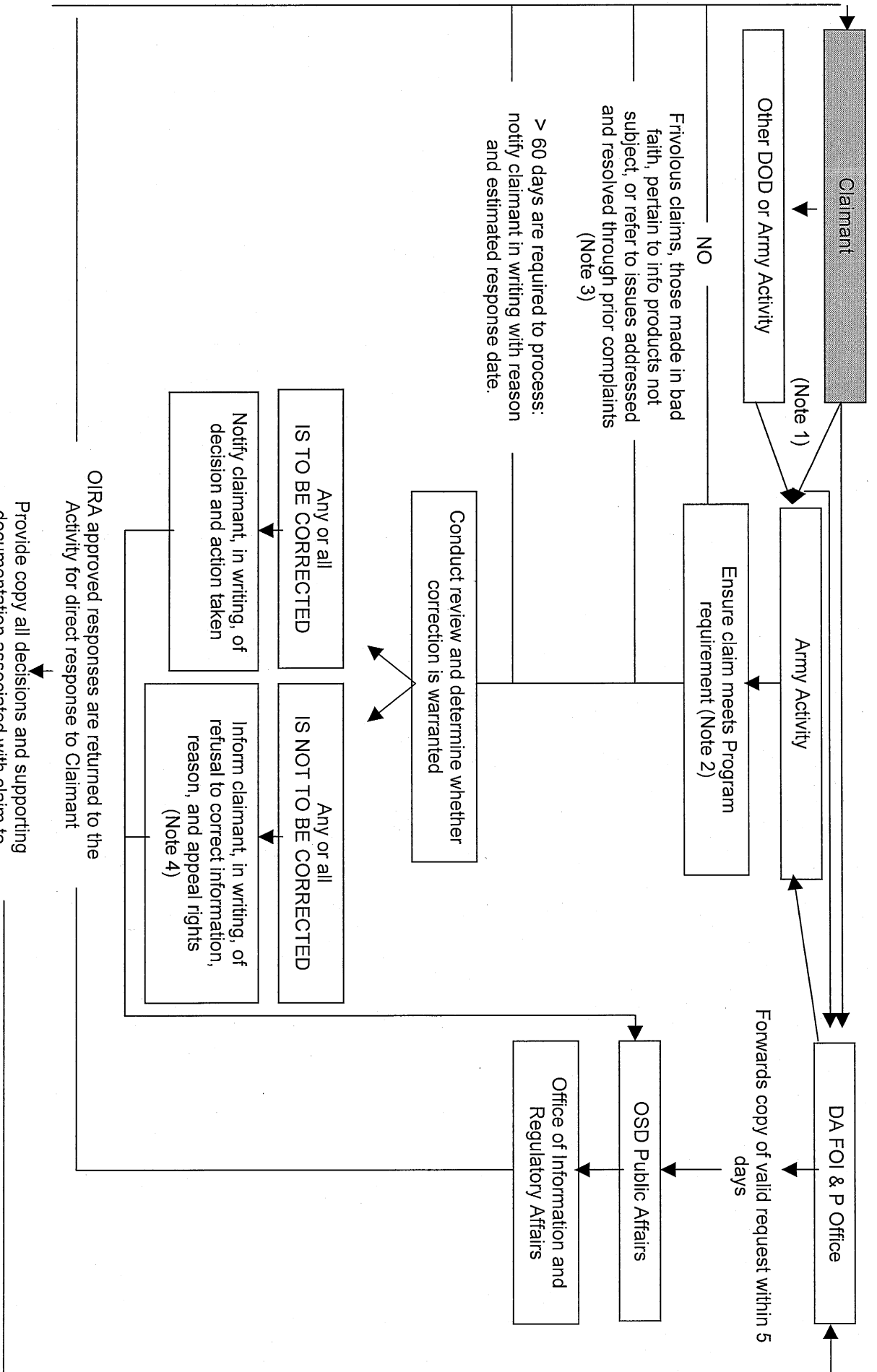
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Note 1: Claims received directly from affected persons or other DOD/Army activity must be faxed to DA FOI & P Office within 3 working days of receipt.
 Note 2: A list of elements each claim must contain is accessible from the DA FOI & P Office web page at <https://www2.airs.army.mil>
 Note 3: A list of documents not subject to the Quality of Information Program is accessible from the DA FOI & P Office web page at <https://www2.airs.army.mil>
 Note 4: Appeals must be submitted in writing within 30 working days and consists of: written justification to support appeal, reason why agency response is insufficient or inadequate, copy of information originally submitted and a copy of the Army Activity's response.

Administrative Procedures for Processing Claims Submitted Under the Quality of Information Program

1. Affected members of the public are encouraged to submitted Quality of Information (QI) Program claims to the QI designee within the Department of the Army Freedom of Information and Privacy Office (DA FOI & P Office). Activities receiving claims directly from the public must coordinate with the QI designee within the DA FOI & P Office via fax or telephonically within 5 working days of receipt of a QI claim (see paragraph 9 below for contact information).
2. The QI designee within the DA FOI & P Office will forward an a complete copy of requests through OSD Public Affairs to the Office of Information and Regulatory Affairs (OIRA) as well as to the Army activity responsible for the disseminated information in dispute within 7 working days of receipt.
3. Prior to processing the claim, the responsible activity for the information in question will:
 - a. Ensure claims meet the published program requirements and will contact the requester within 5 working days if the claim is incomplete or if the information disputed does not fall within the purview of the program. A detailed description of exempt information is listed at <https://www.rmda.belvoir.army.mil>.
 - b. Determine whether the requester has adequately supported the claim that the information is not accurate, clear, complete, or unbiased, and that the requester is an affected person. Afford the requester the opportunity to supplement the claim with additional information or justification. If the requester comes back and submits a completed QI claim, continued processing of the request will immediately resume.
4. The role of the responsible activity is to conduct a thorough review of the information being challenged, the processes used to create and disseminate the information, the conformity of the information, and its compliance with those processes as outlined in OMB's, DOD's, and Army's Quality of Information Guidelines. Limit the review of information to the aspect or aspects of the information that clearly bears on any determination to correct the information. These guidelines are found at <http://www.whitehouse.gov/omb/fedreg>, <http://www.army.mil/usapa>, and from the DA FOI & P Division web page at <https://www.rmda.belvoir.army.mil>.
 - a. All effort will be made to process the claim within 60 working days. If a claim requires more than 60 working days to resolve, the requester will be notified in writing (by the activity) that more time is required, the reason why, and an estimated response date.
 - b. Frivolous claims, those made in bad faith, pertain to information products not subject to Quality of Information guidelines, or refer to issues address and resolved through prior complaints will be dismissed.
 - c. After the review is completed, the responsible activity will determine whether a correction is warranted and, if so, what corrective action will occur. Responsible activities are required to undertake only the degree of correction that they conclude is appropriate for the nature and timeliness of the information involved. The content or status of information is not required to be changed, or in any way altered simply because a request is made. The responsible reviewing activity will take one of the following actions (also see paragraph 7 below):
 - (1) If any or all of the information is to be corrected, notify the requester, in writing, of the decision and either an issued correction, or of the intent to correct and proposed associated action.
 - (2) If there is disagreement with any or all of the claim, inform the requester in writing of the refusal to correct the information, the reason for refusal and the appeal procedures and requirements outlined below.

(a) If the requester disagrees with the activity's determination, an appeal may be submitted in writing within 30 working days of the notification of the determination.

(b) The appeal packet consists of: a written justification to support the case for appeal to include the reason why the agency response is insufficient or inadequate, a copy of the information originally submitted to support the correction claim, and a copy of the Army responsible activity's initial response.

(c) The requester must submit the appeal packets through the DA FOI & P Office.

5. The QI designee within the DA FOI & P Office will route all appeals through the responsible activity that provided the original determination prior to submission to the Army Appellate Authority within 3 working days of receipt. That organization will have the opportunity to reconsider the initial decision, address the justification submitted with the appeal packet, and contribute any additional documentation required for the Appellate to make a decision. The responsible activity will forward the appeal packet to the Army Appellate within 7 working days of receipt.

6. Appeal decisions will be made within 30 working days of receipt. If an appeal requires more than 30 working days, the requester will be notified in writing (by the Appellate office) that more time is required, the reason why, and an estimated response date.

7. Submit a copy of the draft response to claims or appeals to the Administrator of the Office of Information and Regulatory Affairs (OIRA) at least 7 working days before its intended issuance. The address is: Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street NW, New Executive Office Building, Room 10201, Washington, DC 20503. Army responsible activities shall not issue a response until OIRA has concluded consultation with the agency.

8. The responding activities, to include the Appellate, will provide a copy of all decisions and supporting documentation associated with claims to the Army QI designee for recordkeeping purposes and inclusion in the annual report submitted to the Assistant Secretary of Defense for Public Affairs.

9. Forward correspondence via mail: DA FOI & P Office, Quality of Information Program, 7701 Telegraph Road, Suite 144, Alexandria, VA 22315-3905, or fax Commercial: (703) 428-6522, DSN: 328-6522.