# **Guidelines for Ensuring the Quality** of Information Disseminated to the Public

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# I. Agency Mission

The Administration for Children and Families (ACF) is responsible for administering numerous federal programs: Temporary Assistance to Needy Families (TANF), child support, child care, Head Start, child welfare and other programs relating to children and families; services for those with developmental disabilities and mental retardation, refugee services, and Native American/Tribal programs. Actual services are provided by state, county, city, and tribal governments, and public and private local agencies. ACF assists these organizations through funding, policy direction, and information services.

# II. Scope and Applicability of Guidelines for Agency

ACF is committed to ensuring that disseminated information meets the standards of quality set forth in the OMB, HHS and ACF guidelines. It is ACF's policy to ensure and maximize the quality, objectivity, utility, and integrity of information that it disseminates to the public. We strive to provide information that is accurate, reliable, clear, complete, unbiased, and useful. We are committed to integrating the principle of information quality into every phase of information development, including creation, collection, maintenance, and dissemination.

The pre-dissemination review described in the guidelines applies to information disseminated on or after October 1, 2002. The administrative mechanism for correction applies to information that the agency disseminates on or after October 1, 2002, regardless of when the agency first disseminated the information. This section identifies the types of information covered by the Guidelines, and also lists the types of information that are exempt. ACF information subject to the Information Quality Guidelines includes:

- Statistical information;
- Studies and summaries prepared for public dissemination to inform the public about the impact of programs administered by the agency; and
- Studies and summaries prepared for use in formulating broad program policy.

The following types of information are not subject to the Information Quality Guidelines:

- Information relating to ACF programs, archival information, clearinghouses, and Internet distribution of studies, reports, documents, summaries, and articles not authored by the agency and not representing the agency's views, including materials authored and distributed by ACF grantees;
- Information limited in dissemination to government employees (intra- or interagency) or agency contractors

- or grantees;
- Information pertaining to basic agency operations or management information produced primarily for internal use;
- Procedural or policy manuals;
- Responses to requests for agency records under the Freedom of Information Act (FOIA), the Privacy Act, the Federal Advisory Committee Act, or other similar laws;
- Information relating solely to correspondence with individuals or persons; and
- Press releases that support the announcement or give public notice of information that ACF has disseminated elsewhere.

### III. Types of Information Disseminated by the Agency to the Public

Given the wide variety of programs administered by the Administration for Children and Families, and the numerous types of information generated by these programs, it is not possible to offer a comprehensive list of all dissemination activities conducted by the agency. Consequently, the following examples have been drawn selectively from a cross-section of ACF programs. However, it should be noted that not all of the information described below is subject to the OMB Guidelines.

A. Program Information -- descriptions of programs such as Head Start, child care, child welfare and youth services, child support enforcement, community services, Temporary Assistance for Needy Families (TANF), and low-income family assistance programs; budget and funding information; data on numbers and locales of grantees; types of services supported through agency programs; and other descriptive information. For example, the Children's Bureau makes available a variety of materials relating to basic program information. Fact sheets describing the purpose and funding level of each of the Children's Bureau's programs are available on the ACF web site. The Children's Bureau web site also has information of a general nature relating to child welfare, for instance, information on how to report child abuse and neglect or how to become a foster or adoptive parent.

Examples of information offered by a typical web site (Administration on Developmental Disabilities) to the public include: a home page; staff directory; calendar of major program events; a fact sheet; links to state-based grantees; updates on various major initiatives; links to national disability organizations and related disability sites; connectivity to the Developmental Disabilities Assistance and Bill of Rights Act of 2000, current regulations, program highlights and outcomes; and a section devoted to frequently asked questions, where the public can search for answers to their questions or email a question to the program staff.

The Family and Youth Services Bureau's (FYSB) National Clearinghouse on Families and Youth (NCFY) disseminates:

- The Exchange, a periodical focusing on issues of interest to youth service professionals;
- FYSB Update, a periodical sharing information about the Bureau's research and demonstration projects;
- Technical assistance publications, providing guidance about how to address specific policy or operational issues;
- Publications for young people, parents and community members (developed by FYSB and NCFY);
   and
- Publications from all sources on youth issues (including those not developed by FYSB).
- B. Statistical information -- information on numbers of sub-populations served through ACF programs supported wholly or in part by Federal dollars (e.g., characteristics and financial circumstances of families served by TANF; information on program recipients' participation in work activities; information on the child support caseload; number and characteristics of children who are victims of child abuse and neglect or who are adopted from public child welfare systems; number of children served in Head Start; percentage of Head Start teachers with a college degree; numbers and characteristics of children served by Runaway and Homeless Youth Programs; number of children in each State receiving a child care subsidy under the Child Care and Development Fund.). Each year, the Children's Bureau publishes a report called "Child Maltreatment," presenting the latest statistics and trends in child abuse and neglect. In addition, the Children's Bureau publishes an annual report on "Outcomes in Child Welfare" with information from each State.

- C. Research and evaluation reports focused on social science research and evaluation pertinent to ACF programs and policy. The web site of each program within ACF makes the most recent reports available to members of the research community and the general public. Examples of research and evaluation reports disseminated include the "1998 National Estimates of the Number of Boarder Babies, Abandoned Infants and Discarded Infants" and the final report of the "Third National Incidence Study on Child Abuse and Neglect."
- D. Reports to the Congress -- Several programs submit annual reports to Congress in compliance with legislative provisions authorizing their implementation. For example, the Children's Bureau's report, "Blending Perspectives and Building Common Ground: A Report to Congress on Substance Abuse and Child Protection" complies with such a legislative provision. In August 2000, TANF submitted the Third Annual Report to Congress to comply with section 411(b) of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996. The Family and Youth Services Bureau submits a biennial report to Congress that describes Runaway and Homeless Youth (RHY) operations and other activities. After release to Congress, this report is made available in the public domain. Annual RHY caseload data from the Runaway and Homeless Youth Management Information System (RHYMIS) are included in the Report to Congress and provided on request to grantees, researchers, advocacy organizations, and the general public.

## IV. Types of Dissemination Methods

Information is disseminated through printed, electronic, and presentation materials. Dissemination vehicles include brochures and targeted mailings to State officials, grantees, or others responsible for administering programs; posting information on the ACF web site; making information available through clearinghouses and resource centers; presenting and distributing information at appropriate conferences; and electronically collecting and distributing aggregated and disaggregated program-related data. Research funded by several agency programs is also disseminated through peer-reviewed journals.

Research and evaluation reports are disseminated in a number of ways. Reports with particular policy relevance and findings are distributed directly by mail to State program directors or other targeted audiences. Information on newly released reports is also shared with organizations that warehouse and broadcast information through their own networks (e.g., the Welfare Information Network and the Research Forum on Children, Families and the New Federalism). ACF's web site provides information on current research and evaluation projects, posts reports (or links to reports), and disseminates information through a listserv. In addition, ACF sponsors research conferences such as an annual Welfare Reform Research and Evaluation Conference that attracts State program staff, Federal regional staff researchers in the field and other organizations interested in ACF programs.

# V. Quality Assurance Policies, Standards and Processes for Ensuring the Quality of Information Disseminated to the Public

At ACF, the quality assurance process begins at the inception of the information development process. Further, ACF reviews the quality (including the objectivity, utility, and integrity) of information before it is disseminated and treats information quality as integral to every step of the development of information, including its creation, collection, maintenance and dissemination.

The review procedures may vary among programs depending upon the requirements of the program and the type of information to be disseminated:

1. Statistical Information: Statistical information pertaining to several programs disseminated by ACF is gathered from State agencies or local grantees. To assure the quality, integrity and consistency of this information, ACF staff review and analyze the data, subject the data to electronic validation procedures such as logic and edit checks, and contact the State or grantee to seek clarification in case discrepancies arise. States are provided opportunities to review and revise their information prior to publication in a federally published document or their placement on the web site. For example, TANF data collection is subject to edit and consistency checks and additional statistical analyses through a series of frequency distributions and cross tabulations to ensure the quality of data. The TANF program shares compiled information (e.g., work participation rates and High Performance Bonus data) with the States before publication to ensure accuracy.

- 2. Surveys: Surveys sponsored by ACF are conducted using methodologies that are consistent with generally accepted professional standards for all aspects of survey development, including sample frame development, statistical design of the survey sample, questionnaire design and testing, data collection, sampling and coverage errors, nonresponse analysis, imputation of missing data, weights and variance estimates. ACF surveys follow guidelines and policies set forth in the Paperwork Reduction Act (PRA) and other regulations related to the conduct of government surveys. ACF is committed to demonstrating in its PRA clearance packages that each draft information collection will result in information that will be collected, maintained, and used in a way that is consistent with OMB, HHS and ACF information quality guidelines. For example, ACF currently is funding a major multi-year longitudinal survey -- the National Survey of Child and Adolescent Well-Being (NSCAW) -- designed and implemented by a reputable national research organization. This project consults with a technical advisory group composed of state officials, members of the academic community, child welfare professionals and practitioners, and federal experts in the implementation of this study. Major research and evaluation studies sponsored by the agency usually rely upon technical advisory groups or federal experts or both for project guidance.
- 3. Analytic Reports and Policy Studies: Reports submitted by grantees and contractors for projects funded by ACF are subject to internal reviews by several agency officials for quality, objectivity, and accuracy. Federal experts from within and outside of the Department often monitor interim and final reports of projects with crosscutting implications.
  - Information contained in analytical reports and policy studies is based on estimates derived from reliable administrative data and external data sources. All data sources are identified. All analytic reports and policy studies are reviewed by technically qualified staff to ensure valid, complete, unbiased, objective and relevant analysis. Analytic reports and policy studies considered to be more technically complex are also reviewed by subject matter experts outside of the originating organizational component to provide additional perspective and expertise.
- 4. Policy documents are cleared through ACF and Departmental clearance procedures, including review by the Office of the General Counsel (to assure proper legal interpretation), as well as review by numerous other knowledgeable officials. In some cases, a technical advisory group convened for a specific project may review and comment on a report prior to its release. For example, the Office of Family Assistance (OFA) has developed intra-Departmental procedures for assuring the quality of disseminated information. The Office of the General Counsel, key OFA staff, and other offices review significant policy documents, where appropriate, and the documents are cleared by the Office Director before issuance. All ACF regulations and reports to Congress are subject to review and clearance under both ACF and Office of the Secretary's clearance processes in addition to other reviews.

#### **Policy for Correcting Errors:**

If an error is detected in the agency's reports and publications before mailing, it is corrected. If these materials have already been mailed, ACF issues a special notification to the recipients or includes an errata sheet with the subsequent publications. Errors in materials in the agency's web site are corrected online.

#### VI. Agency Administrative Complaint Procedures

ACF has developed administrative mechanisms to allow affected persons to seek and obtain correction of disseminated information that does not comply with OMB, HHS and ACF guidelines.

External complaints about information disseminated can be made electronically or in the form of written correspondence. James Eatmon, the Chief Information Officer (CIO), is the ACF official designated to receive and resolve complaints regarding information that does not comply with either the OMB guidelines or the agency's guidelines. The CIO's email address is: <a href="mailto:jeatmon@acf.dhhs.gov">jeatmon@acf.dhhs.gov</a>. His address is: James Eatmon, Director, Office of Information Services, Office of Administration, Administration for Children and Families, Aerospace Building, 7<sup>th</sup> Floor, 370 L'Enfant Promenade SW, Washington, D.C. 20447.

#### A. Responsibility of the Complainant

To seek a correction of information disseminated by the agency, individuals should follow the procedures

#### described below:

- A complaint or request for review and correction of information shall be in written hard copy or electronic form;
- 2. It shall be sent to the agency by mail or electronic-mail (e-mail);
- 3. It shall state that an information quality request for correction is being submitted.

#### The complaint shall contain

- 4. a detailed description of the specific material that needs to be corrected including where the material is located, i.e., the publication title, date, and publication number, if any, or the website and web page address (URL), or the speech title, presenter, date and place of delivery;
- 5. The specific reasons for believing the information does not comply with OMB, HHS or ACF guidelines and is in error and supporting documentation, if any;
- 6. The specific recommendations for correcting the information;
- 7. A description of how the person submitting the complaint is affected by the information error; and
- 8. The name, mailing address, telephone number, e-mail address, and organizational affiliation, if any, of the individual making the complaint.

Complainants should be aware that they bear the "burden of proof" with respect to the necessity for correction as well as with respect to the type of correction they seek.

#### B. Responsibility of the Agency

Based on a review of the information provided, the agency will determine whether a correction is warranted and, if so, what action to take. The agency will respond to the requestor by letter or e-mail. The agency's response will explain the findings of the review and the actions that the agency will take, if any. The response will consider the nature and timeliness of the information involved and such factors as the significance of the correction on the use of the information and the magnitude of the correction. The response will describe how the complainant may request reconsideration. The agency will respond to all requests for correction within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, the agency will inform the complainant that more time is required and indicate the reason why and an estimated decision date.

#### C. Appeals

If the individual submitting the complaint does not agree with the agency's decision (including the corrective action, if any), the complainant may send a written hard copy or electronic request for reconsideration within 30 days of receipt of the agency's decision. The appeal shall state the reasons why the agency response is insufficient or inadequate. Complainants shall attach a copy of their original request and the agency response to it, clearly mark the appeal with the words, "Information Quality Appeal," and send the appeal to the specific agency appeals address.

The agency official who resolved the original complaint will not have responsibility for the appeal. The agency will respond to all requests for appeals within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, the agency will inform the complainant that more time is required and indicate the reason why and an estimated decision date.

#### VII. Influential Scientific, Financial and Statistical Information

The Guidelines apply to certain statistical information disseminated by ACF in view of the potential substantial impact on important public policies. Since statistical information for major ACF programs such as foster care, child abuse and neglect, TANF, etc., are provided by States, ACF will work closely with the States to assure the completeness, reliability, and integrity of the data and the transparency of methodology and analytical techniques.

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