





Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Institute of Museum and Library Services

These Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Institute of Museum and Library Services are prepared under the Treasury and General Government Appropriations Act for Fiscal Year 2001, Section 515(b), and are designed to ensure and maximize the quality, objectivity, utility and integrity of information disseminated by IMLS.

- 1. IMLS has adopted a basic standard of quality (including objectivity, utility, and integrity) as a performance goal for all information that it disseminates. IMLS has taken appropriate steps to incorporate information quality criteria into IMLS information dissemination practices.
- 2. As a matter of good and effective agency information resources management, IMLS reviews the quality (including the objectivity, utility, and integrity) of information before it is disseminated. Information quality is integral to every step of IMLS' development of information, including creation, collection, maintenance, and dissemination. IMLS substantiates the quality of the information it has disseminated through documentation or other means appropriate to the information.
- 3. Generally, the office disseminating the information, such as the Office of Public and Legislative Affairs, the Office of Research and Technology, or the Offices of Museum and Library Services, will be responsible for reviewing the quality of information before dissemination, with appropriate oversight by IMLS' Director or the Director's designees. The originating offices will use internal peer reviews and other review mechanisms to ensure that disseminated information meets quality standards including objectivity, utility, and integrity in both presentation and substance. Each office is responsible for ensuring that the pre-dissemination review is performed and documented at a level appropriate for the type of information disseminated.
- 4. To facilitate citizen review, affected persons may seek and obtain, where appropriate, timely correction of information maintained and disseminated by IMLS that does not comply with OMB (67 Fed. Reg. 8451-8460, Feb. 22, 2002) or IMLS guidelines.
- a. Requests for correction should be sent in writing, by mail, fax, or email to:

Information Change Request

Office of General Counsel
Institute of Museum and Library Services
1100 Pennsylvania Avenue, NW
Washington, DC 20506
(202) 606-5414
(202) 606-1077 (fax)
nweiss@imls.gov

- b. The request should clearly identify the information asserted to be incorrect, including the name of the publication or other source of information, the date of issuance, and a detailed description of the information to be corrected. The request should state specifically why the information should be corrected for failure to comply with OMB or IMLS guidelines and should suggest specific changes.
- c. The request should include the requester's name, mailing address, fax number, email address, and telephone number. IMLS needs this information to respond to the request and to contact the requester as necessary.
- d. If a request does not reasonably describe the information asserted to be incorrect, IMLS may request additional information.
- 5. IMLS will investigate and respond to requests for correction in a flexible manner, taking into consideration the nature and extent of the complaint, the nature and timeliness of the information involved, the significance of the correction to the use of the information, and the magnitude of the correction needed. Should IMLS determine that a correction is necessary, appropriate responses might include personal contacts by letter or telephone, press releases, website postings, errata sheets in publications, or mass mailings to correct a widely disseminated error or address a frequently raised complaint.
- 6. IMLS will generally notify the requester in writing of the agency decision on whether and how any corrections will be made within 60 calendar days of receipt of the request. If the request requires more than 60 calendar days to resolve, IMLS will inform the requestor that more time is required, will specify the reasons for the delay, and will provide an estimated decision date. If the requester does not agree with the agency's decision regarding corrective action, the requester may file for reconsideration by the Director within 30 calendar days of IMLS' decision. Such reconsideration requests will generally be resolved within 60 calendar days.
- 7. IMLS' pre-dissemination review, under paragraph 2, applies to information that IMLS first disseminates on or after October 1, 2002. IMLS' administrative mechanisms, under paragraphs 4-6, apply to information that IMLS disseminates on or after October 1, 2002, regardless of when IMLS first disseminated the information.
- 8. The Chief Information Officer of the Institute of Museum and Library Services and the agency's Administrative Officer are responsible for IMLS compliance with pre-dissemination review under these guidelines. The General Counsel of the Institute of

Museum and Library Services is responsible for resolution of requests for correction.

- 9. On an annual fiscal-year basis, IMLS will submit a report to the Director of OMB providing information (both quantitative and qualitative, where appropriate) on the number and nature of complaints received by IMLS regarding agency compliance with these guidelines and how such complaints were resolved. IMLS will submit these reports no later than January 1 of each following year, with the first report due January 1, 2004.
- 10. Definitions. IMLS incorporates by reference the definitions set out in OMB's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, 67 Fed. Reg. 8451-8460 (Feb. 22, 2002).
- a. "Quality" is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these four statutory terms, collectively, as "quality."
- b. "Utility" refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that IMLS disseminates to the public, IMLS will consider the uses of the information, not only from the perspective of IMLS, but also from the perspective of the public. As a result, when reproducibility and transparency of information are relevant for assessing the information's usefulness from the public's perspective, IMLS will take care to ensure that reproducibility and transparency have been addressed in its review of the information.
- c. "Objectivity" involves two distinct elements, presentation and substance.
- (1) "Objectivity" includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within a proper context. Sometimes, in disseminating certain types of information to the public, other information must also be disseminated in order to ensure an accurate, clear, complete, and unbiased presentation. Also, IMLS will, where appropriate, identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a scientific or statistical context, the supporting data and models, so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Where appropriate, supporting data should have full, accurate, and transparent documentation, and error sources affecting data quality should be identified and disclosed to users.
- (2) In addition, "objectivity" involves a focus on ensuring accurate, reliable, and unbiased information.
- (a) In a scientific or statistical context, the original or supporting data shall be generated, and the analytical results shall be developed, using sound statistical and research methods.

- (b) If the results have been subject to formal, independent, external peer review, the information can generally be considered of acceptable objectivity.
- (c) In those situations involving influential scientific or statistical information, the results must be capable of being substantially reproduced, if the original or supporting data are independently analyzed using the same models. Reproducibility does not mean that the original or supporting data have to be capable of being replicated through new experiments, samples or tests.
- (d) Making the data and models publicly available will assist in determining whether analytical results are capable of being substantially reproduced.
- (3) These guidelines do not alter the otherwise applicable standards and procedures for determining when and how information is disclosed. Thus, the objectivity standard does not override other compelling interests, such as privacy, trade secret, and other confidentiality protections.
- d. "Integrity" refers to the security of information, or protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.
- e. "Information" means any communication or representation of knowledge, such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition includes information that IMLS disseminates from a web page, but does not include the provision of hyperlinks to information that others disseminate. This definition does not include opinions, where IMLS' presentation makes it clear that what is being offered is an individual's opinion rather than fact or IMLS' views.
- f. "Government information" means information created, collected, processed, disseminated, or disposed of by or for the Federal Government.
- g. "Information dissemination product" means any book, paper, map, machine-readable material, audiovisual production, or other documentary material, regardless of physical form or characteristic, that IMLS disseminates to the public. This definition includes any electronic document, CD-ROM, or web page.
- h. "Dissemination" means IMLS initiated or sponsored distribution of information to the public in all media and formats. Dissemination does not include:
- (1) distribution limited to government employees or IMLS contractors or grantees; intra- or inter-agency use or sharing of government information;
- (2) responses to requests for IMLS records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar law; or

- (3) distribution limited to correspondence with individuals or persons, press releases (unless they contain new substantive information not covered by a previous information dissemination subject to the guidelines), archival records, public filings, subpoenas or adjudicative processes.
- i. "Influential," when used in the phrase "influential statistical information," means IMLS expects that information in the form of analytical results will likely have an important effect on the development of domestic or international government or private sector policies or will likely have important consequences for specific technologies, substances, products, or firms.
- j. "Capable of being substantially reproduced" means that independent reanalysis of the original or supporting data using the same methods would generate similar analytical results, subject to an acceptable degree of imprecision.

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Questions, comments, or problems? Contact IMLS via email imlsinfo@imls.gov or by phone (202) 606-8536.