# **Information Quality Guidelines**



Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Overseas Private Investment Corporation

# **Background**

The Office of Management and Budget (OMB) issued government-wide guidelines (the OMB Guidelines) as required by Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; H.R. 5658) (Section 515) to ensure and maximize the quality of information disseminated by Federal agencies. The OMB Guidelines were published on September 28, 2001 (66 FR 49718) and on January 3, 2002 (67 FR 369) (and reprinted in their entirety on February 22, 2002, 67 FR 8452), "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies." Each Federal agency is required to issue its own guidelines to comply with the Section 515 requirements.

## Overview

The OPIC Guidelines are designed to maximize the quality, objectivity, utility, and integrity of the information disseminated by the Corporation. In developing its guidelines, OPIC has attempted to follow the OMB Guidelines.

OPIC has always attempted to achieve a high standard of quality in the information it disseminates. The Corporation makes every effort to ensure the quality, objectivity, utility, and integrity of information it disseminates.

The OPIC Guidelines include a mechanism for members of the public to seek and obtain appropriate correction of information covered by these Guidelines maintained and disseminated by OPIC after October 1, 2002 that does not comply with the OMB or OPIC guidelines. OPIC's pre-dissemination review under these Guidelines applies to information first disseminated by it on or after October 1, 2002.

As required by the OMB Guidelines, OPIC will report annually to the Director, OMB on the number and disposition of such requests received by the Corporation.

Nothing in these Guidelines is intended to confer any legal right on any individual.

## **Quality Standards**

The OPIC Guidelines outline quality standards appropriate for covered information disseminated by the Corporation and agency processes for reviewing quality before information is disseminated.

In general terms, the essential elements of quality are:

- utility, the information is useful to its users;
- **objectivity**, the information is presented in a clear, accurate, complete, unbiased manner and is accurate, reliable, and unbiased as to its substance;
- integrity, the information is protected from unauthorized access or revision; and
- transparency and reproducibility, the information is capable of being substantially reproduced.

**Utility** involves the usefulness of the information to its intended users. The Corporation attempts to achieve utility by keeping informed of information needs and developing new data and information products as appropriate. OPIC also attempts to assure utility in general by disseminating information:

- required by Congressional mandate or government-wide administrative requirements;
- regarding the work of OPIC Advisory Committees;
- designed to meet needs of consumers; and
- resulting from surveying information needs and developing new information products as appropriate.

Objectivity involves a focus on ensuring that information is accurate, reliable, and unbiased and that information

products are presented in an accurate, clear, complete, and unbiased manner. OPIC attempts to assure objectivity in general by disseminating information that is:

- · based on reliable data sources;
- based on sound analytical techniques;
- subject, where appropriate, to a multi-tiered review process; and

**Integrity** refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. OPIC is subject to statutory requirements for protecting information and, in general, attempts to assure the integrity of its information by compliance with those statutory requirements. These include:

- the Foreign Assistance Act of 1961, as amended;
- the Privacy Act of 1974;
- the Freedom of Information Act:
- the Computer Security Act of 1987;
- the Trade Secrets Act;
- OMB Circulars A-123, A-127, and A-130;
- the Government Information Security Reform Act; and
- the Federal Managers Financial Integrity Act of 1982.

Reproducibility refers to transparency in research design and methods and, where possible, the Corporation attempts to make clear its methods. In some cases, information disseminated by the Corporation is not collected by it but rather is compiled from a variety of sources that are constantly updated and, in many cases, contain confidential information. In such cases the Corporation discloses its methods and keeps users informed about corrections and revisions.

The Corporation also achieves transparency through wide dissemination of its information. Most information products are made available through the OPIC website and can be accessed and downloaded directly.

# **OPIC Commitment to Quality of Information**

The Corporation attempts to ensure that disseminated information covered by these guidelines meets the information quality criteria as defined in the OMB guidelines and in these guidelines. OPIC has always treated information quality as integral in its development of information, including its creation, collection, maintenance, and dissemination.

The Corporation is committed to disseminating information that meets its standards for objectivity, integrity, and utility. Before the Corporation disseminates any information to the public, all aspects are thoroughly reviewed by expert staff and appropriate levels of management. The Corporation's current internal review and approval policies and procedures ensure, to the best of the Corporation's ability, that the Corporation's disseminated information and data are accurate and timely, appropriate for external consumption, and useful to the public.

In many cases, the Corporation's process for reviewing information for its adherence to quality standards is inherent in and included in the Corporation's internal review process. This review process allows the Corporation to substantiate the quality of covered information disseminated. Disseminated material is reviewed by knowledgeable staff within the originating office and across divisions before final review by the Corporation.

All disseminated information covered by these Guidelines is reviewed for editorial consistency, clarity, and accuracy. The agency strives to ensure that such information is unbiased, objective and relevant, and accurate. All information covered by these Guidelines is edited and proofread before release to ensure clarity and coherence of the final product. Text is edited to ensure that the information is easy to read and grammatically correct, that thoughts and arguments flow logically, and information is worded clearly and concisely. Tables and charts are edited to ensure that they clearly and accurately illustrate and support points made in the text, and include concise but descriptive titles.

In submissions under the Paperwork Reduction Act of proposed collections of information, the Corporation will attempt to demonstrate that such collections will result in information collected, maintained, and used in a manner consistent with the OMB and OPIC Guidelines.

## Information not covered by the OMB or the OPIC Guidelines includes:

- distributions limited to Corporation employees or contractors, such as internal operating procedures, training manuals and requests for proposals;
- archival records;
- public filings or agency dissemination of public filings unless the agency adopts, endorses, or uses the information to formulate or support a regulation, guidance, or other agency decision or position;
- correspondence with individuals or persons;
- press releases, publications, or consumer information that announces, supports the announcement of, or gives public notice of information the Corporation has disseminated elsewhere;
- reports and other presentations containing a disclaimer that the opinions and information contained therein are those of the individual staff author and do not necessarily reflect the views of the Corporation;
- documents not disseminated to the public and intended only for inter-agency and intra-agency communications and information-sharing;
- disseminations intended to be limited to subpoenas and adjudicative processes, including Corporation
  orders, opinions, amicus, and other briefs. Adjudicative processes also include factual allegations by the
  staff during the investigative and litigation phases of cases brought by the Corporation's Division of
  Enforcement. Because there are well-established procedural safeguards and rights to address the quality
  of factual allegations and adjudicatory decisions, and to provide persons with an opportunity to contest
  decisions, these guidelines do not impose any additional requirements on the Corporation during
  adjudicative proceedings and do not provide parties to such adjudicative proceedings any additional rights
  of challenge or appeal; and
- responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar law.

#### **Request for Correction**

To request correction of information covered by these OPIC Guidelines that does not comply with the OMB or OPIC Guideline:

- 1. <u>Click here</u> to submit your request online, or
- 2. Email us at informationquality@OPIC.gov, or
- 3. Fax us at (202) 842-8413, or
- 4. Write to us at

OPIC Information Quality
Office of the CIO
Attn: Richard Westfield, Deputy CIO
1100 New York Ave, NW
Washington, DC 20527

All such requests for correction will be acknowledged within ten days of receipt and referred to appropriate staff for review.

After review, OPIC will determine whether a correction is warranted and, if so, what corrective action it will take. Any corrective action will be determined by the nature and timeliness of the information involved and such factors as the significance of the error on the use of the information, the magnitude of the error, and the cost of undertaking a correction. The Corporation is not required to change, or in any way alter, the content or status of information simply based on the receipt of a request for correction. The Corporation need not respond substantively to frivolous or repetitive requests for correction; nor need it respond substantively to requests that concern information not covered by the guidelines or from a person whom the information does not affect.

OPIC will make a decision on whether and how to correct the information within 60 days and the requestor will be notified of that decision by telephone, email, FAX, or in writing.

The requestor may request reconsideration of OPIC's decision within 60 days of the date of the OPIC decision. Such requests must be made <u>online</u>, by <u>email</u> or in writing (OPIC Information Quality, Office of the CFO, 1100 New York Ave, NW, Washington, DC 20527).

OPIC will reconsider its decision; a decision will be made by the Chief Information Officer or delegatee after consultation with the staff of the division or office that received the original request and with other officials, as

appropriate. The requestor will be notified of the decision by mail within six weeks.

## **Privacy Act Statement**

The Corporation is authorized to collect the information provided by the requestor under Section 515. The information is necessary to process the request and to allow the Corporation to respond. The requestor is not required to furnish the information but failure to do so may prevent the request from being processed. The principal use is to process and respond to the request.

For OPIC's website privacy policy, click here.

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