

August 13, 2001

TO Office of Information and Regulatory Affairs, Attn Brooks Dickson

FROM: Thomas N. Pyke, Jr.
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SUBJECT Comments to Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies

The National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to comment on the Office of Management and Budget's (OMB) "Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies," 66 F.R. 34489 (June 28, 2001). The proposed guidelines implement Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Pub. L. 106-554) ("Section 515").

NOAA is a scientific agency which collects and disseminates an enormous quantity of environmental data. This data includes many types of atmospheric and oceanographic data collected in many ways using a wide variety of instruments. NOAA is constantly striving to improve the quantity and quality of this data. NOAA also strives to disseminate this data as widely as possible so as to derive maximum value from it. NOAA has stringent quality control processes in place and responds to feedback from appropriate sources about data accuracy. These processes are based on scientific principles that ensure the integrity of NOAA's products

Although Section 515 appears to apply to scientific data including the environmental data that NOAA collects and distributes, there may be some unintended consequences. For example, when the National Weather Service (NWS), a NOAA Line Office, misses a forecast the NWS receives numerous inquiries, complaints, etc. The proposed guidelines can be construed to require the NWS to "allow affected persons to seek and obtain correction of information maintained [e.g an official forecast] and disseminated by the agency..." (Section III(3) of the proposed guidelines). Does this mean that the NWS could be requested to change a forecast after the fact? Or could someone with an economic interest challenge official observational data which could affect the value of an insurance payout? As drafted, this requirement of Section 515 could be applied to such situations and have negative and unintended results for the NWS. We recommend this area of Section 515 be reworded to, minimally, preclude these potentially unnecessary consequences. The easiest approach is to limit the scope of Section III(3) to information disseminated regarding a particular individual or entity. It could simply be amended to read as follows:

Section III 3. As a matter of citizen review, agencies should establish administrative

mechanisms to allow affected persons to seek and obtain correction of information about them maintained and disseminated by the agency that does not comply with these OMB guidelines...

Alternatively, as Circular A-130 also covers much of an agency's responsibilities for data quality, consideration should be given to limiting Section 515 to regulatory agencies only.

Comments on the following two questions were requested:

Federal agencies disseminate many types of information for many types of programs and functions. Should the OMB guidelines devote particular attention to specific types of information or information dissemination products?

As described above, care should be taken to ensure that the guidelines not have unintended consequences on the collection of scientific observations, measurements, and forecasts.

Should OMB develop specific guidelines to address information that Federal agencies disseminate from a web page? Is there any need to adapt these guidelines to the agency use of a web page?

While some guidelines such as those for privacy and accessibility are clearly of Government-wide impact, the variety of information disseminated from agency web pages requires careful development of guidance by the implementing organization and precludes complete Government-wide guidance.