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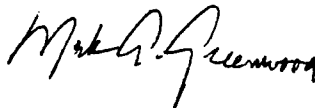
Brooke Dickson
Office of Information & Regulatory Affairs
U.S. Office of Management and Budget
Washington, DC 20503

Dear Ms. Dickson:

On behalf of the Coalition for Effective Environmental Information, I am submitting the attached comments on OMB's "Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies." These Guidelines were offered for public comment on June 28, 2001 (66 Fed. Reg. 34489). Along with the comments, we have also attached a document entitled "Environmental Information Management: Recommendations for the Bush Administration" (December, 2000), which we have incorporated by reference into our comments.

Thank you for the opportunity to provide comments on this important policy initiative.

Sincerely,



Mark A. Greenwood

**Proposed Guidelines for Ensuring and Maximizing the Quality,
Objectivity, Utility and Integrity of Information
Disseminated by Federal Agencies**

Comments of the Coalition for Effective Environmental Information

On June 28, 2001, the U.S. Office of Management and Budget (OMB) issued a Federal Register notice (66 Fed. Reg. 34489) requesting comment on proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies. These guidelines, which are intended to implement Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Pub. L. No. 106-554), will be incorporated into OMB's Circular A-130, "Management of Federal Information Resources". OMB intends that agencies will make appropriate changes to their regulations and policies to implement the provisions in these Guidelines.

The Coalition for Effective Environmental Information (CEEI) is a group of major companies and business organizations, representing a wide range of industrial sectors, that share a common interest in improving how the government collects, manages, uses and disseminates environmental information.¹ CEEI supports public policies that encourage data quality, governmental accountability, efficient data collection, alignment of data with strategic goals and consistent management of environmental information resources.

The proposed OMB Guidelines address one of CEEI's primary interests – improving the quality of information that the federal government offers to the public. We support efforts by OMB and individual agencies to address data quality issues in a systematic way. By way of background, we attach a document, submitted to the Bush Administration in December of 2000, that presents a series of recommendations for improving environmental information management. Many of these recommendations include good practices that have applicability beyond the environmental field.

The attached document gives special attention to the topic of data quality. In addition to providing specific recommendations for improving data quality, the document includes an appendix titled "The Data Quality Challenge" which provides our analysis of some root causes of disputes about data quality and a framework for how these challenges can be addressed by federal agencies. We believe that the perspectives reflected in our analysis have equal relevance to information policies in other federal agencies. We strongly urge OMB to consider this analysis as it proceeds with these Guidelines.

¹ CEEI includes representatives from the aerospace, chemical, energy, automobile, pharmaceutical, forest products, petroleum, electronics and consumer products industries.

Based on its experience with information policy in the environmental area, CEEI offers the following comments on the OMB Guidelines:

Data Quality is a Broad Concept

OMB should maintain a broad definition of data quality. Our experience has taught us that different stakeholder groups often have different perspectives on what are the most important dimensions of data quality. (See *The Data Quality Challenge* at 5-7.) Some groups focus on the pure accuracy or statistical rigor of data. Other groups emphasize the timeliness or completeness of data. Federal policies should be designed to foster all of these dimensions of data quality. No useful purpose is served by crafting a narrow definition of data quality. At the same time, if OMB decides to embrace explicitly a broader definition of data quality, terms like “completeness” and “timeliness” would need greater definition.

The Importance of Context

It is equally important for the Guidelines to emphasize that agencies should place publicly disseminated data in context with other relevant information. This principle is noted in paragraph V.1.B of the Guidelines. In the absence of contextual information, the public can often draw unwarranted conclusions.

As an example from the environmental field, distortions can occur when government agencies publish lists of chemicals that they intend to review. In some cases, parties reach conclusions about the chemicals before the review is complete. This has occurred with the federal efforts to assess chemicals, using validated tests, for potential endocrine disruption effects.² The U.S. Environmental Protection Agency (EPA) is still in the process of developing validated tests to identify such chemicals. Even though such tests have not yet been established, some organizations (e.g., Illinois EPA – but not U.S. EPA) have already published lists of chemicals that assertedly do, in fact, disrupt endocrine systems in the body. These lists do not make clear that it is not technically possible, at this stage, to identify endocrine-disrupting chemicals with any confidence.

This type of misunderstanding can be mitigated when agencies provide better contextual information. EPA has, for example, provided appropriate contextual information about a list of chemicals under review in the Federal Register notice for its Voluntary Children’s Chemical Evaluation Program (65 Fed. Reg. 81700, December 26, 2000). Another positive example is EPA’s Risk Screening Environmental Indicators (RSEI) model, which has a page on “strengths and limitations.” See http://www.epa.gov/oppt/env_ind/strength.htm.

Three Types of Information Activities and Corresponding Quality Obligations

In paragraph III.1 of the Guidelines, OMB states that “Quality is to be ensured and established at levels appropriate to the nature of the information to be disseminated.” This is an extremely important principle to establish, and OMB should consider amplifying the concept.

² This review was mandated under the Food Quality Protection Act of 1996.

As described in more detail in the attached document, CEEI has found it useful to distinguish three types of agency activities that carry differing levels of responsibility for data quality: (1) management of original documents; (2) compilation of data from other documentary materials; and (3) development of interpretive information products. See *The Data Quality Challenge* at 15-16.

When an agency is managing original documents submitted by outside parties or generated within the agency, data quality responsibilities are at a minimum. The documents speak for themselves. Agencies are generally responsible for managing those documents in accord with federal policies about security (e.g., Trade Secrets Act), public disclosure (e.g., Freedom of Information Act) and record retention.

Agencies also undertake efforts to consolidate data from separate documents into consolidated databases for use by government employees and, increasingly, by members of the public. Data quality responsibilities become more significant for such resources. The agency must assure that data is accurately transferred to the consolidated data base, that the limits of the original data collection activity are explained and that the appropriate uses of the data are understood.

Increasingly, agencies are also engaged in the development of more sophisticated information resources, often in the form of Web sites, that consolidate different types of information to convey a message or interpretation about a public concern. These “information products” can be quite influential in affecting private sector decisions about companies, facilities and products, particularly when they take the form of Web sites. (As OMB notes, the Internet “increases the potential harm that can result from dissemination of information that does not meet ... quality standards.” 66 Fed. Reg. 34490.) The potential influence of these information products in the global marketplace warrants a close look at data quality issues before the agency issues such a product. We believe that agencies developing or significantly modifying interpretive information products should apply “stewardship principles” that are described below.

Information Stewardship

In the Discussion section following paragraph III.2., OMB states that “Agencies may want to consider developing different processes to address different types of information.”³ CEEI agrees with this conclusion and suggests that it be amplified. When an agency is developing an interpretive information product, as outlined above, CEEI believes that “stewardship principles” should guide behavior.

The objective of these principles is to provide accurate information about an important question in a form that is understandable to the customer. The starting point for achieving this goal is to define the purpose and audience for the product. Based on that understanding, the

³ Similarly the existing Circular A-130 states that agencies “will [c]onsider the effect of their activities on members of the public and ensure consultation with the public as appropriate.” See §8.a.1.b.

agency can determine what is acceptable under the differing dimensions of data quality (i.e. accuracy, timeliness, precision, comparability, context, data requirements and process.)

In designing an information product, agencies can then define both the content of the information product as well as the “labeling” for the product, which articulates the product’s purpose, directions for its use and appropriate caveats. The agency should consider sharing the product with its intended audience and data source provider (i.e., “beta-testing”) to see whether the intended messages and applications are correctly interpreted and understood. Agencies should also provide for ongoing maintenance of an information product once it is issued, including such functions as error correction and technical assistance.

It should be noted that implementation of these principles does not necessarily require elaborate procedural steps. What is more important is that agencies go through the thought process required for good information stewardship, which can occur through a variety of mechanisms. A good example of how EPA has begun to institutionalize that thought process is the Agency’s “Lessons Learned about Designing, Developing and Disseminating Environmental Information Products” (November 17, 2000). See http://www.epa.gov/oeiinter/pdf/OIAA_Lessons-learned.pdf.

Finally, CEEI supports OMB’s conclusion that the quality of an information product should be reviewed and documented before the product is disseminated. (Paragraph III.2.) EPA’s Lessons Learned report reached a similar conclusion that data quality steps should begin at the inception of information product development. *Id.* at 9-15.

Agency Administrative Mechanisms Should Address Conformance with Agency Guidelines

In paragraph III.3. and Section IV. of the Guidelines, OMB proposes a series of procedural requirements for agencies to follow. These include mechanisms for citizens to seek correction of information and for agency reporting to OMB on the resolution of data quality complaints. Under the proposed Guideline language, these mechanisms and reports to OMB address complaints about whether the agencies have complied with the OMB Guidelines.

Yet we understand that, under Public Law No. 106-554 and Circular A-130, each agency would create its own data quality guidelines incorporating the OMB Guidelines. It would seem, then, that the touchstone for the agency correction mechanisms and reporting obligations would be the *agency policies and regulations* that are established to implement the general policies of the Guidelines. Accordingly, we suggest that any information correction mechanisms or reporting obligations be tied to the data quality standards in the agency policies and regulations, rather than the OMB Guidelines themselves, which are not intended to be self-implementing.

We also recommend that OMB define some reasonable time frame (e.g., 60 days) within which a correction request should be addressed.

Agencies Should Seek Public Comment on their Draft Guidelines

The Guidelines do not clarify whether agencies are required to seek public comment on the policies and regulations that they establish to implement these Guidelines. A wide range of stakeholders will very likely be interested in the data quality policies of individual agencies – potentially even more than they are in OMB’s guidelines. Accordingly, CEEI recommends that the OMB explicitly call for public comment on the regulations and policies that agencies create to implement the Guidelines.

At a broader level, OMB should be requiring greater transparency in all agency processes intended to implement these Guidelines. It is important for the public to know how they can participate in the development and implementation of data quality policies in the agencies. It is also important for OMB to make clear that agencies have a responsibility to respond to public inquiries and comments about these issues and to explain final decisions they make in response to correction requests.

Approach to Hyperlinks

The definition of “information” in the Guidelines excludes “hyperlinks to information others disseminate.” We have assumed that this language is intended to avoid a suggestion that federal agencies are required to conduct data quality reviews of all sites to which they might link their Websites. CEEI recognizes the legitimacy of that concern and does not favor policies that discourage linking public and private sector sites. Creation of information networks is a valuable aspect of the Web environment.

At the same, federal agencies can sometimes be faced with complex policy questions about whether they should link their Web sites to sites managed by other parties. Data quality could be one of many factors that they should consider in making those decisions. Federal agency policy on the appropriateness of hyperlinking to other Web material is not well-defined, and there has been little public discussion about what policies make sense. We cannot see that an agency decision about hyperlinking to another site would never be germane to the data quality policies of the federal government. Thus we would recommend deleting this exclusion for now, pending a maturation of federal policies in this area.

Breadth of the Data Quality Obligations

The OMB Guidelines are understandably focused on the quality of information that federal agencies intentionally develop and disseminate to the public. As noted in the definition of “dissemination” in Section V., the Guidelines are not applicable to “responses to requests for agency records under the Freedom of Information Act.” This limitation on the scope of the Guidelines is a reasonable one that CEEI does not challenge.

In looking at the longer term implementation of these Guidelines, however, the federal government should consider how data quality responsibilities will be aligned with the move toward Web postings of government information that results from the Electronic Freedom of Information Act (E-FOIA). Federal law now requires that government records that “have

become or are likely to become the subject of subsequent requests for substantially the same records” become “reading room records”, requiring agencies to make them available “by computer telecommunications or . . . other electronic means.”⁴ This mandate is pushing agencies toward Web posting of their internal documents and databases. As the federal government moves steadily forward toward an “e-government” mode of operation, the distinction between internal and public documents will continue to blur.

What are the implications of this phenomenon for improving the quality of information that the public receives from federal agencies? CEEI believes that one implication of this shift is that agencies should institutionalize stewardship principles wherever possible, leading to better quality information in all aspects of federal operations. Today’s internal database for a limited purpose may become tomorrow’s major public information resource.

At this time, however, CEEI does not recommend any explicit changes in the Guidelines to anticipate these changes. Instead, we urge OMB to monitor the implementation of E-FOIA, and the move toward “e-government” in general, to determine what types of information the agencies are moving to the Web and the respective quality of that information. Explicit policies to address these trends may make sense some time in the future.

Conclusion

CEEI appreciates this opportunity to comment on OMB’s Guidelines. We look forward to timely issuance of the Guidelines and full implementation of the Guidelines at federal agencies. We believe that a more systematic approach to data quality at federal agencies provides a valuable service to the public and enhances the credibility of public institutions.

Coalition for Effective Environmental Information
August 7, 2001

⁴ 5 U.S.C. §552(a)(2)(D).