



Department of Energy
Washington, DC 20585

AUG 10 2001

Ms. Brooke Dickson
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D.C. 20503

Dear Ms. Dickson,

The Energy Information Administration (EIA) of the Department of Energy (DOE) hereby submits the enclosed comments in response to the June 28, 2001, Office of Management and Budget (OMB) Federal Register notice "Proposed Guidelines for Ensuring the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" (66 FR 34489-34493). Please consider the comments as representing only EIA, not the entire DOE.

If you would like to discuss the comments, please contact Nancy Kirkendall, Acting Director of EIA's Statistics and Methods Group at 202-287-1706 or Nancy.Kirkendall@eia.doe.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mary J. Hutzler".

Mary J. Hutzler
Acting Administrator
Energy Information Administration

Enclosure

cc:
Howard Landon
DOE's Acting Chief Information Officer

Enclosure

Energy Information Administration (EIA) Comments on OMB's "Proposed Guidelines for Ensuring the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" (66 FR 34489-34493)

PROPOSED DEFINITION OF QUALITY

OMB's proposed definition of quality is understandable and appropriate for the guideline's coverage and the breadth of information disseminated by Federal agencies.

COVERAGE OF GUIDELINES

Given that the underlying law requires the guidelines to cover "information disseminated by Federal agencies," the guidelines are generic enough to cover the different types of information disseminated and the various media. OMB should not establish separate guidelines for information disseminated on the web. Individual agencies are better positioned to establish appropriate guidelines for their diverse information dissemination activities.

EIA's GUIDELINES FOR ENSURING QUALITY

EIA has in place an extensive program to ensure the quality, objectivity, utility, and integrity of information disseminated. This program includes: (1) statistical standards for the collection, processing, and dissemination of information; (2) a formal EIA-wide review program before the release of a new information product; (3) supplemental independent expert reviews by persons outside of EIA on selected technical information products; (4) performance measures as required by the Government Performance and Results Act; and (5) an Operations Security Program detailing the physical and cyber security policies for EIA's information. In addition to its quality assurance program, EIA periodically conducts customer surveys to assess customer opinions on quality, timeliness, accuracy, and other aspects of EIA's information products.

EIA foresees no problem in setting forth its information quality guidelines in a report that would be available on EIA's web site.

TRACKING AND REPORTING REQUESTS FOR CORRECTION OF DISSEMINATED INFORMATION THAT DOES NOT COMPLY WITH OMB'S GUIDELINES

OMB's proposed guidelines are unclear as to whether OMB wants agencies to track and annually report on: (1) complaints received regarding agency compliance with OMB's guidelines, or (2) complaints received regarding the quality (including the objectivity, utility, and integrity) of information disseminated. These are two very different concepts and the guidelines must be very clear on OMB's requirements.

Effectively tracking complaints on quality issues is very problematic. Users comment on EIA's information products using various methods (e.g., letters, telephone calls, e-mails, comment opportunities on our web site) and these comments may be directed to individual staff members, EIA's National Energy Information Center (NEIC), EIA's Webmaster, EIA's Administrator, or to organizational elements. Any attempt to track all possible avenues for comments and the resolution of comments would be extremely cumbersome and it is doubtful that the results would accurately measure the variable of interest. (For example, EIA/NEIC receives over 24,000 telephone calls and thousands of e-mails annually.)

With respect to the types of complaints that are classified as relevant to OMB's guidelines concerning quality, the final OMB guidelines need to be more specific on what constitutes a relevant complaint. For example, users of EIA information products may complain about the frequency of the information (e.g., annual data versus preferred monthly data, the level of detail (e.g., national versus preferred state-level data), and the ability to access respondent-level data (i.e., EIA withholds most individually-identifiable data from public release to protect the confidentiality of information reported in EIA's surveys). EIA does not consider these as "quality" complaints. OMB needs to more explicitly define what constitutes a complaint concerning the quality of information disseminated.