
INFORMATION QUALITY – IMPLICATIONS OF RECENT LEGISLATION

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The requirements in the USDA Information Quality Guidelines can be traced back to the Data Quality Act passed in 2001. These requirements include standards for quality, objectivity, utility, and integrity of the information disseminated to the public. The agencies are also charged to identify the sources of the information so that the public can assess whether the information is objective. The risk mapping assignment requires us to deal with large data sets, mathematical models, statistical analyses and mapping. This Data Quality Act makes the record keeping of all the processes in development of a risk-map a legal mandate.

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Information Quality

Implications of recent legislation



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Information Quality

Legislation and Federal Guidelines

- Data Quality Act
 - OMB DQA Guidelines
 - USDA DQA Guidelines
- OMB Information Quality Bulletin for Peer Review
 - USDA Peer Review Guidelines

Data Quality Act

Sect. 515 of Treasury and General Government Appropriations Act for Fiscal Year 2001 (PL 106-554)

- Instructed OMB to:
 - Issue guidelines for “ensuring and maximizing the **quality, objectivity, utility, and integrity** of information (including statistical information) disseminated by Federal agencies”.
 - “Establish administrative mechanisms allowing affected persons to seek and obtain **correction of information** maintained and disseminated by the agency that does not comply with the guidelines”
 - Report to OMB the “**number and nature of complaints** received by the agency regarding the accuracy of information disseminated by the agency” and “**how such complaints were handled** by the agency”

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Purposes of Data Quality Act

- Congress enacted the DQA primarily in response to **increased use of the internet**, which gives agencies the ability to communicate information easily and quickly to a large audience.
- Under the DQA, federal agencies must ensure that the information it disseminates meets certain quality standards.
- Congress' intent was to prevent the harm that can occur when **government websites, which are easily and often accessed by the public, disseminate inaccurate information.**



OPM Information Quality Guidelines

Published Sept. 28, 2001 and Finalized Feb. 22, 2002

Each Federal agency:

1. By October 1, 2002, **issue its own information quality guidelines** ensuring and maximizing the quality, objectivity, utility, and integrity of information that it disseminates;
2. Establish administrative mechanisms to **allow affected persons to seek and obtain correction of information** maintained or disseminated by the agency that does not comply with OMB or agency guidelines;
3. **Report periodically to OMB** the number and nature of complaints received by the agency regarding the accuracy of its information and how such complaints were resolved.

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OMB Definitions

- **Information** – “any communication or representation of facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative or audiovisual”
- **Influential scientific, financial or statistical information** – “information that OMB determines will have a clear and substantial impact on important public policies or important private sector decisions”

USDA Information Quality Guidelines

- **Ensure and maximize the quality, objectivity, utility, and integrity of the information disseminated to the public;**
- **Adopt a basic standard of quality of information;**
- **Review the quality of information;**
- **Treat information quality as integral to every step in their development of information;**
- **Agencies will demonstrate that information collection complies with OMB and USDA information quality guidelines.**

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Information Quality Terms

- **Objectivity** – Accurate, reliable, and unbiased information
- **Utility** – Assess the usefulness of the information to intended users
- **Integrity** – Information protected from corruption or falsification



USDA General Quality Standards

Objectivity

- USDA agencies and offices will strive to ensure that the information they disseminate is substantively **accurate, reliable, and unbiased**
- USDA agencies and offices will **identify the source of the information** so that the public can assess whether the information is objective.

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USDA General Quality Standards

Utility

- USDA agencies and offices will **assess the usefulness of the information** they disseminate to its intended users, including the public.
- USDA agencies and offices will **ensure that transparency is addressed** in their review of the information prior to its dissemination.
- USDA agencies and offices will ensure that disseminated information is **accessible to all persons**.

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USDA General Quality Standards

- **Protect information they maintain from unauthorized access or revision** to ensure it is not compromised through corruption or falsification.
- **Secure information resources** by implementing the programs and policies required by the Government Information Security Reform Act.
- **Maintain the integrity of confidential information** and protect the information it gathers and disseminates as applicable to the PRA and other requirements.

USDA Supplementary Guideline Categories (6)

- Influential Scientific Info
- Influential Statistical & Financial Info
- Regulatory Info (Rules/NEPA/NFMA)
- General Reference Info
- Info About Programs and Services
- Organizational & Administrative Info



Supplemental Guidelines for **Influential** Scientific and Statistical Info

- Disseminate with high degree of transparency – disclose specific data sources, quantitative methods, and assumptions used in analyses
- Ensure reproducibility of original and supporting data according to commonly accepted scientific standards
- Allow independent reanalyses by qualified third parties

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Steps In Seeking A Correction

- Consult with agency
- Submit request (can request during comment period or after)
- Agency responds (60 days)
- Request reconsideration (within 45 days)
- Reconsideration of influential scientific, financial, or regulatory information or issues of a controversial nature
- USDA designates a panel and responds within 60 days

Elements of a Request for Correction

- Statement citing USDA Guidelines
- Requester contact info. (name, telephone...)
- Description of information to correct
- Explanation of noncompliance with OMB and/or USDA Guidelines
- Explanation of the effect of the alleged error
- Recommendation & justification for how the information should be corrected

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DQA Requests for Correction Received by the Forest Service

Goshawk Petitions - W.K. Olsen and Associates, (17-January-2003)

1. Goshawk Management Guidelines RM GTR 217 1992 (RFC #3001)
2. Black Hills National Forest Phase I Goshawk Analysis (RFC #3002)
3. Expert Interview Summary for the Black Hills National Forest Plan Amendment (RFC #3003)
4. Record of Decision for Amendment of Forest Plans in AZ and NM (RFC #3004)
5. Conservation Assessment for the Northern Goshawk in Southeast Alaska (RFC #3005)

Proposed Categorical Exclusions for Small Timber Harvesting - John Muir, Project/Earth Island Institute (RFC #3006) 10-March-2003

Proposed Rule for National Forest System Land and Resource Planning
Sierra Club, (RFC #3007) 7-April-2003

Willow Fly Catcher Petition, Region 3 - Dennis Parker (RFC #3008) 21-March-2003

Final Environmental Impact Statements for Forest-wide Weed Control
Plans, The Alliance for the Wild Rockies (RFC #3009) 14-September-2004



OMB Bulletin for Peer Review

- Each agency shall conduct a peer review on all *influential* scientific information
- Selection of reviewers
 - Expertise and Balance
 - Conflicts
 - Independence
- Mechanism of Review
- Transparency

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Highly Influential Scientific Information

- Potential impact > \$500 million/yr.
- Novel, controversial, or precedent-setting
- Significant interagency interest

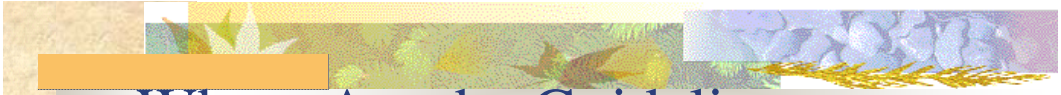
Additional Requirements

- Selection of Reviewers
 - Bar participation of scientists employed by the sponsoring agency
- Rotation
 - Avoid repeated use of same reviewer
- Opportunity for Public Participation
 - Make draft scientific assessment available for public comment during the peer review process
 - Sponsor a public meeting where oral presentations on scientific issues can be made to the peer reviewers
- Transparency
 - Agency shall prepare written response to peer review report

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Peer Review Planning

- Post agenda of peer review plans on website (w/ 6mo. Updates)
- Peer review plans
 - Describe process
- Establish mechanism for public comment on peer review plans
- Annual reports to OMB



Where Are the Guidelines Posted?

- Guidelines for all Federal Agencies

http://www.whitehouse.gov/omb/inforeg/agency_info_quality_links.html

- USDA Guidelines

http://www.ocio.usda.gov/irm/qi_guide/index.html

- Forest Service

<http://www.fs.fed.us/qoi>