

ENSURING QUALITY OF INFORMATION DISSEMINATED BY VA

1. REASON FOR ISSUE: To establish Department of Veterans Affairs (VA) policy for ensuring that information VA disseminates to the public meets quality standards defined in the Office of Management and Budget (OMB) and VA guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated to the public. It also provides policy for the administrative correction and appeal mechanisms VA has established to allow affected persons to seek and obtain correction of disseminated information that does not comply with established standards. This directive implements requirements of Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554), which required OMB to issue government-wide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information they disseminate, and further required each Federal agency to issue its own implementing guidelines subject to approval of OMB.

2. SUMMARY OF CONTENTS/MAJOR CHANGES: This directive sets forth policies and responsibilities for reviewing and substantiating information before it is disseminated by VA, and for processing valid requests for correction of disseminated information that does not meet established standards. It also establishes mandatory compliance with VA Handbook 6361, Ensuring Quality of Information Disseminated by VA and VA Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by VA. The directive contains:

- a. Responsibilities for implementing and managing programs to ensure that information disseminated by VA is accurate, clear, complete, unbiased, and protected from unauthorized access or revision;
- b. Requirements for higher quality standards for "influential" financial, statistical, and scientific information;
- c. The types of media and information products applicable to and exempt from these policies; and
- d. Requirements for administrative correction and appeal processes.

NOTE: *Paragraph 5 of this directive contains definitions that are important for understanding the terminology and application mandated by OMB.*

3. RESPONSIBLE OFFICE: Records Management Service (005E3), Office of the Assistant Secretary for Information and Technology.

4. RELATED HANDBOOK: VA Handbook 6361, Ensuring Quality of Information Disseminated by VA.

5. RESCISSION: None

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

/s/
Robert N. McFarland
Assistant Secretary
for Information and Technology

/s/
Robert N. McFarland
Assistant Secretary
for Information and Technology

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ENSURING QUALITY OF INFORMATION DISSEMINATED BY VA

1. PURPOSE. This directive provides Department-wide policy for ensuring the quality of information VA disseminates to the public. It implements provisions of Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554). Section 515(a) directed OMB to issue Government-wide policy and procedural guidance to Federal agencies relative to information they disseminate to the public. Section 515(b) required Federal agencies to issue their own implementing guidelines, including an administrative procedure to allow affected persons to seek and obtain correction of information that does not comply with the guidelines. Procedures for implementing policies in this directive are contained in VA Handbook 6361, Ensuring Quality of Information Disseminated by VA. The policies are also subject to all provisions of the Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35); OMB Circular A-130; Freedom of Information Act (5 U.S.C. 552); the Computer Security Act of 1987; and VA Directive 6102, Internet/Intranet Services.

2. POLICY. VA will ensure and maximize the quality, objectivity, utility, and integrity of information disseminated to the public. Additional levels of quality standards will be adopted for specific categories of information. VA will provide an administrative procedure to allow affected persons to seek and obtain, where appropriate, corrected information and to appeal contested decisions.

a. All information (except as noted in paragraph f) that VA disseminates on or after October 1, 2002, will be reviewed and substantiated to ensure compliance with policies contained herein. Requests to correct information disseminated prior to October 1, 2002, will be acceptable regardless of when VA first disseminated the information, if the disseminated information is not obsolete. Information dissemination products in all forms of media, e.g., printed and electronic (the Internet and other technologies) will be reviewed and substantiated. Information dissemination products include books, papers, CD-ROMs, electronic documents, and other documentary materials. Information disseminated by VA from a web page is included; however, requests for correction of typographical errors, web page malfunctions, and non-VA hyperlinks from a VA Website are not included.

b. Higher quality standards will be applied to "influential" information that has a capacity to cause an adverse or financial impact on public policy or legislative matters relative to services provided to veterans. The more important the information -- the higher the quality standard that is applied. For example, those situations involving influential scientific, financial or statistical information may need to meet higher or more specific quality standards than those that would apply to other types of information.

c. Flexible, appropriate, and timely quality standards will be applied to the review and substantiation of information before it is disseminated. These quality standards will be incorporated into existing VA information resources management and administrative practices.

d. Policies contained herein will be applied in a common sense and workable manner so as not to impose unnecessary administrative burdens that prohibit organizations from taking full advantage of the Internet and other technologies when disseminating information to the public.

e. When VA-disseminated information is collected from a variety of sources that are regularly updated, revised, and may be confidential in nature, VA will ensure quality by providing documentation, reviewing the methods used in developing the data, consulting with experts and users, and keeping users informed about corrections and revisions.

f. The following are excluded from the definition of disseminated information:

(1) Information limited to Government employees or Department contractors or grantees, intra- or inter-Departmental use or sharing of Government information;

(2) Correspondence with individuals;

(3) Press releases (unless they contain new substantive information not covered by a previous information dissemination subject to the guidelines), archival records, library holdings and distribution limited to public filings, subpoenas, or adjudicative processes;

(4) Responses to requests for Department records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar laws;

(5) Requests from individuals for correction of personal information or information related to death and disability payments, education, home loans, disability, medical care, insurance, burial and survivor benefits, or related information pertaining to specific VA claims, benefits records, or services delivered;

(6) Third party dissemination of information (the exception being where the Department adopts the information as its own);

(7) Opinions, if it is clear that what is being offered is someone's opinion rather than fact or the Department's views. However, any underlying information published by the Department upon which the opinion is based may be subject to these guidelines.

(8) Some scientific research. Scientific research conducted by Federally employed scientist or Federal grantees who publish and communicate their research findings in the same manner as their academic colleagues is not covered by these guidelines unless the agency represents the information as, or uses the information in support of, an official position of the agency.

3. RESPONSIBILITIES

a. **Secretary of Veterans Affairs.** The Secretary has designated the Department's Assistant Secretary for Information and Technology (Chief Information Officer), as the senior Department official responsible for the Department's information and technology programs.

b. **Chief Information Officer (CIO).** The CIO, through the Associate Deputy Assistant Secretary for Enterprise Architecture Management, will:

(1) Ensure compliance with requirements of Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554).

(2) Designate the Director, Records Management Service, to:

(a) Establish Department-wide policies and procedures to ensure the quality of information disseminated by VA;

(b) Issue changes to the policies and procedures as necessary to implement and manage the information quality program;

(c) Serve as the Department's Information Quality Officer (IQO);

(d) Request designation of a primary and alternate IQO from each administration and staff office;

(e) Advise and assist administrations and staff offices in the tracking and processing of requests for correction of disseminated information;

(f) Establish and maintain an administrative mechanism for tracking and responding to information corrections and appeals;

(g) Serve as VA's liaison officer with OMB and other Federal agencies regarding management and operation of the information quality program; and

(h) Establish procedures and reporting requirements for monitoring information quality complaints and preparing recurring and ad hoc reports.

c. **Under Secretaries, Assistant Secretaries, and Other Key Officials.** Under Secretaries, Assistant Secretaries, and Other Key Officials will:

(1) Establish an information quality program in their organizations for reviewing and substantiating the quality of information before it is disseminated;

(2) Ensure that their information quality program adheres to the policies and procedures outlined in the guidelines, this directive and the associated handbook;

(3) Establish information correction and appeal procedures;

(4) Designate a primary and an alternate IQO to coordinate internal information quality activities in accordance with provisions of this directive and its associated handbook; and

(5) Maintain and provide annual fiscal year data to the Department IQO on the number, nature, and resolutions of complaints received by the organization.

4. REFERENCES

- a. Computer Security Act of 1987.
- b. Freedom of Information Act (5 U.S.C. 552).
- c. OMB Circular A-130.
- d. Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35).
- e. VA Directive 6102, Internet/Intranet Services.

5. DEFINITIONS

a. **Affected persons.** Those individuals or entities that may use, benefit, or be harmed directly by the disseminated information at issue.

b. **Dissemination of information.** VA-initiated or sponsored distribution of information to the public.

c. **Influential information.** Disseminated Information that VA can reasonably discern will, or does have, a clear and substantial impact on important public policies or important private sector decisions. This type of information must have a significant impact on VA's public policy or legislative matters relative to delivery of veterans' benefits or health care services. VA's influential information includes the following categories:

(1) Statistical information obtained from original data collections; administrative records; compilations of data from primary sources such as forecasts and estimates derived from statistical models, expert analyses, data collection, and analysis and interpretations of statistical information.

(2) Financial information referring to Government revenues and expenditures.

(3) Scientific information designating the method of research in which a hypothesis, formulated after systematic, objective collection of data is tested empirically (relying on experiment and observation rather than theory).

d. **Information.** Any communication or representation of knowledge such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms.

e. **Quality.** The all-encompassing term that includes “utility,” “objectivity,” and “integrity” of VA information.

(1) **Integrity.** The protection of VA information from unauthorized, unanticipated, or unintentional access or revision to ensure that the information remains authentic and is not compromised.

(2) **Objectivity.** Ensuring that disseminated information is presented in an accurate, clear, complete, and unbiased manner, and as a matter of substance, is accurate, reliable, and unbiased.

(3) **Utility.** The usefulness of the information to the intended users.

f. **Reproducibility.** Disseminated information that can be substantially reproduced with essentially the same results, subject to an acceptable degree of imprecision or margin.

g. **Transparency.** The clear, obvious, and precise nature of the information.