

ENSURING QUALITY OF INFORMATION DISSEMINATED BY VA

1. REASON FOR ISSUE: This handbook establishes new Department of Veterans Affairs (VA) procedures for ensuring the quality of information before it is disseminated to the public, and implements policies contained in VA Directive 6361, Ensuring Quality of Information Disseminated by VA and in VA and Office of Management and Budget (OMB) guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated to the public.

2. SUMMARY OF CONTENTS/MAJOR CHANGES

a. This handbook introduces procedures for reviewing and substantiating publicly-disseminated information to ensure that it meets basic quality standards established by OMB and VA, and for tracking and processing complaints from affected persons seeking to obtain, where appropriate, corrections to information that does not meet the established quality standards. It also establishes the necessity for compliance with the following two authorities documents: (1) VA Directive 6361, Ensuring Quality of Information Disseminated by VA; and (2) Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by VA.

b. It identifies responsibilities for the Department's Information Quality Officer (IQO), as well as responsibilities for IQOs in the administrations and staff offices.

c. It contains quality standards designed to be flexible enough to fit all disseminated information in printed, electronic, or other forms of media.

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

4. RELATED DIRECTIVE: VA Directive 6361, Ensuring Quality of Information Disseminated by VA.

5. RESCISSION: None.

CERTIFIED BY:

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ENSURING QUALITY OF INFORMATION DISSEMINATED BY VA

1. PURPOSE

a. This handbook contains mandatory Department of Veterans Affairs (VA) procedures and responsibilities for:

(1) Reviewing, substantiating, and managing information created, collected, and disseminated to the public;

(2) Processing requests for correction of disseminated information that does not meet the established VA standards; and

(3) Complying with the Office of Management and Budget (OMB) reporting requirements.

b. The handbook supplements policies and responsibilities prescribed in VA Directive 6361, Ensuring Quality of Information Disseminated by VA and requirements outlined in VA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by VA. VA guidelines are modeled on guidance contained in the OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies. Collectively, the handbook, directive, and guidelines outline the tools necessary for ensuring that information the Department disseminates is objective, unbiased, and accurate in both presentation and substance.

c. Since administrations and staff offices disseminate a wide variety of data and information that can range in importance and scope, standards contained herein cannot be implemented in the same manner by every organization. The standards are designed to be generic enough to fit all disseminated information in printed, electronic, or other forms of media. Through this flexibility, each organization will have the opportunity to adapt the standards to their existing information resource management and administrative practices. While organizations' implementation of the standards may differ, the essence of the standards will still apply.

2. RESPONSIBILITIES OF THE DEPARTMENT INFORMATION QUALITY OFFICER (IQO). The VA Records Officer, located in the office of the Assistant Secretary for Information & Technology, will serve as the Department's IQO. The Department IQO will:

a. Establishing Department-wide policies and procedures to ensure the quality of information disseminated by VA;

b. Issuing changes to policies and procedures as necessary to implement and manage the information quality program.

c. Providing advice and assistance, and recommend to the Assistant Secretary for Information and Technology, policies, procedures, and other requirements governing the information quality program and its operation;

d. Serving as the Department's liaison officer with OMB and other Federal departments and agencies concerning activities related to management and operation of the information quality program;

e. Developing and maintain a mechanism to receive, process, and track requests for correction of disseminated information and responses;

f. Providing an annual fiscal year report to OMB (beginning January 1, 2004) containing quantitative and qualitative information, where appropriate, on the number, nature, and resolution of complaints received by the Department.

3. RESPONSIBILITIES OF UNDER SECRETARIES, ASSISTANT SECRETARIES, DEPUTY ASSISTANT SECRETARIES AND OTHER KEY OFFICIALS

a. Ensure that VA Directive 6361, Ensuring Quality of Information Disseminated by VA, this handbook, and Guidelines for Ensuring the Quality, Objectivity, Utility, and Integrity of Information Disseminated by VA are distributed within the administrations and staff offices;

b. Designate a primary and an alternate IQO in their areas of responsibility to assist in managing the program. IQO's will:

(1) Represent administration and staff office heads on matters relating to the program to ensure information quality;

(2) Coordinate and track requests for corrections and appeals within their respective areas of responsibility; and

(3) Provide annual fiscal year data to the Department IQO regarding the number, nature, and resolution of complaints received regarding perceived or confirmed failure to comply with VA standards.

c. Ensure that disseminated information is objective, unbiased, and accurate in both presentation and substance by establishing (or incorporating into existing information resource management) processes for reviewing and substantiating the quality of information in accordance with the following:

(1) Measure the quality of information by its objectivity. Objectivity focuses on whether the disseminated information is being presented in an accurate, clear, complete and unbiased manner. This includes presenting the information in the proper context, and disseminating other information, as necessary, to ensure an accurate, clear, complete, and unbiased presentation. Also, VA elements should, to the extent possible, and consistent with security, privacy, intellectual property, trade secrets, and

confidentiality protections, identify the sources of disseminated information. In a scientific, financial, or statistical context, provide supporting data and models so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Where possible, data should have full, accurate, transparent documentation, and possible sources of error affecting data quality should be identified and disclosed to users.

(2) Measure the quality of information by its utility. Utility refers to the usefulness of the data to intended users. In assessing the usefulness of information, VA organizations should consider the uses of the information they plan to disseminate, not only from their perspective, but also from the perspective of the public. As a result, when transparency of information is relevant for assessing the information's usefulness from the public's perspective, VA organizations should take care to ensure that transparency has been addressed in its review of the information.

(3) Measure the quality of data by its integrity. Integrity refers to security, which is the protection of information from unauthorized access or revision. VA organizations should ensure that information is not compromised through corruption or falsification.

(4) Establish peer review standards.

(a) VA will use many types of peer reviews. Transparency is important for peer review, and minimum standards are set for the transparency of VA-sponsored peer review. If data and analytical results have been subjected to formal independent, external peer review, the information may generally be presumed to be of acceptable objectivity. The intensity of peer reviews will be commensurate with the significance of the risk or its management. Peer reviewers selected by VA must be selected primarily on the basis of technical expertise, be expected to disclose to VA prior technical/policy positions they may have taken on the issues at hand, be expected to disclose to VA their sources of personal and institutional funding (private or public sector), and conduct their reviews in an open and rigorous manner.

(b) Peer review standards will be interpreted in a manner appropriate to assure timely flow of vital information from VA to medical providers, patients, health agencies and the public. VA may temporarily waive information quality standards in urgent situations (e.g., imminent threats to public health or homeland security).

(c) When analyses of risks to human health, safety, and the environment are disseminated, if at all, the quality principles applied by Congress to risk information used and disseminated pursuant to the Safe Drinking Water Act Amendments of 1996 (42 U.S.C. 300g-1(b)(3)(A) & (B)) will be applied to the extent feasible.

(5) Establish reproducibility standards.

(a) Reproducibility standards will be applied to original and supporting data. When original and supporting data must be generated and analytical results developed, a consistent reproducibility standard to transparency for how analytical results are

generated, will be applied. For example, specific data used, various assumptions employed, specific analytical methods used, and statistical procedures employed, will be documented. These methods will allow any qualified person to conduct an independent re-analysis, if necessary, which should produce substantially the same results as the original research. Organizations will be flexible in determining what constitutes original and supporting data.

(b) In cases where reproducibility may not occur due to other compelling interests (i.e., ethical, feasibility, or confidentiality constraints), organizations will: (1) perform robustness checks appropriate to the importance of the information involved (e.g., determining whether a specific statistic is sensitive to the choice of analytical method and the accompanying information disseminated); and (2) address the degree that reproducibility will be limited by the confidentiality of underlying data. Organizations will address ethical, feasibility, and confidentiality issues with care. Reproducibility of data is limited by the requirement that VA comply with federal confidentiality statutes, such as the Privacy Act, 5 U. S. C. 552a, and 38 U. S. C. 5701, 5705, and 7332.

(6) Establish Third Party Dissemination Standards.

(a) If VA disseminates information prepared by an outside party in a manner that reasonably suggests that VA agrees with the information, the appearance of having the information represent VA's views makes the information subject to the information quality standards. By contrast, VA does not "initiate" the dissemination of information when Federally-employed scientists, Federal grantees, or contractors publish and communicate their research findings in the same manner as their academic colleagues. This applies even though VA has funded the research and may retain ownership or other intellectual property rights.

(b) If VA, through a procurement contract or a grant, provides for a person to conduct research, and VA directs the person to disseminate the results (or VA reviews and approves the results before dissemination), then VA has "sponsored" the dissemination of this information, and the information is subject to the quality standards. By contrast, if VA provides funding to support research, and if the researcher (not VA) decides to disseminate the results and determines the content and presentation of the dissemination, then VA has not "sponsored" the dissemination. The information is not subject to these guidelines even though VA has funded the research and may retain ownership or other intellectual property rights.

(c) To avoid confusion regarding whether the Department is sponsoring the dissemination, the researcher should include an appropriate disclaimer in the publication or speech to the effect that the "views are mine, and do not necessarily reflect the views of VA." On the other hand, subsequent VA dissemination of such information requires that the information adhere to VA's information quality standards.

(7) Develop influential scientific, financial and statistical information standards. Influential information is determined when it can be reasonably discerned that dissemination of information 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:

(a) 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;

(b) Financial information referring to Government revenues and expenditures; and

(c) 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).

(8) Develop a correction and appeal process within their organization per requirements in Section 4, Administrative Correction/Appeal Procedures, herein and in the Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by VA.

4. ADMINISTRATIVE CORRECTION/APEAL PROCEDURES

a. An administrative process is available to allow affected persons to seek and obtain, where appropriate, timely correction of information that does not meet the established standards. The correction and appeal process is available for genuine and valid requests for correction of information, and the person filing the request has the burden of proof with respect to the necessity for correction as well as the type of correction requested.

(1) Information Correction Process

(a) If an affected person believes that disseminated information is not accurate, clear, complete, or unbiased, he or she can submit a request for correction via the "Contact the VA" link that appears at the bottom of VA's homepage. Requests for correction of information can also be submitted via written correspondence to the Department's Information Quality Officer in the Office of the Assistant Secretary for Information and Technology, Records Management Service (005E3), Department of Veterans Affairs, 810 Vermont Avenue, NW, Washington, DC 20420.

(b) Requests for correction of information will be routed to the appropriate VA administration or staff office for review. VA will respond to all requests for corrections within 60 calendar days of receipt. If the VA office receiving the request determines that it does not adequately and reasonably describe the disseminated information source, the correspondent will be advised that additional information is needed. If the correspondent does not respond within 60 calendar days, the complaint will be dismissed (See Appendix A for other reasons for dismissing a complaint). If the

challenged information is determined to be correct or valid, the correspondent will be provided with a statement as to why the request for correction is not acted upon and how to file an appeal.

(2) Information Appeal Process

(a) If affected persons who request corrections of information do not agree with VA's decision (including the corrective action, if any), they may file an appeal in writing within 60 calendar days to the office indicated in the denial correspondence. The envelope and reconsideration request both should be clearly marked "Information Correction Reconsideration Request." It is important that correspondents state why they disagree and what corrective action they seek. The appropriate VA organization will review the appeal and act upon the request for reconsideration. The correspondent will be notified whether the request was granted or denied and what corrective action, if any, VA will take on the appeal.

(b) To ensure objectivity, the VA organization that originally disseminated the information will not have responsibility for both the initial response and any subsequent appeal.

(c) If VA believes other agencies may have an interest in the appeal, those agencies will be consulted regarding their possible interest.

(3) Corrective actions will vary. Possibilities include correction or replacement of information on the Department of Veterans Affairs Website, revision of subsequent issues of recurring products, and issuance of errata for printed reports and other data products.

**REASONS FOR DISMISSING A REQUEST
FOR CORRECTION OF DISSEMINATED INFORMATION**

1. Complainant is not affected person.
2. Information at issue was not publicly disseminated by VA.
3. Information at issue was disseminated by VA, but was not authored by VA and not adopted as representing VA's views.
4. Information at issue is not covered by the information quality standards.
5. Complaint is identical to earlier complaint by same complainant.
6. Complaint is moot because requested correction has been made.
7. Complaint is frivolous (made in bad faith, without justification, inconsequential, and for which a response would be duplicative of existing processes, unnecessary, or unduly burdensome on VA).
8. Information at issue is obsolete.