

## OMB Watch Comparison Chart for Drafts of Data Quality Guidelines

Agency or Department	Council on Environmental Quality	Department of Agriculture	Department of Commerce	Department of Defense
<b>Comments Due</b>	1-Jul-02	1-Jul-02	3-Jun-02	30-May-02
<b>Contact</b>	Dinah Bear, General Counsel of the Council on Environmental Quality, 722 Jackson Place, NW., Washington, DC 20503. Comments can be emailed to informationquality@ceq.eop.gov.	Fax comments to Rich Allen, Associate Administrator, at (202) 720-9013 E-mail comments to rallen@nass.usda.gov Mail comments to: Rich Allen Associate Administrator USDA NASS Room 4117 South Building 1400 Independence Avenue, S.W. Washington, D.C. 20250-2001	Comments should be sent to Thomas N. Pyke, Jr., Chief Information Officer, Department of Commerce, 14th St. and Constitution Ave. NW, Room 5029B, Washington, DC 20230. Send email to informationquality@doc.gov.	Submit comments to Ellen Law, OADS(C3I), Office of the Assistant Secretary of Defense for Command, Control, Communications and Intelligence/Chief Information Officer, 6000 Defense Pentagon, Washington, DC 20301-6000. FOR FURTHER INFORMATION CONTACT: Ms. Ellen Law, OADS(C3I), 703-602-0980 Ext. 121, Ellen.law@osd.mil.
<b>Information Statement</b>	None	None	Commitment to Information Quality	None
<b>Not Legally Binding</b>	Not mentioned	Yes	Not mentioned	Not mentioned
<b>Dissemination Not Covered</b>	Shortened standard list in appendix		Standard - only mentioned in restrictions to requests	Standard mostly -- a little detail and expansion
<b>Influential Information Definition</b>	Standard	None	Standard - noted that all definitions are the OMB standard unless detailed otherwise.	Standard
<b>SDWA</b>	Adapt - but no detail	No Mention	No Mention	No Mention
<b>Request Requirements</b>	1) Indicate this is a request for correction 2) specify the information being contested including what aspect needs to be corrected 3) explain how they are affected by information 4) how information does not comply with guidelines 5) identify what corrective action is sought 6) all supporting evidence	1) Indicate this is a request for correction 2) Contact and identification information 3)Specify the information being contested 4) Why the information should be corrected (how information does not comply with guidelines) and recommend how it should be corrected	1) Contact and identification information 2) specify the information being contested 3) explanation of how requester is an affected person 4) explain how information fails to meet applicable quality standards 5) why information is incorrect	1) identify disseminating organization 2) location of information 3) description of information to be corrected 4) reason for the change 5) documented evidence
<b>Timeliness requirement</b>	Yes for initial request 90 days from information dissemination; and for appeal 60 days from receipt of initial response	No	No for initial request 30 days for appeal	No for initial request 30 days for appeal
<b>Affected Person Requirement</b>	Yes	No	Yes	No
<b>Affected Persons Definition</b>	Standard	None	Narrower- must meet each of three criteria 1)the person must have suffered an injury -- harm to an identifiable legal-protected interest 2) there must be a causal connection between the injury and the disseminated information -- the injury has to be fairly traceable to the disseminated information or decisions based on such information and not the result of independent or unrelated action 3) it must be likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.	Standard -- Persons who may benefit or be harmed by the disseminated information. This includes persons who are seeking to address information about themselves as well as persons who use information.
<b>Requests</b>	Unclear	Unclear	Decentralized	Centralized - sort of
<b>Request Decisionmaker</b>	Requests sent to Deputy General Counsel but not clear who decides	Standards Officer is the receiver of requests but procedures for decisions is unclear	Vague - each operating unit will establish procedures, decisions made by appropriate official	Public Affairs Activity in each component with consult to CIO
<b>Appeals</b>	Centralized	Unclear	Decentralized	Centralized
<b>Appeal Decisionmaker</b>	CEQ General Counsel	Only statement is that you will be informed of you appeal rights and the appeal process if your request is rejected	Head of the operating unit	Component Chief Information Officer
<b>Request Response Time</b>	60 Days	10 working days	60 Days	30 days
<b>Appeal Response Time</b>	60 Days	No	60 days	30 days

## OMB Watch Comparison Chart for Drafts of Data Quality Guidelines

Agency or Department	Department of Health and Human Services	Department of Labor	Department of Transportation	Environmental Protection Agency
<b>Comments Due</b>	31-May-02	31-May-02	31-May-02	31-May-02
<b>Contact</b>	Please submit written comments to Director, Division of Data Policy, Office of the Assistant Secretary for Planning and Evaluation, Attn: Information Quality Comments, U.S. Department of Health and Human Services, Room 440D, Hubert H. Humphrey Building, 200 Independence Avenue SW., Washington, DC 20201. Comments also may be e-mailed to Info.comments@hhs.gov.	Theresa M. O'Malley, Executive Office, Information Technology Center, Department of Labor, Room N-1301, 2000 Constitution Avenue, NW., Washington, DC 20210; fax number (202) 693-4228, or e-mail mailto:Omalley-Theresa@dol.gov.	Online comments to DOT's Dockets Management System (DMS) website at <a href="http://dms.dot.gov">http://dms.dot.gov</a> . You may fax your comments to the DMS at (202) 493-2251. By mail or in person to the U. S. Department of Transportation (DOT), Office of Dockets and Media Management to the Docket Clerk, Docket No. OST-2002-11996, 400 Seventh Street, SW., Room PL401, Washington, DC 20590-0001.	Submitting comments via EPA's web page ( <a href="http://www.epa.gov/oei/qualityguidelines">www.epa.gov/oei/qualityguidelines</a> ) Comments may also be sent by e-mail to: <a href="mailto:quality.guidelines@epa.gov">quality.guidelines@epa.gov</a> , Attention: Docket ID No. OEI-10014. If you submit comments by U.S. mail, send two copies of your comments to: Evangeline Tsibris Cummings, Environmental Protection Agency, Office of Environmental Information, Mail Code 2842T, 1200 Pennsylvania Avenue, N.W., Washington, DC Attention: Docket ID No. OEI-10014
<b>Information Statement</b>	None	None	None	Commitment to Public Access - Extensive statement and explanation of the perceived benefit and importance of information dissemination
<b>Not Legally Binding</b>	Not mentioned	Yes	Yes	Yes detailed statement at the very start of the draft guidelines
<b>Dissemination Not Covered</b>	Standard - a few listed in text	Standard listed	Detailed list and mention of possible full exemption for information submitted by stat and local governments for grant programs	Detailed and well defined with some critical expansions such as the including organizations among the communication with individuals exemption
<b>Influential Information Definition</b>	Standard - with each agency granted the ability to define influential appropriate for the issues covered	Narrower -- standard definition presented but examples presented including examples of what is Non-influential	Narrower- Will implement use of a label for influential information	Narrow- 3 classes of information given as current types that count as influential and then the possibility to deem other information influential on a case-by-case basis
<b>SDWA</b>	Adapt	Either--left up to departments	No Mention	Adapt - with an important adaptation that "best available" will be interpreted as best available at the time of the report or assessment
<b>Request Requirements</b>	1) description of information to be corrected including its location 2) reasons why information is thought to be in error including supporting evidence 3) recommendations for corrective action 4) description of how requestor is affected by the information error 5) contact and identification information	1) Contact and identification information 2) specify the information being contested 3) describe the nature of the complaint including why information does not comply with guidelines 4) reason why agency should make the change	1) Indicate this is a request for correction 2) Contact information 3) explain how they are affected by information 4) identify the report or dataset containing the info 5) specify the information being contested including what aspect needs to be corrected 6) how information does not comply with guidelines 7) recommendations for corrective action 8) if not a designated report, dataset ,etc. why should guidelines apply 9) documentary evidence	1) Indicate this is a request for correction 2) Contact and identification information 3) description of information being contested 4) explain how the information does not comply with guidelines and recommend corrective action
<b>Timeliness requirement</b>	No for initial request; 30 days for appeal	No for initial request; but for appeal 30 days from decision or 120 days from original complaint whichever is longer	Yes - 1 year from initial dissemination and 30 days for an appeal	No
<b>Affected Person Requirement</b>	Yes	No	Yes	No
<b>Affected Persons Definition</b>	None	None	Standard	Standard
<b>Requests</b>	Decentralized - Unclear	Unclear	Decentralized	Decentralized
<b>Request Decisionmaker</b>	Requests are sent out to respective agencies within HHS but unclear within the agencies-- up to each agency	Left up to agencies under DoL	unclear - seems to be that data quality officials in DOT organizations will be notified	Information owners- designated responsible persons in applicable program
<b>Appeals</b>	Unclear	Unclear	Decentralized	Decentralized
<b>Appeal Decisionmaker</b>	Unclear only noted that should not be handled by same official that handled original request	Noted that should not be handled by same official that handled original request or office that prepared the information	Designate a reconsideration official with objectivity and reasonable knowledge of subject matter could be in organization responsible for information or another DOT organization	Assistant Administrator of program office or Regional Administrator with recommendations from specially formed executive panel chaired by CIO
<b>Request Response Time</b>	45 days	90 days	45 days rejection 90 days response	No
<b>Appeal Response Time</b>	None mentioned but likely 45 days same as requests	90 days	90 days	No

## OMB Watch Comparison Chart for Drafts of Data Quality Guidelines

Agency or Department	Federal Energy Regulatory Commission	Food and Drug Administration	National Institutes of Health	National Science Foundation
<b>Comments Due</b>	7-Jun-02	31-May-02	31-May-02	3-Jun-02
<b>Contact</b>	Federal Energy Regulatory Commission, 888 First Street, NE., Washington, DC 20426. FOR FURTHER INFORMATION CONTACT: Elizabeth A. Taylor, Office of the Chief Information Officer, Federal Energy Regulatory Commission, 888 First Street, Washington, DC 20426, (202)208-0826, e-mail: Elizabeth.Taylor@ferc.gov.	Please submit written comments to Director, Division of Data Policy, Office of the Assistant Secretary for Planning and Evaluation, Attn: Information Quality Comments, U.S. Department of Health and Human Services, Room 440D, Hubert H. Humphrey Building, 200 Independence Avenue SW., Washington, DC 20201. Comments also may be e-mailed to Info.comments@hhs.gov.	Please submit written comments to Director, Division of Data Policy, Office of the Assistant Secretary for Planning and Evaluation, Attn: Information Quality Comments, U.S. Department of Health and Human Services, Room 440D, Hubert H. Humphrey Building, 200 Independence Avenue SW., Washington, DC 20201. Comments also may be e-mailed to Info.comments@hhs.gov.	Comments may be submitted via electronic mail to infoqua1515@nsf.gov, via mail to Section 515 Information Quality Officer; 4201 Wilson Blvd., Suite 305; Arlington, VA 22230; or via fax to (703) 292-9084.
<b>Information Statement</b>	None	None	Within agency mission a statement that It is NIH policy to make available to the public the results and accomplishments derived from the activities that it funds. Therefore NIH investigators are expected to make results available to research community and public and effect timely transfer to industry for commercialization	Mention that NSF policy is to make the fullest possible disclosure of information
<b>Not Legally Binding</b>	Not mentioned	Not mentioned	Not mentioned	Yes
<b>Dissemination Not Covered</b>	Standard listed	Standard shortened list	Standard listed - specifies National Library of Medicine databases, other archival records, CRISP and similar databases as well as information from grantees	Standard full list
<b>Influential Information Definition</b>	Standard	Narrower - Starts with standard definition and that each agency granted the ability to define influential appropriate for the issues covered then proposes information that supports regulatory actions expected to have annual effect on economy of \$100 million or more--2 examples are provided	Narrower - Standard definition followed by examples of four types of NIH information that would qualify	Standard
<b>SDWA</b>	No Mention	Adapt	No Mention	No Mention
<b>Request Requirements</b>	1) Contact information 2) Indicate this is a request for correction 3) describe how information guidelines are not being met 4) specify the information being contested 5) describe how it should be corrected 6) any other relevant information	1) Indicate this is a request for correction 2) Contact and identification information 3)Specify the information being contested 4) Name of report or data product where information is located including issuance date 5) why the information should be corrected (how information does not comply with guidelines) and recommend how it should be corrected	1) Indicate this is a request for correction 2) specify the information being contested including where the material is located 3) why the information is believed to incorrect with any supporting documentation 4) suggest corrective actions 5) explain interest in material and relationship in terms of familiarity and/or expertise with the information 6) contact and identification information	1) contact and identification information 2) description of information being contested including the "correction" you would recommend 3) description of how you are adversely affected by information 4) reason the information should be corrected including recommendation for corrective actions and supporting documentation
<b>Timeliness requirement</b>	No	No	No for initial request; 30 days for appeal; and also timeliness of information mentioned as a factor in deciding the degree of correction appropriate	No for initial request; 30 days for appeal
<b>Affected Person Requirement</b>	No	No	No	Yes
<b>Affected Persons Definition</b>	None - note that as defined by Paperwork reduction Act	None	None	None
<b>Requests</b>	Decentralized	Decentralized possibly centralized	Decentralized	Unclear
<b>Request Decisionmaker</b>	Requests forwarded to appropriate official from Office of External Affairs	Requests begin with employee or division that disseminated the information or Ombudsman	Originating IC Director or designee (Scientific Director, Branch Chief, etc)	Unclear although likely to be decentralized to officials in areas covering information
<b>Appeals</b>	Centralized	Decentralized shifting to Centralized	Unclear	Centralized
<b>Appeal Decisionmaker</b>	FERC's Dispute Resolution Service	Appeals move up the chain of command all the way to Commissioner of FDA or Ombudsman Office	Unclear only noted that should not be handled by same official that handled original request	CIO handles or designates
<b>Request Response Time</b>	60 Days	Based on time frames in existing FDA dispute resolution procedures	45 working days	30 working days
<b>Appeal Response Time</b>	60 Days	Based on time frames in existing FDA dispute resolution procedures	None mentioned	30 working days

## OMB Watch Comparison Chart for Drafts of Data Quality Guidelines

Agency or Department	Nuclear Regulatory Commission	Occupational Safety and Health Review Commission	Office of Management and Budget	State Department
<b>Comments Due</b>	30-May-02	31-May-02	14-Jun-02	31-May-02
<b>Contact</b>	Comments may be mailed to Information Quality, c/o Vicki Yanez, Web, Publishing, and Distribution Services Division, Office of the Chief Information Officer, Mail Stop: T6-E7, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, e-mailed to infoquality@nrc.gov, or faxed to 301-415-5272. Comments may also be submitted at the NRC Web site information quality comment form that is accessible from NRC's "Contact Us" Web page ( <a href="http://www.nrc.gov/contactus">http://www.nrc.gov/contactus</a> ).	Send written comments to Linda Whitsett, Public Information Officer, One Lafayette Centre, 1120 20th St., NW., 9th floor, Washington, DC 20036-3419. FOR FURTHER INFORMATION CONTACT: Linda Whitsett, Public Information Officer, One Lafayette Centre, 1120 20th St., NW., 9th Floor, Washington, DC 20036-3419, phone (202) 606-5410, extension 215.	Please submit comments to Jefferson B. Hill of the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503. Comments can also be e-mailed to informationquality@omb.eop.gov.	David S. Newman, Attorney-Adviser, Office of the Legal Adviser, Department of State (telephone: 202/619-6982; email: dneuman@pd.state.gov). The address is Department of State, SA-44, 301 4th Street, SW., Room 700, Washington, DC 20547-0001.
<b>Information Statement</b>	Commitment to Information Quality with additional note later that "NRC believes that public involvement is key element of the information quality process and an important element of ensuring unbiased transparent analyses	None	None	None
<b>Not Legally Binding</b>	Yes - weak disclaimer at the end	Yes - Vague statement	Not mentioned	Yes
<b>Dissemination Not Covered</b>	Standard listed	One mentioned - adjudication information		Standard in appendix with some detail and examples
<b>Influential Information Definition</b>	Narrower -- standard definition presented but noted that for NRC only information that forms the technical basis for a substantive rulemaking that has substantial impact on an industry currently but could deem more on case by base	None	Standard	Standard - in appendix
<b>SDWA</b>	No Mention	No Mention	No Mention	No Mention
<b>Request Requirements</b>	1) Indicate this is a request for correction 2) Contact and identification information 3) description of information being contested including the source 4) explain why the information should be corrected and, if possible, recommend corrective action and any supporting evidence	None - Just that a written notice that it is believed that the agency has disseminated information that does not comply with guidelines	1) Indicate this is a request for correction 2) Specify the information being contested 3) what aspect needs to be corrected 4) explain how they are affected by information 5) how information does not comply with guidelines 6) what corrective action is sought	1) Contact and identification information including how you are affected by the information 2) specify the information being contested 3) Identify how information was disseminated 4) why information is incorrect
<b>Timeliness requirement</b>	No for initial request; 45 business days for appeal	No	No	Yes - 60 days from initial dissemination and 30 days for an appeal
<b>Affected Person Requirement</b>	No	No	No	Yes
<b>Affected Persons Definition</b>	None	None	Standard -- Persons who may benefit or be harmed by the disseminated information. This includes persons who are seeking to address information about themselves as well as persons who use information.	Narrower--includes both (a) persons seeking to address information about themselves or about other persons to whom they are directly related or publicly associated; and (b) persons that may reasonably be expected to experience significant adverse impact to their financial interests as a result of the information deficiency
<b>Requests</b>	Unclear	Unclear	Decentralized	Decentralized
<b>Request Decisionmaker</b>	Not specified at all	Requests sent central to CIO but not clear who decides	Divisions responsible for the subject area	Bureau responsible for subject area
<b>Appeals</b>	Unclear	Centralized	Centralized	Decentralized
<b>Appeal Decisionmaker</b>	Unclear only noted that should not be handled by same official that handled original request	Appeal sent to and response from agency Chairman	Executive Associate Director	Assistant Secretary within the bureau responsible for information
<b>Request Response Time</b>	45 business days	30 working days	60 Days	60 Days
<b>Appeal Response Time</b>	45 business days	60 working days	60 days	60 Days

## OMB Watch Comparison Chart for Drafts of Data Quality Guidelines

Agency or Department	US Consumer Product Safety Commission
<b>Comments Due</b>	1-Jul-02
<b>Contact</b>	Written comments should be captioned "Information Quality Guidelines" and mailed to the Office of the Secretary, Consumer Product Safety Commission, Washington, DC 20207, or delivered to that office, room 502, East- West Highway, Bethesda, Maryland 20814. Comments may also be filed by facsimile to (301) 504-0127 or by e-mail to cpsc-os@cpsc.gov, or by the Web site comment submission form at <a href="http://www.cpsc.gov/feedback.html">http://www.cpsc.gov/feedback.html</a> .
<b>Information Statement</b>	None
<b>Not Legally Binding</b>	Not mentioned
<b>Dissemination Not Covered</b>	Shortened standard list
<b>Influential Information Definition</b>	None
<b>SDWA</b>	No Mention
<b>Request Requirements</b>	1) identification information 2) description of information being contested 3) potential adverse impacts of information to be corrected 4) reason the information should be corrected.
<b>Timeliness requirement</b>	No
<b>Affected Person Requirement</b>	No
<b>Affected Persons Definition</b>	None
<b>Requests</b>	Unclear
<b>Request Decisionmaker</b>	request go to Office of Secretary but no indication as to who is responsible for decisions
<b>Appeals</b>	Centralized
<b>Appeal Decisionmaker</b>	Appeals submitted to Office of Executive Director but it may not be the final decisionmaker
<b>Request Response Time</b>	No
<b>Appeal Response Time</b>	No