



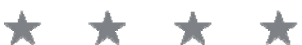
INFORMATION QUALITY GUIDELINES

December 2019

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch





INFORMATION QUALITY GUIDELINES

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I. PURPOSE

The Office of Government Ethics (OGE) exercises leadership in the executive branch to prevent conflicts of interest on the part of Government employees, and to resolve those conflicts of interest that do occur. In partnership with executive branch agencies and departments, OGE fosters high ethical standards for employees and strengthens the public's confidence that the Government's business is conducted with impartiality and integrity.

OGE issues these Information Quality Guidelines to describe the agency's policy for ensuring the quality, objectivity, utility and integrity of information that it disseminates to the public and to set forth the administrative procedures by which an affected person may obtain correction of disseminated information that does not comply with the guidelines.

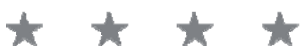
II. AUTHORITY

Each Federal agency is required to publish guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information that it disseminates to the public. Section 515 of the Treasury & General Government Appropriations Act for FY 2001 (Public Law No. 106-554). Each agency's guidelines must be based on government-wide guidelines issued by the Office of Management and Budget (OMB). After seeking comment on proposed government-wide guidelines, OMB published final guidelines (with certain provisions published on an interim final basis) in the Federal Register on September 28, 2001 (66 FR 49718). Revised final guidelines were published by OMB on January 3, 2002 (67 FR 369), then republished with corrections on February 22, 2002 (67 FR 8452). In April 2019, OMB issued Memorandum M-19-15 to reinforce, clarify, and interpret agency responsibilities with regard to the requirements of the Information Quality Act. These guidelines supersede and update OGE's original 2002 guidelines, to comply with OMB's most recent guidance.

III. DEFINITIONS

Terms used in these guidelines are defined by reference to definitions in OMB guidance, as follows:

- a. "Quality" includes the utility, objectivity, and integrity of information.
- b. "Utility" refers to the usefulness of information for its intended purpose.
- c. "Objectivity," refers to whether disseminated information presented is accurate, reliable, and unbiased as a matter of presentation and substance.
- d. "Integrity" refers to data security (e.g., protection of the information from unauthorized access or revision to ensure that it is not compromised through corruption or falsification).





- e. “Information” means any communication or representation of knowledge, such as facts or data, in any medium or form, including textual, numerical, graphic, narrative, or audiovisual forms. It includes information disseminated on OGE’s website, but does not include the provision of hyperlinks to information that others disseminate. The term also does not include opinions, where OGE’s presentation makes it clear that what is being offered is someone’s opinion rather than fact or OGE’s views.
- f. “Influential information” means that OGE can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions. Even if information has a clear and substantial impact, it is not “influential” if the impact is not on a public or private decision that is important to policy or other decisions. The “influential” designation is only infrequently applied to information that is disseminated by OGE, and generally pertains only to statistical information.
- g. “Dissemination” means agency-initiated or sponsored distribution of information to the public (*see* 5 C.F.R. section 1320.3(d) (definition of “Conduct or Sponsor”)). Dissemination does not include distribution of information that is:
 - Limited to government employees, agency contractors or grantees;
 - Intra- or inter-agency use or sharing of government information;
 - Responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar law;
 - Correspondence with individuals or persons;
 - Archival records;
 - Public filings;
 - Subpoenas; or
 - Subject to adjudicative processes.

IV. SCOPE AND APPLICABILITY

OGE maintains an active outreach program that provides a variety of information about the agency's mission, programs, and operations through various sources, including primarily its website. Primary target audiences for these outreach efforts include: agency ethics officials; current and former executive branch employees; nominees and applicants for federal positions; members of Congress; the press; and the public.

OGE uses a variety of tools in its outreach efforts, including primarily the agency website (www.oge.gov). OGE does not usually disseminate materials directly to the public but information is made publicly available (generally on the OGE website) as a by-product of the dissemination of that information to other target audiences (such as guidance issued to ethics officials); transmittal of reports to Congress and other agencies; publication of regulations and required notices in the Federal Register; and through publication of other materials issued by OGE in the performance of its work.





OGE seeks to foster public trust in the executive branch ethics program and executive branch decision making. As indicated in the above description of OGE’s target audience and in the definition of “dissemination” as stated in OMB guidance and Public Law 106-554, the majority of information OGE disseminates is exempt from information quality guidelines. Specifically, exempt OGE documents include, but are not limited to:

- Opinions of legal policy or interpretation regarding laws and regulations relevant to the executive branch ethics program;
- Public and confidential financial disclosure reports;
- Guidance (written or visual) provided to ethics officials; and
- Reports and guidance collected from federal agencies about the executive branch ethics program.

Generally, the OGE Branch Chief and Division Head covering the program unit developing information for dissemination is responsible for reviewing its content, and for periodic reviews/updates of the information to ensure that it is current and reflects changes in laws, regulations, policies, and recent court decisions. OGE documents are prepared by subject matter experts on a particular topic, and are routed through relevant OGE Branch Chiefs and Division Heads, and the Director of OGE for review and approval prior to dissemination.

OGE generally does not develop or disseminate specific categories of information cited by OMB guidance that may require higher and more specific quality standards (e.g., influential scientific, financial or statistical information, and reports prepared by non-governmental entities). However, any information that is prepared by OGE and intended for public release undergoes a stringent review process that ensures the information is of an appropriate level of quality based on the likely use of the information. *See* Section III (Definitions).

The correction and appeal process for addressing data quality challenges does not apply to information disseminated by OGE through a comprehensive public comment process, such as *Federal Register* notices of proposed rulemakings, requests for comments on information collections subject to the Paperwork Reduction Act, and other documents for which OGE solicits public comments. Persons questioning the quality of information disseminated in those documents, or documents referenced or relied upon in those documents, must submit comments as directed in the *Federal Register* or other notices requesting public comment on the given documents. OGE will use its existing processes for responding to public comments in addressing the request for correction, and will describe the actions it has taken with regard to the request in the *Federal Register* notice of the final agency rule or other final action.





V. **QUALITY STANDARDS, ADMINISTRATIVE REVIEW PROCEDURES AND ADMINISTRATIVE CORRECTION MECHANISMS**

A. **Quality Standards**

In all phases of the pre-dissemination review, the following Quality Standards should be applied:

1. ***Information should adhere to a basic standard of quality.*** Quality (including the objectivity, utility and integrity) of information to be disseminated by OGE to the public should be an integral component in every phase of the development of such information.
2. ***Information should be objective in substance and presentation.*** Accurate, reliable, and unbiased information should be presented in a clear, complete, and unbiased manner in a proper context, with identification of sources (to the extent possible, consistent with confidentiality protections). To ensure that the information is objective, it should relate to issues within OGE's jurisdiction.
3. ***Information should be responsive to its intended users.*** Information should meet the needs of its intended users, including the public, with due regard for the costs and benefits involved. Needs of intended users will be determined by OGE, in part, through feedback or frequently asked questions at agency outreach activities. At a minimum, information developed and disseminated by OGE should, whenever possible, be written in plain, understandable language.
4. ***If information is determined to be "influential," OGE will address other aspects for dissemination to the public.*** If statistical information to be disseminated by OGE is determined to be influential, OGE generally will ensure that the information contains a high degree of transparency about the data and methods used to facilitate the reproducibility of the information by qualified individuals or groups. Influential statistical information can include original and supporting data or analytic results. With regard to analytic results, if the data is identified as influential and can be made available publicly, OGE will provide sufficient transparency about the data, and the methods used to analyze it to enable an independent analysis by a qualified individual or group. Where data cannot be publicly disclosed, OGE will use rigorous statistical checks on analytic results, document the checks undertaken, and disclose the specific data sources, quantitative methods, and assumptions used.
5. ***The integrity of information should be protected.*** OGE ensures appropriate security measures are in place to protect information on its website from unauthorized access or revision. In carrying out that responsibility, OGE: (a) implements applicable new software patches and security guidelines as recommended by federal agencies responsible for guidance on information security issues; (b) routinely monitors web server event logs to identify potential breaches of security; and (c) maintains backups of website and web server content to permit OGE to promptly restore the agency





website if its security is threatened or the system fails due to hardware or software errors.

B. Administrative Review Procedures

OGE conducts fitness for purpose and pre-dissemination reviews for all information products prior to their dissemination. It is the responsibility of the Division Head and Branch Chief of the program unit developing the information for dissemination (hereafter collectively referred to as the “Lead Division”) to pursue the most knowledgeable and reliable sources reasonably available to confirm the objectivity and utility (as defined in Section V above) of such information. It is also the Lead Division’s responsibility to review and verify data submitted by the other government agencies, as necessary and appropriate, prior to dissemination.

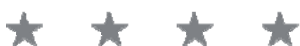
OGE follows a basic clearance process coordinated by the Lead Division. The Lead Division consults with other OGE Divisions or stakeholders having substantial interest or expertise in the material to be released or published. Where appropriate, substantive input is sought from other government agencies or entities, non-government organizations, and the public.

C. Administrative Correction Mechanisms

Affected members of the public who believe that information disseminated by OGE does not comply with OMB or OGE guidelines may contact OGE to request correction of the information. Such persons (“requesters”) should write to the Chief Data Officer, at the U.S. Office of Government Ethics, Suite 500, 1201 New York Ave., NW, Washington, DC 20005-3917, or via email at Contact@oge.gov.

Initial requests should include all relevant information available to the requester, and a clear statement of the alleged conflict with OMB or OGE guidelines. OGE will reject requests made in bad faith or without justification. The Chief Data Officer will refer the request for response to the Lead Division responsible for development and/or maintenance of the information.

OGE will respond to an initial request within 60 calendar days after its receipt (or sooner, if it is possible to quickly resolve the request and immediate attention is necessary due to the nature of the information). If the request requires more than 60 calendar days to resolve, OGE will inform the requester that more time is required, and will indicate the reason why and provide an estimated decision date, not to exceed 120 days from the date of the request. If more than 120 days is needed to respond to an initial request, concurrence of the requestor will be obtained. The Lead Division to which the request has been referred will respond by letter to the requester. The letter will inform the requester whether OGE believes a correction is appropriate, given the nature and timeliness of the information involved, and if so, will provide any corrected information.





If OGE's initial response is not acceptable to the requester, it may be appealed. The requester must send an appeal within 60 calendar days of the date of OGE's response to the initial request for corrections. Any appeal should be addressed to the Program Counsel, U.S. Office of Government Ethics, Suite 500, 1201 New York Avenue, N.W., Washington, D.C. 20005-3917, and must state the reason(s) why the initial decision was not acceptable. An appeal may be submitted to OGE by mail or by email directed to Contact@oge.gov.

If OGE believes that other agencies may have an interest in the resolution of an appeal, OGE will consult with those agencies about their possible interest before completing its review of the appeal. Within 60 calendar days after OGE receives the appeal, the Program Counsel will respond by letter informing the requester whether the appeal is granted (that is, the letter will state whether a correction is appropriate given the nature and timeliness of the information involved, and if so, will provide any corrected information). If an appeal requires more than 60 calendar days to resolve, OGE will inform the requester that more time is required, and will indicate the reason why, and provide an estimated decision date.

VI. REPORTING PROCEDURES

OGE will report annually to OMB on the number and type of complaints received about OGE's compliance with OMB's information quality guidelines, and how such complaints were resolved.

VII. INFORMATION CONTACT

For questions or comments regarding these guidelines, contact the Chief Data Officer at Contact@oge.gov.

VIII. EFFECTIVE DATE

As these guidelines supersede guidelines originally issued by OGE in 2002, they continue to apply to information disseminated by OGE (as defined in the OMB guidelines and various updates to those guidelines) on or after October 1, 2002.

IX. EXPIRATION

These guidelines will remain in effect until expired or superseded.

