



Program Statement

OPI: IPD
NUMBER: 1351.06
DATE: 9/29/2003
SUBJECT: Information Quality
Guidelines

1. **PURPOSE AND SCOPE.** To provide information to the public through a variety of timely and cost-effective publications and other written communications.

- ◆ The purpose of these communications is to inform the public of the Bureau's mission, goals, operations, programs, and services and the issues and challenges facing a modern corrections agency.
- ◆ This program's purpose is to maximize the quality, objectivity, utility, and integrity of information the Bureau provides to the public.

2. **PROGRAM OBJECTIVES.** The expected results of this program are:

a. Information provided to the public will be reviewed thoroughly to ensure its quality, objectivity, utility, and integrity.

b. Members of the public will be able to seek and obtain correction of information.

c. The program will be monitored and an annual report made to Justice Management Division of the Department of Justice.

d. Data will be collected on the number and nature of complaints received regarding public information and decisions, appeals, and decisions on the appeals.

3. DIRECTIVES REFERENCED

PS 1237.11	Information Security Programs (10/24/97)
PS 1237.12	Information Resources Protection (4/14/99)
PS 1351.05	Release of Information (9/19/02)
PS 1411.01	Employee Speeches and Publications Review Process Policy (1/28/99)
PS 1480.05	News Media Contacts (9/21/00)
PS 1580.05	Audiovisual Productions (3/29/02)

OMB memorandum titled "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" (2/22/02), and published in the Federal Register, Vol. 67, No. 36, at 8452

Department of Justice memorandum titled "DOJ Information Quality Guidelines for Information Disseminated to the Public," (9/2/02)

OMB Circular No. A-130 (Revised) (11/28/00), "Management of Federal Information Resources"

Public Law 106-554, the Treasury and General Appropriations Act for Fiscal Year 2001, Section 515

5 U.S.C. § 552

4. STANDARD REFERENCED

a. American Correctional Association 2nd Edition Standards for the Administration of Correctional Agencies: 2-CO-1A-25

b. American Correctional Association 3rd Edition Standards for Adult Correctional Institutions: 3-4021

5. DEFINITIONS

a. **Information provided to the public** is any communication such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms (see exceptions listed in Section 11).

◆ It requires that the Bureau has either initiated or sponsored the distribution of the information.

◆ It includes information provided from the Bureau's website.

b. **Influential Information.** For information to be considered "influential," it must meet both of the following criteria:

- (1) The information has or is expected to have a genuinely clear and substantial impact at the national level.
 - ◆ Clear and substantial impact is one that the bureau is firmly convinced has a high probability of occurring.
 - ◆ If it is merely arguable that an impact will occur, or if it is a judgement call, then the impact is probably not clear and substantial.
- (2) The information has a genuinely clear and substantial impact on **major** public policies or private sector decisions that are expected to occur.

This information's accuracy is significant due to the critical nature of these decisions.

- ◆ Even if information has a clear and substantial impact, it is not influential if the impact is not on an "important" public or private decision.
- ◆ **Influential statistical information** is a subset of this category.

c. **Quality** is a term that includes utility, objectivity, and integrity.

- (1) **Utility** refers to the information's usefulness.
- (2) **Objectivity** ensures that information is accurate, clear, complete, and unbiased. Objectivity is achieved by:
 - ◆ using valid, reliable data,
 - ◆ performing sound analyses,
 - ◆ documenting data sources and methods of analysis,
 - ◆ performing rigorous checks,
 - ◆ having the data available for replication of the analytical results, and
 - ◆ ensuring the information is capable of being substantially reproduced and peer reviewed.

- (3) **Integrity** refers to the security of the information, specifically, protections from falsification, corruption, unauthorized access, or unauthorized revision.

6. RESPONSIBILITIES

a. The **Assistant Director for Information, Policy, and Public Affairs (IPPA)** is responsible for this Program Statement.

b. The **Executive Assistant, IPPA** is the point of contact. The Executive Assistant will track all requested information and associated documentation related to information quality and requests for correction including:

- ◆ the reason for the request,
- ◆ the Bureau's initial decision,
- ◆ whether there was an appeal, and
- ◆ the result of the appeal.

c. The **Office of the Executive Secretariat** is responsible for assigning and tracking requests for correction of previously furnished information through the controlled correspondence system.

7. STANDARDS FOR PROVIDING INFORMATION

a. Information provided to the public should include:

- ◆ methodologies,
- ◆ origins of data, and
- ◆ limitations of the information, if appropriate.

b. Research findings and statistical information will be based on sound research methods and statistical analysis. The document containing this information needs to include a description of:

- ◆ the methods,
- ◆ data sources,
- ◆ assumptions, and
- ◆ any related information.

8. REVIEW OF INFORMATION TO BE PROVIDED TO THE PUBLIC

a. Before information is provided to the public, the chief executive officer (CEO) (or designee) of the institution that created the information must approve it.

- ◆ Approval of the information's release cannot be designated below the CEO level.

b. The employee must submit any information provided to the public through a means other than the Bureau website to his or her supervisor for review, approval, and submission to the CEO for final approval.

c. When information is developed for placement on the Bureau website, the employee must submit the material to his or her supervisor for review, approval, and submission to the CEO for final approval.

- ◆ If the information is to be placed only on an institution intranet homepage, no other level of review and approval is required.
- ◆ If the information is for placement on other than the institution's homepage, the CEO will submit the information to the Assistant Director, IPPA for final approval.

9. INFORMATION CORRECTION REQUESTS

a. Members of the public may challenge information and seek correction by writing to the Bureau.

- ◆ Requests for correction must be sent to the Office of the Executive Secretariat.
- ◆ The Office of the Executive Secretariat will assign the request to the appropriate institution or regional office and will alert the Executive Assistant, IPPA of the request and the Bureau's response.
- ◆ The Executive Secretariat will consider such requests and appeals to responses to these requests to be controlled correspondence to ensure the Bureau meets the time frames stipulated in the Department of Justice (DOJ) Information Quality Guidelines.
- ◆ The initial response to the request must state that the requestor can appeal the initial decision if he or she is not satisfied with the decision. (Appeals procedures are listed in Section 10.)

b. The Executive Assistant, IPPA will ensure that a notice regarding the ability to seek corrections to information provided to the public is made available (e.g., through appropriate Bureau publications and on the Bureau website).

The notice will state that a request for correction of information must include:

- ◆ A statement that the request is submitted pursuant to Information Quality Guidelines issued by the Department of Justice and the Bureau of Prisons.
- ◆ Contact information about the requestor including:
 - name,
 - address,
 - phone number, and
 - organizational affiliation (if any).
- ◆ A description of the information, such as publication title, date, page, web page address (URL), graph, table, chart, column, row, etc., for which a correction is being sought.
- ◆ An explanation of how the information is incorrect or does not comply with the Office of Management and Budget (OMB) and/or DOJ Information Quality Guidelines.
- ◆ An explanation of the alleged error's harmful effect and how a correction would benefit the requestor.
- ◆ A recommendation on how the information should be corrected and an explanation of why the DOJ should adopt the recommendation.
- ◆ Any evidence supporting the request for correction.

The notice will also mention that:

- ◆ The requestor bears the burden of proof with regard to the need for a correction of information and the type of correction that is sought,
- ◆ The Bureau will not attempt to contact the requestor for additional information, and
- ◆ The requestor has one opportunity to appeal the Bureau's decision within 35 days of receiving the Bureau's response.

10. INVESTIGATING A REQUEST FOR CORRECTION OF INFORMATION PROVIDED TO THE PUBLIC

a. The investigation of a request will take into account the process used to create and provide the information and the conformity of the information to OMB and DOJ Information Quality Guidelines.

b. Any corrective action will be determined by:

- ◆ the nature and timeliness of the information,
- ◆ the significance of the error,
- ◆ the magnitude of the error, and
- ◆ the cost of corrective action.

c. The Bureau will not respond to frivolous or repetitive requests for correction of information nor to requests from individuals who are not affected by the information.

d. Appeals to an initial request will be investigated and responded to by an official at a level of review either above or comparable to the level of the official who responded to the initial request.

e. To ensure objectivity regarding influential statistical information, the official investigating a request for correction to such information may forward a request or appeal to the statistical review committee in the DOJ's Justice Management Division.

11. EXCEPTIONS

a. This PS does not override other compelling interests, such as privacy and intellectual property.

b. This PS does not apply to documents when the material is being offered as someone's opinion rather than the Bureau's position.

c. The guidance in this PS does not apply to information disseminated in the following situations:

- ◆ limited to government employees or agency contractors or grantees;
- ◆ intra-agency or inter-agency use or sharing of government information;

- ◆ responses to requests for agency records under the Freedom of Information Act, the Privacy Act, or other similar laws;
- ◆ distribution limited to correspondence with individuals or persons;
- ◆ press releases and public filings;
- ◆ information related to subpoenas or adjudicative processes;
- ◆ archival records disseminated by Federal agency libraries or similar Federal data repositories;
- ◆ information presented to Congress as part of the legislative or oversight processes (e.g., official agency testimony or information provided to a Member of Congress to educate or inform that Member about the Bureau) that is not also disseminated to the public;
- ◆ employee-authored articles and manuscripts that are not the official position of the Bureau (see the Program Statement on Employee Speeches and Publications Review Process);
- ◆ procedural, operational, policy, and internal manuals prepared for the Bureau's management and operations that are not primarily intended for public dissemination; and
- ◆ information disseminated to the public with a defined public comment period.

/s/

Harley G. Lappin
Director