U.S. Department of Education Information Quality Guidelines

Contents

Introduction

Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554) (Information Quality Act) directed the U.S. Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies."

OMB's guidelines, issued on February 22, 2002 (67 Fed. Reg. 8452) (OMB 2002 Guidelines), directed agencies to: (1) Develop and implement their own agency-specific information quality guidelines by October 1, 2002; (2) Adopt a basic standard of quality (including objectivity, utility, and integrity) as a performance goal and incorporate the standard into the agency's operations; (3) Develop a process for reviewing the quality of information to ensure quality before information is disseminated; (4) Establish a process for affected persons to request correction of information that may not comply with OMB's or the agency's guidelines; and (5) Report annually to the Director of OMB, beginning January 1, 2004, the number and nature of complaints received by the agency regarding the agency's compliance with its guidelines concerning the quality, objectivity, utility, and integrity of information, and how such complaints were resolved.

The U.S. Department of Education's (the Department's) guidelines were originally developed in 2002 at the direction of OMB. On April 24, 2019, OMB issued a Memorandum to the Heads of Executive Departments and Agencies (M-19-15) to reinforce, clarify, and interpret agency responsibilities under the Information Quality Act. The Department issued interim guidelines in 2019 to implement updates in response to OMB's Memorandum. The updates in this document supersede and streamline the 2019 interim guidelines. These guidelines, along with those issued by OMB, represent a performance goal for the Department and are intended only to improve the internal management of the Department. They do not create any private right of action to be used by any party against the government in a court of law or in an administrative hearing. The Department's process for receiving and reviewing information correction requests is described below.

Definitions, Structure, and Scope

OMB defines "quality" as encompassing "utility," "objectivity," and "integrity." These guidelines outline procedures to meet these three quality standards in our information. "Utility" refers to the usefulness of the information for the intended audience's anticipated purposes. "Objectivity" focuses on whether disseminated information is accurate, reliable, and unbiased and whether that information is presented in an accurate, clear, complete, and unbiased manner. "Integrity" refers to security—the protection of information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification. These and other definitions can be found in Appendix A at the end of these guidelines.

The Department seeks to ensure a basic standard of quality for disseminated information throughout the entire data management lifecycle.[1] Reflecting critical stages in that lifecycle and in alignment with OMB guidance, these guidelines are structured into two components:

- Quality in Information Collection and Creation (for data assets that will be disseminated publicly)
- Quality in Information Dissemination (for data assets that will be disseminated publicly)

These guidelines are effective six months after publication. They generally apply to Department data assets that are disseminated to the public[2] throughout the data management lifecycle as required by OMB's 2019 implementation guidance.[3] To the extent necessary to comply with statistical laws, the Chief Data Officer (CDO) delegates their responsibilities to the Statistical Official (SO) for the application of these guidelines to data acquired, maintained, or disseminated under statistical law.[4] As the agency champion for data quality,[5] the SO will work with the CDO to coordinate the implementation of these guidelines.

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[1] Data management lifecycle is defined in the Department's Data Governance Policy (DGP-21-01) on Data Management Lifecycle.

[2] In accordance with the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554) (Information Quality Act) and associated OMB Guidance, these guidelines are applicable to both statistical and non-statistical information.

[3] OMB M-19-15: Improving Implementation of the Information Quality Act.

[4] 44 U.S. C. 3520(d): Evidence Act.

[5] OMB M-19-23: Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance.

An inventory of the Department's data assets as well as any influential information disseminated will be maintained and made available for public inspection in the Department's comprehensive data inventory[6] in accordance with privacy, confidentiality, and security policies, regulations, and processes.

The Department seeks to promote data-related innovation and analysis. Pre-decisional information is not disseminated, and therefore, is not subject to these guidelines. In addition, data assets that are disseminated by the agency generally are subject to these guidelines. Additional instances where these guidelines are not applicable can be found in Appendix B at the end of these guidelines.

Quality in Information Collection and Creation

The Department treats information quality as integral to every step of an agency's development (resulting in eventual dissemination) of information, including creation, collection, and maintenance of its data assets. As a matter of good and effective agency information resources management, the Department will use the following process for reviewing the quality (including the objectivity, utility, and integrity) of information before it is disseminated. This process enables the agency to substantiate the quality of the information it disseminates through documentation and other means appropriate to the information.

1. In seeking to ensure objectivity, utility, and integrity in the Department's data, all publicly disseminated data assets should have a documented data quality plan, with the exception of emergency information collections that require a data quality plan at the point of the six-month submission. Principal operating components (POCs) within the Department create this data quality plan prior to the submission of an Information Collection Request.

2. Any POC-requested deviation from the established data quality plan template requires written notification to the CDO prior to development of the plan. This most often occurs when advanced data collections, such as those conducted by the Institute of Education Sciences, contain data quality plans that exceed the minimum standards reflected in the data quality plan template. The Office of the Chief Data Officer (OCDO) may also offer nonbinding recommendations to deviate from the approved data quality plan template to accommodate the needs of high-priority data assets. In all instances, data quality plans will address, at a minimum, the domains of data quality:

    a. Utility: To evaluate the overall utility for a data asset, the POC will identify its primary uses. The information collection request submitted to OMB will identify the statutory and/or regulatory requirements for collecting the data.[7] To avoid creating unnecessary burden, POCs should research whether data exists that can be used or augmented for statistical and research purposes.

[6] The Foundations for Evidence-Based Policymaking Act of 2018 (Public Law 115-435) requires every federal agency to develop and maintain a comprehensive data inventory that accounts for all data assets created by, collected by, under the control or direction of, or maintained by the agency.

[7] To further document data value, the data quality plan may also document, if applicable, how that data supports the Department's Learning Agenda, make use of established identifiers and other keys supporting interoperability, or have other characteristics increasing its strategic value. The POC is encouraged to consult the Department's Evaluation Official and Statistical Official to identify and document secondary uses.

b. Objectivity: The POC will identify strategies to ensure the data are fit for purposes established by the POC.[8] The strategies will include any quality controls that ensure the data submitted to the Department about a third party (for example, data reported by a grantee about a subgrantee) meet the POC's quality standards. The POC will also identify key data quality measures and targets in alignment with its intended purposes (for example, tolerance levels for completeness).

c. Integrity: To ensure integrity in Department data assets,[9] POCs will work with the Office of the Chief Information Officer (OCIO) and the Student Privacy Policy Office (SPPO) to develop system and access requirements and associated security and privacy controls. If any planned data collection, creation, or management includes personally identifiable information (PII), the data stewards will consult with SPPO to conduct a Privacy Threshold Analysis (PTA) to determine if a Privacy Impact Assessment (PIA), System of Records Notice (SORN), and/or Privacy Act Statement are required in accordance with Section 208 of the E-Government Act of 2002. POCs should ensure data asset integrity measures are aligned with data asset utility and documented purposes.

3. Based on agency resources, strategy, and priority, OCDO, OCIO, SPPO, and the SO may review the data quality plan and provide nonbinding feedback on data quality plans.

4. At any point during the data management lifecycle[10] stages of development, testing, creation, collection, validation, storage, and processing, the POC may modify its data quality plan to address new challenges. OCDO, OCIO, SPPO, and the SO may review and provide nonbinding feedback on those modifications.

5. To determine whether underlying data are fit for Department purposes, the POC will assess the quality of the data prior to dissemination. That assessment will include evaluating any data quality measures and targets identified in Step 2b above.

6. To provide the public with an opportunity to assess whether Department data are fit for the public's purposes, selected information from data quality plans (as described in Step 1 above including any revisions from Step 5 above) and Department assessments of quality (as in Step 5 above) will be published in the Department's comprehensive data inventory for public inspection.

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[8] These strategies may include: (i) identification of civil or criminal penalties of knowingly submitting false data; (ii) strategies for communicating penalties for failure to submit quality data; (iii) strategies for providing technical assistance and other resources to those reporting data; and (iv) information technology solutions—such as business rules and system edits—that ensure reported data are accurate.

[9] Statutory and administrative guidelines to protect the integrity of Department information include (without limitation) the following: Privacy Act, as amended; Freedom of Information Act, as amended; OMB Circulars A-123, A-127, and A-130; National Institute of Standards and Technology (NIST) Special Publications (SP) 800 series; NIST Federal Information Processing Standards (FIPS); 32 CFR part 2002 – Controlled Unclassified Information (CUI); Federal Policy for the Protection of Human Subjects; Family Educational Rights and Privacy Act (FERPA); Federal Information Security Modernization Act of 2014 (FISMA); Federal Information Technology Acquisition Reform Act (FITARA); Foundations for Evidence-Based Policymaking Act (FEBPA); and National Education Statistics Act, as amended; and the E-Government Act of 2002, Section 208.

[10] DGP-21-01: Department's Data Governance Policy on Data Management Lifecycle.

7. The Department's comprehensive data inventory should list the specific data asset's point of contact for the public to submit any questions about a particular data asset and its level of quality.

Quality in Information Dissemination

The Department seeks to promote data-related innovation. Pre-decisional information, therefore, is not subject to these guidelines. The Department also seeks to promote use of evidence across all policy and operating decisions, even those that are routine and daily. As a result, except as expressly indicated below, there is no expectation that the Department document every use of data or evidence.

The Department has basic data quality standards for information dissemination. In general, each POC manages the following processes internally and is granted latitude in how and whether it chooses to document them:

1. The POC determines what information is deemed pre-decisional. Pre-decisional information is not disseminated, and therefore, no additional steps need to be taken.

2. The POC identifies a subject matter expert that will determine whether its data are fit for the purpose of each dissemination.[11]

3. The POC ensures all information disseminated is presented objectively. The POC might determine this can be achieved through an internal Departmental clearance process, where appropriate subject matter experts provide additional review. Where appropriate, POCs should retain computer code in the event the public requests to view it.

4. The POC is responsible for mitigating risk of disseminating PII (to include de-identified data that poses a re-identification risk). The POC achieves this through the Department's Disclosure Review Board (DRB) process, or processes approved by the agency's Senior Agency Official for Privacy (SAOP).

5. Within 90 days of creation or identification of the data asset, the POC publishes the data asset in the Department's comprehensive data inventory.[12]

Influential Information

Dissemination of information can be deemed influential if the Department 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. The Department, including each of its offices, is authorized to define "influential" in ways appropriate for it, given the nature and multiplicity of issues for which the bureau or component is responsible. It does not, however, include performance and financial data reported to the Department by a grantee when the authorizing official for the grantee has attested to the accuracy of the data with the understanding that providing any false, fictitious, or fraudulent information, or the omission of any material fact, may subject the official to criminal, civil, or

[11] For any data collected by a third party (for example, data purchased from a vendor), the POC is also responsible for ensuring those data are fit for the purpose of its dissemination. In addition, if POCs are considering secondary analysis of data that include PII, the POC should coordinate with the Department's SAOP and/or Privacy Program representatives to meet all privacy requirements and manage privacy risks.

[12] As required by 44 U.S.C. 3511(a)(3): Data inventory and Federal data catalogue.

administrative penalties for fraud, false statements, false claims, or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-33812).

The Department requires a higher degree of review of and transparency about data and methods used to produce influential information:

1. The head of each POC is responsible for determining whether information being disseminated qualifies as influential. Other Department officials (such as the Department's CDO, Evaluation Officer, and SO) may also recommend to the head of each POC influential information designations.

2. Prior to dissemination, influential information should undergo Department-sponsored peer review,[13] composed of members free of conflicts of interest that would preclude an objective evaluation of a product's accuracy, clarity, completeness, and freedom from bias, and who demonstrate sufficient methodological expertise to conduct an objective evaluation of a product's analytic sufficiency, the accuracy of research findings, and the appropriateness of the resulting conclusions. Where applicable, this review will include ensuring information complies with the Department's Scientific Integrity Policy and the Department's Evaluation Policy.[14]

3. Where not prohibited by law, regulation, or policy, all influential information should be reproducible, and available artifacts should, within 90 days of the Department's dissemination, be made available for public inspection on the Department's comprehensive data inventory. This includes all code used to generate findings, as well as reports on analysis of the data, analytical methods used, data sources, and known deficiencies in things such as the analytic methods or quality of data.

4. A POC may forego (for example, in emergency circumstances) or otherwise modify this peer review process upon written approval from the Secretary or the Secretary's delegate.

5. If the public has questions about these artifacts, they may contact the specific data asset's point of contact listed in the Department comprehensive data inventory. If a member of the public believes these artifacts were disseminated in a manner not in accordance with these guidelines, they should refer to the section on Information Correction Requests and Appeals.

Information Correction Requests and Appeals

Since October 1, 2002, the Department has allowed affected persons to request the correction of information the Department disseminates that does not comply with applicable OMB and Department information quality guidelines. An affected person is an individual or an entity that may use, benefit, or be harmed by the disseminated information at issue.

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[13] The Department-sponsored peer review for influential information should be conducted in accordance with OMB's Final Information Quality Bulletin for Peer Review, 70 Fed. Reg. 2664 (Jan. 14, 2005), specifically Sections I-V. In general, this Department-sponsored peer review shall be overseen by a panel developed by the Department's Evidence Act officials. It may also be satisfied through peer review processes authorized under 20 U.S.C. 9576(c).

[14] In accordance with OMB Memorandum M-20-12 ("Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices") the Department's Evaluation Policy can be found at www.ed.gov/data.

Most Department information products include the names of knowledgeable staff who can assist users in understanding the information presented, and in determining whether there is an error that warrants action using the correction process described in this section. Affected persons should consult with the contact person listed in the information product before filing a formal request for correction.

Information Correction Requests

In the Department's correction request process, the burden of proof rests with the requester. An affected person who believes that Department information does not adhere to the information quality guidelines of OMB or the Department, and who would like to request correction of specific information, needs to provide the following information:

- Identification of the requester (*i.e.*, name, mailing address, telephone number, and organizational affiliation, if any);
- A detailed description of the information that the requester believes does not comply with the Department's or OMB's guidelines, including name of the information collection, if it was part of an information collection; the disseminating office and author, if known; and a description of the specific item in question;
- Potential impacts on the requester from the information identified for correction (*i.e.*, describe the requester's interest in the information and how the requester is affected by the information in question);
- An explanation of the reason(s) that the information should be corrected (*i.e.*, describe clearly and specifically the elements of the information quality guidelines that were not followed); and
- A detailed description of the attempt(s) the requester made to consult with and resolve information quality issues directly with the contact person listed with the information product (as noted above).

Requesters shall submit requests to the following address: "InformationQuality@ed.gov." Requesters should indicate that they are submitting an Information Quality Request in the subject line of the e-mail.

Review

The Deputy Chief Data Officer (DCDO) for Governance and Strategy in OCDO will review the request and determine whether it contains all the information required for a correction request. If the request is unclear or incomplete, the Department will seek clarification from the requester.

If the request is clear and complete, the DCDO will forward it to the appropriate program office(s) for a response to the requester. The responsible office(s) will determine whether a correction is warranted, and if so, what corrective action it will take. Any corrective action will be determined based on the nature and timeliness of the information involved, the significance of the error on the use of the information, the magnitude of the error, and the cost of undertaking a correction.

Comments about information on which the Department has sought public comment, such as rulemaking or studies cited in a rulemaking, will be responded to through the public comment process or through an individual response if there was no published process for responding to all comments. The Department may choose to provide an earlier response, if doing so is appropriate and will not delay issuance of the final action in the matter.

The Department is not required to change the content or status of information simply based on the receipt of a request for correction. The Department may reject a request that appears to be made in bad faith or without justification. The responsible office(s) is only required to undertake the degree of correction that it deems appropriate for the nature and timeliness of the information involved. In addition, the Department need not respond substantively to requests that concern information not covered by the information quality guidelines.

Response

Unless the Department receives the concurrence of the party that requested the correction, the Department will respond to all requests for correction within 120 calendar days of the DCDO's receipt of a complete request, including requests that the Department elects not to process further.

For requests that merit review:

If the request is clear and complete, the Department's response will explain the findings of the review or will inform the requester if more time is needed to complete the review, the reason(s) for the additional time, and an estimate of the time it will take to respond. The Department's response should contain a point-by-point response to any information quality argument contained in the request and, if applicable, should refer to any peer review that directly considered the issue being raised. In its response, the Department should not opine on the requester's or the Department's policy position. The appropriate program office will be responsible for determining what action is necessary and, if an error was made, will determine the appropriate level of correction.

If the request is incomplete or unclear, the DCDO will seek clarification from the requester. In the case of an unclear or incomplete request, the requester may submit additional clarifying information if they so choose. However, the deadline for the Department's review and response will be based upon the date the clarifying information is received.

The Department may share draft responses to the request with OMB prior to release to the requester. Once a decision is made, the response will explain to the requester that they have a right to appeal the decision. Copies of all Department correspondence related to Information Quality Requests will be maintained by the OCDO.

Appeals

If a requester is not satisfied with the Department's decision on the request (including the corrective action, if any), they may appeal to the Department's CDO within thirty (30) calendar days of receipt of the Department's decision. This administrative appeal must include a copy of the initial request, a copy of the Department's decision, and a letter explaining why they believe the Department's decision was inadequate, incomplete, or in error.

This appeal shall be submitted to the following address: "InformationQualityAppeal@ed.gov." Requesters should indicate that they are submitting an Information Quality Appeal in the subject line of the e-mail.

The Department will ensure that all appeals undergo an impartial review and that those individual(s) reviewing and responding to the appeal were not involved in the review and initial response to the request for correction. In the case of appeals related to influential information, the Department's CDO will consult with the Department's Evaluation Officer and SO. The Department may share draft

responses to the appeal with OMB prior to release to the requester. The Department will respond to all appeals within 120 calendar days of the CDO's receipt of the appeal, or longer if the Department receives the concurrence of the party that requested the correction.

Reports

Under OMB's 2002 Information Quality Act Guidelines, the Department must annually report to the Director of OMB the number and nature of correction requests received by the Department regarding the Department's compliance with OMB's Information Quality Act Guidelines concerning the quality, objectivity, utility, and integrity of information and how such complaints were resolved. In this report, the Department should explain the practices it undertook to determine whether to correct information and, if the Department does not deny the correction request, the practices it undertook to determine the degree of correction appropriate for the nature and timeliness of the information involved.

Appendix A: Definitions

- **Data Asset:** A collection of data elements or data sets that may be grouped together.[15]
- **Data Management Lifecycle:** Stages associated with data management, including (1) business need, (2) definition and planning, (3) development and testing, (4) creation and collection, (5) validation, storage, and processing, (6) analysis, use, and dissemination, and (7) disposition and retirement.[16]
- **Dissemination:** agency initiated or sponsored distribution of information to the public.[17]
- **Influential Information:** Information that the Department 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. The Department, including each of its offices, is authorized to define "influential" in ways appropriate for it, given the nature and multiplicity of issues for which the bureau or component is responsible. It does not, however, include performance and financial data reported to the Department by a grantee when the authorizing official for the grantee has attested to the accuracy of the data with the understanding that providing any false, fictitious, or fraudulent information, or the omission of any material fact, may subject the official to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-33812).
- **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. This definition includes information that an agency disseminates from a web page, but does not include the provision of hyperlinks to information that others disseminate. This definition does not include opinions, where the agency's presentation makes it clear that what is being offered is someone's opinion rather than fact or the agency's views.[18]
- **Information Collection (collection of information):** The obtaining, causing to be obtained, soliciting, or requiring the disclosure to an agency, third parties or the public, of information by or for an agency by means of identical questions posed to, or identical reporting, recordkeeping, or disclosure requirements imposed on, ten or more persons, whether such collection of information is mandatory, voluntary, or required to obtain or retain a benefit.[19]
- **Integrity**: Refers to security of information—the protection of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification.
- **Objectivity**: From the perspective of information substance, a focus on whether information is accurate, reliable, and unbiased; from the perspective of information presentation, a focus on whether information is presented in an accurate, clear, complete, and unbiased manner.
- **Personal identifiable information**: PII is defined as information that can be used to distinguish or trace an individual's identity either alone or when combined with other personal or

[15] 44 U.S.C. 3502(17): Definitions of Federal Information Policy.
[16] DGP-21-01: Department's Data Governance Policy on Data Management Lifecycle.
[17] OMB M-19-15: Improving Implementation of the Information Quality Act
[18] 67 FR 8452: Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies.
[19] 44 U.S.C. 3502(1): Paperwork Reduction Act.

identifying information that is linked or linkable to a specific individual. PII is a broad concept, with examples including, but not limited to: names, such as full names, maiden names, or aliases; personal identification numbers, such as Social Security Numbers (SSNs), passport numbers, driver's license numbers, or credit card numbers; address information, such as street addresses or email addresses; personal characteristics, such as biometric data, fingerprints, photographs, or retina scans; and any information linked or linkable to one of the above, such as date or city of birth, race, ethnicity, gender or sex, religion, employment information, medical information, etc.

- **Pre-decisional information**: Often intended for deliberative purposes or to investigate a problem not yet clearly defined and sometimes referred to as exploratory analysis.
- **Quality**: The encompassing term of which "utility," "objectivity," and "integrity" are the constituents.
- **Utility**: Refers to the usefulness of the information to its intended users.

Appendix B: Information Not within Scope

These guidelines do not govern all information of the Department. For example, the guidelines generally **do not cover**:

- Internal information such as employee records;
- Internal procedural, operational, or policy manuals prepared for the management and operations of the Department that are not primarily intended for public dissemination;
- Pre-decisional information;
- Research findings and other information published by grantees, unless the Department –
    - Represents, uses, or relies upon the information as the official position of the Department, or in support of the official position of the Department;
    - Has authority to review and approve the information before release; or
    - Directs that the information be disseminated unless the grantee displays a clear disclaimer that "the findings and conclusions in this report are those of the author(s) and do not necessarily represent the views of the funding agency;"
- Applied research conducted by the Institute of Education Sciences' Regional Educational Laboratories (RELs) on behalf of a REL partner (*e.g.*, state education agency, local education agency, institution of higher education) that: (1) relies upon data provided by the partner and (2) which bears the disclaimer that resulting publications' content "does not necessarily reflect the views or policies of the Institute of Education Sciences or the U.S. Department of Education;"
- Opinions that are clearly identified as such, and that do not represent facts or the agency's views;
- Electronic links to information on other web sites;
- Correspondence with individuals;
- Responses to requests for information under the Freedom of Information Act, the Federal Advisory Committee Act, the Privacy Act, oversight requests, and applicable litigation rules;
- Press releases, unless they contain new substantive information that was not previously released;
- Congressional testimony that includes information that has previously been disseminated;
- Comments received from the public in response to *Federal Register* notices;
- Distributions intended to be limited to subpoenas or adjudicative processes, *i.e.*, the findings and determinations made in the course of adjudications; and
- Archival records, including previously released information products that are not being relied upon, used for decision-making, or held out as authoritative information.