

# **Data Quality Act/ Information Quality Guidelines**

## **Quality Management Training Module**

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# Location to Retrieve Handouts

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<http://epa.gov/greatlakes/qmp/qmtraining.html>



# Course Goals



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At the completion of this course, you will:

- Understand **what** the Data Quality Act is and how EPA's Information Quality Guidelines relate to it
- Understand how EPA's Information Quality Guidelines are **implemented**
- Be familiar with the **basic tools** to assist staff with the implementation the Information Quality Guidelines



# Course Outline



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## 1. What is the DQA/IQG (20 minutes)

- Break for questions (5 minutes)

## 2. Implementation of IQGs (20 minutes)

- Break for questions (5 minutes)

## 3. IQG tools (20 minutes)

## 4. Summary (10 minutes)

## 5. Discussion (30 minutes)



# Data Quality Act

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- Applies to dissemination of information by Federal agencies
- Requires government-wide standards for “ensuring and maximizing the **quality, objectivity, utility, and integrity** of information (including statistical information) disseminated by Federal agencies”
- Office of Management and Budget (OMB) has oversight role
- Reference
  - Section 515 (a) of the U.S. Treasury and General Government Appropriations Act for FY 2001 (Public Law 106–554; H.R. 5658)



# OMB Oversight Role

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- Developed guidance for implementing the Data Quality Act
  - Applies to all Federal agencies subject to Paperwork Reduction Act
  - Covers all “disseminated” information
- Reference
  - 67 FR8452; February 22, 2002



# Scope of OMB Guidelines

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- Define
  - “information” products
  - “dissemination”
  - “influential” scientific or statistical information
- Require Agencies to:
  - Establish pre-dissemination procedures for information products
  - Develop administrative mechanisms for responding to requests for correction (RFCs)
  - Report to OMB annually on status of implementation



# Information Quality

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OMB's Guidelines define "quality" as:

- Objectivity of Information
  - Accurate
  - Reliable
  - Unbiased
- Utility of Information
  - Usefulness of information
- Integrity of Information
  - Security from unauthorized access or changes to the information



# EPA's Implementation of the DQA/IQGs

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- EPA issued *The Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by the Environmental Protection Agency*
  - EPA/260R-02-008; October 2002,  
[www.epa.gov/quality/informationguidelines/documents/EPA\\_InfoQualityGuidelines.pdf](http://www.epa.gov/quality/informationguidelines/documents/EPA_InfoQualityGuidelines.pdf)
- These “EPA IQGs” articulate EPA’s position on use of quality data in making decisions and underscore EPA’s commitment to disseminating information that is accurate and useful to the intended user



# Types of Information

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- **Influential information**
  - Reproducible: Sufficient information to allow qualified third-parties to reproduce EPA's analyses
  - Examples: OMB economically significant actions, peer reviewed documents, top Agency policy documents, risk assessments, studies, guidance
- **Influential Risk Assessment information**
  - Objective: Apply adaptation of the quality principles found in the Safe Drinking Water Act Amendments of 1996
- **Non-influential information**
  - Transparent: Public can understand how EPA obtained and reached conclusions on disseminated information



# What do the EPA IQGs cover?

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- Distribution of information prepared by EPA
  - Represents Agency's viewpoint
  - Supports regulation, guidance, etc.
- EPA distributes data from outside party
  - EPA endorses or agrees with the information
- Agency-sponsored distributions (directs an outside party to distribute)
- Processes for responding to Requests for Correction (RFC) and Requests for Reconsideration (RFR)



# Information Subject to EPA IQGs

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1. Information produced by EPA to:
  - support or represent EPA's viewpoint
  - formulate or support a regulation, guidance, or other Agency decision or position



# Information Subject to EPA IQGs (continued)

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2. Information from an external provider IF the Agency uses it
  - In a manner that reasonably suggests EPA endorses or agrees with it
  - To support or represent EPA's viewpoint
3. Information from external provider IF EPA directs the outside party to disseminate the information on EPA's behalf



# What *don't* the Guidelines cover?

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- Distribution of information for government employees
- EPA responses to FOIA, FACA, etc.
- Correspondence directed to individuals or persons
- Ephemeral information (press releases, press conferences)
- Information solely presented to Congress



# What *don't* the Guidelines cover? (continued)

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- Background information (published articles distributed by libraries, or other non-EPA endorsed distributions)
- Information distributed by grantees, under contracts, coop agreements, *unless* EPA adopts or endorses information
- Information in public filings (unless OW uses in subsequent analysis)
- Distribution of information in judicial case or administrative adjudication



# Examples – Do the Guidelines cover the item or not?

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- Government provides the 2011 holiday schedule for employees – covered or not covered? **NOT COVERED**
- Government contractor produces a final report for the EPA that is listed on an EPA Web site – covered or not covered? **COVERED**
- EPA releases a new guidance document – covered or not covered? **COVERED**
- Grantee publishes an article on their own method development – covered or not covered? **NOT COVERED**



# Questions & Discussion

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- In class, please use a microphone
- On webinar, please type your question



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# How is the IQG Program Implemented?

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- Office of Environmental Information (OEI) has lead implementation responsibility
- Quality Staff executes the day-to-day activities
- Programs and Regions as information owners are responsible for responding to Requests for Correction (RFC) in consultation with OEI
- IQG Officers and Contacts facilitate the process
- Executive Panel consisting of Assistant Administrators, Regional Administrators, the Science and Economic Advisors consider appeals, or Request for Reconsideration (RFR)
- OMB Oversight



# Compliance with Information Quality Guidelines

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- Adhere to QA policies and processes
- Use IQG pre-dissemination checklist and manager review
- Respond to Requests for Corrections



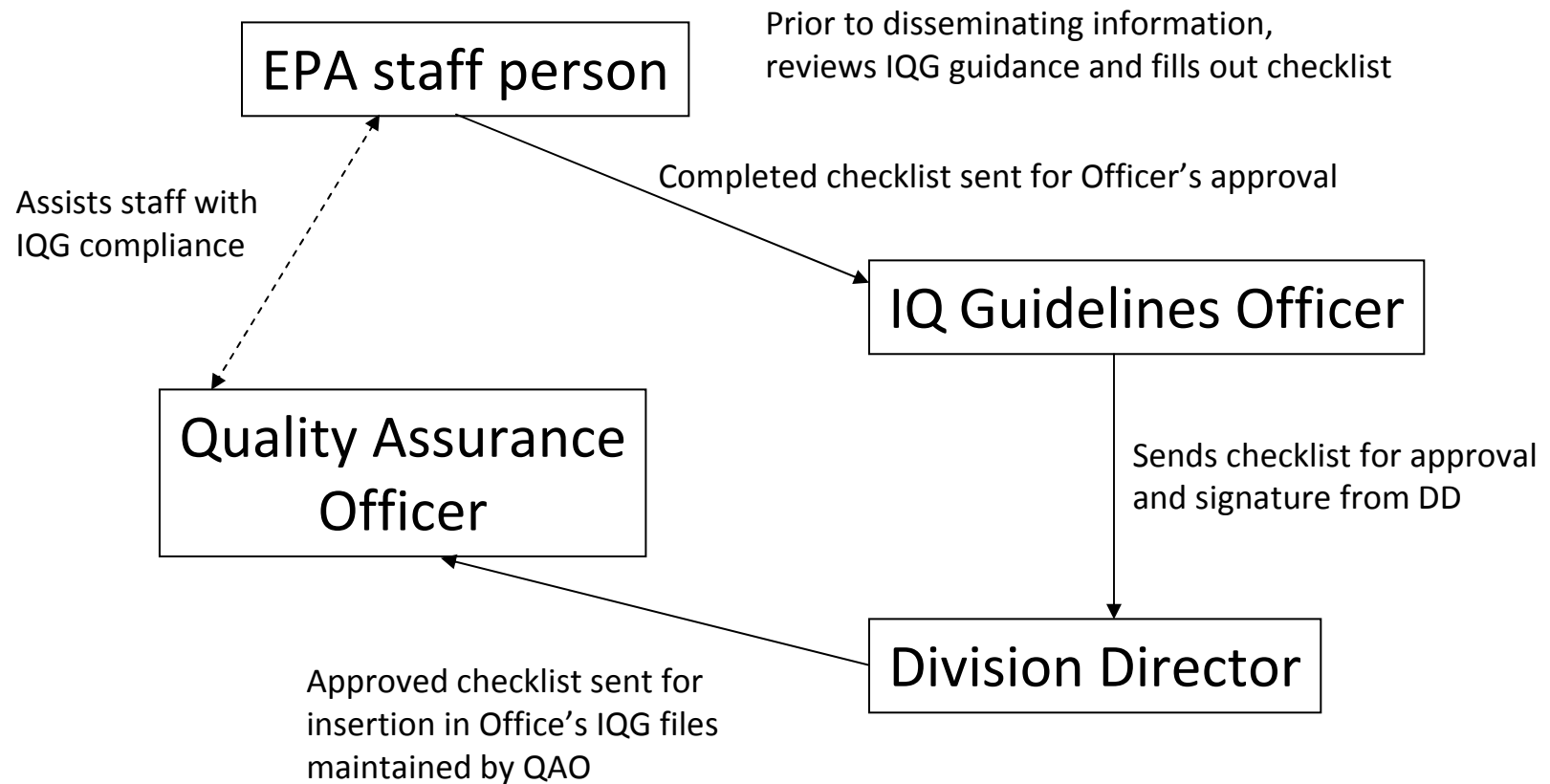
# Pre-dissemination Review

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- Mandatory for any information disseminated that falls under IQ Guidelines
- IQG checklist to be used by staff, prior to dissemination
- Information Quality Guidelines Officer and Division Director must sign completed checklist to ensure compliance and send copy to Quality Assurance Officer



# OW - Pre-Dissemination Review Process



# Administrative Mechanisms for Responding to DQA Petitions

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- The IQGs provide the public with a vehicle outside the Administrative Procedures Act to challenge EPA's information
- **Request for Correction** – Initial request for correction
- **Request for Reconsideration** – Appeal to reconsider the response to the RFC
- Since implementation, EPA has received a wide range of requests from private citizens, corporations, industry, non-governmental organizations, Congress, and Chamber of Commerce



# Responding to Users of EPA's Disseminated Information

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- Encourage to contact information provider first
- Requests for Correction
- Requests for Reconsideration
  - Iterative response process
  - Requires OMB review of responses
- Goal: 90-day response time



# Exceptions to Request For Corrections Process

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- If public has previously had an opportunity to comment on information, then EPA may choose to reject a request for correction
  - Example: Information used in rulemaking after public notice and comment period has ended



# Request for Reconsideration Process

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- If decision appealed, executive panel will make decision
  - Panel consists of EPA Chief Information Officer, EPA Science Advisor, EPA Economics Advisor
- IQ Guidelines Officer will contact all affected managers and staff to convene a meeting to address appeal
- Work with panel to assist decision



# Example

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## Jefferson County Commission

[RFC 06002](#) (PDF 271KB) **Subject:** 2002 EPA report on biological and water quality studies of the Cahaba River

- Letter dated 10/26/2005; received 11/03/2005
- Notification of receipt sent to requestor on 11/03/2005
- [EPA Interim Response to RFC](#) (PDF 15KB); issued 01/31/2006
- [EPA Interim Response to RFC](#) (PDF 64KB); issued 05/03/2006
- [EPA Interim Response to RFC](#) (PDF 62KB); issued 08/02/2006
- [EPA Related Correspondence](#) (PDF 111KB); 07/25/2006
- [EPA Response to RFC](#) (PDF 421KB); issued 08/25/2006



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# Management Tools for Achieving IQG Conformance

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- Emphasize that requirements for EPA's Quality System provides for systematic planning for the right type, quantity and quality of data supporting environmental operations
- Support EPA's Peer Review Policy on the use of best available science in EPA's work products
- Promote transparency in pre-dissemination processes governing EPA's information products
- Give precedence to established Agency administrative processes
- Establish procedures for responding to information challenged under the IQGs



# IQG Implementation Tools

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- Peer Review
- Assessment Factors
- IQG Forms
- GLNPO Web Product Review Form
- Disclaimers



# Peer Review

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- Process for enhancing a scientific or technical work product so that the decision or position taken by the Agency, based on that product, has a sound, credible basis
- MUST be performed for highly influential scientific assessments and influential scientific information
  - Process must be transparent
- MAY be performed on scientific information that does not meet the criteria for influential scientific information

EPA Science Policy Council Peer Review Handbook (EPA 100-B-06-002),  
[http://www.epa.gov/peerreview/pdfs/peer\\_review\\_handbook\\_2006.pdf](http://www.epa.gov/peerreview/pdfs/peer_review_handbook_2006.pdf)



# Assessment Factors

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- Prepared by the Science Policy Council in 2003 to
  - Complement the IQGs
  - Inform information-generating scientists about quality issues that should appropriately be taken into consideration at the time information is generated
  - Serve as an additional resource for Agency staff as they evaluate the quality and relevance of information, regardless of source

**Reference:** *Assessment Factors - A Summary of General Assessment Factors for Evaluating the Quality of Scientific and Technical Information*

**Document:** <http://www.epa.gov/spc/pdfs/assess2.pdf>

**General info:** <http://www.epa.gov/OSA/spc/assess.htm>



Example

## GLNPO Information Quality Products Approval

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1.) Title of Product: \_\_\_\_\_

2.) Description/ Abstract : \_\_\_\_\_

3.) Product Type \_\_\_\_\_

4.) Branch Chief Approval on Conformance to IQG

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

5.) GLNPO Office Director Approval on Conformance to IQG

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

6.) Received by IQG Tracking Contact

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



# Handout

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Please look at IQG checklists  
developed and used by OW



# GLNPO Web Product Review Form

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- This Web product review form will be used:
  - to assess whether IQGs are met for products listed on GLNPO Web sites
  - to meet compliance with IQG in absence of pre-dissemination review form for products listed on GLNPO Web sites
  - to assess if products listed on GLNPO Web sites are current and latest version



# Disclaimers

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- Publications should include a disclaimer as to whether the document has undergone EPA review and whether it reflects the policies or views of EPA. Here is an example:

*“Any opinions expressed in this publication are those of the author(s) and do not, necessarily, reflect the official positions and policies of the U.S. EPA. Any mention of products or trade names does not constitute recommendation for use by the U.S. EPA.”*



# Summary of Responsibilities

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- **Staff**

- Follow Agency QA procedures
- Develop information products with IQ Guidelines in mind
- Complete IQG checklists, prior to dissemination
- Assist in responses to RFCs
- Provide documentation to IQG Officer

- **Quality Assurance Officers**

- Assist Office with IQG compliance
- Maintain IQG file for Office



# Summary of Responsibilities (continued)

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- **Branch Chiefs**
  - Assist in responses to RFCs
- **Division Directors**
  - Approve IQG checklists
- **Office Directors**
  - Approve RFCs and send disapprovals to AA
- **Assistant Administrator**
  - Disapprove RFCs
  - Respond to Request for Reconsiderations (assist EPA panel)



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# Summary - IQGs

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- The IQGs are a positive addition to EPA's Quality Program
- They reinforce the Agency's commitment to quality data and information
- They are a component of EPA's Quality System for information product development
- IQGs are highly visible with scrutiny by Congress, the media, our partners, and the public



# Conclusion

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“A true functional value-added quality system is not driven by approved documentation, but more so, by the activities implemented on a daily basis that enhance the quality of the environmental decision.”

Great Lakes National Program Office's QMP:  
<http://www.epa.gov/glnpo/qmp/index.html>





# Soaring Towards Quality

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Please send all comments and questions to:

- Louis Blume, 312-353-2317;  
[Blume.Louis@epa.gov](mailto:Blume.Louis@epa.gov)
- Marion Kelly, 202-566-1045;  
[Kelly.Marion@epa.gov](mailto:Kelly.Marion@epa.gov)



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# CONGRATULATIONS!

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You have successfully completed the

## Data Quality Act/Information Quality Guidelines Quality Management Training Module

If you would like to know more about the EPA Information Quality Guidelines or have any questions, please contact:

- Quality Assurance Manager, or Quality System Coordinator  
<http://www.epa.gov/quality/contacts.html>
- Quality staff: [quality@epa.gov](mailto:quality@epa.gov) or 202-564-6830
- Visit the EPA QA Web site at:  
<http://www.epa.gov/quality>



# Certificate of Completion

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Webinar participants should contact Marion Kelly at [Kelly.Marion@epa.gov](mailto:Kelly.Marion@epa.gov) to receive a Certificate of Completion and provide the following information:

- First and last name
- Affiliation
- Code word



# Questions & Discussion

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