

## ENSURING QUALITY OF INFORMATION DISSEMINATED BY THE DEPARTMENT OF VETERANS AFFAIRS (VA)

1. **REASON FOR ISSUE:** This handbook establishes new Department of Veterans Affairs (VA) procedures for ensuring the quality of information (i.e., information validity, reliability, usefulness and objectivity) before it is disseminated to the public. The handbook implements policies contained in VA Directive 0009, "Ensuring Quality of Information Disseminated by VA" and VA's Office of Management and Budget (OMB) guidelines for ensuring information quality.
2. **SUMMARY OF CONTENTS/MAJOR CHANGES:**
  - a. This handbook introduces procedures and standards for reviewing and substantiating publicly disseminated information to ensure that it meets basic quality standards established by OMB and VA and for tracking and processing complaints from affected persons seeking to obtain, where appropriate, corrections to information that does not meet the established quality standards. It also establishes the necessity for compliance with the following two authorities: (1) VA Directive 0009, Ensuring Quality of Information Disseminated by VA and (2) Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by VA.
  - b. It identifies responsibilities for the Administration and Staff Offices Department's Influential Information Quality Officer (IIQO) also called Information Quality Officers, as well as responsibilities for IIQOs in the Administrations and Staff Offices and Chief Data Officer (CDO).
  - c. It contains peer review, publication and quality standards designed to be flexible enough to fit all disseminated information in printed, electronic or other forms of media.
3. **RESPONSIBLE OFFICES:** Office of Enterprise Integration (OEI) (008) is the lead responsible office with support from the Office of Management (OM) (004).
4. **RELATED DIRECTIVE:** VA Directive 0009, Ensuring Quality of Information Disseminated, dated June 3, 2019.
5. **RESCISSION:** Not applicable.

Department of Veterans Affairs  
Washington, DC 20420

VA HANDBOOK 0009  
Transmittal Sheet  
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**CERTIFIED BY:**

**BY DIRECTION OF THE SECRETARY  
OF VETERANS AFFAIRS:**

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**DISTRIBUTION:** Electronic only

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## ENSURING QUALITY OF INFORMATION DISSEMINATED BY VA

### 1. PURPOSE.

- a. This handbook provides Department-wide policy for ensuring the quality of information VA disseminates to the public. Section 515(b) of the Information Quality Act codified at 44 U.S.C. § 3516 required Federal agencies to issue their own implementing guidelines, including an administrative procedure to allow affected persons to seek and obtain correction of information that does not comply with the guidelines.
- b. This handbook contains mandatory VA procedures and responsibilities for holders of influential information to include:
  - (1) Peer review or approved alternative requirements for substantiating and managing information created, collected and disseminated to the public;
  - (2) Processing requests for correction of disseminated information that does not meet the established VA standards; and
  - (3) Complying with OMB reporting requirements.
- c. The handbook supplements policies and responsibilities prescribed in VA Directive 0009, Ensuring Quality of Information Disseminated by VA and requirements outlined in VA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by VA and other Federal agencies. Collectively, the handbook, directive and guideline documents outline the tools necessary for ensuring that information disseminated by the VA is objective, unbiased and accurate in both presentation and substance.
- d. Since VA Administrations and Staff Offices disseminate a wide variety of influential information, the standards contained herein cannot be implemented in the same manner consistently by every organization. The handbook standards are designed to be generic enough to cover all disseminated influential information in printed, electronic or other forms of media. The idea of allowing flexibility is that it will allow each organization to have the opportunity to adapt the standards to their existing information resource management and administrative practices while ensuring that product evaluations abide by the same considerations of technical and reproducibility aspects as to the Veteran or stakeholder point of view.
- e. The information included in this handbook covers existing products and new products, however, it is important that when evaluating work products, the same consideration is given to the technical and the reproducibility aspects as to the context from the Veteran or stakeholder point of view.

- f. Administrations and Staff Offices are encouraged to inform other applicable Administrations and Staff Offices throughout VA having substantial interest or expertise in the material proposed to be disseminated.

**2. SCOPE.** This Handbook applies to all information published after 2002, including any information submitted or developed by a third party disseminated by the Department must comply with basic standards of quality to ensure and maximize its integrity, objectivity, utility, reproducibility and transparency as defined in the definitions Section of Directive 009, Ensuring the Quality of Information Disseminated by VA. The policies in this Handbook do not apply to VHA research activities or publications.

### **3. RESPONSIBILITIES.**

a. **Assistant Secretary for Office of Enterprise Integration (OEI)** shall:

- (1) Issue a request to Assistant Secretaries and Undersecretaries for the designation of a primary and alternate Influential Information Officer from each Administration and Staff Office for data, analysis and synthetic work;
- (2) Establish Department-wide policies and procedures to ensure the quality of Influential Information including data, analysis and synthetic work for those that are non-financial in nature;
- (3) Establish and maintain an administrative mechanism for tracking and responding to information corrections and appeals;  
  
Designate VA's liaison officer with OMB and other Federal agencies regarding management and operations of the Influential Information quality program; and
- (4) Establish procedures and reporting requirements for monitoring non-financial information quality complaints and preparing recurring or ad hoc reports.

b. **Chief Data Officer (CDO), Office of Enterprise Integration (OEI)** shall:

- (1) Establish Department-wide policies and procedures to ensure the quality of influential information (except financial information) disseminated by VA;
- (2) Issue changes to policies and procedures as necessary to implement and manage the influential information quality program;
- (3) Provide advice, assistance and recommendations to the Assistant Secretary for Information and Technology regarding policies, procedures and other requirements governing the data management and analysis quality program and its operation;

- (4) Serve as the Department's liaison officer with OMB and other Federal departments and agencies concerning activities related to management and operation of the influential information quality program;
  - (5) Develop and maintain a mechanism to receive, process and track requests for correction of disseminated information and responses; and
  - (6) Provide a semi-annual fiscal year report to OMB containing quantitative and qualitative information, where appropriate, on the number, nature and resolution of complaints received by the Department.
  - (7) Coordinate the information quality program guidance with VA's Chief Science Officer.
- c. **Assistant Secretary for Management and Chief Financial Officer** shall:
- (1) Establish Department-wide policies and procedures to ensure the quality of financial influential information disseminated by VA;
  - (2) Issue changes to policies and procedures as necessary to implement and manage the Financial influential information quality program;
  - (3) Serve as the Department's liaison officer with OMB and other Federal departments and agencies concerning activities related to the management and operation of the financial influential information quality program;
  - (4) Develop and maintain a mechanism to receive, process and track requests for the correction of disseminated information and responses;
  - (5) Provide annual fiscal year reports to OMB and other federal agencies containing quantitative and qualitative information, where applicable.
- d. **Under Secretaries, Assistant Secretaries and Other Key Officials** shall:
- (1) Distribute VA Directive 0009, Ensuring Quality of Information Disseminated by VA, this handbook and Guidelines for Ensuring the Quality, Objectivity, Utility and Integrity of Information Disseminated by VA within the Administrations and Staff Offices;
  - (2) Designate a primary and an alternate Influential Information Quality Officer (IIQO) in their areas of responsibility to assist in managing the program.
  - (3) Establish the peer review program for their administration/staff office.
- e. **Administration and Staff Office Influential Information Quality Officers (IIQO)** shall:

- (1) Represent Administration and Staff Office heads on matters relating to the program to ensure influential information quality;
- (2) Coordinate and track influential and highly influential products, requests for corrections and appeals within their respective areas of responsibility and as applicable, coordinate reviews and track products requiring review from the organization's Scientific Integrity Officials; and
- (3) Report the status of the products to Data Governance and Analytics (DGA) (CDO Office) and provide timely support for the completion of the semi annual and annual fiscal year reports to OMB regarding the number, nature and resolution of complaints received regarding perceived or confirmed failure to comply with VA standards.

**Note:** The organization may appoint different POCs for the Financial Information and all other Highly Influential Information; however, these POCs may need to coordinate the requirements submissions.

- (4) Ensure that disseminated information is objective, unbiased and accurate in both presentation and substance by establishing or incorporating into existing information resource management, processes for reviewing and substantiating the quality of influential information in accordance with the following:
  - (a) Internal controls to ensure information objectivity;
  - (b) Internal controls to ensure information utility;
  - (c) Data quality based on VA's Data Management and Data Governance requirements as set forth in Directive 0900, VA data Management and its associated Handbooks;
  - (d) Measure the quality of information by its objectivity. Objectivity focuses on whether the disseminated information is being presented in an accurate, clear, complete and unbiased manner. This includes presenting the information in the proper context and disseminating other information, as necessary, to ensure an accurate, clear, complete and unbiased presentation. Also, VA elements should, to the extent possible and consistent with security, privacy, intellectual property, trade secrets and confidentiality protections, identify the sources of disseminated information. In the scientific, financial or statistical context, where possible, make accessible supporting data and models so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Data and information products should have full, accurate, transparent documentation and possible sources of error affecting data quality should be identified and disclosed to users;

- (e) Measure the clarity of the information by reviewing VA's information products before release to ensure clarity and coherence of the material presented. VA's information will include, to the extent feasible, the proper background to ensure the completeness of the material presented;
  - (f) Measure the quality of information by its utility. Utility refers to the usefulness of the data to intended users. "Useful" means that the content of the information is helpful, beneficial or serviceable to its intended users or that the information supports the usefulness of other disseminated information by making it more accessible or easier to read, see, understand, obtain or use. In addition, when reviewing the utility of its information organizations shall provide the information on data collection, data universe, context and include a copy or the details of the survey form. As a result, when transparency of information is relevant for assessing the information's usefulness from the public's perspective, VA organizations should take care to ensure that transparency has been addressed in its review of the information;
  - (g) It is important that all products are assessed based on the audience they are intended to address. VA's information dissemination process will make information products widely available and broadly accessible. VA will ensure that its information products are accessible to all potential users, including individuals with disabilities, per Federal law, statute and VA guidance;
  - (h) Integrity. VA will utilize appropriate security controls and mechanisms to protect its proprietary, pre-decisional and otherwise sensitive information from improper dissemination. When information integrity has been compromised and/or the occurrence of an incident is suspected, the IIQO, the Information System Security Officer, the IIQO and Information Security Officer will be notified and will provide guidance on the immediate steps that should be taken to remedy the situation and the facilitate correction of the compromised information; and
  - (i) Measure the quality of data by its compliance with VA's Data Management and Data Governance requirements to include security, which is the protection of information from unauthorized access or revision. VA organizations should ensure that information is not compromised through corruption or falsification.
- h. **Contracting Officers** shall: ensure all contracts include the necessary language to address all the requirements listed in the Handbook.

#### 4. CHARACTERISTICS OF INFLUENTIAL INFORMATION.

- a. As a general rule, influential information is determined based on the impact a specific piece of information or body of information will have on the public. The definition applies to the “information” itself, not to decisions that the information may support. To determine if the information is influential, the person reviewing it must be convinced that the criterion below has a high probability or certainty of occurring. Please note that even if a decision or action by itself is very important, a particular piece of information supporting it may or may not be “influential;”
- b. Influential information is determined when it can be reasonably discerned that dissemination of information will or does have, a clear and substantial impact on important public policies or important private sector decisions and it informs administrative, programmatic decisions and/or service delivery. Even when the information has a clear and substantial impact, it is not considered influential if the impact is not on a public or private decision that is important to policy, economics or other decisions;
- c. In non-rulemaking contexts, VA will consider two factors – breadth and intensity – in determining whether scientific information is influential. Every decision VA makes based on disseminated information may be important to someone. That does not mean that disseminated scientific information used for each decision is influential, as the term is used in these guidelines. In determining whether scientific information is influential, it should be considered whether the information affects a broad range of parties. VA Administrations and Staff Offices may designate certain classes of scientific information as “influential” or not in the context of their specific programs. Absent such designations, the determination of influential will be made on a case-by-case basis, using the principles articulated in these guideline.

**Note:** Rulemaking requirements are not covered by this Handbook.

- d. If the information has a significant impact on the VA’s public policy or legislative matters relative to the delivery of Veterans’ benefits or health care services, it is considered highly influential. VA’s highly influential information includes the following categories:
  - (1) Raw data and/or statistical information derived from original data collections; administrative records; compilations of data from primary sources such as forecasts and estimates derived from statistical models, expert analyses, performance and operational data, data collections that support accountability and oversight analysis and analysis and interpretations of statistical information including metadata;
  - (2) Literature reviews, evidence-based synthesis and meta-analysis using published literature (that are not submitted to external scientific journals for peer review already); and

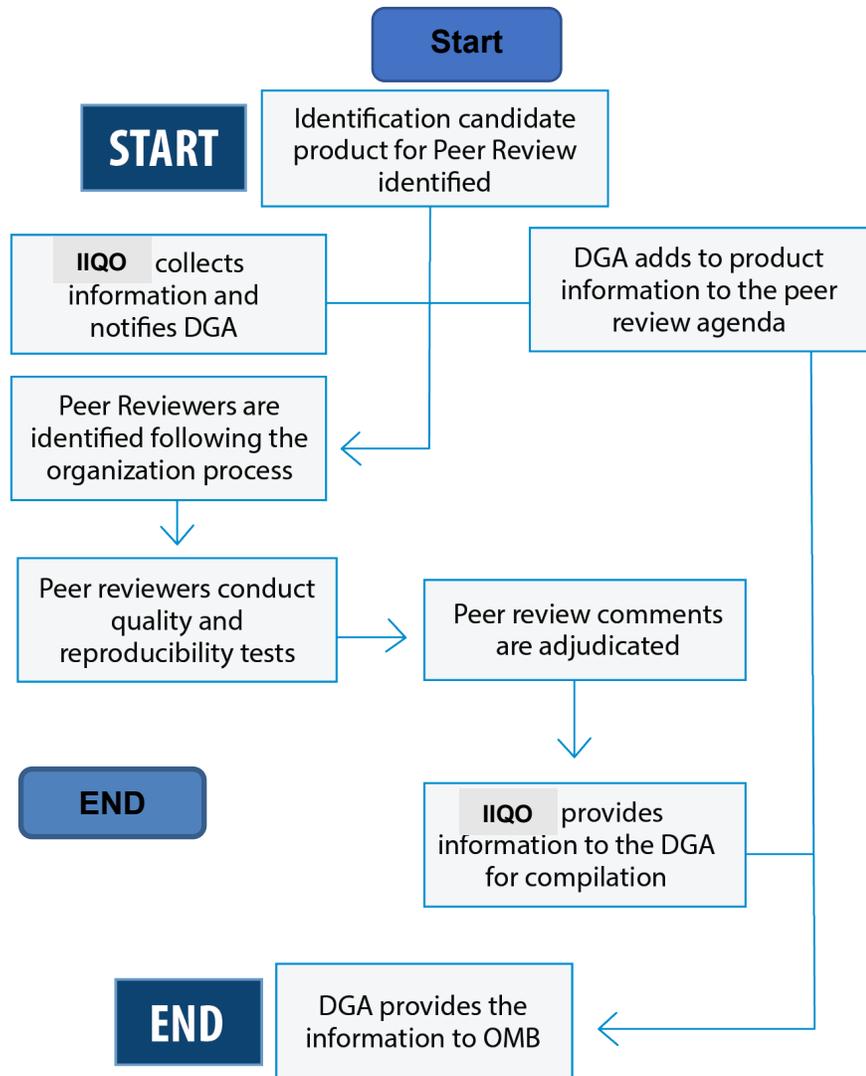
- (3) Scientific information, including behavioral and social sciences and excluding human subjects (medical) research, where the method of research is one in which a hypothesis, formulated after systematic, objective collection of data, is tested empirically (relying on experiment and observation rather than theory). Scientific information that affects a broad, rather than a narrow, range of parties (e.g., an entire industry or a significant part of an industry, as opposed to a single company) is more likely to be influential. Scientific information that has a low cost or modest impact on affected parties is less likely to be influential than scientific information that can have a very costly or crucial impact. Information that has an intense impact on a broad range of parties should be regarded as influential. The standards and requirements for scientific information will be provided in a Scientific Information Directive and Handbook issued by VA's Chief Science Officer.
- e. In policy and decision-making, influential is information that will have a clear and substantial impact on the resolution of one or more key issues in an economically significant rulemaking, as that term is defined in Executive Order 12866. Executive Order 12866 defines an economically significant rulemaking as one that is likely to result in a rule that may have an annual effect on the economy of \$100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety or State, local or tribal governments or communities. The reference to key issues on significant rules reflects the "important" public policy language of the guidelines. Highly influential information is information that has a potential impact of more than \$500 million in any one year.
  - f. As permitted by privacy laws, all influential information relevant to the evaluation of programs that deliver health care, benefits and services to Veterans shall be disaggregated by time, location, gender, race and ethnicity when the data lends itself to such disaggregation. Race and ethnicity information shall be collected, reported and/or analyzed consistent with [OMB's Standards for the Classification of Federal Data on Race and Ethnicity](#). Other demographic and socio-economic characteristics shall be included as deemed appropriate. This guidance applies to the use of original data collected by Administration/Staff Offices or by integration of authoritative data from elsewhere within the VA. The data and associated analyses shall be made available to the public except for such cases in which disaggregation would undermine the anonymity of a Veteran.

## 5. PEER REVIEW PROCESS AND STANDARDS.

- a. The peer review process is to review preliminary (or draft) work products for objectivity, utility and reproducibility using independent experts to uncover technical problems, unresolved issues or interpretation problems. Peer review can be defined as a process for enhancing highly influential information products by the use of independent experts so that the decision or position taken by the

VA, based on that product, has a sound, credible basis and the limitations are made transparent.

- b. To be most effective, peer review of highly influential information products should be incorporated into the up-front planning of the creation of the work product – this includes obtaining the proper resource commitments (people and money) and establishing realistic schedules.
- c. The peer review process is as follows:



- d. Once it is determined that a work product requires a peer review, the CDO needs to be notified via the Influential Information and Feedback Tracking Tool | (va.gov) to ensure this request is added to the semi-annual report to OMB for the Department’s peer review agenda.

- e. VA will use many types of peer reviews. Transparency is important for peer review and at minimum, each organization should implement standards for the transparency of VA-sponsored peer review. Per OMB Memorandum M-05-inal Information Quality Bulletin for Peer Review (December 16, 2004), a list of all reviewers' names will be made public. All reviewers' comments and their adjudication must be available for public dissemination when requested by a stakeholder; comments may be anonymized. The process for requesting information should be added to the webpage where the analysis is published along with all the other report publication requirements.
- f. Independent external peer reviews are accepted and the information may generally be presumed to be of acceptable objectivity. However, the names of the reviewers and the response to the comments need to be available to the public.
- g. The intensity of peer reviews will be commensurate with the significance of the risk or its management. Peer reviewers selected by VA must be selected primarily on the basis of technical expertise, be expected to disclose to VA prior technical/policy positions they may have taken on the issues at hand, be expected to disclose to VA their sources of personal and institutional funding (private or public sector) and conduct their reviews in an open and rigorous manner.
- h. Peer review standards will be interpreted in a manner appropriate to assure the timely flow of vital information from the VA to medical providers, patients, health agencies and the public. VA may temporarily waive information quality standards in urgent situations (e.g., imminent threats to public health or homeland security).
- i. When analyses of risks to human health, safety and the environment are disseminated, if at all, the quality principles applied by Congress to risk information used and disseminated pursuant to the Safe Drinking Water Act Amendments of 1996 (42 U.S.C. § 300g-1(b)(3)(A) & (B)) will be applied to the extent feasible.
- j. Peer reviewers need to ensure that the requirements of the Privacy Act, the Health Information Portability Act (HIPAA) Privacy Rule and other applicable confidentiality provisions are integrated into the review of all VA data before a decision to authorize the release of data.

## **6. THIRD PARTY REQUIREMENTS.**

- a. Each applicable contract, especially those that may result in highly influential information, should include Third Party Dissemination Standards that mirror these guidelines.

- b. If VA disseminates information prepared by an outside party in a manner that reasonably suggests that VA agrees with the information, the appearance of having the information represent VA's views makes the information subject to the information quality standards.
- c. By contrast, VA standards will not apply in the case when VA does not "initiate" the dissemination of information, such as when the VA hires a consultant or a non-VA researcher conducts a study for journal publication in which they can publish and communicate their research findings in the same manner as their academic colleagues or as required by their organization. In this case, the VA standards will not apply unless VA has specifically requested to do so. This applies even though VA has funded the research and may retain ownership or other intellectual property rights.
- d. To avoid confusion regarding whether the Department is sponsoring the dissemination, the researcher should include an appropriate disclaimer in the publication or presentation to the effect that the "The views expressed reflect those of the authors and are not necessarily those of the Department of Veterans Affairs or the U.S. Government." As a rule of thumb, products with a VA seal are considered official products. This disclaimer rule applies to semi-official products such as conference papers, presentations, journal articles, etc., made by third-party and VA researchers. On the other hand, subsequent VA dissemination of such information requires that the information adheres to VA's information quality standards.

## **7. REPRODUCIBILITY STANDARDS.**

- a. Reproducibility means that the publication has all the information necessary to ensure that third parties can reach the same results using the same data and/or information.
- b. The disclosures accompanying the report should allow any qualified person to conduct an independent re-analysis, if necessary, which should produce substantially the same results as the original research.
- c. Reproducibility standards will be applied to original and supporting data. When original and supporting data must be generated and analytical results developed, a consistent reproducibility standard to transparency for how analytical results are generated will be applied. For example, specific data used, assumptions employed, specific analytical methods used and statistical procedures employed, will be documented. These methods will allow any qualified person to conduct an independent re-analysis, if necessary, which should produce substantially the same results as the original research. Organizations will be flexible in determining what constitutes original and supporting data.

- d. The analytical results developed should be disclosed to ensure transparency how analytical results are generated. The minimum requirements include:
  - (1) Complete a Key Analytical Question form;
  - (2) Date when the data were retrieved/received for analysis;
  - (3) Sources of the data (use of Authoritative Data Sources in VA Enterprise Repository);
  - (4) Specific data and variables used;
  - (5) Data and universe definitions;
  - (6) Internal controls to measure quality of the data;
  - (7) Assumptions employed;
  - (8) Study design and specific analytical methods used;
  - (9) Analytical tools and statistical procedures employed, including robustness checks; and
  - (10) Measure of variance, when appropriate.
- e. In cases where reproducibility may not occur due to other compelling interests (i.e., ethical, feasibility or confidentiality constraints) organizations will: (1) perform robustness checks appropriate to the importance of the information involved (e.g., determining whether a specific statistic is sensitive to the choice of analytical method and the accompanying information disseminated); (2) address the degree that reproducibility will be limited by the confidentiality of underlying data; (3) annotate all the calculations and methods used. Organizations will address ethical, feasibility and confidentiality issues with care. Reproducibility of data is limited by the requirement that VA complies with federal confidentiality statutes, such as the Privacy Act, 5 U.S.C. § 552a and 38 U.S.C. § 5701, 5705 and 7332.

## **8. ADMINISTRATIVE CORRECTION/APPEAL PROCEDURES.**

- a. An administrative process is available to allow affected persons to seek and obtain, where appropriate, the timely correction of information that does not meet the established standards. The correction and appeal process are available for genuine and valid requests for the correction of information and the person filing the request has the burden of proof with respect to the necessity for correction as well as the type of correction requested.
- b. Information Correction Process.

- (1) If an affected person believes that disseminated influential information is not accurate, clear, complete or unbiased, he or she can submit a request for correction via the link that appears at the bottom of the VA's homepage. Requests for correction of information can also be submitted via written correspondence to the address provided in the publication requiring updates. Requests must include the requestor's name, phone number, the preferred mechanism for receiving a written response from VA (fax, e-mail, regular mail) with applicable contact information and organizational affiliation (if any). The request for correction should clearly describe the information that the requestor believes needs correcting and include the name of the report or information source, the location if electronic and the date of issuance. It is important that the requestor includes a justification that specifically states what information should be corrected and what changes to the information, if any, are proposed. If possible, the requester should provide supporting evidence to document the request/claim;
- (2) Requests for correction of influential information will be routed to the appropriate VA Administration or Staff Office for review via the correspondence system. VA will respond to all requests for corrections within 60 calendar days of receipt. If the VA office receiving the request determines that it does not adequately and reasonably describe the disseminated information source, the correspondent will be advised that additional information is needed. If the correspondent does not respond within 60 calendar days, the complaint will be dismissed (See 8b (4)) below for other reasons for dismissing a complaint). If the challenged information is determined to be correct or valid, the correspondent will be provided with a statement as to why the request for correction is not acted upon and how to file an appeal;
- (3) Corrective actions will vary. Possibilities include correction or replacement of information on the VA website, revision of subsequent issues of recurring products and issuance of errata for printed reports and other data products.
- (4) Reasons for dismissing a request for correction. Some of the most frequent reasons for dismissing an information correction request include:
  - (a) Information at issue was not publicly disseminated by VA.
  - (b) Information at issue was disseminated by VA but was not authored by VA and not adopted as representing VA's views.
  - (c) Information at issue is not covered by the information quality standards.
  - (d) Complaint is identical to earlier complaint by same complainant but not submitted as an appeal.

- (e) Complaint is moot because requested correction has been made.
  - (f) Complaint is frivolous (made in bad faith, without justification, inconsequential and for which a response would be duplicative of existing processes, unnecessary or unduly burdensome on VA).
  - (g) Information at issue is obsolete.
- (5) OMB's approval of correction request response. Per OMB's Memorandum M-19-15, Improving Implementation of the Information Quality Act guidance, all responses to information correction requests must be reviewed and approved by OMB, until OMB directs VA otherwise. All the draft stakeholder responses need to be provided to the CDO who will coordinate the approval of the draft response with OMB. The owner of the information should make themselves available to address any follow-up questions. After OMB approval, the CDO will provide authorization to respond to the requester. This step may cause a delay in the final response. In this case organizations are asked to provide the draft response as soon as possible to meet the timelines mandates herein. In cases when this is not possible, the CDO will provide a waiver of this requirement.

c. Information Appeal Process.

- (1) If affected persons who request corrections of information do not agree with VA's decision (including the corrective action, if any), they may file an appeal in writing within 60 calendar days to the office indicated in the denial correspondence. The appeal can be via email or letter and include the reason why the person is submitting an appeal. The envelope and reconsideration request both should be clearly marked "Information Correction Reconsideration Request." It is important that correspondents state why they disagree and what corrective action they seek. The appropriate VA organization will review the appeal and act upon the request for reconsideration. The correspondent will be notified whether the request was granted or denied and what corrective action, if any, VA will take on the appeal;
- (2) To ensure objectivity, the VA organization that originally disseminated the information will not have responsibility for both the initial response and any subsequent appeal;
- (3) If VA believes other agencies may have an interest in the appeal, those agencies will be consulted regarding their possible interest.
  - (a) VA Influential Information and Feedback Tracking Tool at: [Influential Information and Feedback Tracking Tool | \(va.gov\)](#).

- (b) The CDO will establish, manage and operate this tracking tool and the webpage correction tool portal. Each Administration and Staff Office needs to follow their own internal processes, but all information correction requests need to be added to the VA Information Correction tracking tool within 10 calendar days of receiving the initial request. The tool needs to be updated on a regular basis. The CDO will use the information in the tracking tool to update the Correction Request Portal webpage.