

ENSURING QUALITY OF INFORMATION DISSEMINATED BY VA

1. **REASON FOR ISSUE:** To update the current Department of Veterans Affairs (VA) Directive 6361, Ensuring Quality of Information Disseminated by VA, dated September 2, 2004, to meet the standards and reporting requirements of the Office of Management and Budget (OMB).
2. **SUMMARY OF CONTENTS/MAJOR CHANGES:** This directive sets forth policies and responsibilities for reviewing and substantiating information before it is disseminated by VA and for processing valid requests for correction of disseminated information that does not meet established standards. It also establishes VA's definition for "influential information;" rescinds mandatory compliance with VA Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by VA. In accordance with OMB Memorandum M-05-03, entitled "Issuance of OMB's 'Final Information Quality Bulletin for Peer Review' and M-15-19 "Improving Implementation of the Information Quality Act" this directive establishes the processes to comply with OMB's peer review reports and the Agency's Peer Review Agenda publication and peer review requirements. The directive was updated to reflect:
 - a. Responsibilities for implementing and managing programs to ensure that information disseminated by VA is accurate, clear, complete, unbiased, and protected from unauthorized access or revision;
 - b. Requirements for higher quality standards for "influential" financial, statistical, and scientific information;
 - c. The types of media and information products applicable to and exempt from these policies;
 - d. Requirements for administrative correction and appeal processes;
 - e. The processes for compliance with OMB reporting;
 - f. Peer review process requirements; and
 - g. Change of the functional number of this directive from 6361 to 0009.
3. **RESPONSIBLE OFFICES:** Office of Enterprise Integration (008) and Office of Management (004).
4. **RELATED HANDBOOK:** None.

5. **RESCISSIONS:** VA Directive 6361, Ensuring Quality of Information Disseminated by VA, dated September 2, 2004, VA Handbook 6361, Ensuring Quality of Information Disseminated by VA, dated September 2, 2004, and VA Directive 0005, Scientific Integrity, dated July 10, 2012.

CERTIFIED BY:

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

/s/

Melissa S. Glynn, Ph.D.
Assistant Secretary for
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1. **PURPOSE.** This directive provides Department-wide policy for ensuring the quality of information VA disseminates to the public. It implements Information Quality Act codified at 44 U.S.C. § 3516. Section 515(a) directed OMB to issue Government-wide policy and procedural guidance to Federal agencies relative to information they disseminate to the public. Section 515(b) 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. OMB's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" 67 Fed. Reg. 8452, (Feb. 22, 2002) provide additional guidance on how to comply with these requirements. The policies are also subject to all provisions of the Paperwork Reduction Act of 1995, 44 U.S.C. Chapter 35 §§ 3504(d)(1), 3506(a)(1)(B); Executive Order No. 12866, Regulatory Planning and Review, September 30, 1993; OMB Circulars A-4, Regulatory Analysis, and A-130, Managing Federal Information as a Strategic Resource; the Freedom of Information Act, 5 U.S.C. 552; the Computer Security Act of 1987, 100 P.L. 235, 101 Stat. 1724; and VA Directive 6102, Internet/Intranet Services.
2. **POLICY.** 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 this directive.
 - a. The Department will ensure that information disseminated will be developed from reliable methods and data sources and will otherwise ensure information quality at each stage of information development. The methods for producing quality information will be made transparent, to the maximum extent practicable, through accurate documentation, use of appropriate internal and external review procedures, consultation with experts and users, and verification of its quality. Policies contained herein will be applied in a common sense and workable manner so as not to impose unnecessary administrative burdens that prohibit organizations from taking full advantage of the Internet and other technologies when disseminating information to the public.
 - b. Flexible, appropriate, and timely quality standards will be applied to the review and substantiation of information before it is disseminated. These quality standards will be incorporated into existing VA information resources management and administrative practices. Before disseminating information to members of the public, the originating office must ensure that the information is consistent with these standards and must decide that the information is of adequate quality for dissemination and maintain an administrative record of review procedures.

- c. Information dissemination products in all forms of media, e.g., printed and electronic (the Internet and other technologies), will be reviewed and substantiated by the originating office. Information dissemination products include books, papers, CD-ROMs, electronic documents, and other documentary materials. Web content or information disseminated by VA from a web page is included; however, requests for correction of typographical errors, web page malfunctions, and non-VA hyperlinks from a VA Website are not included. The following are excluded from the definition of disseminated information:
- (1) Information limited to Government employees or Department contractors or grantees, intra- or inter-Departmental use or sharing of Government information; including Inadvertent or Unauthorized Disclosure of Information intended only for Interagency and Intra-agency use or communication;
 - (2) Correspondence with individuals;
 - (3) Press releases (unless they contain new substantive information not covered by a previous information dissemination subject to the guidelines); archival records; library holdings and distribution limited to public filings, subpoenas, or adjudicative processes; fact sheets; press conferences or similar communications in any medium that announce, support the announcement, or give public notice of information VA has disseminated elsewhere;
 - (4) Responses to requests for Department records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar laws;
 - (5) Requests from individuals for correction of personal information or information related to death and disability payments, education, home loans, disability, medical care, insurance, burial and memorialization and survivor benefits, or related information pertaining to specific VA claims, benefits records, or services delivered;
 - (6) Opinions - if it is clear that what is being offered is someone's opinion rather than fact or the Department's views. However, any underlying information published by the Department upon which the opinion is based may be subject to these guidelines;
 - (7) Some Scientific Research - Scientific research conducted by Federally employed scientists or Federal grantees that publish and communicate their research findings in the same manner as their academic colleagues is not covered by these guidelines unless the agency represents the information as, or uses the information in support of, an official position of the agency;
 - (8) Public Filings - Information in public filings to the Department (such as public comments received by the Department in rulemaking proceedings), except where the Department distributes information submitted by a third party in a

- manner that suggests that the Department endorses or adopts the information, or indicates in its distribution that it is using or proposing to use the information to formulate or support a regulation, guidance, or other Departmental decision and/or position; and
- (9) Testimony and Other Submissions to Congress – Information presented or submitted to Congress which is simultaneously disseminated or previously disseminated to the public is exempt from this Information Quality Guideline.
- d. If the Department relies upon technical, scientific or economic information submitted or developed by a third party, that information is subject to the appropriate standards of objectivity and utility.
- e. For all information published, each Administration/Staff Office shall set forth administrative processes to allow affected persons to seek and obtain, where appropriate, corrected information and to appeal contested decisions, and inform users about corrections and revisions. Each Administration/Staff Office which disseminates information shall establish a system for receiving, tracking, and responding to requests for corrections in accordance with this directive. As a part of this process, web sites shall provide a means for affected persons to challenge the quality of disseminated information. In addition, Administrations/Staff Offices shall provide postal addresses of appropriate officials to contact through the mail to challenge the quality of disseminated information.
- f. Information Quality Challenge and Review Procedures: Due to mission-related information differences, the Department's Administrations/Staff Offices may vary in implementation approaches to information quality challenges and review procedures. However, the Department hereby adopts and includes in Departmental policy the basic guidance published by OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies; Republication, 67 Fed. Reg. 8452, (February 22, 2002).
- g. All information disseminated for which VA can reasonably discern will, or does, have a clear and substantial impact on important public policies or important private sector decisions will be considered influential information. VA's influential information includes the following categories:
- (1) Statistical information obtained from original data collections; administrative records; compilations of data from primary sources such as forecasts and estimates derived from statistical models, expert analyses, data collection, and analysis and interpretations of statistical information;
- (2) Financial information referring to Government revenues and expenditures; and

- (3) Scientific information designating the method of research in which a hypothesis, formulated after systematic, objective collection of data is tested empirically (relying on experiment and observation rather than theory).
- h. All influential information shall be subjected to a peer review. When a peer review is employed to help satisfy the objectivity standard, the review process employed shall meet the general criteria for competent and credible peer review recommended by OMB-Office of Information and Regulatory Affairs to the President's Management Council (2004/2005). OMB Memorandum M-05-03, "Issuance of OMB's 'Final Information Quality Bulletin for Peer Review,'" December 16, 2004, (OMB Memo M-05-03) further clarified via OMB Memorandum M-19-15, Improving Implementation of the Information Quality Act of April 24, 2019 (OMB Memo M-19-15).
- i. All scientific information shall follow the scientific integrity guidelines in accordance with the Presidential Memorandum on Scientific Integrity, March 9, 2009; 74 Fed. Reg. 10671-672, (March 11, 2009). In addition, this information will be considered highly influential if this information can be used in the future by VA or other stakeholders to make decisions. This information shall include internal and external peer review processes.

3. RESPONSIBILITIES.

- a. **Secretary of Veterans Affairs** shall designate the Assistant Secretary for Information and Technology (Chief Information Officer) as the senior Department official responsible for the Department's information and technology programs.
- b. **Assistant Secretary for Information and Technology/Chief information Officer (CIO) shall:**
- (1) Ensure compliance with requirements of Information Quality Act (Pub. L. 106-554, Division C, title V, Sec. 515; 114 Stat. 2763A-153 to 2763A-154 (2000) (codified at 44 U.S.C. § 3516);
 - (2) Establish Department-wide policies and procedures to ensure the quality of analytical and statistical information disseminated by VA;
 - (3) Appoint primary and alternate Influential Information Officers;
 - (4) Issue changes to the policies and procedures as necessary to implement and manage the non-influential information quality program; and
 - (5) Insure the IT system meet the standard necessary for VA personnel to accomplish the requirements outlined in this directive.

c. Under Secretaries, Assistant Secretaries, and Other Key Officials shall:

- (1) Establish an information quality program in their organizations for reviewing and substantiating the quality of information before it is disseminated;
- (2) Ensure that their information quality program adheres to the policies and procedures outlined in this directive;
- (3) Establish information correction and appeal procedures;
- (4) Appoint primary and alternate Influential Information Officers;
- (5) Provide the resources necessary to the Influential Information Officers to ensure full compliance with the requirements set forth in this policy.

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

- (1) Request 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;
- (4) Serve as VA's liaison officer with OMB and other Federal agencies regarding management and operations of the Influential Information quality program; and
- (5) Establish procedures and reporting requirements for monitoring non-financial information quality complaints and preparing recurring or ad hoc reports.

e. Assistant Secretary for Management and Chief Financial Officer shall:

- (1) Establish Department-wide financial policies and procedures to ensure the quality of financial information used for decision-making in VA;
- (2) Establish and maintain an administrative mechanism for tracking and reporting financial information;
- (3) Set forth the processes for the review and analysis of financial information;
- (4) Serve as VA's liaison officer with OMB and other Federal agencies regarding management of financial information; and

- (5) Establish procedures and reporting requirements for monitoring financial information quality complaints and preparing recurring and ad hoc reports.

f. Chief Research and Development Officer, VHA Office of Research and Development shall:

- (1) Serve as the Department coordinator for the highly Influential research information quality activities in accordance with provisions of this directive;
- (2) Establish and maintain an administrative mechanism for tracking and responding to highly influential research information corrections and appeals;
- (3) Set forth the processes to ensure the integrity for all scientific research information in accordance with the Presidential Memorandum on Scientific Integrity dated March 9, 2009, and the related Office of Science and Technology Policy Memorandum dated December 17, 2010, for the highly Influential Information peer reviews;
- (4) Serve as VA's liaison officer with OMB and other Federal agencies regarding management and operation of the highly influential research information quality program; and
- (5) Establish procedures and reporting requirements for monitoring highly influential research information quality complaints and preparing recurring and ad hoc reports.

g. Principal Executive Director, Office of Acquisition, Logistics and Construction shall set forth the policy and processes to ensure that information obtained from third parties through contracts comply with the information quality and the scientific integrity requirements.

h. Assistant Secretary for Public and Intergovernmental Affairs shall set forth policy and processes that guarantee the release of information to news media.

4. REFERENCES.

- a. Information Quality Act (Pub. L. 106-554, Division C, title V, Sec. 515, Dec. 21, 2000; 114 Stat. 2763A-153 to 2763A-154)
- b. Computer Security Act of 1987, 100 P.L. 235, 101 Stat. 1724
- c. Executive Order No. 12866, Regulatory Planning and Review, September 30, 1993
- d. Freedom of Information Act, (5 U.S.C. § 552)
- e. Memorandum for the Heads of Executive Departments and Agencies, Scientific Integrity, Office of Science and Technology Policy, December 17, 2010

- f. OMB Circular A-4, Regulatory Analysis, September 17, 2003
- g. OMB Circular A-130, Managing Information as a Strategic Resource, July 2016
- h. Paperwork Reduction Act of 1995, 44 U.S.C. Chapter 35
- i. Presidential Memorandum for the Heads of Executive Departments and Agencies, Scientific Integrity, March 9, 2009, 74 Fed. Reg. 10671-672, (March 11, 2009)
- j. VA Directive 6102, Internet/Intranet Services, July 15, 2008

5. DEFINITIONS.

- a. **Affected persons.** Those individuals or entities that may use, benefit, or be harmed directly by the disseminated information at issue.
- b. **Dissemination of information.** VA-initiated or sponsored distribution of information to the public. (See 5 C.F.R. § 1320.3(d) (definition of “Conduct or Sponsor”). Dissemination does not include distribution limited to: government employees or Department contractors or grantees; intra- or inter-agency use or sharing of government information; and responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar law. This definition also does not include distribution limited to: correspondence with individuals or persons, press releases, archival records, public filings, subpoenas, or adjudicative processes.
- c. **Highly Influential Information.** Highly influential information is a subset of influential scientific information. This information (i) has a potential impact of more than \$500 million in any one year on either the public or private sector; or (ii) is novel, controversial, or precedent-setting, or of significant interagency interest and may change the way in which VA conducts business now or in the future or (iii) the combination of this criteria.
- d. **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.
- e. **Influential Information.** 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 “information” itself, not to decisions that the information may support. To determine if the information is influential, the person reviewing it has to 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.” The criteria to be used to determine influential information is:

- (1) The information contributes to or supports a decision by a VA stakeholder and the same decision would be difficult to arrive at if that information was absent;
 - (2) if an Administration/Staff Office or an office uses the information as the principal basis for their position, including policy making and operational changes, and its presence has a clear and substantial impact;
 - (3) The data, analysis, or information published has the potential to be used by a stakeholder to create policy and make decisions.
- f. Integrity.** The protection of VA information from unauthorized, unanticipated, or unintentional access or revision to ensure that the information remains authentic and is not compromised.
- g. Objectivity.** Ensuring that disseminated information is presented in an accurate, clear, complete, and unbiased manner, and as a matter of substance, is accurate, reliable, and unbiased:
- (1) This involves whether the information is presented within a proper context. Sometimes, in disseminating certain types of information to the public, other information must also be disseminated in order to ensure an accurate, clear, complete, and unbiased presentation. Also, there is need to identify the sources/provenance of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a financial, or statistical context, the 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. Where appropriate, transparent documentation and error sources affecting data quality should be identified and disclosed to users.
 - (2) In addition, objectivity involves a focus on ensuring accurate, reliable, and unbiased information. In a scientific, financial, or statistical context, the original and supporting data shall be generated or provided, and the analytic results shall be developed, using sound statistical and research methods.
 - (3) If data and analytic results have been subjected to formal, independent, external peer review, the information may generally be presumed to be of acceptable objectivity. However, this presumption is rebuttable based on a persuasive showing by the petitioner in an instance.
- h. Peer Review Process.** Peer review is the evaluation of work by one or more people of similar competence to the producers of the work (peers). This process involves the deliberation and judgment of the appropriateness of the processes used the strength of the author's inferences. In essence, the peer review procedure helps ensure that the quality of the information meets the standards of the scientific and technical communities.

- i. **Quality.** The all-encompassing term that includes “utility,” “objectivity,” and “integrity” of VA information.
- j. **Reproducibility.** Disseminated information that can be substantially reproduced with essentially the same results, subject to an acceptable degree of imprecision or margin of error. Departmental Information Quality Guidelines do not require that all disseminated data be subjected to a reproducibility requirement. The Administration/Staff Office may identify, in consultation with the relevant scientific and technical communities, those types of data that can practically be subjected to a reproducibility requirement, given ethical, feasibility, or confidentiality constraints. Reproducibility of data is an indication of transparency about research design and methods and therefore a replication exercise (e.g., a new experiment, test of sample) shall not be required prior to each dissemination. With regard to analytical results related thereto, Department Information Quality Guidelines shall generally require sufficient transparency about data and methods that an independent reanalysis could be undertaken by a qualified member of the public. These transparency standards apply to Departmental analysis of data from a single study as well as to analyses that combine information from multiple studies.
- k. **Transparency.** The clear, obvious, and precise nature of the information. Making the data and methods publicly available will assist in determining whether analytic results are reproducible. However, the transparency standard does not override other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections. In situations where public access to methods and data cannot occur due to other compelling interests, the Administration/Staff Offices shall apply especially rigorous robustness checks to analytical results. The nature and results of these checks shall be documented. In all cases, there must be full disclosure of the nature of the specific databases used and the specific quantitative and statistical methods and assumptions that have been employed. Each Administration/Staff Office may define the nature of its checks for robustness checks and the level of detail for their documentation, in ways appropriate for it given the nature and multiplicity of issues for which the bureau or office is responsible.
- l. **Utility.** Refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the Department disseminates to the public, the agency needs to consider the uses the information not only from perspective of the Department but also from the perspective of the public. As a result, when transparency of information is relevant for assessing the information’s usefulness from the public’s perspective, the Department must take care to ensure that transparency has been addressed in its review of the information.