



SIGTARP

Special Inspector General for the Troubled Asset Relief Program

Information Quality Program

Introduction: Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554) (Information Quality Act) requires Federal agencies to issue guidelines ensuring and maximizing the quality, utility, objectivity, and integrity of disseminated information.

Purpose: This document explains the guidelines of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) with respect to implementation of the Information Quality Act. This document also establishes the procedures for individuals to seek correction of information that does not comply with the guidelines set forth herein, or with the Department of the Treasury (Treasury) agency-wide or the Office of Management and Budget (OMB) government-wide Information Quality Guidelines.

Please note that these guidelines and procedures:

- Do not create any legal rights or impose any legally binding requirements or obligations on SIGTARP or the public;
- Do not affect any otherwise available judicial review of agency action; and
- May be revised periodically.

Scope: All SIGTARP employees and contractors shall use these guidelines and procedures to ensure and maximize the utility, objectivity, integrity, reproducibility, and transparency of information maintained and disseminated by SIGTARP.

Based on OMB's definitions of "dissemination" and "information," several types of information disseminated by SIGTARP do not fall under these guidelines. Excluded categories include:

- Distributions intended to be limited to SIGTARP employees or contractors, such as internal operating procedures, training manuals, and requests for proposals;
- Intra- or inter-agency distributions or sharing of government information;
- Responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar law; and
- Correspondence with individual persons, press releases, archival records, public filings, and subpoenas or other documents prepared or released in the context of adjudicative processes.

Policy: It is the policy of SIGTARP to maximize the utility, objectivity, integrity, reproducibility, and transparency of the information disseminated to the public. SIGTARP employees and contractors shall take appropriate steps to incorporate these information quality guidelines into SIGTARP's information dissemination practices.

Information Quality Assurance: SIGTARP utilizes a variety of quality assurance methods and procedures to maximize information quality.

Utility

SIGTARP is committed to ensuring the usefulness of the information it disseminates to the public. To this end, SIGTARP evaluates information, as well as the appropriate form and vehicle for its dissemination, for timeliness and relevance. SIGTARP also organizes and presents information in a manner that facilitates its understanding by the intended audience.

Objectivity

SIGTARP is committed to disseminating information that is accurate, clear, complete, and unbiased. SIGTARP uses sound analytical techniques and carefully reviews the content of information it disseminates. This review includes the presentation of the information to ensure it has the proper context. Where appropriate, SIGTARP also identifies the sources of supporting data so that the public can assess the objectivity of those sources.

Integrity

SIGTARP maintains a comprehensive information security program to ensure information integrity, including rigorous controls in accordance with regulatory requirements and sound security practices. These controls ensure that each major information security component has a level of security commensurate with the risk and magnitude of harm that could result from the loss, misuse, unauthorized disclosure, or improper modification of information maintained by SIGTARP.

Influential Information, Reproducibility, and Transparency

“Influential” is a specialized term that means certain scientific, financial or statistical information that SIGTARP can reasonably determine will have or does have a clear and substantial impact on important public policies or important private sector decisions. Consistent with the scope of these procedures, the term "influential" applies only to certain scientific, financial or statistical information and does not apply to policy decisions that the information may support. Influential information is subject to reproducibility and transparency requirements. Reproducibility of information refers to the ability, in principle, for a qualified individual to use the documentation of methods, assumptions, and data sources to achieve substantially the same information, subject to an acceptable degree of imprecision. Transparency means that the sources, methods, procedures, references, and assumptions employed to create the information are provided, except in circumstances where information is confidential and therefore cannot be released to the public.

Any information deemed to be "influential" as defined in these guidelines is reviewed by appropriate levels of management to ensure adequate transparency about underlying data sources, as well as methods, procedures, references, and assumptions used, to facilitate reproducibility of the information.

Procedures to Seek Correction of Information:

Request for Correction

Any individual seeking correction of disseminated information shall submit a request to SIGTARP's Chief Information Officer. All requests should:

- Describe in detail the information, such as including the name of the report or data product where the information is located or the date of issuance;
- State how the information does not comply with these guidelines, or with Treasury or OMB Information Quality Guidelines;
- State how the individual was affected and how correction can or will be beneficial; and
- If possible, provide supporting documentary evidence, such as comparable data or research results on the same topic, and identify the proposed correction or remedy.

Individuals shall submit the request by mail or e-mail to the following address:

Mail: SIGTARP
ATTN: Chief Information Officer
1801 L St. NW
4th Floor
Washington, D.C. 20220

Email: SIGTARP@treasury.gov

Responding to a Request

SIGTARP will coordinate requests with the office that generated the information in question and prepare a response to the requesting individual within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, SIGTARP will provide notice to the individual, indicating the reason for the additional time and an estimated decision date.

In determining whether to correct information, SIGTARP reserves the right to deny requests. SIGTARP will provide the reason or justification for any denial, as well as information regarding the individual's right to appeal.

If a correction is warranted, SIGTARP will publish the action(s) planned based on the significance and magnitude of the correction and the nature, influence, and timeliness of the information.

Right to Appeal

An individual must submit an appeal to SIGTARP's Deputy Special Inspector General for Management and Administration within 45 calendar days of receipt of the denial letter. SIGTARP will respond to appeals within 60 calendar days of receipt. If the appeal requires more

than 60 calendar days to resolve, SIGTARP will provide notice to the individual, indicating the reason for the additional time and an estimated decision date.

Individuals shall submit an appeal by mail or e-mail to the following address:

Mail: SIGTARP
ATTN: Deputy Special Inspector General for Management & Administration
1801 L St. NW
4th Floor
Washington, D.C. 20220

Email: SIGTARP@treasury.gov

The Deputy Special Inspector General for Management and Administration, or a designee who is also independent of the initial response, will render the final determination with respect to the appeal.

Compliance Reporting: SIGTARP maintains requests for correction of information and related records and the statistics necessary for reports required by Treasury or OMB.

Privacy Act Statement: SIGTARP respects the privacy of individuals requesting correction of information. It employs safeguards to prevent the misuse of personally identifiable information. SIGTARP will only utilize personally identifiable information provided in a request to respond to the individual, and will only disclose the information if required by law.