Management Instruction

Information Quality Program

This revised Directive provides guidance and procedures with respect to the Information Quality Program of the Office of the Special Inspector General for the Trouble Asset Relief Program (SIGTARP).

Background

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

This document explains the guidelines of SIGTARP regarding implementation of the 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.

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. Not all information constitutes “disseminated information.” See the below definitions of dissemination and information for exclusions.

Definitions

Dissemination: an agency initiated or sponsored distribution of information to the public. Dissemination does not include distribution limited to government employees or agency 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 laws. This definition also does not include distribution limited to correspondence with individuals or persons, press releases, archival records, public filings, subpoenas or adjudicative processes.

Influential: When used in the phrase “influential scientific, financial, or statistical information”, means that the agency 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.

**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.

**Integrity**: the protection of information from unauthorized, unanticipated or unintentional modification, or from being compromised through corruption or falsification.

**Objectivity**: information that is accurate, clear, complete, and unbiased.

**Quality**: an encompassing term comprising utility, objectivity, and integrity.

**Reproducibility**: information that is capable of being substantially reproduced, subject to an acceptable degree of imprecision.

**Transparency**: 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.

**Utility**: the usefulness of information to its intended users, including the public.

**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 the below 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**
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.

**Roles and Responsibilities**

**Divisional Deputy Special Inspectors General:**
- Ensure employees are aware of and adhere to these information quality guidelines; and
- As appropriate, review disseminated information, including influential information, to ensure that it complies with these information quality guidelines.

**The Deputy Special Inspector General for Management and Administration, or a designee:**
- In accordance with the procedures established herein, receives and responds to information quality correction appeals.

**The Chief Information Officer:**
- In accordance with the procedures established herein, receives and responds to information quality requests for correction; and
- Maintains official records on information quality requests for correction necessary for annual reporting.

**Employees:**
- Comply with all established information quality guidelines; and
- Where appropriate, assist management in responding to information quality requests for correction or appeals.

**Compliance**

Failure to follow this Directive may result in disciplinary or adverse action.
Waivers

There are no exceptions to this Directive.

Audit Procedures

The Principal Deputy Special Inspector General shall conduct a biennial review of this Directive.

References

All applicable Federal law and guidelines, including the following:

- Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554)

Contact Information

For additional information, contact:

Chief Information Officer
SIGTARP Executive Office
1801 L Street, NW
Washington, DC 20220