



COMDTINST 5210.11
AUG 5, 2004

COMMANDANT INSTRUCTION 5210.11

Subj: COAST GUARD DATA QUALITY MANAGEMENT FOR PUBLICLY DISSEMINATED INFORMATION

- Ref: (a) Office of Management and Budget (OMB) "Final Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies," 67 Federal Register 8452 of 22 February 2002
 (b) "Information Quality," Department of Homeland Security Management Directive 8200
 (c) Use and Management of Coast Guard Internet and Intranet Web Sites, Content, and Access, COMDTINST 5230.62 (series)

- PURPOSE.** To achieve the E-Government initiative of the President' Management Agenda, it is important that the public is assured that Coast Guard information is accurate and unbiased. As such, this Instruction promulgates policy and procedures for all commands to follow to ensure and maximize the quality, objectivity, utility, and integrity of Coast Guard's disseminated information per the provisions of references (a) and (b). Further, this new Program establishes an administrative mechanism to allow affected persons to seek redress and obtain correction/remediation of information maintained and disseminated by the Coast Guard. As is the intent of the Office of Management and Budget (OMB) and the Department of Homeland Security, these guidelines will focus primarily on the dissemination of substantive information (e.g., reports, analyses, studies, and summaries), rather than information pertaining to basic agency operations.
- ACTION.** Area and district commanders, commanders of maintenance and logistics commands, commanding officers of headquarters units, assistant commandants for directorates, Chief Counsel, and special staff offices at Headquarters shall ensure that the provisions of this Instruction are followed. Internet release authorized.
- DIRECTIVES AFFECTED.** None.

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4. DISCUSSION. E-Government is streamlining service and delivery of information to citizens primarily through heightened use of the Internet, resulting in reduced paperwork burdens on businesses, and greater efficiencies and effectiveness. Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-154; H.R. 5658) directed the Office of Management and Budget (OMB) to issue government-wide guidelines that “provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies” subject to the Paperwork Reduction Act (44 U.S.C. Chapter 35). Although traditionally members of the public have been able to comment on certain docket related agency information through the rulemaking/adjudicative processes posted in the Federal Register preliminary to final determinations, affected persons now have additional administrative remedies with this new Program to contest information quality on a timely basis.
 - a. Information is a critical resource, second only to human resources. It is vital not only to our daily operations, but also is an essential element in fulfilling Coast Guard’s missions. Information quality shall be treated as integral to every step of development of information, including creation, collection, maintenance, and dissemination. Further, in the course of work, a wide variety of information products for public use are generated. Examples include: statistical reports; studies of important safety and other security issues; analyses of the costs and benefits of regulations and policies; scientific reports; and environmental assessments.
 - b. As public servants, we are obligated to ensure that all Coast Guard information products consistently meet or exceed high standards of quality. This process shall enable the Coast Guard to substantiate the quality of the information it has disseminated through documentation or other means appropriate for the information.
5. DEFINITIONS. The Coast Guard has adopted the following definitions of terms set forth in Office of Management and Budget’s Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, <http://www.whitehouse.gov/omb/fedreg/reproducible.html>:
 - a. Affected Persons are citizens who may benefit or be harmed by the disseminated information. This includes persons who are seeking to address information about themselves, as well as persons who use subject information.
 - b. Quality is an encompassing term comprised of the statutory terms: utility, objectivity, and integrity, collectively referred to as “quality.”
 - c. Utility refers to the usefulness of the information to its intended users, including the public.
 - d. Objectivity is comprised of two distinct elements: presentation and substance. Disseminated information must be presented in an accurate, clear, complete and unbiased manner. In a scientific, financial, or statistical context, the original and supporting data shall be generated, and the analytic results shall be developed, using sound statistical and research methods. Where appropriate, data shall have full, accurate, and transparent documentation; and error sources affecting data quality shall be identified and disclosed to users. The objectivity standard does not

override other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections.

- e. Integrity refers to the security and protection of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification.
- f. Information is defined as 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.
- g. Government information is defined as information created, collected, processed, disseminated, or disposed of by or for the Federal Government.
- h. Information dissemination products include any book, paper, map, machine-readable material (including CD-ROMs and web pages), audiovisual production, or other documentary material, regardless of physical form or characteristic, disseminated by an agency to the public.
- i. Dissemination is the initiated or sponsored distribution of information to the public (see 5 C.F.R. 1320.3(d) (definition of "Conduct or Sponsor")). It does not include distribution limited to:
 - (1) government employees or agency contractors or grantees;
 - (2) intra- or inter-agency use or sharing of government information;
 - (3) responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee or other similar law;
 - (4) correspondence with individuals or persons;
 - (5) press releases;
 - (6) archival records;
 - (7) public filings; and
 - (8) subpoenas, or adjudicative processes.
- j. Influential, when used in the phrase "influential scientific, financial, or statistical information," means "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 that has an intense impact on a broad range of parties would be regarded as influential.
- k. Reproducibility means that the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. If an agency is responsible for disseminating influential

scientific, financial, or statistical information, agency guidelines shall include a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties. This reproducibility standard is intended to ensure that information disseminated by agencies is sufficiently transparent in terms of data and methods of analysis such that replication is feasible.

- l. Transparency includes both presentation and reporting of information sources and limitations.
- m. Data Quality Official is the designated representative in the Assistant Commandant for Command, Control, Communications, Computers and Information Technology, Commandant CG-61, responsible for compiling agency reports and serving as the agency liaison to the Department of Homeland Security (DHS).
- n. Docket Management System (DMS) is an electronic, image-based database in which docketed information is stored for easy research and retrieval.
- o. Docket is an official public record, including, but not limited to proposed and final regulations, copies of public comments on proposed rules, and related information used when making regulatory and adjudicatory decisions. Specific documents covering the same issues are stored together in a docket, with on-line review available to interested parties. To date, Coast Guard has been publishing and storing information regarding dockets on-line in the Department of Transportation's (DOT's) DMS, and will temporarily continue to use it for existing dockets, as well as for storing/transmitting requests for correction/remediation of information under the Data Quality Program.

6. RESPONSIBILITIES.

- a. Coast Guard Data Quality Official (DQO). The Coast Guard DQO shall serve as the point of contact for the Departmental Chief Information Officer/Data Quality Administrator and be responsible for implementation of these guidelines within the Coast Guard. The DQO shall serve on the Internet Content Working Group, a sub-group of the Web Advisory Board (WAB), to ensure the provisions of this Instruction are addressed.
- b. Internet Content Working Group (ICWB). While serving on the ICWB, the DQO (Commandant CG-61) shall ensure coordination with the Offices of Chief Counsel (G-L) and Public Affairs (G-IPA) to address the following content related issues on the Web:
 - (1) Establish and define standards and methodologies for Web Content/Program Managers to follow to ensure data quality prior to dissemination.
 - (2) Develop the process for responding to requests for correction/remediation of an information product from affected persons.
 - (3) Establish a reporting system meeting OMB reporting requirements.
 - (4) With respect to "influential" information, maintain internal records of what additional standards will be applied to ensure its quality.

- (5) Establish guidelines Web Content/Program Managers may use to substantiate origin of data (including data from an external source) when providing information being disseminated.
- c. Dissemination Parameters. The majority of the agency's data/documents are disseminated via the Internet. Reference (c) establishes responsibilities for both Web Content Managers (WCMs) and Providers to ensure that posted content "adheres to ...other policies, laws, regulations and guidance..." Further, the Instruction stipulates that WCMs "review and approve web content within their area of responsibility."
- d. Requests for Correction/Remediation of Information.
- (1) The Coast Guard shall respond to requests for correction/remediation of information in a manner appropriate to the nature and extent of the request. Examples of appropriate responses include personal contacts via letter or telephone, form letters, press releases or mass mailings correcting a widely disseminated error or addressing a frequently raised complaint.
 - (2) If individuals perceive they are affected/harmed because the disseminated information (on or after 1 October 2002) does not meet the requisite quality standards of OMB's guidelines, they may seek corrective action/remediation regarding the information. It should be noted that the burden of justification demonstrating the need for correction of information rests with the individual.
 - (3) Information originally disseminated before October 1, 2002, is subject to this correction/remediation process only if it remains readily available to the public (e.g., it is posted on a Coast Guard website) and continues to play a significant, active role in Coast Guard programs or in private sector decisions.
 - (4) The main components of this policy are as follows:
 - (a) Requests for correction/remediation of information or requests for reconsideration can be made via DOT's on-line correction request form (accessible from the Department's DMS or the customer support web site (<http://dotnet.dot.gov/feature/infocorrection.asp>)). Additionally, letters should be faxed to (202) 366-7202 or sent to the following address:

US Department of Transportation
Office of Dockets and Media Management
ATTN Request for Correction of Information
400 7th Street SW Room PL 401
Washington, DC 20590

Note: Requests for reconsideration should include a reference to the initially assigned DOT docket number. This will enable the DMS to place the request in the same docket as the initial request.
 - (b) Incoming requests for correction, requests for reconsideration and responses will be posted on DOT's DMS website, which will electronically notify designated Program

Managers that a request for correction/reconsideration is pending. Note: If Coast Guard staff receives requests for correction/reconsideration by another means (e.g., mail), they are to refer the requests to DOT's Office of Dockets and Media Management for inclusion in the DMS, unless they involve information protected from release by law.

(c) Incoming requests for correction/reconsideration must meet the following criteria:

1. A statement that the request for correction of information is submitted under the provisions of references (a) and (b).
2. The name, mailing address, fax number, or e-mail address, telephone number and organizational affiliation, if any.
3. A description of how the information in question affects the individual (e.g., how an alleged error is harmful, and/or how the correction will be beneficial).
4. Clear identification of the report, data set, or other document containing the information requested for correction. This includes such identifying characteristics as title, date, and how information was received (e.g., web-accessed, etc). General statements alleging some type of error are insufficient. Those affected persons providing evidence supporting the request for correction will be more persuasive than requests that are general, unfocused, or simply indicate disagreement with the information in question.

(d) Requests for correction/remediation of information may be rejected for the following reasons:

1. The Coast Guard did not disseminate the information;
2. It is determined that the requester is not affected by the information;
3. Subject information is not covered by the guidelines;
4. The request for correction/remediation is frivolous, not germane to the substance of the information in question, or cost prohibitive; and
5. The request for correction cannot be substantiated by factual evidence.

(e) Administrative Appeals. Commandant (G-IPA) shall serve as the final resolution authority for unremediable cases.

7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS. Environmental considerations were examined in the development of this Instruction and have been determined to be not applicable.
8. AGENCY REPORTING REQUIREMENTS. On a fiscal-year basis, COMDT (CG-61) must submit information to the DHS Quality Office on behalf of the Coast Guard for inclusion in its report to the

Director, OMB, providing the number, nature and resolution of complaints received by the agency meeting OMB guidelines.

9. FORMS/REPORTS. An online form, "Request to Seek Correction of Information," is available at <http://dotnet.dot.gov/feature/infocorrection.asp>.

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