

# **INFORMATION QUALITY MANAGEMENT FOR PUBLICLY DISSEMINATED INFORMATION**



**COMDTINST 5210.11A**

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COMMANDANT INSTRUCTION 5210.11A

Subj: INFORMATION QUALITY MANAGEMENT FOR PUBLICLY DISSEMINATED  
INFORMATION

Ref: (a) Information Quality Implementation, DHS Directive 139-02-001  
(b) Information Quality, DHS Directive 139-02  
(c) Use and Management of Coast Guard Internet and Intranet Web Sites, Content, and  
Access, COMDTINST 5230.62 (series)  
(d) Public Law 106-554, "Treasury and General Government Appropriations Act for Fiscal  
Year 2001," December 21, 2000

1. PURPOSE. To achieve the ongoing E-Government initiatives of the President's Management Agenda, it is important that the public is assured that United States Coast Guard information is accurate and unbiased as possible. As such, this Instruction promulgates policy 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 Instruction 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, this policy will focus primarily on the dissemination of substantive information (e.g., reports, analyses, studies, and summaries), rather than information pertaining to basic agency operations.
2. 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.
3. AUTHORIZED RELEASE. Internet release is authorized.
4. DIRECTIVES AFFECTED. The Coast Guard Data Quality Management for Publicly Disseminated Information, COMDTINST 5210.11 is hereby cancelled.
5. BACKGROUND.
  - a. This Directive establishes the Coast Guard policies and responsibilities for ensuring

and maximizing the quality, utility, objectivity, and integrity of disseminated Coast Guard information to the public and facilitates Coast Guard compliance with applicable legal requirements, including those associated with Public Law 106-554, "Treasury and General Government Appropriations Act for Fiscal Year 2001." Section 515 of this act requires federal agencies to issue guidelines ensuring and maximizing the quality, utility, objectivity and integrity of disseminated information. Recent innovations in information generation and management have significantly increased information availability, requiring all federal agencies to revisit their dissemination control procedures and ensure adherence to appropriate information quality (IQ) standards.

- b. Information is a critical resource and is vital not only to our daily operations, but also is an essential element in fulfilling Coast Guard's missions and is essential to prudent decision making which depend on reliable, high-quality information. 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, wide varieties 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. 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.
6. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide administrative guidance for Coast Guard personnel and is not intended nor does it impose legally-binding requirements on any party outside the Coast Guard.
7. MAJOR CHANGES. The Coast Guard Data Quality Official (DQO) will be referred to as the Coast Guard Information Quality Official (IQO). The IQO will be responsible for publishing the IQ standards on the component's internet website and submit quarterly reports to the DHS IQ officer regarding issues with the compliance guidelines. In addition, the IQO will report any pertinent information requested by the DHS IQ Officer to complete the annual report to OMB. The implementation of the Administrative Complaint Mechanism for objections or appeals with IQ will be available along with the Administrative appeal process, which can be utilized in the event a requestor is not satisfied with the response or decision.
8. SCOPE AND AUTHORITIES.
  - a. This Instruction applies throughout Coast Guard to:
    - (1) Influential scientific, financial, or statistical information disseminated to the public in any medium including textual, graphic, cartographic, narrative, numerical, or audiovisual forms;

- (2) Coast Guard-sponsored distribution of information (where the agency directs a third party to distribute information, or the agency has the authority to review and approve the information before release); and
  - (3) Information posted on the Coast Guard public website (www.uscg.mil) and the public website of DHS (www.dhs.gov).
- b. This Instruction **does not** apply to information disseminated in the following contexts:
- (1) Between government employees, agency contractors, or grantees;
  - (2) Interagency use or sharing of government information;
  - (3) Hyperlinks posted on the Coast Guard public website (www.uscg.mil) and the DHS website that are disseminated and posted elsewhere by others;
  - (4) Correspondence with individual persons, press releases, archival records, public filings, subpoenas, or adjudicative processes; and
  - (5) Responses to requests for agency records under the Freedom of Information Act, the Privacy Act of 1974, the Federal Advisory Committee Act, or other similar laws.
- c. This Instruction **will not**:
- (1) Supersede any law, regulation, or other policy concerning privacy, trade secrets, intellectual property, or other confidentiality requirements. Offices should, however, still seek to maintain quality, objectivity, utility, and integrity in the materials;
  - (2) Affect any otherwise available judicial review of agency action;
  - (3) Apply to opinions where the agency's presentation makes it clear that the material is an opinion or the agency's views rather than fact; and
  - (4) Apply to any patents, trademarks, copyrights, licenses or any other documents filed by the Coast Guard Office of General Counsel on behalf of a Coast Guard program at another agency, for DOJ, for a Court, or to a third party.
- d. Notwithstanding the scope described above, which applies only to disseminated information, all Coast Guard personnel and officials are encouraged to adopt a basic standard of quality (including objectivity, utility, and integrity), whenever practicable, as part of their information management practices.

It is recommended the reader become familiar with the directives and publications noted throughout this Instruction.

9. IMPACT ASSESSMENT. This Instruction does not require the designation of any special position or collateral duty. However, the quality and veracity of information published by the Coast Guard is the responsibility of all Coast Guard Members.
10. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS. The Office of Environmental Management, Commandant (CG-47) reviewed this Commandant Instruction

and the general policies contained within, and determined that this policy falls under the Department of Homeland Security (DHS) categorical exclusion A3. This Commandant Instruction will not result in any substantial change to existing environmental conditions or violation of any applicable federal, state, or local laws relating to the protection of the environment. It is the responsibility of the action proponent to evaluate all future specific actions resulting from this policy for compliance with the National Environmental Policy Act (NEPA), other applicable environmental requirements, and the U.S. Coast Guard Environmental Planning Policy, COMDTINST 5090.1 (series).

11. DISTRIBUTION. No paper distribution will be made of this Instruction. An electronic version will be located in the Coast Guard Directives System Library internally, and if applicable on the Internet at: [www.dcms.uscg.mil/directives](http://www.dcms.uscg.mil/directives) .
12. RECORDS MANAGEMENT CONSIDERATIONS. Records created as a result of this Instruction, regardless of format or media, must be managed in accordance with the records retention schedules located on the Records Resource Center SharePoint Online site: <https://uscg.sharepoint-mil.us/sites/cg61/CG611/SitePages/Home.aspx> .
13. DEFINITIONS. The Coast Guard has adopted the following definitions of terms set forth in the DHS Information Quality Implementation 139-02-001:
  - a. Affected Persons: Individuals 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 information.
  - b. Dissemination: Agency initiated or sponsored distribution of information to the public [see Title 5, Code of Federal Regulations, Section 1320.3(d) (definition of "Conduct or Sponsor")].
  - c. Government information: Information created, collected, processed, disseminated, or disposed of by or for the Federal Government.
  - d. 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. Each agency is authorized to define "influential" in ways appropriate for it given the nature and multiplicity of issues for which the agency is responsible. Agency definitions and determinations do not preempt agency requirements for rulemaking under existing statutes and executive orders.
  - e. 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. Unlike the OMB Circular A-130 definition for information, 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.
  - f. Information dissemination product: Any book, paper, map, machine-readable material,

audiovisual production, or other documentary material, regardless of physical form or characteristic, an agency disseminates to the public. This definition includes any electronic document, electronic storage device, or web page.

- g. Integrity: Refers to the security of information or the protection of information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.
- h. Objectivity: Involves two distinct elements: presentation and substance.
  1. "Objectivity" includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within a proper context. Sometimes, in disseminating certain types of information to the public, other information is disseminated in order to ensure an accurate, clear, complete, and unbiased presentation. In addition, the Department/Agency needs to identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a scientific, 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, data should have full, accurate, 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 is generated, and the analytic results are developed, using sound statistical and research methods.
    - a. 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 refutable based on a persuasive showing by the petitioner in a particular instance. If department/agency-sponsored peer review is employed to help satisfy the objectivity standard, the review process employed meets the general criteria for competent and credible peer review recommended by OMB's Office of Information and Regulatory Affairs to the President's Management Council, date September 20, 2001, namely, "that
      - (1) peer reviewers be selected primarily on the basis of necessary technical expertise,
      - (2) peer reviewers be expected to disclose to agencies prior technical/policy positions they may have taken on the issues at hand,
      - (3) peer reviewers be expected to disclose to departments/agencies their sources of personal and institutional funding (private or public sector), and

(4) peer reviews be conducted in an open and rigorous manner."

- b. If an agency is responsible for disseminating influential scientific, financial, or statistical information, agency guidelines will include a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties.
- i. Quality: Is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these four statutory terms, collectively, as "quality."
- j. Reproducibility: The information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. For information judged to have more (less) important impacts, the degree of imprecision that is tolerated is reduced (increased). If agencies apply the reproducibility test to specific types of original or supporting data, the associated guidelines provides relevant definitions of reproducibility (e.g., standards for replication of laboratory data). With respect to analytic results, "capable of being substantially reproduced" means that independent analysis of the original or supporting data using identical methods would generate similar analytic results, subject to an acceptable degree of imprecision or error.
- k. Utility: Refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the department/agency disseminates to the public, the agency needs to consider the uses of the information not only from the perspective of the agency 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 agency takes care to ensure that transparency has been addressed in its review of the information.
- l. Information 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). This position will transfer to the Chief Data Officer, Office of Data and Analytics, or equivalent office upon creation of such positions or office.

#### 14. RESPONSIBILITIES.

- a. Coast Guard Information Quality Official (IQO). The Coast Guard IQO 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 CG IQO shall serve on necessary workgroups IAW Reference (a), as required, to ensure the provisions of this Instruction are addressed, and do the following:
  - (1) Post IQ standards on the Component internet web site;
  - (2) On a quarterly basis, submit reports to the DHS IQ Officer, which identify the number and natures of RFCs received regarding compliance with the guidelines, and explain how the requests for correction were resolved; and



- (3) Submit the reports and information as requested by the DHS IQ Officer to complete the annual report to OMB.
- b. 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, Reference (c) stipulates that WCMs "review and approve web content within their area of responsibility."
15. AGENCY REPORTING REQUIREMENTS. On a fiscal-year basis, the Coast Guard IQO must submit information to the DHS Quality Office for inclusion in its report to as described in section 14a(2) of this Instruction.
16. REQUESTS FOR CORRECTION/REMEDICATION OF INFORMATION.
- a. 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.
- b. 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.
- c. 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.
- d. The Administrative Complaint Mechanism for this policy is as follows:
- (1) Section 515 requires each agency to develop an administrative mechanism for receiving complaints and appeals regarding IQ. DHS has established this structure. Any person or organization may assert a claim that Coast Guard information does not comply with OMB or DHS guidelines, and, if appropriate, may petition for correction or remedy. Using the administrative mechanism outlined below, affected persons can seek, and obtain where appropriate, timely correction of Coast Guard information that does not comply with OMB or DHS guidelines. Direct IQ complaints to the Coast Guard IQO (per submission instructions on the DHS Internet site) to:

DEPARTMENT OF HOMELAND SECURITY  
ATTN: OCIO/INFORMATION QUALITY OFFICER MAIL STOP 0136  
DEPARTMENT OF HOMELAND SECURITY  
301 7TH ST SW  
WASHINGTON, DC 20528-0136  
Email: DHS.InfoQuality@hq.dhs.gov  
DHS Website: <http://www.dhs.gov/dhs-information-quality-standards>

- (2) Complaint Review and Resolution: The IQO responds to complaints and/or requests for correction within 120 days of receipt. All materials responsive to an IQ complaint are collected and processed by the IQO within the 120-day research and response period. The IQO should share draft responses and appeals with DHS prior to release to the petitioner.
- (3) After thorough review and conclusion, a response is sent to the petitioner on whether and how the correction is made. Any releasable information may be sent to the petitioner along with the written response. If applicable, the written response may also indicate the type of material withheld, the exemptions claimed, and the right to administratively appeal any denial of information.
- (4) Administrative Appeal Process
  - a. DHS has developed an administrative appeal process in the event a petitioner is not satisfied with the reply. This right to appeal is included in the notice of denial issued during the complaint process.
  - b. For DHS Support Components (except the Federal Law Enforcement Training Centers) the responsible official is the DHS Chief Information Officer (CIO) or designee, unless that person is the same person who participated in the initial response to petitioner. In such event, the CIO or designee shall designate a different person within DHS OCIO, to coordinate the appeal process. In turn, such person shall request that the Component having IQ functions appoint an official to administer the IQ appeals, unless such person has participated in the initial response. In the appeal, the DHS CIO (or Component Appeal Official), or their designee, shall determine if DHS has properly administered and complied with IQ rules and regulations regarding request for correction or remedy, and undertake a discussion of why the request is not acceptable.
  - c. After the petitioner receives a response or decision from the Department on a complaint, the incumbent sends their appeal of the ruling within 30 calendar days of the decision date. Direct the appeals to:

DEPARTMENT OF HOMELAND SECURITY  
ATTN: OCIO/INFORMATION QUALITY OFFICER MAIL STOP 0136  
DEPARTMENT OF HOMELAND SECURITY  
301 7TH ST SW  
WASHINGTON, DC 20528-0136

Email: [DHS.InfoQuality@hq.dhs.gov](mailto:DHS.InfoQuality@hq.dhs.gov)

DHS Website: <http://www.dhs.gov/dhs-information-quality-standards>

- d. Upon receipt, the IQ Officer forwards the appeal to the DHS CIO or Component Appeal Official.
  - e. DHS responds to appeals and/or requests for correction within 120 days of receipt. If the appeal requires an extended period for processing, the Department notifies the petitioner.
  - f. The Appeal Official's decision is the final step in the Department's administrative appeal process.
- (5) Exclusions: Certain disseminations of information include a comprehensive public comment process (e.g., notices of proposed rulemaking, regulatory analyses and requests for comment on an information collection subject to the Paperwork Reduction Act). The administrative complaint mechanism described in this Instruction does not apply to such documents. Persons questioning information disseminated as listed in Section 8(b) will need to make those requests following the approved Department process.
17. FORMS/REPORTS. There are no forms associated with this instruction.
18. SECTION 508. This Instruction adheres to Accessibility Guidelines and Standards as promulgated by the U.S. Access Board. If changes are needed, please communicate with the Coast Guard Section 508 Program Management Office at [Section.508@uscg.mil](mailto:Section.508@uscg.mil) .
19. REQUEST FOR CHANGES To recommend change to this Instruction, please submit a formal request to [hqs-smb-directives@uscg.mil](mailto:hqs-smb-directives@uscg.mil) .

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