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INFORMATION QUALITY PROGRAM

REVIEW DATE: December 13, 2022

1.0 PURPOSE

The purpose of this circular is to establish the information quality guidelines of the Bureau of Engraving and Printing (Bureau/BEP) to ensure and maximize the utility, objectivity, and integrity of the information maintained and disseminated within and outside of the BEP.

In addition, this circular establishes the procedures for affected individuals to seek and obtain correction of information maintained and disseminated by BEP that does not comply with the standards set out in this circular, the Department of the Treasury (Treasury) agency-wide or the Office of Management and Budget (OMB) government-wide Information Quality Guidelines.

These guidelines do not apply to information disseminated in the following contexts:

- Dissemination of information limited to BEP employees or contractors;
- Dissemination of information limited to intra- or inter- agency use or sharing of BEP information;
- Correspondence with individuals, press releases, archival records, public filings, subpoenas or adjudicative processes; or
- Response to requests for BEP records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar laws.

These Guidelines apply to information disseminated by BEP on or after October 1, 2002, regardless of when the information was first disseminated.

2.0 SCOPE

All BEP employees and contractors in the District of Columbia Facility (DCF) and the Western Currency Facility (WCF) shall use these quality guidelines to ensure and maximize the utility, objectivity, and integrity of information maintained and disseminated by BEP.

3.0 POLICY

It is the policy of the BEP to ensure and maximize the utility, objectivity, and integrity of the information disseminated within and outside of the BEP. BEP employees and contractors shall take appropriate steps to incorporate information quality criteria into BEP’s information dissemination practices and ensure the quality of information disseminated is in accordance with the standards set forth in these guidelines. BEP is committed to integrating the principle of information quality into the development of information throughout its creation, collection, maintenance, and dissemination.

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BEP employees and contractors shall comply with all legal statutes, policy rules, regulations, directives, and guidance at every step of the process for preparing and disseminating information.

4.0 SUPERSESSION

This circular supersedes Circular No. 40-00.13, "Guidelines for Implementation of Information Quality Law", dated September 23, 2002.

5.0 AUTHORITIES AND REFERENCES

- 5.1 [Section 515](#) of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; H.R. 5658).
- 5.2 Paperwork Reduction Act of 1995, [44 USC Chapter 35](#) (Public Law 104-13).
- 5.3 Federal Information Security Management Act of 2002, 44 USC § 3541, et seq.
- 5.4 National Institute of Standards and Technology (NIST) Federal Information Processing Standards ([FIPS](#)) [199](#), Standards for Security Categorization of Federal Information and Information Systems, Feb 2004
- 5.5 NIST [FIPS 200](#), Minimum Security Requirements for Federal Information and Information Systems, March 2006
- 5.6 E-Government Act of 2002 ([Public Law 107-347](#), [116 Stat. 2899](#)).
- 5.7 Clinger-Cohen Act, 40 USC § 1401 et. Seq. (Public Law 104-106).
- 5.8 [OMB Circular A-130](#), Managing Information as a Strategic Resource, dated July 28, 2016.
- 5.10 OMB Memorandum 17-06, Policies for Federal Agency Public Websites and Digital Services, dated November 8, 2016.
- 5.11 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.
- 5.12 Department of the Treasury, Information Quality Program, <https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/infoqual.aspx>

6.0 DEFINITIONS

- 6.1 **Quality.** To maximize information quality, BEP procedures focus on the three underlying requirements for quality: utility, objectivity, and integrity of information for creating transparent and reproducible results.
- 6.2 **Utility.** Utility involves the usefulness and availability of the information to its intended audience. To produce useful, policy-relevant information, program offices must stay informed of information needs, and develop new data, models, and information products where appropriate. Program offices will stay abreast of information needs through active and ongoing contact with the community.
- 6.3 **Objectivity.** Objectivity involves a focus on ensuring information is accurate, reliable, unbiased, and presented in a clear, complete, and well-documented manner. Objectivity is achieved by having information products prepared and

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reviewed by qualified people using reliable data sources, sound analytical techniques, and proven methods.

- 6.4 **Integrity.** Integrity refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification.
- 6.5 **Information.** Any communication or representation of knowledge such as facts or data available in any medium or form, e.g., textual, numerical, graphic, cartographic, narrative, or audiovisual. This definition includes any communication or representation of knowledge 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.
- 6.6 **Government information.** Information created, collected, processed, disseminated, or disposed of by or for the federal government.
- 6.7 **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, CD-ROM, or web page.
- 6.8 **Dissemination.** BEP initiated or sponsored distribution of information to the public (see 5 CFR 1320.3(d) (definition of "Conduct or Sponsor"). Dissemination does not include distribution intended to be limited to government employees or agency contractors or grantees; intra- or inter-agency use or sharing of government information; and responses to request 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, archival records, public filings, subpoenas or adjudicative processes.
- 6.9 **Influential.** 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.
- 6.10 **Reproducibility.** 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 shall provide 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

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supporting data using identical methods would generate similar analytic results, subject to an acceptable degree of imprecision or error.

- 6.11 **Transparent.** For the purpose of these guidelines, transparency refers to a clear description of the methods, data sources, assumptions, outcomes, and related information that allows a data user to understand how an information product was designed and produced.

7.0 OVERVIEW OF BEP INFORMATION DISSEMINATION AND QUALITY ASSURANCE

Depending upon their specific statutes and missions and the nature of the information they disseminate to the public, BEP utilizes a variety of quality assurance methods and procedures. These methods and procedures are designed to maximize the quality of BEP information, including the objectivity, utility, and integrity.

- 7.1 **Objectivity** involves a focus on ensuring that information is accurate, reliable, and unbiased and that information products are presented in an accurate, clear, complete, and unbiased manner. Objectivity is achieved by using reliable data sources and sound analytical techniques, and carefully reviewing information products prepared by qualified people using proven methods.
- 7.2 **Utility** involves the usefulness of the information to its intended users. Utility is achieved by staying informed of information needs and developing new data and information products where appropriate. On the basis of internal product reviews, consultation with users and in response to changing needs and emphasis, the content of ongoing information products is changed, new products are introduced, and some products are discontinued.
- 7.3 **Integrity** refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. To ensure information integrity, the BEP's Chief Information Officer (CIO) Directorate employs rigorous controls on information technology (IT) systems in accordance with regulatory requirements and sound security practices including, but not limited to, Federal Information System Modernization Act (FISMA) mandated controls and National Institute of Standards Technology (NIST) Federal Information Processing Standards (FIPS). These security procedures address all major information security components and apply to all BEP IT systems. Specifically, all operational IT systems must complete the mandatory security authorization and accreditation (SA&A) procedures to obtain an Authority to Operate (ATO) from the BEP CIO. This process includes incorporating the IT system into the Bureau continuous monitoring and authorization processes to ensure systems continue to operate within acceptable risk levels for maintaining the confidentiality, integrity, and availability of the information. BEP's CIO Directorate, Office Chiefs, and Managers are responsible for ensuring that BEP employees and contractors observe all security requirements, and receive appropriate security training.

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8.0 INFORMATION QUALITY GOALS

The development of information within BEP is undertaken within the context of two overarching goals: attention to information quality as a total; and continuing process, and commitment to making information available to the public, consistent with confidentiality concerns and resource availability. In addition, BEP reviews the quality (including the objectivity, utility, and integrity) of information before it is disseminated, and treats information quality as integral to every step of the development of information, including its creation, collection, maintenance, and dissemination. The quality assurance processes that are used to ensure the quality are described below.

8.1 BEP’s analytical, statistical, and other information product publications

BEP’s analytical, statistical, and other information product publications are peer reviewed by the responsible organization within BEP to ensure that they remain relevant, timely, and address current information needs. Office Chiefs and Managers are accountable for the decision whether and how to employ peer review in particular instances and, if so, its character, scope, and timing. These decisions are made consistent with program goals and priorities, resource constraints, and statutory or court-ordered deadlines. BEP makes the information it disseminates and the methods used to produce this information as transparent as possible so that the data analysis and results, in principle, are reproducible by qualified individuals. Some statistical publications are based on publicly available data, and the identification of the computer programs used to produce the statistics can be made available on request; accordingly, information in those publications is fully reproducible by the public. However, some estimates and projections included in BEP information products are not directly reproducible. Others may not be directly reproducible because of the complexity and detail of the methods and data. In those cases, greater emphasis is placed on periodic review and on documentation of methods, assumptions, data sources and related information. Information products that are deemed to have a greater impact on public policies are subject to more extensive internal review.

8.2 Use of reliable data sources

Information products disseminated by BEP are based on reliable, accurate data validated by a BEP subject matter expert (SME). As appropriate for supporting the reporting requirements, data employed in the preparation of information products is compiled using statistically sound procedures implemented by qualified professional staff. When analysis requires using samples from administrative data files, BEP utilizes statistically acceptable methods to design and select samples. These data samples are designed and compiled by staff knowledgeable about the content, structure, and limitations of the administrative data files employed. When information products require administrative files linked to external data sources, BEP extracts and links data from external sources based on a thorough understanding of the relevant components of the data sources.

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8.3 Preparation of statistical estimates

As appropriate for supporting the reporting requirements, estimation and sampling procedures are prepared using statistically sound procedures designed by qualified professional staff. Samples are evaluated by SMEs to ensure that the samples are representative for supporting the reporting requirements by comparing estimates with comparable information from prior years and from other sources to ensure reasonableness and reliability. Computer programs for sampling from files and using data from external data files are also reviewed and tested by technical staff from the CIO Directorate. Data files incorporating external data sources are reviewed to ensure that extraction and linkage processes are implemented correctly.

As appropriate, data sources, sampling errors, and disclosure limitation methods are documented in publications either for the publication as a whole or for individual tables. Documentation in BEP publications shall contain information on data sources including definitions and specifications of variables. Report documentation also includes, where appropriate, information on sampling errors and a description of rules or techniques for avoiding disclosure of confidential information

8.4 Preparation of simulation models

When BEP uses simulation models, the models are based on BEP's best judgments of current and future behavioral relationships and methods of projecting key program outcomes. For all simulation models, implementation procedures are tested, and the models' performance are thoroughly evaluated. All simulation models are extensively tested and reviewed within BEP to verify that the computer programs that were developed to implement models conform to the stated objectives. As appropriate, historical simulations are developed to evaluate the success of a model in producing reasonable projections. Models are periodically updated to reflect input from internal and external reviews and research findings on behavioral relationships.

8.5 Preparation of analytical reports and policy studies

Analytical reports are prepared by subject specialists using appropriate statistical and analytic methods and who are knowledgeable about the data sources and models being used. A variety of analytical techniques ranging from simple tabulations and descriptive summary statistics to multivariate statistical methods and econometric models are used to prepare reports. BEP personnel preparing analytical reports and studies are knowledgeable in the use of relevant data files, external data sources, and projections from simulation models.

Analytical techniques are reviewed by associated SMEs to ensure that they are appropriate for the data and the analysis to which they are applied. Qualified personnel reviews analytical reports and policy studies to ensure that the analysis is valid, complete, unbiased, objective, and relevant. When analyses are based on

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projections from simulation models, the assumptions used to produce the projections are identified as well as the rationale for the assumptions used and the impact of using alternative assumptions.

8.6 Editorial review for accuracy and clarity of information in publications

All information products are edited and proofread before release to ensure clarity and coherence. Text may be edited to ensure that the report is easy to read and grammatically correct, thoughts and arguments flow logically, and information is worded concisely and lucidly. Tables and charts may be edited to ensure that they clearly and accurately illustrate and support points made in the text and include concise and descriptive titles. Tables and charts are reviewed to verify they indicate the proper unit of measure for data being examined, internal labels (column headings, row stubs, and panel headings), and accurately describe the information. All changes made during the editing process are checked by a proofreader and reviewed and approved by the author prior to publication.

9.0 PROCEDURE TO SEEK AND OBTAIN CORRECTION OF INFORMATION

9.1 REQUEST

Individual seeking correction of information shall submit a request to BEP's CIO Directorate, Office of Critical Infrastructure and IT Security (OCIITS). A request to seek and obtain correction of information should:

- Identify the information and proposed correction or remedy, if possible;
- Describe in detail the manner the information was disseminated 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 OMB, Treasury, and/or OMB Guidelines;
- State how the individual was affected and how correction would benefit her/him; and
- Provide supporting documentary evidence, such as comparable data or research results on the same topic, if possible to help in the review of the request.

Individuals shall submit the request to OCIITS by calling the BEP Service Desk at (202) 874-3010 where a service representative will gather the information indicated above. A reference number will be provided to the requestor that can be used to identify the associated response from the published information on the BEP and Treasury websites.

9.2 TIME TO RESPOND TO A REQUEST

The OCIITS will coordinate requests with the BEP program office that generated the information in question and prepare the associated final response to the individual. OCIITS will publish the response to a request for correction of information within 60 calendar days of receipt. If the request requires more than 60 calendar days to

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resolve, a notification with the reference number provided will be published indicating the reason for the additional time, and an estimated decision date.

9.3 STANDARD OF REVIEW AND BEP RESPONSE

In making determinations of whether to correct information, OCIITS reserves the right to reject requests and will provide the reason or justification for the rejection and right to appeal. If a correction is warranted, OCIITS will publish the action(s) planned based on the nature, influence, and timeliness of the information, the significance of the correction on the use of the information, and the magnitude of the correction.

9.4 RIGHT TO APPEAL BEP DECISION-ADMINISTRATIVE APPEAL

If the request for correction of information is denied, OCIITS will include the information related to the right to file an administrative appeal and the filing process. Appeals must be submitted to the Director of BEP within 45 calendar days of receipt of the denial letter. The Director will respond to appeals within 60 calendar days of receipt. If the Director needs more than 60 calendar days to process the appeal, a notice will be published that includes the reason for delay, and an estimated decision date.

Administrative appeals shall be submitted to the Director by calling the BEP Service Desk at (202) 874-3010 and providing the response reference number and indicating that you are requesting an administrative appeal.

9.5 PERSONALLY IDENTIFIABLE INFORMATION

BEP respects the privacy of the individuals requesting correction of information, and will employ safeguards to prevent the misuse of personally identifiable information stored in BEP's systems and networks. BEP will only utilize the personally identifiable information provided in the request to respond to the individual, and will only disclose the information if required by federal law or regulation (e.g., Treasury, OMB, Congressional Office, or the Department of Justice).

10.0 REPORTING REQUIREMENTS

OCIITS maintains the requests for correction of information and records related hereto and the statistics necessary for the mandatory annual reports required by Treasury and OMB.

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11.0 OFFICE OF PRIMARY RESPONSIBILITY

Office of Critical Infrastructure and Information Technology Security

<electronically approved>

Leonard R. Olijar

Director