



Federal Housing Finance Agency's Information Quality Guidelines

Background

On September 28, 2001, the Office of Management and Budget (OMB) published guidelines in the *Federal Register* ([66 FR 49718](#)) requiring federal agencies to develop procedures for reviewing and substantiating the quality of their information before it is disseminated to the public. OMB's quality guidelines for dissemination of information to the public were issued under Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554) and were revised and reissued on February 22, 2002 ([67 FR 8459](#)). The guidelines require that each agency create a mechanism by which affected persons may seek, and obtain where appropriate, correction of information disseminated by the agency that does not comply with the agency's or OMB's guidelines. Starting in January 2004, agencies are required to submit an annual report to OMB detailing the number, nature, and resolution of any requests for a Section 515 correction. This document fulfills FHFA's obligation to issue guidelines for ensuring the quality, objectivity, utility, and integrity of information that FHFA disseminates to the public.

FHFA's Information Quality Guidelines are based on OMB's guidance; are designed to ensure that FHFA disseminates quality information as defined by OMB; and are consistent with FHFA's policies and procedures. The guidelines also provide a standard process for submitting a complaint concerning, or seeking corrections to, information disseminated by FHFA.

Scope

These guidelines apply to information that FHFA disseminates to the public, including information disseminated via our website. FHFA provides information, including economic and statistical reports, research and staff studies, educational brochures, booklets, and pamphlets to a broad spectrum of individuals and organizations including the public. FHFA is committed to following the suggested OMB guidelines and agrees with the underlying principles that the guidelines apply to a wide variety of government information dissemination activities ranging in importance and scope; that the guidelines are generic enough to fit all media whether printed, electronic or other form; and that they have the flexibility for FHFA to incorporate any special data quality requirements for specific types of publications. Clearly, the more significant the information, the higher the quality standards to which it should be held, e.g., influential scientific, financial or statistical information. These guidelines do not cover "distributions of information that are 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." These guidelines do not apply to correspondence with individuals or persons, press releases, archival records, public filings, subpoenas, or adjudicative processes.

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FHFA has created the following guidelines to promulgate its quality standards and formalize its correction mechanism. FHFA will continue to disseminate information that meets the Agency's standards as confirmed by its internal review and approval processes. FHFA is committed to integrating the principle of information quality into every step of its development of information including its creation, collection, maintenance and dissemination. The policies and procedures that FHFA currently has in place ensure, to the best of the Agency's ability, that the quality of the information and data released to the public is accurate and appropriate and meets FHFA's internal definitions of objectivity, utility, and integrity in accordance with the OMB guidelines. FHFA adopts the definition of quality from the OMB guidelines.

FHFA uses proven practices and standard review methods for ensuring quality and its key components: objectivity, utility, and integrity. The Agency recognizes the need to address these components of quality in unique ways. FHFA offices use the following guidelines to develop processes for reviewing and documenting the quality of information, focusing on utility, objectivity and integrity of information.

“Quality” is an encompassing term comprising (1) utility, (2) objectivity, and (3) integrity. Therefore, the guidelines sometimes refer to these statutory terms, collectively, as "quality."

- 1) **“Utility”** refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that FHFA disseminates to the public, FHFA considers the possible use of the information, not only from the perspective of the Agency, but also from the perspective of the public. As a result, when reproducibility and transparency of information are relevant for assessing the information's usefulness from the public's perspective, FHFA takes care to ensure that reproducibility and transparency have been addressed in its review of the information.
- 2) **“Objectivity”** involves two distinct elements - presentation and substance. Objective presentation includes whether disseminated information is being *presented* in an accurate, clear, complete and unbiased manner. Objectivity with regard to substance involves a focus on ensuring the information itself is accurate, reliable and unbiased. Objectivity also involves whether the information is presented within a proper context. Sometimes, in disseminating certain types of information to the public, other information will also be disseminated in order to ensure an accurate, clear, complete and unbiased presentation. FHFA identifies sources of disseminated information (to the extent possible, consistent with confidentiality protections) and in a financial or statistical context, the supporting data and models, so that the public can assess the objectivity of the sources. Sound statistical and research methods are employed to create disseminated information. Where appropriate, data is assessed for accuracy and accompanied by supporting data and transparent documentation, including error sources that may affect its quality.
- 3) **“Integrity”** refers to the security of information – protection of the information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. Information is protected from unauthorized access or revisions to

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prevent corruption or falsification of information. FHFA follows government-wide security requirements, legal and policy rules, regulations, directives and guidance governing the creation, maintenance and dissemination of information to the public.

Correction Requests

Any person affected by information disseminated by FHFA may file a complaint or a request to correct information that does not comply with FHFA's Information Quality Guidelines. Note that public comment on rulemaking must follow separate procedures.

A complaint or information correction request must be clearly labeled as a "complaint/request for correction of information under FHFA's Information Quality Guidelines," and provide all of the following information:

- Requestor's name, address, telephone number, and organizational affiliation, if any;
- A description of the specific information that is the subject of the request;
- A description of how the individual is affected by the information;
- An explanation of why the information does not comply with FHFA's Information Quality Guidelines, or why the information is incorrect; and
- Specific recommendations for correcting the information.

Persons filing a complaint or requesting an information correction have the burden of proof to demonstrate that the information does not comply with FHFA's Information Quality Guidelines, or that the information is incorrect, and that correction is necessary. Requests for FHFA to adopt or use information provided in conjunction with a correction request must demonstrate that the information complies with FHFA's information quality guidelines and demonstrate why the information is correct.

Complaints or information correction requests must be submitted in writing, and delivered by letter, email or fax using the following contact information:

Letter: Federal Housing Finance Agency (FHFA)
ATTN: Information Quality Program (OTIM/OCAC)
400 7th Street, S.W.
Washington, D.C. 20219

Email: InformationQuality@fhfa.gov

Fax: (202) 649-4674

An acknowledgement of a complaint or correction request will be sent within seven business days of receipt. FHFA will respond to complaints or requests for correction in writing within 60 calendar days. If FHFA needs additional time to adjudicate the issue, it will notify requestors in writing with a justification. If this occurs, FHFA may extend its response time for up to an additional 60 calendar days.

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Persons that disagree with FHFA's decision have 15 calendar days from the date of FHFA's decision, using the contact information above, to request that FHFA reconsider. Requests for reconsideration must include specific reasons and any additional supporting information or documentation that explains why FHFA should reconsider, modify or reverse its decision.

FHFA will respond in writing within 45 calendar days of the date of receipt of the request for reconsideration. FHFA's written decision will either uphold the initial decision or state that it warrants a correction and, if so, what action it will take. This decision will be final with no further right of appeal.

Any person concerned about the quality of information in a *Notice of Proposed Rulemaking*, a *Notice of Availability of a Draft Rule for Public Comment* or other similar Notice, must use the process for providing comments described on the FHFA website: [Open for Comment or Input | Federal Housing Finance Agency](#).

When FHFA issues a *Notice of Proposed Rulemaking* or a *Notice of Availability of a Draft Rule for Public Comment* or a similar Notice, the preamble to the proposed rule or draft rule typically describes the basis for the proposed or draft rule, which may include information from technical or research studies. The documents also typically include a summary of the analyses performed under Executive Order 12866: *Regulatory Planning and Review*, the *Regulatory Flexibility Act*, and other applicable laws. FHFA encourages the public to comment on the proposed or draft rule, including the quality of information, before the public comment period closes. FHFA will respond to comments made during the rulemaking process, which will be published in the Federal Register.

Information Quality Reporting

FHFA submits an annual report to OMB detailing the number, nature and disposition of complaints and information correction requests that were received during the preceding fiscal year.

Appendix A

FHFA also adopts the following definitions from OMB's guidelines:

- **“Affected persons”** are people who may benefit or be harmed by the disseminated information.
- **“Information”** means 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 FHFA 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 FHFA's views.
- **“Government information”** means information created, collected, processed, disseminated, or disposed of by or for the Federal Government.
- **“Information dissemination product”** means any book, paper, map, machine-readable material, audiovisual production, or other documentary material, regardless of physical form or characteristic, FHFA disseminates to the public. This definition includes any electronic document, CD-ROM, or web page.
- **“Dissemination”** means FHFA initiated or sponsored distribution of information to the public (see 5 C.F.R. 1320.3(d) - definition of "Conduct or Sponsor"). Dissemination does not include distribution limited to government employees or FHFA 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 law. 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 financial or statistical information," means that FHFA 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.
- **"Reproducibility"** means that the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. 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 analytical results, subject to an acceptable degree of imprecision or error.