



Tennessee Valley Authority

Information Quality Guidelines

1.0 PURPOSE

TVA strives to ensure that the information it disseminates to the public is of the highest quality, objectivity, utility, and integrity. To this same end, the Office of Management and Budget (OMB) has issued guidelines for ensuring and maximizing quality of information disseminated by all Federal Agencies in accordance with section 515 of Treasury and General Government Appropriations Act for Fiscal Year 2001, Pub. L. No. 106-554. The OMB Guidelines appear as 67 FR 8452, Feb. 22, 2002. This procedure follows the OMB Guidelines and establishes the standard of information quality applicable to information disseminated by TVA.

Persons affected by information disseminated by TVA are provided a means to seek and obtain corrections to information that they believe fails to meet the quality standards established herein. An administrative appeal process is provided to resolve disagreements between TVA and persons claiming to be affected by disseminated information.

These guidelines also establish annual reporting requirements for providing a summary of the number, nature, and resolution of corrections requested by affected persons.

2.0 SCOPE

All TVA organizations that produce information to be disseminated to the public are subject to these guidelines.

The guidelines are applicable to information that TVA disseminates on or after October 1, 2002, regardless of when the information was first disseminated, including the review of information to ensure quality before it is disseminated to the public. Previously released information products that do not meet these criteria are considered archived information and thus are not subject to these Guidelines.

3.0 INSTRUCTIONS

3.1 Review for Quality

3.1.1 Information of All Types

- A. Information, of all types, disseminated to the public in any medium shall be reviewed to ensure it is accurate, clear, complete, reliable and unbiased. The review shall also confirm that the information is presented in the proper context and is useful to the public.
- B. Information which is not deemed by TVA to be influential scientific, financial or statistical information as defined herein shall be reviewed by the group producing the information.

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- C. Following review, information shall be presented to TVA management for confirmation that TVA's expectations have been achieved.
- D. All approved information is prepared by TVA Communications or the organization responsible for publication. Prior to release, the author will confirm that the information has not been corrupted by the preparation process.
- E. Upon author's release, the information is disseminated.
- F. In cases where the TVA disseminates a study, analysis, or other information prior to the final agency action or information product, requests for correction will be considered prior to the final agency action or information product in those cases where the agency has determined that an earlier response would not unduly delay issuance of the agency action or information product and the complainant has shown a reasonable likelihood of suffering actual harm from TVA's dissemination if the complaint is not resolved prior to the final agency action or information product

3.1.2 Influential, Scientific, Financial or Statistical Information

- A. The level of objectivity for influential scientific, financial or statistical information will be considered acceptable if data and analytic results have been subjected to an approach outlined in the information owner's review procedure. Approaches in use at TVA include external independent peer review, internal peer review, internal formal verification of processes and internal procedures for quality control of collected data.
- B. The review of influential scientific, financial or statistical information shall confirm that the original and supporting data have been generated, and the analytic results have been developed, using sound statistical and research methods. Data and methods, based on commonly accepted scientific, financial, or statistical standards, shall be transparent (see definition) to facilitate reproducibility by qualified third parties.
- C. Where appropriate, data should have full, accurate, and transparent documentation.
- D. Influential scientific, financial or statistical information shall be subject to the process in §§ 3.1.1.C-E above.

3.1.3 Assuring Integrity of Disseminated Information

- A. Integrity refers to the security of information. Organizations responsible for providing information to the public in any form or manner shall ensure that information is protected from unauthorized access or revision.

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- B. Web based information is protected from corruption or falsification.
- C. Publication of information shall be managed to ensure that information is not intentionally or inadvertently compromised prior to release. The final version of information shall be reviewed and, when appropriate, confirmation of its objectivity will be documented prior to release to the public.

3.2 Processing Requests for Corrections from Affected Persons

- A. TVA Communications, through its internet home page, <http://www.tva.gov/infoquality>, shall provide instructions for persons who claim to be affected by information disseminated by TVA to seek and obtain, where appropriate, correction of such information in a timely manner. Valid claims must clearly demonstrate that TVA did not meet the quality standards set forth in this procedure. The process for requesting correction shall also be obtainable through voice request via TVA phone operators and through written requests to TVA's general corporate office mail address, 400 West Summit Hill Drive, Knoxville, Tennessee 37902. The request should clearly identify the disseminated information asserted to be incorrect.
- B. All requests for correction of disseminated information shall be documented and tracked in the TVA Communications Complaint Tracking system.
- C. Within 7 working days of receipt of the request for correction, TVA Communications shall issue a notification, by mail, email, or fax to the requesting person acknowledging receipt of the complaint and indicating an evaluation will be performed to determine the merit, if any, of the complaint.
- D. TVA Communications shall ensure that determinations are generally completed, and the requesting person notified, within 60 days of receipt of complaints. If circumstances warrant, TVA may extend this time. Circumstances which may warrant an extension of time include, but are not limited to, the need to review extensive documentation, diverse locations of materials needing review, or the need to consult with officials in diverse locations having a substantial interest in the request. If an extension of time is deemed warranted, the complainant will be notified by mail, fax or email and provided the reason for the extension and an estimated decision date.
- E. Information shall be corrected when, in TVA's judgment, doing so addresses the needs of TVA and its constituents without disrupting TVA processes. Corrections will only be made to the extent TVA concludes that a correction is appropriate based on the nature and timeliness of the information involved and the timeliness of the complaint, considering all the circumstances. In reaching this determination, TVA will consider when the information was disseminated, its current applicability to TVA processes, and the degree to which the information is currently relied on by TVA. TVA will not make corrections to information that has been superseded or is outdated.

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- F. If TVA determines that a correction is appropriate, the correction will be made within a reasonable period of time given the extent and nature of the correction required and in a manner consistent with the nature and extent of the complaint.
- G. A denied request may be appealed within 30 days after notification. Such appeals must be in writing and submitted to External Communications (via TVA's general corporate office mail address, 400 West Summit Hill Drive, Knoxville, Tennessee 37922) which will determine the merit of the request after consulting with the relevant organization and other interested parties as determined by the External Communication organization.
- H. The appeal review shall be performed by a person not involved in the original determination. Within 7 working days of receipt of the appeal, External Communications shall issue a notification by mail, email, or fax to the petitioner acknowledging receipt of the appeal and indicating an evaluation will be performed.
- I. TVA External Communications shall ensure that determinations are generally completed, and the petitioner notified, within 60 days of receipt of appeals. If circumstances warrant, TVA may extend this time. If an extension of time is warranted, the complainant will be notified by mail, email or fax and provided the reason for the extension and an estimated decision date.
- J. In the event the appeal is determined to have merit, the original review process and the process used to evaluate the original complaint shall be corrected to adequately reflect TVA's position for ensuring objectivity and usefulness of disseminated information. Corrections shall be made, as appropriate, based on the External Communication's determination within a reasonable period of time given the extent and nature of the correction required and in a manner consistent with the nature and extent of the complaint.

3.3 Reporting Complaints

- A. TVA Communications shall use the Complaint Tracking system as the basis of an annual report of complaints. The report shall identify each of the complaints submitted to TVA during the previous Fiscal Year along with a summary of the nature of each complaint and the actions taken to resolve the complaint, including any appeals and subsequent corrective action, if applicable.
- B. The annual report shall be submitted by the TVA Chief Information Officer (CIO) to the Director, Office of Management and Budget, no later than January 1, 2004, for FY 2004, and by January 1st of each subsequent year for succeeding fiscal years.
- C. TVA Communications, as part of its process for reviewing requests for corrections from affected persons, will track TVA's performance toward a goal of no valid complaints pertaining to its information products during each reporting year.

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3.4 Maintaining an Information Quality Website

- A. TVA shall maintain a website related to the Information Quality Guidelines. The website shall be accessible via TVA external homepage.
- B. The information quality site should include, at a minimum, access to the TVA's data quality guidelines and an easy-to-understand explanation of the agency's procedures regarding requests for correction (which shall include an explanation of how a person may file a request and, subsequently, an administrative appeal of the agency's response to the request).
- C. The information quality site may also contain other types of information, such as a description of significant corrections that the agency has made as a result of the correction procedures. TVA shall determine the content of this information page based on its mission, activities subject to the guidelines, and the expected level of interest by members of the public.

4.0 RECORDS

- A. Annual Report to the Director, Office of Management and Budget
- B. Completed Complaint file

5.0 DEFINITIONS

Quality – an encompassing term comprising utility, objectivity, and integrity. These four terms may be collectively referred to as “quality”.

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

Objectivity – relates to the presentation of information in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within the proper context.

Integrity – refers to the security of information, protecting it from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification.

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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 TVA 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 TVA's presentation makes it clear that what is being offered is someone's opinion rather than fact or TVA's views.

Information dissemination product– any books, 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.

Dissemination – 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 Federal Advisory Committee Act, or other similar law. This definition does not include distribution limited to correspondence with individuals or persons, archival records, public filings, subpoenas or adjudicative processes. This definition also does not include press releases unless they contain new substantive information not covered by a previous information dissemination subject to this procedure.

Influential – when used in the phrase influential scientific, financial, or statistical information, means that TVA 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. TVA's history of information dissemination provides guidance to issues of greatest concern or vulnerability to the agency. These issues should be considered influential for purposes of this guideline. Information is only influential if it is intended for dissemination to the public as defined above.

Reproducibility – means that 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 the agency applies the reproducibility test to specific types of original or supporting data, the associated guidelines shall provide relevant definitions of reproducibility. 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.

Peer reviewer – a person with the technical or other relevant expertise to judge the quality of government information and determine its usefulness as disseminated information.

Transparent – data and methods that are not obscure and are readily understood by a reasonable person with relevant, e.g. scientific, technical, financial, education and experience.