

August 2006

# INFORMATION QUALITY ACT

## Expanded Oversight and Clearer Guidance by the Office of Management and Budget Could Improve Agencies' Implementation of the Act



G A O

Accountability \* Integrity \* Reliability



Highlights of [GAO-06-765](#), a report to congressional requesters

## Why GAO Did This Study

The importance and widespread use of federal information makes its accuracy imperative. The Information Quality Act (IQA) required that the Office of Management and Budget (OMB) issue guidelines to ensure the quality of information disseminated by federal agencies by fiscal year 2003. GAO was asked to (1) assess OMB's role in helping agencies implement IQA; (2) identify the number, type, and source of IQA correction requests agencies received; and (3) examine if IQA has adversely affected agencies' overall operations and, in particular, rulemaking processes. In response, GAO interviewed OMB and agency officials and reviewed agency IQA guidelines, related documents, and Web sites.

## What GAO Recommends

To help ensure that agencies covered by IQA meet requirements, GAO recommends that OMB's Director take actions to (1) work with DHS to help ensure it fulfills IQA requirements and set a deadline for doing so; (2) identify other agencies without IQA guidelines and work with them to develop and implement IQA requirements; and (3) clarify guidance to agencies on improving the public's access to online IQA information. OMB said it would continue working with DHS to develop departmentwide guidelines and with other agencies to develop their guidelines. OMB would also work with agencies to improve the online dissemination of IQA information.  
[www.gao.gov/cgi-bin/getrpt?GAO-06-765](http://www.gao.gov/cgi-bin/getrpt?GAO-06-765).

To view the full product, including the scope and methodology, click on the link above. For more information, contact Brenda S. Farrell at (202) 512-6806 or [farrellb@gao.gov](mailto:farrellb@gao.gov).

# INFORMATION QUALITY ACT

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### What GAO Found

OMB issued governmentwide guidelines that were the basis for other agencies' own IQA guidelines and required agencies to post guidelines and other IQA information to their Web sites. It also reviewed draft guidelines and undertook other efforts. OMB officials said that OMB primarily concentrated on cabinet-level and regulatory agencies, and 14 of the 15 cabinet-level agencies have guidelines. The Department of Homeland Security (DHS) does not have department-level guidelines covering its 22 component agencies. Also, although the Environmental Protection Agency and 4 other independent agencies posted IQA guidelines and other information to their Web sites, 44 of 86 additional independent agencies that GAO examined have not posted their guidelines and may not have them in place. As a result, users of information from these agencies may not know whether agencies have guidelines or know how to request correction of agency information. OMB also has not clarified guidance to agencies about posting IQA-related information, including guidelines, to make that information more accessible. Of the 19 cabinet and independent agencies with guidelines, 4 had "information quality" links on their home pages, but others' IQA information online was difficult to locate.

From fiscal years 2003 to 2004, three agencies shifted to using IQA to address substantive requests—those dealing with the underlying scientific, environmental, or other complex information—which declined from 42 to 38. In fiscal year 2003, the Federal Emergency Management Agency and two other agencies used IQA to address flood insurance rate maps, Web site addresses, photo captions, and other simple or administrative matters. But, in fiscal year 2004, these agencies changed their classification of these requests from being IQA requests and instead processed them using other correction mechanisms. As a result, the total number of all IQA requests dropped from over 24,000 in fiscal year 2003 to 62 in fiscal year 2004. Also, of the 80 substantive requests that agencies received during the 2-year period—over 50 percent of which came from businesses, trade groups, or other profit-oriented organizations—almost half (39) of the initial agency decisions of these 80 were appealed, with 8 appeals resulting in changes.

The impact of IQA on agencies' operations could not be determined because neither agencies nor OMB have mechanisms to determine the costs or impacts of IQA on agency operations. However, GAO analysis of requests shows that agencies can take from a month to more than 2 years to resolve IQA requests on substantive matters. According to agency IQA officials, IQA duties were added into existing staff responsibilities and administering IQA requests has not been overly burdensome nor has it adversely affected agencies' operations, although there are no supporting data. But evidence suggests that certain program staff or units addressing IQA requests have seen their workloads increase without a related increase in resources. As for rulemaking, agencies addressed 16 correction requests related to rulemaking under the Administrative Procedure Act, not IQA.

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**Abbreviations**

DHS	Department of Homeland Security
DOT	Department of Transportation
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
HHS	Department of Health and Human Services
IQA	Information Quality Act
NARA	National Archives and Records Administration
OIRA	Office of Information and Regulatory Affairs
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration

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United States Government Accountability Office  
Washington, D.C. 20548

August 23, 2006

The Honorable Henry A. Waxman  
Ranking Minority Member  
Committee on Government Reform  
House of Representatives

The Honorable Bart Gordon  
Ranking Minority Member  
Committee on Science  
House of Representatives

Federal agencies publicly disseminate a wide range of information that is critical to government, business, and individuals. For example, the open and efficient exchange of scientific and technical government information, subject to applicable national security controls and the proprietary rights of others, fosters excellence in scientific research and effective use of federal research and development funds. Given the widespread use of federal information by the public and private sectors, it is important that this information be accurate.

The Information Quality Act (IQA)—section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001—required the Office of Management and Budget (OMB) to issue governmentwide guidelines to “ensure and maximize the quality, objectivity, utility, and integrity of information, including statistical information,” disseminated to the public.<sup>1</sup> In addition, it required agencies to issue their own guidelines, set up administrative mechanisms to allow affected parties to seek the correction of information they considered erroneous, and report periodically to OMB information about IQA complaints (requests to correct agency information) and how the agencies addressed them.

In light of questions you raised about IQA information that OMB provided to Congress in its April 2004 report, you requested that we examine the

<sup>1</sup> Consolidated Appropriations – Fiscal Year 2001, Pub. L. No. 106-554, § 515, 114 Stat. 2763A-153 to 2763A-154 (2000) (44 U.S.C. § 3516 note). The law is also referred to as the Data Quality Act.

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implementation of IQA.<sup>2</sup> As agreed with your offices, we (1) assessed OMB's role in helping agencies to implement IQA; (2) identified the number, type, and source of correction requests agencies received under IQA for fiscal years 2003 and 2004; and (3) examined whether the implementation of IQA has adversely affected agencies' overall operations in general and the rulemaking process in particular.<sup>3</sup>

To address the first objective, we reviewed documents, including IQA guidelines; contacted and interviewed OMB staff and officials as well as IQA and other knowledgeable officials from 12 cabinet-level agencies and 5 independent agencies; and examined these agencies' Web sites.<sup>4</sup> In addition, we reviewed the Web sites of the other cabinet agencies and 86 other independent agencies. To address the second objective, we reviewed OMB and agency documents covering the 2-year period, including annual reports submitted to OMB by agencies that received correction requests, and interviewed OMB and agency officials from those agencies. To address the third objective, we reviewed relevant OMB and agency documents, including IQA guidelines and agencies' annual reports to OMB, examined requests and appeals to correct agency information, studied OMB's and agencies' Web sites, and interviewed OMB and agency IQA and other knowledgeable officials. We determined that OMB and agency IQA data were sufficiently reliable for the purposes of this review and use in this report. Although agencies have other mechanisms to correct information, we evaluated only information related to the IQA correction mechanism. Appendix I provides additional details on our scope and methodology. We conducted our work in Washington, D.C., from March 2005 through July 2006 in accordance with generally accepted government auditing standards.

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<sup>2</sup> Office of Management and Budget, Office of Information and Regulatory Affairs, *Information Quality: A Report to Congress, Fiscal Year 2003* (Washington D.C.: Apr. 30, 2004).

<sup>3</sup> We use the term agencies to refer to executive branch cabinet departments and independent agencies covered by the Paperwork Reduction Act—the agencies also covered by IQA.

<sup>4</sup> The cabinet-level agencies we examined are the Departments of Agriculture, Commerce, Defense, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, Transportation, and the Treasury. In addition, we interviewed officials at the following independent agencies: the Environmental Protection Agency, the Consumer Product Safety Commission, Federal Deposit Insurance Corporation, National Aeronautics and Space Administration, and Nuclear Regulatory Commission.

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## Results in Brief

As required by IQA, OMB issued guidelines for agencies, which agencies used as the basis for developing their own IQA guidelines. OMB also assisted agencies as they developed their IQA guidelines, reviewed their draft guidelines, and established the mechanism agencies are to use annually to report IQA information to OMB. OMB required agencies to post IQA guidelines on their Web sites. In implementing IQA, according to OMB officials, OMB primarily concentrated its efforts, including outreach, on the cabinet-level and regulatory agencies. Fourteen of 15 cabinet agencies as well as the Environmental Protection Agency (EPA) have IQA guidelines in place.

On the other hand, the Department of Homeland Security (DHS) does not have departmentwide IQA guidelines, and four of its component agencies—including the Federal Emergency Management Agency (FEMA)—have IQA guidelines corresponding to their previous departments or guidelines that have not been updated by DHS. In addition, we did not find IQA guidelines, references to IQA, or other IQA information on about half (44) of the Web sites of 91 independent agencies we reviewed. Moreover, even when IQA information was posted on agencies' Web sites, finding that information on those Web sites was difficult. Of the 19 cabinet and regulatory agencies with IQA guidelines that we examined, only the Departments of Agriculture, Commerce, Energy, and the Interior provided a direct IQA "information quality" link on their home pages that would likely be easy for the public to find and use. Accessing IQA information on the Web sites of the other 15 agencies we examined was not easy because these agencies provided no discernable link to IQA information; required multiple searches using various terms related to IQA; or provided access to their guidelines and other information through "contact us," "policies," or other less-than-obvious links, such as "resources." OMB's guidance is not clear about how agencies should provide access to online IQA information. Without clear and easily accessible information about IQA, users of information from many of these agencies may not know whether agencies have guidelines or how to request correction of agency information.

From fiscal year 2003 to fiscal year 2004, three agencies shifted to using IQA almost exclusively to address substantive requests—those dealing with the underlying scientific, environmental, or other complex information—which declined from 42 to 38. In fiscal year 2003, FEMA and two agencies within the Departments of Labor and Transportation used IQA to address flood insurance rate maps, Web site addresses, photo

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captions, and other simple or administrative matters.<sup>5</sup> However, in fiscal year 2004, these agencies changed their classification of these requests from IQA requests and instead processed them using other correction mechanisms. As a result, the total number of all IQA requests dropped from over 24,000 in fiscal year 2003 to 62 in fiscal year 2004. Moreover, of the 80 substantive requests that agencies received during the 2-year period, over 50 percent came from businesses, trade groups, or other profit-oriented organizations. Almost half (39) of the initial agency decisions of these 80 requests were appealed, and 8 appeals resulted in information changes.

The impact of IQA on agencies' operations could not be determined because agencies and OMB do not have mechanisms in place to track implementing IQA. Agencies and OMB do not capture IQA workloads or cost data, nor do they track the impact of IQA requests or resulting information changes. Our analysis of requests found that agencies can take from more than 1 month to more than 2 years and require the involvement of a wide variety of staff to resolve IQA correction requests, particularly if the requests center on substantive matters—for example, endangered species or public health. Agency IQA officials said that they incorporated IQA duties into existing staff responsibilities, and administering IQA correction requests has not been overly burdensome and has not adversely affected agencies' operations, although they do not have data to support their views. However, evidence suggests that certain program staff or units addressing IQA requests have seen their workloads increase without a related increase in resources. With respect to IQA requests related to rulemaking, five agencies reported having received 16 such requests in fiscal years 2003 and 2004; they addressed 10 of the 16 through the notice and comment process of the Administrative Procedure Act rather than IQA, rejected 2, and were developing or pending responses to the remaining ones as of the end of March 2006. It should be recognized that IQA correction requests could affect rulemaking outside of the formal rulemaking process. For example, IQA correction requests that are filed before an agency's formal rulemaking process begins could affect when or if an agency initiates a rulemaking.

To help ensure that all agencies covered by the IQA fulfill their IQA requirements, including implementing IQA guidelines and posting information on how to file information correction requests, and promote

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<sup>5</sup> The agencies or OMB designates IQA requests to be "simple or administrative."



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easier public access to IQA information on agency Web sites, we recommend that the Director of OMB (1) work with DHS to help ensure it fulfills IQA requirements and set a deadline for doing so, (2) identify other agencies that do not have IQA guidelines and work with them to develop and implement such guidelines, and (3) clarify guidance to agencies on improving the public's access to online IQA information.

In written comments on a draft of this report, the Acting Administrator of OMB's Office of Information and Regulatory Affairs (OIRA) stated that OMB fully supports our recommendation that DHS develop IQA guidelines and that OMB would continue to work with DHS to that end. The Acting Administrator also stated that OMB would continue working with other agencies as they develop and implement information quality measures. He added that OMB shares GAO's interest in improving public access to IQA information on agencies' Web sites and would continue to work with agencies to improve their dissemination of IQA information in a manner consistent with OMB policies. OIRA provided separate technical corrections and suggestions to this draft, which we have incorporated as appropriate. The written comments are reprinted in appendix IV.

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## Background

IQA consists of two major elements. The first element of IQA required OMB by the end of fiscal year 2001 to develop and issue guidelines that provide policy and procedure guidance for federal agencies to use for "ensuring and maximizing quality, objectivity, utility, and integrity of information, including statistical information," that they disseminate. The second element required federal agencies covered by the Paperwork Reduction Act to develop IQA guidelines by the end of fiscal year 2002, establish administrative mechanisms allowing "affected persons" to seek and obtain correction of information maintained and disseminated by the agencies, as well as periodically report to the Director of OMB about the number and nature of IQA complaints and how they handled such complaints.<sup>6</sup>

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<sup>6</sup> Agencies subject to the Paperwork Reduction Act are executive departments; military departments; independent regulatory agencies; government corporations; government-controlled corporations; or other establishments in the executive branch, including the Executive Office of the President. It specifically excludes the Federal Election Commission; GAO; and federal government-owned contractor-operated facilities, including laboratories engaged in national defense research and production activities, as well as District of Columbia and territorial governments. 44 U.S.C. § 3502(1).

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IQA builds on previous federal efforts to improve the quality of information, including OMB Circular A-130 and the Paperwork Reduction Act of 1980, as amended. For example, two of the purposes of the Paperwork Reduction Act were to “improve quality and use of federal information ... and provide for the dissemination of public information ... in a manner that promotes the utility of the information to the public and makes effective use of information technology.” IQA requires, among other things, that executive branch agencies manage their information resources to “improve the integrity, quality, and utility of information to all users within and outside an agency.”<sup>7, 8</sup>

OIRA, which develops and oversees the implementation of governmentwide policies in the areas of information technology, privacy, and statistics, had responsibility for developing the governmentwide IQA guidelines and helping agencies to meet the act’s requirement that they develop their own guidelines. In an October 2002 memorandum describing the implementation of IQA guidelines, OIRA’s then administrator stated he considered the IQA guidelines a continuation of the executive branch’s decades-long focus on improving the quality of information federal agencies collect and disseminate. The memorandum added that agencies’ implementation “of the Information Quality Law represented the first time that the executive branch has developed a governmentwide set of information quality guidelines, including agency-specific guidelines tailored to each agency’s unique programs and information.” Agencies’ guidelines, which were to follow OMB’s model, were to include administrative mechanisms that allow “affected parties”—as defined by the agencies—to request correction of information that they did not consider correct.

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<sup>7</sup> 44 U.S.C. § 3506(b)(1)(C).

<sup>8</sup> No hearings or debates were held or committee reports filed before IQA was enacted as part of the Treasury and General Government Appropriations Act for Fiscal Year 2001.

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## OMB Took Steps to Implement IQA, but IQA Guidelines and Information for Many Agencies Are Not Available or Easily Accessible

OMB set up a framework for federal agencies to follow in implementing IQA, including providing assistance and direction to agencies in developing agency IQA guidelines and requiring them to post IQA information on their Web sites. However, we were not able to locate any IQA information on about half of the independent agencies' Web sites that we examined, nor could we find *Federal Register* notices about IQA guidelines for them. According to OMB officials and OIRA's then administrator, OIRA concentrated its communication and other outreach efforts on cabinet-level and regulatory agencies. In written comments on a draft of our report, OIRA noted that in working with agencies to develop and implement information quality measures, it will consider the needed resources for and the potential benefits of such measures. Further, in a number of cases where IQA information was posted online, locating the information was difficult. Agency IQA officials with whom we met noted that their IQA correction mechanism is a formal process and one of a number of correction mechanisms available to the public for having information errors corrected.

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## OMB's OIRA Set Up Framework for IQA Implementation

OMB set up a framework for agencies to follow in implementing IQA and provided assistance and direction to agencies in developing their guidelines. As required by IQA, OMB issued the basic set of governmentwide IQA guidelines that agencies used as the basis for developing their own guidelines. These guidelines explained what agencies were to do to help ensure the development and public dissemination of quality information. In developing these guidelines, OIRA espoused three underlying principles that agencies were to reflect in their guidelines:

- The guidelines are to apply to a wide variety of government information dissemination activities that may vary in importance and scope.
- Agencies are to meet basic information quality standards, noting that the more important the information, "the higher the quality standards to which it should be held," but that "agencies should weigh the costs ... and the benefits of higher information quality in the development of information."
- Agencies are to apply the guidelines in "a common-sense and workable manner," meaning that agency guidelines are not to "impose unnecessary administrative burdens that would inhibit the agencies from continuing to take advantage of the Internet and other

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technologies to disseminate information that can be of great benefit and value to the public.”

The guidelines, in elaborating on this last principle, explained that “OMB encourages agencies to incorporate the standards and procedures required by these guidelines into their existing ... administrative practices rather than create new and potentially duplicative or contradictory processes.” The guidelines also noted that they were written to provide agencies with flexibility as they developed their own guidelines.

Moreover, the guidelines defined four key concepts related to the dissemination of information—quality, objectivity, utility, and integrity—and described how quality was the outcome of the other three components. These guidelines further explained that agencies were to mirror these principles and actions in establishing their own guidelines and to include an administrative mechanism that data users who find mistakes in any agency’s public data or information can use to petition for correction. This mechanism was to include an appeals process, which allows a petitioner to request that an agency reconsider its initial decision about the correction request. The guidelines’ wording about the administrative correction mechanism allowed agencies to avoid duplicating the public comment process required by the rulemaking procedures under the Administrative Procedure Act, in which interested persons are given the opportunity to comment on proposed rules.

In addition to writing the governmentwide IQA guidelines, OIRA took other steps to help agencies implement the principles and standards of IQA. As part of helping agencies to develop their guidelines, OIRA offered them assistance, including outreach to agencies such as conducting workshops on drafting guidelines, and reviewed their guidelines. IQA officials from a number of agencies, including the Departments of Defense and Justice, told us they considered this assistance beneficial. OIRA officials also issued memorandums to clarify how agencies were to satisfy the law and otherwise implement IQA, including requiring agencies to post IQA guidelines and related information on their Web sites.<sup>9</sup> Further, OIRA put in place the mechanism for agencies to provide OMB with their annual IQA reports on their implementation of IQA, the number of IQA requests and

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<sup>9</sup> These memorandums are accessible by selecting the Information Policy, E-gov & IT option under Information and Regulatory Affairs on OMB’s Web site at <http://www.whitehouse.gov/omb/>.

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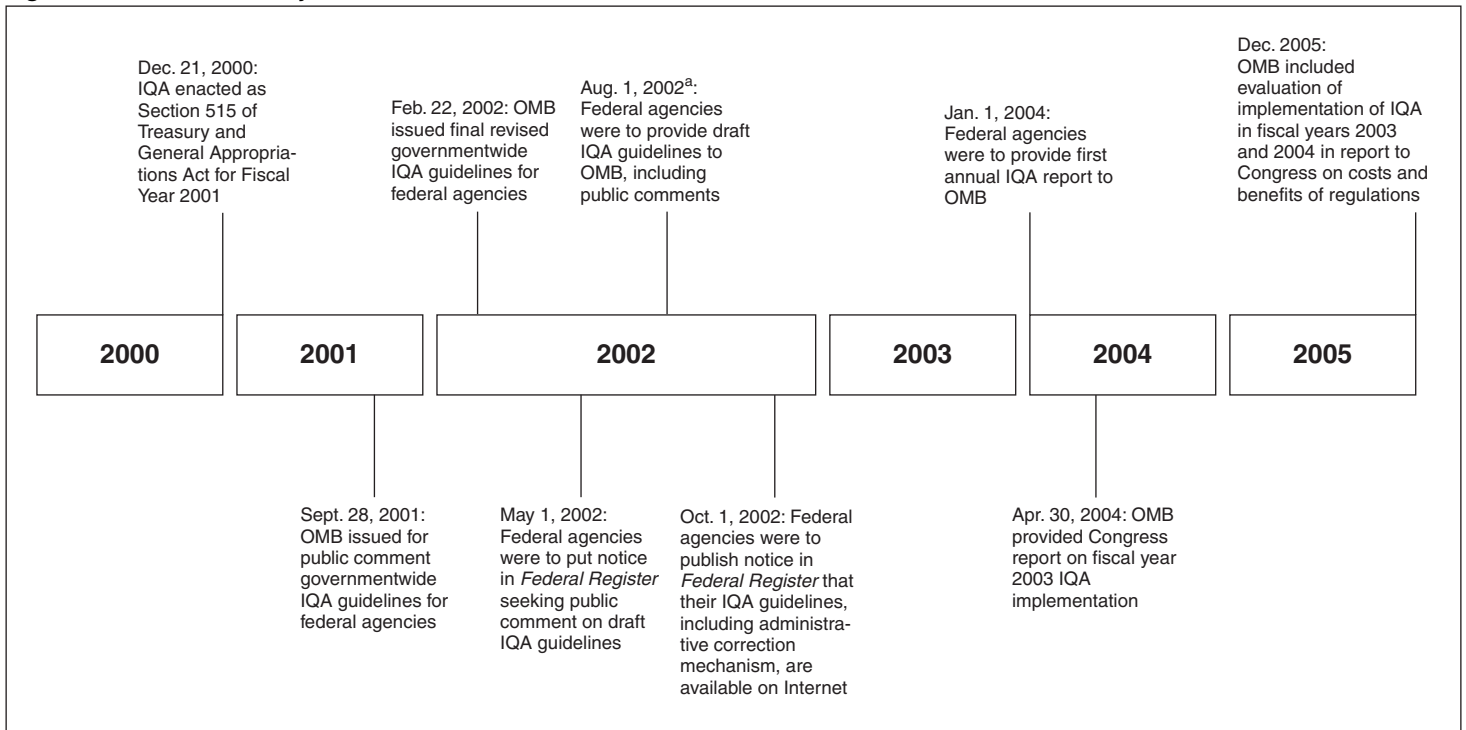
appeals, and their status. According to OIRA staff and officials and agency memorandums, OIRA monitored IQA correction requests received by agencies and assisted them in developing their responses. Agency officials told us that OMB's revisions consisted of comments that ranged from editorial to significant and primarily involved IQA requests pertaining to substantive issues. For example, agency officials and OMB staff explained that OMB at times asked for more detailed explanations, including references to other relevant information, in agency responses to correction requests. According to these officials, OMB's review did not cause changes that would have substantially changed the agencies' ultimate decision. We found no indication that OMB's involvement substantially changed agencies responses when we examined nine specific IQA requests from four agencies.

As described in figure 1, agencies covered by IQA were to have their guidelines and the correction and appeals mechanism in place by the start of fiscal year 2003 (October 1, 2002). The figure also shows that in April 2004, OMB reported to Congress in response to a mandate that OMB report on the first year—fiscal year 2003—of the implementation of the act. That report included information about the characteristics of the correction requests as well as the sources of the requests, and commented on a number of common perceptions and concerns about the act. OMB, of its own volition, in December 2005, updated this information and included it in a chapter in its report to Congress on the costs and benefits of federal regulations.<sup>10</sup> In this report, OMB provided information on the implementation of IQA in fiscal year 2004 and compared fiscal years 2003 and 2004 IQA information.

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<sup>10</sup> Office of Management and Budget, Office of Information and Regulatory Affairs, *Validating Regulatory Analysis: 2005 Report to Congress on the Costs and Benefits of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities* (Washington, D.C.: December 2005).

**Figure 1: Time Line of Major IQA Milestones**



Source: GAO analysis of OMB information.

Note: This time line excludes requirements and time frames related to peer review, which OMB was developing and implementing at the time of our review.

<sup>a</sup>The original deadline was July 1, 2002, but OMB extended it.

## OIRA Focused Its Efforts on Cabinet-Level and Regulatory Agencies

According to OMB and OIRA staff and officials and OIRA's then administrator, OIRA concentrated its efforts to implement IQA on cabinet-level and regulatory agencies. In addition to working with the cabinet agencies to create IQA guidelines, OIRA staff stated they also focused their attention on regulatory agencies and commissions, including EPA. OIRA did not clarify for many independent agencies—especially smaller, nonregulatory ones—whether the law applied to them or generally follow up with them to help them meet the act's provisions. By the fiscal year 2002 deadline, 14 of the 15 cabinet-level agencies had guidelines in place (see

table 1).<sup>11</sup> Further, following the flurry of activities to help agencies develop their IQA guidelines by October 1, 2002, OIRA shifted its emphasis away from helping agencies develop their IQA guidelines to helping agencies that already had guidelines to address IQA correction requests. According to OIRA staff, since November 2002 OIRA has not promulgated additional guidance regarding the development of IQA guidelines to agencies.

**Table 1: Cabinet-Level Agencies with IQA Guidelines**

**Agencies**

Department of Agriculture	Department of the Interior
Department of Commerce	Department of Justice
Department of Defense	Department of Labor
Department of Education	Department of State
Department of Energy	Department of Transportation
Department of Health and Human Services	Department of the Treasury
Department of Housing and Urban Development	Department of Veterans Affairs

Source: GAO analysis of agency and OMB information.

Only one cabinet-level agency, DHS, the newest and one of the largest federal agencies, has no department-level IQA guidelines covering its 22 agencies, which issue a wide array of information used by the public. Because DHS was not created until January 2003—after IQA was enacted and IQA deadlines had passed—OMB began working with DHS officials to develop department-level guidelines after the other cabinet-level and independent agencies had their guidelines in place, according to OMB’s April 2004 report to Congress.<sup>12</sup> As of March 2006, however, DHS did not have its IQA guidelines in place and officials did not have a deadline for establishing them. Also, while 5 DHS component agencies had IQA guidelines before they became part of DHS,<sup>13</sup> the guidelines of 4 of the 5

<sup>11</sup> OMB granted an extension to the Department of Defense (DOD) for implementing its guidelines because of the war in Iraq. DOD implemented its guidelines in February 2003.

<sup>12</sup> Office of Management and Budget, *Information Quality: A Report to Congress, Fiscal Year 2003*.

<sup>13</sup> These are the Coast Guard, Customs and Border Protection (previously Customs Service), FEMA, Federal Law Enforcement Training Center, and Secret Service.

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component agencies—the Coast Guard, Customs and Border Protection, FEMA, and Secret Service—are still linked to their previous parent departments or otherwise have not been updated by DHS. For example, the IQA guidelines for the Coast Guard, which was previously part of the Department of Transportation (DOT), instructed information users submitting IQA requests to file via DOT’s Docket Management System, the administrative mechanism that DOT directs the public to use to file correction requests. Additionally, FEMA has not updated its guidelines since becoming part of DHS. DHS officials told us that the component agencies may update their guidelines after DHS has its departmentwide guidelines in place. Until that occurs, it is unclear what appeals process the public would follow and how DHS agencies will make final decisions about IQA correction requests.

Moreover, when we checked the Web sites of 91 independent agencies, we did not find IQA guidelines posted on the Web sites of 44 of those agencies. (See app. II for the list of independent agencies and the status of their guidelines at the end of May 2006.) These 44 commissions, agencies, and other independent entities gave no indication of any IQA guidelines or IQA reports, nor any mention of IQA on their Web sites or on OMB’s Web site of agencies’ IQA guidelines. We also could not find these agencies’ *Federal Register* notices announcing the establishment of their IQA guidelines, although OMB required these notices. Also, OIRA staff did not have copies of the guidelines and said that they had focused their attention on cabinet agencies and regulatory agencies. These 44 agencies represented a broad spectrum of entities—including fact-finding agencies, such as the U.S. Civil Rights Commission; research organizations, such as the Smithsonian Institution; and others, such as the U.S. Trade and Development Agency—that produce a wide range of publicly disseminated information. In commenting on this report, the acting OIRA administrator noted that OIRA will take into account the resources that would be needed and the potential benefits that would be realized in working with agencies “to develop and implement information quality measures.”

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### Accessing Agencies’ Web Site IQA Information Is Difficult

Even when agencies posted IQA information on their Web sites as OMB required, such information was hard to access, making it difficult for information users to know whether agencies have IQA guidelines or how to request correction of agency information. As part of the governmentwide IQA guidelines, OIRA required agencies to post their draft agency-specific IQA guidelines online by September 30, 2002, and to inform the public about them and solicit comments. However, we found it difficult to locate



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IQA information on agency Web sites. In addition to the difficulties of trying to find whether the independent agencies' Web sites contained IQA guidelines, we had problems finding IQA guidelines on the Web sites of the 14 cabinet-level and 5 independent agencies that we knew had those guidelines. Of these 19 cabinet-level and independent agencies with IQA guidelines that we reviewed, only 4 agencies—the Departments of Agriculture, Commerce, Energy, and the Interior—provided a direct IQA “information quality” link on their home pages, which likely would be relatively easy for the public to use to access IQA information. In the case of the 15 other agencies, we found that accessing IQA information on their Web sites was difficult because these agencies provided no discernable link to IQA information on their home pages; provided access to their guidelines and other information through “contact us,” “policies,” or other less-than-obvious links, such as “resources”; or required multiple searches using various terms related to IQA, as was the case with the Department of Defense and the Department of State. Although OIRA directed agencies to post IQA information online, OIRA’s guidance is not specific about how agencies should provide access to online IQA information. Moreover, agency IQA officials told us that OMB did not provide guidance about where to place IQA information on their Web sites or what kind of access—or transparency—to provide. Agency IQA officials from a number of agencies stated that access to their Web-based IQA information was not “user-friendly” and said they were working to make IQA information more transparent and easily accessible.

OMB is aware of the need to improve the public’s access to IQA information. In its April 2004 report to Congress, OIRA acknowledged the need for agencies to improve the transparency of IQA information and recommended that agencies include on their public Web sites IQA correction requests, appeals, and agency responses to them, as well as the agencies’ annual IQA reports to OMB.<sup>14</sup> OMB and OIRA subsequently issued additional directives to facilitate the public’s ability to access government information and the process to request correction of erroneous public information. For example, in August 2004, responding to “inconsistent practices regarding the public availability of correspondence regarding information quality requests,” OIRA’s administrator issued a memorandum instructing each agency to post its IQA documents online by December 1, 2004.

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<sup>14</sup> Office of Management and Budget, *Information Quality: A Report to Congress, Fiscal Year 2003*.

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## From Fiscal Years 2003 to 2004, Three Agencies Reclassified Correction Requests to Concentrate on Substantive Matters

From fiscal year 2003 to fiscal year 2004, three agencies shifted to using IQA to address primarily substantive requests—those dealing with the underlying scientific, environmental, or other complex information—which declined from 42 to 38. The total number of all IQA requests dropped from over 24,000 in fiscal year 2003 to 62 in fiscal year 2004. The overwhelming cause for this decline was that in fiscal year 2004 FEMA no longer classified requests to correct flood insurance rate maps as IQA requests or addressed them through IQA. The decline in the number of IQA requests does not indicate that there was a corresponding decrease in agency workloads.

In fiscal year 2003, agencies reported having received over 24,600 IQA correction requests, with FEMA's 24,433 requests accounting for over 99 percent of the year's total. FEMA's requests were all related to flood insurance rate maps. Eighteen other agencies accounted for the balance of the year's requests (183), 54 of which resulted in changes in information, including clarifying language. In fiscal year 2004, FEMA, with OMB's approval, no longer classified flood insurance rate map correction as IQA requests. Instead, FEMA addressed flood insurance rate map correction requests by using a correction process it had implemented prior to the enactment of IQA. Largely as a result of this change and a similar change by two other agencies—the Department of Labor's Occupational Safety and Health Administration (OSHA) and DOT's Federal Motor Carrier Safety Administration—in fiscal year 2004, 15 agencies reported a total of 62 IQA correction requests to OMB. Of these, 26 requests resulted in changes.

As shown in table 2, from fiscal year 2003 to fiscal year 2004, the number of substantive requests declined in terms of their total numbers, decreasing from 42 in fiscal year 2003 to 38 in fiscal year 2004.

**Table 2: Distribution of Substantive IQA Requests by Category of Petitioner, Fiscal Years 2003 and 2004**

Source of request	Requests in fiscal year 2003		Requests in fiscal year 2004	
	Number	Percentage	Number	Percentage
Business, trade group, or other profit-oriented organization	22	52.4	22	57.9
Nonprofit or other advocacy organization	12	28.6	10	26.3
Private citizen	6	14.3	4	10.5
Government	2	4.8	2	5.3
<b>Total</b>	<b>42</b>	<b>100</b>	<b>38</b>	<b>100</b>

Source: GAO analysis of agency and OMB data.

As shown in table 2, during fiscal years 2003 and 2004, over half of the substantive IQA correction requests originated from businesses, trade groups, or other profit-oriented organizations, and over one-quarter were generated by nonprofit or other advocacy organizations. (For a list of these requesters, see app. III.) Substantive requests generated by individual citizens declined from about 1 in 7 of substantive requests to about 1 in 10.

Substantive requests in fiscal year 2004 represented a greater proportion of IQA correction requests than in fiscal year 2003, excluding FEMA flood insurance rate map correction requests. Out of 183 non-FEMA requests in fiscal year 2003, 42—or almost one-fourth—were substantive in nature. Addressing these substantive requests required considerably more time and staff resources than simple or administrative requests. OMB and agency officials considered the other 141 requests—over three-fourths—to be of a simple or administrative nature—for example, requests to correct errors in photo captions, personal information, or Internet addresses.<sup>15</sup> Agencies were able to quickly correct these simple or administrative requests—correcting 17 requests took 7 or fewer days from the date the agencies received them. In fiscal year 2004, of 62 total IQA requests, 38 requests—almost two-thirds—were considered to be substantive. Table 3 shows the 80 substantive requests for fiscal years 2003 and 2004 by category of petitioner, agency, and status of requests, as of May 2006.

<sup>15</sup> OMB and agency officials sometimes differed in whether they considered requests to be minor or significant; therefore, our analysis of the number of requests by type of request differed from OMB's.

**Table 3: Substantive Fiscal Year 2003 and 2004 IQA Requests by Category of Petitioner, Distribution by Agency, and Status as of May 2006**

Agency	Sources of requests				Fiscal year 2003 Total
	Business/trade organization	Nonprofit/advocacy organization	Citizen	Government	
Department of Agriculture <sup>c</sup>	2	2	1	0	5
Department of Commerce <sup>c</sup>	1	1	0	0	2
Department of Defense	0	1	0	0	1
Department of Education	0	1	0	0	1
Department of Energy	0	0	0	0	0
Department of Health and Human Services <sup>c</sup>	8	0	2	0	10
Department of Housing and Urban Development	0	0	0	0	0
Department of Homeland Security	0	0	0	0	0
Department of the Interior <sup>c</sup>	4	1	0	1	6
Department of Justice	0	1	0	0	1
Department of Labor	1	0	0	0	1
Department of State	0	0	0	0	0
Department of Transportation	1	0	1	0	2
Department of the Treasury	0	0	0	0	0
Department of Veterans Affairs	0	0	0	0	0
Access Board	0	0	0	0	0
Consumer Product Safety Commission	2	1	0	0	3
Commodities Futures Trading Commission	0	0	0	0	0
Environmental Protection Agency	3	3	1	1	8
Federal Communications Commission	0	0	0	0	0
Federal Deposit Insurance Corporation	0	0	0	0	0
National Archives and Records Administration	0	0	0	0	0
National Aeronautics and Space Administration	0	0	1	0	1
Office of Science and Technology Policy <sup>c</sup> / Executive Office of the President	0	1	0	0	1
<b>Total</b>	<b>22</b>	<b>12</b>	<b>6</b>	<b>2</b>	<b>42</b>

Sources of requests					Outcome of fiscal year 2003 and 2004 requests					
Business/trade organization	Nonprofit/advocacy organization	Citizen	Government	Fiscal year 2004 Total	2-year Total <sup>a</sup>	No change made <sup>a</sup>	Change from initial request <sup>b</sup>	Change from appeal <sup>b</sup>	Outcome pending	
0	1	0	0	1	6	5	0	0	1	
2	0	0	0	2	4	4	0	0	0	
0	1	1	0	2	3	0	0	0	3	
0	0	0	0	0	1	1	0	0	0	
0	0	0	0	0	0	0	0	0	0	
6	2	1	0	9	19	9	6	2	2	
0	0	0	0	0	0	0	0	0	0	
0	0	0	0	0	0	0	0	0	0	
3	1	1	1	6	12	9	0	1	2	
0	0	0	1	1	2	1	1	0	0	
0	0	0	0	0	1	0	0	1	0	
0	0	0	0	0	0	0	0	0	0	
0	0	1	0	1	3	1	0	1	1	
1	0	0	0	1	1	1	0	0	0	
0	0	0	0	0	0	0	0	0	0	
0	0	0	0	0	0	0	0	0	0	
1	1	0	0	2	5	3	1	1	0	
0	0	0	0	0	0	0	0	0	0	
9	3	0	0	12	20	11	7	1	1	
0	1	0	0	1	1	1	0	0	0	
0	0	0	0	0	0	0	0	0	0	
0	0	0	0	0	0	0	0	0	0	
0	0	0	0	0	1	1	0	0	0	
0	0	0	0	0	1	1	0	0	0	
<b>22</b>	<b>10</b>	<b>4</b>	<b>2</b>	<b>38</b>	<b>80</b>	<b>48</b>	<b>15</b>	<b>7</b>	<b>10</b>	

Source: GAO analysis of agency information.

<sup>a</sup>Includes three requests, each of which was filed with two agencies and are therefore counted twice.

<sup>b</sup>“Change” means either full or partial correction of information.

<sup>c</sup>Includes requests filed with another agency. App. III identifies these requests.

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One reason that substantive requests in fiscal year 2004 represented an increased percentage of total IQA correction requests compared with fiscal year 2003 is that in fiscal year 2004 some agencies decided to exclude simple or administrative errors from IQA correction mechanisms. Specifically, according to agency IQA documents and OMB's December 2005 report, in fiscal 2004, FEMA, the Department of Justice, the Federal Motor Carrier Safety Administration, and OSHA no longer classified and addressed most simple or administrative types of errors as IQA correction requests. As a result, the majority of the correction requests that remained to be processed through IQA were substantive requests.<sup>16</sup> For example, in fiscal year 2004, the Department of Health and Human Services' (HHS) National Institutes of Health received a request related to information about smokeless tobacco; EPA received a request challenging information related to the water conservation benefits of water utility billing systems of multifamily housing; and the Department of the Interior's Fish and Wildlife Service received a request that challenged information used to protect the Florida panther.

We also found that no one agency dominated or accounted for the majority of fiscal year 2004 requests. In fact, in fiscal year 2004 the distribution of requests was more broadly spread across agencies than in fiscal year 2003, with EPA and the National Archives and Records Administration (NARA) each reporting 12 correction requests, and HHS reporting 9 requests to OMB.

A few agencies did not experience a decrease in the total number of IQA requests because they did not shift simple requests away from IQA or otherwise change how they processed such requests during the 2-year period. For example, according to OMB and NARA IQA documents, NARA's IQA requests—8 in fiscal 2003 and 12 in fiscal 2004—continued to be simple in nature and came primarily from individuals in both years. For the same 2 years, EPA's 25 requests and HHS's 19 requests were nearly all substantive and mainly came from businesses or profit-oriented organizations as well as nonprofits or advocacy groups.

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<sup>16</sup> According to the report, the Departments of Labor, Justice, and Transportation as well as FEMA decided "to not treat simple correction requests not generated by the Act as correction requests in their FY04 annual report to OMB." Despite this statement, the Department of Justice's annual report describes five requests, including four that could be considered simple in nature.

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## Agencies Changed Simple Requests More Often Than Substantive Requests or Appeals during 2 Years

In fiscal years 2003 and 2004, the simpler and more administrative the initial request, the more likely an agency was to correct the information without appeal. For example, during the 2-year period, NARA corrected or clarified information for 16 of the 20 IQA correction requests it received, which were all considered to be simple in nature. Conversely, the more significant the correction request, the lower the likelihood of a change. HHS, for example, addressed 19 IQA requests that were substantive but changed information for only 5 based on the initial request or an appeal. Regardless of the complexity of the request, agency IQA documents showed that agencies addressed all requests filed during the 2-year period.

Substantial requests were less likely to result in an initial information change but more likely to be appealed than simple or administrative requests. Few petitioners appealed agency decisions regarding simple or administrative requests. None of 131 “simple or administrative” fiscal year 2003 IQA requests from the Departments of Transportation, Labor, and the Treasury and NARA was appealed. By comparison, of the 80 substantive requests over the 2-year period, petitioners appealed 39 (almost half) of the agencies’ decisions. Of the 39 requests that were appealed, 25 were denied and 8 appeals resulted in information changes.

Table 4 shows the outcome or status of the appeals filed during fiscal years 2003 and 2004, as of the end of March 2006.<sup>17</sup> Two of the 39 appeals still have outcomes pending after more than 2 years, demonstrating that although the number of appeals may be considered small, the impact on agency operations may be significant, depending on the complexity of the specific issue. For example, in table 4, the EPA appeal pending—filed by the U.S. Chamber of Commerce in April 2005—affects 16 EPA databases that deal with such issues as wastewater treatment and the bioaccumulation of organic chemicals. This case has been ongoing for over 2 years, and could have effects on assessments regarding human health risks, other environmental impacts, and cleanup decisions. Also listed in table 3 is another IQA appeal filed in October 2003 by a private individual. The initial request for correction was filed in January 2003 before the DOT’s Federal Aviation Administration (FAA) challenging the analytical basis for its “age 60 rule” that forces air carrier pilots out of service at age 60. FAA upheld its “age 60 rule” in September 2003, but the

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<sup>17</sup> Our analysis differed from OMB’s analysis in its December 2005 report because OMB provided a status of appeals at the end of fiscal year 2004, whereas our analysis was based on the final outcome, which in some cases occurred after fiscal year 2004.

complainant filed an appeal in October 2003 and filed additional amendments thereafter. The request was still pending at the time we completed our study, more than 3-½ years after the initial IQA request was made and almost 3 years after the appeal.

**Table 4: Status of 39 Appeals of Substantive Requests for Fiscal Years 2003 and 2004, as of March 31, 2006**

<b>Agency</b>	<b>Total appeals</b>	<b>No changes from appeals</b>	<b>Changes from appeals<sup>a</sup></b>	<b>Appeal withdrawn</b>	<b>Outcome pending</b>
Department of Agriculture	3	3	0	0	0
Department of Commerce	3	2	0	1	0
Department of Education	1	1	0	0	0
Department of Health and Human Services	12	9	2	1	0
Department of the Interior	4	3	1	0	0
Department of Justice	1	0	0	1	0
Department of Labor	1	0	1	0	0
Department of Transportation	2	0	1	0	1
Department of Veterans Affairs	1	0	1	0	0
Consumer Product Safety Commission	1	0	1	0	0
Environmental Protection Agency	9	6	1	1	1
Office of Science and Technology Policy/Executive Office of the President	1	1	0	0	0
<b>Total</b>	<b>39</b>	<b>25</b>	<b>8</b>	<b>4</b>	<b>2</b>

Source: GAO analysis of agency and OMB information.

<sup>a</sup>“Changes” means either full or partial correction of information.



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As for the source of appeals, businesses, trade groups, and other profit-oriented organizations filed more appeals than other types of organizations or individuals. Businesses and profit-oriented organizations accounted for 25 of the 39 appeals of IQA requests filed during fiscal years 2003 and 2004. Of these 25 appeals, 4 resulted in changes. Appeals from advocacy/nonprofit groups resulted in 1 change from 5 appeals. Appeals from private citizens resulted in 3 changes from 7 appeals. The most appeals—25, or almost two-thirds of them—were filed with EPA, HHS, and the Department of the Interior. Those agencies also received nearly two-thirds of the requests that were classified as substantive.

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## Impact of IQA on Agencies Could Not Be Determined

The impact of IQA on agencies could not be determined because agencies and OMB do not have mechanisms in place to track the effects of implementing IQA. Agencies and OMB do not capture IQA workloads or cost data, nor do they track the impact of IQA requests or resulting information changes. However, evidence indicates that in at least some cases, addressing IQA requests and appeals can take agencies 2 years or longer to resolve and requires a wide range of staff, particularly if IQA correction requests center on substantive matters.

More specifically, none of the agencies we visited had information about the actual workload, the number of staff days, or other costs, with one exception.<sup>18</sup> Agency IQA officials told us they do not collect such data. They explained that their agencies did not capture specific workload or cost data related to establishing IQA guidelines, nor do they track workload or cost data involved in responding to IQA requests or have mechanisms to measure any impact IQA information changes have on operations or the quality of information. Officials at two agencies—the National Aeronautics and Space Administration and the Department of the Interior’s Fish and Wildlife Service—considered developing systems to track IQA costs but did not. Fish and Wildlife Service officials told us they decided against implementing an IQA cost tracking system because of the declining number of requests they have received since fiscal years 2003 and 2004 and the high cost and administrative complexities of setting up such a system. Additionally, IQA officials told us that addressing IQA requests is considered to be part of their agencies’ day-to-day business, and because of the multifaceted nature of some requests, allocating time and resources to

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<sup>18</sup> The Department of Labor had information for one IQA-related cost—a contract for \$170,000 to set up a system to track the status of IQA requests.

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one specific issue or linking work exclusively to IQA requests would be difficult. For example, Fish and Wildlife Service officials stated that when agency biologists work on IQA requests, they are also frequently working on broad biological, environmental, and related issues that go beyond a given request and relate to other agency work, so it would be difficult to allocate the biologists' time among various codes. In their view, selecting a specific code would be somewhat arbitrary, and time or other codes would not necessarily accurately reflect the cross-cutting nature of the biologists' work. Moreover, according to agency officials and OMB staff, neither the agencies nor OMB have mechanisms in place to track the effects of implementing the law.

Agency IQA officials and OIRA staff and officials told us that administering IQA has not been overly burdensome and that it has not adversely affected agencies' overall operations to date. Agencies IQA officials told us they gave IQA responsibilities to various staff within their agencies—generally in offices already responsible for information-related issues—and that no staff are dedicated exclusively to administering IQA. For example, most agencies have folded responsibilities for IQA, including setting up guidelines, into the office of the chief information officer or their public affairs unit. In addition, although they track the status of IQA correction requests, they do not track changes resulting from IQA requests or appeals.

Although there is a lack of comprehensive IQA-related cost or resource data, evidence suggests that certain program staff or units involved in creating IQA guidelines, including the correction mechanism, and addressing IQA correction requests have seen their workloads increase without any corresponding increase in resources. For example, officials at the Fish and Wildlife Service, HHS's National Institutes of Health, the Department of Commerce's National Oceanic and Atmospheric Administration, and the Department of Defense's Army Corps of Engineers estimate the costs of addressing IQA requests are "many thousands of dollars" because of the number of high salary professional staff, such as biologists, toxicologists, engineers, and managers, who review and respond to substantive requests and appeals and the extensive time involved. According to agency IQA officials and OMB staff, agencies did not receive funds for IQA, and the act did not specify any funds for implementing IQA. Moreover, our analysis of IQA requests shows that agencies have taken from 1 month to more than 1 year to produce a final decision on substantive IQA requests and appeals, while 2 appeals made during fiscal years 2003 and 2004 are still ongoing after 2 years or longer. However, evidence does not exist showing the resources allotted to those appeals

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over the 2-year period in question. The following IQA requests illustrate the length of time it can take to address an IQA correction, regardless of the final outcome.

- On March 10, 2004, a group of trade associations and organizations primarily representing the residential and commercial properties sector submitted an IQA request to EPA challenging the accuracy of an EPA statement that water allocation (submetering) billing systems in apartment buildings and other multifamily housing did not encourage water conservation. This statement was in a *Federal Register* notice regarding the applicability of the Safe Drinking Water Act to submetered properties.<sup>19</sup> The group did not consider the statement to be correct regarding one type of allocation system in particular—Ratio Utility Billing Systems. According to EPA documents and officials, EPA's response to the request and subsequent appeal involved a number of EPA staff, including senior executives, scientists, and others in the Office of Water and other headquarters units. The appeal itself was reviewed by a three-member panel of senior executives. EPA took a total of almost 5 months (146 days) to respond to the initial correction request, well over the 90-day goal stated in EPA's IQA guidelines, and almost 11 months (323 days) more to decide on the appeal, over three times longer than the 90-day appeals goal in EPA's guidelines, according to our analysis of EPA IQA requests. The nearly 15-month total response time was not unusual compared to other EPA processing times for IQA requests. The lengthy response time was in part due to EPA waiting for the completion of a related study—under way at the time of the correction request—before making a final decision about revising its submetering policy. On September 28, 2005, EPA ultimately denied the appeal and did not change its statement, citing the results of the study as not showing that Ratio Utility Billing Systems encouraged water conservation.
- On May 4, 2004, a nonprofit organization representing public sector employees involved in the environment and an individual federal employee submitted an IQA request to the Fish and Wildlife Service about alleged errors in agency documents, including the *Multi-Species Recovery Plan* and the draft *Landscape Conservation Strategy*, which are intended to protect the endangered Florida panther. The request and subsequent appeal involved previously identified errors in peer-

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<sup>19</sup> See 42 U.S.C. § 300g and 68 Fed. Reg. 74233 (Dec. 23, 2003).

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reviewed research associated with the definition of panther habitat, as well as estimates of panther population and models used to determine strategies to help the panther species survive and recover in Florida. Fish and Wildlife Service staff who evaluated and responded to the initial request and to the appeal included senior executives, attorneys, field biologists, and other professional staff from a number of offices within headquarters, including the program offices, the Solicitor's Office, the External Affairs Office, and the Director's Office, as well as field offices in Vero Beach and Jacksonville, Florida, and the regional office in Atlanta. The administrative appeals panel for the correction request consisted of executives from Fish and Wildlife Service headquarters and its Northwest Regional Office and Interior's U.S. Geological Survey. Although the service responded to the initial request 2 months after its receipt, it took more than 7-½ months (over 230 calendar days) to respond to the appeal. While the initial response was consistent with the Service's 45-business day response time stated in the guidelines, the appeal took over 6 months more than the guideline's 15-business day appeal time frame, according to our analysis. The nearly 300-day total response time was not unusual compared to other Fish and Wildlife Service processing times for IQA requests. On March 16, 2005, the Fish and Wildlife Service suspended the draft conservation strategy for the panther, corrected other key documents, posted notices on the regional and Vero Beach agency field office Web sites about these actions, and revised and published for public comment the panther section of the agency's recovery plan.

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### Agencies Treated Most IQA Rulemaking-Related Requests as Comments to Proposed Rules

According to OMB staff and agency IQA officials, IQA correction requests have not adversely affected agency rulemaking procedures to date, partly because agencies handled most IQA requests related to rulemaking as public comments to proposed rules under the Administrative Procedure Act rather than as IQA requests. This approach, described in a number of agencies' IQA guidelines, including EPA's and the Department of Agriculture's, was followed to avoid duplicating the rulemaking comment process and diverting resources away from the rulemaking process. It should be recognized that IQA correction requests could affect rulemaking outside of the formal rulemaking process. For example, IQA correction requests that are filed before an agency's formal rulemaking process begins could affect when or if an agency initiates a rulemaking.

We found 16 requests for corrections submitted during fiscal years 2003 and 2004 to be related to agency rulemaking. According to our analysis of

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IQA requests, annual IQA reports sent to OMB, and OMB's own reports, and as later confirmed by OMB, five agencies reported having received 16 IQA requests related to rulemaking for the 2-year period. These five agencies were EPA, the Fish & Wildlife Service, the Department of Agriculture's Forest Service, the Department of the Treasury's Alcohol and Tobacco Tax and Trade Bureau, and DOT. These 16 requests—touching on a diverse range of issues, such as air safety, alcohol, chemicals, and the environment—accounted for almost 1 in 5 substantive requests for the 2 years.

- The Fish and Wildlife Service received the largest number of rulemaking-related IQA requests out of the 16 requests related to regulations or rules during fiscal years 2003 and 2004. Seven of the Service's 11 requests were related to proposed rulemaking. These 7 requests represented 44 percent of all rulemaking-related IQA requests received by all agencies during the 2 years.
- The agencies treated 10 of the 16 requests that they received during the 2-year period as comments to proposed rules rather than processing them as IQA requests, and the agencies so informed the IQA petitioner. For example, the Alcohol and Tobacco Tax and Trade Bureau considered an IQA request regarding flavored malt beverages and related proposals as comments to a proposed rule. The bureau informed the IQA petitioner that it was handling the request as a public comment under the procedures of the Administrative Procedure Act, rather than as an IQA correction request. Agencies similarly processed the other nine requests related to regulations or rulemaking.
- As for the other six IQA requests related to rulemaking or regulations, agencies rejected two, are developing responses to two, and were—as of the end of March 2006—awaiting additional information or court decisions before responding to the remaining two.

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## Conclusions

OMB's governmentwide IQA guidelines provide agencies with flexibility to develop their own guidelines to suit their missions. Having executive branch agencies use the Internet to inform the public about the existence of their IQA guidelines, including the IQA correction mechanism, is a step toward improving the transparency of how agencies develop and disseminate information and address information errors, as well as how information users can seek correction of information.

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Given the current status of IQA at agencies, OMB has before it additional opportunities to build on its efforts in implementing IQA so far, a mission on which it embarked a few years ago. For example, it could draw from its experience of working with cabinet and many independent agencies to put additional agency-specific guidelines in place. Likewise, OMB could apply the knowledge from the lessons it and agencies have learned about posting accessible, user-oriented information on agency Web sites. By working with agencies and tapping into public input, OMB could enhance agencies' and the public's involvement in promoting high-quality agency information as well as increasing the public's access to and confidence in that information, thereby helping to further the goal of disseminating quality information.

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## Recommendations for Executive Action

To help ensure that all agencies covered by IQA fulfill their requirements, including implementing IQA guidelines and helping to promote easier public access to IQA information on agency Web sites, we recommend that the Director of OMB take the following three actions:

- work with DHS to help ensure it fulfills IQA requirements and set a deadline for doing so;
- identify other agencies that do not have IQA guidelines and work with them to develop and implement IQA requirements; and
- clarify guidance to agencies on improving the public's access to online IQA information, including suggestions about clearer linkages to that information, where appropriate.

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## Agency Comments and Our Evaluation

In written comments on a draft of this report, the Acting Administrator of OMB's OIRA responded to our recommendations. Regarding our draft report's recommendation to OMB to work with DHS and other agencies not meeting IQA requirements, the Acting Administrator stated that OMB fully supports our recommendation that DHS develop IQA guidelines and that OMB would continue to work with DHS to that end. In our draft report, we had one recommendation for OMB to work with DHS and other agencies to develop IQA guidelines. Based on OIRA's comments, in our final report we made two separate recommendations regarding DHS and the other agencies developing IQA guidelines. Further, we believe that as OIRA continues to work with DHS—which has 22 component agencies—setting a

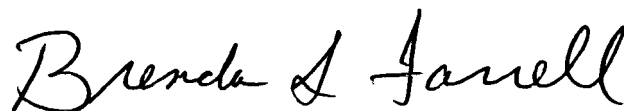
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deadline for DHS to implement IQA guidelines is important. As for the other agencies (many of which are small) without IQA guidelines, OIRA stated it would work with them as they develop and implement information quality measures. OIRA stated that in those efforts, it would consider the resources that would be needed and the potential benefits that would be achieved by having IQA guidelines in place. Regarding our recommendation about public access to online IQA information, OIRA noted it shares GAO's interest in improving public access and will continue to work with agencies to improve dissemination of IQA information. OIRA also provided separate technical corrections and suggestions to the draft of our report, which we have incorporated as appropriate. The written comments are reprinted in appendix IV.

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As agreed with your offices, unless you release its contents earlier, we plan no further distribution of this report until 30 days from its date. At that time we will send copies to other interested congressional committees and the Acting Administrator of OIRA. This report will also be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact me on (202) 512-6806 or by e-mail at [farrellb@gao.gov](mailto:farrellb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report were Robert Goldenkoff, Assistant Director; Ernie Hazera, Assistant Director; Andrea Levine; Keith Steck; and Margit Willems Whitaker.



Brenda S. Farrell  
Acting Director  
Strategic Issues

# Scope and Methodology

To assess the Office of Management and Budget’s (OMB) role in implementing the Information Quality Act (IQA), we reviewed OMB’s IQA documents, including memorandums sent to agencies, and interviewed Office of Information and Regulatory Affairs (OIRA) staff involved with IQA.<sup>1</sup> In addition, we reviewed IQA documents—including guidelines, requests and appeals, agency decisions, and related documents—and interviewed IQA and other knowledgeable officials at the 17 federal agencies identified in table 5. While we reviewed IQA guidelines at all cabinet-level agencies, we conducted interviews at 5 independent agencies and 12 of the 15 federal cabinet agencies and at least one component of each, as shown in table 5.

**Table 5: Agencies Where We Interviewed IQA Officials**

<b>Cabinet agencies and component</b>	
Department of Agriculture • Forest Service	Department of Housing and Urban Development
Department of Commerce • National Oceanic and Atmospheric Administration	Department of the Interior • Fish and Wildlife Service
Department of Defense • Army Corps of Engineers	Department of Justice • Bureau of Justice Statistics
Department of Energy • Energy Information Administration	Department of Labor • Occupational Safety and Health Administration
Department of Health and Human Services • National Institutes of Health	Department of Transportation • Federal Motor Carrier Safety Administration
Department of Homeland Security • Transportation Safety Administration • Federal Emergency Management Agency	Department of the Treasury • Internal Revenue Service
<b>Independent agencies</b>	
Consumer Product Safety Commission	National Aeronautics and Space Administration
Environmental Protection Agency	Nuclear Regulatory Commission
Federal Deposit Insurance Corporation	

Source: GAO analysis of agency information.

<sup>1</sup> We use the term agencies to refer to both federal executive branch cabinet departments and independent agencies covered by the Paperwork Reduction Act.



We selected these agencies to obtain a cross section of agencies that reflect the diverse range of government activities. We made our selection to cover a wide range of criteria, including the organization's size (number of employees in fiscal year 2004); its mission (regulatory versus statistical, for example); and the nature of issues covered by the agency—such as the environment, health, and safety.<sup>2</sup> We discussed with agency officials the development of their IQA guidelines, whether they had received requests for correction of information and how they addressed them, and what role OMB played in all of this.

To further evaluate OMB's role in the implementation of IQA, we reviewed OMB and agency IQA documents for all 15 cabinet agencies and the 5 independent agencies we contacted. These documents included online information, such as OMB memorandums and agency IQA guidelines, related IQA information, and OMB and agency IQA Web sites. Additionally, we reviewed the Web sites of 86 other independent agencies, including commissions, boards, and other entities, covered by the Paperwork Reduction Act to determine whether they had IQA guidelines online, but we did not survey them. Further, we reviewed the *Federal Register* for notices about these agencies' IQA guidelines, as OMB required. We did not contact these 86 individual agencies or survey users of their Web sites, as this was beyond the scope of our review.

Regarding the second objective of determining the number, type, and source of IQA requests, including who submitted them, for fiscal years 2003 and 2004, we contacted agency IQA officials and OMB staff and obtained relevant information from them. We also reviewed OIRA's two reports to Congress to validate data collected through other sources.<sup>3</sup> To the extent the information was available online, we reviewed IQA requests on agency Web sites. To supplement and verify the accuracy and completeness of this information, we interviewed agency and OMB IQA staff and officials. In addition, to categorize the sources of the requests by type of entity, such as

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<sup>2</sup> While we took measures to ensure the selected agencies reflect meaningful criteria for our work, our selection was not intended to be representative. Thus, the findings from our interviews cannot be used to make inferences about all agencies.

<sup>3</sup> Office of Management and Budget, Office of Information and Regulatory Affairs, *Information Quality: A Report to Congress, Fiscal Year 2003* and *Validating Regulatory Analysis: 2005 Report to Congress on the Costs and Benefits of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities*. In both reports OIRA identified the agencies that had guidelines in place and the number of IQA correction requests they received for fiscal years 2003 and 2004.

business, trade group, or nonprofit advocacy organization, we relied on information from the sources and agency descriptions. We made our determination when information was contradictory or not available. Moreover, to determine the final status of IQA requests and any appeals, we reviewed related agency documents, including agency notification letters, and spoke with agency IQA officials about their status. We determined that OMB and agency data were sufficiently reliable for the purposes of this review. The results of our analysis differ from information in OMB's two reports to Congress discussing IQA because of (1) differences between report information about IQA requests and information on agency Web sites and (2) minor report errors, including errors reported by agencies to OMB—such as IQA requests reported for calendar year 2003 instead of fiscal year 2003—that OMB repeated. In addition, we tracked the status of appeals to the end of March 2006 to provide current information, going beyond the end of fiscal year 2004, which is the date OMB used as the cutoff for appeal information in its December 2005 report.

Regarding the third objective of examining whether the implementation of IQA has adversely affected agencies' or overall operations in general and the rulemaking process in particular, we contacted agency IQA and other knowledgeable officials and OMB staff. We also attempted to determine the resources that OMB and agencies committed to implementing IQA by obtaining IQA cost and staff allocation data, but agency officials told us they do not track such information, although the Department of Labor had cost information on setting up a system on the status of IQA requests. In addition, we reviewed the annual IQA reports submitted to OMB by the cabinet-level agencies and the 5 independent agencies with guidelines where we conducted interviews.

Moreover, to better understand specific aspects of IQA requests and how agencies addressed them, as well as to illustrate specific points, we reviewed in detail selected IQA requests at four agencies—the Environmental Protection Agency, the Department of Health and Human Services' National Institutes of Health, the Department of Agriculture's Forest Service, and the Department of the Interior's Fish and Wildlife Service.<sup>4</sup>

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<sup>4</sup> Our case illustrations cannot be used to make inferences about all IQA requests (at the agencies from which the examples were taken or all federal agencies) during the 2-year period we studied.

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Because OMB was still developing its IQA peer review policies at the time of our review, we did not discuss with agency officials their plans for carrying out these future requirements. In addition, although agencies have other mechanisms to correct information, we evaluated only the IQA information correction mechanism.

We conducted our work in Washington, D.C., from March 2005 through July 2006 in accordance with generally accepted government auditing standards.

# Independent Agencies Where Web Sites Were Checked for IQA Guidelines

Agency	IQA guidelines in place and on Web site?	
	Yes	No
1 Advisory Council on Historic Preservation		✓
2 African Development Foundation		✓
3 Agency for International Development	✓	
4 American Battle Monuments Commission		✓
5 AMTRAK (National Railroad Passenger Corporation)		✓
6 Antitrust Modernization Commission		✓
7 Appalachian Regional Commission		✓
8 Access Board	✓	
9 Arctic Research Commission		✓
10 Armed Forces Retirement Home		✓
11 Broadcasting Board of Governors		✓
12 Central Intelligence Agency		✓
13 Chemical Safety and Hazard Investigation Board	✓	
14 Christopher Columbus Fellowship Foundation		✓
15 Commission Regarding Weapons of Mass Destruction		✓
16 Commission on International Religious Freedom		✓
17 Commission on Ocean Policy		✓
18 Commodities Futures Trading Commission	✓	
19 Consumer Product Safety Commission	✓	
20 Corporation for National and Community Service	✓	
21 Court Services and Offender Supervision Agency		✓
22 Defense Nuclear Facilities Safety Board	✓	
23 Denali Commission		✓
24 Environmental Protection Agency	✓	
25 Equal Employment Opportunity Commission	✓	
26 Export-Import Bank of the United States	✓	
27 Farm Credit Administration	✓	
28 Farm Credit System Insurance Corporation		✓
29 Federal Mediation and Conciliation Service		✓
30 Federal Mine Safety and Health Review Commission		✓
31 Federal Retirement Thrift Investment Board		✓
32 Federal Communications Commission	✓	
33 Federal Deposit Insurance Corporation	✓	
34 Federal Energy Regulatory Commission	✓	

**Appendix II**  
**Independent Agencies Where Web Sites Were**  
**Checked for IQA Guidelines**

*(Continued From Previous Page)*

	Agency	IQA guidelines in place and on Web site?	
		Yes	No
35	Federal Housing Finance Board	✓	
36	Federal Labor Relations Authority		✓
37	Federal Maritime Commission	✓	
38	Federal Reserve System	✓	
39	Federal Trade Commission	✓	
40	General Services Administration	✓	
41	Institute of Museum and Library Services	✓	
42	Inter-American Foundation		✓
43	Legal Services Corporation		✓
44	Marine Mammal Commission		✓
45	Merit Systems Protection Board	✓	
46	Migratory Bird Conservation Commission		✓
47	Millennium Challenge Corporation		✓
48	Mississippi River Commission		✓
49	National Aeronautics and Space Administration	✓	
50	National Archives and Records Administration	✓	
51	National Commission on Libraries and Information Science		✓
52	National Capital Planning Commission		✓
53	National Council on Disability		✓
54	National Credit Union Administration	✓	
55	National Endowment for the Arts	✓	
56	National Endowment for the Humanities	✓	
57	National Indian Gaming Commission		✓
58	National Labor Relations Board	✓	
59	National Park Foundation		✓
60	National Science Foundation	✓	
61	National Transportation Safety Board	✓	
62	Northwest Power Planning Council		✓
63	Nuclear Regulatory Commission	✓	
64	Nuclear Waste Technical Review Board	✓	
65	Occupational Safety and Health Review Commission	✓	
66	Office of Navajo and Hopi Indian Relocation		✓
67	Office of Federal Housing Enterprise Oversight	✓	
68	Office of Government Ethics	✓	
69	Office of Personnel Management	✓	

**Appendix II**  
**Independent Agencies Where Web Sites Were**  
**Checked for IQA Guidelines**

*(Continued From Previous Page)*

	Agency	IQA guidelines in place and on Web site?	
		Yes	No
70	Office of Special Counsel	✓	
71	Overseas Private Investment Corporation	✓	
72	Peace Corps	✓	
73	Pension Benefit Guaranty Corporation	✓	
74	Presidio Trust		✓
75	Railroad Retirement Board	✓	
76	Securities and Exchange Commission	✓	
77	Selective Service System	✓	
78	Small Business Administration	✓	
79	Smithsonian Institution		✓
80	Social Security Administration	✓	
81	Social Security Advisory Board		✓
82	State Justice Institute		✓
83	Surface Transportation Board	✓	
84	Susquehanna River Basin Commission		✓
85	Tennessee Valley Authority	✓	
86	Trade and Development Agency		✓
87	U.S. Commission on Civil Rights		✓ <sup>a</sup>
88	U.S. Holocaust Memorial Museum		✓
89	U.S. International Trade Commission	✓	
90	Utah Reclamation Mitigation and Conservation Commission		✓
91	Valles Caldera Trust		✓

Source: GAO analysis of agency information.

<sup>a</sup>The commission has drafted but not finalized guidelines as of late July 2006.

# Organizations That Filed IQA Correction Requests during Fiscal Years 2003 and 2004

Federal department/agency receiving request and filer	Business, trade group, or profit-oriented organization	Nonprofit or other advocacy organization
<b>Department of Agriculture</b>		
W.K. Olsen and Associates, LLC	✓	
Earth Island Institute, etc. (2)		✓
Sierra Club, etc.		✓
Center for Regulatory Effectiveness—same as Department of Health and Human Services filing	✓	
Alliance for the Wild Rockies		✓
<b>Department of Commerce</b>		
Competitive Enterprise Institute—same as Office of Science and Technology Policy filing		✓
Atlantic Salmon of Maine—same as Department of the Interior filing	✓	
Associated Fisheries of Maine, Inc., etc.	✓	
Center for Regulatory Effectiveness, et al.	✓	
<b>Department of Defense</b>		
Public Employees for Environmental Responsibility		✓
Public Interest Group (identity not provided)		✓
<b>Department of Education</b>		
National Wrestling Coaches Association, etc.		✓
<b>Department of Health and Human Services</b>		
Center for Regulatory Effectiveness, etc. (3)—one same as Department of Agriculture filing	✓	
Animal Health Institute (2)	✓	
SafeBlood Technologies, etc.	✓	
Chemical Products Corporation (2)	✓	
Nickel Development Institute	✓	
Styrene Information and Research Center, Inc.	✓	
Salt Institute, etc.	✓	
Environmental Working Group		✓
McNeil Consumer and Specialty Products	✓	
National Legal and Policy Center		✓
American Chemistry Council (2)	✓	

**Appendix III**  
**Organizations That Filed IQA Correction**  
**Requests during Fiscal Years 2003 and 2004**

*(Continued From Previous Page)*

Federal department/agency receiving request and filer	Business, trade group, or profit-oriented organization	Nonprofit or other advocacy organization
<b>Department of the Interior</b>		
Atlantic Salmon of Maine—same as Department of Commerce filing	✓	
Chilton Ranch and Cattle Company	✓	
Public Employees for Environmental Responsibility (2)		✓
Florida Marine Contractors Association	✓	
National Association of Home Builders	✓	
Union Electric Company	✓	
Partnership for the West	✓	
Center for Regulatory Effectiveness	✓	
<b>Department of Justice</b>		
National Coalition for Asian Pacific American Community Development		✓
<b>Department of Labor</b>		
Liquid Container/Plaxicon	✓	
<b>Department of Transportation</b>		
Marine industry consultant	✓	
<b>Department of the Treasury</b>		
Diageo North America, Inc.	✓	
<b>Consumer Product Safety Commission</b>		
American Chemistry Council	✓	
Competitive Enterprise Institute (2)		✓
Association of Home Appliance Manufacturers	✓	
McDowell Owings Engineering, Inc.	✓	
<b>Office of Science and Technology Policy (Executive Office of the President)</b>		
Competitive Enterprise Institute—same as Department of Commerce filing		✓
<b>Environmental Protection Agency</b>		
Chemical Products Corporation	✓	
Center for Regulatory Effectiveness, etc. (2)	✓	
Competitive Enterprise Institute		✓
Friends of Massachusetts Military Reservation		✓
Morgan, Lewis & Bockius, LLP	✓	
Geronimo Creek Observatory (4)		✓
Perchlorate Study Group	✓	



**Appendix III  
Organizations That Filed IQA Correction  
Requests during Fiscal Years 2003 and 2004**

*(Continued From Previous Page)*

<b>Federal department/agency receiving request and filer</b>	<b>Business, trade group, or profit-oriented organization</b>	<b>Nonprofit or other advocacy organization</b>
National Multi-Housing Council, etc.	✓	
U.S. Chamber of Commerce	✓	
National Paint and Coatings Association, etc.	✓	
Dow Chemical Company	✓	
National Association of Home Builders	✓	
NPC Services, Inc.	✓	
American Chemistry Council	✓	
<b>Federal Communications Commission</b>		
TeleTruth		✓

Source: GAO analysis of agency and OMB information.

Note: The numbers in parentheses following an entity's name indicate the number of substantive IQA requests submitted to the agency.

# Comments from the Office of Management and Budget



EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

**JUL - 5 2006**

Ms. Brenda S. Farrell  
Acting Director  
Strategic Issues  
Government Accountability Office  
441 G Street, SW  
Washington, DC 20548

Dear Ms. Farrell:

Thank you for the opportunity to comment on the Government Accountability Office's (GAO) draft report titled, "Information Quality Act: Expanded Oversight and Clearer Guidance by the Office of Management and Budget Could Improve Agencies' Implementation of the Act" (GAO-06-765).

We greatly appreciate GAO's efforts to evaluate the Office of Management and Budget's (OMB) oversight role. The Information Quality Act (IQA) is very important to us and we are grateful for the time and energy GAO devoted to this evaluation. In the draft report, GAO made two recommendations to OMB.

First, your draft report recommends that we "work with DHS and other agencies lacking IQA guidelines to help ensure they fulfill IQA requirements, and set a deadline for doing so." We fully support your recommendation that DHS develop IQA guidelines. While the Coast Guard, Bureau of Customs and Border Protection, Federal Emergency Management Agency, and the Secret Service do have guidelines in place, we agree that DHS department-wide guidelines are important. We will continue to work with DHS to assist the department in completing its guidelines as soon as is practicable. We will also continue to work with the other agencies (many of which are small agencies) as they develop and implement information quality measures. As we work with these agencies, especially the very small ones, we will take into account the resources that would be needed and the potential benefits that would be achieved by having IQA guidelines in place.

Your draft report also recommends that we "clarify guidance to agencies about how to improve the public's access to IQA information on agency web sites, including suggestions about clearer linkages to that information." We share your interest in improving public access to IQA information and will continue to work with agencies to improve their dissemination of IQA information in a manner consistent with OMB policies.<sup>1</sup> As you know, agencies consider the needs and demands of their specific user groups and the general public when determining how to

<sup>1</sup> Policies include OMB Circular A-130 "Management of Federal Information resources," and OMB Memorandum M-06-02 "Improving Public Access to and Dissemination of Government Information and Using the Federal Enterprise Architecture Data Reference Model."

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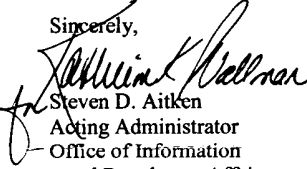
**Appendix IV**  
**Comments from the Office of Management**  
**and Budget**

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disseminate information, including IQA information, on their websites. While some agencies may determine a link on their homepage is an effective means for disseminating IQA information, others may find alternative methods more appropriate. OMB's policies on agency dissemination and websites preserve for agencies this operational flexibility, while emphasizing the bottom-line importance of each agency ensuring that the public can readily and easily obtain public information about that agency's programs and activities.

Thank you again for the opportunity to review and comment on your draft report.

Sincerely,

  
for Steven D. Aitken  
Acting Administrator  
Office of Information  
and Regulatory Affairs

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