

DRAFT

SUBJECT: Promoting Greater Public Access to Government Information and Improving Information Resource Management Including Through Using the Federal Enterprise Architecture Data Reference Model

The efficient, cost-effective, and consistent management, use, and dissemination of government information is essential to promote a more citizen-centered government.

This memorandum reminds agencies of the breadth of their existing responsibilities, including under the Paperwork Reduction Act (Title 44, Chapter 35, United States Code) and the E-Government Act of 2002 (Public Law 107-347), identifies procedures to help fulfill them (section I), and identifies new procedures (section II) to improve information resource management and oversight and use the Federal Enterprise Architecture Data Reference Model (DRM).

I. Selected Existing Information Resource Management Responsibilities

You are already required to:

- Maximize the practical utility of and public benefit from information collected by or for the Federal government and reduce collection burdens on the public;¹
- Seek to satisfy new information needs through interagency or intergovernmental sharing of information, or through commercial sources where appropriate, before creating or collecting new information;²
- Consider the effects of agency efforts on the public, State and local governments, and industry to avoid undue burden and inappropriate competition;³ establish and maintain communications with and provide adequate notice to the public, State and local governments, and industry prior to initiating, substantially modifying, or terminating significant information dissemination products;⁴

¹ Section 3504(c) of the Paperwork Reduction Act of 1995 (Title 44, Chapter 35, United States Code) and Title 5 of the Code of Federal Regulations, Part 1320.

² OMB Circular A-130, "Management of Federal Information Resources," section 8(a)(1)(d) available at <http://www.whitehouse.gov/omb/circulars/a130/a130trans4.pdf>.

³ When creating, collecting, using, and disseminating government information, agencies must limit the expenditure of scarce public resources to that necessary for the proper performance of an agency function. Specifically with respect to disseminating information, agencies must take advantage of all public and private sector dissemination channels and avoid competing with industry by providing "value added" services not necessary to perform a required agency function. For example, agencies could provide raw underlying data they use internally, while market forces determine the extent to which value added services are desired by users. Public notice and comment are important to ensure an adequate understanding of the marketplace and avoid inappropriate competition.

⁴ OMB Circular A-130, "Management of Federal Information Resources," section 8(a)(6)(i) and (j).

- Adopt a basic standard of data quality (including objectivity, utility, and integrity) as a performance goal and incorporate information quality criteria into agency dissemination practices;⁵
- Ensure records management programs provide adequate and proper documentation of agency activities and ensure the ability to access records regardless of form or medium;⁶ and
- Identify how information and data are created, maintained, accessed, and used; define agency data and describe relationships between mission and program performance and information resources to improve the efficiency of mission performance; and define data and describe relationships among data elements used in the agency's information systems and related information systems of other agencies, State and local governments and the private sector.⁷

You are also already required to:

- Disseminate information to the public on timely and equitable terms;⁸ establish, maintain, and publish inventories, priorities, and schedules of all agency information dissemination products;⁹ take advantage of all dissemination channels;¹⁰ and use aids to locate government information such as catalogs and directories;¹¹ and
- Help the public locate government information including by December 31, 2005, providing on your principal websites search capabilities appropriately equivalent to industry best practices to assist the public in locating government information intended for public use.¹²

⁵ Federal Register in Volume 2, No. 67 at 8452 on February 22, 2002, "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies."

⁶ OMB Circular A-130, "Management of Federal Information Resources," section 8(a)(4) and associated guidelines from the National Archives and Records Administration.

⁷ OMB Circular A-130, "Management of Federal Information Resources," section 8(b)(2)(b)(iv).

⁸ Timely and equitable terms include among other things meeting requirements of section 508 of the Rehabilitation Act and providing to members of the public without electronic access alternative ways to obtain information, e.g., hard copies. See OMB Circular A-130 for a comprehensive discussion of timeliness and equitability.

⁹ OMB Memorandum M-05-04, "Policies for Federal Agency Public Websites." In addition to publishing inventories of specific information dissemination products, agencies must also publish inventories of other information to which public access is appropriate. In deciding what other information to include on an inventory and permit access by the public, agencies should take the broadest possible view and assume at least some members of the public or specific users will be interested in the data. Such additional information could include databases of raw data even though actual use would require a high degree of sophistication. Again, it would be appropriate for an agency to make this information available, but let the market determine what value added services are desired by the public.

¹⁰ OMB Circular A-130, "Management of Federal Information Resources," section 8(a)(5)(d)(iii) and (6)(g), dissemination channels include Federal, State and local governments, libraries, private sector entities, and the Government Printing Office.

¹¹ OMB Circular A-130, "Management of Federal Information Resources," section 8(a)(6)(c) and (d).

¹² OMB Memorandum M-05-04, "Policies for Federal Agency Public Websites," available at <http://www.whitehouse.gov/omb/memoranda/fy2005/m05-04.pdf>. Search capabilities employing industry best practices include mechanisms to crawl and index agency information and thereby better prepare it for search and retrieval by the public.

Increasingly sophisticated Internet search functions (including their associated crawl and indexing mechanisms) greatly simplify how agencies can promote public access to their information and meet the longstanding requirements of section 3504(b)(2) of the Paperwork Reduction Act of 1995 and the more recent ones found in section 207(d) of the E-Government Act of 2002.¹³ Therefore, with respect to disseminating information to the public-at-large, provided agencies are meeting their other dissemination requirements, publishing directly to the Internet all agency information intended for public use and thereby exposing it to freely available or other search functions is the most cost-beneficial way to meet these two requirements.

However, in some instances, such as for data interchanges among specific identifiable groups, or for significant information dissemination products, advance information preparation, e.g., using commercially available indexing tools or developing formal information models, may be appropriate.¹⁴ In deciding what level of advance preparation is necessary, agencies should consider the significance of the information dissemination product or data interchange to the agency mission and the level of public interest. As significance increases, so too may the need for advance information preparation. When formal information models are deemed necessary, agencies must apply the new policies below concerning such models and the Federal Enterprise Architecture DRM.¹⁵

II. New Responsibilities

As you know, your existing requirements inter-relate since neither they nor the results achieved when implemented are mutually exclusive. For example, organizing and categorizing government information and defining data relationships, not only improves sharing with other agencies, it also enhances retrieval of relevant information to improve agency program performance by increasing accuracy and reducing response times. Similarly, establishing and maintaining information inventories and sharing information across agencies for one program purpose can also help identify and reduce the unnecessary collection of duplicative information from the public and lessen the associated burden. For example, information inventories are used by agencies when describing in their information collection requests why any similar information already available cannot be used or modified to meet their needs. The following new responsibilities continue this inter-relationship.

You must now:

- By June 30, 2006, document in or append to your Information Resources Management (IRM) Strategic Plan specific descriptions of how you are meeting existing

¹³ Section 3504(b)(2) of the Paperwork Reduction Act requires agencies to foster greater sharing, dissemination, and access to public information, including through the use of the Government Information Locator Service. Section 207(d) of the E-Government Act requires agencies to organize and categorize government information and ensure it is searchable electronically in ways that are interoperable across agencies.

¹⁴ Specific identifiable groups, also known as “communities of interest,” can include any combination of Federal agencies, State, local, and tribal governments, industry, scientific community, academia, and specific interested members of the general public. Formal information models include but are not limited to data models, data dictionaries, thesauri, taxonomies, topic maps, ontologies, controlled vocabularies, and exchange packages.

¹⁵ ADD LINK TO DRM

requirements,¹⁶ and publish your plans on your agency's public website together with your information dissemination product catalogs, directories, inventories, priorities, and schedules.

- If you conclude formal information models are necessary to:
 - Ensure the initial and sustained implementation of existing requirements including meeting the documented needs of your agency or a specific identifiable group, then you must now:
 - Ensure your formal information models are consistent with existing voluntary consensus standards or follow OMB policies for modifying or creating new standards;¹⁷ and
 - By June 30, 2006, describe in your IRM Strategic Plan how use of your agency's formal information models meets your IRM requirements and their relationship to the DRM.
- Specifically, with respect to organizing and categorizing information, defining data, and describing relationships among data elements, including to improve information sharing, you must use the DRM or justify why you are not doing so.¹⁸

III. Additional Information

The DRM introduces concepts, terms, and approaches to aid you in managing data and fulfilling your existing responsibilities. The Chief Information Officers Council Architecture and Infrastructure Committee will continue to work with OMB and the agencies to ensure the DRM meets existing and evolving needs.

Separate additional guidance for sharing terrorism information is being developed as required by the Intelligence Reform and Terrorism Prevention Act of 2004. To avoid duplication and lack of interoperability, agencies must ensure their terrorism information sharing activities are consistent with this memorandum's guidance concerning use of the DRM.

Through continued evaluation of agency budget submissions, reviews of agency information collection requests, assessments of agency enterprise architectures, and other means, OMB will work with the agencies to identify cost-effective opportunities to reduce duplicative processes, reduce the collection and creation of information, increase information sharing, and promote more efficient and effective information resources management.

¹⁶ Supporting documentation can include EA documents.

¹⁷ OMB Circular A-119, "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities" available at <http://www.whitehouse.gov/omb/circulars/a119/a119.html>.

¹⁸ Use of the DRM will be reviewed as part of your annual EA assessment and justifications for not using it must include reasonable evidence the DRM is not necessary or is not a cost-effective method to meet agency requirements. Evidence could include a comparison of costs and performance results against established baselines.