

On April 24, 2019, OMB issued a memorandum to reinforce, clarify, and interpret agency responsibilities, M-19-15, *Improving Implementation of the Information Quality Act*. NIST is committed to complying with the following updates contained in M-19-15, including Implementation Update 4.1, which provides that agencies will not take more than 120 days to respond to a request for correction (RFC) without the concurrence of the party that made the request.

***Implementation Update 1.1:*** Drawing on experience implementing the Guidelines, agencies should revisit the parameters for identifying “influential information.” Agencies should provide specific guidance to program managers for determining the amount and type of pre-dissemination review necessary. Agencies should identify specific types of information the agency produces that are “influential” and should provide a rigorous process for determining whether types of information not specifically listed by the guidelines qualify as “influential.”

***Implementation Update 4.1:*** Agencies should revise their procedures to reflect more realistic timelines for RFCs. Revised procedures should, at minimum, provide that agencies will not take more than 120 days to respond to an RFC without the concurrence of the party that requested the request for correction.

***Implementation Update 4.2:*** In its response to an RFC, agencies should not opine on the requestor’s or the agency’s policy position.

***Implementation Update 4.3:*** The agency response should contain a point-by-point response to any data quality arguments contained in the RFC and should refer to a peer review that directly considered the issue being raised, if available.

***Implementation Update 4.4:*** Agencies should share draft responses to RFCs and appeals with OMB prior to release to the requestor for assessment of compliance with the above norms.

***Implementation Update 4.5:*** To ensure the integrity of the appeals process, agencies should ensure that those individuals reviewing and responding to the appeals request were not involved in the review and initial response to the RFC.

NIST believes that it does not currently produce or sponsor the distribution of influential scientific information (including highly influential scientific assessments) within the definitions promulgated by OMB. As a result, at this time NIST has no agenda of forthcoming influential scientific disseminations to post on its website in accordance with OMB's Information Quality Bulletin for Peer Review.