

# **INFORMATION COLLECTION BUDGET**

**OF THE  
UNITED STATES  
GOVERNMENT**



**2018-2021**

**OFFICE OF MANAGEMENT AND BUDGET**  
OFFICE OF INFORMATION AND REGULATORY AFFAIRS

## Table of Contents

Executive Summary .....	1
Chapter 1: Information Collection Burden .....	1
Chapter 2: Paperwork Reduction Act Compliance .....	9
About the Office of Information and Regulatory Affairs .....	12

## Executive Summary

Under the Paperwork Reduction Act of 1995 (PRA),<sup>1</sup> the Office of Management and Budget (OMB) is required to report to Congress on the paperwork burden<sup>2</sup> imposed on the public by the Federal Government and efforts to reduce this burden. For over 40 years, since the enactment of the original Paperwork Reduction Act of 1980, OMB has complied with this reporting requirement by issuing an Information Collection Budget (ICB). The 2018 ICB reported on the paperwork burden imposed on the public during fiscal year (FY) 2017, and explored other issues pertaining to the implementation of the PRA. This publication will report on the paperwork burdens and violations for FY 2018, FY 2019, FY 2020, and FY 2021.<sup>3</sup>

### **Total Paperwork Burden**

This ICB now presents information on the burden from all government agencies covered by the PRA.<sup>4</sup> The prior ICB provided information from 36 agencies with the largest paperwork burden.

In FY 2018, the public spent an estimated 11.4 billion hours responding to Federal information collections from agencies, which was slightly lower than the reported 11.5 billion hours in FY 2017. In FY 2019, the public spent 11.0 billion hours; in FY 2020, 11.6 billion hours; and in FY 2021, 10.0 billion hours.

### **Summary of Total Burden and Sources of Paperwork Burden Changes**

The total paperwork burden changes are broken down into the following categories: discretionary agency actions, statutory changes, lapses in renewal or discontinuation, and adjustments (changes in agency estimations). Table 1 shows the changes in these categories as compared to the prior year:

	<b>Total Burden</b>	<b>Total Change from Previous FY</b>	Discretionary Agency Actions	Statutory Changes	Lapses or Discontinuations	Adjustments
<b>FY 18</b>	<b>11,357</b>	<b>-186</b>	112	20	-33	-285
<b>FY 19</b>	<b>10,998</b>	<b>-359</b>	-199	-170	-14	23
<b>FY 20</b>	<b>11,618</b>	<b>620</b>	159	186	-1	277
<b>FY 21</b>	<b>9,974</b>	<b>-1,645</b>	327	25	-9	-1,988

<sup>1</sup> 44 U.S.C. §§ 3501–3520; *see also* 5 CFR Part 1320 (codifying OMB’s implementing regulations).

<sup>2</sup> As defined by the PRA, “burden” refers to “time, effort, or financial resources expended by persons to generate, maintain, or provide information to or for a Federal agency, including the resources expended for: (A) reviewing instructions; (B) acquiring, installing, and utilizing technology and systems; (C) adjusting the existing ways to comply with any previously applicable instructions and requirements; (D) searching data sources; (E) completing and reviewing the collection of information; and (F) transmitting, or otherwise disclosing the information.” 44 U.S.C. § 3502(2). The PRA also recognizes that information collections have value. In practice, agencies and OIRA review all information collection requests to help ensure information collections yield the greatest possible public benefit. As this report documents, the Administration is redoubling efforts—including the retrospective review of existing information collections and regulations—to make reporting and paperwork less burdensome, and more valuable, to the government and the public.

<sup>3</sup> Prior ICBs were dated for the year after the data for which they were reporting. For example, the 2018 ICB reported on FY 2017 PRA compliance and burden. This convention began when OIRA changed its ICB reporting in 2008. Moving forward, the ICB’s title will reflect its reporting year to avoid confusion.

<sup>4</sup> This represents 71 to 73 agencies in a given fiscal year.

**Violations**

OMB reports 521 violations of the Paperwork Reduction Act and related business processes in FY 2018, 374 violations in FY 2019, 359 violations in FY 2020, and 408 violations in FY 2021. Many of these violations were largely attributable to business process issues, such as failing to submit a discontinuation notice.

## Chapter 1: Information Collection Burden

Pursuant to the PRA, the OMB oversees agencies' information collection activities and reports to Congress annually on the effectiveness of the PRA's implementation. The ICB is OMB's report to Congress, providing a detailed accounting of the information collection activities of the Federal Government in a given fiscal year. This report presents the overall paperwork burden that the Federal Government imposed on the public in FY 2018 through FY 2021.

Information collections are defined by the PRA as the obtaining, causing to be obtained, soliciting, or requiring the disclosure to third parties or the public, of facts or opinions by or for an agency, regardless of form or format, calling for either answers to identical questions posed to, or identical reporting or recordkeeping requirements imposed on, ten or more persons, other than agencies, instrumentalities, or employees of the United States; or answers to questions posed to agencies, instrumentalities, or employees of the United States which are to be used for general statistical purposes.<sup>5</sup> The terms "paperwork" and "information collection(s)" have the same meaning for the purposes of this report.

Burden is represented as hours spent by the public responding to Federal information collections. When an agency estimates and seeks to reduce the paperwork burden it imposes on the public, the agency must consider the time that an individual or entity spends reading and understanding a request for information, as well as the time spent developing, compiling, recording, reviewing, and providing the information. Consequently, paperwork burden includes more than just the time necessary to file a tax form or fill out a benefits application.<sup>6</sup>

Although this report focuses on paperwork burden and PRA compliance issues, the PRA involves more than just the minimization of burden and adherence to specified processes. OMB engages in substantive efforts to help ensure that information collections by the Federal Government yield the greatest possible public benefit. The PRA seeks to enhance the productivity, efficiency, and effectiveness of government programs by improving the quality and use of data. Information collection can strengthen decision-making, accountability, and openness in government and society. Chapter 2 includes more information about OMB's efforts to enhance the utility of Federal information collections.

### 1.1. Total Paperwork Burden

This ICB now presents information on the burden from all government agencies covered by the PRA. According to agency estimates of paperwork burden in FY 2018 through FY 2021 the public spent 11.4, 11.0, 11.6, and 10.0 billion hours respectively responding to or complying with Federal information collections.

### 1.2. Discussion of Paperwork Burden Changes

OMB reports changes in paperwork burden in four categories. These categories help identify which burden changes were done through proactive agency action and are practically felt by the public:

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<sup>5</sup> 44 U.S.C. § 3502(3).

<sup>6</sup> See Office of Mgmt. & Budget, Exec. Office of the President, M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act 4* (Apr. 13, 2022), available at <https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-10.pdf>

1. Discretionary agency actions;
2. New statutory requirements;
3. Lapses in renewal or discontinuation—as a result of the expiration of burden producing activities or lapses in approval of such activities; and
4. Adjustments to existing burden estimates—often as a result of demographic changes, changes in agency estimation methodology, and other outside forces.

Each of these sources of estimated paperwork burden change is discussed in the pages that follow. They are also summarized in Table 2 thru Table 5.<sup>7</sup>

### **1) Discretionary Agency Actions**

In some areas, agencies have considerable discretion in managing their information collection activities and the burden associated with those activities. For example, in administering a grant program where performance reporting is statutorily required, an agency may have discretion in deciding the frequency or depth of grantee reporting. For burden tracking purposes, OMB classifies these types of changes as “Due to Agency Discretion.” Given that agencies have control over these actions, OMB considers actions within this category of burden change to be the best indicator of agency performance with respect to information collection.

On average, in each of the reporting years about 22 agencies reported cutting their burden through discretionary means. Agencies with notable burden lowering actions were the Department of Education in FY 2020, using their discretion to cut 19.1 million hours or 17% of their total burden, and the Office of Personnel Management which, in FY18, reported a decrease of 1.5 million hours by simplifying the USAJobs Resume Builder.

For each reporting year, between 14 and 20 agencies reported increasing their discretionary paperwork burden that year. The largest net increases in this category were 200.7 million hours from the Department of Health and Human Services and 119.5 million hours from the Department of Treasury in FY 2021, which were driven by COVID response policies. Another notable increase was from GSA, increasing their burden in FY 2020 by 130% or 23.2 million hours by soliciting additional feedback on their service delivery from individuals, businesses, and organizations.

### **2) New Statutory Requirements**

Each year laws are enacted that create new programs for Federal agencies to implement. Quite frequently, these new programs require collection, use, and dissemination of information. Typically, new legislative initiatives and amendments require more data collection. Changes to collections related to existing statutory requirements are shown as discretionary changes.

The most significant burden changes from new statutory requirements came from the Treasury Department in FY 2019 and FY 2020. In FY 2019, the Treasury Department cut 190.7 million burden hours deriving from the Tax Cuts and Jobs Act. However, in FY 2020 new statutory requirement increased burden by 170.5 million hours to implement the

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<sup>7</sup> These tables include only agencies with over 500,000 hours in annual burden.

Coronavirus Aid, Relief, and Economic Security Act. In FY 2018 and FY 2021, new burden hours from new statutes totaled less than 25 million hours across the whole government.

### **3) Lapses in Renewal or Discontinuation**

The Paperwork Reduction Act requires collections to be renewed at least every three years. To ensure agencies are not allowing active collections to expire improperly, OMB's Office of Information and Regulatory Affairs (OIRA) requires agencies to submit a discontinuation request when they end the use of a collection. If an agency submits that request within, or at the end of, the approval period it is recorded as a discretionary change. However, if an agency does not take action to renew a collection and fails to submit a discontinuation request, its burden will be removed from the inventory and recorded as a lapse in discontinuation. This reflects collections that were removed from the inventory but that OIRA cannot be confident their use has ended.

If a collection is improperly allowed to expire and is brought back into compliance by the agency, the increase in burden will also be recorded in this category. Further, collections that agencies discover have been in use without any previous PRA approval are recorded here.

Lapses in renewal or discontinuation are not a large driver of burden changes in any of the reporting Fiscal Years. The largest change for an agency was the Department of Homeland Security in FY 2019 with a 28.8 million burden hour decrease due to some larger collections falling out of compliance improperly. These collections were continued and brought back into PRA compliance in following years.

### **4) Adjustments to Agency Burden Estimates**

Burden changes associated with adjustments to agency burden estimates are often the largest source of burden changes. The "adjustments" category differs from other sources of burden change in the sense that, although adjustments represent real overall burden increases, the burden imposed on individual respondents for individual information collections does not change. For example, consider program eligibility and information collection requirements for receiving Social Security benefits. Although the reporting requirements for receiving such benefits may not change year-over-year, the burden for the collection may increase as greater numbers of Baby Boomers age and apply for benefits. The burden estimates are therefore "adjusted" to reflect the natural increase (or potential decrease) in overall burden.

There are two common types of adjustments in burden:

- a) *Agency Re-estimation of Burden*: An agency may re-evaluate a prior burden estimate for the collection, conclude that its prior estimate was inaccurate, and revise the estimate accordingly. Importantly, the agency has not changed the requirements of the collection, or added to or subtracted from the category of people who are required to respond to the collection.
- b) *Burden Changes from Demographic, Economic, and Other External Factors*: An agency may change the estimated burden of a collection if there has been a change in the number of individuals or entities that the agency estimates will respond to the collection—and this change is due to factors outside an agency's control.

A typical example of such an adjustment is when demographic changes result in more (or fewer) people applying for a Federal benefit, and thus results in more (or fewer) applications being filled-out and submitted. Another example of such an adjustment is when economic changes result in changes in the number of businesses being created (and thus more tax forms are submitted). In both of these types of situations, the agency has not changed the requirements of the collection, and the agency has not redefined who has to respond to the collection. Instead, the changes in external factors either increase or decrease the number of individuals or entities that will respond to the collection. The Treasury Department often has the largest changes in this category due to changing estimates of tax filing burdens. For example, in FY 2021 the Treasury Department decreased their burden estimates by over 2 billion hours through agency adjustments after reevaluating the burden estimates for business entity tax filers.



**Table 2: FY 2018 Paperwork Burden Changes by Agency (in millions of hours)<sup>8</sup>**

	FY 2017 Total Paperwork Burden	FY 2018 Changes Due to Agency Discretion		FY 2018 Changes Due to New Statutes		FY 2018 Changes Due to Lapses in Renewal or Discontinuation		FY 2018 Adjustments		FY 2018 Total Hour Changes		FY 2018 Total Paperwork Burden
			% change from '17		% change from '17		% change from '17		% change from '17		% change from '17	
TREAS	8187.3	113.1	1%	14.4	0%	0.3	0%	-235.2	-3%	-107.3	-1%	8080.0
HHS	1389.5	-16.3	-1%	2.3	0%	-26.2	-2%	-0.1	0%	-40.1	-3%	1349.4
SEC	246.3	0.3	0%	2.4	1%	0.0	0%	0.1	0%	2.7	1%	249.1
DHS	192.1	-0.1	0%	0.0	0%	0.5	0%	-0.1	0%	0.7	0%	192.8
DOT	189.2	-1.0	-1%	0.0	0%	0.6	0%	1.8	1%	1.5	1%	190.7
USDA	178.3	1.1	1%	0.0	0%	0.6	0%	2.2	1%	3.9	2%	182.2
EPA	173.9	2.9	2%	0.8	1%	-0.6	0%	-5.2	-3%	-2.0	-1%	171.8
DOL	168.1	-0.9	-1%	0.1	0%	-0.1	0%	-1.9	-1%	-2.7	-2%	165.3
FTC	134.3	-0.2	0%	0.0	0%	-1.2	-1%	-8.3	-6%	-9.7	-7%	124.6
ED	91.6	6.8	7%	0.0	0%	0.0	0%	-2.0	-2%	4.8	5%	96.5
FCC	71.3	-0.9	-1%	0.0	0%	0.0	0%	-0.4	-1%	-1.3	-2%	70.0
SSA	48.1	0.6	1%	0.0	0%	0.0	0%	1.3	3%	1.9	4%	50.0
STATE	46.7	0.8	2%	0.0	0%	-0.4	-1%	2.8	6%	3.3	7%	50.0
OPM	44.2	-1.5	-3%	0.0	0%	-0.1	0%	-0.1	0%	-0.5	-1%	43.8
DOC	76.3	2.0	3%	0.0	0%	-0.5	-1%	-35.3	-46%	-33.7	-44%	42.6
DOD	40.3	1.0	3%	0.0	0%	0.5	1%	-0.9	-2%	0.6	2%	40.9
DOJ	30.3	3.4	11%	0.0	0%	0.0	0%	0.0	0%	3.4	11%	33.7
CFPB	32.2	0.1	0%	0.0	0%	0.0	0%	0.0	0%	0.1	0%	32.3
FAR	32.1	-0.4	-1%	0.0	0%	0.0	0%	0.0	0%	-0.4	-1%	31.7
HUD	43.2	0.3	1%	0.0	0%	-7.0	-16%	-10.8	-25%	-17.4	-40%	25.8
FDIC	12.1	0.0	0%	0.0	0%	0.0	0%	3.2	26%	3.2	26%	15.3
DOI	15.0	0.3	2%	0.0	0%	0.0	0%	-0.8	-5%	-0.5	-3%	14.5
FERC	12.0	0.4	4%	0.0	0%	0.0	0%	-0.3	-2%	0.2	2%	12.2
CFTC	11.7	0.4	4%	0.0	0%	0.0	0%	-0.3	-2%	0.2	1%	11.8
FRS	10.8	-0.1	-1%	0.0	0%	0.0	0%	0.6	6%	0.6	5%	11.3
EEOC	9.5	0.0	0%	0.0	0%	0.0	0%	1.5	16%	1.5	16%	11.1
NCUA	6.3	0.1	2%	0.0	0%	1.2	19%	2.5	40%	3.8	61%	10.1
NRC	10.5	0.0	0%	0.0	0%	0.0	0%	-0.6	-6%	-0.6	-5%	10.0
VA	8.1	0.1	2%	0.0	0%	-0.2	-2%	-0.1	-1%	-0.1	-2%	8.0
NSF	7.9	-0.2	-3%	0.0	0%	0.0	0%	0.0	0%	-0.2	-3%	7.7
CPSC	7.1	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	7.2
OMB	2.7	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	2.7
DOE	2.3	0.0	0%	0.0	0%	-0.8	-33%	0.7	31%	0.0	-2%	2.2
GSA	2.3	-0.2	-9%	0.0	0%	0.0	0%	0.0	0%	-0.2	-9%	2.1
NIGC	1.6	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	1.6
SBA	1.4	-0.1	-10%	0.0	0%	0.0	0%	0.0	0%	-0.1	-9%	1.3
EGOV	1.2	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	1.2
NASA	1.0	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	1.0
ITC	0.7	0.2	34%	0.0	0%	0.0	0%	0.0	0%	0.2	34%	0.9
CNCS	0.8	0.0	0%	0.0	0%	-0.1	-7%	0.0	0%	0.0	-5%	0.8

<sup>8</sup> As a result of rounding, rows of some agencies may not sum.

**Table 3: FY 2019 Paperwork Burden Changes by Agency (in millions of hours)<sup>9</sup>**

	FY 2018 Total Paperwork Burden	FY 2019 Changes Due to Agency Discretion		FY 2019 Changes Due to New Statutes		FY 2019 Changes Due to Lapses in Renewal or Discontinuation		FY 2019 Adjustments		FY 2019 Total Hour Changes		FY 2019 Total Paperwork Burden
			% change from '18		% change from '18		% change from '18		% change from '18		% change from '18	
TREAS	8080.0	-209.5	-3%	-190.7	-2%	0.7	0%	88.7	1%	-310.8	-4%	7769.1
HHS	1349.4	-17.7	-1%	0.9	0%	11.2	1%	14.2	1%	8.8	1%	1358.1
SEC	249.1	-0.4	0%	0.0	0%	0.0	0%	3.2	1%	2.9	1%	251.9
USDA	182.2	-2.1	-1%	20.5	11%	-0.8	-1%	-2.2	-1%	15.4	8%	197.6
EPA	171.8	4.1	2%	0.0	0%	1.2	1%	0.6	0%	5.9	3%	177.7
DHS	192.8	-1.5	-1%	0.0	0%	-28.8	-15%	1.5	1%	-28.9	-15%	163.9
DOL	165.3	-1.9	-1%	0.0	0%	0.0	0%	-1.6	-1%	-3.5	-2%	161.9
DOT	190.7	0.7	0%	0.1	0%	-0.1	0%	-54.9	-29%	-54.2	-28%	136.5
FTC	124.6	0.0	0%	0.0	0%	1.2	1%	-0.2	0%	1.0	1%	125.6
ED	96.5	12.4	13%	0.0	0%	0.0	0%	2.2	2%	14.6	15%	111.1
DOC	42.6	27.3	64%	0.0	0%	0.0	0%	-0.1	0%	27.1	64%	69.8
STATE	50.0	5.5	11%	0.0	0%	-1.3	-3%	0.2	0%	4.4	9%	54.3
SSA	50.0	-1.9	-4%	-0.6	-1%	0.0	0%	4.0	8%	1.5	3%	51.5
OPM	43.8	-0.4	-1%	0.0	0%	0.0	0%	0.0	0%	-0.4	-1%	43.3
DOD	40.9	-3.1	-8%	0.0	0%	1.1	3%	3.9	10%	1.9	5%	42.9
FCC	70.0	-0.4	-1%	0.0	0%	0.0	0%	-29.1	-42%	-29.5	-42%	40.5
DOJ	33.7	-1.6	-5%	0.0	0%	0.0	0%	0.0	0%	-1.6	-5%	32.1
CFPB	32.3	-1.5	-5%	-0.1	0%	0.0	0%	0.6	2%	-1.0	-3%	31.3
HUD	25.8	-2.9	-11%	0.0	0%	6.3	25%	0.2	1%	3.6	14%	29.4
FAR	31.7	-6.7	-21%	0.0	0%	-0.2	-1%	0.0	0%	-6.9	-22%	24.9
FDIC	15.3	-0.1	-1%	0.0	0%	0.0	0%	0.7	4%	0.5	4%	15.9
DOI	14.5	1.3	9%	0.0	0%	0.0	0%	-1.6	-11%	-0.3	-2%	14.2
FERC	12.2	0.1	1%	0.0	0%	0.0	0%	-0.1	-1%	-0.1	0%	12.1
FRS	11.3	-0.1	-1%	0.2	1%	0.0	0%	-0.1	-1%	-0.1	-1%	11.2
NCUA	10.1	0.0	0%	0.0	0%	0.0	0%	-0.2	-2%	-0.2	-2%	9.9
NRC	10.0	0.0	0%	0.0	0%	0.0	0%	-0.1	-1%	-0.1	-1%	9.8
EEOC	11.1	0.0	0%	0.0	0%	-2.0	-18%	0.0	0%	-2.0	-18%	9.1
VA	8.0	0.6	8%	0.0	0%	0.1	2%	0.0	0%	0.8	10%	8.7
NSF	7.7	0.1	1%	0.0	0%	0.0	0%	0.0	0%	0.1	1%	7.8
CPSC	7.2	0.0	0%	0.0	0%	0.0	0%	0.0	-1%	0.0	-1%	7.1
CFTC	11.8	-0.4	-4%	0.0	0%	0.0	0%	-6.8	-57%	-7.2	-61%	4.6
DOE	2.2	0.1	2%	0.0	0%	0.8	36%	-0.1	-4%	0.8	34%	3.0
GSA	2.1	0.0	-1%	0.0	0%	0.0	0%	0.0	0%	0.0	-1%	2.1
NIGC	1.6	0.0	0%	0.0	0%	0.0	0%	0.0	1%	0.0	1%	1.6
NASA	1.0	0.6	63%	0.0	0%	0.0	0%	0.0	0%	0.6	63%	1.6
EGOV	1.2	0.4	32%	0.0	0%	-0.2	-14%	0.0	0%	0.2	17%	1.3
SBA	1.3	0.1	7%	0.0	0%	-0.2	-16%	0.0	0%	-0.1	-10%	1.1
ITC	0.9	0.1	11%	0.0	0%	0.0	0%	0.0	0%	0.1	10%	1.0
CNCS	0.8	0.0	1%	0.0	0%	-0.1	-8%	0.0	0%	-0.1	-7%	0.7

<sup>9</sup> As a result of rounding, rows of some agencies may not sum.

**Table 4: FY 2020 Paperwork Burden Changes by Agency (in millions of hours)<sup>10</sup>**

	FY 2019 Total Paperwork Burden	FY 2020 Changes Due to Agency Discretion		FY 2020 Changes Due to New Statutes		FY 2020 Changes Due to Lapses in Renewal or Discontinuation		FY 2020 Adjustments		FY 2020 Total Hour Changes		FY 2020 Total Paperwork Burden
			% change from '19		% change from '19		% change from '19		% change from '19		% change from '19	
TREAS	7769.1	-1.8	0%	170.5	2%	0.6	0%	215.9	3%	385.2	5%	8154.4
HHS	1358.1	13.1	1%	0.4	0%	-10.4	-1%	32.0	2%	35.4	3%	1393.5
SEC	251.9	17.9	7%	3.8	2%	0.0	0%	16.1	6%	37.9	15%	289.8
USDA	197.6	-1.5	-1%	7.1	4%	-1.5	-1%	-2.1	-1%	2.0	1%	199.5
DHS	163.9	-2.2	-1%	0.0	0%	15.5	10%	5.7	4%	19.1	12%	183.0
EPA	177.7	1.0	1%	0.1	0%	-0.4	0%	-3.2	-2%	-2.6	-1%	175.2
DOL	161.9	1.9	1%	0.0	0%	0.0	0%	4.2	3%	6.1	4%	168.0
FAR	24.9	118.5	477%	0.0	0%	0.0	0%	0.0	0%	118.5	477%	143.4
DOT	136.5	-0.3	0%	1.9	1%	-0.1	0%	-6.9	-5%	-5.4	-4%	131.0
FTC	125.6	0.0	0%	0.0	0%	0.0	0%	-1.3	-1%	-1.6	-1%	124.0
ED	111.1	-19.1	-17%	0.0	0%	0.0	0%	-1.4	-1%	-20.6	-18%	90.6
SSA	51.5	7.0	14%	1.0	2%	0.0	0%	23.4	46%	31.5	61%	83.0
DOC	69.8	-2.3	-3%	0.0	0%	0.0	0%	0.1	0%	-2.2	-3%	67.5
STATE	54.3	1.3	2%	0.0	0%	-1.5	-3%	0.0	0%	-0.2	0%	54.2
HUD	29.4	23.2	79%	0.0	0%	-1.4	-5%	-0.7	-3%	21.0	72%	50.4
DOD	42.9	2.2	5%	0.0	0%	0.2	0%	2.2	5%	4.5	10%	47.3
FCC	40.5	-4.4	-11%	0.0	0%	0.0	0%	3.1	8%	-1.3	-3%	39.2
DOJ	32.1	-1.0	-3%	0.0	0%	0.1	0%	0.0	0%	-0.9	-3%	31.3
SBA	1.1	32.2	2842%	0.0	0%	-0.2	-13%	-2.7	-235%	29.4	2603%	30.5
CFPB	31.3	2.8	9%	0.0	0%	0.0	0%	-14.2	-45%	-11.4	-36%	19.9
EEOC	9.1	0.0	0%	0.0	0%	-1.1	-12%	9.2	101%	8.1	89%	17.3
DOI	14.2	-0.4	-3%	0.0	0%	0.0	0%	0.2	1%	-0.2	-1%	14.1
FERC	12.1	0.1	1%	0.0	0%	0.0	0%	0.1	1%	0.3	2%	12.4
FDIC	15.9	-0.2	-1%	0.0	0%	0.0	0%	-4.6	-29%	-4.8	-30%	11.1
OPM	43.3	-32.8	-76%	0.0	0%	0.0	0%	0.0	0%	-32.8	-76%	10.5
NCUA	9.9	0.0	0%	0.0	0%	0.0	0%	-0.1	-1%	-0.1	-1%	9.7
NRC	9.8	0.0	0%	0.0	0%	0.0	0%	-0.2	-2%	-0.2	-2%	9.7
FRS	11.2	-1.5	-13%	0.6	6%	0.0	0%	-1.2	-11%	-2.0	-18%	9.2
VA	8.7	0.9	10%	0.6	7%	-1.2	-14%	-0.1	-2%	0.3	4%	9.1
CFTC	4.6	0.1	1%	0.0	0%	0.0	0%	3.6	78%	3.7	80%	8.3
NSF	7.8	-0.5	-7%	0.0	0%	0.0	0%	0.0	0%	-0.5	-7%	7.3
CPSC	7.1	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	7.1
GSA	2.1	2.7	130%	0.0	0%	0.0	0%	0.0	0%	2.7	130%	4.8
DOE	3.0	-0.1	-4%	0.0	0%	0.0	0%	0.1	2%	0.0	-2%	3.0
ONDSCP	0.0	1.9	0%	0.0	0%	0.0	0%	0.0	0%	1.9	0%	1.9
NASA	1.6	0.0	0%	0.0	0%	0.0	-1%	0.0	0%	0.0	-1%	1.6
ITC	1.0	0.6	57%	0.0	0%	0.0	0%	0.0	0%	0.6	58%	1.5
EGOV	1.3	-0.2	-11%	0.0	0%	0.0	0%	0.0	0%	-0.2	-11%	1.2
NIGC	1.6	0.0	0%	0.0	0%	0.0	0%	-0.4	-27%	-0.4	-27%	1.2
CNCS	0.7	-0.1	-12%	0.0	0%	0.1	9%	0.0	1%	0.0	-1%	0.7

<sup>10</sup> As a result of rounding, rows of some agencies may not sum.

**Table 5: FY 2021 Paperwork Burden Changes by Agency (in millions of hours)<sup>11</sup>**

	FY 2020 Total Paperwork Burden	FY 2021 Changes Due to Agency Discretion		FY 2021 Changes Due to New Statutes		FY 2021 Changes Due to Lapses in Renewal or Discontinuation		FY 2021 Adjustments		FY 2021 Total Hour Changes		FY 2021 Total Paperwork Burden
			% change from '20		% change from '20		% change from '20		% change from '20		% change from '20	
TREAS	8154.4	119.5	2%	13.4	0%	-12.2	0%	-2028.6	-25%	-1907.8	-23%	6246.5
HHS	1393.5	200.7	14%	6.7	1%	-1.6	0%	7.2	1%	212.9	15%	1606.5
SEC	289.8	2.3	1%	0.0	0%	0.2	0%	-0.1	0%	2.4	1%	292.2
USDA	199.5	2.0	1%	0.9	0%	0.1	0%	0.2	0%	3.2	2%	202.7
DHS	183.0	-4.8	-3%	0.0	0%	13.6	7%	-0.8	0%	7.9	4%	190.9
DOL	168.0	20.2	12%	3.6	2%	0.1	0%	-1.6	-1%	22.2	13%	190.2
EPA	175.2	-0.2	0%	0.1	0%	0.4	0%	-0.2	0%	0.1	0%	175.2
SSA	83.0	0.4	1%	0.0	0%	0.0	0%	57.0	69%	57.4	69%	140.3
DOT	131.0	-4.5	-3%	0.1	0%	-0.6	0%	-4.4	-3%	-9.3	-7%	121.7
FTC	124.0	0.9	1%	0.0	0%	0.0	0%	-7.2	-6%	-6.4	-5%	117.6
FAR	143.4	-26.8	-19%	0.0	0%	0.0	0%	0.0	0%	-26.8	-19%	116.6
ED	90.6	-7.5	-8%	0.0	0%	-0.5	-1%	0.4	0%	-7.7	-9%	82.8
DOC	67.5	0.0	0%	0.0	0%	0.0	0%	-0.7	-1%	-0.7	-1%	66.8
STATE	54.2	0.1	0%	0.0	0%	0.0	0%	-1.9	-3%	-1.8	-3%	52.4
HUD	50.4	0.8	2%	0.0	0%	-0.6	-1%	-1.3	-3%	-1.0	-2%	49.4
DOD	47.3	-2.3	-5%	0.0	0%	3.9	8%	-0.2	0%	1.5	3%	48.8
SBA	30.5	17.9	58%	0.0	0%	0.0	0%	0.0	0%	17.9	58%	48.4
FCC	39.2	3.4	9%	0.0	0%	0.0	0%	-0.4	-1%	3.0	8%	42.3
DOJ	31.3	-2.9	-9%	0.0	0%	0.0	0%	0.0	0%	-2.9	-9%	28.3
CFPB	19.9	0.9	5%	0.0	0%	0.0	0%	0.2	1%	1.1	5%	20.9
EEOC	17.3	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	17.3
DOI	14.1	0.1	1%	0.0	0%	0.0	0%	-0.2	-1%	-0.1	-1%	14.0
FERC	12.4	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.1	0%	12.4
NRC	9.7	0.0	0%	0.0	0%	0.0	0%	0.2	2%	0.2	2%	9.9
VA	9.1	5.6	61%	0.0	0%	-5.0	-55%	-0.1	-1%	0.5	5%	9.5
NCUA	9.7	0.0	0%	0.0	0%	-0.1	-1%	-0.5	-5%	-0.5	-5%	9.2
FDIC	11.1	0.0	0%	0.0	0%	0.0	0%	-2.8	-26%	-2.8	-25%	8.3
CFTC	8.3	-0.5	-6%	0.0	0%	0.0	0%	0.3	3%	-0.2	-3%	8.1
FRS	9.2	-0.2	-2%	0.0	0%	0.0	0%	-1.4	-15%	-1.5	-17%	7.7
CPSC	7.1	0.0	0%	0.1	1%	0.0	0%	0.0	0%	0.1	1%	7.2
NSF	7.3	-0.3	-5%	0.0	0%	0.0	0%	0.0	0%	-0.3	-5%	6.9
GSA	4.8	1.7	35%	0.0	0%	0.0	0%	0.0	0%	1.7	35%	6.5
OPM	10.5	0.3	2%	0.0	0%	-7.6	-72%	0.0	0%	-7.4	-70%	3.2
DOE	3.0	0.0	-1%	0.0	0%	0.0	0%	0.0	0%	0.0	-1%	2.9
ONDSCP	1.9	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	1.9
NASA	1.6	0.2	9%	0.0	0%	0.0	-1%	0.0	0%	0.1	8%	1.7
ITC	1.5	-0.2	-11%	0.0	0%	0.0	0%	0.0	0%	-0.2	-11%	1.4
EGOV	1.2	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	1.2
NIGC	1.2	0.0	0%	0.0	0%	0.0	0%	0.0	0%	0.0	0%	1.2
CNCS	0.7	0.0	-5%	0.0	0%	0.0	1%	0.0	1%	0.0	-3%	0.7

<sup>11</sup> As a result of rounding, rows of some agencies may not sum.

## Chapter 2: Paperwork Reduction Act Compliance

The PRA assigns each agency's Chief Data Officer with the responsibility for ensuring that his or her agency complies with the Act. OMB's Office of Information and Regulatory Affairs (OIRA) is responsible for approving information collection requests under the PRA. To help the public and the agencies monitor compliance with the information collection provisions of the PRA, OMB publishes a list of violations in the ICB (see Appendix A). These violations are collected by OMB through our internal PRA management system and directly from both executive departments and agencies and independent agencies.

OMB reports two categories of violations of the Paperwork Reduction Act: (1) collections in use without OMB approval and (2) lapses in renewal or discontinuation. Violations falling under the first category, collections in use without OMB approval, occur when the agency fails to submit the information collection request to OMB before it begins to collect information. Violations falling under the second category, lapses in renewal or discontinuation, occur when the agency fails to submit its request to OMB to renew or discontinue its approval for a collection prior to the expiration date.

Both categories are considered violations of the PRA and point to different issues in an agency's management of their PRA responsibilities. A high number of lapses in renewal and failures to discontinue could indicate the agency should improve its internal processes for tracking their active collection. A large number of collections in use without OMB approval could indicate that the agency's program offices are not aware of the legal requirements of the PRA or that their CDO is not providing proper oversight. However, it also shows the agency is identifying violations when they occur and ensuring they are brought into compliance. Finally, violations must be considered in relation to the size of the agency and their number of collections. Large agencies with a high number of collections likely have dedicated staff to ensure compliance with the PRA. These agencies should have relatively small number of violations. Small agencies often do not have dedicated staff for PRA work, have limited expertise in the PRA, and can suffer from a lack of institutional knowledge. Their violations show they may have room to improve their internal procedures through training and experience, but it may not be a systemic issue.

OMB continues its use of an enhanced search process for lapses in renewal or discontinuation used since FY 2011. A violation is recorded when a collection expires without being properly extended or discontinued. A separate violation is recorded if that collection is reinstated in a future fiscal year. By taking action before a collection expires, agencies can better inform the public of its intended activities and improve the reporting of burden under the PRA. Thus, OMB continues to report all of the collections comprising the other two types of lapses as violations, because OMB considers the submissions of discontinuation notices—good government actions associated with avoiding these lapses—as business processes that support compliance with the PRA.

## 2.1. Total Violations

OMB reports 521 violations of the PRA and related business processes during FY 2018, 374 during FY 2019, 359 during FY 2020, and 408 during FY 2021.<sup>12</sup> OMB reports total violations inclusive of both lapses in renewal or discontinuation and uses without an OMB control number. In addition, OMB reports as violations all business process issues arising when agencies have not submitted a notice of discontinuation or renewal prior to a collection's expiration of OMB approval.

For FY 2018, OMB is reporting 36 collections in use without OMB control numbers, 28 in FY 2019, 32 in FY 2020, and 35 in FY 2021. For violations due to lapses in renewal or discontinuation, there were 485 in FY 2018, 346 in FY 2019, 327 in FY 2020, and 373 in FY 2021.

To put these violations in perspective, agencies maintain about 9,000 active OMB control numbers in the inventory of approved information collections. Moreover, OIRA desk officers review and conclude on over four thousand information collection requests annually. The vast majority of collection of existing collections are renewed or discontinued before their expiration dates.

## 2.2. Reducing Violations

Table 6 shows the top 10 agencies based on the total number of violations over all four Fiscal Years.

OMB is committed to working with agencies to reduce violations. OMB continues to work with agencies to submit renewals and discontinuations for collections on a timely basis and to seek OMB approval when agencies collect information from ten or more persons or from all or a substantial majority of an industry. OMB offers an electronic system that enables agencies to generate reports of collections that have approvals nearing expiration and, as part of its day-to-day operations, OMB regularly answers questions from agencies about the appropriate action for collections that have approvals nearing expiration.

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<sup>12</sup> In FY 2011, OIRA changed how we measured PRA violations, thus these violations can only be validly compared against violations after FY 2010.

Table 6: FY 2018 – FY 2021 Agencies with Highest Number of Violations<sup>13</sup>

<b>Agency</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>Total</b>
Department of Health and Human Services	115	81	96	89	381
Department of Veterans Affairs	104	53	57	107	321
Department of Housing and Urban Development	67	37	30	43	177
Department of Homeland Security	53	50	33	24	160
Department of Defense	42	14	14	12	82
Department of Transportation	24	20	16	20	80
Department of the Treasury	10	14	11	8	43
Corporation for National and Community Service	11	9	9	5	34
Environmental Protection Agency	13	9	5	6	33
Peace Corps	3	4	11	14	32

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<sup>13</sup> See Appendix A for the full list.

## **About the Office of Information and Regulatory Affairs**

The Paperwork Reduction Act of 1980 (Pub. L. No. 96-511) and its successor, the Paperwork Reduction Act of 1995 (Pub. L. No. 104-13), established the Office of Information and Regulatory Affairs (OIRA) in the Office of Management and Budget to oversee agency information resources management, information collection, and use of information technology. Under this authority, OIRA develops policies and guidelines to promote the management, dissemination, privacy, and security of government information. OIRA also coordinates Federal statistical policies and resources and is responsible for the review of agency rulemaking activity under Executive Orders 14094, 13563, and 12866. The Administrator of OIRA is appointed by the President and confirmed by the Senate.

Principal contributors to this report were Cortney Higgins and Michael Johnson. If you have questions about any of the information collections discussed in this report, please visit our website at [www.RegInfo.gov](http://www.RegInfo.gov).