EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET

WASHINGTON, D.C. 20503

January 24, 2024

MEMORANDUM FOR CHIEF DATA OFFICERS

FROM: Richard Revesz
Administrator, Office of Information and Regulatory Affairs

SUBJECT: Data Call for the FY 2023 Information Collection Budget

The Paperwork Reduction Act of 1995 (PRA)[1] expresses a commitment to minimizing paperwork burdens and enhancing the quality of information collected while ensuring the greatest possible benefit to the public.[2] The PRA also directs the Office of Information and Regulatory Affairs (OIRA) in the Office of Management and Budget (OMB) to report on agencies' efforts that support the goals of the PRA, including accomplishments and planned initiatives to reduce burden on the public. The Information Collection Budget (ICB) describes these efforts, and provides data on cumulative paperwork burdens and violations of the PRA as well.

The FY 2022 ICB data call brought renewed attention to how the PRA may be used to improve interactions between the public and their government.[3] If members of the public struggle with complicated forms, lengthy wait times, or overly burdensome or stigmatizing information requests in order to receive Federal benefits and services, they may miss out on access to much-needed support. Even when individuals are able to successfully seek support or assistance, confusing forms or cumbersome processes serve as a tax on their time, and one that all too frequently falls most heavily on the underserved communities many of these programs are intended to help. As the FY 2022 ICB data call noted, "[e]very interaction between the Federal Government and the public should be seen as an opportunity for the Government to save people time, to deliver the level of service that the public expects and deserves, and to ensure that individuals, businesses, and others can access much-needed public programs."[4]

In July 2023, OIRA issued the FY 2022 ICB Report, entitled *Tackling the Time Tax: How the Federal Government Is Reducing Burdens to Accessing Critical Benefits and Services*. The report highlighted over 100 burden reduction initiatives from 20 Federal

[1] 44 U.S.C. §§ 3501–3520. See also the implementing regulations at 5 C.F.R. Part 1320.
[2] 44 U.S.C. § 3501.
[3] Off. of Mgmt. & Budget, Exec. Off. of the President, *Data Call for the FY 2022 Information Collection Budget* (May 2023), *available at* https://www.whitehouse.gov/wp-content/uploads/2023/05/2022-ICB-Data-Call.pdf.
[4] *Id.* at 1.

agencies.[5] Of particular note, the report included six in-depth case studies of specific high-impact initiatives, illustrating how through regulatory changes, leveraging data-sharing, form digitization and modernization, and simplifying or eliminating questions or processes, the Federal government can expand access to and minimize burdens in services ranging from farm loan applications to recertifying for disability benefits. These case studies model many of the approaches highlighted in OMB M-22-10, *Improving Access To Public Benefits Programs Through the Paperwork Reduction Act*[6] and OIRA's supplemental memorandum *Strategies for Reducing Administrative Burden in Public Benefit and Service Programs ("Burden Reduction Strategies" memo).*[7] OMB M-22-10 reminds Federal agencies of their responsibility under the PRA to (1) accurately estimate the burdens experienced by the public when accessing benefit programs and (2) use that analysis to minimize burdens, with particular emphasis on burden reduction for underserved communities. The *Burden Reduction Strategies* memo provides a further overview of available strategies for minimizing burdens consistent with the PRA.

To continue supporting the goals of this Administration, the ongoing implementation of OMB M-22-10, and the PRA, this year's ICB data call builds on the reporting requirements first established last year, as outlined below:

1. **FY 2023 BRIs –** We are asking both Executive Agencies and Independent Agencies[8] to provide information regarding new or upcoming planned burden reduction initiatives (BRIs).
    - Similar to the FY 2022 ICB data call, rather than an enumeration of all potential initiatives, we are requesting agencies submit more-detailed information regarding only their most significant burden reduction efforts, with a particular focus on efforts that lower public burden or further the objectives of Executive Orders 13985,[9] 14058,[10] and 14091[11] and OMB M-22-10.[12] We encourage agencies to provide initiatives that reflect a variety of approaches to minimizing burden on the public. The data call includes a field specifically to flag any initiatives related to either (1) the

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[5] Off. of Mgmt. & Budget, Exec. Off. of the President, *Tackling the Time Tax: How the Federal Government Is Reducing Burdens to Accessing Critical Benefits and Services* (July 2023), *available at* https://www.whitehouse.gov/wp-content/uploads/2023/07/OIRA-2023-Burden-Reduction-Report.pdf.
[6] Off. of Mgmt. & Budget, Exec. Off. of the President, OMB M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act* (Apr. 13, 2022), *available at* https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-10.pdf.
[7] https://www.whitehouse.gov/wp-content/uploads/2022/12/BurdenReductionStrategies.pdf
[8] See list of agencies covered below.
[9] Exec. Order No. 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, 86 Fed. Reg. 7,009 (Jan. 25, 2021).
[10] Exec. Order No. 14058, *Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government*, 86 Fed. Reg. 71,357 (Dec. 16, 2021).
[11] Exec. Order No. 14091, *Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, 88 Fed. Reg. 10,825 (Feb. 22, 2023).
[12] By significant burden reduction efforts, we mean efforts that are anticipated to (1) yield systematic, rather than a one-time, burden reductions; (2) affect a large population of individuals who are eligible or likely eligible for benefits and services; (3) affect traditionally underserved communities, as defined in the listed Executive Orders, especially communities facing multiple or compounding disadvantages; and (4) produce insights that could be scaled, replicated, or applied to other programs.

appropriate re-use of administrative data to reduce burdens on the public, such as through data sharing; or (2) simplifying, streamlining, or expanding access to grant applications and notices of funding opportunity.

2. **FY 2022 BRIs –** We are requesting progress updates on the BRIs provided in response to the FY 2022 ICB data call, with a particular focus on initiatives that were still in the strategy or early development phases last year.
   - This data call includes a list of all identified BRIs submitted for FY 2022 for agencies to reference in providing these updates.
3. **Special Topics –** In addition to specific initiatives, we are asking agencies to provide information regarding certain cross-cutting or thematic special topics that can be related to helping understand or reducing burdens. This is a new request for the FY 2023 ICB data call. Those topics are
   - Language access initiatives;
   - Mechanisms for agency personnel to identify or report upwards known burdens or ideas for reducing burden on the public. For example, an agency might have a process for proactively soliciting feedback from "navigators" or frontline workers who facilitate completing applications or other forms; and
   - Processes or tools the agency operates to solicit suggestions for burden reduction from the public beyond the expected Federal Register notice and comment periods. For example, an agency might, on its PRA statement, list a website or email inbox where it receives information collection feedback on an ongoing basis.
4. **PRA Violations –** The process related to submissions of PRA violations remains the same as previous years for all Agencies and can be found in Appendix E.

For additional information on how agencies are to respond to this Data Call, please see the Appendices.

Appendix A: General Instructions for Completing the FY 2023 ICB Data Call

1. When are responses to this memorandum due?

Submissions are due to OIRA, Office of Management and Budget (OMB) no later than **COB Thursday, February 29th.**

2. Who must respond to this memorandum?

All Executive Agencies as well as Independent Agencies subject to the PRA[13] are required to respond.[14] However, for agencies with less than 10 million burden hours in FY 2023, we do not require submissions in response to Appendix B (FY 2023 BRIs), Appendix C (FY 2022 BRIs), or Appendix D (special topics). The following Executive Agencies and Independent Agencies with more than 10 million PRA burden hours are subject to all aspects of this data call:

Executive Agencies

- Department of Agriculture
- Department of Commerce
- Department of Defense
- Department of Education
- Department of Health and Human Services
- Department of Homeland Security
- Department of Housing and Urban Development
- Department of Justice
- Department of Labor
- Department of State
- Department of the Interior
- Department of the Treasury
- Department of Transportation
- Department of Veterans Affairs
- Environmental Protection Agency
- Equal Employment Opportunity Commission
- Federal Acquisition Regulation
- Small Business Administration
- Social Security Administration

Independent Agencies

- Consumer Financial Protection Bureau
- Federal Communications Commission
- Federal Energy Regulatory Commission
- Federal Trade Commission

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[13] *See* 5 U.S.C. § 3502(5) (providing a list of independent regulatory agencies subject to the PRA).

[14] A list of agencies, including independent regulatory agencies, that have submitted collections of information to OIRA is available at www.reginfo.gov. After navigating to the website, hover over "Information Collection Review" and click on "Search." On the search website loads, you will be able to review collections of information submitted by a particular agency.

Securities and Exchange Commission

3. What must my agency's submission include?

The 2023 ICB Data Call requests agencies submit four pieces of information:

1. **FY 2023 BRIs –** new or upcoming planned initiatives (only agencies listed in Appendix A, Q2; see further instructions in Appendix B)
2. **FY 2022 BRIs –** Progress updates on the initiatives provided in response to the FY 2022 data call, with a particular focus on initiatives that were still in the strategy or early development phases last year (only agencies listed in Appendix A, Q2; see further instructions in Appendix C).
3. **Special Topics –** Provide information regarding certain cross-cutting or thematic special topics (only agencies listed in Appendix A, Q2; see further instructions in Appendix D).
4. **Violations Report** (all agencies, see further instructions in Appendix E).

Each senior official responsible for the Paperwork Reduction Act of an Executive Agency or Independent Agency must send to OIRA by **COB Thursday, February 29th** the attached template. In addition, as detailed in **Appendix E**, each agency's Chief Data Officer (CDO) is required to review and complete the preliminary PRA violations report. The template and PRA Violations Report can be found on https://community.max.gov/x/babjk.

4. What changes has OMB made to this data call?

The FY 2023 ICB data call broadly continues the format first used last year for the FY 2022 ICB data call. New requirements concerning this request include agencies' provision of:

- Progress updates on the BRIs provided in response to the FY 2022 ICB data call, with a particular focus on initiatives that were still in the strategy or early development stages last year.
- Information regarding certain cross-cutting or thematic special topics.

The data call repeats the request that the Executive Branch and Independent agencies listed in Appendix A, Question 2 (see above) identify new or upcoming BRIs. Agencies should also note that this data call continues the practice started last year of requiring all agencies (including those not listed in Appendix A, Question 2) to report PRA violations.

All the reporting elements of this ICB can be found on https://community.max.gov/x/babjk.

5. In what format and how should the Agency provide this information to OMB?

Agencies must use the following templates to complete the data call:

a) The FY23 ICB Reporting Template (please review all tabs).

b) The 2023 Violations Report.

All templates can be found on https://community.max.gov/x/babjk. All information required under this memorandum should be sent electronically to Kelsi Feltz (Kelsi.L.Feltz2@omb.eop.gov), Kyle Gardiner (Kyle.S.Gardiner@omb.eop.gov), and your agency's OIRA Desk Officer.

6. How does the ICB fit into OMB's initiatives under OMB M-23-22, *Delivering A Digital-First Public Experience* and the 21st Century Integrated Digital Experience Act (IDEA) Act?

The PRA's purpose includes ensuring that information technology is acquired, used, and managed to improve performance of agency missions, including the reduction of information collection burdens on the public.[15] OMB M-23-22[16] and the 21st Century IDEA[17] further support this goal by outlining steps for agencies to improve the digital experience for the public. Delivering a digital-first public experience represents a significant opportunity to make it easier for the public to access the information and services they use and count on each and every day.

Building on the direction provided in the 21st Century IDEA, M-23-22 requires to the greatest extent practicable that agencies:

- Make forms available to the public in a digital format
- Make services provided to the public available in a digital channel and in a manner that maximizes self-service task or transaction completion
- Not require a handwritten signature ("wet signature") or other in-person identity proofing requirements as a requirement for completing a public-facing form or service without providing the public with an equivalent digital method

M-23-22 also directs agencies to:

- Write content for websites and digital services in accordance with Federal Plain Language Guidelines[18] to ensure it is easy to read and understand
- Deduplicate content across websites within their agency as well as across government to avoid causing confusion or obscuring the most appropriate content
- Optimize and organize online content to help the public find what they are looking for as efficiently as possible

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[15] 44 U.S.C. § 3501(10)

[16] Off. of Mgmt. & Budget, Exec. Off. of the President, OMB M-23-22, Delivering a Digital-First Public Experience (Sept. 22, 2023), available at https://www.whitehouse.gov/omb/management/ofcio/delivering-a-digital-first-public-experience/.

[17] *Id.* § 3501 note.

[18] Plain Language Action & Info. Network, *Federal Plain Language Guidelines*, https://www.plainlanguage.gov/guidelines/ (last visited Jan. 3, 2023).

Such efforts are aligned with the burden reduction goals of the PRA and OMB M-22-10 and should be considered for inclusion in responding to this data call.

7. Will OMB conduct meetings on my agency's submission?

OMB will schedule, as needed, meetings with an agency on its progress toward burden reduction initiatives and other responses to this data call.

8. Who should I contact for further information about specific issues relating to my agency?

Questions about specific agency matters should be directed to your agency's desk officer within OIRA. Questions related to this data call, the submission templates, or other general questions can be directed to Kelsi Feltz (Kelsi.L.Feltz2@omb.eop.gov) and Kyle Gardiner (Kyle.S.Gardiner@omb.eop.gov).

Appendix B: FY 2023 Burden Reduction Initiatives (BRIs)

1. What is the purpose of this Appendix to the data call?

This portion of the data call is intended to identify new, in-progress, or planned burden reduction initiatives.

2. What is an appropriate initiative in response to this data call?

We ask you to identify **three initiatives**, in the areas sketched below, to reduce paperwork burdens on the public in accessing and utilizing benefits and services and to enhance the efficiency of information collections. We seek initiatives that

a. Significantly reduce the burden per response or over all on the public;

b. Lead to a comprehensive review of an entire program (both within the agency and, in the case of related information collection activities, among agency components or across agencies), including regulations and procedures, with the goal of burden reduction; and

c. Improve program performance by enhancing the efficiency of agency information collections (both within the agency and, in the case of related information collection activities, among agency components or across agencies).

Please note: Initiatives **must not** consist only of methodological changes in how agencies estimate burden unless it is coupled with a substantive burden-reducing action (OIRA is supportive of efforts that also include improvements of burden estimate methodologies consistent with Section 1 of OMB M-22-10).

3. On what areas of burden reduction should agencies focus?

We recommend agencies focus on efforts that are anticipated to (1) yield systematic, rather than one-time, burden reductions; (2) affect a large population of individuals who are eligible or likely eligible for benefits and services; (3) affect traditionally underserved communities, as defined in Executive Orders 13985, 14058, and 14091, especially communities facing multiple or compounding disadvantages; and (4) produce insights that could be scaled, replicated, or applied to other programs. Note that efforts need not relate to changes to forms that are occurring exclusively through the PRA (*i.e.*, Information Collection Request) approval process; for example, an initiative could be related to regulatory changes that reduce the need for applicants to take unnecessary, duplicative, or burdensome process steps such as in-person meetings.

We encourage agencies to provide initiatives that reflect a variety of approaches to minimizing burden on the public. The data call includes a field specifically to flag any initiatives related to either (1) the appropriate re-use of administrative data for reducing burdens on the public, such as through data sharing; or (2) simplifying, streamlining, or expanding access to grant applications and notices of funding opportunity.

More generally, we recommend consideration of initiatives, consistent with the illustrations below, that eliminate unnecessary complexity, standardize inconsistent processes and requirements, eliminate duplicative or otherwise unnecessary reporting requirements, use pre-populated forms, and improve coordination among multiple offices that gather information from a common group of stakeholders. Synthesis of reporting platforms within and across agencies should be considered.

We particularly recommend agencies closely review OMB M-22-10, which provides guidance to agencies on how agencies should identify and assess burden-reduction initiatives. Further, Appendix A of that memo shows opportunity areas for burden reductions in government collections.

Of course, agencies are not limited to these burden reduction areas, but we ask that they consider these areas in particular. Agencies are encouraged to consult with their OIRA desk officers as needed with respect to their burden reduction plans.

- **Use of "Short Form" options:** Significant burden reductions can be achieved by providing respondents the option of using streamlined short forms for situations of lesser complexity or importance. This step is particularly useful for applications to receive a Federal benefit. By adopting short forms similar in concept to the IRS Tax Form 1040EZ, agencies can eliminate unnecessary burden and complexity.

- **Reducing unnecessary record retention requirements on regulated entities:** Administrative record retention requirements can often be costly, as regulated entities must set aside valuable storage space, time, and human resources to maintain records. Simply reducing the amount of time that entities must retain records (to the extent consistent with law) could result in significant reductions in paperwork burden.

- **Electronic communication and "fillable fileable" forms (or data systems):** Electronic communication can substantially reduce burdens on respondents and simultaneously increase efficiency in data collection and processing. In particular, OMB seeks initiatives that implement "fillable fileable" approaches where feasible, appropriate, and consistent with law. By reducing or even eliminating the use of paper, such initiatives allow entirely electronic communication between agencies and the public. This may include the pre-population of appropriate forms, particularly those imposing high burdens.

- **Frequency of information collection:** In some instances, monthly or daily information collections can be far more burdensome to the public than collections on a quarterly, bi-annual, or annual basis. OMB seeks initiatives that reexamine the frequency of routine reporting requirements to determine whether less frequent reporting would meet program needs.

- **Maximizing the appropriate re-use of data that are already collected:** Administrative or program data can sometimes be re-used or shared to reduce the paperwork burdens imposed on the public. Such administrative or program data may be held either within the agency asking for the new information or by other agencies. OMB encourages agencies to share data to the extent practical, appropriate, and consistent with applicable laws, regulations, and policies.[19]

4. What information about these initiatives must we submit and how do we submit it?

In the reporting template entitled "FY23 ICB Reporting Template", under the tab "2023 BRIs", there is a list of fields for the information that we request you submit. All burden initiatives should be included within the same template document. When you submit your completed template document, we ask that you include your Agency's acronym at the beginning of the file name. For example, "HHS FY22 ICB Reporting Template." These details are provided on https://community.max.gov/x/babjk.

Instructions for Burden Reduction Initiatives

Within the burden reduction initiative template under the tab "FY 2023 BRIs", we ask that your submission include:

a. **Agency:** Your agency name.

b. **Subagency:** The subagency responsible for the initiative.

c. **Initiative Title:** A title of the initiative.

d. **Description:** A concise description of the program or programs that are affected; relevant burdens or barriers and how they will be targeted; a description of the affected public; and the importance of the collection on those impacted (for instance, in access to specific benefits or services).

e. **Strategy to Achieve Reduction:** What are the specific burdens or barriers to be targeted by this effort, and how will this initiative lower those burdens or barriers? (For example, through streamlining questions, changing or lowering collection requirements, creating an online platform, partnering with community-based organizations for application assistance.)

f. **Stakeholder Engagement:** Did the agency engage stakeholders, such as members of the public, state and local governments, community-based organizations, worker groups, advocacy groups, legal aid providers, and social service providers, when designing this initiative? If so, please briefly describe outreach efforts, including

[19] Off. of Mgmt. & Budget, Exec. Off. of the President, OMB M-11-02, *Sharing Data While Protecting Privacy* (Nov. 3, 2010), *available at* https://www.whitehouse.gov/sites/default/files/omb/memoranda/2011/m11-02.pdf.

modes of engagement, targeted stakeholders, and how engagement informed the burden reduction strategy.

g. **Focus of Interest (Y/N):** Does the listed initiative include a focus on one of two areas of interest: (1) data sharing or data matching; or (2) streamlining, simplifying, or expanding access to grant applications and notices of funding opportunities? A yes (Y) or no (N) response will suffice, though we encourage agencies to provide further derail in the sections above (d. Description and e. Strategy to Achieve Reduction).

h. **Relevant Statutes and Regulations:** What are the relevant statutes and regulations governing this program and information collection? If relevant, which regulations or policies will need to be changed, or have been changed, to achieve the expected burden reduction?

i. **Stage:** A designation of the status of the burden initiative. For example, predevelopment, user-interview and research, testing, design and build, policy sign off, and deployment.

j. **Impacted Population:** What broad groups will be impacted by this initiative, and are there any disproportionate impacts on sub-groups? Please be as specific as possible in detailing sub-groups that may be disproportionately affected by the initiative. Examples of broad groups include individual households; non-profits or other community-based organizations; state, territorial, Tribal, or local governments; and small businesses. Examples of sub-groups might include individuals with disabilities, households headed by a single parent, workers in a particular occupation, low-income households, or minority-owned small businesses.[20]

k. **Population Size:** How many people/businesses/groups are currently covered by this collection? How many will be impacted by this initiative? Where possible, please estimate the size of the affected sub-groups named above.

l. **Current Burden and Estimated Reduction:** An accounting of the current burden of the collection or process, and the estimate of the reduction in burden hours and costs for the entire initiative.

m. **Collection(s) Affected:** A list of the titles and OMB Control Numbers of the collections affected by this initiative.

n. **Milestone Dates:** The projected or actual month and year for the completion of key milestones. For example, “User interviews and research,” “Final project scoping,”

[20] Agencies might consider disproportionate impacts on underserved populations enumerated in Executive Order 13985, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

"System Development and User Testing," "Final policy sign off and submission to OIRA."

o. **Project Lead Contact Info:** The name and contact information for the lead subject matter expert on this project.

Appendix C: Progress Updates on FY 2022 Burden Reduction Initiatives (BRIs)

1. What is the purpose of this Appendix to the data call?

Last year OIRA asked agencies to provide a list of in-progress or upcoming burden reduction initiatives. Many of these initiatives were still in the strategy or early development phases last year. Responses to this portion of the data call will allow agencies to provide a progress report on these initiatives.

2. What types of information are relevant to provide in this progress update?

Updates should include a narrative-style description of how the initiative has progressed over the past year. While the content and detail of these updates will vary, it may include discussion of any procedural developments (*e.g.,* rulemaking, information collection revision), organizational developments (*e.g.,* further details on the system or team working on the project), or qualitative observations or quantitative metrics if the initiative has successfully launched or been made public. Forthcoming milestones and changes to the scope or expected impact should also be noted.

3. How can we locate our FY 2022 BRIs?

In the reporting template entitled "FY23 ICB Reporting Template" is a read-only tab entitled "Reference - FY 2022 BRIs". Agencies are requested to open this list, locate their FY 2022 BRIs, and then copy them into "FY 2022 BRI Update" as described below (#4).

4. What information about these initiatives must we submit?

In the reporting template entitled "FY23 ICB Reporting Template", locate the read-only tab entitled "FY 2022 BRIs (Read Only)". Agencies are requested to filter this list to locate their FY 2022 BRIs and then copy certain listed fields (agency, sub-agency, initiative title, description) directly into the tab entitled "FY 2022 BRI Update". Then, staying in the tab "FY 2022 BRI Update", agencies should complete the remaining fields with the information that we request you respond to.

As a reminder, when you submit your completed template document, we ask that you include your Agency's acronym at the beginning of the file name. For example, "HHS FY22 ICB Reporting Template." These details are provided on https://community.max.gov/x/babjk.

Instructions for Progress Update on FY 2022 Burden Reduction Initiatives
Within the burden reduction initiative template under the tab "FY 2022 BRI Update", we ask that your submission include

a. **Agency:** Your agency name. You should directly copy this from the tab "FY 2022 BRIs (Read Only)".

b. **Subagency:** The subagency responsible for the initiative. You should directly copy this from the tab "FY 2022 BRIs (Read Only)".

c. **Initiative Title:** A title of the initiative. You should directly copy this from the tab "FY 2022 BRIs (Read Only)".

d. **Description:** You should directly copy this from the tab "FY 2022 BRIs (Read Only)". Updates to the description since the last report can be described in the subsequent columns.

e. **Progress Update:** A narrative-style description of how the initiative has progressed over the past year. While the content and detail of these updates will vary, it may include discussion of any procedural developments (*e.g.*, rulemaking, information collection revision), organizational developments (*e.g.*, further details on the system or team working on the project), or qualitative observations or quantitative metrics if the initiative has successfully launched or been made public.

f. **Notable Changes in Scope or Impact:** If the initiative has either expanded or reduce its scope or expected impact since it was reported on last year, indicate so here.

g. **Stage:** Provide any updates to the designation of the status of the burden initiative. For example, predevelopment, user-interview research, testing, design and build, policy sign off, and deployment. Refer to the response your agency provided last year under the tab "FY 2022 BRIs (Read Only)" and update accordingly.

h. **Updated Estimated Reduction:** Provide any updates related to any increases or reductions in the burden reduction relative to what was reported on last year.

i. **Updated Milestone Dates:** Provide any updates to the projected or actual month and year for the completion of key milestones. For example, "User interviews and research," "Final project scoping," "System Development and User Testing," "Final policy sign off and submission to OIRA."

j. **Project Lead Contact Info:** The name and contact information for the lead subject matter expert on this project.

Appendix D: Cross-Cutting or Thematic Special Topics

1. What is the purpose of this Appendix to the data call?

This year, OIRA is interested in learning more about certain cross-cutting approaches to burden reduction, or special topics, which are likely to be relevant to a range of agencies.

These include

- Language access initiatives;
- Mechanisms for personnel to identify or report upwards known burdens or ideas for reducing burden on the public (for example, an agency might have a process for proactively soliciting feedback from "navigators" or frontline workers who facilitate completing applications or other forms); and
- Processes or tools the agency operates to solicit suggestions for burden reduction in information collections beyond the expected Federal Register notice and comment periods (for example, an agency might, on its PRA statement, list a website or email inbox where it receives information collection feedback on an ongoing basis).

2. What types of information are relevant to provide in this progress update?

In the reporting template entitled "FY23 ICB Reporting Template", under the tab "Special Topics", there is a list of fields for the information that we request you submit. All responses should be included within the same template document. As a reminder, when you submit your completed template document, we ask that you include your Agency's acronym at the beginning of the file name. For example, "HHS FY22 ICB Reporting Template." These details are provided on https://community.max.gov/x/babjk.

Instructions for Thematic or Cross-Cutting Initiatives
Within the burden reduction initiative template under the tab "FY 2023 Thematic or Cross-Cut", we ask that your submission include

a. Language Access:

i. Does your agency have a publicly available language access plan? If yes, please provide a link to the most recent version.
ii. Does your agency have dedicated staff responsible for translating forms and notices into non-English languages? If yes, please provide the program name and point of contact.
iii. List all forms or accompanying notices that were translated into non-English languages during FY23.
iv. List all forms or accompanying notices that your agency anticipates translating into non-English languages during FY24.

b. Seeking Feedback from Personnel or "Navigators":

i. Does your agency either employ or fund (such as through grants to third party organizations) "navigators" who are responsible for helping individuals navigate processes associated with forms, including learning about, applying for, or maintaining eligibility for an agency benefit or service?

If yes, please (1) generally describe the scope and role of the supported navigator program(s); and (2) provide a link, if available, to public information discussing the program.

ii. If your agency uses navigators or otherwise employs front-line personnel who support individuals with navigating forms, does it have any formalized mechanism for those personnel to identify or internally report upwards known burdens or ideas for reducing burden on the public? If yes, please describe.

c. Seeking Ongoing Feedback from the Public

i. Please provide the template version of the PRA statement your agency displays on its federal forms.

ii. Does your agency have any mechanism to solicit suggestions for burden reduction in information collections beyond the required Federal Register notice and comment periods? If yes, please describe.

iii. Does your agency operate a website or email inbox where respondents are encouraged to submit feedback on forms outside of the PRA (*i.e.*, Information Collection Request) approval cycle? If yes, please provide it.

iv. If your agency solicits feedback on federal forms outside of the PRA (*i.e.*, Information Collection Request) approval process, does your agency commit to responding to that feedback during the next PRA approval cycle?

v. If your agency solicits feedback on federal forms outside of the PRA (*i.e.*, Information Collection Request) approval process, how does it inform the public about this? For example, does the agency explicitly advertise its openness to ongoing feedback on its forms' PRA statement or a web page?

Appendix E: Violations Report

As in previous ICB data calls, agencies are required to report on violations of the PRA and OMB's regulations implementing the PRA. OMB reminds agencies of the importance of the requirement that a senior agency official certify that PRA standards have been met. Specifically, OMB calls on CDOs to review their procedures to ensure that this certification process is robust.

Consistent with the process of previous ICB data calls, OIRA will provide agencies with a list of an agency's known PRA violations for the reporting years. **Agencies must verify that the information OIRA provides is accurate, correct information that is incorrect, and add any violations that do not appear on the list.**

The preliminary list of PRA violations can be found on https://community.max.gov/x/babjk**.**

Upon review, if the agency believes a violation should be added or removed, they must email the completed Excel document to their OIRA Desk Officer and the ICB Coordinators Kelsi Feltz (Kelsi.L.Feltz2@omb.eop.gov) and Kyle Gardiner (Kyle.S.Gardiner@omb.eop.gov). If the agency has no edits, please send a brief confirmation to your desk officer and ICB coordinators that the agency has reviewed with no comments.

OIRA reports two categories of PRA violations: (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 receive OIRA approval for the information collection request 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 OIRA to renew or discontinue, as appropriate, its approval for a collection prior to the expiration date.

OIRA identifies two types of lapses in renewal or discontinuation: (1) collections that expired during the reporting Fiscal Year and were reinstated after the expiration date during that same year and (2) collections that expired during the Fiscal Year and were not renewed or discontinued before the end of that Fiscal Year. The violation will be reported in the year it improperly lapsed and the year it was renewed.

If an agency has zero known violations for fiscal year 2023, the agency will not appear on the MAX page. If an agency's internal review yields no further violations, please send a brief statement to your OIRA desk officer that the agency reports zero violations.

Appendix F: Resources for Agencies

There are a number of resources that agencies can explore to help identify and design potential burden reduction initiatives. We detail several potential resources here.

- *Tackling the Time Tax: How the Federal Government Is Reducing Burdens to Accessing Critical Benefits and Services* features case studies of specific high-impact initiatives. Agencies are strongly encouraged to review these case studies to understand a variety of policy, technology, and procedural approaches to burden reduction which can serve as a model for future initiatives:
  - **Farm Service Agency Loan Applications** (Department of Agriculture): Cutting the time tax for farm loan applications in half through form simplification and online assistance tools (available at https://www.whitehouse.gov/wp-content/uploads/2023/07/Burden-Reduction-Case-Study-USDA.pdf)
  - **The Evolution of Total and Permanent Disability Debt Discharge** (Department of Education): Improving the student loan debt discharge process for totally and permanently disabled borrowers to automate eligibility determinations for most disabled borrowers (available at https://www.whitehouse.gov/wp-content/uploads/2023/07/Burden-Reduction-Case-Study-ED.pdf)
  - **Streamlining Housing Program Eligibility Processes through Rulemaking** (Department of Housing and Urban Development) Modernizing and streamlining income reviews and eligibility determinations to reduce burden on tenants, Public Housing Agencies, housing owners, and local governments (available at https://www.whitehouse.gov/wp-content/uploads/2023/07/Burden-Reduction-Case-Study-HUD.pdf)
  - **Unemployment Insurance Applications** (Department of Labor): Streamlining the process of applying for and receiving UI benefits for eligible unemployed workers through plain language, partnerships with community organizations, translation, and more (available at https://www.whitehouse.gov/wp-content/uploads/2023/07/Burden-Reduction-Case-Study-DOL.pdf)
  - **Continuing Disability Review** (Social Security Administration): Digitizing, simplifying, and streamlining an essential form for demonstrating continued eligibility for disability benefits (available at https://www.whitehouse.gov/wp-content/uploads/2023/07/Burden-Reduction-Case-Study-SSA.pdf)
  - **A 20 Million Hour Burden Reduction Target** (Department of Homeland Security): Setting—and Meeting—a Department-wide Burden Target https://www.whitehouse.gov/wp-content/uploads/2023/07/Burden-Reduction-Case-Study-DHS.pdf

- The FY 2022 ICB data call includes a summary of potential burden reduction strategies agencies can explore, as well as agency examples from the implementation of the American Rescue Plan Act. These later examples are based on a longer memo available at https://www.whitehouse.gov/wp-content/uploads/2022/12/BurdenReductionStrategies.pdf.

We encourage agencies to bring together relevant program offices, equity leads, research and evaluation specialists, customer experience specialists, stakeholder or community outreach specialists, and PRA officials to help inform potential burden reduction initiatives. Consistent with the guidance in OIRA's memorandum *Broadening Public Participation and Community Engagement in the Regulatory Process*[21] as well as in OMB M-22-10, we also encourage agencies to consider drawing on engagement with members of the public who use, or might be eligible to use, agency benefits and services to better understand the experience of learning about, applying for, and accessing those relevant programs. Agencies might also consider engaging other members of civil society with relevant knowledge or experience, such as outside researchers or individuals or organizations who work with members of the public when applying for benefits, like third-party counsel, community-based organizations, or support networks. Such engagement can help illuminate the nature and impacts of potentially unnecessary burdens, both quantitative and qualitative, and also help the agency develop burden reductions strategies.

[21] Off. of Mgmt. & Budget, Exec. Off. of the President, *Broadening Public Participation and Community Engagement in the Regulatory Process* (July 19, 2023), *available at* https://www.whitehouse.gov/wp-content/uploads/2023/07/Broadening-Public-Participation-and-Community-Engagement-in-the-Regulatory-Process.pdf.