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BY THE COMPTROLLER GENERAL

**Report To The Chairman,  
Committee On Government Operations  
House Of Representatives  
OF THE UNITED STATES**

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**Implementing The Paperwork  
Reduction Act: Some Progress,  
But Many Problems Remain**

The Paperwork Reduction Act of 1980 included objectives of reducing paperwork burdens on the public, minimizing Federal information costs, and achieving savings and improved service delivery through better management of modern information technology. The Office of Management and Budget was charged with these Government-wide responsibilities.

OMB has reported substantial reductions in paperwork burdens. Limited progress has been made, however, in other information resources management areas such as improving the acquisition and use of information technology, overseeing the Federal statistical system, and developing uniform information policies.

GAO believes the limited progress was due in part to the emphasis given regulatory reform activities, which diverted resources from the act. GAO recommends several actions OMB should take and options Congress may wish to consider for achieving more successful implementation of the Paperwork Reduction Act.



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COMPTROLLER GENERAL OF THE UNITED STATES  
WASHINGTON D.C. 20548

B-180224

The Honorable Jack Brooks  
Chairman, Committee on  
Government Operations  
House of Representatives

Dear Mr. Chairman:

This is our report on progress made by the Office of Management and Budget (OMB) in implementing the Paperwork Reduction Act (Public Law 96-511). Our review, made at your request, covers OMB's efforts to implement the act during the period April 1, 1981, through October 31, 1982. Significant events occurring since October 1982 are also noted as appropriate.

As requested by your office, we did not obtain written agency comments on the matters discussed in this report. Also, as arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of the report. At that time we will send copies to the Director, Office of Management and Budget; to interested parties; and make copies available to others upon request.

Sincerely yours,

A handwritten signature in cursive script that reads "Charles A. Bowsher".

Comptroller General  
of the United States



COMPTROLLER GENERAL'S REPORT TO  
THE CHAIRMAN, COMMITTEE ON  
GOVERNMENT OPERATIONS  
HOUSE OF REPRESENTATIVES

IMPLEMENTING THE PAPERWORK  
REDUCTION ACT: SOME  
PROGRESS, BUT MANY  
PROBLEMS REMAIN

D I G E S T

The Paperwork Reduction Act of 1980 established broad objectives for improving the management of all Federal information resources. The act established the Office of Information and Regulatory Affairs (OIRA) within the Office of Management and Budget (OMB) and charged the Director of OMB with Government-wide responsibility for achieving these objectives.

OMB projects that a 29-percent reduction in paperwork burdens will be achieved by October 1983, thus exceeding the act's 25-percent reduction goal. OMB has, however, made limited progress toward achieving other objectives of the act.

PAPERWORK REDUCTION ACT  
OBJECTIVES AND TASKS

The Paperwork Reduction Act established broad objectives and laid out specific tasks designed to work toward achieving those objectives. The objectives and tasks covered a wide range of information resources management activities, going well beyond paperwork burden reduction. The act set the following objectives.

- Reduce the information burden imposed on the public by the Federal Government.
- Reduce the cost of collecting, managing, and disseminating information by Federal agencies.
- Ensure that Federal agencies collect only as much information as needed and can be used effectively.
- Eliminate inconsistencies among Federal information policies by ensuring uniformity wherever possible.

- Improve the efficiency of Government programs and reduce the public burden through the effective use of ADP/telecommunications.
- Ensure that the legitimate privacy and confidentiality concerns of individuals and enterprises are safeguarded.

The act provided specific tasks, some with statutory milestones, to serve as a framework for achieving its objectives. GAO identified 39 specific tasks, including 13 with statutory milestones, as a basis for assessing OMB's progress in implementing the act. These tasks were grouped into the six information resources management functions covered by the act as follows: paperwork reduction, ADP and telecommunications, statistics, records management, information sharing and disclosure, and information policy and oversight.

OMB EXPECTS TO EXCEED  
THE ACT'S BURDEN REDUCTION GOALS

OMB has reported considerable success in reducing Federal paperwork burdens. In January 1983 OMB reported that it had met and in fact exceeded the 15-percent goal for fiscal year 1982. Further, OMB projects it will meet its fiscal year 1983 goal and obtain an overall 29-percent reduction in burden by October 1983, exceeding the act's 25-percent burden reduction goal. OMB reported that the act's goal of reducing Federal grant-related paperwork by 10 percent has also been substantially exceeded.

LIMITED PROGRESS MADE  
IN ACCOMPLISHING MANY  
OTHER TASKS REQUIRED  
BY THE ACT

Limited progress has been made in information resources management areas other than paperwork reduction, such as developing uniform information policies, promoting more effective use of advanced information technology, and overseeing the Federal statistical system. (See pp. 10 to 28.)

The act contains 13 tasks with statutory milestones. Six were to be completed by April 1982 and seven others were to be completed by April 1983. Five of the six tasks with April 1982 milestones have not been completed. These tasks dealt with paperwork reduction and information policy and oversight. One paperwork reduction task was completed on time. Of the seven tasks due to be completed in April 1983, one paperwork reduction task has been completed, two tasks were expected to be completed on time--one in ADP and telecommunications and one in information sharing. The remaining four tasks in information policy and oversight and ADP and telecommunications have received little or no attention.

POLICY AND MANAGEMENT  
DECISIONS CONTRIBUTED  
TO SHORTFALLS IN  
IMPLEMENTING THE ACT

GAO believes the most crucial decision contributing to the shortfalls in completing many of the Paperwork Reduction Act's tasks was assigning OIRA primary responsibility for the Administration's regulatory reform program.

The act provides OIRA neither authority nor resource authorization for performing reviews of regulations except for assessing compliance with the act's objectives for reducing paperwork. In fact, both House and Senate Committee reports on the legislation specifically stated that regulatory reform activities beyond those related to information and paperwork burden issues should not be assigned to OIRA.

The Congress authorized funding for implementing the Paperwork Reduction Act and "\* \* \* for no other purpose." Funds have not, however, been specifically appropriated against this authorization so there is nothing to preclude OIRA from applying its available resources to other activities.

The decision to assign OIRA primary responsibility for the regulatory reform program

resulted in OIRA staff performing thousands of regulation reviews which address regulatory issues far beyond those associated with information or paperwork burden matters. These regulation reviews frequently include paperwork burden issues although their primary purpose is to address the substantive merits of the regulation. Also, regulation reviews bear little relationship to the other information resources management functions covered by the act. As a consequence of its extensive regulatory reform responsibilities, OIRA has not devoted full time to implementing the Paperwork Act. This has contributed to the limited progress in achieving the objectives of the act that do not involve paperwork burden reduction. (See pp. 33 to 40.)

The Paperwork Reduction Act sharply increased OMB's information resources management responsibilities. Duties previously performed by other agencies were shifted to OMB and agencies previously exempt from OMB's paperwork review process were covered by the act. However, OMB has available only slightly more resources to implement the act--and to carry out the regulatory reform program--than were available to OMB and the other agencies combined for a significantly lower workload prior to the act's passage. (See pp. 30 to 33.)

OIRA provided limited prescriptive guidance to agencies for implementing the act. This management approach also has contributed to limited progress. For example, OMB issued insufficient written guidance to agencies for designating their senior officials and for reviewing their information management activities. Consequently, agencies had to make submissions to OMB on a trial and error basis. The limited written guidance made OIRA's work more difficult and drained its resources away from other tasks. (See pp. 40 to 43.)

OMB has not specifically identified and requested the resources needed to implement the act. Consequently, there is no sound basis for the Congress to ensure that adequate resources are applied to achieve the act's objectives.



## RECOMMENDATIONS TO THE DIRECTOR, OMB

GAO recommends that the Director, OMB:

- Identify specifically in the budget program and financing schedule the resources needed for timely and effective implementation of the Paperwork Reduction Act.
- Assess the feasibility of applying a greater portion of the resources currently available to implement the requirements of the act, particularly those requirements having statutory milestones. The results of this assessment should be included in OMB's budget submission.

Additional recommendations to the Director are on page 45.

## MATTERS FOR CONSIDERATION BY THE CONGRESS

GAO suggests three options for the Congress to consider if it decides further action is needed to require OMB to increase the pace of progress toward achieving the Paperwork Reduction Act's objectives. Each of the three options would complement the actions GAO recommends to the Director of OMB. These options are:

- Require OMB to identify the resources needed for fully implementing the Paperwork Reduction Act and report annually on the resources expended for that purpose.
- Provide a separate appropriation for implementing the Paperwork Reduction Act.
- Provide a separate appropriation for implementing the act and amend the act to prohibit OIRA from performing any duties other than those required by the act.

These options, and their advantages and disadvantages, are discussed in detail beginning on page 46.

AGENCY COMMENTS

GAO did not obtain official agency comments on this report. However, GAO discussed the report contents with agency officials and their comments were included where appropriate.

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This review was requested by the Chairman,  
House Committee on Government Operations.

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ABBREVIATIONS

ADP	Automatic Data Processing
ADTS	Automated Data and Telecommunications Service
CFP	Commission on Federal Paperwork
COWPS	Council on Wage and Price Stability
FILS	Federal Information Locator System
GAO	General Accounting Office
GSA	General Services Administration
ICB	Information Collection Budget
ICST	Institute for Computer Sciences and Technology
NARS	National Archives and Records Service
NBS	National Bureau of Standards
OIRA	Office of Information and Regulatory Affairs
ORIP	Office of Regulatory and Information Policy
OMB	Office of Management and Budget
OLC	Office of Legal Counsel, Department of Justice

## G L O S S A R Y

Information resources management	A concept for integrating and focusing a variety of activities on managing information throughout the life cycle--from collection or creation through final disposal--and in each segment of it in furtherance of program and agency objectives. It involves managing data and information in such a way that program and agency managers are able to obtain and use information efficiently, effectively, and economically.
Desk officer	An individual within the Office of Management and Budget who is responsible for the whole of information management for a defined sector of the Federal Government. A desk officer oversees and coordinates the information policy, paperwork, and regulatory activities of the assigned agencies.
Senior official	A person appointed by the agency head to carry out the agency responsibilities assigned in the Paperwork Reduction Act.
Paperwork	Recordkeeping and filing of reports by businesses, individuals, and organizations regarding Federal programs and regulations.
Federal Information Locator System	A system to serve as the authoritative register of all information collection requests by the Federal agencies. A management tool to be used for identifying and eliminating duplication and for controlling paperwork and information burdens.



## CHAPTER 1

### INTRODUCTION

This report, which was requested by the Chairman, House Committee on Government Operations, presents our findings on the Office of Management and Budget's (OMB) progress in implementing the Paperwork Reduction Act of 1980. The act, which addressed a wide range of Federal information resources management issues, was signed by the President in December 1980 and became effective April 1, 1981.

### IMPROVING FEDERAL INFORMATION RESOURCES MANAGEMENT

The Paperwork Reduction Act of 1980 was the result of a growing concern by the Congress that the Federal Government's fragmented policymaking, oversight, and management structure for information activities was inadequate to deal with the information resources management problems of the 1980s. Numerous studies had documented a wide variety of information management problems. The Paperwork Act established a central policymaking, oversight, and management framework, set broad objectives, established paperwork reduction goals, and provided specific tasks and milestones designed to improve the management of all Federal information resources.

#### Why the act was needed

Policymaking, oversight, and management responsibility for Federal information activities had become increasingly fragmented during the 1970s. For example, three different agencies--OMB, GAO, and the Department of Education (ED)--had varying degrees of oversight responsibility for controlling different segments of Federal paperwork burdens imposed on the public. Although three control agencies were involved, over 50 percent of the Federal paperwork burden was not subject to any central review or oversight because of exemptions from the Federal Reports Act--the broadest paperwork control legislation then in existence.

Responsibility for other information activities was scattered throughout the Government. For example, the National Archives and Records Service (NARS) in the General Services Administration (GSA) dealt with records management activities.

Responsibility for implementing the Brooks Act, the basic policy guidance for acquiring and maintaining ADP equipment and services was shared among an OMB policy unit separate from its paperwork control unit, an office in GSA, the Automated

Data and Telecommunications Service (ADTS), and an office in the Department of Commerce's National Bureau of Standards (NBS). Still another office, the Office of Federal Statistical Policy and Standards (OFSPS) in the Department of Commerce, was charged with policymaking, coordination, and oversight for Federal statistical programs. This fragmentation of central management responsibility was generally mirrored in the line departments and agencies by separate units for paperwork control, records management, ADP, statistics, and other information activities.

Studies by the Commission on Federal Paperwork, the President's Federal Data Processing Reorganization Project, and GAO had documented numerous information related problems. These problems covered the entire information life cycle and included issues ranging from excessive paperwork burdens to the need for better management of highly sophisticated ADP systems. For example, in 1977, the Commission on Federal Paperwork estimated that Federal paperwork, both internal and external, was costing taxpayers \$100 billion a year. GAO reported, also in 1977, that over \$100 million in savings was possible when agencies' programs were converted from one computer to another. GAO identified a number of factors which tended to increase conversion costs but estimated that the costs could reasonably be reduced with good conversion planning and practices. GAO made recommendations to both OMB and NBS for Government-wide policy development in this area.

The President's Federal Data Processing Reorganization Project found that the Government had not obtained the leadership from OMB, GSA, and the Department of Commerce needed to employ current information technology to sustain and improve service delivery and control costs. The project reported that the lack of strong central leadership from these three agencies was the root cause of conditions which had led to a progressive deterioration of the Government's ability to exploit and benefit from information technology.

A similar theme ran through many of these studies. That theme was the need for a central policymaking, management, and oversight unit in the Federal Government with sufficient expertise, resources, and authority to come to grips with the many information resources management problems identified.

#### THE PAPERWORK REDUCTION ACT

Drawing on the many studies and recommendations for improving Federal information resources management, the Congress passed, and the President signed in December 1980, the Paperwork Reduction Act. The act affected essentially all Federal information activities, going well beyond those issues related to Federal paperwork burdens on the public.



The Paperwork Act established the Office of Information and Regulatory Affairs (OIRA) within OMB. The Director of OMB was charged with policymaking, oversight, and management responsibility for a wide range of Federal information activities. Many weaknesses in the Federal Reports Act were corrected, and all agency exemptions from OMB's central paperwork control reviews were eliminated.

The Director was required to delegate authority for administering the act and other related information functions to the Administrator of OIRA, but the Director was held accountable for proper implementation. Each agency was required to designate a senior official, reporting to the agency head, with agencywide information resources management responsibilities linked to those of OMB.

Broad objectives for improving the management of Federal information resources were established as follows:

- Coordinating, integrating and, to the extent practicable and appropriate, making uniform Federal information policies and practices.
- Minimizing the Federal paperwork burden for individuals, State and local governments, and others.
- Minimizing the cost to the Federal Government of collecting, maintaining, using, and disseminating information.
- Making maximum use of information collected by the Federal Government.
- Ensuring that automatic data processing and telecommunications technologies are acquired and used by the Federal Government in a manner which improves service delivery and program management, increases productivity, reduces waste and fraud, and reduces the information processing burden for the Federal Government and for persons who provide information to the Federal Government.
- Ensuring that the collection, maintenance, use, and dissemination of information by the Federal Government is consistent with applicable laws relating to confidentiality and privacy.

The act also established goals for reducing Federal paperwork burdens imposed on the public. A 15-percent burden reduction goal was set for October 1, 1982, and an additional

10-percent reduction goal was established for October 1, 1983. The baseline for measuring progress toward these goals was the estimated total burden hours known to exist in December 1980. OMB subsequently established this baseline as 1.48 billion hours.

OMB and, by delegation, OIRA, were charged with responsibility for developing and implementing policy in the information resources management areas of paperwork burden control, statistics, records management, privacy, interagency information sharing, and, with some exceptions, the acquisition and use of automatic data processing and telecommunications technology. OIRA was also required to evaluate and report to selected congressional committees on the agencies' information activities and report annually to the Congress on progress made toward achieving the act's objectives.

The principles of the Brooks Act related to the acquisition and use of ADP equipment and services were reemphasized. However, the basic roles of OMB for policymaking and oversight and GSA for implementation of the Brooks Act were not changed. GSA was also charged with assisting OIRA in conducting triennial reviews of agencies' information activities and in developing standards for record retention requirements imposed on the public and on State and local governments.

#### OMB'S APPROACH TO IMPLEMENTING THE ACT

Many of the responsibilities given OMB by the Paperwork Act were not new. OMB had carried out a variety of information resources management responsibilities for many years. Policy and management decisions have significantly affected progress in implementing the Paperwork Reduction Act. Other developments concerning the scope of the act will also affect the chances for ultimate success in achieving the act's objectives.

#### OMB actions before the Paperwork Act was passed

OMB's organizational structure and management approach for carrying out its information resources management activities have changed several times over the past decade. In 1977, the statistical policy coordination and oversight function was shifted from OMB to the Department of Commerce. This action was accompanied by the shift of several key personnel, including the then head of OMB's unit charged with both paperwork control and statistical policy.

In January 1980, OMB created a new organizational structure and adopted a new management approach designed to cope with a broader spectrum of information and regulatory issues. The Office of Regulatory and Information Policy (ORIP) was established within OMB and charged with carrying out its paperwork control, ADP and telecommunications, and Privacy Act policy and oversight responsibilities. None of these responsibilities were new; however, the ADP, telecommunications, and Privacy Act responsibilities had previously been in a separate OMB unit. ORIP was also given an oversight role in connection with Executive Order 12044, "Improving Government Regulations." However, the substantive reviews of regulations were conducted by individual agencies and by the Council on Wage and Price Stability (COWPS) and not by OMB staff.

ORIP was organized along both functional and agency lines. Three branches were established: Reports Management, Information Policy, and Regulatory Policy. These branches corresponded to ORIP's three broad responsibilities. Staff members within each branch, called desk officers, were charged with overseeing one or more agencies' activities in all three functional areas. To the extent feasible, agency assignments to the branches corresponded to the principal focus of each branch. That is, major regulatory agencies were assigned to desk officers in the Regulatory Policy Branch, paperwork intensive agencies to the Reports Management Branch, and primary ADP/telecommunications users to the Information Policy Branch.

This 1980 reorganization did not directly affect the statistical policy function. These responsibilities continued to be performed by the Office of Federal Statistical Policy and Standards (OFSPS) in the Department of Commerce.

To a large extent, the basic elements of ORIP's organizational structure and management approach have remained in place since passage of the Paperwork Reduction Act. However, two major changes occurred which have significantly affected OMB's efforts in implementing the act. The first was shifting the statistical policy function from Commerce back to OMB. The second was the decision to task OIRA--the successor to ORIP--with primary responsibility for the new Administration's regulatory relief program. This regulatory relief program differs from prior OMB responsibility in that substantive reviews of regulations were now performed by desk officers and other OIRA staff rather than by individual agencies and by staff of a separate organization--COWPS. Desk officers were now faced with a day-to-day workload of reviewing substantive issues in thousands of regulations.

## OMB actions to implement the act

The new Administration, which took office in January 1981 formally established OIRA on January 29, 1981. The staff of the former Office of Regulatory and Information Policy was transferred into OIRA. The statistical policy unit in the Department of Commerce was not formally transferred into OIRA until August 23, 1981.

In February 1981, the President issued Executive Order 12291, "Federal Regulation." This order assigned OMB a major role in reviewing agency regulations. OMB charged OIRA with administering the Executive Order. The order required that executive agencies, except independent regulatory agencies, submit all of their proposed regulations to OMB for review. The independent regulatory agencies were asked to submit their regulations for OMB review but, recognizing these agencies' relative independence from the President, were not required to make submissions. Executive agencies were required to prepare a regulatory impact analysis, including an assessment of costs and benefits and a description of alternative approaches, for all "major rules." Major rules were defined as those likely to result in (1) an annual effect on the economy of \$100 million or more, (2) a major increase in costs or prices, or (3) significant adverse effects on competition, investment, productivity, innovation, or the ability of United States-based enterprises to compete with foreign-based enterprises. The Director of OMB was authorized to order any rule, or set of related rules, to be treated as a major rule.

In addition to its wide range of Paperwork Act responsibilities and its regulatory review responsibilities under Executive Order 12291, OIRA was also given responsibility for (1) providing staff support to the newly created Presidential Task Force on Regulatory Relief, (2) assisting the Small Business Administration in administering the Regulatory Flexibility Act, an act to encourage agencies to utilize innovative administrative procedures that would otherwise adversely affect small businesses, organizations, and governmental bodies, and (3) administering other relevant executive orders, reorganization plans, and circulars.

To perform all these responsibilities, OIRA retained the three branches staffed with desk officers--Reports Management, Information Policy, and Regulatory Policy--and added two new ones. The Statistical Policy Branch was formed to carry out this function, and approximately 15 staff members were transferred from Commerce to staff the branch. The Regulatory Analysis Branch was added and staffed with 19 people transferred from the Council on Wage and Price Stability. The primary responsibility of this Branch was reviewing agencies'

analyses of major regulations under Executive Order 12291. The responsibility for conducting reviews of all other regulations was assigned to desk officers in the Reports Management, Information Policy, and Regulatory Policy branches.

OIRA officials made two key decisions which have significantly affected progress in achieving the act's objectives. The first was to extend its traditional practice of "case-by-case" reviews of agencies' individual reporting and recordkeeping requirements to implementing other elements of the act. The second was to provide only very general guidance to the agencies for implementing the act.

OMB had little or no choice in continuing to use a case-by-case approach for its reviews of agencies' reporting and recordkeeping requirements required by the Paperwork Act and for its substantive reviews of regulations required by the Executive Order. The Paperwork Act does, however, provide OMB authority to delegate to agencies which have demonstrated capability the responsibility for reviewing and approving their own reporting and recordkeeping requirements.

OIRA officials stated they decided to issue minimal guidance to the agencies and monitor progress toward implementing the act by case-by-case reviews for the following reasons.

- Primary responsibility for implementing the act rests with the individual agencies.
- Early emphasis was on review responsibility.
- Government-wide policies and procedures would be issued when needed, but only after experience was gained on what works.
- OIRA was interested in results, not uniformity in process.

In May 1982, OIRA reorganized, shifting four staff members from the Statistical Policy Branch and three staff members from the Regulatory Analysis Branch to the three desk officer branches. The remaining Statistical Branch staff members were reassigned to the renamed Regulatory and Statistical Analysis Division and the Statistical Policy Branch ceased to exist. OIRA stated that this reorganization was designed to enhance its capability to perform its Government-wide statistical policy coordination and oversight responsibilities because the staff members from the old Statistical Policy Branch were assigned as desk officers to agencies heavily involved in statistical activities.

## Other developments affecting implementation of the act

Two other developments have affected achieving the Paperwork Act's objectives. First, the Congress has enacted two exemptions from the act's coverage. Limited exemptions were provided to the Secretaries of Commerce and Interior under amendments to the Marine Mammal Protection Act of 1972, and to the Secretary of Health and Human Services under amendments to the Public Health Services Act.

Second, differing interpretations of the Paperwork Act by OMB and the Department of Treasury led to a June 1982 legal opinion by the Department of Justice's Office of Legal Counsel. This opinion significantly affected OMB's approach to controlling reporting and recordkeeping requirements contained in regulations existing prior to the effective date of the act.

## OBJECTIVES, SCOPE, AND METHODOLOGY

We evaluated OMB's efforts to implement the Paperwork Reduction Act in Washington, D.C. Our objective was to assess the progress made by OIRA in implementing the act. This review was performed in accordance with generally accepted Government auditing standards.

We reviewed OMB guidance documents, memoranda, internal guidelines, and reports. We examined agencies' submissions to OMB designating their senior officials and their information management review plans. We interviewed OIRA senior management officials and desk officers. We also interviewed officials at GSA and the Department of Commerce.

We identified 39 key tasks in the Paperwork Reduction Act to serve as a basis to report upon the status of OMB's progress in implementing the act. Thirteen of the tasks have statutory deadlines and we evaluated OMB's progress in meeting those deadlines.

Our review did not include an assessment of the effectiveness of OIRA's efforts to implement its regulatory reform responsibilities under Executive Order 12291 or the President's regulatory relief task force. Our review covered actions taken by OMB to implement the Paperwork Reduction Act from April 1, 1981, through October 31, 1982. Significant events occurring since October 1982 are noted, as appropriate. Our work did not include assessing the status of agencies' implementation of the Paperwork Act. This issue has been targeted for a subsequent review.

## CHAPTER 2

### SIGNIFICANT PROGRESS IN PAPERWORK BURDEN REDUCTION BUT LIMITED PROGRESS IN MEETING OTHER TASKS REQUIRED BY ACT

OMB has made limited progress in completing many tasks required by the Paperwork Reduction Act. OMB has reported significant progress in meeting the act's paperwork burden reduction goals, but much remains to be done in this area. Varying degrees of action have been taken in other information resources management areas covered by the act, but the results have been limited. Policy and management decisions contributed to the lack of progress.

The status of OMB's efforts to implement the Paperwork Reduction Act is discussed in this chapter. The decisions affecting OMB's progress are addressed in chapter 3.

#### TASKS REQUIRED TO ACCOMPLISH THE ACT'S OBJECTIVES

The act assigned OMB policymaking, management, and oversight responsibility for a wide range of information resources management functions. The act provided specific tasks related to each function. These tasks were designed to provide a framework for achieving the act's broad objectives. The information resources management functions include:

- Paperwork burden reduction.
- ADP and telecommunications.
- Statistics.
- Records management.
- Information sharing and disclosure.
- Information policy and oversight.

We identified 39 key tasks--including 13 with statutory milestones--contained in the act and grouped them into the related information resources management functions. We also identified a seventh function--organizational development and administration--to contain tasks associated with organizational and administrative matters. A chart summarizing the status of all 39 tasks is included as appendix I.

Few tasks with  
statutory milestones  
accomplished

Milestones were established for 13 key tasks, considered to be essential building blocks for successful implementation of the act. Six of these tasks were required to be completed by April 1, 1982--1 year after the act became effective. Seven others were to be completed by April 1, 1983.

OMB has completed only one of the six tasks with an April 1, 1982, statutory milestone--identifying initiatives which would reduce burden associated with Federal grant programs. The remaining five tasks have not been completed.

Some progress has been made on the seven tasks with April 1, 1983, statutory milestones. OMB has completed one task which was to complete actions on the Commission of Federal Paperwork recommendations. Two other tasks--development of an ADP and telecommunications 5-year plan and developing legislation to remove inconsistencies for privacy, confidentiality, and disclosure of information--were expected to be completed on time. However, the remaining four tasks have received little or no attention.

The following chart identifies the tasks with statutory milestones and their related information resources management function.



SUMMARY OF STATUTORY MILESTONES AND THEIR  
RELATED INFORMATION RESOURCES MANAGEMENT  
FUNCTION

<u>Statutory Task and Date</u>	<u>Information Resources Management Function</u>
<u>April 1, 1982</u>	
Identify initiatives to reduce burden associated with Federal grant programs.	Paperwork Reduction
Develop a Federal Information Locator System (FILS) and have it operational.	Paperwork Reduction
Develop a proposal to augment FILS to include major agency holdings.	Paperwork Reduction
Identify areas of duplication in information collection and develop a schedule and methods for its elimination.	Paperwork Reduction
Establish audit standards and requirements for information systems.	Information Policy and Oversight
Assign responsibility for Government-wide and multi-agency information system audits.	Information Policy and Oversight
<u>April 1, 1983</u>	
Complete actions on Commission on Federal Paperwork recommendations.	Paperwork Reduction
Develop an ADP/telecommunications 5-year plan.	ADP/Telecommunications
Develop a program to enforce Federal information processing standards.	ADP/Telecommunications
Revitalize standards development program.	ADP/Telecommunications
Propose legislation to remove inconsistencies for privacy, confidentiality, and disclosure of information.	Information Sharing and Disclosure
Coordinate and make uniform Federal information policies and practices.	Information Policy and Oversight
Identify productivity initiatives using information processing technology.	Information Policy and Oversight

LIMITED PROGRESS IN  
ACCOMPLISHING MANY TASKS  
REQUIRED BY THE ACT

OMB has made limited progress in completing many of the tasks required by the Paperwork Reduction Act. OMB has placed more emphasis on the paperwork burden control tasks of the act and more progress has been made in this category. However, despite efforts that have been made, there has been limited achievement thus far in carrying out tasks associated with the acquisition, maintenance, and management of Federal ADP and telecommunications resources. Statistical policy coordination and oversight tasks have received little attention and the resources applied to this function have been declining. Some preliminary actions have been taken in the records management area. No new policy or guidance has been issued dealing with information sharing, privacy, and confidentiality. Finally, with regard to information policy and oversight, OMB has not developed and implemented comprehensive information resources management policies and practices designed to integrate the various information activities of the Federal Government.

The following sections of this chapter discuss actions taken by OMB in each of the information resources management functions identified above. Actions taken on the 13 tasks with statutory milestones are included.

Paperwork burden reduction--  
progress made, but much remains  
to be done

One of the central themes of the act was to reduce existing Federal paperwork burdens and establish strong central controls over the Federal Government's demands for information from the public. The act set burden reduction goals of 15 percent by October 1, 1982, and an additional 10 percent by October 1, 1983. The base for measuring progress toward these goals was the total estimated paperwork burden known to exist at the end of December 1980. Tasks were specified-- five with statutory milestones--to aid in establishing the control mechanisms needed for long term paperwork burden reduction.

OIRA projected in April 1982 that it would meet the 15-percent burden reduction goal by October 1, 1982. In January 1983 OIRA reported that it had met and in fact exceeded the 15-percent goal for fiscal year 1982. In addition, OMB projected it would meet its fiscal year 1983 goal and attain an overall 29-percent reduction in burden by October 1, 1983,

thus exceeding the act's 25-percent reduction goal. However, basic tools to assist in achieving further paperwork burden reductions are still being developed.

OIRA expects to meet the  
act's burden reduction goals

OMB made a commitment to adopt the burden reduction goals of the act when it added the goals to the planning and budgeting process called the information collection budget (ICB). This control process was implemented about a year before the act became effective. OMB first used the ICB process during fiscal year 1981 to set annual agency burden reduction goals and has monitored agencies' progress through its continuing approval process.

According to OMB, the use of the FY 1981 ICB process resulted in a reduction of burden of approximately 4 percent from the known burden in FY 1980--1.28 billion hours. For the fiscal year 1982 ICB, OMB adjusted the 1980 base to reflect burden imposed by agencies not previously included and changes in use, corrections, and other burdens not accounted for. The new base for purposes of measuring progress under the Paperwork Act became 1.48 billion hours. OMB reported that this figure had been reduced by 17 percent to 1.23 billion hours by October 1982, thus exceeding the act's goal of a 15-percent reduction by that date.

In releasing the 1983 ICB in January 1983, OMB reported that it expects to meet the second year burden reduction goal of an additional 10 percent. OMB projects the burden in the adjusted base will decrease to 1.05 billion hours by October 1, 1983. This represents an overall reduction of 29 percent in the burden known to exist at the time the act was passed. These reported and projected reductions are a major accomplishment in reducing the paperwork burdens on the public. OMB pledged to continue its efforts to achieve further burden reductions.

The Paperwork Act also required OMB to identify initiatives which would achieve a 10-percent reduction of burden associated with the administration of Federal grant programs. The act established a statutory deadline of April 1, 1982 for this task. OMB reported that it met this statutory deadline and substantially exceeded the goal by attaining a 25-percent reduction in reporting by grant recipients in fiscal year 1982. This achievement resulted largely from reduction of extensive grant-related paperwork under the block grant programs.

Followup on recommendations  
of the Commission on Federal  
Paperwork completed

The act set a milestone of April 1, 1983, as the deadline to complete action on the recommendations of the Commission on Federal Paperwork by implementing, implementing with modifications, or rejecting such recommendations. OMB divided this task into three parts and issued reports on each part. The final report was issued in January 1983, 3 months ahead of the statutory deadline.

According to OMB's last report, executive agencies have accepted 461 of 501 recommendations of the Commission on Federal Paperwork, or approximately 92 percent. The report further states that these significant accomplishments represent substantial progress in supporting the Paperwork Commission's objective to recommend changes in policies and practices that impact on reducing paperwork burden imposed on the public by the Federal Government.

Basic tools required for  
continued paperwork  
reduction being developed

OMB has missed the statutory deadline of April 1, 1982, for (1) the development of an operational Federal Information Locator System (FILS), (2) development of a proposal to augment FILS to include major agency holdings, and (3) identification of areas of duplication in information collection requests and development of a schedule and methods for its elimination. Revised guidance on the paperwork control provisions of the act will not be effective until May 1983. These are all tools needed for continued paperwork reduction.

The Paperwork Act required that OMB establish by April 1, 1982, an operational FILS. This automated system was to provide a long needed capability to identify duplication in Federal reporting and recordkeeping requirements. The system also was to serve as an aid to the Congress, the agencies, and the public in locating useful information in the Federal Government's vast information holdings. Although developmental work is now well underway, OMB does not expect to have an operational FILS until October 1983.

The need for a capability to rapidly locate Federal information holdings and to identify duplication and eliminate it in the thousands of Federal information requirements has been recognized for years. Although a great deal of preliminary work on development was done prior to passage of the act, OMB has made slow progress toward establishing an operational FILS. Delays in hiring a project manager and a lack

of funds have contributed to the lack of progress. However, a FILS project manager was hired in December 1981, and work on this project was begun.

Since December 1981, a FILS prototype system has been selected and a steering committee comprised of senior level officials from GSA, the Environmental Protection Agency, and all Departments except the Department of State has been organized. OMB officials and the steering committee meet regularly and deal with policy issues while the Department of Defense, which will run the prototype system, deals with the technical issues. Loading of information into the prototype system is nearing completion. The system will be tested through August or September 1983. According to OMB officials, a fully operational FILS is scheduled to begin in October 1983, 18 months after the statutory deadline.

OMB was directed to develop, by April 1, 1982, a proposal for augmenting FILS to include data profiles of agencies' major information holdings. No progress has been made on this statutory requirement because OMB is waiting until FILS is operational before developing the proposal. As a result, this statutory deadline was missed.

OMB was also directed to identify by April 1, 1982, areas of duplication in information collection and to develop a schedule and methods for eliminating duplication. OMB did not meet this deadline. OMB's efforts to identify duplication are being made in connection with routine information collection reviews. Under this approach, OMB's desk officers must look for duplication, relying on their memories and OMB's automated inventory system. Systematic reviews for duplication will not be made until the FILS becomes fully operational.

On June 17, 1982, we reported to the House Government Operations Committee on OMB's efforts to develop a FILS. We stated that OMB's failure to complete FILS on time had contributed to further delays in implementing the act. We concluded that if progress on developing a FILS does not proceed expeditiously, the results would have an adverse effect on achieving the act's objectives.<sup>1</sup>

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<sup>1</sup>"The Office of Management and Budget's Efforts to Develop and Augment the Federal Information Locator System Have Not Met Congressional Expectations" (GAO/GGD-82-76, June 17, 1982).

Another tool needed in the burden reduction area is basic policy guidance that would assist agencies in implementing the paperwork control provisions of the act. Circular A-40, the existing guidance document, was last revised in 1976. According to OIRA officials, a decision was reached not to revise Circular A-40 until various ideas and interpretations were tried by desk officers and some firm conclusions could be reached on what works best at the agencies. However, the existing Circular A-40 is not much help to agencies who must contact OIRA desk officers to obtain individual guidance, instructions, and interpretations on various items under the act.

In June 1982, OMB issued a draft rule to replace Circular A-40 to agencies for informal comment. As noted earlier, the Department of Justice's Office of Legal Counsel (OLC) issued an opinion on June 22, 1982, which limits the review authority OMB believed it had over reporting and recordkeeping requirements contained in regulations existing prior to the effective date of the act. After reviewing this opinion and the comments received from agencies, OMB revised the draft rule and published it as a proposed rule in the Federal Register on September 8, 1982, for a 45-day public comment period. The new rule incorporated changes in light of the OLC opinion and the agencies' comments on the June draft. The final rule was issued on March 31, 1983, to be effective 30 days after publication in the Federal Register. Thus, two years after the effective date of the Paperwork Act OMB issued the basic guidance document for paperwork burden control.

#### ADP and telecommunications-- limited progress made

The act emphasized OMB's leadership role and established tasks--three of which were to be completed by April 1, 1983 --designed to achieve the act's objectives of improved service delivery, increased productivity, and reduced costs in collecting and processing information.

OMB has made some progress on the tasks required to implement its broad responsibilities for improving the management of ADP and telecommunications resources by the Federal Government. However, policies and practices existing prior to the act have not been revised to incorporate the information resources management concepts the act established. Further, OMB has not provided the leadership and guidance needed by GSA and Commerce to involve these agencies in improving the management of the Federal Government's investment in ADP and telecommunications resources.

The Federal Government is heavily dependent on computers and telecommunications to carry out a wide variety of functions ranging from processing applications for benefits to exploring space. The Government spends over \$10 billion annually on ADP resources. In addition, costs for telecommunications equipment and services were estimated by GAO to be over \$10 billion for fiscal year 1981. The convergence of ADP and telecommunications technologies in recent years has blurred the distinction between the two, thus making the effective management of these costly resources even more difficult and more important.

Under the Brooks Act, (Public Law 89-306), OMB, Commerce, and GSA are collectively responsible for managing agencies' acquisition and maintenance of Federal ADP resources. Overall fiscal and policy control was assigned to OMB. Commerce delegated to NBS the responsibility for providing scientific and technological advice and services to GSA and the agencies and for developing and recommending uniform Federal ADP standards. GSA was given exclusive authority for acquiring general-purpose, commercially available ADP systems for the Federal Government. GSA may delegate this authority to individual agencies.

OMB was given responsibility for overseeing the development of telecommunications policy by Executive Order 12046 in 1978. Commerce's National Telecommunications and Information Administration was given a key role to advise OMB in developing Federal telecommunications policies.

The legislative history of the Paperwork Reduction Act made clear the Congress' dissatisfaction with the Federal Government's management of its ADP and telecommunications resources. Numerous problems were identified, including a lengthy and cumbersome acquisition cycle, individual cases of wasteful procurements, and the failure to effectively use existing ADP and telecommunications resources. However, the principal focus was on the need for strong central leadership in terms of policymaking and oversight from OMB.

Consequently, the Paperwork Act reemphasized the existing responsibilities of OMB, Commerce, and GSA for effective management of Federal ADP and telecommunications resources.

OMB has made little progress in reviewing and revising existing policies for ADP and telecommunications. OMB Circular A-71, issued in March 1965, continues to provide policy guidance to executive agencies for administering and managing ADP resources. Transmittal Memorandum No. 1 to A-71, issued

in July 1978, provides guidance relative to the security of Federal automated information systems.

In February 1981, GAO issued a report to the Director, OMB, titled "Government-wide Guidelines and Management Assistance Center Needed to Improve ADP Systems Development" (AFMD-81-20, February 20, 1981). This report documented numerous problems in the design and development of large, complex, Federal data processing systems and pointed out that better management could have saved almost \$300 million in only 10 of the many systems GAO reviewed. The report, among other things, recommended that the Director, OMB, issue Government-wide guidelines to enable the agencies to take a structured approach to developing ADP systems. The report included a framework of principles and procedures for managing system development.

OMB informally requested GSA's assistance in revising Circular A-71. OMB officials conceded that they believe the lack of specific guidance to GSA caused GSA's proposed revision to be rejected and the entire revision must be redone. As of March 1983, the revised Circular had not yet been issued and, according to OMB officials, revising the Circular is not considered a high priority.

In April 1982, GAO issued a report titled "Federal Information Systems Remain Highly Vulnerable to Fraudulent, Wasteful, Abusive, and Illegal Practices" (MASAD-82-18, April 21, 1982). This report, among other things, recommended that OMB revise Transmittal Memorandum No. 1 to correct deficiencies contributing to serious weaknesses in agencies' automated information security programs. OMB had taken no action on these recommendations as of January 1983.

Little or no action has been taken on the Paperwork Act's statutory requirements that (1) OMB revitalize the Federal information processing standards program and (2) develop a program to strengthen enforcement of the standards program by April 1, 1983. The Institute for Computer Science and Technology (ICST) within NBS has responsibility for developing information processing standards, conducting research in computer technology, and providing scientific and technological advisory services to both OMB and GSA and to the agencies in support of ADP policy development.

OMB officials stated they believed the standards program had been significantly improved prior to passage of the Paperwork Reduction Act. They cited a substantial increase in funding for the program and management improvements designed to focus efforts on more substantive issues. Consequently, they believed revitalization efforts in this area



were not currently needed and that none were planned. However, the ICST fiscal 1984 budget has been reduced to about \$3 million from about \$10 million in fiscal 1983.

OMB has taken no action to strengthen enforcement of the information processing standards because they believe the current enforcement mechanism, which is through the procurement regulations, is sufficient.

However, OMB officials did point to one action they initiated in 1982 to improve the standards program. OMB worked with GSA and Commerce to propose legislation transferring ICST to GSA. However, no congressional action was taken on this proposal during the 97th Congress.

The Paperwork Act established a statutory deadline for OMB, working with GSA, to develop by April 1, 1983, a comprehensive 5-year plan for meeting the ADP and telecommunications needs of the Federal Government. Although OMB began in 1979 to prepare annual 5-year plans for Federal ADP and telecommunications acquisitions, these plans consisted essentially of lists of agencies' planned ADP and telecommunications procurements for each fiscal year. The House Committee report on the bill which became the Paperwork Reduction Act made clear that the plan was expected to be much more than a list of agencies' procurements. The plan was to include an assessment of the information processing resources available to the Government and estimates of future needs. Known and probable trends in information technology were to be highlighted; projected significant events, such as new standards, revised Government-wide policies, and scheduled audits of major systems were to be discussed and their impact assessed. In short, the plan that was required was a plan that would serve as a useful device for the Congress, OMB, the agencies, and industry in working toward improvements in service delivery, productivity, and cost savings from more effective management of information technology.

OMB has expended considerable effort in working with GSA and the National Bureau of Standards (NBS) to develop an improved planning process for ADP and telecommunications. OMB initially worked with GSA on a proposal in which GSA would have done much of the work in developing the 5-year plan with oversight and assistance from OMB. Disagreement between the parties on both the nature of the plan and who would do the bulk of the work resulted in scrapping this approach. GSA made a counterproposal and, in October 1982 agreement was reached among GSA, Commerce, and OMB on the development of a 5-year plan. In November a GSA staff member was detailed to OMB to assist in developing a plan along with one OMB staff member who also retained his desk officer duties. GSA and Commerce further agreed to provide additional staff work to OMB to be incorporated into the plan.

OMB officials stated that they expect to meet the April 1, 1983, milestone for a new 5-year ADP and telecommunications plan, which they believe will be a considerable improvement over past efforts. However, OMB officials told us that the new plan will be limited in scope because of the stringent time constraints. OMB plans to update and improve a 5-year ADP and telecommunications plan annually and discussions are already underway about future plans.

OMB officials told us they have not significantly changed their past practices for reviewing agencies' budget proposals for ADP and telecommunications equipment and services. This process essentially involves OIRA staff and budget examiners on a case-by-case basis, giving attention to proposed major acquisitions or to agencies with a history of problems in developing and acquiring ADP and telecommunications systems.

We noted that OMB Circular A-11 (Revised), which prescribes the material to be submitted by the agencies' for OMB's budget review for Fiscal 1984, deleted requirements for submission of materials explaining and justifying proposed ADP and telecommunications acquisitions. The requirement was retained for agencies to submit materials documenting the results of OMB's budget decisions in terms of approved funding for ADP and telecommunications in the President's budget.

We asked OMB officials if the absence of the agencies' justification material prior to budget review hampered their ability to affect the outcome of the budget process. They explained that the material submitted by the agencies prior to budget review had not been used for making budget decisions, and therefore it had been deleted to reduce the burden on agencies for preparing it.

OMB has made a potentially significant change in its oversight of agencies' ADP and telecommunications acquisitions since passage of the Paperwork Act. This change relates to the act's requirement that OMB review the agencies' information resources management activities every 3 years. As part of its implementation of this requirement, OMB selected 66 agency reviews of various information resources management activities for monitoring.

Several of these studies, currently being conducted by the agencies, involve ADP and telecommunications acquisitions. These studies, if closely monitored by OMB, would provide the potential for improving its oversight of major acquisitions of information technology. We found that for purposes of monitoring OMB was relying on individual desk officers for keeping on top of the reviews performed by their assigned agencies.

In summary, although OMB has made some progress, little improvement has been achieved thus far in the acquisition, maintenance, and management of the Federal Government's ADP and telecommunications resources.

Statistical policy coordination  
and oversight--declining  
resources and little action

OMB has reduced the already limited resources devoted to coordinating and overseeing the Federal Government's decentralized statistical system. The Statistical Policy Branch, previously charged with these responsibilities, has been abolished, and a portion of its resources has been dispersed to other OIRA branches. The remaining Statistical Policy Branch staff has been combined with the staff having primary responsibility for performing regulatory analysis work.

This action was taken during a period of budget cuts affecting many important statistical programs. Further, for the first time in nearly half a century, the Federal Government has no central unit headed by a professionally qualified statistician charged with overseeing and coordinating the statistical activities of some 100 agencies. Consequently, little attention has been given to carrying out the statistical policy functions mandated by the Paperwork Reduction Act.

It would be difficult to overstate the importance of reliable, accurate, and timely statistics to the Federal Government and to the Nation as a whole. Statistics are used by all levels and all types of government institutions, and by essentially all elements of the private sector. Billions of dollars in both the Federal and private sectors are allocated each year on the basis of Federal statistics.

The need for a central unit to coordinate and oversee Federal statistical activities was recognized many years ago. Unlike many other countries, the United States has a highly decentralized statistical system. Today, some 100 separate agencies are involved in the collection, analysis, and dissemination of data for a wide variety of purposes. There is a strong need to establish consistent policies and standards, oversee their implementation, assure efficient allocation of statistical resources, and evaluate overall performance of the statistical system.

For many years prior to 1977, OMB and its predecessor, the Bureau of the Budget, had been responsible for coordinating and overseeing Federal statistical activities. This responsibility was transferred to the Department of Commerce in 1977.

The Congress carefully considered whether or not to relocate the statistical policy responsibility in its deliberations on the Paperwork Act. OMB officials argued that the responsibility should be left in Commerce. They believed that statistical policy coordination and oversight was a demanding and time-consuming responsibility and that combining it with other information resources management functions of the act would result in inadequate attention being given to one or the other.

The Congress concluded that the statistical responsibilities were closely related to the other information management functions in the act and that they should be located in OMB. The House Committee report explicitly charged the Director of OMB and the Administrator of OIRA with ensuring that appropriate resources and attention were devoted to all elements of the act, including statistical policy coordination and oversight.

The Paperwork Act retained the existing statutory responsibilities and charged OMB with broad responsibility for policymaking and oversight of Federal statistical programs. OMB was to develop long-range plans for improving Federal statistical programs, and coordinate through budget reviews the collection, interpretation, and dissemination of statistical information.

A comprehensive planning document, A Framework for Planning U.S. Federal Statistics for the 1980's, had been completed by Commerce's Office of Federal Statistical Policy and Standards (OFSPS) prior to passage of the Paperwork Act. An early task for OMB was to update this long-range planning document, but work has not yet been completed. Existing Department of Commerce statistical policy directives have been under review for possible revisions by OMB for over a year, but have not yet been reissued. OMB published a special analysis of the 1983 budget related to statistical programs in March 1982, but cancelled collecting data for the 1984 budget. This effort has been reactivated and a report is to be issued in 1983. OMB officials told us that they are now trying to gather information on the current condition of statistical programs and develop short range plans. Long range planning will be done later. Also, some work has been done on developing proposed legislation dealing with the confidentiality of statistical information. However, no evaluations of statistical programs have been performed.

The resources applied to OMB's statistical policy coordination and oversight responsibilities have diminished sharply since the Paperwork Act was passed. Prior to the act, Commerce's OFSPS had 25 staff members, some of whom

worked part time. Only 15 of these staff members, including the Chief Statistician, were transferred to OIRA in August 1981. Subsequently, the Chief Statistician left the Federal Government and his position has not been filled. In May 1982, OMB abolished the Statistical Policy Branch and transferred four of its statisticians to desk officer jobs in other OIRA branches. The remaining statisticians were re-assigned to the renamed Regulatory and Statistical Analysis Division.

OMB stated that this reorganization was designed to enhance its ability to carry out its statistical responsibilities because the statisticians designated as desk officers were assigned to major statistical agencies. As discussed earlier, OIRA's desk officers are responsible for overseeing a multiplicity of day-to-day information resources management and regulatory actions. The desk officers' responsibilities are simply not compatible with the longer range work involved in statistical policy coordination and oversight.

There are six statisticians remaining in the consolidated Regulatory and Statistical Analysis Divisions. Not all work full time. Consequently, about 5 staff years of effort are being devoted to carrying out OMB's statistical policy coordination and oversight responsibilities under the Paperwork Act.

OMB has taken other actions affecting Federal statistical programs. These actions include budget cuts affecting key statistical programs; the elimination of the cabinet level Statistical Policy Coordination Committee; and stopping publication of the Statistical Reporter, a monthly journal which had for some 40 years served as a vehicle to coordinate the statistical activities of Federal agencies.

In December 1982 OMB reported to the House Government Operations Committee that its current organizational structure with regard to statistical policy was satisfactory and believed it continues to make good sense. However to make it work more effectively, OMB stated that it would designate a professionally qualified and respected individual to be a full-time head of the statistical policy staff to serve as a chief statistician. Also, OMB stated that it would continue to provide a major informational service--monthly public announcements of release dates for statistical reports--previously included in the Statistical Reporter while it considers whether the monthly publication should be resumed. Finally, OMB agreed to consider the issue of staff resources in the statistical area.

The effects of the diminished staffing for statistical policy coordination and oversight, the reduced funding for statistical programs, and the abolishment of mechanisms for policy development and coordination may not be readily apparent in the short term. However, it is clear that resources needed to operate the mechanisms for maintaining and improving the Federal statistical system have already been eroded.

Records management--some preliminary actions taken

The Federal Government has been plagued for many years with serious deficiencies in records management. Oversight of records management has been ineffective and resources and management attention inadequate. A key objective of the Paperwork Reduction Act was to correct these deficiencies and take advantage of the many opportunities available for savings both to the Federal Government and the private sector by improved records management practices. OMB has taken some action in this area, but limited results have been achieved.

The act gave OMB two principal records management responsibilities. The first, related to the management of Federal records, called for OMB to provide advice and assistance to GSA in carrying out GSA's responsibilities under the Federal Records Act. The Congress recognized the need to integrate records management activities with other information resources management functions, and OMB was required to coordinate records management policies and programs with the other information resources management functions covered by the Paperwork Act.

OMB's second responsibility called for it to work with GSA in conducting studies and developing standards for Federal record retention requirements levied on the private sector and State and local governments. The legislative history of the act clearly illustrated that businesses and State and local governments had no sound basis for determining what records to keep or how long to keep them.

GSA's staff responsible for assisting agencies with records management problems, conducting studies, and making recommendations for improvements in records management practices has been reduced since the act was passed. In fiscal 1980, this staff recommended improved records management practices with estimated one-time savings of about \$1.5 million.

OMB stated in its first annual report on the Paperwork Reduction Act that it was considering alternative strategies

for creating incentives to encourage more efficient use of records management resources. The principal alternative currently being considered is establishment of a revolving fund for agencies to reimburse GSA for the space in which agency records are stored. Although it appears attractive, this alternative may not produce significant savings. Records storage costs comprise such a small portion of most agencies' budgets that they are likely simply to use their own, generally more costly, space for records storage instead of using GSA records centers. The costs for administering such a revolving fund arrangement may also be significant, thereby detracting from its perceived potential for savings.

OMB has taken some preliminary actions with regard to developing Federal records retention standards for the private sector and State and local governments. OMB's initial approach to the problem was to collect data on retention periods for individual recordkeeping requirements submitted for its review by agencies. OMB officials told us that they intended to capture this information in their automated information system and use it as a basis for establishing records retention standards. They also told us that this approach probably would not result in the development of standards for at least 3 years. The length of time required was attributed to (1) the 3-year cycle for reviewing all agencies' reporting and recordkeeping requirements under the act and (2) the low priority assigned to records retention standards development.

Many recordkeeping requirements do not have specified retention periods. In recent testimony the Association of Records Managers and Administrators stated that more than 50 percent of 1,364 readily identifiable recordkeeping requirements did not include meaningful retention periods because either no period was stated or the period stated was "indefinite."

OMB included a guideline for records retention in its proposed regulation to replace Circular A-40. The guideline stated that no Federal agency may require respondents to maintain records for more than 4 years, other than health and medical records, unless the agency can demonstrate that the records are necessary to satisfy a statutory requirement, or to meet some other reasonable need. OMB officials stated that the 4-year retention period was intended only as a baseline from which OMB could work with the agencies on a case-by-case basis whenever an agency requests a retention period longer than 4 years.

OMB officials also emphasized to us that they viewed the establishment of the 4-year retention guideline only as a

starting point in the process of developing retention standards and indicated that a considerable period of time would be required to gain experience with the guideline and carefully think through the nature of whatever retention standards are ultimately established.

OMB's final regulation provided a 3-year record retention guideline. If this guideline is properly enforced and other needed steps are taken, we believe OMB can eventually develop useful records retention standards.

Until fiscal year 1982, a guide to Federal records retention requirements, an annual compilation of retention specifications published by the Federal Register, was available to businesses and State and local governments. However, this guide was eliminated because of budget cuts. The guide had limitations, but businesses told us it was helpful in identifying Federal recordkeeping requirements. Although OMB officials believe that some type of guideline which identified agencies' recordkeeping requirements would be useful to businesses and others, they have taken little action toward its development.

Tasks related to information sharing, privacy, and confidentiality-- actions pending

The Paperwork Act assigns OMB several functions in the privacy area. OMB is to play an oversight role by providing advice and guidance to agencies concerning information security, restriction, exchange, and disclosure. OMB is also to oversee the development of policies, principles, standards, and guidelines on information disclosure and confidentiality and on safeguarding information with security measures. The Paperwork Act established a statutory deadline of April 1, 1983, for OMB to develop and propose legislation to remove inconsistencies in policies for the protection and disclosure of information.

We found that OMB has issued no new policy or guidance in this area. OMB officials told us that one new policy including protected statistical centers was under consideration but not yet finalized. This policy will require legislative change. According to OMB officials, recommendations for administrative and legislative changes will be discussed in OMB's second annual report due in April 1983.



Information policy and oversight--  
limited guidance but  
some oversight performed

A central theme of the Paperwork Reduction Act is that OMB should play a strong role in developing uniform and consistent Federal information policies and vigorously oversee implementation of these policies. The requirement for policy development and strong oversight by OMB was cited many times in the numerous studies which contributed to passage of the act; in both House and Senate Committee reports; and, more importantly, in the act itself. In our view, OMB has not vigorously pursued these objectives.

Written guidance was provided to agencies for designating their senior officials and for developing plans for conducting information management reviews. However, the guidance provided was, in our opinion, inadequate. Further, in both cases many agencies were late in providing the desired products and a great deal of rework was required. This is explained in more detail on pages 41 to 43.

The act requires OMB, with the advice and assistance of GSA, to selectively review, at least once every 3 years, the information management activities of each agency to ascertain their adequacy and efficiency. The results of the reviews are to be reported to the appropriate agency head and to selected Committees of Congress.

In March 1982, almost a year after the act went into effect, OMB announced 66 agency review projects at 26 agencies. It planned to monitor the projects as a major component of implementing the responsibility for evaluating agency information management activities once every 3 years. GSA's assistance was not obtained in either planning or selecting these reviews. GSA was asked to assist OMB in one review at Treasury. OMB's role, except for the Treasury study, consists of monitoring the agencies' efforts, not direct review by OMB staff.

In October 1982 we asked for status information regarding these reviews. Of the 66 reviews, 13 had been completed. The remaining 53 were still being acted on at the agencies. Many products due had not been delivered. Only one report had been submitted to an agency head and no reports had been submitted to congressional committees.

The act established the statutory deadline of April 1, 1983, for OMB to identify initiatives to improve productivity in Federal operations using information processing technology. OMB plans to accomplish this task by evaluating the results of several of the agency review projects discussed above. However, no initiatives have been announced.

The act established two tasks with a statutory deadline of April 1, 1982. Neither task has been completed. OMB was to establish standards and requirements for agency audits of all major information systems. This has not been done. OMB was also to assign responsibility for conducting Government-wide or multi-agency audits. As of April 1983, some but not all assignments have been made.

Another statutory deadline of April 1, 1983, requires OMB to establish a schedule and a management control system to ensure that practices and programs of information handling disciplines are appropriately integrated with information policies. OMB officials told us that this statutory task was not considered a high priority and it was deferred.

#### CONCLUSIONS

Overall, limited progress has been made by OMB in completing many of the tasks assigned under the Paperwork Reduction Act. Statutory milestones for many tasks have not been met and other tasks have received little attention. OMB has placed more emphasis on the paperwork burden control function than on other functions of the act. Considerable progress has been made in reducing paperwork burdens, but much remains to be done. If all the objectives of the Paperwork Act are to be achieved, more effort needs to be given to the tasks in the other information resources management areas covered by the act.

The next chapter discusses the policy and management decisions which we believe have affected progress toward achieving the Paperwork Reduction Act's objectives.

### CHAPTER 3

## POLICY AND MANAGEMENT DECISIONS HAVE CONTRIBUTED TO SHORTFALLS IN ACHIEVING THE PAPERWORK

### REDUCTION ACT'S OBJECTIVES

OMB officials and other Administration officials made policy and management decisions which have hampered efforts to achieve the objectives set by the Paperwork Reduction Act. The act sharply increased OMB's Government-wide information resources management responsibilities. Effective and timely implementation of these responsibilities alone would have been difficult with the limited resources available. Policy decisions, some made before the act became effective, resulted in major regulatory reform responsibilities being levied on OIRA. The lack of progress in implementing the Paperwork Act--in areas other than paperwork burden reduction--is due in part to OIRA's consistent emphasis on these regulatory responsibilities.

OMB has not specifically identified and requested the resources necessary for effective and timely implementation of the act. Our analysis indicates that slightly more resources are available to implement OMB's sharply increased information resources management responsibilities than were being applied prior to passage of the act. Charging OIRA with responsibility for the Administration's regulatory reform program added to an already difficult resource problem.

The limited resources available to OIRA have not been adequate to cope with the many duties assigned to it. Further, OIRA's decisions to provide limited guidance to the agencies and not taking advantage of the act's provisions to delegate some of its workload have contributed to shortfalls in accomplishing tasks required by the act.

### POLICIES ESTABLISHED HAVE AFFECTED IMPLEMENTATION OF THE PAPERWORK REDUCTION ACT

OMB has established policies which have significantly impeded progress toward implementing the Paperwork Act. For purposes of analysis, it is useful to view these policies at two levels. The first kind of policy established by OMB can be termed "operational policy" in the sense that it directly affects the day-to-day operations of both OMB and the agencies. The second kind of policy can be called "strategic policy" because it provides a broad framework for future actions. The two kinds of policies are closely related and overlap considerably, but looking at them separately facilitates an understanding of their implications.

OMB has established two basic operational policies which guide both its day-to-day operations and those of the agencies. The first operational policy OMB established was that it would implement the Paperwork Act primarily by relying on its desk officers to provide guidance to the agencies as opposed to issuing definitive guidance documents. OMB believes this approach is best because of the variances in agency operations and the need to test alternative ways of doing things before issuing Government-wide guidance. In large part, this operational policy is the reason OMB has issued limited prescriptive guidance on the various information resources management categories discussed in chapter 2.

The second operational policy established by OMB is that regulatory reform issues will be given priority over information management issues. This distinction is somewhat blurred by the fact that paperwork burden issues have been--and properly so--incorporated into many aspects of OMB's regulatory reform work. The other information resources management issues covered by the Paperwork Act are generally not susceptible to being addressed in the context of regulatory reform. To a considerable degree, this second operational policy explains why relatively greater success has been achieved in paperwork burden reduction than in other areas covered by the act.

The broad strategic policy established by OMB overlaps and complements the two operational policies discussed above. This policy, articulated in chapter 4 of OMB's April 1, 1982, report on the Paperwork Act, can be called a "market policy" or, as OMB refers to it, an "incentive policy." Essentially, this policy says that OMB will implement its information resources management responsibilities by efforts to create incentives for better management of those resources.

Many efforts have been made in the past to establish market place incentives within governmental activities. Some have been successful; some have not. Whatever the outcome, understanding OMB's policies, both operational and strategic, can contribute to assessing OMB's progress in implementing the Paperwork Reduction Act.

THE ACT SHARPLY INCREASED  
OMB'S INFORMATION RESOURCES  
MANAGEMENT WORKLOAD

Prior to passage of the Paperwork Act, OMB had major information resources management responsibilities. Agencies other than OMB, however, carried out significant responsibilities for paperwork burden control and for statistical policy coordination and oversight. Also, over 50 percent of the total paperwork burden imposed by the Federal Government

was not subject to OMB's paperwork control process because of exemptions from the Federal Reports Act.

The Paperwork Reduction Act shifted to OMB the information policy and control responsibilities previously performed by other agencies. It also eliminated the exemptions from the Federal Reports Act, thus increasing the scope of OMB's paperwork control responsibilities by almost 100 percent. Further, the act gave OMB new information resources management responsibilities and reemphasized existing ones. Effective and timely implementation of its sharply increased information resources management responsibilities under the Paperwork Reduction Act presented a formidable challenge to OMB in light of the limited resources available.

OMB's information resources management  
and regulatory responsibilities prior  
to the Paperwork Reduction Act

OMB carried out numerous information resources management responsibilities prior to passage of the Paperwork Act. These responsibilities included conducting paperwork burden reviews for most executive agencies' reporting and record-keeping requirements, administering the information collection budget process under Executive Order 12174, policymaking and oversight for ADP and telecommunications, and overseeing the Privacy Act.

OMB also played an oversight and support role in connection with Executive Order 12044 on "Improving Government Regulations." OMB monitored the agencies' progress in carrying out Executive Order 12044 and reported on their successes and failures but it did not review the regulations. Reviews and analyses of regulations under this order were performed by the individual agencies and by the Council on Wage and Price Stability (COWPS)--a separate unit in the Executive Office of the President. Thus, the desk officers in OMB were not faced with a day-to-day workload of regulation reviews.

OMB had approximately 30 staff members to carry out its responsibilities.

Information resources  
management activities  
outside OMB's purview

Three other agencies had paperwork burden control, policy, and oversight responsibilities prior to passage of the Paperwork Reduction Act. These agencies and their responsibilities included the following:

- GAO reviewed the reporting and recordkeeping requirements of independent regulatory agencies.
- The Department of Education reviewed education-related reporting and recordkeeping requirements of all executive agencies.
- The Office of Federal Statistical Policy and Standards in the Department of Commerce developed policy and provided coordination and oversight for the Federal Statistical system.

A total of approximately 40 staff years annually were expended by the three agencies in carrying out their responsibilities. Combined with the 30 staff members in OMB, a total of approximately 70 staff years were allocated to performing various information resources management policymaking and control functions. With one partial exception, the functions previously performed by agencies other than OMB were transferred to OMB by the Paperwork Act. OMB was given final approval authority for education-related reporting and recordkeeping requirements; however, the Department of Education retained initial review responsibility for such requirements.

Another major area of Federal information collection was not covered by OMB or any other central control agency. The Internal Revenue Service (IRS), some other Treasury agencies, and the bank regulatory agencies were exempted from OMB's paperwork burden review process by the Federal Reports Act of 1942. IRS imposes the largest paperwork burden of any single agency in the Federal Government. The burden from IRS' information collection activities was estimated to be about equal to the total burden from all other agencies subject to OMB's paperwork control process prior to passage of the Paperwork Reduction Act. OMB stated in its first annual report on the act that the number of agencies' requests for paperwork approvals increased significantly during the first year, primarily due to the requests of agencies previously exempt from OMB review.

#### OMB's responsibilities under the act

As discussed above, the Paperwork Act consolidated in OMB all of the information resources management responsibilities previously performed by other agencies. The act also removed all exemptions from the Federal Reports Act. This action, according to OMB, caused an increase of about 250 percent in the number of agency requests for approval during the first year over each of the preceding 2 years.

Further, the act called for OMB to reemphasize and strengthen its existing policymaking and oversight responsibilities and added new ones in the area of records management.

OMB's--and therefore OIRA's--information resources management responsibilities under the Paperwork Reduction Act can be summarized as follows:

- Reviewing reporting and recordkeeping requirements of all Executive Branch agencies comprising a total estimated paperwork burden of about 1.5 billion hours.
- Developing, designing, and operating the Federal Information Locator System.
- Policymaking and oversight responsibility for Federal ADP and telecommunications.
- Policymaking, coordination, and oversight for the Federal statistical system.
- Policymaking and oversight for disclosure of information, confidentiality, and information security.
- Policymaking and oversight for Federal records management activities.
- Developing, implementing, and overseeing uniform and consistent Government-wide information resources management policies, principles, and standards.

This list of OMB's responsibilities reflects only the broad scope of its duties under the Paperwork Act. As discussed in Chapter 2, the act provides many specific tasks designed to achieve the act's objectives. As of October 1, 1982, OMB had 75 staff members in OIRA. This was slightly more than the total number previously assigned by OMB and the other agencies to carry out a substantially lower level of information resources management and regulatory oversight functions prior to passage of the act.

OIRA ASSIGNED RESPONSIBILITIES  
OTHER THAN IMPLEMENTING THE  
PAPERWORK REDUCTION ACT

The Congress established OIRA for the express purpose of implementing the Paperwork Act although OIRA was not prohibited from undertaking other responsibilities. The legislative history in both House and Senate Committee reports recognized that OIRA had a role in reviewing the information management and paperwork burden aspects of regulations.

However, both Committee reports explicitly stated that regulatory reform functions beyond reviews of the information and paperwork burden aspects of regulations were not to be assigned to OIRA because of the concern that such duties would dilute the information resources management responsibilities assigned by the act.

OIRA would have faced a difficult challenge if it had focused all of its available resources and attention on carrying out the responsibilities Congress gave it under the Paperwork Act.

The following sections discuss the regulatory reform responsibilities assigned to OIRA and assess their resource implications for achieving the Paperwork Reduction Act's objectives.

#### Regulation reviews under Executive Order 12291

In February 1981, the President issued Executive Order 12291 titled "Federal Regulation." The purpose of the order was to reduce the burden of both existing and newly proposed regulations, increase agency accountability for regulatory actions, provide oversight and minimize duplication and conflict between regulations.

Executive Order 12291 sharply changed OMB's--and the then newly formed OIRA's--role from that played under Executive Order 12044. As noted earlier, OMB monitored and reported on agency regulation reviews under Executive Order 12044. The new order required OMB to review all regulations before publication and the agencies to refrain from publication until they received OMB's formal written comments. The order also required that OMB review regulatory impact analyses which were to be prepared by the agencies on major rules.

Executive Order 12291 established criteria for the agencies to follow in developing regulations and for OMB to enforce through its reviews. These criteria include:

- Rulemaking shall be based on adequate information.
- Net benefits shall be maximized.
- Potential benefits shall outweigh potential costs.
- The least costly regulatory alternative meeting a given objective shall be chosen.



--The condition of the national economy and of particular industries, as well as the effect of other regulatory actions contemplated for the future, shall be considered.

Besides establishing these generally new and more rigorous standards, the Executive order conferred a variety of powers on OMB, including the authority to

--prescribe procedures for agencies to follow in conducting their regulatory impact analyses, including specifying any particular data that the agency must obtain and consider;

--designate any rule or set of rules as a major rule, thus requiring that a regulatory impact analysis be prepared for it;

--waive any requirements of the Executive order for any rule or class of rules, thus allowing a rule to be issued expeditiously when desired;

--designate existing rules for review and establish schedules for their review; and

--extend the review of final rules and regulatory impact analyses beyond the 30 days provided for in the Executive order.

OMB was also made responsible for prescribing criteria for designating major rules, coordinating implementation of the Executive order with the Paperwork Reduction Act, identifying conflicts and overlaps among different agencies' rules, specifying a format for regulatory agendas, doing exploratory work toward a regulatory budget, and reviewing proposed regulatory legislation advanced by the agencies.

As evidenced by the criteria in Executive Order 12291, OMB's reviews of regulations are much broader in scope and go far beyond issues associated with paperwork burdens imposed by reporting and recordkeeping requirements. The Paperwork Act provided OMB authority only to review and approve or disapprove reporting and recordkeeping requirements in regulations. These reviews are based on whether the information requested by the reporting and recordkeeping requirements is needed by the agencies and will be used in carrying out their functions. The act provided OMB with no authority or responsibility for addressing other, more substantive regulatory issues.

In practice, however, there is a degree of overlap with OMB's regulatory reviews under the Executive order and its

paperwork burden reviews under the Paperwork Reduction Act. Paperwork burden issues have been addressed in connection with reviews of more substantive regulatory matters and, although the two types of reviews are accounted for separately, they are largely performed by the same staff.

OIRA was assigned responsibility for administering Executive Order 12291. The independent regulatory agencies were asked--but not required--to submit their proposed regulations for OIRA review, thus recognizing these agencies' relative degree of independence from Presidential authority.

The executive agencies were required to prepare and submit for OIRA review a detailed regulatory analysis on major regulations. Major regulations were defined as those having a potential impact of \$100 million annually or more on the economy. Nineteen staff members were transferred to OIRA from the former Council on Wage and Price Stability and charged with reviewing the agencies' regulatory analyses on major regulations. The responsibility for conducting reviews of all regulations other than those defined as major ones fell on OIRA's desk officers in three other branches. The Regulatory Analysis Branch monitored and coordinated with desk officers the reviews of major regulations.

The decision to assign OIRA regulatory review responsibilities under Executive Order 12291 has had a major impact on the availability of resources for implementing the Paperwork Reduction Act. The time OIRA has expended in conducting regulatory reviews under the Executive Order has been time taken from efforts to accomplish other tasks required by the Paperwork Act.

OIRA charged with responsibility  
for Presidential Task  
Force on Regulatory Relief

In addition to its regulatory review responsibilities under Executive Order 12291, OIRA was charged with responsibility for support of the Presidential Task Force on Regulatory Relief. This task force, chaired by the Vice-President with several cabinet-level officials as members, was established by the President in January 1981. The Executive Director of the task force is the Administrator of OIRA.

The purpose of the task force is to identify and conduct detailed reviews of selected regulations believed to be excessively costly, complex, or otherwise burdensome on the economy or society at large. Excessive paperwork burdens were included in the task force's charter.

No central staff, other than OIRA, was established to carry out the regulation review work of the task force. OIRA has played a major role in extensive reviews of some 119 existing major regulations. Reflecting the overlap of regulatory and paperwork burden issues, OMB has reported both cost savings and substantial paperwork burden reductions as a result of these reviews.

Initially, OIRA's Regulatory Analysis Branch provided most of the OIRA staff support to the President's task force. However, in May 1982, OMB officials, concerned that the task force's regulation reviews were proceeding slowly--we were advised that only about 20 percent of the reviews targeted had then been completed--decided to shift responsibility for these reviews from OIRA's Regulatory Analysis Branch to the desk officers in three other branches. This shift of responsibility was accompanied by a reorganization resulting in the transfer of seven staff members from the Statistical Policy and Regulatory Analysis Branches to desk officer roles in the three branches. The Regulatory Analysis Branch and the Statistical Policy Branch were combined and renamed the Regulatory and Statistical Analysis Division.

This reorganization was explained by OMB as an effort to enhance its capability to address statistical issues by placing analysts in desk officer roles relating to agencies with major statistical responsibilities. In our view, OMB's statements regarding this reorganization lack credibility because the reorganization was accompanied by an intensive, and apparently successful, effort by the three branches--now buttressed by additional skilled analysts--to complete at least 80 percent of the regulatory reviews identified by the President's task force by the end of September 1982.

In other words, resources were drained, at least in part, from work on the tasks of the Paperwork Act to satisfy the regulatory review requirements established by the Presidential Task Force on Regulatory Relief.

OIRA has consistently emphasized regulation reviews rather than fully implementing the Paperwork Reduction Act

Throughout its relatively short existence, OIRA has consistently emphasized its regulatory reform responsibilities. This emphasis is illustrated primarily by the assignment of responsibilities outside of those specifically authorized by the Paperwork Act to an office specifically created to perform the tasks assigned by the act. It is also illustrated by a comparison of the number of regulatory reviews with the

number of paperwork burden reviews performed by OIRA and by the emphasis given to regulatory reviews following initial oversight hearings on the Paperwork Act.

We attempted to determine the relative amount of time expended by OIRA's desk officers on regulatory reviews and Paperwork Reduction Act responsibilities. We were unable to develop quantitative data to compare the time expended on the two efforts because OIRA does not maintain staff time records accounting separately for these activities.

However, other data were available which we believe demonstrate the effects of OIRA's regulatory review responsibilities on the resources available to implement the Paperwork Act. Since Executive Order 12291 became effective on February 17, 1981, through September 30, 1982, OIRA conducted 4,812 regulatory reviews. (See app. II.) Also, as mentioned earlier, OIRA was involved in reviews of 119 existing regulations identified by the Presidential Task Force on Regulatory Relief. By contrast, from April 1, 1981, through September 30, 1982, OIRA conducted 6,674 reviews of agencies' reporting and recordkeeping requirements under the Paperwork Act. (See app. III.)

As discussed in the preceding sections, in some cases paperwork burden issues are included as part of a more comprehensive regulatory review. However, paperwork burden reviews are only one of the many information resources management tasks assigned to OIRA under the act. As chapter 2 shows, many of the other tasks were not receiving sufficient attention.

Another point corroborating the priority given to regulatory matters by OIRA relates to the recent emphasis given to completing reviews of regulations identified by the Presidential Task Force on Regulatory Relief. Hearings were held on progress being made toward implementation of the Paperwork Reduction Act in October 1981 by the House Subcommittee on Legislation and National Security, Committee on Government Operations, and in April 1982 by the Senate Subcommittee on Federal Expenditures, Research and Rules, Committee on Governmental Affairs.

In both hearings, testimony was presented by GAO and others indicating the need to give increased attention to implementing the Paperwork Reduction Act. Despite the evidence presented in these hearings of missed milestones and other critical tasks falling behind schedule, OMB decided, during the period May through September 1982, to give top priority to conducting reviews of regulations identified by the Presidential Task Force on Regulatory Relief. We recognize that in many cases, these reviews included matters related to reducing paperwork burdens on the public. Their

primary purpose, however, was directed at the broader issue of regulatory reform of which paperwork reduction is frequently a part.

OMB has not identified  
resource requirements for  
implementation of the Paperwork  
Reduction Act

OMB has not separately identified or requested the resources it believes would be needed for timely and effective implementation of the Paperwork Reduction Act. Similarly, OMB has not separately identified or requested resources needed to carry out its regulatory reform responsibilities under Executive Order 12291 and in support of the Presidential Task Force on Regulatory Relief. OMB officials have stated that adequate resources are available to OIRA. We believe the lack of progress toward implementing the Paperwork Act suggests otherwise.

In April 1982, OMB officials stated that OMB's responsibilities under the Paperwork Act and Executive Order 12291 are intertwined, both in terms of staff and use of funds. OMB views its current resource levels to be adequate to meet the statutory requirements of the act. As stated in chapter 2, many of the act's tasks have received little attention. Therefore, we believe OMB should identify resources needed to fully implement the act and request those specific resources from the Congress.

In passing the Paperwork Reduction Act, the Congress authorized amounts for fiscal years 1981, 1982, and 1983 for implementing the act " \* \* \* and for no other purpose." The authorizing language does not, however, require the appropriation of a specific amount for implementing the act. The language only establishes a ceiling on the amount which may be appropriated for such activities.

The following chart compares the maximum amounts authorized by the Congress for implementing the Paperwork Act with OMB's budget requests for all of its information and regulatory affairs activities for fiscal years 1981, 1982, and 1983.

Comparison of Paperwork Reduction Act Authorization  
And OMB Budget Requests For  
Information and Regulatory Affairs Activities  
(Millions of Dollars)

	<u>FY1981</u>	<u>FY1982</u>	<u>FY1983</u>
Congress' authorized ceiling	\$ 8.0	\$ 8.5	\$ 9.0
OMB budget request (actual)	<u>4.3</u>	<u>4.5</u>	<u>5.1</u>
Difference	<u>\$ 3.7</u>	<u>\$ 4.0</u>	<u>\$ 3.9</u>

The Congress' authorization for implementing the Paperwork Reduction Act was based, in part, on a GAO analysis of the estimated resources required. This analysis, submitted in March 1980 and based on H.R. 6410, the House version of the bill which became the Paperwork Reduction Act of 1980, concluded that about 120 positions would be required for effective and timely implementation of the act.

On October 1, 1982, OMB had on board a total of 75 staff members to implement all of the information resources management functions required by the act. These 75 staff members are also charged with carrying out the wide-ranging regulatory reform program discussed earlier in this chapter.

In summary, OMB has available slightly more resources to implement the Paperwork Reduction Act and carry out a regulatory reform program than the total number previously assigned by OMB and the other agencies combined to carry out significantly fewer information resources management responsibilities prior to the act's passage. OMB's paperwork burden control responsibilities alone were sharply increased by bringing IRS' information collection requests under OMB's review--not to mention the additional policymaking and oversight responsibilities for other information resources management activities contained in the act.

OIRA'S MANAGEMENT APPROACH HAS  
CONTRIBUTED TO SHORTFALLS  
IN ACHIEVING THE PAPERWORK  
ACT'S OBJECTIVES

OIRA's management approach to implementing the Paperwork Reduction Act has contributed to the drain on its resources created by the policy decisions discussed above. OIRA officials chose to use a case-by-case "transaction oriented" approach to implement the act. As a corollary to this approach, OIRA decided to provide only limited guidance to

the agencies for performing the critical roles assigned to them by the act. This contributed to increased workload and delays in implementing key requirements of the act. Further, OIRA has failed to take full advantage of the act's provisions allowing it (1) to obtain resources from other agencies to work toward achieving the act's objectives and (2) to delegate some of its day-to-day review responsibilities to the agencies.

Lack of definitive guidance  
has hampered progress on  
key requirements of  
the Paperwork Act

OIRA's decision to provide the agencies only general guidance for carrying out their responsibilities under the act has contributed to (1) an increased review workload for OIRA's desk officers and (2) delays in implementing key elements of the act. We believe OIRA should provide more definitive guidance to the agencies. This step would lessen OIRA's case-by-case review workload in areas other than paperwork and regulations by eliminating the need for agencies to make submissions essentially on a trial and error basis and enhance the agencies' ability for timely implementation of their responsibilities.

Three key requirements of the Paperwork Reduction Act are (1) requiring the designation of a senior official in each agency reporting directly to the agency head, accountable for implementing the agency's responsibilities under the act, (2) charging each agency with periodically reviewing its own information management activities, and (3) charging OMB with selectively reviewing, at least once every 3 years, each agency's information management activities.

OIRA initially drafted a relatively comprehensive and detailed document, labelled Bulletin 81-X, to provide guidance for the agencies in implementing the first two requirements. The draft Bulletin 81-X was discussed with some agencies. However, OIRA decided that it was excessively detailed and could unduly constrain agencies' implementation efforts. Consequently, OIRA issued very general formal guidance, identified as Bulletin 81-21.

Bulletin 81-21 required each agency to submit to OIRA by July 1, 1981, the name and title of its designated senior official, an organization chart identifying the resources assigned or to be assigned, a description of the senior official's authority and responsibilities, and copies of any implementation documents.

The agencies' initial responses for establishing senior officials to implement the act were, in our opinion, inadequate in terms of compliance and timeliness. Less than half met the July 1, 1981, deadline and only about one-fourth initially provided all the documents requested. Some designated senior officials did not report to the agency head, as required by the act. Many of the agencies' responses did not clearly delineate the senior officials' responsibilities.

OIRA's desk officers were tasked with conducting a detailed review of 27 agencies' submissions concerning designation of their senior officials and related management structures. The criteria used by the desk officers in conducting the evaluation was a checklist based on the detailed items in draft Bulletin 81-X.

OIRA's reviews included extensive discussions with agency officials to obtain the necessary information. It took OMB almost 4 months to assure itself that virtually all agencies had appointed a senior official and established a management structure consistent with the act's requirements. We believe that much of this information could have been identified and called for in OIRA's initial guidance document to the agencies.

Essentially the same approach--with essentially the same results--occurred in connection with OIRA's efforts to obtain acceptable plans for agencies' reviews of their information management activities. Bulletin 81-21 required each agency to submit a description of its information activities, a list of such activities it proposed to review, and the criteria it would use to assess the effectiveness, efficiency, and appropriateness of its information activities. No other formal guidance was provided the agencies before the September 1, 1981, due date for submitting the information management review plans to OIRA.

OIRA's desk officers were tasked with evaluating the agencies' information management review plans. Beginning on September 25, 1981, and extending through December 28, 1981, five guidance memos were issued to OIRA's desk officers providing them with criteria for evaluating the agencies' submissions. In other words, the desk officers began receiving written guidance on September 25 on what was supposed to have been submitted by the agencies on September 1. OIRA officials told us this guidance was informally communicated by the desk officers to their respective agencies, as necessary.

We found that over 70 percent of the agencies failed to meet the September 1, 1981, deadline for submitting information management review plans. In October, OIRA provided some



agencies with an example of one agency's plan as a model to follow. Nevertheless, more than half of the agencies had to submit two or more plans before OIRA concluded that they were acceptable.

The agencies' plans included over 200 information management activities for review. In March 1982, OIRA selected 66 of these projects, involving 26 agencies, for monitoring as part of its triennial review responsibility.

Various reasons may have contributed to the problems with the agencies' submissions. However, we believe many of these problems could have been alleviated had OIRA provided the agencies with timely, clear-cut guidance on what was required. The lack of guidance made OIRA's task more difficult as the desk officers had to review and re-review agencies' submissions. Thus, resources were drained from other work, thereby contributing to delays on other elements of the act.

We agree that a management approach which requires the agencies to submit cases--or transactions--for OIRA's review can be an effective implementation tool. However, requiring the agencies to make submissions essentially on a trial and error basis, as is the case when they have no definitive guidance on what they are to submit, is not effective. We believe that in its future implementation efforts, OIRA should provide the agencies with guidance clearly defining what is expected of them.

OIRA has made limited  
use of other agencies'  
resources

The Congress, recognizing that under the best of circumstances OIRA would have limited resources for implementing the act and recognizing that other executive agencies have personnel with expertise in information resources management, authorized OMB to draw on such resources as needed for OIRA. In addition, the act specifically required certain tasks to be performed in consultation with GSA. Only limited use has been made of these provisions of the act.

Some detailees from other agencies and a few Presidential Management Interns were obtained. These personnel were used primarily for reviewing agencies' proposed information collection requests. One detailee was assigned to complete followup work on Commission on Federal Paperwork recommendations. Another was assigned to assist OMB in monitoring a group of agency information management reviews, and a third was recently assigned to assist OMB in developing a 5-year ADP and telecommunications plan required by the act.

However, little use has been made of the expertise and experience in ADP, telecommunications, and records management residing in GSA and the Department of Commerce.

We fully recognize that executive agencies have experienced budget cuts since the act became effective and that experienced personnel resources are in short supply. Nevertheless, we believe OIRA should have drawn on the expertise in other agencies to begin work on some of the tasks required by the act. Using resources from several agencies on a short-term or part-time basis would have assisted OMB in working on tasks falling behind while not damaging the programs of any one agency. Also, more use of the resources of GSA and the Department of Commerce could be made.

Criteria for delegating  
reviews of information  
collection requests not  
developed

A key provision of the act--Section 3507(e)--allows OIRA to delegate authority to an agency senior official to review and approve the agency's information collection requests, when specified conditions are met, without further OIRA review. This would enable OIRA to focus its efforts on Government-wide policymaking and oversight activities directed toward achieving the act's objectives. OIRA has not, however, developed criteria for making such delegations.

OIRA could not have been expected to make delegations of its review authority prior to gaining some experience under the act. However, we believe that OIRA should develop the criteria for such delegations so the agencies can begin to develop the necessary controls and procedures to review and approve their own information collection requirements.

CONCLUSIONS

OMB has made significant progress in reducing paperwork burdens imposed on the public by the Federal Government. However, many other information resources management tasks required by the act have received little attention. As discussed in chapter 2, many statutory milestones have been missed and other tasks have been deferred.

Policy decisions made by OMB officials and other Administration officials gave OIRA the leadership role in implementing a wide-ranging regulatory reform program. Carrying out its regulatory reform responsibilities has detracted substantially from OIRA's ability to achieve the Paperwork Act's objectives other than those for paperwork burden reduction.

OMB's management approach has also contributed to shortfalls in accomplishing the act's objectives. The lack of clear-cut guidance to the agencies has resulted in delays and the necessity for extensive rework. This, in turn, has increased the workload on OMB's desk officers as they struggled to cope with literally thousands of individual paperwork and regulation reviews.

OMB can also make better use of the resources available by providing clear-cut guidance to the agencies for carrying out their responsibilities under the act. Greater use of other agencies' resources, including the information resources management expertise in GSA and Commerce, could also facilitate accomplishment of tasks required by the act.

We believe that continued emphasis on regulatory reform issues with the current resource allocation will inevitably result in further delays in achieving the savings, improved service delivery, and increased productivity envisioned by the Paperwork Reduction Act.

RECOMMENDATIONS TO THE  
DIRECTOR, OMB

We recommend that the Director, OMB:

- Identify specifically and include in the budget program and financing schedule the resources needed for timely and effective implementation of the Paperwork Reduction Act.
- Assess the feasibility of applying a greater portion of the resources currently available to implementing the requirements of the act, particularly those requirements having statutory milestones. The results of this assessment should be included in OMB's budget submission.
- Direct OIRA to provide clear-cut guidance to the agencies for implementing their responsibilities under the act.
- Direct OIRA to develop a plan, including specific milestones, for accomplishing tasks specifically requiring the involvement of GSA and Commerce.
- Direct OIRA to make appropriate use of other agencies' expertise in accomplishing tasks required by the act.
- Direct OIRA to develop criteria for delegation of clearance authority to qualified agencies and work with the agencies so that delegations can be granted.

MATTERS FOR CONSIDERATION  
BY THE CONGRESS

OMB has not specifically identified and requested the resources needed for effective and timely implementation of the Paperwork Reduction Act. Consequently, the Congress has had no sound basis to:

- (1) decide on a specific level of resources it wishes applied to implementing the act or,
- (2) assess progress in implementing the act in relation to the level of resources expended.

Various options are available to the Congress to enhance progress toward achieving the act's objectives. Three which we believe merit consideration are discussed below.

Option 1. The Congress could require OMB to (1) specifically identify the resources needed for fully implementing the Paperwork Reduction Act, and (2) report annually on the resources expended for that purpose. These actions could be taken either in connection with OMB's next annual budget request or required as part of OMB's next annual report under the Paperwork Act.

This action would, over a period of time, provide Congress with a sound basis for deciding on the level of resources it wishes applied to implementing the act and to assess the progress made in relation to the resources available. However, this option has two disadvantages.

The principal disadvantage is that it would be at least 1 year before OMB could provide the Congress with meaningful information on the resources expended toward achieving the act's objectives. In the interim, many tasks required by the act may continue to receive limited attention.

A second disadvantage of this option relates to the previously noted overlap between OIRA's reviews of regulations in connection with Executive Order 12291 and the Presidential Task Force on Regulatory Relief, and its paperwork burden reviews under the act. Although OMB keeps separate records of the number of regulatory reviews and the number of paperwork burden reviews it performs under the act and the staff assignments for each review, it does not account separately for the time expended on each type of review. To the extent that the two types of reviews are performed simultaneously, accounting separately for the time expended could be difficult. This problem would, however, arise only in connection with OIRA's paperwork burden reviews under the act. OIRA's

resource expenditures on the other information resource management requirements of the act would not be difficult to identify because they are not directly related to OIRA's regulatory review work.

Option 2. The Congress could, through the appropriations process, provide separate funding for implementing the Paperwork Reduction Act. This option would allow the Congress to decide the level of resources it wishes applied to working toward the act's objectives and would provide reasonable assurance that the funds appropriated were actually applied.

This option, similar to the first one discussed above, would require OIRA to separately account for the resources expended on the Paperwork Act and on those expended on its regulatory reform activities. Accurately accounting for such resource expenditures would be more critical than under the first option, however, because there would now be a legal responsibility to ensure that funds appropriated for the act were not expended on other purposes. As noted earlier, in practice there is overlap between paperwork burden reviews and substantive regulation reviews. This overlap could pose problems in precise allocation of staff time under this option.

Option 3. The Congress could provide a separate appropriation for implementing the Paperwork Reduction Act and amend the act to prohibit OIRA from performing any duties other than those required by the act.

This option would ensure that the resources appropriated by the Congress are applied to implementing the act. On the other hand, it would require OMB to establish a separate unit to perform the regulatory reform activities required by Executive Order 12291 and the Presidential Task Force on Regulatory Relief.

This option would not present the problems in accounting for staff time noted in option 2, above. However, because of the overlap between substantive regulation reviews and paperwork burden reviews, close coordination between the two units would be required.

We would be happy to work with the appropriate Committees in drafting language to implement any of the options discussed above.

PROGRESS REPORT ON OMB'S TASKS  
AND RESPONSIBILITIES UNDER THE  
PAPERWORK REDUCTION ACT OF 1980  
(AS OF OCTOBER 31, 1982,  
UNLESS OTHERWISE NOTED)

PAPERWORK REDUCTION

<u>Description of Task</u>	<u>Status</u>
1. Establish agency burden reduction goals. Identify initiatives which would reduce by 10 percent the burden associated with Federal grant programs by 4/1/82.	OMB met the statutory deadline. OMB established agency burden reduction goals through the information collection budget process. OMB reported that a 25-percent reduction in grant reporting and an overall reduction of 17 percent was achieved by October 1982. OMB also projects that it will exceed the act's 25-percent goal for overall burden reduction by October 1983.
2. Oversee agencies' information collection requests-- approval process.	OMB completed over 6,600 reviews of agencies' reporting and recordkeeping requirements between April 1, 1981, and September 30, 1982.
3. Complete actions on Commission on Federal Paperwork recommendations by 4/1/83.	OMB has met this statutory deadline. OMB has issued three reports covering actions taken on 501 recommendations addressed to agencies in the executive branch. The first report on multi-agency recommendations was issued in January 1981; the second report on departmental recommendations was issued in March 1982; the third and final report on independent agencies and OMB recommendations was issued in January 1983.

PAPERWORK REDUCTION (Cont'd)

<u>Description of Task</u>	<u>Status</u>
4. Delegate clearance authority for approving proposed information collection requests to the agencies.	No delegations have occurred and criteria for obtaining a delegation have not been developed.
5. Issue guidance and promulgate rules, regulations, or procedures necessary to exercise the paperwork control authority provided by the act.	OMB issued a final regulation effective May 1983 to implement the act's paperwork control provisions. Prior to this, OMB had issued limited formal guidance.
6. Propose changes in legislation to improve information resources management practices and to eliminate impediments to burden reduction.	Some legislative changes have been developed and proposed to eliminate impediments to burden reduction.
7. Develop a Federal Information Locator System and have it operational by 4/1/82.	OMB did not meet the statutory deadline. OMB has selected a FILS prototype system and is currently loading information for testing to begin about April 1983. A FILS steering committee, comprised of representatives of major Departments and agencies, has also been formed. A fully operational FILS is not expected until October 1983--18 months after the statutory deadline.
8. Develop a proposal to augment FILS to include major agency holdings by 4/1/82.	OMB did not meet the statutory deadline. OMB is waiting for the establishment of a fully operational FILS.
9. Identify areas of duplication in information collection and develop a schedule and methods for its elimination by 4/1/82.	OMB did not meet the statutory deadline. Efforts to identify duplication are made in connection with routine information collection reviews. Systematic reviews for duplication will not be made until FILS is operational in October 1983.

PAPERWORK REDUCTION (Cont'd)

<u>Description of Task</u>	<u>Status</u>
10. Designate central collection agencies where appropriate.	OMB has not identified opportunities for designating central collection agencies.
11. Direct agency sharing of information where appropriate.	OMB has not identified opportunities for directing agency sharing of information.
12. Obtain assistance from GSA in developing standards for records retention by the public.	OMB's final regulation which replaces Circular A-40 contains a 3-year guideline for records retention. GSA assistance was not obtained in developing the guideline. OMB plans to address deviations from the 3-year guideline on an individual basis and believes this process will eventually result in meaningful record retention standards.

ADP/TELECOMMUNICATIONS

13. Develop and implement ADP/telecommunications policy.	No new policy developed. At OMB's request GSA informally provided OMB in February 1982 a draft revision of Circular A-71 dealing with management of ADP activities. However, the draft was unsatisfactory due to poor guidance by OMB and will be redone by OMB without GSA assistance. OMB does not consider this a high priority.
14. Oversee ADP/telecommunications acquisitions.	Agency reviews of some acquisitions being conducted. Existing oversight practices, consisting primarily of reviewing agencies' ADP/telecommunications budget proposals on a selected case-by-case basis, continued.



ADP/TELECOMMUNICATIONS (Cont'd)

<u>Description of Task</u>	<u>Status</u>
15. Develop ADP/telecommunications 5-year plan by 4/1/83.	OMB issued a plan in 1982 which was the same type in existence prior to the act--essentially a listing of agencies' planned procurements. However, OMB is working with GSA and the Department of Commerce in developing a more comprehensive plan which OMB believes will be responsive to the act. Since development of the new plan did not start until November 1982, time constraints will cause the initial 5-year plan to be limited in scope. However, OMB officials said they expect to complete the plan in April 1983.
16. Develop a program to enforce Federal information processing standards by 4/1/83.	No new program developed. OMB believes actions taken before passage of the act have fostered enforcement. NBS meets annually with agencies to discuss an annual plan of standards development. Enforcement of the standards, according to OMB, is through the application of the procurement regulations.
17. Revitalize standards development program by 4/1/83.	OMB believes the actions it took prior to 1979 revitalized the program. OMB took action to significantly increase the budget, see that more and better people were hired, and directed improved management procedures. However, the FY 1984 budget for this program has been reduced from \$10 to \$3 million to reflect a shift to greater reliance on the development of voluntary standards by the private sector.

ADP/TELECOMMUNICATIONS (Cont'd)

<u>Description of Task</u>	<u>Status</u>
18. Promote use of information processing technology.	OMB believes some projects having potential for improving information technology applications are included in its March 1982 review plan. Reviews are still in process.
19. Settle disputes between GSA and agencies under the Brooks Act (P.L. 89-306).	No disputes have been formally referred to OMB since the Paperwork Act became effective.

STATISTICS

20. Develop long-range plans for improved performance of Federal statistical activities and programs.	OMB has abolished the Statistical Policy Branch, has not filled the Government's Chief Statistician position, and has sharply cut the resources devoted to developing Government-wide statistical policies. A special report on statistics related to the FY 1984 budget of principal Federal statistical programs was first cancelled and then reactivated. OMB is now trying to get a better fix on current conditions and short-range plans in the statistical area with long-range planning to follow. Work is continuing on developing a legislative proposal on confidentiality of statistical information.
21. Develop and coordinate Government-wide statistical policies.	Existing Department of Commerce statistical policy directives, which are still in force, are under review for possible modifications before being issued as OMB policy directives. This status has not changed for over a year. A few new standards have been issued or are under review.

RECORDS MANAGEMENT

<u>Description of Task</u>	<u>Status</u>
22. Coordinate records management with other related information programs.	OMB is developing a proposal to require agencies to reimburse GSA for storage. OMB also believes that a recent reorganization within GSA will expand its records management role and contribute to accomplishing this task.

INFORMATION SHARING AND DISCLOSURE

23. Develop and implement policy guidance on disclosure of information, confidentiality, and security of information.	No new policy or guidance issued. Policy guidance in the statistical area under consideration but not issued.
24. Propose legislation to remove inconsistencies for privacy, confidentiality, and disclosure of information by 4/1/83.	Recommendations for administrative and legislative change are being evaluated and will be discussed in OMB's April 1983 annual report. Proposed legislation in the statistical area is under consideration.

INFORMATION POLICY AND OVERSIGHT

25. Issue guidance to agencies on establishing their senior officials.	Minimal guidance issued to agencies in OMB Bulletin 81-21.
26. Issue guidance to agencies for conducting their information management reviews.	Minimal formal guidance issued to agencies in OMB Bulletin 81-21. Informal guidance provided to individual agencies on their plans.

INFORMATION POLICY AND OVERSIGHT (Cont'd)

<u>Description of Task</u>	<u>Status</u>
27. Review agency information management activities at least once every 3 years and report to the Congress.	In March 1982 OMB issued a report identifying 66 activities of 26 agencies for review. Of the 66 reviews, 13 have been completed. The remaining 53 are still being acted on at the agencies. Some have already missed one or more target dates.
28. Obtain advice and assistance from GSA in reviewing agencies' information management activities.	GSA assistance was not obtained in planning or selecting reviews to be conducted. However, GSA assisted OMB in conducting a review of one activity at one department. Also, a GSA employee has been detailed to OMB to assist in monitoring selected agencies' information resources management reviews.
29. Coordinate and make uniform Federal information policies and practices by 4/1/83.	OMB does not consider this a high priority and has deferred this task.
30. Oversee information research practices.	OMB does not consider this a high priority.
31. Identify productivity initiatives using information processing technology by 4/1/83.	OMB plans to identify productivity initiatives through its review of agency information management review plans and its triennial reviews. In March 1982 OMB announced several agency programs it will evaluate. No initiatives have been announced.

INFORMATION POLICY AND OVERSIGHT (Cont'd)

<u>Description of Task</u>	<u>Status</u>
32. Report to the Congress on major Paperwork Act activities annually.	First report issued April 1982. However, the report did not mention that many reporting and recordkeeping requirements contained in existing regulations at the Department of Treasury and other agencies have not been approved. This was due, in part, to a dispute over the scope of the act.
33. Establish audit standards and requirements for information systems by 4/1/82.	OMB did not meet the statutory deadline. This project began in March 1982; however no document has been prepared.
34. Assign responsibility for Government-wide and multi-agency audits by 4/1/82.	OMB did not meet the statutory deadline. A few assignments have been made and others are anticipated.

ORGANIZATIONAL DEVELOPMENT AND ADMINISTRATION

35. Define OIRA structure.	Establishment of OIRA and appointment of an administrator occurred in January 1981.
36. Delegate act functions to OIRA.	Letter of delegation issued on April 1, 1981.
37. Arrange for transfer of personnel.	Some personnel transferred to OIRA by April 1, 1981. However, statistical personnel transfers not completed until August 23, 1981--4 months after effective date of act.
38. Appropriations for OIRA funding.	OMB displayed a budget item for information and regulatory affairs in the 1983 and 1984 budgets. However, OMB did not separately identify resources needed for implementing the Paperwork Act.

ORGANIZATIONAL DEVELOPMENT AND ADMINISTRATION (Cont'd)

<u>Description of Task</u>	<u>Status</u>
39. Provide GAO access to all records.	After an access to records problem in 1981, agreement was reached for access on this assignment. GAO was provided access to records except those which contain advice, recommendations, and/or opinions to superiors.

STATISTICS ON THE NUMBER OF OIRA  
EXECUTIVE ORDER 12291 TRANSACTIONS  
FEBRUARY 17, 1981 THROUGH SEPTEMBER 30, 1982

Total Regulation Requests Received		4,908
Reviews Completed	4,812	
Completed Actions		
Consistent with Executive Order (No change)	4,178	
Consistent with Executive Order (Minor change)	337	
Withdrawn by agency	68	
Returned to agency	141	
Exempt from Executive Order	88	

STATISTICS ON THE NUMBER OF OIRA PAPERWORK  
TRANSACTIONS UNDER PUBLIC LAW 96-511  
APRIL 1, 1981 THROUGH SEPTEMBER 30, 1982

Total Paperwork Requests Received 6,802

    Reviews Completed 6,674

Completed Actions

Regular Action Under Section 3507(a)--Information Collection Requests

Approved by action	5,798
Approved by default	12
Disapproved	451
Other types of actions	341
Total actions	<u>6,602</u>

Emergency Actions Under Section 3507(g) (Fast track)--Information Collection Requests

Approved	18
Disapproved	0
Total actions	<u>18</u>

Actions Under Section 3504(h)--Rules Containing Information Collection Requests

Proposed Rules:

Approved by action	35
Approved by default	1
Disapproved	11
Other type of actions	7
Total actions	<u>54</u>

Final Rules: No actions or requests for action





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