

PRA REVIEW CHECKLIST

| # | Review Item | Y/N/NA |
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| 1. | Does the request include: <ul style="list-style-type: none"> - an OMB-83I, - a Supporting Statement, - copies of any collection forms, - the portion of a law authorizing the activity, - any associated existing regulations, and - either the Federal Register Notice that solicited comment on the submission or a proposed rule? | |
| 2. | Is everything in electronic format (an electronic format that can be integrated into a PDF file)? | |
| 3. | Have the most recent formats of the OMB-83I and Supporting Statement been used? | |
| 4. | Have all of the OMB-83I and Supporting Statement questions been fully and properly answered (e.g., does answer #2 of the Supporting Statement address the Information Quality Guidelines)? | |
| 5. | Does the Supporting Statement describe what information is to be collected, why, and how it is to be used? This should be pretty specific. | |
| 6. | Does the collection duplicate any other information being collected, and if so, is such duplication addressed and justified? | |
| 7. | Do all of the requirements belong in one submission? One submission cannot be used to revise more than one currently-approved collection. Some proposed rules will need multiple PRA requests to avoid this problem. In a few cases in the past requests were allowed to contain a mix of things, and the requirements were later transferred to the specific collections they really belonged in. Although easier for the program office in the short run, that approach turned out to be difficult and confusing in the long run and should not be repeated. A request should not seek approval to use an existing cleared form for a new purpose unless the request is a revision to that existing clearance. Otherwise you can end up with multiple OMB approval numbers and expiration dates for the same form, causing many future headaches. This whole area can be tricky and needs to be treated with care. | |
| 8. | Do the documents actually address just the information collection in question (and not include text copied from some prior submission that talks about extraneous matters)? | |
| 9. | If forms and/or a proposed rule are involved, does the Supporting Statement description match the contents of the forms/rule? | |

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| 10. | Does the math compute - are the hour burden and dollar costs correctly arrived at? Are the same numbers used in the Supporting Statement and on the OMB-83I? (If the submission is a revision, the Supporting Statement just needs to address the change in hours and cost while the OMB-83I must be comprehensive, but the numbers in the Supporting Statement should be consistent with the program changes or adjustments in hours and costs shown on the OMB-83I. See 28 below.) | |
| 11. | If confidentiality is promised, is there a law to back this up? NAO 216-100 by itself is not sufficient. | |
| 12. | Does answer #3 of the Supporting Statement agree with GPEA submissions? | |
| 13. | If comments were received on the Federal Register Notice, does #8 address the comments? | |
| 14. | Are the estimated response times in #12 of the Supporting Statement realistic? Do they include the time to collect and review the information, and not just the time to fill out a form or report the information? Do the same estimates appear on any related forms? | |
| 15. | Do the costs in #13 of the Supporting Statement properly exclude valuations of the response time (no salary costs for the burden hours)? Do they include mail and copying costs, fees, legal costs, etc.? | |
| 16. | Does #15 of the Supporting Statement correctly identify program changes versus adjustments (if any)? Do these agree with blocks 13 and 14 on the OMB-83I? (NOTE: all new collections or reinstatements are automatically program changes.) | |
| 17. | If there is sampling involved, has Section B of the Supporting Statement been completed? Does it make sense? Does it meet OMB standards (particularly a 60% response rate from the sample chosen)? | |
| 18. | If Social Security Numbers are required, have they cited the law that authorizes them to do so? (If a permit, license, loan, or grant is involved the Debt Collection Act may require that the SSN be obtained.) If the SSN is a voluntary field, have they justified the need for it? | |
| 19. | If the submission is a request for renewal of PRA clearance, does it either address all of the previously-approved requirements or surveys, or explain why they have been eliminated? | |
| 20. | Does the overall justification make sense? | |

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| 21. | If collection forms are involved, do they display all of the required PRA information (Web surveys may link to the information except for the OMB # and expiration date, which must be on the initial survey screen). If not, does the Supporting Statement justify not displaying some or all of the information? | |
| 22. | If there is a collection form, are all of the questions germane to the stated purpose and appropriate to the respondent type (e.g. don't ask shoreside processors about their vessel characteristics)? | |
| 23. | Is any guidance provided with the form clear and does it match the actual form? If no guidance is included, should it be? | |
| 24. | Do the entry areas on the form provide enough room to actually enter the information requested? | |
| 25. | Do the questions on the forms match the requirements of the associated regulation (if any)? If the regulation details information requirements, the form must be consistent with those details. | |
| 26. | If the survey asks about ancestry or ethnic origin, do those questions comply with OMB guidelines (See www.whitehouse.gov/omb/fedreg/ombdir15.html) | |
| 27. | If a proposed rule is involved, does the classification section properly address the information requirements? | |
| 28. | If this is a revision to an existing collection: - Is the title of the OMB-83I the correct title for the overall collection (as opposed to the name of the revision action)? - Are the numbers in 13 and 14 comprehensive? - If block 6 asks for 3 years approval, does the attached Supporting Statement address all of the collection's requirements (not just the revision)? If the Supporting Statement doesn't, the existing expiration date must be used (e.g. 06/04) | |