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RE: Office of Management and Budget Information Collection Request on Improving Customer Experience

To Whom it May Concern,

The Data Foundation is a non-profit organization that seeks to improve government and society by using data to inform public policymaking. Our Data Coalition Initiative is America's premier voice on data policy, advocating for responsible policies to make government data high-quality, accessible, and usable. An important part of that effort is supporting the development and implementation of the Foundations for Evidence-Based Policymaking Act (Evidence Act), which aims to improve the efficiency and effectiveness of government services.

In line with the principles of the Evidence Act and the Paperwork Reduction Act (PRA), it is encouraging that the Office of Management and Budget (OMB) intends to increase the amount of data collected government-wide that will be "evaluated and used to improve the delivery of Federal services and programs" as well as "displayed on Performance.gov to help build transparency and accountability of Federal programs to the customers they serve."

We offer three suggestions to improve the overall process of Information Collection Requests (ICRs) and compliance with the PRA in order to ensure the federal government is efficiently gathering necessary data to strengthen customer service for the American people. The first two recommendations fall under the jurisdiction of OMB and can be addressed administratively, while the third recommends ways for OMB to engage Congress on addressing statutory changes.

1. **OMB should accelerate implementation of a government-wide automated tool for ICRs that support agency data inventories.** To support ongoing reviews of ICRs, the public should be provided with access to increased and improved information about existing government data collections, in conjunction with implementation of the OPEN Government Data Act (Evidence Act Title II) data inventory and metadata requirements. Such a resource would support government-wide coordination to rapidly improve metadata and transparency about government data collection, identify data needs, and minimize collection burden on the American public by potentially reducing duplication in government data collections.
2. **OMB should issue clarifying guidance to agencies on pain points in implementing the PRA and how it relates to improved customer service.** Included in the guidance, OMB can advise agencies how to coordinate appropriate resources for implementing internal agency PRA approvals, clarify what data should be designated as "essential information," as well as provide additional guidance to agencies on calibrating respondent burdens for small businesses and

individuals alike. OMB can also take further steps to encourage use of “generic clearances” and delegation authorities that exist in PRA. To align with the Administration’s customer experience priority, OMB should emphasize the potential impact of modernizing the PRA on customer service.

- 3. OMB should conduct a comprehensive review process to inform Congress on ways to establish a more streamlined process for ICR review and adjust the scope of the PRA applicability.** In a survey conducted by the 2017 Commission for Evidence-based Policymaking, agencies identified the PRA scope as a major process barrier for engaging in evidence-building activities. While burden and use is already incorporated into the ICR process, there is still room for additional effort to modernize ICR review and improve agencies' ability to meet the needs of their customers. Such a review could, for example, result in a new framework for implementing the PRA that adjusts the reporting threshold of 10 respondents to a higher number, like 200 respondents, continuing transparency, and public comment, with increased delegation to agencies.

The Data Coalition’s group of experts considered an alternative to adjust the threshold triggering PRA’s requirement for OIRA review to 50 or more respondents, with an exception for policy-relevant or significant data collection activities. This modification would reduce the burden on OMB and agency staff in reviewing smaller-scale ICRs, support agencies in improving efficiency of data collection, and be benchmarked to the number of states in the country which would be used for cooperative agreement and grant data collections, for example. This would reduce the current load of ICR reviews submitted for OIRA approval by approximately 13 percent (from 9,313 to 8,123).¹ However, selecting one arbitrary threshold over another is not evidence-based policymaking; thus, a comprehensive review process is strongly recommended.

Thank you for the opportunity to provide comment on this very important issue, and we hope to continue to support your efforts in the successful use of data to ensure the Federal government is providing high-quality services to its taxpayers. Please contact me at corinna@datafoundation.org if you have any questions or would like to discuss the Data Coalition’s interest in this matter further.

Sincerely,

Corinna Turbes
Managing Director
Data Coalition

¹ Authors analysis using bulk download data from RegInfo.gov.