

Overview of Paperwork Reduction Act: Process and Requirements

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Objectives of the workshop

- To provide an overview of the general Paperwork Reduction Act process, including:
 - When approval is required,
 - The expected timeline for approval,
 - Required documents, and
 - Internal review requirements.
- To review in detail the requirements of the “Supporting Statement for Part B Statistical Methods”.

What is a PRA?

Paperwork Reduction Act submission (PRA)

Also known as Information Collection Request (ICR) and OMB Clearance Package describes the information collection requirements imposed on the public by a Federal agency.

Purpose of PRA

- Balance between necessary collection and imposing unjustified costs on the public,
- Maximize the utility of information collected, and
- Improve the quality and use of Federal information.

OMB, OIRA (Office of Information and Regulatory Affairs)

- Evaluates whether the collection meets these purposes, and approves data collections.

When is a PRA required?

Approval for an information collection from the public is required when:

- *Identical* questions or reporting requirements are posed to ten or more persons or organizations (within any 12 month period).
- This includes voluntary collections, mandatory collections, and collections required to obtain a Federal benefit (e.g., a job, a grant, a contract).
- Including numerical, graphic, or narrative information collected through oral, paper, electronic, or other modes.

When is a PRA not required?

When the collection is “not information”, such as:

- Tests of the aptitude, abilities, or knowledge of persons; and
- Facts or opinions that are addressed to a single person, or obtained via public hearings or meetings or direct observation by the agency.

Certain types of information collections:

- Federal criminal investigation or prosecution,
- Civil action to which the United States is a party,
- Intelligence activities,
- **Collections from Federal agencies or employees in their official capacities (unless for general statistical purposes), and**
- **Collections from 9 or fewer individuals (such as an instrument pre-test).**

How does this work?

Two major types of PRA submissions

- **Usual review** – 6-9 months, including 60-day Federal Register notice.
 - Expedited procedure if: (1) public harm is likely, (2) unanticipated event has happened, (3) court ordered deadline is to be missed.
- **Generic clearance** – regular approval process for the general type of data collection and fast track approval of specific collections included under the generic clearance.



Usual review - The Long and Difficult Route

- 0. Assess if PRA is required
- 1. Develop PRA (including internal review)
- 2. 60-day Federal Register Notice
- 3. Consider public comments.
- 4. 30-day Federal Register Notice
- 5. Submit the proposed collection to OMB for review and approval
- 6. OMB review

What are the required documents?

(Emergency ICP Request Memo for expedited review)

1. Completed OMB 83-I form
2. Supporting Statements A and B and Burden Grid
3. Data collection instruments (questionnaires, surveys, etc.).
4. Copy of the 60-day Federal Register Notice
5. Copies of any pertinent statutes or regulations which reference the collection's requirements or provide guidance for the information collection.
6. Copy of the 30-day Federal Register Notice

Additionally an electronic copy of the supporting statements A and B should be included or e-mailed.

Generic Clearance: The Quick and Easy Way

A streamlined process to obtain OMB's approval for particular information collections - usually voluntary, low-burden, and uncontroversial, **where public dissemination is not intended**.

When to use?

For conducting more than one information collection using very similar methods when

1. The need for, and the overall practical utility of, the data collection can be evaluated in advance as part of the review of the proposed plan, but
2. The agency cannot determine the details of the specific individual collections until a later time.

Two parts of fast track clearance:

1. Generic Clearance for the general type of data collection, and
2. PRA package for a specific data collection that falls under the generic clearance.

Generic Clearance: The Quick and Easy Way

- Generic clearance approval may remain valid for up to three years.

Generic clearance PRA package and process

- Includes all the same documents and public notice requirements as the usual PRA process.
- The supporting statements describe the general approach and methodology to be used for the group of data collections proposed.

Specific data collection PRA packages and process

- Develop PRA using short form
- Internal approval and send to OMB
- OMB has 5 days to review the PRA
- OMB issues approval, disapproval, withdrawal
- Doesn't require either the 60-day or 30-day public notices.
- Submit one collection at a time or multiple eligible collections together.

Where do I find...

- The PRA submission form (OMB 83-I) and instructions:
 - <http://www.whitehouse.gov/sites/default/files/omb/inforeg/83i-fill.pdf>
- The instructions for Supporting Statement Parts A and B:
 - On pages 6-7 in linked document above
- Generic Clearance PRA Short Form:
 - <http://www.usability.gov/how-to-and-tools/guidance/fast-track-clearance-process.html>
- DOL CEO's internal review checklist for Supporting Statement Part B:
 - Q:\DOL CEO Office\PRA Reviews\Chief Evaluation Office OMB PRA Review Checklist_rev 1.13.14

Where do I find...

Examples of approved PRA submissions:

- Click on “View Supporting Statement and Other Documents” link to see Supporting Statements A and B.

Generic Clearance

- ETA Quick Turnaround Surveys of WIA Implementation (approved 1/9/14)
 - http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201308-1205-009

Regular approval, data collection with statistical methods

- WHD Worker Classification Survey (approved 5/14/14)
 - http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201303-1235-002

Regular approval, data collection without statistical methods

- ETA Site Visits for Green Jobs Training Evaluation (approved 10/2/12)
 - http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201207-1205-004

Supporting Statement Part A

- Required of all PRA packages
- Supporting Statement Part A includes information about:
 - Why the data collection is necessary and the purpose of the data collection,
 - Why the data collection doesn't duplicate information already available,
 - The consequence to Federal programs if data collection isn't conducted,
 - The justification for questions of a sensitive nature,
 - The estimated total hour burden to respondents,
 - The estimated total annual cost to respondents, and
 - Plans for tabulation and publication of data

Supporting Statement Part B When?

- When is Supporting Statement Part B required?
 - If the data collection uses sampling, imputation, or other statistical methods, part B will be required. Nearly all data collections for research and program evaluations require a part B statement.
- Two important considerations:
 1. Does the data collection use statistical sampling and/or imputation methods to produce data that is intended to represent the entire population?
 2. Will the analysis results be generalized to the entire population (statistical inference)?

Supporting Statement Part B

All or parts?

Generally all sections of Part B are required for:

Surveys

- Uses stratification, clustering, and/or other statistical methods to select potential respondents from the full population. Uses weights. Analysis results are generalized to the full population.

Some sections of Part B are required for:

Censuses

- The full population is included as potential respondents. May use weights. Analysis results are generalized to the full population.

Site Visits

Focus Groups

Interviews

- Often uses non-statistical sampling to select potential respondents (such as convenience or purposive sampling). Analysis results aren't generalized beyond the immediate respondents.

Supporting Statement Part B

Five Sections

1. Respondent universe, sample, and expected response rates
 - All data collections should include this information.
2. Statistical methods for sample selection and variance estimation and analysis plan
 - All data collections should include an analysis plan.
 - Discussion of statistical methods for sample selection and variance estimation will depend on the type of data collection.
3. Methods to maximize response rates and deal with non-response and accuracy / reliability of the data
 - All data collections should include methods for maximizing response rates and address the accuracy / reliability of the data.
 - Discussion of methods for dealing with non-response will depend on the type of data collection.
4. Test of procedures
 - All data collections should include plans to test the data collection instrument and process.
5. Contact information for persons involved in statistical methods, data collection, and analysis
 - All data collections should include this contact information.

Supporting Statement Part B

Section 1 Detail

- From section 1, OMB should clearly understand:
 - A high level view of the sample selection method,
 - The number of potential respondents in the data collection's universe (total and by strata),
 - The number of respondents in the sample (total and by strata),
 - The sampling unit, and
 - The expected response rate for the data collection.
- The sample is the number of individuals contacted, not the number of individuals expected to respond.
- Section 1 should state if the data collection is a census and if the collection will use non-statistical sampling methods.

Supporting Statement Part B

Section 2 Detail

- Section 2 should provide a more detailed discussion of the sample selection methodology.
 - Even if the data collection uses a non-statistical sampling method, section 2 should provide detailed information about the sample selection method.
- Even for data collections using non-statistical sampling, the analysis plan should be discussed in detail.
- Section 2 should state if the data collection's results will not be generalized to the full population and specify how this relates to the requirements of section 2.
 - If the data collection isn't intended to represent or be generalized to the full population, the following issues don't apply:
 - Significant effect sizes,
 - Variance estimation, and
 - Statistical tests in the analysis plan.

Supporting Statement Part B

Section 3 Detail

- Whether or not the data collection results will be generalized to the full population, section 3 should address response rates.
- The discussion in section 3 should include:
 - Plans for maximizing response rates (including incentives),
 - Non-response bias analysis,
 - Plans for non-response weights, and
 - Other procedures (such as imputation) to address non-response.
- The latter two issues would not be applicable for data collections whose results will not be generalized to the full population.
- Section 3 should also discuss whether the data collection will accurately and reliably measure the issues of interest.

Supporting Statement Part B

Section 4 Detail

- Section 4 should discuss:
 - What kinds of tests of the data collection instrument and process will be conducted,
 - For what the results of the tests will be used, and
 - If the tests have already been conducted, what were the results and how were they used.
- If the tests of procedures will involve 10 or more people, the tests will require their own PRA approval.